Prior Approval Requests for Funded Awards
Standard Operating Procedure

1. Purpose

This Standard Operating Procedure (SOP) establishes a consistent process for identifying, reviewing, obtaining, documenting, and maintaining sponsor-required prior approvals for sponsored projects. Most grant-making sponsors require approval before changes in scope, significant rebudgeting, key personnel changes, or other sponsor-defined actions on funded awards.

Principal Investigators (PIs) and their departmental staff must thoroughly review award notices to identify prior approval requirements. PIs, or departmental staff acting on their behalf, must submit all prior approval requests to the Office of Sponsored Research Administration (OSRA) for comprehensive review, institutional approval, and sponsor submission. PI approval of a proposed change does not replace required sponsor approval. This SOP supports compliance with sponsor terms and conditions, federal regulations, institutional policies, and award-specific requirements while reducing administrative and financial risk.

2. Scope

This SOP applies to all sponsored grant awards administered by Weill Cornell Medicine and outlines the process for reviewing and submitting sponsor prior approval requests. It applies to Principal Investigators, departmental administrators, OSRA staff, and other individuals responsible for managing sponsored awards.

This SOP covers administrative, financial, programmatic, and personnel changes requiring sponsor prior approval under award terms and conditions. Requests must undergo compliance review and be submitted by the Authorized Organizational Representative (AOR) when required. Changes may be implemented only after sponsor approval and any required institutional approvals have been obtained and documented.

3. Prerequisites

Before a prior approval request is submitted to a sponsor, the following must be completed:

- The need for sponsor prior approval has been identified based on the award terms and conditions.
- The PI has reviewed and approved the proposed change.
- Required supporting documentation has been prepared.
- Any necessary departmental, institutional, or compliance approvals have been obtained.
- The request has been reviewed by OSRA to ensure compliance with sponsor requirements and institutional policies.

4. Definitions

Authorized Organizational Representative (AOR): The institutional official authorized to submit applications, certifications, assurances, and prior approval requests to sponsors on behalf of Weill Cornell Medicine.

Carryover (Carryforward): The sponsor-authorized transfer of an unobligated balance from one budget period to a subsequent budget period. Carryover may be automatic or may require prior sponsor approval.

Change in Key Personnel: The withdrawal, absence, replacement, or other material change involving an individual designated as key to the project. Sponsor definitions vary: for NIH awards, key personnel are the individuals named in the Notice of Award (NOA); for other sponsors, key personnel may also include individuals identified as key in the funded proposal, even if they are not named in the award document. When the award terms do not clearly define key personnel, the broader proposal-based standard applies.

Change in Scope: A significant change in the project's objectives, aims, methodology, or activities from those originally approved by the sponsor, typically requiring prior approval.

Expanded Authorities: Authorities delegated by certain federal sponsors that allow recipient institutions to approve specified actions without obtaining prior sponsor approval, subject to applicable award terms and conditions (for example, an NIH first no-cost extension).

Foreign Component: A significant scientific element or segment of a project performed outside the United States, whether by the recipient or through a foreign organization, that may require sponsor prior approval.

Key Personnel: Individuals identified in the award whose participation is considered critical to the project's success and whose reduction in effort, absence, or replacement, or departure may require sponsor approval.

No-Cost Extension (NCE): An extension of the project period without additional sponsor funding to allow completion of the approved project aims.

Prior Approval: Written authorization required from a sponsor or authorized institutional official before a proposed action may be implemented.

Rebudgeting: The transfer of funds among budget categories. Rebudgeting that meets a sponsor threshold or affects a restricted category may require prior approval.

Reduction in Effort: A decrease in the committed effort of the PI or other key personnel that meets a sponsor-defined threshold or otherwise requires prior approval.

Significant Rebudgeting: A reallocation of project funds that meets the sponsor's threshold or criteria requiring prior approval.

Subaward: An agreement under which a portion of a sponsored project is carried out by another legal entity serving as a subrecipient.

Transfer Request: A request to relinquish or transfer a sponsored award from one recipient organization to another, subject to sponsor and institutional approval.

Unobligated Balance (UOB): The portion of awarded funds that has not been spent or committed and remains available at a given point in the project period.

5. Policy

All prior approval requests for sponsored awards must comply with the terms and conditions of the award, sponsor requirements, applicable regulations, and Weill Cornell Medicine policies.

Principal Investigators (PIs) and departmental administrators are responsible for identifying activities that may require sponsor prior approval and notifying OSRA before implementing any such changes.

Requests requiring sponsor prior approval must be submitted to OSRA sufficiently in advance of the proposed effective date to allow for institutional review and sponsor processing. No action requiring sponsor prior approval may be undertaken until the required approvals have been obtained and documented.

Failure to obtain required prior approval before implementing a change may result in noncompliance with award terms and conditions and may jeopardize funding, reimbursement of costs, or the continued administration of the award.

6. Roles and Responsibilities

Role	Responsibilities
OSRA	Provides guidance and templates; reviews requests for completeness, accuracy, and compliance; coordinates required institutional reviews and submission at OSRA level; communicates sponsor determinations; and maintains requests, correspondence, and final decisions in WRG-PT.
Principal Investigator (PI)	Identifies changes requiring prior approval and timely notifies their respective Department Administrators/Staff; reviews and approves proposed changes; provides scientific or programmatic justification and supporting documentation; and manages approved changes in accordance with sponsor and institutional requirements.
Departmental Administrators and Staff	Prepares accurate and complete request packages with the PI; obtains departmental approvals and coordinates required institutional and compliance approvals; submits packages to OSRA at least seven (7) business days before the sponsor's deadline; resolves outstanding issues; and supports documentation and implementation of approved changes.
Authorized Organizational Representative (AOR)	The designated institutional official within OSRA who is authorized to submit prior approval requests and related certifications or assurances to sponsors on behalf of Weill Cornell Medicine when required. OSRA Grants Specialists coordinate the review, institutional approval, and submission of these requests on behalf of the AOR.
Grants Accounting Team	Works with OSRA and the department, as applicable, to ensure approved changes are documented and reflected in institutional records and applicable award management systems.

Institutional and Compliance Reviewers	Conducts applicable reviews facilitated by OSRA when applicable and provides required approvals for proposed changes, including subrecipient arrangements, foreign components, and replacement key personnel.

7. Procedure

A. Identification of Prior Approval Requirement

1. The PI, departmental administrator, or other responsible personnel must review the award terms and conditions, sponsor policies, and applicable regulations when considering changes to a sponsored project. If a proposed action requires sponsor prior approval, the department must notify OSRA before implementing the change.

2. Common actions that may require prior approval include, but are not limited to:
    - Any action the Notice of Award (NOA) specifically identifies as requiring prior approval, including award-specific terms that deviate from the sponsor's standard terms and conditions
    - Change in scope of work
    - Key personnel changes (withdrawal or departure, replacement, extended absence, or reduction in effort that meets the sponsor's threshold)
    - No-cost extension requests
    - Adding foreign components
    - Carryforward of an unobligated balance (UOB) above the threshold established by the award terms
    - Significant rebudgeting
    - Addition of subawards not included in the original award budget
    - Change in recipient organization (award transfer)
    - Purchase of equipment not included in the approved budget, when required by the sponsor's terms
    - Pre-award costs incurred more than 90 days before the project start date
    - Rebudgeting of trainee costs on NIH training (T) awards
    - Rebudgeting of funds into or out of patient care costs on NIH awards, when restricted by the Notice of Award

B. Preparation of the Request

1. The department, in coordination with the PI, is responsible for preparing the prior approval request package.

2. The request package must include all sponsor-required documentation, which may include:
    - Written justification for the requested change
    - Revised budget and budget justification
    - Updated scientific or programmatic information
    - Revised effort commitments
    - Biosketches and/or Other Support for replacement key personnel
    - Quotes for large equipment purchases
    - Other sponsor-required forms or supporting documentation

3. Departments are encouraged to use OSRA templates and consult OSRA when preparing requests to support compliance with sponsor and institutional requirements. These resources cover common prior approval request types, including those requiring administrative and financial justifications.

4. The department is responsible for ensuring the accuracy and completeness of all submitted materials.

C. Departmental Review and Submission to OSRA

1. The department must review the request for completeness and obtain any required departmental approvals prior to submission to OSRA.

2. Departments are expected to submit complete request packages to OSRA at least seven (7) business days before the sponsor's deadline to allow time for institutional review and sponsor processing. Timelines vary by request type and sponsor guidelines. Requests submitted fewer than seven (7) business days before the deadline are processed on a best-effort basis and may not allow sufficient review time.

D. OSRA Review and Submission

1. Upon receipt, OSRA will review the prior approval request package to ensure all required sponsor documentation, forms, and supporting materials have been included.

2. OSRA will review completeness, accuracy, consistency with award information, and alignment with sponsor requirements and expectations. Checks may cover budgets, effort commitments, project details, and the adequacy of the justification.

3. OSRA may recommend revisions to strengthen the request, clarify proposed changes, or address missing or incomplete information prior to sponsor submission.

4. OSRA will not submit the request to the sponsor until all required documentation is received and identified issues are resolved. If additional information or modifications are needed, OSRA will return the request to the department and/or PI with feedback.

5. Once OSRA confirms that the request package is complete and meets sponsor requirements, OSRA will coordinate institutional submission to the sponsor, with submission by the Authorized Organizational Representative (AOR) when required. Submission does not authorize implementation; required approvals must first be obtained and documented.

E. Sponsor Determination & Award Management

1. Upon receipt of the sponsor's determination, OSRA will communicate the outcome to the department and PI and provide any relevant sponsor correspondence or approval documentation.

2. OSRA will work with the department and/or the Grants Accounting Team to ensure approved changes are appropriately documented in institutional records and reflected in

applicable award management systems. Coordination depends on the sponsor's determination and request type.

3. Following implementation of the approved changes, the PI and department are responsible for managing the award in accordance with the sponsor's approval, award terms and conditions, and institutional policies.

4. OSRA will maintain documentation of the prior approval request, sponsor correspondence, and final approval or denial in the applicable Weill Research Gateway–Proposal Tracking (WRG-PT) record.

8. Process Metrics

Timelines for prior approval requests may vary depending on the request type and sponsor requirements.

- Departments are expected to submit complete prior approval request packages to OSRA at least seven (7) business days before the sponsor's deadline.
- OSRA will review requests and communicate any required revisions or additional documentation to the department.[1]
- Upon receipt of a complete and finalized request package, OSRA will submit the request in accordance with sponsor requirements and applicable deadlines.
- Requests submitted fewer than seven (7) business days before the sponsor deadline will be processed on a best-effort basis but may not allow sufficient time for review.

9. Special Considerations

The likelihood of approval is directly related to overall compliance with awards terms and conditions. Pending or late reports, publications pending compliance, human study records pending update in ASSIST, and such requirements, when not fulfilled, will cause delays and pause agency review of the request.

The following considerations apply to common prior approval request types. Requirements vary by sponsor and award; departments must review the applicable notice of award, sponsor policy, and award terms and consult OSRA before implementing a proposed change.

No-Cost Extension Requests

- For extensions that may be approved under expanded authority, the *First No-Cost Extension Request Form* must be completed and signed.
- For all other extension requests, the request must include the proposed extension period, remaining work, the available balance, budget/spending plan, and progress report.
- For NIH awards, it must be submitted at least 30 days prior to award end date. Any request out of this timeline must include a substantial justification for the lateness.

Carryover Requests

- Include the unobligated balance, an explanation of why funds remain, a detailed plan and budget for their use, and the effect of the carryover on current-period activities.
- Carryover may not be implemented until sponsor approval is received when the award does not provide automatic carryover authority.
- For NIH awards, a carryover request generally cannot be submitted until the Federal Financial Report (FFR) has been submitted and accepted by NIH. Departments must confirm award-specific requirements with OSRA.

Reduction in Effort

- Review sponsor-specific thresholds for reductions in effort or extended absence by the PI or other key personnel.
- Include the affected individual, current and proposed effort, effective date and duration, justification, impact on project activities, and a plan for maintaining scientific and administrative oversight.
- Do not reduce effort before required sponsor approval is obtained.

Change in Key Personnel

- Notify OSRA promptly of a proposed absence, withdrawal, replacement, or other material change involving personnel identified by the sponsor as key.
- Include the reason for the change, effective date, impact on the project, transition and oversight plan, and sponsor-required documents for replacement personnel, such as a biosketch, Other Support, and effort commitment.
- The replacement individual must receive all required institutional and compliance approvals before participating in the project.

Change in Scope

- Changes to approved aims, methodology, outcomes, populations, locations, or other significant project activities must be evaluated to determine whether they constitute a change in scope.
- Provide a detailed scientific or programmatic justification, revised project information, budget implications, compliance impacts, and an explanation of how the proposed change affects the approved objectives.
- The change may not be implemented until OSRA confirms that all required approvals have been obtained.

Rebudgeting

- Review the award terms and sponsor policy to determine whether the proposed transfer of funds exceeds a prior approval threshold or involves a restricted budget category.
- Include the current and proposed budget, amount and categories affected, detailed justification, impact on project activities, and confirmation that the change does not create an unapproved change in scope.
- Rebudgeting requiring sponsor approval may not be implemented until written approval is received and documented.

Addition of a Subaward

- Adding a subrecipient not included in the approved award may require sponsor prior approval and institutional review of the proposed entity.
- Submit the proposed subrecipient's statement of work, detailed budget and justification, completed statement of intent form, required compliance documents, and an explanation of the subrecipient's role and selection.

- OSRA will coordinate required subrecipient review and confirm that the arrangement is appropriately classified and consistent with the approved project.

Foreign Component

- Notify OSRA before adding any significant scientific element or project activity performed outside the United States, whether by the recipient or through a foreign organization.
- Provide the foreign location and entity, scope of activities, participating personnel, budget, resources, compliance considerations, and justification for the proposed foreign involvement.
- OSRA will assess sponsor requirements and coordinate applicable institutional reviews, including export control and research compliance review.

Transfer Requests

- Refer to the *Departing PI with Sponsored Research SOP* for detailed guidance.

10. Related Documents

- Departing Principal Investigator with Sponsored Research (OSRA0016)