



HRSA
Healthy
Grants
WORKSHOP
Presented as a Web Series

HRSA
Health Resources & Services Administration

Best Practices for Prior Approvals

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Vision: Healthy Communities, Healthy People



Agenda

- **What is a Prior Approval Request?**
- **Types of Prior Approval Requests**
- **Expanded Authority**
- **How to Submit Requests**
- **Resources**
- **Questions?**



What is a Prior Approval Request?



HRSA approval may be required when a recipient needs to change certain aspects of the approved application after the award is issued



Require submission in Electronic Handbooks (EHBs) Prior Approval (PA) Module



Require a 30-day response from HRSA



Recipients may not move forward until HRSA approval is received, either via Notice of Award (NoA) or an EHB email notification

Regulations and Resources

- **45 CFR §75.308** – “Revision of budget and program plans” lists all the program or budget-related plan revisions that require prior approval from HHS
- Check the program legislation, Notice of Funding Opportunity (NOFO), and Notice of Award (NoA) for specifics on what changes require prior approval



Types of Prior Approval Requests

- **Change in Key Personnel (Project Director Change)**
- **Rebudgeting (e.g. Alteration & Renovation, Transfers, etc.)**
- **Change in Scope**
- **Carryover Unobligated Balance**
- **Extension without Funds (No Cost Extension)**
- **Property Actions (e.g. Disposition, Encumbrance)**
- **Organizational Name Change (Other)**
- **Change of Recipient**
- **Approval to Draw-down funds**



Types of Prior Approval Requests 2

- Relinquishment
- Capital Update
- Extension with Funds
- Administrative Supplements
- Other

**PRIOR
APPROVAL
REQUIRED**

Change in Key Personnel

- **Key personnel are those who contribute or execute the project in a meaningful way. Their absence from the project would impact the approved scope of the project.**
- **The program legislation, Notice of Funding Opportunity (NOFO), and Notice of Award (NoA) will indicate which positions are affected.**
- **Defined in 45 CFR Part 75: The individual(s) designated by the recipient to direct the project or program being supported by the grant. The PI/PD is responsible and accountable to officials of the recipient organization for the proper conduct of the project, program, or activity.**



Change in Key Personnel

- **Changes include situations in which the current Project Director/CEO withdraws from the project entirely; is absent during any continuous period of three months or more; or reduces the time they devote to the project by 25% or more from the level that was approved at the time of award. [see : 45 CFR 75.308(c)(1)(ii) and (iii)].**



Change in Key Personnel (continued)

Include the following in your Prior Approval Request via the EHBs:

- Request Prior Approval as soon as possible
- Effective date of the change
- Justification for the change
- Qualifications of the proposed replacement PI/PD
- Curriculum vitae of the proposed replacement PI/PD
- Level of effort this individual will undertake
- Budgetary changes resulting from the proposed change



Expanded Authorities

- **Waive certain prior approval requirements for some actions**
- **Notice of Award (NoA) will tell you if your program has expanded authorities and which requirements have been waived**
 - **Remarks**
 - **Terms and Conditions**



Rebudgeting

- **Significant re-budgeting occurs when, under a grant with a federal share exceeding \$100,000, cumulative transfers among direct cost budget categories for the current budget period exceed 25% of the total approved budget—including direct and indirect costs, whether chargeable to federal funds or required matching or cost sharing—for that budget period or \$250,000, whichever is less.**
- **Category re-budgeting**
- **Purchase of real/tangible property, including equipment**



Rebudgeting 2

Unless otherwise restricted by the terms of your NoA, you may make post-award programmatic and budget revisions within and between approved budget categories up to 25% without prior approval.



Rebudgeting 3

Include the following in your Prior Approval Request via the EHBs:

- **Cover letter providing an explanation regarding the need for the budget revision and detailed costs**
- **Revised SF-424A or 424 R&R, and possibly the 424C**
- **Line-item budget**
- **Narrative justification**



Carryover of Unobligated Balance

- Request to use unobligated balance in a subsequent budget period
- Should be submitted within 30 days of the submission of the Federal Financial Report
- A Carryover cannot be used for new activity that was not proposed in the original budget.



Carryover of Unobligated Balance - Submission

Include the following in your Prior Approval Request via the EHBs:

- **Cover Letter which includes:**
 - The amount being carried over and brief explanation on why there is a remaining balance
 - The allowable activities and proposed timeline that the carryover, if approved, will be used for
 - Statement indicating there will be no changes to the approved award objectives, goals or purposes
- **Revised SF-424A: Budget Form**
- **Line-Item Budget Breakdown & Justification**



Carryover or Extension Without Funds?

- How do I know which one to request?
- Is there a subsequent budget period?
 - If yes, request a carryover
 - If no, request a no-cost extension
- **Ask your Grants Management Specialist if you are not sure!**



Extension Without Funds (No-cost extension)

- Request for more time to complete a project, not to exceed 12 months, submission recommended at least 60 days prior to the expiration of the project period.
- Not merely for the purpose of using an unobligated balance (45 CFR 75.308d(2))

Extension Without Funds (No-cost extension) continued

Include the following in your Prior Approval Request via the EHBs:

- A statement about why you need the extension
- The duration of the extension (not to exceed 12 months)
- Project objectives you plan to complete during the extension period
- A detailed budget page
- A budget justification for unobligated funds you anticipate will remain at the end of the current budget period



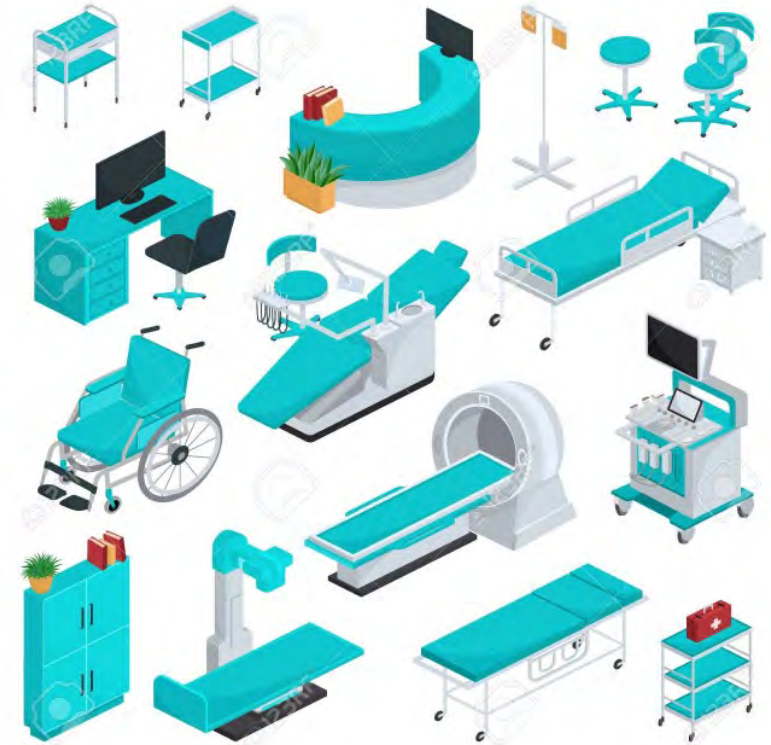
Change in Scope

Any major change to the originally-approved scope of work



Property Disposition

- Approval to transfer or sell equipment or transfer, sell, or mortgage real property
- See 45 CFR Parts 75.318-75.321



Approval to Draw-down Funds

- **Specific award conditions may include, but are not limited to, the following, requiring payments as reimbursements rather than advance payments**
- **When a Federal award recipient is placed on restricted drawdown, all drawdowns of Federal funds from the Payment Management System (PMS) must have approval of HRSA's Office of Federal Assistance Management, Division of Grants Management Operations, and must comply with all applicable requirements before funds are drawn.**



Organizational Name Change

- Submit under Other, then Name Change
- Make sure you update in SAM.gov too!



Change in Recipient

- **Successor-in-Interest:** Two organizations merge, or one organization takes over another by assuming all assets and liabilities



Relinquishment

- Recipient decides it is unable or unwilling to carry out the approved project and has chosen to give up the award
- Full award or part of an award



RETURN TO
SENDER

How to Submit a Prior Approval Request in EHB

- In HRSA's Electronic Handbooks (EHBs)
- Create New Prior Approval
- Request Type: Carryover, Project Director Change, Rebudgeting, Other etc.
- [Prior Approval Request FAQs](#)



Steps to Create a Prior Approval Request in EHB

- Login to the EHBs (<https://grants.hrsa.gov/webexternal>) as a Grantee using [Login.gov](https://login.gov) and two-factor authentication.
- For details about logging in to the EHBs, refer to the [EHBs Login Process Overview](#) help page.

The screenshot displays the HRSA Applicant/Grantee portal. At the top, it says "Applicant/Grantee". Below this is the "LOGIN.GOV" section, which includes a message: "The EHBs uses Login.gov and two-factor authentication to enhance security. Use your existing Login.gov account, with the same email used for the EHBs, or create a new Login.gov account." There are two buttons: "Create Login.gov Account" and "Login".

To the right of the Login.gov section is a "What's New" section with a "View all" link. It contains two messages:

- What's New Go Live Grantee Message** (dated 01/28/2022): **What's New Message : New Prior Approval (PA) and Other Submissions (EDM) Budget Forms**. The message text is "The EHBs has ... (Read More)".
- What's New Go Live Grantee Message** (dated 10/29/2021): **What's New Message : Transition to Unique Entity Identifier (UEI) – October 2021 updates**. The message text is "HRSA's Electronic Handbooks (EHBs) has been further updated t... (Read More)".

Below the Login.gov section are three columns of links:

- Learning**: Grant Program, Free Clinic Program, FQHC-LAL Program.
- Other Links**: Browser Requirements, Funding Opportunities, Track Grant Application, Help, Other EHBs Portals.
- Contact Us**: Contact (EHBs Customer Support, 877-464-4772, 7:00 a.m. to 8:00 p.m. (ET), Monday through Friday, Closed All Federal Holidays), Email Support, HRSA Help Center.

Steps to Create a Prior Approval Request in EHB



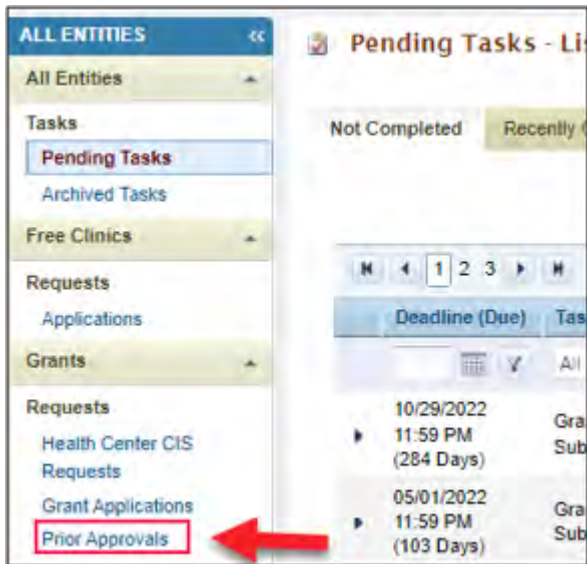
The screenshot shows the HRSA Electronic Handbooks user interface. At the top, there is a navigation bar with the HRSA logo and the text 'Electronic Handbooks'. Below this is a search bar and a set of tabs: Home, Tasks, Organization, Grants, Free Clinics, FQHC-LALs, Dashboards, and Resource. The 'Tasks' tab is highlighted with a red arrow. Below the navigation bar, the user is greeted with 'Welcome, Ananth Capriola'. The main content area is divided into two sections: 'My Tasks' on the left and 'Tracking' on the right. The 'My Tasks' section shows a green box with the number '45' and the text 'All'. The 'Tracking' section contains a table with the following data:

Category	Submitted Tasks ↗	Submitted
<input checked="" type="checkbox"/> Other Submissions	EDM SF424 R&R Submission Name - EDM...	01/14/2022
<input checked="" type="checkbox"/> Prior Approval	Administrative Supplements	01/11/2022

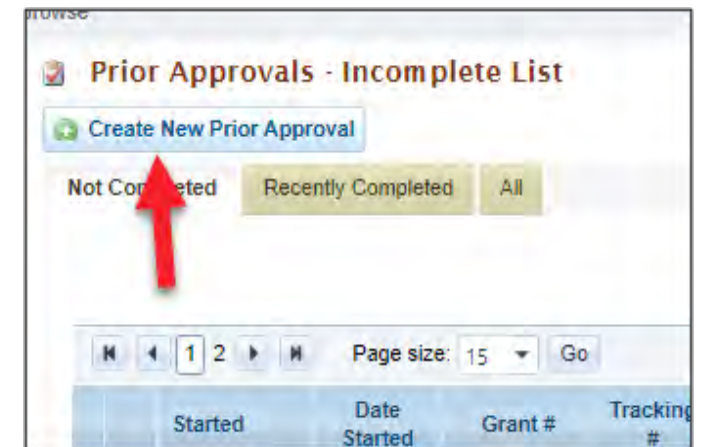
Select the **Tasks** tab from the top header options.

Steps to Create a Prior Approval Request in EHB 2

On the **Pending Tasks - List** page, select **Prior Approvals** from the Grants section in the left navigation panel. You will land on the Prior Approvals - Incomplete List page.



Select the **Create New Prior Approval** button, just below the page title. You will land on the **My Grant Portfolio- List** page



Steps to Create a Prior Approval Request in EHB 3

Select **Request Prior Approval** in the **Options** column. You will land on the **Prior Approval Request - Acknowledge Documentation Review** page.

3 items in 1 page(s)

Current Budget Period	Current Project Period End Date	CRS-EIN	Grant Role	Grant Active	Last Award Issue Date	Options
	<input type="text" value="01/31/2023"/>	<input type="text" value="1145563766A1"/>	All <input type="text" value=""/>	All <input type="text" value=""/>	<input type="text" value="05/25/2021"/>	Request Prior Approval ▼
02/01/2021-01/31/2022	01/31/2023	1145563766A1	Other, FRA	Yes	05/25/2021	Request Prior Approval ▼
08/01/2021-07/31/2022	07/31/2022	1145563766A1	Other, FRA	Yes	12/14/2021	Request Prior Approval ▼
01/01/2021-12/31/2021	12/31/2021	1145563766A1	Other, FRA	No	05/11/2021	Request Prior Approval ▼

3 items in 1 page(s)

Steps to Create a Prior Approval Request in EHB 4

Prior Approval Documentation	
Document Name	Description
HHS Grant Policy	HHS Grant Policy

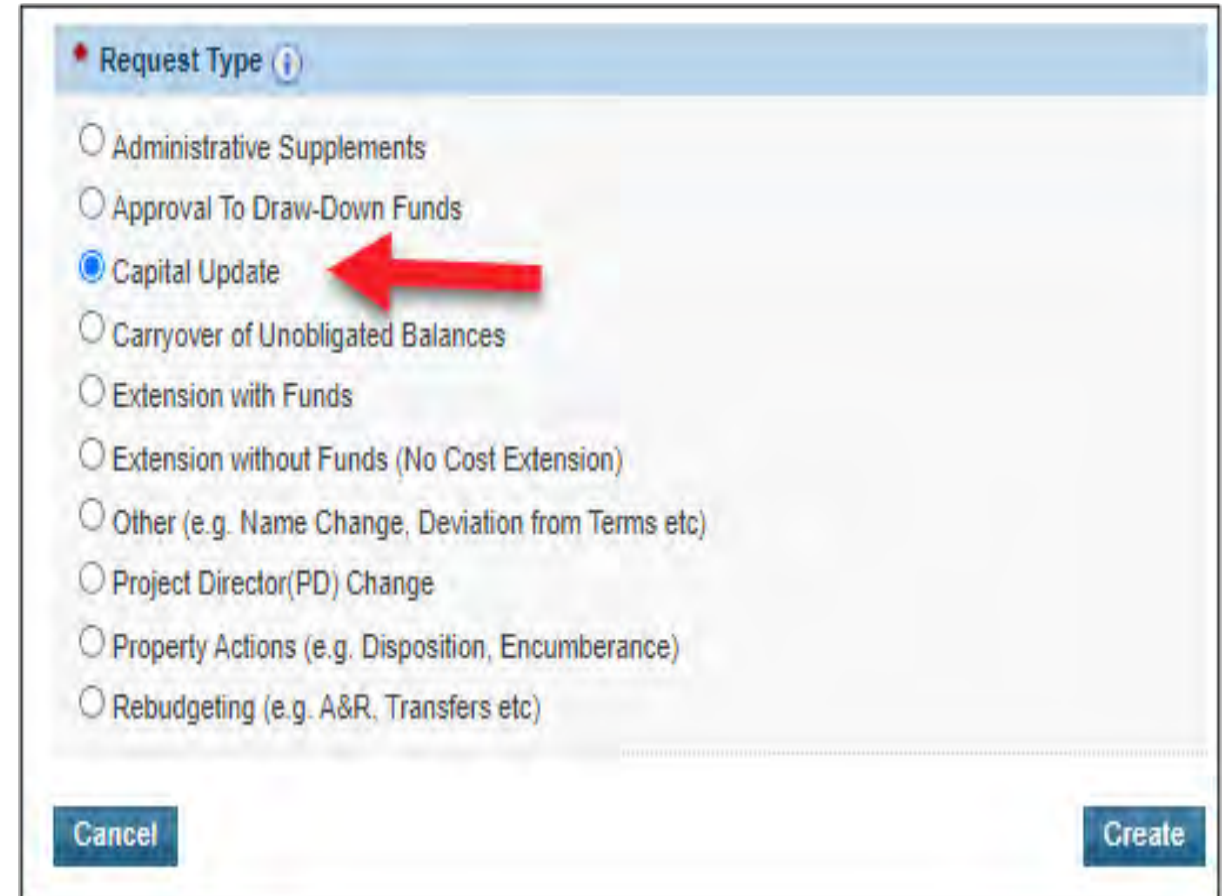
Open and review the document(s) under the **Prior Approval Documentation** section.

* Acknowledgement	
<input type="checkbox"/> I acknowledge that I have reviewed all documentation and would like to proceed further.	
UNIFORM GUIDANCE CODIFIED FOR HHS AT 45 CFR PART 75	
<input type="checkbox"/> I acknowledge that I have reviewed the UNIFORM GUIDANCE CODIFIED FOR HHS AT 45 CFR PART 75 and would like to proceed further.	
<input type="button" value="Cancel"/>	<input type="button" value="Continue"/>

Select the **Acknowledgment** check boxes and then select the **Continue** button. You will land on the **Prior Approval Request Type - Select** page.

Steps to Create a Prior Approval Request in EHB 5

Select the radio button for the **Request Type** and then select the **Create** button. You will land on the **Prior Approval - Status Overview** page displaying a "Success" banner.



The screenshot shows a form titled "Request Type" with a list of radio button options. The "Capital Update" option is selected, indicated by a blue dot and a red arrow pointing to it. The other options are unselected. At the bottom of the form, there are two buttons: "Cancel" on the left and "Create" on the right.

- Administrative Supplements
- Approval To Draw-Down Funds
- Capital Update
- Carryover of Unobligated Balances
- Extension with Funds
- Extension without Funds (No Cost Extension)
- Other (e.g. Name Change, Deviation from Terms etc)
- Project Director(PD) Change
- Property Actions (e.g. Disposition, Encumbrance)
- Rebudgeting (e.g. A&R, Transfers etc)

Steps to Create a Prior Approval Request in EHB 6

On the **Prior Approval Request – Status Overview** page, select the forms from the left menu and enter the details in the structured budget forms. The displayed budget forms are based on the Prior Approval Type and Grant Type combination selected.

Prior Approval Request - Status Overview

Success:
You have successfully created a Prior Approval Request. The Request Tracking Number is PA-00100078. Please use this number for all future correspondence related to this request.

PA-00100078 : BEALLS POULENC HEALTH CENTER, BANCROFT, NV Submission Status: In Progress

Prior Approval Request Type: Capital Update Grant Number: H80CS00589 Project Period: 02/01/2019 - 01/31/2023
Budget Period: 02/01/2021 - 01/31/2022 Project Title: Health Center Program

Resources

View
Last NoA | HRSA Contacts | Awarded Funding Opportunities

Users with permission on Prior Approval Request (8)

Prior Approval Status		
Section	Status	Options
General Information	Not Started	Update
Details	Not Started	Update
SF424 A - Section A-C	Not Started	Update
SF424 A - Section D-F	Not Started	Update
SF424 A - Budget Narrative	Not Started	Update
SF424 C - Budget Narrative	Complete	Update
SF424 C - Budget Information	Complete	Update

Steps to Create a Prior Approval Request in EHB 7

Note:

You can use the left navigation menu to add budget information to each structured form. OR you can select Update within the **Prior Approval Status** section.

ALL TASKS <<

Prior Approval Functions

Overview

Status

Request Information

- General Information
- Request Details

SF-424 A

- Section A-C
- Section D-F
- Budget Narrative

SF-424 C

- Budget Information
- Budget Narrative

Review and Submit

- Submit
- Review

Other Functions

Navigation

- Return to Prior Approvals List

Prior Approval Request - Status Overview

Success:
You have successfully created a Prior Approval Request. The Request Tracking Number is PA-00100078. Please use this number for all future correspondence related to this request.

PA-00100078 : BEALLS POULENC HEALTH CENTER, BANCROFT, NV Submission Status: In Progress

Prior Approval Request Type: Capital Update Grant Number: H80CS00589 Project Period: 02/01/2019 - 01/31/2023
Budget Period: 02/01/2021 - 01/31/2022 Project Title: Health Center Program

Resources

View

Last NoA | HRSA Contacts | Awarded Funding Opportunities

Users with permission on Prior Approval Request (8)

Section	Status	Options
General Information	Not Started	Update
Details	Not Started	Update
SF424 A - Section A-C	Not Started	Update
SF424 A - Section D-F	Not Started	Update
SF424 A - Budget Narrative	Not Started	Update
SF424 C - Budget Narrative	Complete	Update
SF424 C - Budget Information	Complete	Update



Steps to Create a Prior Approval Request in EHB 8

Note: Depending on the Prior Approval request selected, the details requested within the structured budget forms will change.

Prior Approval - General Information

▶ PA-00084994 : MANAGERS PRESSOTECHNIK UNIVERSITY, BLUE RIDGE, LA Submission Status: In Progress

▼ Resources

View

Last NoA | HRSA Contacts | Awarded Funding Opportunities

Fields with * are required

*** Sub Type**

Name/Entity Change
(To transfer the legal and administrative responsibility of a grant-supported project or program from one legal entity to another, before the expiration of the approved project)
For Example: Organization Name Change, EIN Change

Request for change in Terms and Conditions
(To undertake any activities disapproved or restricted as a condition of the award)

Initiate Relinquishment of Grant
(To request termination of grant award prior to its scheduled end date)

Other
(For any other type of Prior Approval Request)

Contact Information

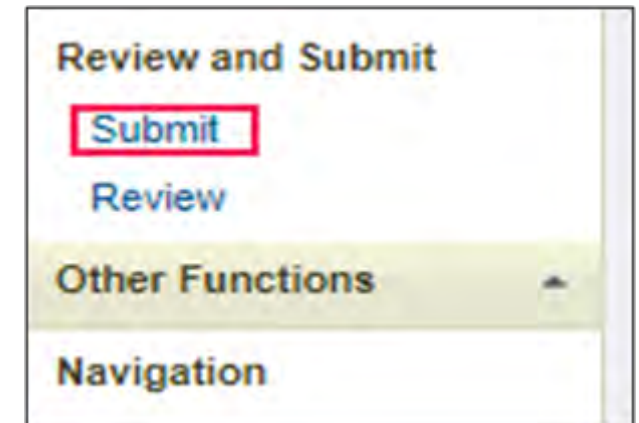
Role	Title	Name	Phone	Email	Options
* Point of Contact					Add
* Authorizing Official					Add

[Go to Previous Page](#) [Save](#) [Save and Continue](#)



Steps to Create a Prior Approval Request in EHB 9

After completing the Prior Approval Request select **Submit** within left navigation menu. Complete the details provided and **Submit** the Prior Approval Request.



Best Practices

- **Timely submissions**
- **Submit correct information**
- **Refer to 45 CFR 75 for any policy questions**
- **Communication with GMS/PO**



EHB Resources

[Knowledge Base](#)

[Interactive Videos](#)

- [How Do I Reset a Forgotten EHBs Password](#)
- [Managing Users in the EHBs](#)
- [EHBs User Permissions Overview](#)

[Help Topics and FAQs](#)

[Prior Approval Requests FAQs](#)

EHB Contact Center:

- HRSAEHTier2Support@hrsa.gov
- (301) 443-2112



Policy Resources

- Uniform Administrative Requirements, Cost Principles, and Audit Requirements: [45 CFR Part 75 \(HHS awards\)](#)
- [HHS Grants Policy Statement](#)



HRSA Resources

- Notice of Funding Opportunity (NOFO)
- Notice of Award (NoA)
- [HRSA Manage Your Grant](#)
- [HRSA Healthy Grants Workshops](#)
- [Technical Assistance Conference Calls](#)



HRSA Tube Videos

- [How to Request a Prior Approval](#)
- [How to Request a Carryover](#)
- [How to Change a Project Director](#)
- [Many more!!!](#)



Questions?



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