

California State University, Dominguez Hills Foundation

Post Award Management Services

Prior Approval Policy

BACKGROUND POLICY STATEMENT

Under any given Federal award, the reasonableness and allocability of certain items of costs may be difficult to determine. In order to avoid subsequent disallowance or dispute based on unreasonableness or nonallocability, the CSUDH Foundation entity may seek the prior written approval of the cognizant agency for indirect costs or the Federal awarding agency in advance of the incurrence of special or unusual costs.

Prior written approval should include the timeframe or scope of the agreement.

The absence of prior written approval on any element of cost will not, in itself, affect the reasonableness or allocability of that element, unless prior approval is specifically required for allowability as described under 2 CFR §200.407.

REQUIRED PRIOR APPROVAL OF CERTAIN COSTS

In accordance with 2 CFR §200.407, the following items shall require prior approval of the Federal awarding agency in advance of any action(s) by the CSUDH Foundation (or its Project Directors, designees, or staff):

- Use of grant agreements (including fixed amount awards), cooperative agreements, and contracts (§ 200.201, paragraph (b)(5));
- Cost sharing or matching (§ 200.306);
- Program income (§ 200.307);
- Revision of budget and program plans (§ 200.308);
- Real property (§ 200.311);
- Equipment (§ 200.313);
- Fixed amount subawards (§ 200.332);
- Direct costs (§ 200.413, paragraph (c));
- Compensation—personal services (§ 200.430, paragraph (h));
- Compensation—fringe benefits (§ 200.431);
- Entertainment costs (§ 200.438);
- Equipment and other capital expenditures (§ 200.439);
- Exchange rates (§ 200.440);
- Fines, penalties, damages and other settlements (§ 200.441);
- Fund raising and investment management costs (§ 200.442);
- Goods or services for personal use (§ 200.445);
- Insurance and indemnification (§ 200.447);
- Memberships, subscriptions, and professional activity costs (§ 200.454, paragraph (c));
- Organization costs (§ 200.455);

- Participant support costs (§ 200.456);
- Pre-award costs (§ 200.458);
- Rearrangement and reconversion costs (§ 200.462);
- Selling and marketing costs (§ 200.467);
- Taxes (including Value Added Tax) (§ 200.470); and
- Travel costs (§ 200.474).

SEEKING PRIOR APPROVAL

If prior approval has previously been authorized, either in the awarding phase of the sponsored program or otherwise, documentation should be provided to the Post Award Management Office. This documentation shall be verified in cases of items requiring prior approval. Should prior approval not be on file, the Post Award Management Office shall coordinate with the Project Director and the Office of Research and Sponsored Programs' Director (who is the Authorization Organizational Representative, or AOR) in order to obtain prior approval. Under no circumstances shall any action(s) be taken under the above section in which prior approval has not been expressly provided.

MAINTAINING DOCUMENTATION

All documentation related to prior approval requests and decisions shall be maintained in the files of the sponsored program in the Post Award Management Office, subject to the CSU Document Retention Policy.