

UAS Expanded Authorities

What is “Expanded Authorities”?

Federal regulations require prior approval from an awarding agency for a variety of project changes. In an effort to be more efficient, the federal government's Office of Management and Budget (OMB) has reduced the number of required prior approvals in the grants management process by issuing “expanded authorities.” That is, the grantee has been provided the authority to make certain (but not all) business decisions without seeking written permission from the agency. Not all agencies subscribe to Expanded Authorities.

Many federal agencies have waived cost-related prior approvals and permit an institution to decide budget changes under their "expanded authorities." These expanded authorities are automatically in force for most grants that support research, but they do not apply to contracts. In addition to the cost-related prior approval waiver, the following changes are permitted without prior agency approval:

- Pre-award costs up to 90 days prior to award (see more on this below)
- No Cost Extension: A one-time expiration date extension of up to 12 months
- Carryover of unobligated balances to subsequent funding periods

Note that while expanded authorities do apply to most federal grants, they do not apply to all and can vary somewhat by agency. Any terms included in the Notice of Award from the agency take precedence over authority provided by these expanded authorities.

Certain other changes, however, still require prior approval of the awarding agency:

- Changes in project scope or objective
- Change of PI or other key personnel
- Absence of the PI for more than three months, or a 25% reduction in effort spent on the project by the PI
- Need for additional funds
- Other changes specifically cited in the award or in agency-specific guidelines

Preaward Costs

A grantee organization may, **at its own risk**, incur obligations and expenditures to cover costs prior to the beginning date of an award provided the following criteria are met:

- The costs concerned are considered necessary for the conduct of the project;
- The costs are allowable under the POTENTIAL award; and
- The awarding component written prior approval is obtained when required.

Such preaward costs may be incurred within 90 days prior to the beginning date of the award without prior approval. Preaward costs incurred more than 90 days prior to the beginning date of the award require written prior approval. The awarding agency expects the grantee organization to be fully aware that preaward costs must not impair its ability to accomplish project objectives or in any way adversely affect the conduct of the project. Additionally, incurring costs prior to the award of a grant imposes no obligation on the awarding agency to make an award.