



# UC San Diego

## Policy & Procedure Manual

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[Search](#) | [A-Z Index](#) | [Numerical Index](#) | [Classification Guide](#) | [What's New](#)

### CONTRACTS AND GRANTS (RESEARCH)

**Section: 150-61**

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### ORGANIZATIONAL PRIOR APPROVAL SYSTEM REQUIREMENTS FOR NATIONAL SCIENCE FOUNDATION (NSF) RESEARCH GRANTS

#### I. REFERENCES AND RELATED POLICIES

- A. [NSF Grant Policy Manual, Revised April, 1983](#)
- B. [NSF Grant General Conditions \(F.L. 200, October 1987\)](#)
- C. UCSD Policy and Procedure Manual (PPM)
  - [150-65](#) Request for Approval Procedures under Organizational/Institutional Prior Approval Systems (OPAS/IPAS)
  - 380-4 Budget Adjustment Journal Preparation Procedures
  - 380-5 Budget Adjustments to Extramural Funds (Federal, State, Local Government, and Private Contracts, Grants and Donations)
  - [522-2](#) Equipment Screening
  - [523-10.1](#) Independent Consultants

#### II. INTRODUCTION

The purpose of this policy is to outline the procedure to follow in completing the *Request for Approval Under the Organizational Prior Approval System (OPAS)* to expend funds under National Science Foundation (NSF) grants.

#### III. POLICY

Effective October 1, 1987, the NSF revised its Grant General Conditions, NSF F.L. 200, which allows grantee institutions to expend monies and rebudget certain funds in their research grants without referral to NSF for prior approval.

Principal Investigators or Department Administrators should request assistance from the OCGA concerning any proposed NSF related budget deviation not covered by the NSF Grant Policy Manual or by this issuance.

#### IV. PROCEDURES

##### A. Preparation of Forms

1. If the Principal Investigator (PI) has the authority to rebudget funds, in accordance with Section VII. of this issuance, a *Budget Adjustment Journal* is all that is required. This should be prepared according to instructions contained in PPM 380-4.

**University of California San Diego Policy – PPM 150 - 61**  
**PPM 150 – 61 Organizational Prior Approval System Requirements for National Science Foundation (NSF) Research Grants**

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2. If authority to expend or rebudget funds must be obtained through the Organizational Prior Approval System (OPAS), the Principal Investigator then prepares a *Request for Approval Under Organizational Prior Approval System* (see [PPM 150-65](#)) and a *Budget Adjustment Journal* (see PPM 380-4). When the Principal Investigator is requesting approval to purchase an item of equipment, the *Purchase Order Requisition* and an [Equipment Screening Certification](#) form (if necessary) must also be attached. The entire package should then be forwarded via the MSO to the Department Chair and the Contract and Grant Officer, OCGA, for review and approval.
3. If NSF prior approval is required, the PI must prepare a letter to either of the NSF Officers, as shown on the “Grant Award”, specifying the nature of the request, its relation to the purpose of the grant, the amounts involved, and the budget categories affected. The letter should be forwarded to the UCSD Office of Contract and Grant Administration for countersignature and submission to the agency. When approval is received, the PI should prepare and submit a *Budget Adjustment Journal* and a copy of the NSF approval letter in accordance with PPM 380-4. The *Budget Adjustment Journal* should be forwarded directly to the Manager, Extramural Funds Accounting.

**V. JUSTIFICATION**

The Principal Investigator is responsible for providing a brief but comprehensive explanation/justification describing the scientific, technical or administrative reason(s) for all requests. As a minimum, the justification must address the following:

- A. A brief description of the proposed action;
- B. Scientific, technical or administrative justification for the action. (Include a statement as to the scientific benefit which will accrue to the project as a result of the request);
- C. Explanation for rebudgeting from any category, why the funds are available (specify budget categories, if applicable) and how the lack of funds in this category impacts the continuous operation of the project as outlined in the original proposal.
- D. For requests for travel or the purchase of equipment, the following specific areas must be addressed:
  1. Travel
    - a. Itemization of cost i.e., airfare, per diem, registration fee, etc.;
    - b. Purpose, date, and place of travel;
    - c. Relationship to research;
    - d. Relationship of the traveler(s) to the research project;
    - e. A statement of compliance with Federal regulations regarding the use of U.S. Flag Air Carriers (foreign travel only); and
    - f. A copy of the travel itinerary or meeting invitation (foreign travel only).
  2. Equipment
    - a. Description of equipment - if more than one item requested, itemize the description and cost of each;

**University of California San Diego Policy – PPM 150 - 61**  
**PPM 150 – 61 Organizational Prior Approval System Requirements for National Science Foundation (NSF) Research Grants**

- b. Justification for the request;
- c. How the proposed purchase impacts the operation of the project as outlined in the original proposal; and
- d. Requests for purchase of equipment over \$1000 must include a completed copy of the [Equipment Screening Certificate](#).

It is of utmost importance that special attention be given to the above required justification(s) as it is the most critical element of the prior approval request.

**VI. RESPONSIBILITIES**

**A. MSO**

Receives request from PI, reviews for administrative purposes, initials and forwards to Department Chair.

**B. Department Chair**

- 1. Reviews and approves/disapproves the request for scientific propriety, project relevance and effective utilization of institutional resources.
- 2. Forwards the approved package to the Contract and Grant Officer, OCGA.

**C. Contract and Grant Officer, OCGA**

Upon receipt by OCGA, the Contract and Grant Officer will review the request for consistency with University and NSF policy. When fully approved, the original copy of the request is forwarded to the Manager, Extramural Funds Accounting, a copy is retained by OCGA and the additional copies forwarded to the Principal Investigator, Departmental MSO and Purchasing Division, as applicable. If any questions arise during the review, the OCGA will consult with the appropriate departmental personnel. Should the request be disapproved, an explanation will be forwarded to the Principal Investigator for informational purposes or for further action.

**D. Manager, Accounting Office/Extramural Funds Division**

The Manager reviews the *Budget Adjustment Journal* for conformance with University and NSF financial regulations and returns a copy to the departmental business office. Should additional information be required, appropriate departmental administrators will be contacted.

**VII. ORGANIZATIONAL PRIOR APPROVAL SYSTEM REQUIREMENTS UNDER NSF RESEARCH**

CLASSIFICATION		AUTHORITY
1.	Alterations and Renovations A. Expenditures less than \$10,000 B. Expenditures over \$10,000 which are considered construction, as opposed to alterations and renovations	UCSD Contract & Grant Officer NSF via OCGA for endorsement
2.	Capital Expenditures for land or Buildings	NSF via OCGA for endorsement

**University of California San Diego Policy – PPM 150 - 61**  
**PPM 150 – 61 Organizational Prior Approval System Requirements for National Science**  
**Foundation (NSF) Research Grants**

3.	Changes in Objectives or Scope	NSF via OCGA for endorsement
4.	Changes of Principle Investigator or level of Principle Investigator Effort A change of Principle Investigator (PI) is defined as an anticipated absence for more than 3 months during and continuous period without the active direction of an approved PI. The request must be submitted at least thirty (30) days before the departure of the approved PI. A change in the level of effort is defined as a substantial increase or decrease in the PI's effort which affects the project/proposal as approved or the successful progress/completion of the project.	NSF via OCGA for endorsement
5.	Consultants The daily consultant rate paid to an individual not employed by the University may not exceed the maximum rate paid to a GS-18 Federal employee.  (NOTE: University Academic personnel who desire to act as professional consultants in connection with research projects under the auspices of the University should contact the Academic Personnel Office to determine allowability in accordance with University policy, conflict of interest and other related policies.)	UCSD Contract & Grants Officer
6.	Contractual Third Party Costs This classification includes subcontracts and consortium agreements.	UCSD Contract & Grant Officer
7.	Equipment Equipment (including sales tax)-is defined as tangible nonexpendable property with a unit cost of \$500 or more and a useful life of two years or more. A. General Purpose - General Purpose Equipment is not used primarily or for endorsement exclusively for scientific purposes. B. General Purpose used as Special Purpose - General Purpose Equipment is used primarily or exclusively for scientific purposes. C. Special Purpose  1) Under \$1,000 per item 2) Over \$1,000 per item (each item over \$1,000 requires screening)	NSF via OCGA for endorsement UCSD Contract & Grant Officer Principal Investigator UCSD Contract & Grant Officer
8.	No-Cost Extensions One time only for up to six (6) months beyond flexibility period. The justification for the request will include a brief summary of progress to date, funds remaining and their future use and plans for completion of project for which extension is requested. The fact that funds remain upon expiration is not in itself sufficient justification for an extension. The request with justification must be submitted no later than 30 days prior to the grant period expiration date.	UCSD Contract & Grant Officer with written notification to the NSF Grant Officer
9.	Personnel Costs	Principle Investigator
10.	Pre-Award Costs Up to 90 days prior to the effective date of award. Form FO2141, <i>Request for Advance Approval to Establish Accounts &amp; Incur Expenses</i> , is required for this action and must be approved prior to incurrence of the cost.	UCSD Contract & Grant Officer
11.	Related Projects A. Provided no significant change is made in the objectives or scope of an individual NSF grant, allowable grant costs may be committed or otherwise expended between two or more active NSF grants held by the same Principal Investigator during the grant periods. Sufficient documentation	UCSD Contract & Grant Officer

**University of California San Diego Policy – PPM 150 - 61**  
**PPM 150 – 61 Organizational Prior Approval System Requirements for National Science**  
**Foundation (NSF) Research Grants**

	<p>shall accompany the Principal Investigator's request to enable OPAS to determine that the projects have a scientific or technical commonality.</p> <p>B. Other Uses of Relatedness (e.g, collaboration of two Principal Investigators with separate projects)</p>	<p>NSF via OCGA for endorsement</p>
12.	<p>Retroactive Approval</p> <p>NSF allows retroactive approval only under "unusual circumstances" and requires substantially more justification. Specifically, such approvals require a detailed explanation as to why prior approval was not obtained on a timely basis.</p>	<p>NSF via OCGA for endorsement</p>
13.	<p>Travel</p> <p>Must be directly related to and show promise of enhancing the capability of carrying out the sponsored research objectives.</p> <p>A. Domestic</p> <p>1) Cumulative expenditures less than \$500 or 25% over the amount budgeted, whichever is greater</p> <p>2) Cumulative expenditures which exceed \$500 or 25% over the amount budgeted, whichever is greater.</p> <p>B. Foreign</p> <p>Foreign travel is defined as any travel outside the U.S. (50 states) and Canada.</p> <p>1) Each trip (exclusive of solicited travel approved by award)</p> <p>2) Dependent Travel, when</p> <p>a) Individual scientist is a key person who is essential to the research on a full-time basis.</p> <p>b) Individual scientist's residence is away from home and in a foreign country for a continuous period of six months or more and is essential for the effective performance of the project.</p>	<p>Principal Investigator</p> <p>UCSD Contract &amp; Grant Officer</p> <p>UCSD Contract &amp; Grant Officer</p> <p>UCSD Contract &amp; Grant Officer</p>