

Prior Approval Policy

Policy Number: 600-016
Effective Date: April 3, 2007
Last Updated: June 14, 2025
Issuing Authority: Vice President for Research and Compliance
Responsible Offices: Sponsored Programs Office

Purpose:

This policy establishes the requirements for obtaining prior approval for changes to sponsored projects at Howard University, in compliance with:

- The Office of Management and Budgets Uniform Guidance for Federal Financial Assistance ([2 CFR 200.407](#)- Prior Written Approvals for federally funded awards)
- Sponsor (or agency) -specific terms and conditions (for federal and non-federal awards)
- Institutional policies

This policy applies to all externally funded sponsored awards and ensures that all modifications requiring sponsor prior approval or internal SPO approval are properly documented, reviewed and approved before implementation.

Policy:

It is Howard University's policy that any changes to a sponsored project requiring prior approval must be formally requested and approved before implementation.

- For federally funded awards: Requests follow Uniform Guidance ([2 CFR 400.407](#)), agency-specific guidelines, and award terms and conditions.
- For non-federally funded awards: The PI and SPO must review the sponsor's terms and conditions to determine prior approval requirements.
- For internal approvals under Expanded Authority: The PI must submit a request to SPO for review and approval per sponsor policy.

Retroactive requests for prior approval should be avoided and will only be considered under exceptional circumstances.

Business Process Description:

For changes that may affect the technical or scientific work of the project, the PI/PD should have preliminary discussions with his/her technical counterpart at the sponsor (i.e., the Project Officer or other similar individual). This technical counterpart is rarely the individual who can make an official decision on behalf of the sponsor, but the person's recommendation is often given significant weight by the official decision-maker.

The business process follows these key phases and applies to all prior approval request, for both federal and non-federally sponsored awards:

1. Determine prior approval requirement

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2. PI to prepare and submit a request to SPO with justification for proposed change in the OoR Ticket System.
3. Sponsor or Institutional Decision
 - a. If sponsor approval is required, SPO submits request and tracks the sponsor's response.
 - b. If expanded authority applies, SPO reviews and approves internally.
4. Once approved, SPO updates the award record in Cayuse, making any necessary financial adjustments in Workday if applicable. The PI must ensure compliance with approved changes and any conditions set by the sponsor.

Common Prior Approval Requests and Requirements:

Type of Change	Federal Awards (2 CFR 200.407 - Prior Approval Required?)	Non-Federal Awards (Subject to Sponsor Terms)	Additional Considerations
Rebudgeting (beyond agency/sponsor limits)	Yes	Yes, per sponsor terms	Many private sponsors restrict rebudgeting beyond 10-20% of the total award.
Change in Scope of Work	Yes	Yes	Significant changes require justification for the impact on research outcomes.
PI/Key Personnel Effort Reduction (>25%)	Yes	Yes, if sponsor requires	For non-federal awards, PI must confirm whether sponsor notification is needed.
PI Absence (>3 months)	Yes	Yes	Replacement requires sponsor approval.
International Travel (not in budget)	Yes	Yes, if not pre-approved	Must comply with Fly America Act for federal travel & sponsor policies for private funding.
Equipment Purchases (unbudgeted)	Yes, if exceeding federal threshold	Yes, per sponsor guidelines	Non-federal sponsors often require additional justification for large purchases.
Subawards Not Included in Proposal	Yes	Yes	Must justify need & subrecipient selection.
Use of Unobligated Balances	Yes, unless automatic carryforward allowed*	Yes, per sponsor	Corporate sponsors often require specific requests for carryforward funds.

*Sponsor may require notification if the amount exceeds 25%.

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Roles and Responsibilities:

Sponsored Programs Office (SPO):

Reviews prior approval requests and sponsor requirements. Determines if sponsor approval is needed or if Expanded Authority **applies**. Routes sponsor-required requests and tracks approval status. Documents approvals in Cayuse. Updates financial systems if prior approval affects budget allocations. Ensures compliance with financial reporting requirements.

Authorized Organizational Representative (AOR):

The institutional signatory authority housed within SPO, responsible for signing and accepting externally funded awards, including modifications or amendments that may result from prior approval requests.

Principal Investigator (PI):

Determines if prior approval is required based on sponsor terms. Prepares written request with justification and submits to SPO. Ensures compliance with sponsor conditions.

Office of General Counsel (OGC):

Reviews escalated requests involving contractual changes, intellectual property, or liability issues for both federal and private sponsors.

Compliance Considerations:

- Uniform Guidance ([2 CFR 200.407 - Prior Written Approvals](#)) applies to all federal awards.
- For all awards, Howard University must comply with sponsor-specific prior approval requirements.
- Failure to obtain required prior approval may result in noncompliance, audit findings, or financial penalties.
- All approvals must be documented and stored in Cayuse for compliance tracking.

Related Policies:

- Budget Revisions Policy
- Effort Reporting Policy
- Sponsored Program Equipment Management Policy
- Direct and Indirect Cost Charging Policy
- Student Stipends and Tuition Reimbursement Policy
- Subcontract Execution and Approval Policy

Forms and Links:

- Office of Management and Budget Guidance for Federal Financial Assistance 2 CFR Part 200.407. [eCFR :: 2 CFR 200.407 -- Prior written approval \(prior approval\)](#).
- This Overlay document provides the context for the RTC prior approvals and those federal sponsors that participate in the FDP and whose awards may be subject to the RTCs. [RTC Overlay to 2 CFR 200 - 11/12/2020](#)
- The National Science Foundation maintains, on behalf of the Federal Government's research sponsors, the Federal Demonstration Partnership Prior Approval Matrix that lists agency individual requirements for prior approval and those that are waived. [FDP Prior Approval Matrix](#)
- [Office of Research Ticketing System \(OoR\)](#).