Award Action Request (AAR) Guidance
For Grant Recipients

Updated: March 11, 2022
Original content developed by the Grants Management Division
Updated as needed by the Grants Online Program Management Office
Grants Online allows Recipients, or non-Federal entities, to submit Award Action Requests. Each item in the Award Action Request Index is linked to a guidance section. Recipients should also reference the Department of Commerce’s (DOC’s) terms and conditions. If applicable, reference the sponsoring Federal agency’s (e.g., NOAA, Census, or EDA) terms and conditions for additional information associated with an award. In addition, there may be specific guidance for construction grants.

**General Guidance and Department of Commerce Business Rules**

- The Department of Commerce requires that all Award Action Requests be approved by a Recipient Authorized Representative (RAR). Grants Online enforces this business rule by routing all requests through the RAR(s) prior to submission to the sponsoring Federal agency.
- An award end date may only be extended using:
  1. A funded amendment accompanied by an application (SF-424);
  2. A No-Cost Extension - Prior Approval **Waived** (Research Terms and Conditions);
  3. A No-Cost Extension - Prior Approval **Required**; or
  4. An Administrative Amendment.
- All Award Action Requests must be submitted prior to the award end date. Exceptions are noted below during the closeout period.
  1. Extension to Closeout; or
  2. Submit Additional Closeout Documents.
- Use of award funds (Federal or non-Federal) or the non-Federal entity’s provision of in-kind goods or services, for the purpose of transportation, travel, or other expenses for a Federal employee may raise appropriation augmentation issues. DOC policy prohibits the acceptance of gifts, including travel payments for Federal employees, from non-Federal entities or applicants – regardless of the source.
• An award must support research to be eligible for research-only authorities; this is determined by the Program Office during application review. Please refer to the Research Terms and Conditions for additional information. Grants Online enforces this business rule. If your organization is not eligible, the link to create the No Cost Extension – Prior Approval Waived (Research Terms and Conditions) is disabled.

• The Research Prior Approval Matrix identifies which prior approval the U.S. Department of Commerce waives or requires. This determination is subject to the discretion of the sponsoring Federal agency or any applicable Special Award Conditions. Awards subject to the Research Terms and Conditions may have additional requirements that result in prior approval required, including specific conditions referenced in 2 C.F.R. 200.208.

• Upon approval, the U.S. Department of Commerce requires that all Award Action Requests be accepted by a Recipient Authorized Representative (RAR). Grants Online enforces this business rule by routing all actions through the RAR(s) after approval by the sponsoring Federal agency.

• A change to an organization’s DUNS Number during the award period will result in termination of the award. Therefore it is imperative that changes to the DUNS Number be discussed with your Grants Officer prior to making any modifications.

• For additional grant recipient guidance that does not involve an Award Action Request, visit the Grant Recipient User Resources section of the Grants Online Program Management Office website.
Grants Online Processing Guidance

The AAR Process Map is accessible from the [Grants Online Process Maps](#) web page.

From the [Grant Recipient Resources](#) web page:
- Item 1b - Grants Online Recipient User Manual
- Item 2 - Grants Online Grant Recipient Quick Reference Guide

View the [Summary of Award Action Requests](#)

The steps below are excerpted from the Grantee Quick Reference Guide.

1. Click the **Awards** tab.
2. Click the **Search Awards** link. The Search Awards launch page is visible.
3. Input the Award Number and click the **Search** button. When the search results are returned, click the **Award Number** link that corresponds to the Award for which an Award Action Request will be created.
4. On the Grants File launch page, select the **Create Award Action Request** from the action dropdown menu. Click the **Submit** button.
5. The Award Action Request Index page, with the available AARs, is visible. Click the link that corresponds to the appropriate AAR. The requested page is displayed and available for completion. Enter the required data elements and click the **Save** button.
6. The AAR page is re-displayed and provides an opportunity to include attachments and/or input additional data. When the required information is entered, click the **Save and Start Workflow** button. Click the **OK** button to indicate the intent to advance to the next step.
7. The AAR is initially routed to the Inbox of the person who created the request. If the person who created the AAR is also the Authorized Representative, he/she can submit the request to the agency.
8. Otherwise the task must be sent to the organization’s Authorized Representative; the person with that role forwards the request to the sponsoring agency.
List of Award Action Requests

The list below identifies the Award Action Requests (AARs) that can be associated with an award. The list parallels the items on the Grants Online Award Action Request Index page. The items marked with an asterisk, if approved, result in an amendment to the award. Other Award Actions generate a request that requires approval by the Grants Officer. At the discretion of the Grants Officer, any AAR may result in an amendment.

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*This Award Action Request, if approved, results in an amendment to the award.
Award Action Requests Guidance

*No Cost Extension – Prior Approval Required

A No-Cost Extension - Prior Approval Required must be submitted to the sponsoring Federal agency **30 or more days prior to the award end date**. Grants Online does not enforce this business rule, but failure to meet this requirement is sufficient grounds for rejection of the request by the sponsoring Federal agency. No-cost extensions may not be exercised merely for the purpose of using unobligated funds. Approval will be made in Grants Online by the Grants Office.

When requesting the No Cost Extension the following conditions should not be applicable:

1. There are other specific conditions that prohibit the extension;
2. The extension requires additional Federal funds; or
3. The extension involves a change in program objectives or scope of the project.

**Assistance and Business Rules for:** No Cost Extension - Prior Approval Required

- The written request must clearly state why the extension is needed, the remaining activities that need to be completed, and what funds are still available to support the activity, along with a SF-424A budget of remaining
funds from your approved budget. A projected timetable to complete the portion(s) of the project for which the extension is being requested should be included.

- The request to extend the award period must be submitted to the Grants Online Federal Program Office at least 30 days prior to the expiration of the award.
- Any extension request submitted to the sponsoring Federal agency after the expiration of the award will be denied. Grants Online enforces this business rule. Other than an Extension to Closeout or closeout documents (including property reports/disposition), no Award Action Request can be submitted after the award expiration date. Only under extenuating circumstances (e.g., natural disaster) will exceptions be considered.
- Any extension request submitted with awards not in compliance (delinquent reports or SACs) will be returned to the recipient for resolution prior to review of the No Cost Extension request.
- Once submitted to the sponsoring Federal agency through Grants Online, the No Cost Extension action will automatically be forwarded to the appropriate Federal Program Officer for review and recommendation, and then to the Grants Office for approval.
- This action results in an amendment to the award. The Recipient must accept the amendment before the Award Action Request is considered complete. Tasks and notifications will be generated and routed to the Recipient after the Grants Office approves the amendment.
No Cost Extension – Prior Approval Waived (Research Terms and Conditions)

All Recipients governed by the Research Terms and Conditions have an opportunity to initiate a one-time No Cost Extension to the award period. The No Cost Extension encompasses a period up to one year without prior approval from the sponsoring Federal agency. To qualify for the No Cost Extension – Prior Approval Waived, the Grants Office must be notified in writing at least 10 days prior to expiration of the award and include a justification for the extension. Grants Online automatically enforces this business rule.

When requesting the No Cost Extension the following conditions should not be applicable: (1) there are other specific conditions that prohibit the extension; (2) the extension requires additional Federal funds; or (3) the extension involves a change in program objectives or scope of the project.

The authority to extend the award period without prior approval may not be exercised merely for the purpose of using unobligated funds. Recipients must maintain compliance with all terms and conditions of the award, including submission of required reports, or the No Cost Extension – Prior Approval Waived (Research Terms and Conditions) may be revoked.
Recipients performing research as a part of an award must exercise the No-Cost Extension - Prior Approval Waived (Research Terms and Conditions) before requesting a No-Cost Extension - Prior Approval Required. Grants Online does not enforce this business rule; however, enforcement is at the discretion of the Grants Office.

**Assistance and Business Rules for: No Cost Extension - Prior Approval Waived (Research Terms and Conditions)**

- The execution of the No Cost Extension - Prior Approval Waived (Research Terms and Conditions) by the Recipient is automatic in Grants Online. When the notification is submitted to the Federal agency by the Recipient, the award end date is immediately updated to reflect the new end date. In addition to the automatic update in Grants Online, there is a task for the Finance person to extend the funding availability end date in the Department of Treasury ASAP payment system. Notifications are sent to the Program Office and the Grants Office that indicate the new award end date.

- Grants Online enforces the 10 day rule. If the No Cost Extension - Prior Approval Waived (Research Terms and Conditions) is not submitted 10 or more days prior to the expiration of the award, the system will prohibit the request.

- Only one No Cost Extension - Prior Approval Waived (Research Terms and Conditions) can be requested per award. When the request has been made, the link and thus the option to create another request of the same type is disabled. Grants Online enforces this business rule.

- Per the Grants Online business rules, a No Cost Extension - Prior Approval Waived (Research Terms and Conditions) defaults to 1 year; a time less than one year cannot be specified. If the entire year is not needed to complete the project, the recipient may submit a Termination by Consent AAR to end the project early.
Extension to Closeout

The Extension to Closeout is the only Award Action Request that may be initiated after the award end date. Recipients have 120 days after the award end date (the closeout period) to submit all reports required by the terms and conditions of the award and to liquidate all obligations incurred. An extension to the closeout period should only be requested to complete the preparation of final reports and make final payments. Approval will be made in Grants Online by the Grants Office.

Assistance and Business Rules for: Extension to Closeout

- After the award period has expired, the Recipient no longer has access to the Create Award Action Request link on the Grants File launch page. Instead, there is a Request Extension to Closeout link. The Extension to Closeout link is available for 120 days after the period of performance end date.

- After the 120-day closeout period the Extension to Closeout link is not available. A request for an Extension to Closeout after the 120-day closeout period will typically be denied. However, requests for consideration based on extreme circumstances that prevented a timely request for an Extension
to Closeout must be submitted in writing by the RAR. Those requests will only be considered by the Grants Office on a case-by-case basis.

- The request for an Extension to Closeout must be submitted to the Federal agency and approved by the Grants Office; it is only after approval that the Extension to Closeout is in effect.
- An approved Extension to Closeout extends the due date for the final Federal Financial Reports and Performance Progress Reports. It also extends the date during which the Recipient can drawdown funds from the Department of Treasury ASAP payment system. (It may take up to 48 hours for the Extension to Closeout period to be updated in ASAP.)
- An approval of the extension to closeout does not normally result in an amendment to the award. However, the sponsoring Federal agency reserves the right to determine if the request results in an amendment. The Recipient will be notified by Grants Online of the approval or rejection of the request.
- Additional work on the award project is prohibited during the closeout period. If additional time is needed to complete the project, a No Cost Extension Required or No Cost Extension Prior Approval Waived must be submitted prior to the period of performance end date.
- If the final Financial Report (SF-425) and all other required reports are not provided by the expiration of the closeout period or approved extended closeout period, the Grants Office shall proceed with the enforcement remedies for non-compliance. Remedies are, but not limited to, withholding payments and withholding further Award Actions as allowed under the applicable administrative rules.
*Change in Scope*

Per §200.308(c)(1), Recipients must request prior approval from the sponsoring Federal agency for a change in scope or the objective of the project or program. Approval will be made in Grants Online by the Grants Office.

Actions likely to be considered a change in scope (and therefore require Federal agency pre-approval) include, but are not limited to, the following: (1) change in the specific goals and objectives approved at the time of the award; (2) shift of the research emphasis; (3) change in the approved project areas or species; or (4) change in the amount of work from the approved project description (e.g., number of samples collected).

In general, the Recipient Principal Investigator / Project Director may make changes in the methodology, approach, or other aspects of the project objectives. However, the Recipient must obtain prior approval from the sponsoring Federal agency for a change in the direction, type of research or training, or other areas that constitute a significant change from the aims, objectives, or purposes of the approved project. The grantee must make the initial determination of the significance of a change and should consult with their Program Office as necessary.
**Assistance and Business Rules for: Change in Scope**

- The justification for the Change In Scope may either be entered in the text box or included as an attached file.
- Any Change In Scope that results in a decrease in Federal and/or Recipient funding must be accompanied by an SF-424A (or SF-424C for construction awards) and a budget narrative describing the planned expenditure of the remaining funds. The request for a decrease in funding must be clearly and prominently stated.
- If a Change in Scope request includes a request for a No Cost Extension, you must also submit a No Cost Extension - Prior Approval Required Award Action Request. Please contact your Grants Officer to determine whether these requests can be combined or separate.
- If a Change in Scope request includes re-budgeting, a re-budget request must be accompanied with the Change in Scope request.
- Upon submission to the sponsoring Federal agency, the Change in Scope request will automatically be routed to the correct Federal Program Officer for review and approval.
- An approved Change in Scope will always result in an amendment to the award. Upon approval by the Grants Office, the Recipient will be notified of the approved amendment and tasks will be generated for acceptance. To be in effect, the amendment must be accepted by the Recipient.
- **Basis for denial of the request:**
  - Any request for a reduction in match for a competitively awarded grant or cooperative agreement will be denied by the Grants Office of the sponsoring Federal agency.
  - Any request for a reduction in match for a grant or cooperative agreement which has a statutory match in place will be denied by the Grants Office of the sponsoring Federal agency.
Change in Principal Investigator / Project Director (PI/PD)

If the Recipient has a change in key personnel, other than a Principal investigator (PI) or Project Director (PD), they should submit an Award Action Request for a Change in Key Person Specified in the Application instead. Approval will be made in Grants Online by the Grants Office.

**Assistance and Business Rules for: Change in Principal Investigator / Project Director**

- Please discuss the request for a Change in PI/PD with your Federal Program Office prior to submission of the Award Action Request through Grants Online.
- The selection of an application for award is made, in part, based upon the qualifications of the PI/PD. The Federal agency may wish to consider alternative remedies, (e.g., transferring the award to the current PI/PD’s new organization).
- All of the new PI/PD fields must be completed. As an alternative to typing in the PI/PD information, you can click the Search PI/PD link. That action displays all of the personnel from your organization that have the Recipient...
PI/PD role. Click the **Select** link for the person whose information should be used to update the Change in Principal Investigator / Project Director screen.

- Include a resume or Curriculum Vitae for the proposed PI/PD.
- Upon submission to the sponsoring Federal agency, the Change in PI/PD request will automatically be routed to the correct Federal Program Officer for review and approval.
- The approval of a Change in PI/PD request does not normally result in an amendment to the award. However, the sponsoring Federal agency reserves the right to determine if the request results in an amendment. The Recipient will be notified by Grants Online of the approval or rejection of the request.
- After approval of a Change in PI/PD request, the Recipient Administrator(s) will be notified and assigned a task to Manage Recipient Users. The Recipient Administrator should assign the new PI/PD to the award and remove the former PI/PD, in Grants Online. Federal agency personnel **cannot** perform this task.
- Because the assigned Recipient Investigator(s) receives notifications of required Performance Progress Reports, it is imperative that the **current PI/PD** be associated with the award in Grants Online.
- Changing the PI/PD associated with an award using the Grants Online Manage Recipient Users or View/Manage Award-related Personnel feature **does not** constitute receipt of the notification and approval by the Federal agency.
- Adding Recipient Investigators (who are not specified on the application) to the award using the Grants Online Manage Recipient Users or View/Manage Award-related Personnel features is not prohibited. The Department of Commerce has no objection to giving personnel a view capability into specific awards. However, this action should be performed at the discretion of your organization's Recipient Administrator (in consultation with the Authorized Representative).
• **NOTE: For MBDA Award Recipients:** A change in the PI/PD request must be accompanied by a resume that specifies the qualifications of the proposed PI/PD. In addition, an original commitment letter from the proposed PI/PD must be scanned and attached to the Grants Online request.

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**Foreign Air Carrier for Travel**

![Foreign Air Carrier for Travel - NA20GOT9980231](image)

The Recipient shall comply with the provisions of the Fly America Act (49 USC § 40118(b)). The requirements of the Fly America Act are found at 41 CFR §§ 301-10.131 through 301-10.143. The Fly America Act requires that Federal travelers and others performing U.S. Government-financed foreign air travel use U.S. air carriers, to the extent that service by such carriers is available. Refer also to the Department of Commerce Financial Assistance Standard Terms and Conditions. Approval will be made in Grants Online by the Grants Office.

Foreign air carriers may be used only in specific instances, (i.e., when a U.S. air carrier is unavailable, or use of U.S. air carrier service will not accomplish the
Agency's mission). Use of a foreign air carrier may also be used if bilateral or multilateral agreements permit such travel pursuant to 49 USC § 40118(b). Information on current bilateral and multilateral agreements can be accessed from the following link: Fly America Act.

When requesting approval, the Recipient must provide a justification. In accordance with guidance provided by 41 CFR § 301-10.142, the Recipient must provide the Grants Office with the following: (a) traveler name(s); (b) dates of travel; (c) origin and destination of travel; (d) detailed itinerary of travel that includes the name of the air carrier and flight number for each leg of the trip; and (e) a statement explaining why the traveler(s) meet(s) one of the exceptions to the regulations.

Failure to adhere to the provisions of the Fly America Act will result in the Recipient not being reimbursed for any transportation costs involving improper use of a foreign air carrier.

Assistance and Business Rules for: Foreign Air Carrier for Travel

- If a foreign air carrier is anticipated for travel, the Recipient must receive prior approval from the Grants Office. Detailed and specific justification must be submitted along with the Award Action Request.
- If the use of a foreign air carrier is pursuant to a bilateral agreement, the Recipient must provide the Grants Office with a copy of the agreement.
- Upon submission to the sponsoring Federal agency, the foreign air carrier for travel request will automatically be routed to the correct Federal agency personnel for review and approval.
- The approval of a foreign air carrier for a travel request does not normally result in an amendment to the award. However, the sponsoring Federal agency reserves the right to determine if the request results in an amendment. The Recipient will be notified by Grants Online of the approval or rejection of the request.

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Per §200.308(c)(2), Recipients must request prior approval from the sponsoring Federal agency for the Change in a Key Person Specified in the Application or the Federal award. If the Recipient has a change in Principal Investigator (PI) or Project Director (PD), they should submit an Award Action Request for a Change in Principal Investigator / Project Director instead. Approval will be made in Grants Online by the Grants Office.

**Assistance and Business Rules for:** Change in Key Person Specified in the Application

- Please discuss the request for a Change in Key Person Specified in the Application with your Federal Program Office prior to submission of the Award Action Request through Grants Online.
- All of the new key person fields must be completed. As an alternative to typing in the key person’s information, you can click the Search Person link. That action displays all personnel from your organization that have a Recipient User role. Click the Select link for the person whose information
you would like to use to update the Change in Key Person Specified on the Application screen.

- Include a resume or Curriculum Vitae for the proposed key person.
- Upon submission to the sponsoring Federal agency, the Change in Key Person Specified in the Application request will automatically be routed to the correct Federal agency personnel for review and approval.
- The approval of a Change in Key Person Specified in the Application request does not normally result in an amendment to the award. However, the sponsoring Federal agency reserves the right to determine if the request results in an amendment. The Recipient will be notified by Grants Online of the approval or rejection of the request.
- After approval of a Change in Key Person Specified in the Application request, the Recipient Administrator(s) will be notified and assigned a task to Manage Recipient Users. The Recipient Administrator(s) should assign the new key person to the award and remove the former key person. Federal agency personnel cannot perform this task.
- Because the assigned key person(s) receives notifications of required Performance Progress Reports and/or Federal Financial Reports, it is imperative that the current key person(s) be associated with the award in Grants Online.
- Changing the key person(s) associated with an award using the Grants Online Manage Recipient Users or View/Manage Award-related Personnel features does not constitute notification or approval by the Federal agency.
- An addition of key people (who are not specified on the application) to the award using the Grants Online Manage Recipient Users or View/Manage Award-related Personnel feature is not prohibited. The Department of Commerce has no objection to giving personnel a view capability into specific awards. However, this action should be performed at the discretion of your organization's Recipient Administrator (in consultation with the Authorized Representative).
Disengagement for More than 3 Months, or 25% Reduction by Project Director or PI

Per §200.308(c)(3), Recipients must request prior approval from the sponsoring Federal agency for the approved Principal Investigator or Project Director’s disengagement from the project for more than three months, or a 25 percent reduction in time devoted to the project. Approval will be made in Grants Online by the Grants Office.

Assistance and Business Rules for: Disengagement for More than 3 Months, or 25% Reduction by PI/PD

- If attaching a justification, please enter *See attachment* in the justification text box.
- Upon submission to the sponsoring Federal agency, the Disengagement for More Than 3 Months or 25% Reduction by PI/PD, the request will automatically be routed to the correct Federal agency personnel for review and approval.
- The approval of a Disengagement for More Than 3 Months or 25% Reduction by PI/PD request does not normally result in an amendment to the award. However, the sponsoring Federal agency reserves the right to determine if the request results in an amendment. The Recipient will be notified through Grants Online of the approval or rejection of the request.
Many awards contain Specific Conditions (also referred to as Special Award Conditions) that require evidence of completion. Specific and or Special Award Conditions examples are as follows: special fishing permits, environmental assessments, property deeds, building permits, etc. Approval will be made in Grants Online by the Grants Office.

**Assistance and Business Rules for: Satisfy Specific Conditions**

- The specific conditions are available in a drop-down list on the Award Action Request details page. Please choose the appropriate condition that is being satisfied.
  - After selecting the Specific Condition, the SAC Description text box will automatically be populated with the Specific Condition details.
  - The due date is not available for data entry; this is auto-populated with information associated with the selected Specific Condition, if applicable.
• Fill out the justification in the text area and attach any relevant files after you click the **Save** button.
• When the Recipient submits the Specific Condition to the sponsoring Federal agency, the Satisfy Specific Conditions request will automatically be routed to the appropriate Federal agency personnel for review and approval.
• The approval of a Satisfy Specific Conditions request does not normally result in an amendment to the award. However, the sponsoring Federal agency reserves the right to determine if the request results in an amendment. The Recipient will be notified by Grants Online of the approval or rejection of the request.
*Inclusion of Costs Requiring Prior Approval in Cost Principles*

Per §200.308(c)(4), Recipients must request prior approval from the sponsoring Federal agencies for the inclusion of costs that require prior approval in accordance with Subpart E – Cost Principles of this part. Approval will be made in Grants Online by the Grants Office. These include those referenced in 200.407 Prior Written Approval (e.g., equipment).

**Assistance and Business Rules for: Inclusion of Costs Requiring Prior Approval in Cost Principles**

- The cost amount and a justification are required.
- If attaching a justification, please enter *See attachment* in the justification text box.
- Upon submission to the sponsoring Federal agency, the inclusion of the cost request will automatically be routed to the correct Federal agency personnel for review and approval.
- This action results in an amendment to the award. The Recipient must accept the amendment before the Award Action Request is considered complete. Tasks and notifications will be generated and routed to the Recipient after the Grants Office approves the amendment.

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**Transfer of Funds Budgeted for Participant Support Costs to Other Categories of Expense**

Per §200.308(c)(5), Recipients must request prior approval from the sponsoring Federal agency for the transfer of funds budgeted for participant support costs as defined in §200.75 to other categories of expense. Approval will be made in Grants Online by the Grants Office.

**Assistance and Business Rules for: Transfer of Funds Budgeted for Participant Support Costs to Other Categories of Expense**

- The transfer amount and a justification are required.
- If attaching the justification, please enter *See attachment* in the justification text box.
- Upon submission to the sponsoring Federal agency, the Transfer of Funds Budgeted for Participant Support Costs to Other Categories of Expense request will automatically be routed to the correct Federal agency personnel for review and approval or rejection.

- The approval of a Transfer of Funds Budgeted for Participant Support Costs to Other Categories of Expense request does not typically result in an amendment to the award. However, the sponsoring Federal agency reserves the right to determine if the request results in an amendment. The Recipient will be notified by Grants Online of the approval or rejection of the request.

*Subaward, Transfer or Contract Out Work Under the Award if Not Described in the Approved Application*
Per §200.308(c)(1)(6), Recipients must request pre-approval from the awarding Federal agency to take the following actions: subaward, transfer or contract out work under the award if not described in the approved application. The need for pre-approval is applicable to fixed amount subawards as described in §200.333 Fixed Amount Subawards, unless described in the application and funded in the approved Federal award. This provision does not apply to the acquisition of supplies, material, equipment or general support services. Approval will be made in Grants Online by the Grants Office.

**Assistance and Business Rules for: Subaward, Transfer or Contract Out Work Under the Award if Not Described In The Approved Application**

- You must choose the method of selection (Competitive or Non-Competitive), a description of the work along with budget for each subaward, and a justification if the subaward was chosen non-competitively.

- Upon submission to the sponsoring Federal agency, the subaward/transfer/contract out work request will automatically be routed to the appropriate Federal agency personnel for review and approval.

- This action results in an amendment to the award. The action is not considered complete until the Recipient accepts the amendment. Tasks and notifications will be generated for the Recipient after the Grants Office approves the amendment.

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In accordance with 2 C.F.R. § 200.308(f), transfers of funds by the recipient among direct cost categories are permitted for awards in which the Federal share of the project is equal to or less than the simplified acquisition threshold. For awards in which the Federal share of the project exceeds the simplified acquisition threshold, transfers of funds among direct cost categories must be approved in writing by the Grants Officer when the cumulative amount of such direct costs transfers exceeds 10 percent of the total budget as last approved by the Grants Officer. The 10 percent threshold applies to the total Federal and non-Federal funds authorized by the Grants Officer at the time of the transfer request. This is the accumulated amount of Federal funding obligated to date by the Grants Officer along with any non-Federal share. The same requirements apply to the cumulative amount of transfer of funds among programs, functions, and activities. This transfer authority does not authorize the recipient to create new budget categories within an approved budget without Grants Officer’s approval. Any transfer that causes any Federal appropriation, or part thereof, to be used for an unauthorized purpose is not and will not be permitted. In addition, this provision does not prohibit the recipient from requesting Grants Officer approval for revisions to the budget. See 2 C.F.R. § 200.308 (Revision of budget and program plans) (as applicable) for specific requirements concerning budget
revisions and transfer of funds between budget categories. Approval will be made in Grants Online by the Grants Office.

Requests for prior approval of any budget revisions that transfer funds among line item cost categories should be submitted using the SF-424A (or other OMB-approved budget form). On the SF-424A, specify the total approved budget for the award versus the requested revisions and a detailed budget narrative explaining the transfer of funds. The revised budget request should be submitted to the Federal Program Office. That person will forward the request and a Program Office recommendation to the Grants Office. The Grants Office will make the final determination and communicate its decision in writing. Requests to change and/or add program objectives or tasks that do not involve a transfer of funds between direct cost categories do not constitute a budget revision; therefore those requests do not require submission of the SF-424A. Any programmatic changes should be submitted directly to the Federal Program Officer. That person forwards the request and the Program Officer recommendation to the Grants Officer. The Grants Office will make the final determination and communicate its decision via a CD-451, Amendment to Financial Assistance Award.

The Recipient is prohibited from expending award funds (Federal and/or non-Federal) or the Recipient’s provision of in-kind goods or services, for the purposes of providing transportation, travel, or any other expenses for any Federal employee unless specifically authorized in the award document.

**Assistance and Business Rules for: Re-budget – Prior Approval Required**

- The Recipient must attach a new SF-424A that includes a description of the re-budget; the deviation from the approved budget and a detailed budget narrative explaining the proposed funds transfer. The 424A should show the total funding for the award.
- Once submitted to the sponsoring Federal agency through Grants Online, the re-budget action is automatically forwarded to the correct Federal agency personnel for approval.
● This action results in an amendment to the award. The Recipient must accept the amendment before the Award Action Request is considered complete. Tasks and notifications will be generated and routed to the Recipient after the Grants Office approves the amendment.

● If a re-budget request includes a request for a No Cost Extension, then you must also submit a No Cost Extension Award Action Request.

Re-budget – Prior Approval Waived (Research Terms and Conditions)

All Recipients governed by the Research Terms and Conditions are granted authority to transfer amounts budgeted for indirect costs to absorb increases in direct costs, or vice versa, without prior approval from the sponsoring Agency. Recipients can continue to submit budget revisions using the SF-424A (or other OMB-approved budget form), but must report budget revisions on the Research Performance Progress Report (RPPR).

The Recipient is prohibited from expending award funds (Federal and/or non-Federal) or the Recipient’s provision of in-kind goods or services, for the purposes of providing transportation, travel, or any other expenses for any Federal employee unless specifically authorized in the award document. Prior approval is
required for the transfer of funds budgeted for participant support costs to other categories of expense, and for transfer of funds between construction and non-construction activities.

**Assistance and Business Rules for: Re-budget - Prior Approval Waived (Research Terms and Conditions)**

- The execution of the Re-budget - Prior Approval Waived (Research Terms and Conditions) by the Recipient is automatic in Grants Online. When the Award Action Request is submitted to the Federal agency by the Recipient, notifications are sent to the Program Office and the Grants Office. This action does not require prior approval by the sponsoring Federal agency, and does not typically result in an amendment to the award.

- Recipients should attach a revised SF-424A describing the re-budget plan. The re-budget plan should include the total approved budget versus the requested revisions and a detailed budget narrative explaining the proposed funds transfer.

- Per the Research Terms and Conditions - Prior Approval Matrix, prior approval is waived for re-budgeting among direct cost categories and is waived for transferring amounts budgeted for indirect costs to absorb increases in direct costs and vice versa.

- Recipients, subject to specific conditions under 2 C.F.R. 200.208, will not be permitted to implement an action for Prior Approval Waived (Research Terms and Conditions).
Recipients are permitted pre-award costs up to 90 calendar days at their risk, without prior approval. Per §200.308(e)(1), expenses more than 90 calendar days pre-award require prior approval from the sponsoring Federal agency. All costs incurred before the sponsoring Federal agency gives the award are at the Recipient’s risk. The awarding Federal agency is under no obligation to reimburse pre-award costs if the Recipient does not receive a Federal award or the Federal award is less than anticipated and inadequate to cover pre-award costs. Approval will be made in Grants Online by the Grants Office.
**Assistance and Business Rules for: Pre-Award Costs More Than 90 Days**

- This Award Action Request is only applicable if the Recipient needed to incur pre-award costs during the period that was more than 90 days prior to the start of the award.
- Upon submission to the sponsoring Federal agency, the pre-award cost request will automatically be routed to the correct Federal agency personnel for review and approval.
- The approval of a pre-award cost request does not normally result in an amendment to the award. However, the sponsoring Federal agency reserves the right to determine if the request results in an amendment. The Recipient will be notified by Grants Online of the approval or rejection of the request.

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**Termination by Consent**

[Image of a form titled 'Termination by Consent - NA20GOT9980231']

Per §200.340, the Federal award may be terminated (in whole or in part) with the consent of the non-Federal entity. In the instance of termination, the sponsoring Federal agency and the non-Federal entity must agree upon the termination
conditions. The termination process may be initiated by the non-Federal entity when they send the sponsoring Federal agency or pass-through entity written notification that specifies the reason(s) for termination. In either case, notice of termination must include the termination effective date. Refer to §200.340 for additional information. Approval will be made in Grants Online by the Grants Office.

**Assistance and Business Rules for: Termination by Consent**

- This Award Action Request may be used if the Recipient finishes the project tasks significantly prior to the award end date and completes or anticipates completion of the award financial transactions within 90 days of the requested early termination date.
- Do not submit this Award Action Request if there is a change in scope for the award. In that case, discuss the change in scope with your Program Office and submit a Change in Scope Award Action Request.
- Upon submission to the sponsoring Federal agency, the Termination request will automatically be routed to the correct Federal agency personnel for review and approval.
- This action results in an amendment to the award. The action is not complete until the Recipient accepts the amendment. Tasks and notifications will be generated for the Recipient after the Grants Office approves the amendment.
Submit Additional Closeout Documents

This Award Action Request is available for all awards under all Department of Commerce Bureaus using Grants Online. However, the terms and conditions of the award determine if additional closeout documents are appropriate.

Assistance and Business Rules for: Submit Additional Closeout Documents:

- This Award Action Request will be available for use until the Final Reports due date. An Extension to Closeout must be requested to extend the availability of this Award Action Request.
- Grant Recipients should contact their Grants Specialist if there is a question about the use of this Award Action Request.
This Award Action Request is applicable to bureaus that follow the ASAP Agency Review process. Since NOAA does not follow the ASAP Review process they do not have the option to use the ASAP Drawdown Request.

**Assistance and Business Rules for: ASAP Drawdown Request**

- The first step requires that the user supply the required (and any relevant optional) information on the ASAP Drawdown Request form. In addition to completing the form, the EDA user must attach a copy of the SF-270.
- To attach a copy of the SF-270 and other relevant documents the user must click the Save button. Clicking the Save button makes the attachment widget available to the user.
When completing the ASAP Drawdown Request in Grants Online, there are two important data elements on the SF-270 that require discussion.

- **Total Expenditures to Date** (line 11g) refers to the Federal Share of line 11e. Line 11g represents the Federal share of the total expenditures to date.
- **Total Federal Funds Previously Requested** (line 11h), refers to the previously-requested Federal payments.

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The information entered for the Grants Online ASAP Drawdown Request screen must match the information in the SF-270.

When the Grants Specialists accepts the Drawdown Request, the Grant Recipient receives an email notification indicating that the request has been approved.
● Approval of the Award Action Request does not result in the automatic release of funds from the ASAP system. To complete the process, the Recipient Authorized Representative must log in to the ASAP System and request the funds approved for drawdown. Subsequently the ASAP Authorizer will need to release the funds.

● If there are questions associated with using this Award Action Request, non-NOAA Grant Recipients should contact their Grants Specialist.
This Award Action Request is available for requests that are not relevant to any other category, including requests that require prior approval per §200.407 that are not separately identified in this guidance. Please work with your Federal Program Office to determine if you should submit the Other Award Action Request. Approval will be made in Grants Online by the Grants Office.

**Assistance and Business Rules for: Other**

- Use this Award Action Request if you have a request that does not fit under any other category. Please work with your Federal Program Office and Grants Office to determine if you should submit the Other Award Action Request.
- The Other Award Action Request requires both a description and a justification. Please provide sufficient information in both text boxes to allow the sponsoring Federal agency personnel to make a determination.
- Upon submission to the sponsoring Federal agency, the Other Award Action Request will automatically be routed to the correct Federal agency personnel for review and approval.

*AAR Index*
## Award Action Request Summary

Below is a chart that indicates which Award Action Requests require approval and/or result in an Amendment. The numbers specified in the chart below correspond to the Award Action Request (AAR) process map (i.e., AAR-4 references the Extension to Closeout process map).

<table>
<thead>
<tr>
<th>Award Action Request</th>
<th>Grants Officer Approval?</th>
<th>Authorized Representative Acceptance is required after approval</th>
<th>If AAR is approved, results in an Amendment</th>
</tr>
</thead>
<tbody>
<tr>
<td>*No Cost Extension – Prior Approval Required</td>
<td>Yes (AAR-2)</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>No Cost Extension – Prior Approval Waived (Research Terms and Conditions)</td>
<td>No (AAR-3)</td>
<td>N/A</td>
<td>N/A</td>
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<tr>
<td>Extension to Closeout</td>
<td>Yes (AAR-4)</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>*Change in Scope</td>
<td>Yes (AAR-1)</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Change in Principal Investigator / Project Director</td>
<td>Yes (AAR-1)</td>
<td>No</td>
<td>Depends upon Sponsoring Agency</td>
</tr>
<tr>
<td>Foreign Air Carrier for Travel</td>
<td>Yes (AAR-1)</td>
<td>No</td>
<td>Depends upon Sponsoring Agency</td>
</tr>
<tr>
<td>Change in Key Person Specified in the Application</td>
<td>Yes (AAR-1)</td>
<td>No</td>
<td>Depends upon Sponsoring Agency</td>
</tr>
<tr>
<td>Disengagement for More than 3 Months, or 25% Reduction by Project Director or PI</td>
<td>Yes (AAR-1)</td>
<td>No</td>
<td>Depends upon Sponsoring Agency</td>
</tr>
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<td>Award Action Request</td>
<td>Grants Officer Approval?</td>
<td>Authorized Representative Acceptance is required after approval</td>
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</tr>
<tr>
<td>Satisfy Specific Conditions</td>
<td>Yes (AAR-1)</td>
<td>No</td>
<td>Depends upon Sponsoring Agency</td>
</tr>
<tr>
<td>*Inclusion of Costs Requiring Prior Approval in Cost Principles, as stated per 200.407 Prior Written Approval (e.g., equipment)</td>
<td>Yes (AAR-1)</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td><strong>Transfer of Funds Budgeted for Participant Support Costs to Other Categories of Expense</strong></td>
<td>Yes (AAR-1)</td>
<td>No</td>
<td>Depends upon Sponsoring Agency</td>
</tr>
<tr>
<td>*Subaward, Transfer or Contract Out Work Under the Award if Not Described in the Approved Application</td>
<td>Yes (AAR-1)</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>*Re-budget – Prior Approval Required</td>
<td>Yes (AAR-1)</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Re-budget – Prior Approval Waived (Research Terms and Conditions)</td>
<td>No (AAR-1)</td>
<td>No</td>
<td>N/A</td>
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<td>Pre-Award Costs More Than 90 Days</td>
<td>Yes (AAR-1)</td>
<td>No</td>
<td>Depends upon Sponsoring Agency</td>
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<td>*Termination by Consent</td>
<td>Yes (AAR-1)</td>
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<td>Submit Additional Closeout Documents</td>
<td>Yes (AAR-1)</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>ASAP Drawdown Request (ASAP Vendors Only)</td>
<td>Yes (AAR-5)</td>
<td>No</td>
<td>No</td>
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<tr>
<td>Other</td>
<td>Yes (AAR-1)</td>
<td>No</td>
<td>Depends upon Sponsoring Agency</td>
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</table>