

**INTERNET  
FOR ALL**

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# Award Action Requests (AARs)

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Version 1.0

Broadband Infrastructure Program (BIP)

Connecting Minority Communities (CMC) Pilot Program

Middle Mile Broadband Infrastructure Program (Middle Mile)





# DISCLAIMER

This presentation is for informational purposes only and is intended solely to assist recipients in better understanding the Federal Program and Federal Interest regulations required by the National Telecommunication and Information Administration (NTIA). The guidance does not and is not intended to supersede, modify, or otherwise alter applicable statutory or regulatory requirements, or the specific requirements set forth in each program's Notice of Funding Opportunity (NOFO).

In all cases, statutory and regulatory mandates, and the requirements set forth in the relevant program's NOFO, shall prevail over any inconsistencies contained in the information presented.



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# AAR Overview

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# Overview of AARs



## **Award Action Requests (AARs) = Unfunded Grant Actions (UGAs) = Prior Approvals**

- An AAR is the mechanism a recipient uses to propose a change to their award. An AAR submission prompts the Grants Officer (GO) to amend an award, with approval provided through a CD-451 form or a Non-Funded Administrative Change Letter; which documents the approved amendment to the Financial Award (CD-450).
- Department of Commerce (DOC) awards can only be amended, changed or modified by the assigned National Institute of Standards and Technology (NIST) Grants Management Division (GMD) GO
- AARs include, but are not limited to:



No-Cost  
Extensions



Changes in  
Scope



Subrecipient  
Changes



Changes in  
Key  
Personnel






Budget  
Modifications

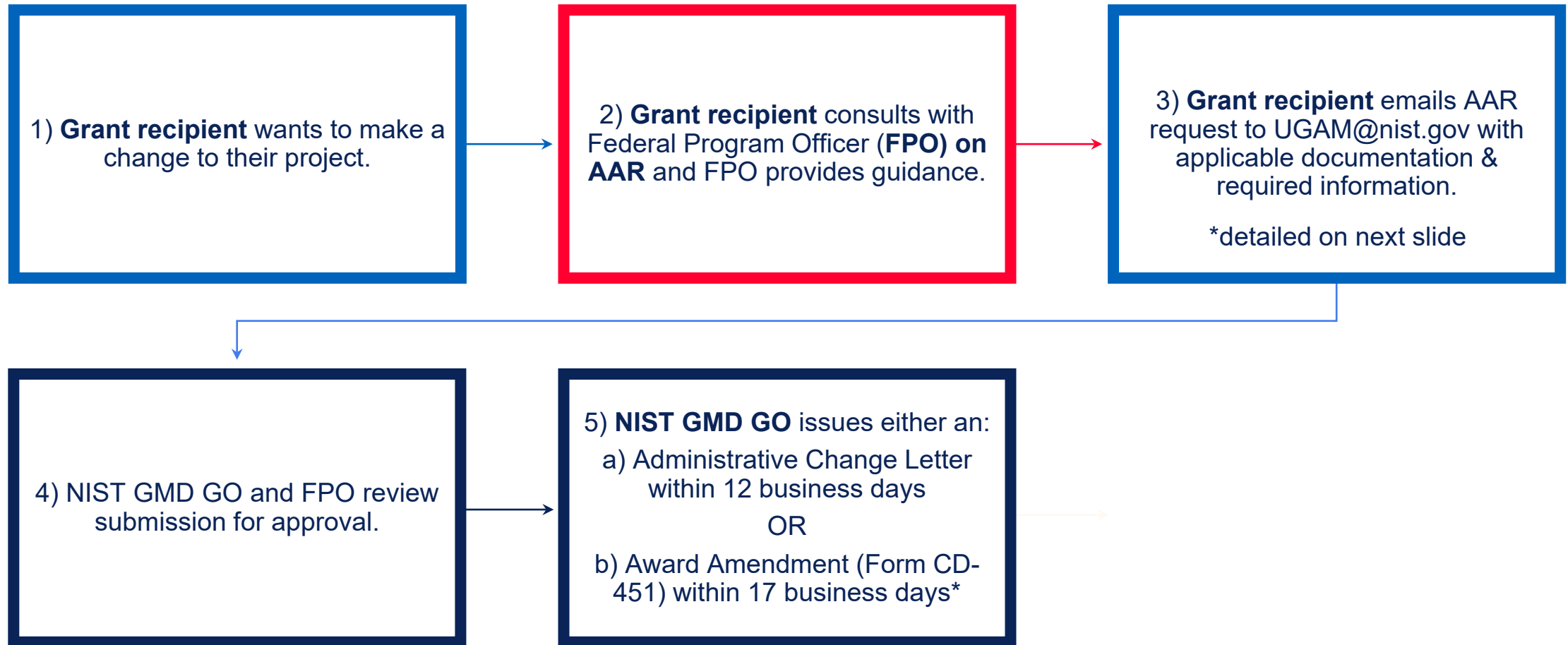


# AAR Process

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# AAR Process

| Key   |                        |
|---|------------------------|
|  | Grant Recipient Action |
|  | FPO Action             |
|  | NIST Action            |



# Recipient Email Submission to UGAM (Step 3 in AAR Process)



- The Authorized Organizational Representative (AOR) is responsible for formally submitting the AAR.
- Send your AAR to [UGAM@nist.gov](mailto:UGAM@nist.gov) with your FPO copied (cc'd).
- The email subject line must include the following:
  - Recipient Name
  - Award Number
  - Authorized Organizational Representative (AOR) or Principal Investigator/Project Director
  - Action being requested (e.g., no-cost extension, change in key personnel, etc.)
- The email body must contain your request and supporting documentation and related correspondence, including justification to support the request.
- Attach the required documents for the AAR type being requested to the email.





# AAR Close-Up

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# Budget Revision

A **Budget Revision** AAR allows a recipient to **amend their approved project budget** but does not change the original award amount. For example...



Travel costs were included in the original budget but increased by more than 10% after award receipt. **A Budget Revision may be required.**



The amount that was budgeted for travel and legal costs is not needed anymore and the recipient would like to transfer those funds to a new cost category, not previously included in the original budget. **A Budget Revision AAR may be required.**



Recipient does not have the expertise to complete part of the project and therefore must hire an expert in that area of the project. The transfer of funds, for this hire, to an existing cost category will be less than 10% of the total awarded amount. **A Budget Revision AAR may not be required.**

*Note: Changes in project scope are not covered by a Budget Revision AAR - a Change in Scope AAR would be used instead.*

# Budget Revision: 10% Rule



In accordance with [2 CFR § 200.308](#):

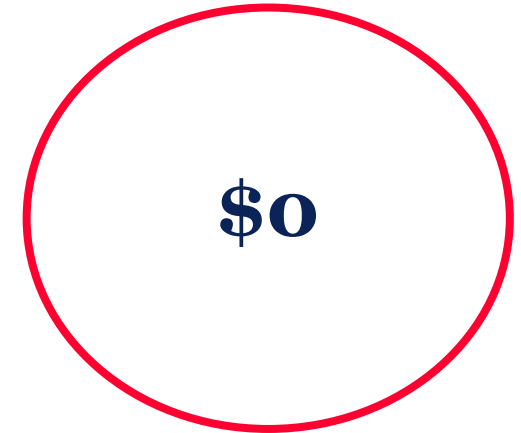


In some cases, moving funds between previously approved direct cost categories may not require a formal budget revision if the change is less than or equal to 10% of the total awarded budget, and the total Federal commitment for the award is less than the simplified acquisition threshold (SAT), currently \$250,000.

**NO CURRENT BIP, CMC OR MM RECIPIENTS FIT THIS CATEGORY**



If the Federal award share exceeds the SAT, transfer of funds among direct cost categories when the cumulative amount of such direct costs exceeds 10% of the total budget (indirect and direct), **must be approved in writing by the Grants Officer.** ([2 CFR § 200.308\(f\)](#))



Additionally, recipients cannot create, transfer, or spend funds at any amount in a cost category budgeted at \$0.00 without Grants Officer approval through a budget revision.



# Budget Revision: Program-Specific Guidance



### Construction Awards (BIP, Middle Mile)

To calculate the 10% threshold on the SF-424C, reference **Line 16. Total Project Costs, Column C. Total Allowable Costs.**



### Non-Construction Awards (CMC)

To calculate the 10% threshold on the SF-424A, reference **Line k. TOTALS, Column 5.**



# Sample: Budget Revision for an SF-424C



While the recipient has not spent their total award amount, they have exceeded the 10% threshold amount, which requires a budget revision.

| Cost Classification                                  | c. Total Allowable Costs | Total Expenditures    | Amount Over Budget  |
|--|--------------------------|-----------------------|---------------------|
| <b>1. Administrative and legal expenses</b>          | <b>\$100,000.00</b>      | <b>\$120,000.00</b>   | <b>\$20,000.00</b>  |
| 2. Land, structures, rights-of-way, appraisals, etc. | \$0.00                   | \$0.00                | \$0.00              |
| 3. State work  | \$0.00                   | \$0.00                | \$0.00              |
| 8. Demolition and removal                            | \$0.00                   | \$0.00                | \$0.00              |
| <b>9. Construction</b>                               | <b>\$2,000,000.00</b>    | <b>\$2,600,000.00</b> | <b>\$600,000.00</b> |
| <b>10. Equipment</b>                                 | <b>\$3,000,000.00</b>    | <b>\$3,400,000.00</b> | <b>\$400,000.00</b> |
| 11. Miscellaneous                                    | \$3,000,000.00           | \$400,000.00          | \$0.00              |
| 12. SUBTOTAL (sum of lines 1-11)                     | \$8,100,000.00           | \$6,520,000.00        | \$0.00              |
| 13. Contingencies                                    | \$500,000.00             | \$250,000.00          | \$0.00              |
| 14. SUBTOTAL   | \$8,600,000.00           | \$6,770,000.00        | \$0.00              |
| 15. Project (program) income                         | \$0.00                   | \$0.00                | \$0.00              |
| 16. TOTAL PROJECT COSTS (subtract #15 from #14)      | \$8,600,000.00           | \$6,770,000.00        | \$0.00              |



# Sample: Budget Revision for an SF-424A



A budget modification is required because the recipient spent funds in a new cost category originally budgeted at \$0.00.

| 6. Object Class Categories             | Total Cost (5)<br>[Federal + Non-Federal]<br>[Reported in SF-424A] | Total Expenditures<br>[Reported in Performance<br>(Technical) Report] | Amount Over Budget<br>[Total Expenditures – Total<br>Cost] |
|--|--|---|--|
| a. Personnel                           | \$25,000.00  | \$20,000.00   | \$0.00   |
| b. Fringe Benefits                     | \$7,000.00   | \$6,500.00  | \$0.00   |
| c. Travel                              | \$8,000.00   | \$9,000.00  | <b>\$1,000.00</b>  |
| d. Equipment                           | \$0.00   | \$0.00  | \$0.00   |
| e. Supplies                            | \$7,500.00   | \$8,000.00  | <b>\$500.00</b>  |
| <b>f. Contractual</b>                  | <b>\$0.00</b>  | <b>\$1,500.00</b>   | <b>\$1,500.00</b>  |
| g. Construction                        | \$0.00   | \$0.00  | \$0.00   |
| h. Other                               | \$275,000.00   | \$200,000.00  | \$0.00   |
| i. Total Direct Charges (sum of 6a-6h) | \$322,500.00   | \$245,000.00  | \$0.00   |
| j. Indirect Charges                    | \$9,000.00   | \$6,000.00  | \$0.00   |
| k. TOTALS (sum of 6i and 6j)           | <b>\$331,500.00</b>  | \$251,000.00  | \$0.00   |



# Budget Revision: Required Documentation

## Required documentation to submit a Budget Revision AAR:



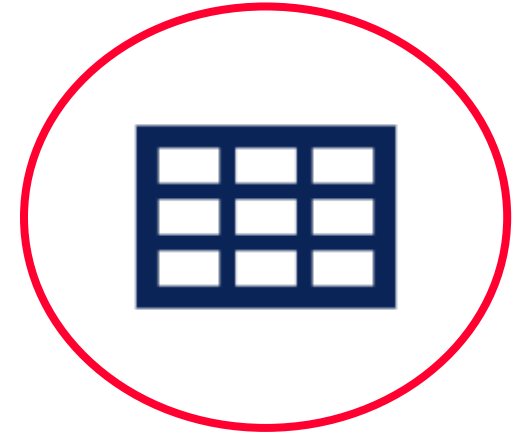
### Updated SF-424A or SF-424C

Revised budget form, specific to the grant requesting revision (e.g., SF- 424A or SF-424C).



### Updated Budget Narrative

Revised budget narrative explaining the proposed funds transfer. The budget narrative should support and justify the change in budget and should specifically highlight the changed amount from the original to revised.



### Updated Budget Detail Justification (spreadsheet)

Spreadsheet with revised budget figures. Updated detailed budget spreadsheet should include all line-item costs broken out by cost category, with the previously approved total cost and the revised total cost.

Individual budget revisions should be reviewed in-line with Federal regulations, specifically [2 CFR 200 Subpart D \(2 CFR § 200.308\)](#) and [Subpart E, DOC Financial Assistance Standard Terms and Conditions](#), and the grant's Specific Award Conditions (SACs).

# Change in Key Personnel

A **Change in Key Personnel** AAR allows a **change to the recipient's key grant administration personnel** specified in the application or award agreement (CD-450). *Key grant administration includes members of the recipient organization that, if removed, would cause a significant impact to the program (AOR, key administrative contact, etc.).* For example...



The recipient's financial administrator who handles all payments and financial transactions leaves the organization and a replacement is hired.



The Authorized Organizational Representative (AOR) leaves the organization and is replaced by a new AOR.



# Change in Key Personnel: Program-Specific Guidance



## Construction Projects (BIP, Middle Mile)

NIST protocols and procedures request recipients of **construction awards** seeking to change key personnel to inform the FPO and NIST and submit such a request to the Grants Office for processing.



## Non-Construction Projects (CMC)

Federal regulations and NIST protocols and procedures require recipients of **non-construction awards** to obtain prior approval for any changes in key personnel specified in the application or Federal Award ([2 CFR § 200.308\(c\)\(2\)](#)).



# Change in Key Personnel: Required Documentation



## **Justification for Change in Key Personnel**

Explain the reason for the change.



## **Resume or Curriculum Vitae (CV) of New Personnel**

Attach the resume or CV of the new key personnel taking the place of the previous personnel.



## **Contact Information for New Personnel**

Provide the name, title, phone number, and email address of new personnel.

Recipients must ensure that all changes in key personnel comply with [2 CFR § 200.308](#), the Specific Award Conditions (SACs), [DOC Financial Assistance Standard Terms and Conditions](#), and the NOFO associated with the grant.

# Change in Scope

A **Change in Scope** AAR allows **a change or shift in the specific goals, objectives, or project areas** approved at the time of the award. For example...



The recipient changes their device distribution plan from loaning laptops to students, to donating laptops to students.



The recipient alters the method of internet delivery (fiber to fixed wireless).



The recipient changes the content of a workshop from the latest artificial intelligence (AI) research to teaching marketing strategies for end designs.

# Change in Scope: Program-Specific Guidance



## **Construction Awards (BIP, Middle Mile)**

Requires prior approval **when there is a proposed budget revision resulting from the change in scope** ([2 CFR 200.308\(h\)\(1\)](#)).



## **Non-Construction Awards (CMC)**

Requires prior approval **for all awards, even if there is no associated budget revision** ([2 CFR 200.308\(c\)\(1\)](#)).



# Change in Scope: Required Documentation



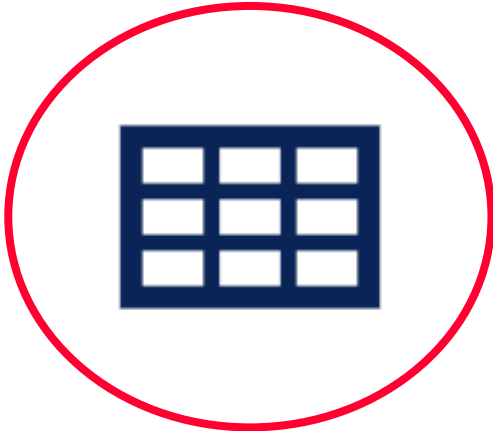
### **Justification for Change in Scope**

Explain the reason for the change.



### **Revised Project Narrative**

The project narrative should specifically highlight the change proposed to the project.



### **Revised Budget Narrative**

(and Updated SF-424A or SF-424C **if a budget change is required**)

The budget narrative should exemplify the change to be made to the budget as a result of the Change in Scope.

Recipients must ensure that all changes in scope comply with Federal regulations, specifically [2 CFR. § 200.308](#), the Specific Award Conditions (SACs), [DOC Financial Assistance Standard Terms and Conditions](#), and the Notice of Funding Opportunity (NOFO) associated with the award.



# No-Cost Extension

A **No-Cost Extension AAR** **extends a project's period of performance** without granting additional funds. An extension may only be granted if permissible under the program's statutory authorization, and certain extensions require the approval of the NTIA Administrator. For example...



Due to supply chain issues, the shipment of the devices (or equipment) purchased by the recipient has been delayed for 9 months, postponing the implementation of the project.



Due to an unexpected hiring freeze that lasted 6 months, the recipient has not been able to hire sufficient project staff to support the project, therefore delaying implementation.

# No-Cost Extension: Program-Specific Guidance



## **BIP & CMC**

The eligible recipient may submit a request for an extension no later than **ninety (90)** calendar days before the end of the award period.



## **Middle Mile**

The eligible recipient may submit a request for an extension no later than **thirty (30)** calendar days before the end of the award period.



# No-Cost Extension: Program-Specific Guidance continued...



## Requirements for submission of a No-Cost Extension AAR (as listed in the NOFO):

For **BIP and Middle Mile**, the eligible recipient must certify within the AAR submission that:

- They have a plan for use of the grant funds;
- The grant-funded construction project is underway; **or**
- Extenuating circumstances require an extension of time to allow the project to be completed.

For **CMC**, the eligible recipient must certify within the AAR submission that:

- They have a plan for use of the grant funds;
- The execution or implementation of the project is underway; **and/or**
- Extenuating circumstances require an extension of time to allow the project to be completed.

No-cost extensions should be reviewed in-line with your program-specific NOFO, Specific Award Conditions (SACs) and the [DOC Financial Assistance Standard Terms and Conditions](#).





# No-Cost Extension: Required Documentation



A detailed explanation of why the project could not be completed by the approved end date



Revised period of performance



Description of the project activities that require support during the extension



An OMB-Approved Budget Form and a detailed budget narrative broken out by cost category for the balance of funds to be carried over into the extended project period

# No-Cost Extension: Required Documentation continued...



NCE request signed by  
the Authorizing Official



Certification for extension per requirement in  
the NOFO



# Additional AARs



| AAR   | Required Documents for Submission   |
|---|---|
| <p><b>Changes to Subawards:</b> An amendment that allows a recipient organization to subaward, transfer, or contract out work to a third-party to perform activities central to the purpose of the award, <b>if subawards were not described in the approved application.</b></p>   | <ol style="list-style-type: none"> <li>1. Description of the work along with budget for each subaward,</li> <li>2. Whether the subaward was competitive or non-competitive and a justification if the subaward was chosen non-competitively</li> </ol>  |
| <p><b>Name Change:</b> An amendment that allows a recipient organization to change its legal name without changing any other aspect of the award (e.g., there are no asset or ownership changes).</p>   | <ol style="list-style-type: none"> <li>1. Documentation of the name change, (e.g., copy of a certificate from a Secretary of State verifying the change for an incorporated party)             <ol style="list-style-type: none"> <li>a. If the name change is by common law, the Grants Officer may instead accept an attestation by the organization's CEO or President.</li> </ol> </li> </ol> |
| <p><b>Novation:</b> An amendment where one organization assumes all duties and liabilities of an organization who has an active award with NIST. The new organization assumes all duties and liabilities for the award <u>from the original start date through the end date of the award.</u></p>   | <ol style="list-style-type: none"> <li>1. Documentation depends on the reason for the novation.             <ol style="list-style-type: none"> <li>a. Ex: If the novation requires a change in address, key personnel, EIN, etc. related documentation for submission will be required.</li> </ol> </li> </ol>  |
| <p><b>Award Transfer:</b> An amendment where the current recipient, the potential transferee, the Program Officer and the Grants Officer agree that it is in the best interest of the Federal Government and the intended beneficiaries of the award to allow the transfer. The new organization is only responsible and liable for the award <u>on and after the effective date of the award transfer.</u></p> | <ol style="list-style-type: none"> <li>1. Award transfers may require change in key personnel documentation, budget revision documentation, and more to update or replace current award records with the transferee's award records.</li> </ol>   |



# NIST Required Documents by Type of AAR



Under DOC rules, the following AARs result in an **Award Amendment (CD-451)** if the AAR is approved:

| AAR Type                  | Description   | Required Documents to Update & Submit   |
|---------------------------|---|---|
| <b>Budget revisions</b>   | Budget revisions allow recipients to amend their approved project budget but may not change the original award amount. Moving funds between previously approved direct cost categories requires a budget revision if the change is in excess of 10% of the total budget. Budget revisions that create a new cost-category from the previously approved budget require Federal approval at any amount. | <ol style="list-style-type: none"> <li>1. Updated SF-424A or SF-424C</li> <li>2. Updated Budget Narrative</li> <li>3. Updated Detailed Budget Justification (Spreadsheet)</li> </ol>  |
| <b>Changes in scope</b>   | Actions likely to be considered a Change in Scope (and therefore require pre-approval) include but are not limited to a change or shift in the specific goals, objectives, or project areas approved at the time of the award.  | <ol style="list-style-type: none"> <li>1. Justification for the change</li> <li>2. Revised Project Narrative</li> <li>3. Revised Budget Narrative and SF-424A if budget change is required</li> </ol>   |
| <b>No-cost extensions</b> | A no-cost extension is an amendment that extends a project's period of performance (PoP) without granting additional funds. No-cost extensions do not change the original award amount, do not permit recipients to perform activities that are not described in the approved project narrative, and may not be exercised merely to utilize unliquidated balances.                                    | <ol style="list-style-type: none"> <li>1. A detailed explanation of why the project could not be completed by the approved end date</li> <li>2. Description of the project activities that require support during the extension</li> <li>3. Revised period of performance</li> <li>4. An OMB-Approved Budget Form (SF-424C for construction programs; SF-424A for non-construction programs) and a detailed budget narrative broken out by cost category for the balance of funds to be carried over into the extended project period</li> <li>5. NCE request signed by the Authorizing Official</li> <li>6. Certification for extension per requirement in the NOFO</li> </ol> |



# NIST Required Documents by Type of AAR continued...



Under DOC rules, the following AARs result in an **Award Amendment (CD-451)** if the AAR is approved:

| AAR Type                    | Description   | Required Documents to Update & Submit   |
|-----------------------------|---|---|
| <b>Name Change</b>          | An amendment that allows a recipient organization to change its legal name without changing any other aspect of the award (e.g., there are no asset or ownership changes).  | <ol style="list-style-type: none"> <li>1. Documentation of the name change, e.g., copy of a certificate from a Secretary of State verifying the change for an incorporated party                         <ol style="list-style-type: none"> <li>a. If the name change is by common law, the Grants Officer may instead accept an attestation by the organization's CEO or President.</li> </ol> </li> </ol> |
| <b>Changes to Subawards</b> | An amendment that allows a recipient organization to subaward, transfer, or contract out work to a third-party to perform activities central to the purpose of the award, <b>if subawards were not described in the approved application.</b> | <ol style="list-style-type: none"> <li>1. Description of the work along with budget for each subaward,</li> <li>2. Whether the subaward was competitive or non-competitive and a justification if the subaward was chosen non-competitively</li> </ol>  |



# NIST Required Documents by Type of AAR continued...



Under DOC rules, the following AARs result in an **Award Amendment (CD-451)** if the AAR is approved:

| AAR Type              | Description   | Required Documents to Update & Submit  |
|-----------------------|---|--|
| <b>Novation</b>       | Appropriate when one organization assumes all duties and liabilities of an organization who has an active award with NIST. The new organization assumes all duties and liabilities for the award <u>from the original start date through the end date of the award.</u>   | <ol style="list-style-type: none"> <li>1. Documentation depends on the reason for the novation.                             <ol style="list-style-type: none"> <li>a. Ex: If the novation requires a change in address, key personnel, EIN, etc. related documentation for submission will be required.</li> </ol> </li> </ol> |
| <b>Award Transfer</b> | Appropriate when the current recipient, the potential transferee, the Program Officer and the Grants Officer agree that it is in the best interest of the Federal Government and the intended beneficiaries of the award to allow the transfer. The new organization is only responsible and liable for the award <u>on and after the effective date of the award transfer.</u> | <ol style="list-style-type: none"> <li>1. Award transfers may require change in key personnel documentation, budget revision documentation and more to updated or replace current award records with the transferee's award records.</li> </ol>  |

The following AAR results in an **administrative change letter** if approved.

| AAR Type                        | Description   | Required Documents to Update & Submit  |
|---------------------------------|---|--|
| <b>Changes in Key Personnel</b> | A change to the recipient's key grant administration personnel specified in the application or award agreement (CD-450) | <ol style="list-style-type: none"> <li>1. Explanation/Justification for change in key personnel request</li> <li>2. Resume or Curriculum Vitae for the new personnel</li> <li>3. Contact information (name, title, phone and email) for new personnel</li> </ol> |



# AAR Resources

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# AARs Resources



Below are the current AAR resources available for NTIA recipients, by program.

- Program Recipient Handbook
  - [CMC](#)
  - [BIP](#)
- Notice of Funding Opportunity (NOFO)
  - [CMC NOFO](#)
  - [BIP NOFO](#)
  - [Middle Mile NOFO](#)
- SACs within your CD-450 under “Prior Approvals”
- [eCFR : 2 CFR § 200.308 -- Revision of budget and program plans.](#)
- [Department of Commerce \(DOC\) Financial Assistance Standard Terms and Conditions](#)





**Q & A**

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# THANK YOU

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Connecting Minority Communities (CMC) Pilot Program: [cmc@ntia.gov](mailto:cmc@ntia.gov)

Broadband Infrastructure Program (BIP) : [bbinfra@ntia.gov](mailto:bbinfra@ntia.gov)

Middle Mile Broadband Infrastructure Program (Middle Mile): [middlemile@ntia.gov](mailto:middlemile@ntia.gov)

