

**Federal Prior Approval and Other Requirements Matrix\* -- Updated July 28, 2015**

- 1) For use on UW-Madison awards subject to the Uniform Guidance until new Research Terms and Conditions are available.  
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 4) All information is subject to change as agency implementations and policies are released.

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|  | Uniform Guidance Citation(s)            | Uniform Guidance determination | EPA                                  | NIH  | NSF  | ONR | NASA | DOE (Energy) | DOC | Comments   |
|--|---|--------------------------------|--------------------------------------|------|------|-----|------|--------------|-----|--|
| <b>General Requirements</b>  |   |                                |                                      |      |      |     |      |              |     |  |
| Change in Scope  | 200.308(c)(1) & 200.308(g)(1)           | R                              | R                                    | R    | R    | R   | R    | R            | R   |  |
| Disengagement or Change of PI  | 200.308(c)(2) & 200.201(b)(5)           | R                              | R                                    | R    | R    | R   | R    | R            | R   | Disengagement of more than 3 months or 25% or greater reduction in level of committed effort |
| Change in key persons specified in the award   | 200.308(c)(2)                           | R                              | R                                    | R    | R    | R   | R    | R            | R   |  |
| Change in key persons specified in the application   | 200.308(c)(2)                           | R                              | R                                    | W    | R    | R   | R    | R            | R   |  |
| Need for Additional Funding  | 200.308(c)(8) & 200.308(g)(2)           | R                              | R                                    | R    | R    | R   | R    | R            | R   |  |
| New subawards not already approved in awarded budget   | 200.308(c)(6)                           | R                              | Required per State of WI regulations |      |      |     |      |              |     |  |
| Transferring of scope of work  | 200.308(c)(6)                           | R                              | R                                    | R    | R    | R   | R    | R            | R   |  |
| Issuing fixed amount subawards up to Simplified Acquisition Threshold  | 200.308(c)(6) & 200.332                 | R                              | R                                    | W    | R    | R   | R    | R            | R   |  |
| Pre-award costs (90 days)  | 200.308(d)(1), 200.308(d)(4), & 200.458 | W                              | W                                    | W    | W    | W   | W    | W            | R   |  |
| Pre-award costs (more than 90 days)  | 200.308(d)(1)                           | R                              | R                                    | R    | R    | R   | R    | R            | R   |  |
| Initial no-cost extension of up to 12 months (per competitive segment)   | 200.308(d)(2) & 200.308(d)(4)           | W                              | W                                    | W    | W    | R   | W    | W            | R   |  |
| Subsequent no-cost extension or extension of more than 12 months   | 200.308(d)(2) & 200.77                  | R                              | R                                    | R    | R    | R   | R    | R            | R   |  |
| Carry-forward of unexpended balances to subsequent periods of performance  | 200.308(d)(3) & 200.308(d)(4)           | W                              | W                                    | W    | W    | W   | W    | W            | W   |  |
| <b>Cost-related Requirements</b>   |   |                                |                                      |      |      |     |      |              |     |  |
| Rebudgeting among budget categories  | 200.308(e)                              | May be required                | UG                                   | W    | W    | UG  | UG   | UG           | R   | Follow agency terms & conditions   |
| Rebudgeting between direct and F&A costs   | 200.308(e)                              | May be required                | UG                                   | W    | W    | UG  | UG   | W            | R   | Follow agency terms & conditions   |
| Rebudgeting of funds allotted for training allowances (direct payment to trainees) and participant support costs to other categories of expense. | 200.308(c)(5) & 200.456                 | R                              | R                                    | R    | R    | R   | R    | R            | R   |  |
| Special Purpose Equipment not in approved budget   | 200.439(b)(2)                           | R                              | UG                                   | W    | UG   | UG  | R    | UG           | R   |  |
| Direct charging of salaries of administrative or clerical staff  | 200.413(c)                              | R                              | UG                                   | W*** | R    | UG  | UG   | UG           | R   |  |
| Rearrangement and reconversion (Alteration & renovation) costs   | 200.462                                 | R                              | UG                                   | R    | W*** | UG  | UG   | UG           | R   |  |
| Foreign Travel   |   | Silent                         | R                                    | W    | W    | R   | R    | R            | R   |  |
| Faculty internal consulting compensation that exceeds base salary  | 200.430(h)                              | R**                            | R                                    | W*** | R    | R   | R    | R            | R   |  |
| Restrictions on costs not explicitly unallowable under Cost Principles   | 200.407                                 |                                | If unclear, contact agency           |      |      |     |      |              |     |  |

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W - Prior approval requirement waived.

UG - In the absence of specific guidance from the agency, the Uniform Guidance applies.

\*\* Also see guidance in UW-Madison Effort Reporting Guidelines on institutional base salary (<https://www.rsp.wisc.edu/effort/ectraining/GuidelinesForEffortReporting.pdf>), policy on overloads (<http://www.ohr.wisc.edu/polproced/UPPP/1101.htm>), and guidance on outside consulting (<https://kb.wisc.edu/gsdadminkb/page.php?id=34636>).

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| <b>Cost-related Requirements (cont.)</b>   |                           |                                |  |     |      |     |      |              |     |                                  |
| Inclusion of unrecovered F&A costs as cost sharing   | 200.306(c)                | R                              | UG   | UG  | R    | UG  | UG   | W            | R   |                                  |
| Changes to approved cost sharing or matching   | 200.308(c)(7)             | R                              | UG   | UG  | R    | UG  | UG   | R            | R   |                                  |
| Transfer of funds between construction and non-construction  | 200.308(g)(5)             | May be required                | R  | R   | W*** | UG  | UG   | UG           | UG  |                                  |
| Use of program income earned during the project period   | 200.307(e)                | W                              | W  | UG  | W    | UG  | UG   | UG           | UG  |                                  |
| Use of program income earned after the project period  | 200.307(f)                |                                | No obligation to the Federal government  |     |      |     |      |              |     |                                  |
| Use of program income for cost sharing or matching   | 200.307(e)(3)             | R                              | UG   | UG  | R    | UG  | UG   | UG           | R   |                                  |
| <b>Property-related requirements</b>   |                           |                                |  |     |      |     |      |              |     |                                  |
| Title to unused supplies with value of less than \$5,000 at the end of a project                                 | 200.314(a)                | P                              | P  | P   | P    | P   | P    | P            | P   |                                  |
| Acquire real property  | 200.311                   | R                              | UG   | R   | UG   | UG  | UG   | UG           | R   |                                  |
| Encumber real property acquired with federal funds   | 200.311                   | R                              | UG   | R   | UG   | UG  | UG   | R            | R   |                                  |
| Disposition of real property   | 200.311                   | R                              | UG   | R   | UG   | UG  | UG   | R            | R   |                                  |
| Encumber equipment acquired with federal funds   | 200.313                   | R                              | UG   | UG  | UG   | UG  | UG   | R            | R   |                                  |
| Trade in equipment purchased with project funds to buy replacement   | 200.313(c)(4)             | P                              | UG   | P   | UG   | UG  | UG   | UG           | P   |                                  |
| Own equipment upon acquisition without conditions or without obligation to the sponsor at termination of project | 200.313(a)                | P                              | P  | P   | P    | P   | P    | P            | P   |                                  |
| Funding agencies' rights in data   | 200.315                   | R                              | R  | R   | R    | R   | R    | R            | R   |                                  |
| Procurement requirements   | 200.320                   |                                | Implementation delayed until 7/1/2016;<br>Current UW-Madison Purchasing Policies and Procedures apply until 7/1/2016 |     |      |     |      |              |     |                                  |
| Equipment threshold  | 200.33                    |                                | \$5,000 or more, per UW-Madison & Federal policy   |     |      |     |      |              |     |                                  |
| <b>Project Management Requirements</b>   |                           |                                |  |     |      |     |      |              |     |                                  |
| Publication acknowledgment and disclaimers   |                           | Silent                         | R  | R   | R    | R   | R    | R            | R   | Per agency terms & conditions    |
| Additional requirements for use of human subjects beyond those imposed by federal law                            |                           | Silent                         | TBD  | TBD | TBD  | TBD | TBD  | TBD          | TBD | Follow agency terms & conditions |
| Additional requirements for use of anatomical substances beyond those imposed by federal law                     |                           | Silent                         | TBD  | TBD | TBD  | TBD | TBD  | TBD          | TBD | Follow agency terms & conditions |
| Use of sponsor budget forms for budget revisions   |                           | Silent                         | TBD  | TBD | R    | TBD | TBD  | TBD          | TBD | Follow agency instructions       |
| Use of electronic records to meet record retention requirements  | 200.335                   |                                | Permitted  |     |      |     |      |              |     |                                  |

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P - Permitted.

TBD - To be determined.

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