**OHIC Grant Management Clarification**

**Budget Revisions**

**Overview**

Occasionally grantees need to conduct budget revisions mid-grant period. Sometimes these requests will need to be submitted formally through the GrantSolutions Amendment process to ACL. In other occasions ACL/OHIC requests that grantees submit the request via GrantSolutions Grant Note to officially document the change in the grant file. Below you will find an overview of the different situations and the required steps for the grantee submission.

**Grant Policy References**

For the relevant prior approval revision policies refer to the HHS Grants Policy Statement (<https://www.hhs.gov/sites/default/files/grants/grants/policies-regulations/hhsgps107.pdf>) pages II-48 to II-57. Below are the pieces of policy relevant to budget revisions specifically:

 **Change in Scope** (page II-53): A change in scope occurs when the recipient proposes to change (or changes) the objectives, aims, or purposes identified in the approved application, such as shifting the research emphasis from one disease area to another, changing the service area, applying a new technology, changing the approved design under a construction grant, eliminating a primary care delivery site, or making budget changes that cause a project to change substantially from that which was approved.

In addition to explicit changes in the objectives, aims, or purposes identified in the approved grant application, post-award changes that are clear indicators of a change in scope or that are likely to be considered a change in scope include, but are not limited to, the following:

• **Transfer of the performance of substantive programmatic** work to a third party through a subaward, contract, or any other means, if the authority for such activities is not included in the approved application. If the third party is a foreign component, this type of action always requires OPDIV prior approval.

• **Significant rebudgeting**, whether or not the particular expenditures require prior approval. Significant rebudgeting 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 percent of the total approved budget (which includes 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.

**Required Prior Approval Requests**

Per the policy reference above, grantees will need to submit prior approval requests (via Amendments in GrantSolutions) any time they are making budget revisions that include 1) a change in scope or 2) changes to their subawards or subcontracts that are not covered in their original budget/application.

Process:

1. Grantees must submit the prior approval request as an Amendment via GrantSolutions.
	1. Instructions can be found here: <https://acl.gov/grants/managing-grant>
2. The OHIC Project Officer will then review the request to determine program approval of the request and document appropriately.
3. ACL Grant Specialist (GS) must review and process the grantee request. If there are any issues with the request the GS may return the amendment to the grantee for revision and resubmission.

**Managing Requests That Do Not Officially Require Prior Approval**

OHIC would like any changes that impact the provision of the services being provided or the administration of the award to be documented in GrantSolutions. If the changes do not meet the threshold for a required Prior Approval process outlined above, the grantee should not submit a grant Amendment in GrantSolutions but should instead provide a written overview of the change via a Grant Note in GrantSolutions.

Process:

1. The grantee should submit a Grant Note to the grant file in GrantSolutions which includes the reason for the change, an overview of what is changing (including programmatic and financial details), and the expected result of the change (if applicable).
2. The OHIC Project Officer will review the Grant Note, discuss any questions or concerns with the grantee, and provide a corresponding Internal Grant Note (only viewable by ACL) to the grant file in GrantSolutions providing concurrence with the change. The OHIC Project Officer will also notify the grantee of the concurrence of the change via email.
3. If there are concerns with the proposal, the Project Officer will work with the grantee to address those concerns and document the additional adjustments to the request via Grant Notes.