

Managing Project Changes



Northern Illinois
University

Purpose

To ensure that budget and project changes on sponsored awards are managed in accordance with award terms and conditions.

Reason for Policy

After a Principal Investigator (PI) receives a sponsored award, changes resulting from circumstances not anticipated in the planning stages of the project are sometimes necessary. Some changes require notification to or prior written approval from the sponsor while Sponsored Programs Administration (SPA) can approve and process other changes on the sponsor's behalf. It is important that NIU, as the grantee, manage project changes (including budget modifications) in accordance with award requirements so as not to jeopardize future sponsored funding. Further, working with SPA to manage project changes as soon as they are anticipated can minimize project delays and help the project run smoothly.

Intended Audience

- Directors, department chairs, division heads.
- Faculty and staff.
- Departmental/divisional business administrators.
- Finance personnel.
- Sponsored programs administration personnel.
- Research compliance personnel.

Policy

All project changes, including budget modifications, must be reviewed by SPA before the change can occur. During review of the change, SPA will determine if the change requires prior sponsor approval or if SPA can approve the change. When prior sponsor approval or notification is required, SPA will interact with the sponsor on behalf of the Principal Investigator to seek approval or notify the sponsor of the change. When prior approval is required, SPA will make the change only after receiving agency permission.



Policy Notes Specific to Federal Awards

The two lists below outline: 1) Changes that often require prior agency approval; and 2) Changes that SPA can usually approve on behalf of the agency. These lists are not all-inclusive but are provided as guidance to illustrate common project changes.

Note that for budget revisions requiring prior agency approval, the agency has up to 30 calendar days to review the request and notify NIU of their decision. Other requests may take longer than 30 calendar days.

Awards carry considerable nuance regarding agency approval of project changes.

Always contact your Grants and Contracts Associate to discuss project changes.

Changes Requiring Prior Agency Approval

Programmatic

1. Changing the objectives or scope of the project (even if there is no associated budget revision).
2. Changing the approved use of animals or human subjects.
3. Extending the period of performance beyond the first 12 month no cost extension.
4. Transferring the project to a new grantee institution.
5. Transferring a significant part of the programmatic effort to a non-NIU party via a subaward that was not included in the approved proposal. This does not include contracts (i.e., vendor services).



Financial

1. Incurring pre-award costs more than 90 calendar days before the award start date.
2. Charging salaries of administrative and clerical staff as direct costs (unless included in the approved proposal).
3. Transferring participant support/trainee costs to another budget category or adding these costs to a project.
4. Changes to agency approved cost share (both mandatory and voluntary committed).
5. Issuing a fixed price subaward.

Personnel

1. Changing key person(s) specified in the proposal or agency award.
2. The approved PI(s) leaving/disengaging from the project for three or more months.
3. The approved PI(s) reducing their time devoted to the project by 25 percent or more.

NSF only requires prior approval for a significant reduction of effort if the reduction will result in the impairment of the successful execution of the project. When this occurs, a replacement PI must be named.

SPA can often approve the following changes on federal awards:

1. Incurring pre-award costs 90 calendar days prior to award.

See "Charging Costs to a Sponsored Project Prior to Award Acceptance" (under university policies on the SPA Resources webpage).

2. Implementing a one-time, no-cost extension of the period of performance for up to 12 months. (SPA is required to notify the sponsor of the change.)
3. Carrying forward an unobligated balance from one budget period to the next (for research projects).
4. Rebudgeting between direct cost categories other than participant support costs (for research projects).



Roles and Responsibilities

Sponsored Programs Administration

Grants and Contracts Associate (GCA): The GCA is responsible for evaluating all budget or project changes. The GCA will coordinate with other SPA staff as needed to review and advise on project change requests, and will submit prior approval requests and notifications to the sponsor when required. The GCA retains documentation of all institutional and agency notifications and approvals and implements the change.

Academic Department:

Principal Investigator (PI): The PI is responsible for following this prior approval policy, notifying their GCA of any budget or project changes before they occur, or as soon as possible when the change becomes known, and communicating with unit heads regarding changes.

The PI will prepare any necessary documentation supporting the change in a timely manner as requested by SPA. Investigators are encouraged to have preliminary conversations with SPA and sponsor contacts regarding any change in technical objectives or scope prior to submitting a formal change request. Bear in mind, however, that Program Officers or agency technical staff are generally not authorized to approve the change for the agency.

Department Chair/Unit Head: The department chair or unit head is responsible for reviewing program changes requiring agency notification or prior approval. This review is necessary to ensure that any changes in resources or time commitments committed to the sponsor are available.

Note: Project changes require formal approval by an individual one level above the PI (e.g., when the PI is the department chair/unit head, the associate dean or equivalent position will review program changes. When the PI is a dean, the provost will review and approve, etc.).

Effective Date: 05/24/13

Revision Date: 01/16/18

Revision No. 2

Approval: Assistant vice president for Research and Sponsored Programs