I. PURPOSE

Emory University (Emory) will adhere to federal and non-federal sponsors’ guidelines for changes to sponsored projects or awards including budget revisions, carry forward of funds from one budget year to another, and no-cost extensions. PI requests to revise budgets, must be submitted to the Post Award Administrator in the RAS. Please note that this SOP will primarily focus on the rebudgeting / budget revisions requests. If requesting no-cost extensions or carryover funds, please refer to No Cost Extension (#2013) and Carryover (#2015) SOPs.

II. INTRODUCTION

Federal and non-federal sponsors have varying standards that govern administrative changes. Rules vary by sponsor and by type of award. Some sponsors allow the grantee significant flexibility to approve budget revisions and modifications internally. Others place restrictions on these and other activities, such as moving funds between certain expense categories or making changes to the budget.

In order to avoid potential disallowances, it is important to understand and follow each sponsor's regulations concerning administrative changes. These requirements are outlined in the federal register and other regulatory documents. Individual awards and non-federal sponsors provide additional specific guidance.

III. PROCEDURES

In an effort to streamline the approval process for budget revisions, some federal and non-federal sponsors have authorized grantees to approve changes without seeking sponsor approval. This authority is limited and may not be exercised merely for the purpose of using unobligated balances (funds that remain uncommitted by contract at the end of a fiscal period) or where:

- The terms and conditions of the award prohibit the action.
- The budget changes would cause funds to be used for purposes other than those consistent with the original purpose under which the award was funded.

During the life of an award, it may become necessary to adjust the budget. PIs should exercise caution when requesting significant budget modifications as they may indicate changes to the approved statement of work. (One example: re-budgeting of patient care costs may be considered a change in scope.) If budget revisions necessitate any other changes to the award, refer to the appropriate SOP.
Required of all Rebudgeting Requests

1. Principal Investigator (PI):
   a. Prepares rebudgeting request justification on agency required form, if applicable.
   b. Makes initial determination whether any additional changes to the award are required (e.g., a change in scope).
   c. Notifies Post Award Administrator of intention to revise the budget via email and provides required documentation.

2. Post Award Administrator:
   a. Confirms that the budget revisions do not necessitate any other changes to the award, in consultation with PI. If any other changes are required (e.g., a change in scope), refer to the appropriate SOP.
   b. Reviews the award/contract terms for allowability and determines whether sponsor approval is required.

3. If sponsor approval is required, Post Award Administrator submits the “Request for Rebudgeting on Existing Awards” (via the SAM system).

4. If sponsor approval is required, FGC submits request to sponsor and notifies Post Award Administrator of approval/denial of request.

5. If sponsor approval is not required, FGC will review the request and notify the Post Award Administrator of approval/denial.

6. FGC and RAS will process the budget adjustments in Compass.

7. FGC and RAS will update any financial milestones on the FSR Milestone and Invoice Milestone pages if necessary.

8. Post Award Administrator notifies the PI and department of the change in budget.

Note that sponsor approval may be required under the following conditions, depending on sponsor guidelines:

- Re-budgeting of funds between direct and indirect cost categories.
- Re-budgeting of funds between or within restricted categories, e.g., clinical trials, construction costs, or patient support costs.
- Use of non-designated funds for the purchase of equipment or specialized goods and services.
- Issuing a subcontract that was not part of the proposal budget.
- Use of funds for domestic or international travel that was not part of the proposal budget.
- Transfer of funds resulting from a change in listed personnel.
- The terms and conditions of the award do not allow for the transfer of funds between direct cost categories.
- Or exceeds the percent of rebudgeting between categories than the sponsor allows.

It is important to review sponsor guidelines and notice of award, prior to rebudgeting. If there are questions about allowability, the Post Award Administrator should work with FGC to determine if rebudgeting is allowable or if sponsor approval is required.

Training grants (e.g., NIH T32) have very restrictive rebudgeting requirements. It is important to review the most current allowability prior to rebudgeting these grants. The requirements can be accessed on the NIH website: http://grants.nih.gov/training/index.htm
IV. ROLES AND RESPONSIBILITIES

Principal Investigator (PI):

- Understanding the sponsor guidelines and governing the award.
- Communicating with sponsor's technical representative and Post Award Administrator about significant changes in scope or award objectives.
- Submitting any changes in scope that have been approved by sponsor, to the Post Award Administrator.
- Monitoring the award for deviations from the approved budget.

Post Award Administrator:

- Identifying sponsor requirements concerning applicable terms and conditions of the award.
- Assisting the PI in understanding the applicable terms and conditions of the award.
- Submitting “Request for Rebudgeting on Existing Awards” to FGC via the Sam Kiosk.
- Upon notification of the sponsor's approval (or disapproval) of the proposed changes, communicate the decision to the PI and department.
- Process budget requests in Compass.
- Updating any financial milestones if necessary.

Finance: Grants and Contracts (FGC):

- Submitting rebudgeting requests to the sponsor if sponsor approval is required, and notifying the Post Award Administrator of the outcome.
- Approve rebudgeting requests if sponsor approval is not required and notifying the Post Award Administrator of the outcome.
- Process budget requests in Compass.
- Updating any financial milestones if necessary.

**************************************************************************END OF SOP**************************************************************************