

PRIOR APPROVALS & BUDGET REVISIONS

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2023 SYMPOSIUM
FOR RESEARCH ADMINISTRATORS

OBJECTIVES

- Identify when a Prior Approval Request (PAR) form is necessary and learn how to complete one properly.
- Review Research Terms & Conditions Prior Approval Matrix for federal awards with expanded authority.
- Complete an accurate budget revision, including appropriate indirect costs.

01

Prior Approvals

WHAT IS A PRIOR APPROVAL REQUEST?

- An unanticipated change to a sponsored project
- Occurs after the project has been proposed and awarded
- See OSP Policy 500.03 - Prior Approval Requests for additional information



PRIOR APPROVAL REQUESTS

- Prior Approval requirements depend on the sponsor and the individual project's terms and conditions.
 - These terms and conditions can usually be found in the award or in the sponsor's guidelines.
- Prior Approval Requests have **two** approval methods:
 - **Internally** by OSP or **externally** by the sponsor
 - The Sponsored Programs Specialist/OSP is authorized to make the final determination if internal or external approval is needed.
 - PIs and department grant administrators are not authorized to send prior approval requests directly to the sponsor.

PRIOR APPROVAL REQUESTS

- What kind of actions may require a prior approval request?
 - Additional funding request
 - Alteration and renovation costs
 - Budget revision
 - Change in scope
 - Equipment purchase
 - Foreign travel
 - Changes to key personnel and their effort
 - Adding a foreign component or foreign subrecipient
 - No cost extension request
 - Changes to patient care costs
 - Pre-award spending
 - Requesting carryover of unobligated funds from a previous budget period

WHEN SHOULD A PAR FORM BE SUBMITTED?

- A PAR form should be submitted to OSP (sponsoredprograms@unc.edu) by the department for **all** prior approval requests (requests for both internal and external approval).
- Sometimes, a sponsor portal is available for prior approval requests (for example, the Prior Approval Module in eRA commons for NIH projects)
 - Once the PAR form and needed documentation are submitted, the SPS can use the sponsor portal to submit the prior approval request.
- Check the guidelines for the sponsor and/or award for details on how to request prior approval. If a sponsor portal is not available, an email from an SPS/AOR with any needed documentation is typically permissible.

PRIOR APPROVAL REQUEST FORM

- **True or False:** A PAR form is not required by OSP when the prior approval request doesn't require sponsor (external) approval.

PRIOR APPROVAL REQUEST FORM

- **True or False:** A PAR form is not required by OSP when the prior approval request doesn't require sponsor (external) approval.



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Prior approval request FORM

UNC-CH PRIOR APPROVAL REQUEST FORM

- Review the contract/grant, application instructions, and sponsor guidelines to confirm sponsor requirements for Prior Approval
- Submit form with all required documents to OSP for review, internal approval, and submission to the Sponsor (for external approvals)
- OSP provides the final determination on which approval method (internal UNC-CH approval or external Sponsor approval) is required
- All communications with the sponsor **MUST** be conducted through OSP
- All form fields **MUST** be completed and incomplete forms are subject to being returned
- Submit the completed form by using the 'Submit' button below or emailing the form as an attachment to SponsoredPrograms@unc.edu

1. General Information

Project ID	RAMSeS IPF Number	PI Name	Department Number
Submitter Name	Email	Phone Number	Date

2. Prior Approval Action:

Select a Prior Approval Action from the drop-down above to view the action's definition and required documents in the boxes below.

Prior Approval Action Definition

3. Does this require Sponsor Prior Approval per the Award or Sponsor Guidelines?

Yes No

Your OSP Sponsored Projects Specialist can confirm the approval method (internal or external). Please contact your SPS if there are questions about the approval method before submitting this form.

4. Required documents associated with the Prior Approval action(s):

Complete any documentation required based on the approval method (internal or external) and sponsor requirements and submit with this form. Question 2 (Prior Approval Action) must be selected to see the required documents in the boxes below.

Documents for Internal University Approval

Subrecipient Letter of Intent
Subrecipient Detailed Budget and Budget Justification
Subrecipient Scope of Work

Documents for External Sponsor Approval

Justification Letter Signed by PI
Subrecipient Letter of Intent
Subrecipient Detailed Budget and Budget Justification
Subrecipient Scope of Work
Any Other Project/Sponsor Specific Requirements

5. Does this Prior Approval require a Budget Revision?

Yes No

If a Budget Revision is required, complete the Budget Revision form generated on page 2 by selecting "Yes" above.

6. Explanation & Justification (This does not replace the Justification Letter for External Prior Approval Requests)

7. Required Signatures

Submit forms digitally signed using the Submit button OR scan copies with ink signatures and email to SponsoredPrograms@unc.edu.



Principal Investigator Signature (Required)



Business Manager Signature (Required)

Submit

PRIOR APPROVAL REQUEST FORM

- 1) Department completes all components of PAR form
- 2) Department attaches any needed documentation
 - For example, a justification letter signed by the PI
- 3) Department sends the PAR form and necessary documentation to OSP (sponsoredprograms@unc.edu)
- 4) OSP sets up a Ram Tracker and routes to the SPS for processing

PRIOR APPROVAL REQUEST FORM

- The department chooses if the action requires internal OSP approval or external sponsor approval in #3. However, OSP makes the final determination.
- The **red box** in #4 includes the needed documents based on the type of approval.

3. Does this require Sponsor Prior Approval per the Award or Sponsor Guidelines?

Yes No

Your OSP Sponsored Projects Specialist can confirm the approval method (internal or external). Please contact your SPS if there are questions about the approval method before submitting this form.

4. Required documents associated with the Prior Approval action(s):

Complete any documentation required based on the approval method (internal or external) and sponsor requirements and submit with this form. Question 2 (Prior Approval Action) must be selected to see the required documents in the boxes below.

Documents for Internal University Approval

CV or Biosketch
Revised Budget and Budget Justification (if applicable)

Documents for External Sponsor Approval

Justification Letter Signed by PI
CV or Biosketch
Current and Pending/Other Support (if applicable)
Revised Budget and Budget Justification (if applicable)
Any Other Project/Sponsor Specific Requirements

PRIOR APPROVAL REQUEST FORM

- #6 includes space for an explanation/justification for the prior approval request. This is for OSP's internal purposes and does not take the place of a justification letter.
- If a justification letter is a required document, it should be sent as a separate document along with the PAR form.
 - Justification letters should be submitted on department letterhead and include the PI's signature.
 - Some justification letters also require an AOR's signature.

6. Explanation & Justification *(This does not replace the Justification Letter for External Prior Approval Requests)*

PRIOR APPROVAL REQUEST FORM

3. Does this require Sponsor Prior Approval per the Award or Sponsor Guidelines?

Yes No

Your OSP Sponsored Projects Specialist can confirm the approval method (internal or external). Please contact your SPS if there are questions about the approval method before submitting this form.

FAQ: I don't know if this prior approval request needs sponsor (external) approval – what should I do as a department grants manager?

- Choose the prior approval action on the PAR form; some actions require external approval in all cases.
- Consult the award or sponsor guidelines.
- Reach out to your SPS.
- Use your best judgment to mark question #3; your SPS will reach out if this approval method needs to be updated.

PRIOR APPROVAL REQUEST FORM

- How do you know if an action requires a Prior Approval Request?
 - Award terms and conditions
 - Agency guidelines
 - Research Terms & Conditions Prior Approval Matrix
 - OSP PAR form
- Some prior approval actions are always ineligible for internal approval. If you see this text in box #4 on the PAR form, make sure to update the approval method accordingly.

4. Required documents associated with the Prior Approval action(s):

Complete any documentation required based on the approval method (internal or external) and sponsor requirements and submit with this form. Question 2 (Prior Approval Action) must be selected to see the required documents in the boxes below.

Documents for Internal University Approval

Action Ineligible for Internal UNC-CH Approval
- Select 'Yes' for Question 3
- See External Sponsor Approval for Requirements

Documents for External Sponsor Approval

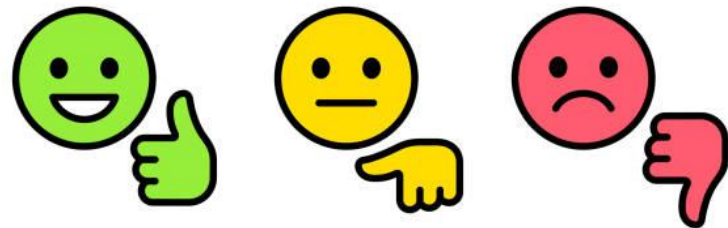
Justification Letter Signed by PI
Revised Scope of Work
Any Other Project/Sponsor Specific Requirements

02

Research Terms & Conditions Prior Approval Matrix

RESEARCH TERMS AND CONDITIONS PRIOR APPROVAL MATRIX

- How familiar are you with the Research Terms & Conditions Prior Approval Matrix?



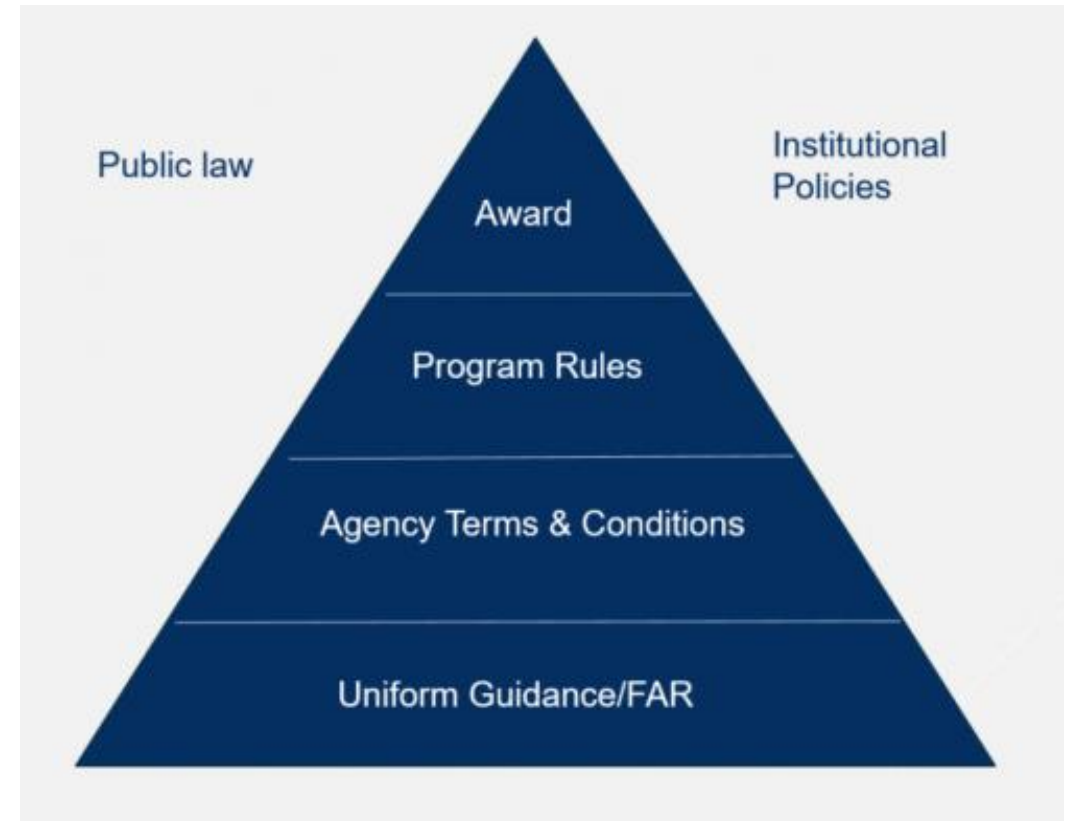
<https://www.istockphoto.com/essential/vector/smile-face-feedback-rating-icons-gm1326953883-411467499>

RESEARCH TERMS AND CONDITIONS PRIOR APPROVAL MATRIX

- Research Terms & Conditions were created by the FDP (Federal Demonstration Partnership) to reduce administrative burden.
 - The FDP is an association of federal agencies, institutions, and research policy organizations that work together to streamline administration of federally sponsored research.
- The Research Terms & Conditions Prior Approval Matrix is Appendix A and can be used when evaluating a prior approval request for a federal sponsor.
- Research Terms & Conditions apply **only** to federal grants.

RESEARCH TERMS AND CONDITIONS PRIOR APPROVAL MATRIX

- If the federal Research Terms and Conditions apply, certain changes can be made **without** prior sponsor approval.
- When there is a question about whether a federal rule applies to an award, the order of precedence pyramid should be followed:



RESEARCH TERMS AND CONDITIONS PRIOR APPROVAL MATRIX

- Many federal sponsors allow the institution to approve select types of unanticipated changes for grants and cooperative agreements.
- This is commonly known as **expanded authority**, issued through 2 CFR § 200.308 and Research Terms & Conditions.
- An example of an authority can be automatic carryover of unobligated balances (depending on the sponsor and the award).

RESEARCH TERMS AND CONDITIONS PRIOR APPROVAL MATRIX

■ How to use the RTC Prior Approval Matrix

- 1) Find your sponsor.
- 2) Find the prior approval action.
- 3) Determine if prior approval is required or waived (this means prior written approval is not needed).

FYI: If there is a number as a footnote/asterisk on the word waived or required, this means that this authority may be overridden by a special term or condition of the award.

RESEARCH TERMS AND CONDITIONS PRIOR APPROVAL MATRIX

For an NSF award, does a one-time No Cost Extension (NCE) require sponsor prior approval?

No, prior approval is not needed (waived).

Research Terms and Conditions Appendix A
Prior Approval Matrix
November 12, 2020

	Reference	RTC Overlay	NSF
Prior Written Approval (prior approval)*	200.407		
Use of grant agreements (including fixed amount awards), cooperative agreements, and contracts	200.407(a)		
Changes in principal investigator (PI), project leader, project partner, or scope of effort.	200.201(b)(5)	Required	Required
Cost sharing or matching	200.407(b)		
Use of unrecovered indirect costs, including indirect costs on cost sharing or matching.	200.306(c)	Waived	Waived
Use of current fair market value to determine the value of non-Federal entity contributions of services and donations of property for the purposes of cost sharing or matching.	200.306(d)(2)	Waived	Waived
Costs of the fair market value of equipment or other capital assets and fair rental charges for land when the Federal award supports activities that require use of equipment, buildings or land.	200.306(h)(2)	Required	Required
Program Income	200.407(c)		
Use of program income during the period of performance (additive method).	200.307(e)(2)	Waived	Waived
Revision of budget and program plans	200.407(d)		
Change in the scope or the objective of the project or program.	200.308(c)(1)	Required	Required
Change in a key person specified in the application or Federal award.	200.308(c)(2)	Required	Required ¹⁴
Disengagement from the project for more than three months, or a 25 percent reduction in time devoted to the project by the approved Project Director (PD) or PI.	200.308(c)(3)	Required	Required ¹⁴
Inclusion, unless waived, of costs that require prior approval in accordance with Subpart E -- Cost Principles.	200.308(c)(4)	Required	Waived ¹
Transfer of funds budgeted for participant support costs to other categories of expense.	200.308(c)(5)	Required	Required ²
Subawarding, transferring or contracting out of any work under a Federal award, including fixed amount subawards as described in 200.333. This provision does not apply to the acquisition of supplies, material, equipment or general support services.	200.308(c)(6)	Required	Required
Changes in the approved cost-sharing or matching provided by the non-Federal entity.	200.308(c)(7)	Required	Required
Need for additional Federal funds to complete the project.	200.308(c)(8)	Required	Required
Incur project costs 90 calendar days before the Federal awarding agency makes the Federal award.	200.308(e)(1)	Waived	Waived
Incur project costs more than 90 calendar days pre-award.	200.308(e)(1)	Required	Required
Initiate a one-time extension of the period of performance by up to 12 months.	200.308(e)(2)	Waived	Waived

RESEARCH TERMS AND CONDITIONS PRIOR APPROVAL MATRIX

For an NIH award, does carryover require prior approval?

No, prior approval is not needed (waived). However, a special term in the award can override this authority.

	Reference	RTC Overlay	NSF	DOE	NIH
Prior Written Approval (prior approval)*	200.407				
Use of grant agreements (including fixed amount awards), cooperative agreements, and contracts	200.407(a)				
Changes in principal investigator (PI), project leader, project partner, or scope of effort.	200.201(b)(5)	Required	Required	Required	Required
Cost sharing or matching	200.407(b)				
Use of unrecovered indirect costs, including indirect costs on cost sharing or matching.	200.308(c)	Waived	Waived	Waived	Waived
Use of current fair market value to determine the value of non-Federal entity contributions of services and donations of property for the purposes of cost sharing or matching.	200.308(d)(2)	Waived	Waived	Waived	Waived
Costs of the fair market value of equipment or other capital assets and fair rental charges for land when the Federal award supports activities that require use of equipment, buildings or land.	200.308(h)(2)	Required	Required	Required	Required
Program Income	200.407(c)				
Use of program income during the period of performance (additive method).	200.307(e)(2)	Waived	Waived	Waived	Waived ⁵
Revision of budget and program plans	200.407(d)				
Change in the scope or the objective of the project or program.	200.308(c)(1)	Required	Required	Required	Required
Change in a key person specified in the application or Federal award.	200.308(c)(2)	Required	Required ¹⁴	Required	Required
Disengagement from the project for more than three months, or a 25 percent reduction in time devoted to the project by the approved Project Director (PD) or PI.	200.308(c)(3)	Required	Required ¹⁴	Required	Required ⁶
Inclusion, unless waived, of costs that require prior approval in accordance with Subpart E -- Cost Principles.	200.308(c)(4)	Required	Waived ¹	Required	Waived ⁷
Transfer of funds budgeted for participant support costs to other categories of expense.	200.308(c)(5)	Required	Required ²	Required	Waived ⁸
Subawarding, transferring or contracting out of any work under a Federal award, including fixed amount subawards as described in 200.333. This provision does not apply to the acquisition of supplies, material, equipment or general support services.	200.308(c)(6)	Required	Required	Required	Waived ⁹
Changes in the approved cost-sharing or matching provided by the non-Federal entity.	200.308(c)(7)	Required	Required	Required	Required
Need for additional Federal funds to complete the project.	200.308(c)(8)	Required	Required	Required	Required
Incur project costs 90 calendar days before the Federal awarding agency makes the Federal award.	200.308(e)(1)	Waived	Waived	Waived	Waived
Incur project costs more than 90 calendar days pre-award.	200.308(e)(1)	Required	Required	Required	Required
Initiate a one-time extension of the period of performance by up to 12 months.	200.308(e)(2)	Waived	Waived	Waived	Waived
Subsequent no-cost extension or extension of more than 12 months.	200.308(e)(2)	Required	Required	Required	Required
Carry-forward of unobligated balances to subsequent budget periods.	200.308(e)(3)	Waived	Waived	Waived	Waived ¹⁰

RESEARCH TERMS AND CONDITIONS PRIOR APPROVAL MATRIX

- **True or False:** The Research Terms and Conditions Prior Approval Matrix is applicable to all awards.

RESEARCH TERMS AND CONDITIONS PRIOR APPROVAL MATRIX

- **True or False:** The Research Terms and Conditions Prior Approval Matrix is applicable to all awards.



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RESEARCH TERMS AND CONDITIONS PRIOR APPROVAL MATRIX

- **True or False:** The authority in the RTC Prior Approval Matrix can be overridden by a term or condition in the award.

RESEARCH TERMS AND CONDITIONS PRIOR APPROVAL MATRIX

- **True or False:** The authority in the RTC Prior Approval Matrix can be overridden by a term or condition in the award.



<https://www.freepik.com>

03

No Cost Extensions (NCEs)

NO COST EXTENSION

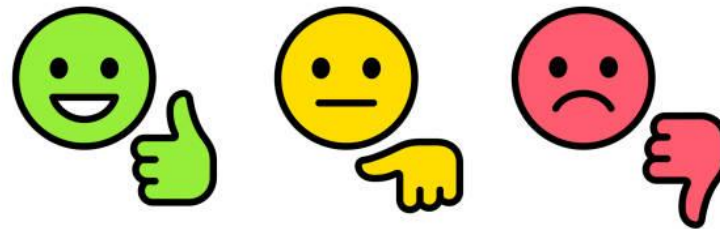
- A No Cost Extension is when additional time is required to complete the project's originally approved scope. Confirm the following conditions are met:
 - No additional funds are requested
 - There will not be a change in the project's originally approved scope
 - No term of the award specifically prohibits this extension

An allowable reason for an NCE: the science is not complete

An **unallowable** reason for an NCE: there is money left on the project

NO COST EXTENSION

- **FAQ:** If the PI is already talking to their technical or program lead, can the PI request the NCE instead of OSP?



<https://www.istockphoto.com/essential/vector/smiley-face-feedback-rating-icons-gm1326953883-411467499>

NO COST EXTENSION

- **FAQ:** If the PI is already talking to their technical or program lead, can the PI request the NCE instead of OSP?



<https://gifer.com/en/7FM4>

04

Budget Revisions

WHAT IS A BUDGET REVISION?

- A budget revision may be needed to meet unanticipated needs and to make other types of post-award changes. For more detailed information about budget revisions, please see OSP Policy 500.19 Budget Revisions.
- A programmatically sound budget revision justification is **required** for audit purposes.
- “Cleanup” budget revisions are not allowed at the end of the project.

IS A BUDGET REVISION ALLOWED ON A PROJECT?

To determine if a budget revision is allowed, be sure to consult...

- Award guidelines
- Sponsor guidelines (including the RTC Prior Approval Matrix if applicable)
- **FYI:** If a sponsor requires approval for a re-budget greater than 25% of the total award, this is cumulative for the life of the award.

IS A BUDGET REVISION ALLOWED ON A PROJECT?

- If sponsor approval is required, complete a PAR form.
- If sponsor approval is not required, complete a Budget Revision form.

FYI: OSP will make the final determination if sponsor approval is required.

BUDGET REVISION

- On the PAR form to complete a budget revision, click "Yes" for question #5.

5. Does this Prior Approval require a Budget Revision?

Yes No

If a Budget Revision is required, complete the Budget Revision form generated on page 2 by selecting "Yes" above.

- This will add another page to the PAR form, allowing you to input the requested budget revision.
- Some helpful tips will appear at the top left of the new page.
 - The total of the revision to the budget must net to zero
 - All Project IDs and Account Codes being revised must be active and have a positive balance to revise the budget
 - Account Codes excluded from Indirect Cost may require revisions to the Indirect Cost budget in Account Code 559000
 - All Budget Revisions require a justification explaining the reason for the change
 - All Budget Revisions require approval from the Principal Investigator or an approved designee
 - Submit the completed form by using the 'Submit' button below or emailing the form as an attachment to SponsoredPrograms@unc.edu.

BUDGET REVISION

A first step to determine if external sponsor approval is needed for a budget revision is to consult the project's **designated restriction code**.

FYI: 000 does not always mean that a budget revision is unallowable; this code can also indicate a very low threshold to revise the budget as awarded.

34. **Designated Restriction:** Identify the ability to revise the budget as awarded.

34.1 **000** – Indicates no rebudgeting or a very low threshold for budget variance

34.2 **001** – No budgetary restrictions are provided by the sponsor

34.3 **005** – Rebudgeting between salary, fringe, consultants, supplies, services, travel, maintenance

BUDGET REVISION

If the designated restriction is 000, this indicates more investigation is needed by the SPS to determine the allowability of the budget revision.

- Check the award itself for language about budget changes
- Check sponsor guidelines for language about budget changes

If the designated restriction is 005, this typically indicates that budget revisions are allowable.

FYI: Even if the code is 005, the SPS will check the award itself for any budget revision restrictions or budget revision thresholds.

BUDGET REVISION

Will Connect Carolina be able to process the budget revision?

- The project ID must be active and open (not ended)
- The project ID must have a positive balance
- The individual account codes must have a positive balance

FYI: InfoPorte runs a day behind changes in Connect Carolina

BUDGET REVISION – EXAMPLE #1

Transferring \$3,000 from Equipment to Personnel (F&A 55.5%)

- 1) Calculate indirect costs that will be needed: $\$3,000 \times 55.5\% = \$1,665$
- 2) Add the additional indirect costs to the \$3,000 that is being removed from Equipment: $\$3,000 + \$1,665 = \$4,665$
- 3) Enter the info into the Budget Revision table:

Project ID	Dept No.	Account Code	Current Budget	Budget Change	Revised Budget
5100000	621100	545100 - Equipment Budget	\$8,000.00	(\$4,665.00)	\$3,335.00
5100000	621100	510000 - Personnel Budget	\$15,000.00	\$3,000.00	\$18,000.00
5100000	621100	559000 - Indirect Cost Budget	\$50,000.00	\$1,665.00	\$51,665.00
Total Change				\$0.00	(must equal zero)

BUDGET REVISION – EXAMPLE #2

Transferring \$3,000 from Supplies to Equipment (F&A 55.5%)

- 1) Calculate the amount that will need to be removed from Supplies: $\$3,000 / 1.555 = \$1,929$
- 2) Subtract that amount from the total for Equipment to determine how much to remove from indirect costs: $\$3,000 - \$1,929 = \$1,071$
- 3) Enter the info into the Budget Revision table:

Project ID	Dept No.	Account Code	Current Budget	Budget Change	Revised Budget
<input type="checkbox"/> 5100000	621100	545100 - Equipment Budget <input type="checkbox"/>	\$8,000.00	\$3,000.00	\$11,000.00
<input type="checkbox"/> 5100000	621100	530000 - Supplies and Materials Budget <input type="checkbox"/>	\$15,000.00	(\$1,929.00)	\$13,071.00
5100000	621100	559000 - Indirect Cost Budget	\$50,000.00	(\$1,071.00)	\$48,929.00
Total Change				\$0.00	(must equal zero)

BUDGET REVISION

Departments can use OSP's budget load to check if a budget revision nets to \$0.

Input negative funds to represent funds moving out of that account code and input positive funds to demonstrate adding funds to that account code.

Supplies and Materials Budget		530000	(500)
Travel Domestic Budget		526100	
Travel Foreign Budget		526300	
Communications Budget		527000	
Printing and Binding Design		527510	500

BUDGET REVISION

FYI: Indirect Costs will calculate on the budget load; pay attention to this cell in the budget load to make sure that it matches the budget revision.

For example, this budget revision should include - \$357 in account code 559000 (Indirect Costs) to confirm that this total nets to \$0.

Indirect @55.5% on-campus		559000	(357)
Indirect @28% off-campus		559000	
Unobligated Restricted		559151	
Total			0

IS THIS BUDGET REVISION CORRECT?

This is the account code for subcontracts less than \$25k, which means it takes F&A

According to Budget Overview in Connect Carolina, this money is currently available

Project ID	Dept No.	Account Code	Current Budget	Budget Change	Revised Budget
584		569461 - Subcontracts: C&G Only	\$6,924.55	(\$6,924.55)	\$0.00
584		559000 - Indirect Cost Budget	\$3,843.12	(\$3,843.12)	\$0.00
155		530000 - Supplies & Materials Budget	\$14,344.75	\$10,767.67	\$25,112.42
155		559000 - Indirect Cost Budget	\$35,465.35	\$0.00	\$35,465.35
Total Change				\$0.00	(must equal zero)

It nets to zero

IS THIS BUDGET REVISION CORRECT?

This is the account code for subcontracts less than \$25k, which means it takes F&A

According to Budget Overview in Connect Carolina, this money is currently available

Project ID	Dept No.	
584		569461 - Sub
584		559000 - Indi
155		530000 - Sup
155		559000 - Indi



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Budget	Budget Change	Revised Budget
	(\$6,924.55)	\$0.00
	(\$3,843.12)	\$0.00
	\$10,767.67	\$25,112.42
	\$0.00	\$35,465.35
Age	\$0.00	(must equal zero)

It nets to zero

RESOURCES

- [UNC OSP Prior Approval Request Policy 500.03](#)
- [Prior Approval Request Form](#)
- [Prior Approval Request Form Instructions](#)
- [Uniform Guidance 2 CFR §200.308](#)
 - Expanded Authority
- [Research Terms and Conditions](#)
- [Research Terms & Conditions Prior Approval Matrix](#)

New OSP website coming soon!

Questions?



When requesting a prior authorization that also needs a subsequent budget revision, is the budget revision completed on the PAR form acceptable to move the BR forward as opposed to completing a separate BR form?

For multiple actions resulting from a prior approval request, it is preferred to have the sponsor prior approval on the PAR form (for example, adding a foreign subcontract). Then, if approved by the sponsor, a Budget Revision form can be submitted. However, if a PAR form is clearly marked with all actions requested (for example, a sponsor prior approval request, budget revision, addition of a new subcontract PSID, etc.), all actions can be processed as part of the PAR form.





THE UNIVERSITY
of NORTH CAROLINA
at CHAPEL HILL