
INTERNET FOR ALL

Recipient Revision Request Guidance

Program: Tribal Broadband Connectivity Program (TBCP)

*Grants Office: National Oceanic and Atmospheric Administration
(NOAA)*



U.S. Department of Commerce

National Telecommunications and Information Administration

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1. Introduction

1. Introduction

This guide is designed to help Department of Commerce (DOC) National Telecommunications and Information Administration (NTIA) Office of Internet Connectivity and Growth (OICG) grant recipients understand the process for requesting certain Revision Requests (RRs) in the National Institutes of Health (NIH) [eRA Commons](#) system. The following guidance is specifically for Tribal Broadband Connectivity Program (TBCP) recipients awarded under the first [Notice of Funding Opportunity \(NOFO\)](#) released on June 3, 2021, with the National Oceanic Atmospheric Administration (NOAA) as their Grants Office.

This guide only includes the most common types of RRs. If you need assistance with an RR not included in this guide, please contact your Federal Program Officer (FPO) and Grants Management Specialist (GMS).

1.1. Disclaimer

This resource is not intended to supersede, modify, or otherwise alter applicable statutory or regulatory requirements, the specific requirements set forth in program NOFOs, existing [DOC Grants and Cooperative Agreements Manual](#) (Grants Manual) requirements, or other Departmental Administrative Orders (DAOs) and Federal Circulars. Similarly, this guidance document does not supersede or supplement NOAA Grants Management Division (GMD) policy and procedures related to their work on financial assistance awards. In all cases, statutory and regulatory mandates, and the requirements set forth in the NOFO, shall prevail over any inconsistencies contained in this guidance.

1.2. How to Use This Guide

When submitting an RR request:

1. First, review [Section 1](#) of this guide to ensure you are familiar with the overarching RR requirements, roles, timeline, and submission process.
2. Refer to the relevant RR section for specific requirements and mandatory documentation.
 - a. [Section 2: Budget Revision](#)
 - b. [Section 3: Change in Key Personnel](#)
 - c. [Section 4: Change in Scope](#)
 - d. [Section 5: Subaward, Transfer, or Contract Out Work](#)
3. Review all drafted documentation against the Best Practices Checklist in [Section 1.7](#).
4. Submit the RR in eRA Commons using the instructions in [Section 1.8](#).

Note that guidance for No Cost Extension RRs is available separately on the [BroadbandUSA website](#).

1.3. Resources and Requirements

Recipients should ensure all RRs comply with:

- Current Standard and Specific Award Conditions (SACs)
- Regulations outlined in 2 CFR Part 200
- [DOC Financial Assistance Standard Terms and Conditions](#)
- [TBCP Fiscal Year 2021 NOFO](#)
- [eRA Commons User Guides](#)

1. Introduction

If you need assistance with eRA Commons, please contact the Help Desk [on their website](#) or by calling 1-866-504-9552 (press 1 for eRA Commons).

1.4. What is a Revision Request?

An RR, previously referred to as an Award Action Request (AAR) in the NOAA Grants Online system, is the mechanism grant recipients use to propose changes to their award in response to an event(s) that may occur within the grant lifecycle as grant recipients execute contracts, receive bids, and make amendments to projects. RRs allow recipients to amend an aspect (budget, scope, key personnel, etc.) of their approved project, but RRs may not change the original award amount.

1.5. Revision Request Roles

Recipients should establish who within their internal structure will be responsible for gathering and compiling information for the RR to be requested. Ideally, this individual should be familiar with the project, understand the reasoning behind the change request, and be able to quickly update and amend documents required for the request. Regardless of who assembles the RR materials, the Signing Official (SO) is responsible for formally submitting the RR in eRA Commons.

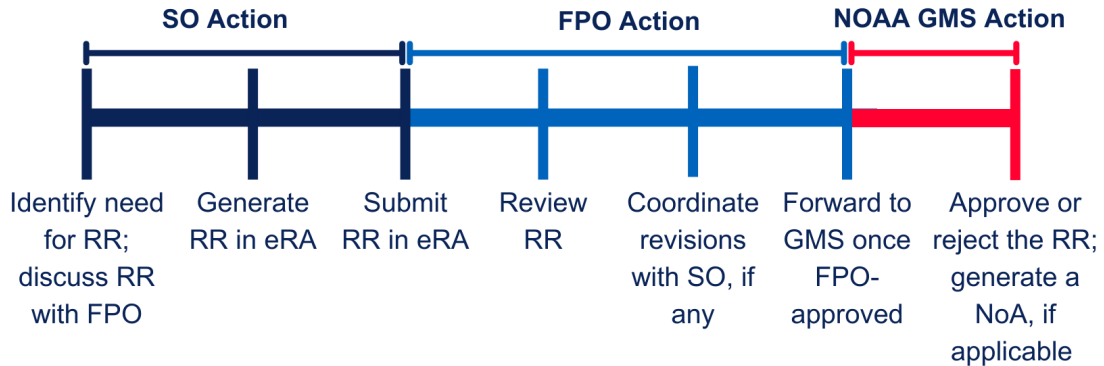
<p>SIGNING OFFICIAL (SO)</p> <p>Submits the Revision Request in eRA Commons. The organization’s Authorized Organization Representative (AOR) should be assigned the SO role.</p>	<p>FEDERAL PROGRAM OFFICER (FPO)</p> <p>Reviews the Revision Request and coordinates with the recipient on revisions, if any. Forwards the Revision Request to NOAA once FPO-approved.</p>	<p>GRANTS MANAGEMENT SPECIALIST (GMS)</p> <p>Reviews and approves the Revision Request. Generates a new Notice of Award (NoA) if applicable.</p>

1.6. Revision Request Timeline

The timeframe for RR approval varies depending on the completeness of the initial request and if any additional information is requested by the NOAA Grants Office. Some approved RRs will result in the generation of a revised Notice of Award (NoA).

1. Introduction

In addition to the SO, the Account Administrator (AA) and/or Administrative Official (AO) may be involved in creating new user accounts to reflect approved Changes in Key Personnel RRs.



1.7. Best Practices Checklist

✓	Best Practice
<input type="checkbox"/>	Notify your FPO in advance of upcoming RRs.
<input type="checkbox"/>	Submit RRs as soon as possible so there is sufficient time to process them.
<input type="checkbox"/>	Review all submissions for typos and errors.
<input type="checkbox"/>	Check that the financial numbers and project information match across all documentation.
<input type="checkbox"/>	Maintain working documents in their original format (e.g., .doc) and use a separate 'Archive' folder to capture older versions.
<input type="checkbox"/>	Convert all files into flattened PDFs before submitting to eRA Commons. Provide the files in their original format to your FPO via email.
<input type="checkbox"/>	Before submitting the RR, ensure all necessary documents have been attached.
<input type="checkbox"/>	Ensure that budget information matches what was approved in the SF-424 A or C.

1.8. Revision Request Submission in eRA

Recipients with the SO role should reference the following steps when submitting an RR.

Note: eRA Commons will only accept PDFs. Convert all relevant documentation to a flattened PDF before submission. Provide files in their original format (e.g., Excel, mapping shapefiles) to your FPO via email.

eRA Commons Submission Process:

1. Log into eRA Commons.
2. Navigate to the **Status** module.
3. SOs use **Status search** options to search for the award.
4. In Status search results, click the award's **three dot ... menu** and select **Revision Request**.
5. Access the RR for an award. The *Revision Request List* screen appears. If there are RRs in progress, they are listed here.
6. Click the **Initiate a New Revision Request** button to initiate a new request. Choose the correct RR type from the **Revision Request Sub type** dropdown and click

1. Introduction

the **Go** button. Note that the **Description** and **Justification Document** fields are required for all requests.

7. Fill out the required fields (which have a red asterisk) and any optional fields. The Justification document is required. You can upload up to ten files per upload type. Request History contains a record of when you or other colleagues previously saved the request.
8. Save or Submit the request:
 - a. To save the information and come back to it later, click **Save**.
 - b. To submit it to the awarding agency for consideration, click **Submit**.
9. A *Confirmation* popup appears; click **Yes**. A green bar appears on the *Revision Request List* screen indicating successful submission.

Note that **Change in Scope** and **Subaward, Transfer or Contract Out Work Under the Award if not Described in the Approved Application** RRs will result in a revised NoA.

2. Budget Revision

2. Budget Revision

A change to the recipient's previously approved budget to accommodate substantive revisions to planned funding expenditures in line with changed budgetary costs. A budget revision does not change the original award amount.

Budget revisions are submitted in eRA Commons as a "Rebudget – Prior Approval Required" RR. Budget revisions may also be referred to as budget modifications or re-budgets.

Simplified Acquisition Threshold: In accordance with 2 CFR § 200.308(f), transfers of funds by the recipient among direct cost categories are permitted without a budget revision for awards in which the federal share of the project is equal to or less than the Simplified Acquisition Threshold, currently \$250,000 as of June 20, 2018, pursuant to Office of Management and Budget (OMB) memo 18-18.

For awards in which the federal share of the project exceeds the Simplified Acquisition Threshold, budget revisions must be approved by the Grants Officer under the following conditions:

10% Rule: The recipient transfers funds between existing direct cost categories, and the cumulative amount of the direct costs transfers exceeds 10% of the most recently approved total project budget.

New Cost Categories: The recipient transfers funds into a cost category that was unfunded in the most recently approved project budget (e.g., shifting funds from a contract that did not use all of their funds to pay for travel costs that were not in the most recently approved budget).

2.1. Determining If a Budget Revision is Required

To calculate the 10% threshold, utilize the total budget recorded on the last approved SF-424A or SF-424C.¹

- **SF-424A:** Line k. TOTALS, Column 5
- **SF-424C:** Line 16. Total Project Costs, Column c. Total Allowable Costs

For dual type projects, sum the SF-424A and SF-424C values indicated above to determine the total budget, then calculate the 10% threshold.

Approved Total Budget x .10 = 10% Rule Threshold

If you are uncertain if a budget revision is required, contact your FPO!

¹ Note that the regulatory language at 2 CFR § 200.308(f) only applies to transfers of direct costs categories; however, the total budget (including both direct and indirect costs) should be used to determine whether a transfer exceeds 10% of the total budget, per the [DOC Standard Terms and Conditions](#).

2. Budget Revision

2.2. Budget Revision Documentation

Official documentation is required if a recipient wishes to make significant budget modifications.

Requests to change and/or add program objectives or tasks that do not involve a transfer of funds between direct cost categories **do not constitute** a budget revision and should instead be submitted as a Change in Scope RR.

If a Re-Budget RR includes a request for a No Cost Extension, the recipient must also submit a No Cost Extension RR.

eRA Field	Required Documentation
Description	Description containing: <ul style="list-style-type: none"> Effective date for the budget revision
Justification Document	Budget Narrative explaining the proposed funds transfer. <ul style="list-style-type: none"> This should support and justify the change in budget. Highlight the changed amount from the original budget to the revised.
Justification Document	Detailed Budget Justification spreadsheet with revised budget figures supporting the requested change. <ul style="list-style-type: none"> This should include all line-item costs broken out by cost category. For each line item, provide the previously approved total cost and the revised total cost.
Budget Document	SF-424 A or C budget form that shows the total funding for the award. <ul style="list-style-type: none"> SF-424C: Infrastructure Deployment and Planning projects SF-424A: Use and Adoption projects
Other Supporting Documentation	Large budget revisions may require additional supporting documentation, including but not limited to: <ul style="list-style-type: none"> Contract documents Cost estimates Amendments Maps Request for Proposals (RFP), Request for Qualifications (RFQ), or Bid Documents Updated Policies Work with your FPO to determine if additional documentation is needed.

2.3. Example: 10% Rule Calculation Within SF-424A

This example is of a Use and Adoption project, which uses the SF-424A budget form:

- Total Budget** (Direct + Indirect Costs) = \$331,500
- 10% threshold** = \$33,150
 - $\$331,500 \times .10 = \$33,150$

This means the recipient can transfer funds between any previously funded cost categories in aggregate up to \$33,150 without needing a budget revision.

2. Budget Revision

In this example, the recipient transferred a total of \$3,000 into three cost categories (c. Travel, e. Supplies, and f. Contractual). While they have only transferred \$3,000 between budget categories, which is well below the 10% threshold of \$33,150, **a budget revision is required** because they transferred funds to a cost category that was previously budgeted at \$0.00 (f. Contractual). **If they had previously allocated funds to the Contractual cost category, a budget revision would not be required.**

SF-424A Example 10% Rule Calculation

6. Object Class Categories	Total Cost (5) [Federal + Non-Federal] [Reported in SF-424A]	Total Expenditures [Reported in Performance (Technical) Report]	Amount Transferred Between Cost Categories [Total Expenditures – Total 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	\$1,000.00
d. Equipment	\$0.00	\$0.00	\$0.00
e. Supplies	\$7,500.00	\$8,000.00	\$500.00
f. Contractual	\$0.00	\$1,500.00	\$1,500.00
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	-
j. Indirect Charges	\$9,000.00	\$6,000.00	\$0.00
k. TOTALS (sum of 6i and 6j)	\$331,500.00	\$251,000.00	-

2.4. Example: 10% Rule Calculation Within SF-424C

This example is of an Infrastructure Deployment project, which uses the SF-424C budget form:

- **Total Budget** (Direct + Indirect Costs) = \$8,600,000
- **10% threshold** = \$860,000
 - $\$8,600,000 \times .10 = \$860,000$

This means the recipient can transfer funds between funded cost categories in aggregate up to \$860,000 without needing a budget revision.

In this example, the recipient has transferred \$1,020,000 between three budgeted cost categories. Because they have surpassed the 10% threshold amount of \$860,000, **a budget revision is required** to increase the cost categories where funds are needed.

2. Budget Revision

SF-424C Example 10% Rule Calculation

Cost Classification	c. Total Allowable Costs [Reported in SF-424C]	Total Expenditures [Reported in Performance (Technical) Report]	Amount Transferred Between Cost Categories [Total Expenditures – Total Allowable Costs]
1. Administrative and legal expenses	\$100,000.00	\$120,000.00	\$20,000.00
2. Land, structures, rights-of-way, appraisals, etc.	\$0.00	\$0.00	\$0.00
3. Relocation expenses and payments	\$0.00	\$0.00	\$0.00
4. Architectural and engineering fees	\$0.00	\$0.00	\$0.00
5. Other architectural and engineering fees	\$0.00	\$0.00	\$0.00
6. Project inspection fees	\$0.00	\$0.00	\$0.00
7. Site work	\$0.00	\$0.00	\$0.00
8. Demolition and removal	\$0.00	\$0.00	\$0.00
9. Construction	\$2,000,000.00	\$2,600,000.00	\$600,000.00
10. Equipment	\$3,000,000.00	\$3,400,000.00	\$400,000.00
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	-
13. Contingencies	\$500,000.00	\$250,000.00	\$0.00
14. SUBTOTAL	\$8,600,000.00	\$6,770,000.00	-
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	-

2.5. Additional Budget Revision Trigger Examples

See the table below for examples demonstrating when a Re-Budget RR may be required, as well as scenarios when an RR is generally not required.

Note that even if an RR is not required, all funds must still be used for an authorized purpose under the award.

2. Budget Revision

Example	Example Reason for Change	Action	Explanation
Travel Costs	Travel costs were included in the original budget, but increased after award receipt	Calculate 10%. If under the threshold, approval may not be necessary.	If the total increase is less than or equal to 10% of the total award and funds can be transferred from another direct cost category to cover these costs, a Re-Budget RR may not be necessary.
Facilities and Administration (F&A) Costs (indirect costs)	Building rental cost increases	Calculate 10%. If under the threshold, approval may not be necessary.	Transfers of funds between direct and indirect cost categories does not require prior approval as long as the total budget remains the same and the new use of funds is authorized under the award. Note that per the TBCP SACs, total costs incurred for indirect costs plus the total costs incurred for direct administrative costs cannot exceed more than 2% of the total award.
Contract Amendment	Existing contract is modified to include mapping costs	Calculate 10%. If under the threshold, approval may not be necessary.	If the total increase is less than or equal to 10% of the total award and funds can be transferred from another direct cost category to cover these costs, a Re-Budget RR may not be necessary. However, contracting for activities that are central to the purpose of the award will require submission of a Subaward, Transfer, or Contract Out Work RR.
Moving funds from an approved cost category to an unapproved cost category	Amount budgeted for travel and legal costs is no longer needed; Recipient did not previously budget for any contractors but would like to hire one	Request prior approval if moving funds to a cost category previously budgeted as \$0, regardless of the 10% threshold.	If funds are transferred into a new cost category, a Re-Budget RR is required , regardless of the amount.
Moving funds from an approved cost category to create a new position, hire new contractors, or make a subaward	Recipient justifies the need for additional expertise to complete part of their project and must therefore hire an expert in that area	Request prior approval if moving funds to a new cost category. Calculate 10% if transferring funds to an existing cost category. If under the threshold, approval may not be necessary.	If funds are moved from one cost category to another category that was previously approved and funded under the award and the total amount transferred is at or under 10% of the total award, a Re-Budget RR may not be necessary. However, the recipient must submit a Subaward, Transfer, or Contract Out Work RR.

3. Change in Key Personnel

3. Change in Key Personnel

A change to the recipient's key grant administration personnel previously specified in the application or Notice of Award (NoA).

There are two types of Change in Key Personnel RRs in eRA Commons:

1. Change in Principal Investigator / Project Director (PI/PD)
2. Change in Key Person Specified in the Application

Use & Adoption Recipients: Per 2 CFR 200 Subpart D § 200.308, non-construction projects must request prior approval before undergoing a change in a key person specified in the application or federal award.

Infrastructure Deployment and Planning Recipients: The NOAA Grants Office asks construction projects to notify them of changes in key personnel via the eRA Commons RR process.

3.1. Change in Key Personnel Examples

Key grant administration changes that constitute a Change in Key Personnel RR include members of the recipient organization that, if removed, would cause a significant impact to the project. For example, any change in the AOR, PI/PD, chief financial officer, or technical personnel listed on the CD-450 or application material would require an RR.

Examples of when a Change in Key Personnel RR is likely required include but are not limited to:

- The recipient's financial administrator who handles all payments and financial transactions leaves the organization.
- The recipient hired a Project Manager who was originally listed as "to be determined" in the application.
- Due to a Tribal election, the AOR needs to be replaced by a newly elected AOR.

3.2. Removing Personnel

If a recipient wishes to remove key personnel from their project without adding anyone new, an RR is not usually necessary, unless the key personnel is a PI/PD on a Use & Adoption project.

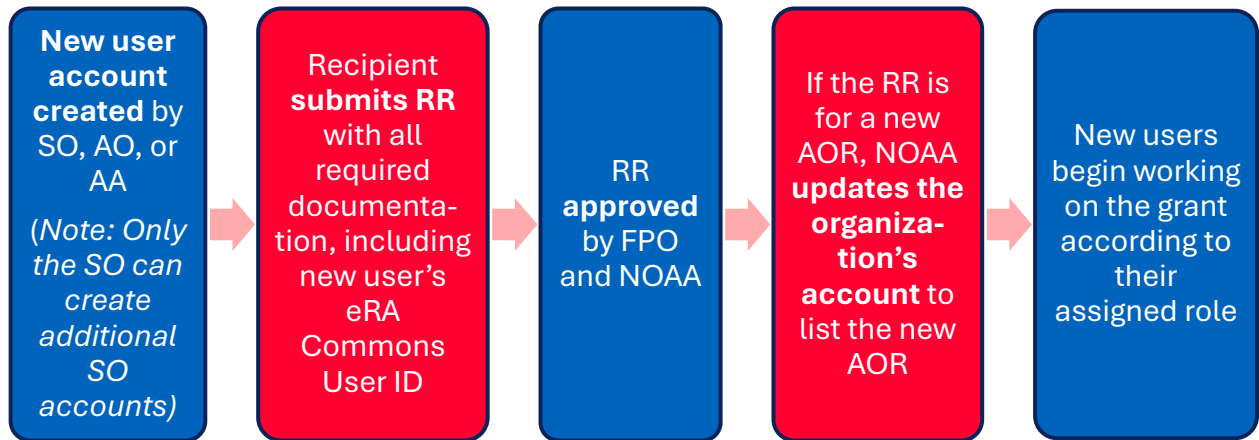
Per 2 CFR § 200.308(c)(3), prior approval is required if a PI/PD disengages from a non-construction project for more than three months, or there is a 25% reduction in their time devoted to the project. In this situation, recipients must submit a **Disengagement for More than 3 Months, or 25% Reduction by Project Director or PI** RR. This type of RR is not covered in this guide.

Please review your organization's policies for removing the employee's access to the grant's administrative, financial, and all other data. Similarly, please ensure that the separated employee no longer has access to the project's equipment and other material assets. Please recover all grant-related equipment from the separated employee. Finally, follow your organization's policies about communicating the separation to your project team, collaborators, and vendors/contractors.

3. Change in Key Personnel

In all cases, if an individual is removed from a project, the recipient should ensure that the individual no longer has access to eRA Commons or project-related materials. Refer to the [Account Management Module \(AMM\) User Guide](#).

3.3. Change in Key Personnel Process



Recipients should refer to the [eRA Commons User Guide](#) for step-by-step instructions on creating new user accounts.

3.4. Change in Key Personnel Documentation

Although there are two types of Change in Key Personnel RRs, both require the same types of documentation.

eRA Field	Required Documentation
Description	Description containing: <ul style="list-style-type: none"> Name and title of new personnel Effective date for the change in personnel
Justification Document	Letter on Tribal letterhead signed by the AOR containing: <ul style="list-style-type: none"> Contact information (name, email, phone number, address) for new personnel Effective date for the change in personnel Justification for the change in personnel eRA Commons User ID for the new personnel
Justification Document	Resume or Curriculum Vitae (CV) for the proposed new personnel ²

² Note: If the recipient's SO is a Tribal Leader who is NOT key personnel (i.e., not charging to the grant), the requirement to provide a resume or CV is waived. However, the justification should include the Tribal Leader's name and role and note that they are not key personnel.

4. Change in Scope

4. Change in Scope

A change or shift in the specific direction, goals, objectives, purposes, or project areas of the approved project.

Use & Adoption Recipients: Per 2 CFR § 200.308(c)(1), non-construction projects need prior approval for any changes in scope, even if there is no associated budget revision.

Infrastructure Deployment and Planning Recipients: Per 2 CFR § 200.308(h)(1), construction projects must request prior approval for a change in scope that also results in a budget revision. Per the TBCP standard and specific award conditions (SACs), any change in scope that has the potential to alter the nature or extent of cultural resources impacts must be brought to the attention of NTIA and will be re-evaluated for compliance with applicable regulatory requirements. *See the definition of Scope Change in the blue box above.*

4.1. Change in Scope Examples

Examples of when a Change in Scope RR is likely required include but are not limited to:

- The recipient designated the location of a wireless tower in their application, but now wants to move it to a different location.
- The recipient alters the method of internet delivery (e.g., fiber to fixed wireless).
- The recipient needs to reduce the scope of their project (e.g., building four wireless towers instead of six) due to price increases.
- The recipient wants to change the previously approved fiber route.
- The recipient wants to change the project service area.
- The recipient originally planned to purchase a laptop for every community member, but increases in price reduce the number of laptops they can purchase and distribute.

4.2. Change in Scope Documentation

Any change in scope that results in a decrease in federal funding (descope) must be accompanied by an SF-424A or SF-424C and a budget narrative describing the planned expenditure of the remaining funds. If the change in scope includes a budget revision, the recipient must also submit a Re-budget – Prior Approval Required RR.

If a Change in Scope request includes a request for a No Cost Extension, the recipient must also submit a No Cost Extension RR.

eRA Field	Required Documentation
Description	Description containing: <ul style="list-style-type: none"> • Effective date for the change in scope
Justification Document	Letter on Tribal letterhead signed by the AOR containing: <ul style="list-style-type: none"> • Justification for the change in scope
Justification Document	Revised Project Narrative
Budget Documentation	If a budget change is required: Revised Budget Narrative
Budget Documentation	If a budget change is required: SF-424 A or C budget form that shows the total funding for the award. <ul style="list-style-type: none"> • SF-424C: Infrastructure Deployment and Planning projects • SF-424A: Use and Adoption projects

4. Change in Scope

eRA Field	Required Documentation
<p>Other Supporting Documentation</p>	<p>Substantial changes in scope may require additional supporting documentation, including but not limited to:</p> <ul style="list-style-type: none"> • Contract documents • Cost estimates • Amendments • Maps <p>Work with your FPO to determine if additional documentation is needed.</p>

5. Subaward, Transfer, Contract Out Work

5. Subaward, Transfer, Contract Out Work

The subawarding, transferring, or contracting out of any work under a federal award, if not approved in the award application.

This guidance **does not** include the requirements to transfer an award to a different organization. Please contact your assigned FPO and the Grants Office with any questions regarding an award transfer.

Use & Adoption Recipients: Per 2 CFR § 200.308(c)(6), non-construction projects must request prior approval before they subaward, transfer, or contract out work if not described in the approved application. If the services or work that is proposed for subaward, transfer, or contract was identified in the initial grant application and funded in the approved federal award, then an RR is not required.

Infrastructure Deployment & Planning Recipients: The NOAA Grants Office also asks construction projects to notify them of subawards, transfers, or contracts, per the [DOC Standard Terms and Conditions](#) (.04 Prohibition against Assignment by a Non-Federal Entity).

A recipient may acquire supplies, material, equipment, or general support services through a subaward, transfer, or contract without a Subaward, Transfer, or Contract Out Work RR.

5.1. Subaward, Transfer, or Contract Out Work Examples

Actions likely to require a Subaward, Transfer, or Contract Out Work RR include but are not limited to:

- Designating a subrecipient or contractor that was listed as “TBD” in the approved application;
- Working with a subrecipient or contractor that was not identified in the approved application; or
- Replacing an organization identified in the approved application with a different subrecipient or contractor.

5.2. Subaward, Transfer, or Contract Out Work Documentation

eRA Field	Required Documentation
Description	Description containing: <ul style="list-style-type: none"> • Effective date for the subaward or contract out work
Justification Document	Justification on Tribal letterhead containing: <ul style="list-style-type: none"> • Description of the work • Reason why the work is being subawarded or contracted out • How the subaward or contractor was chosen (e.g., sole source, competitive bid) If the subaward or contract was chosen <u>non-competitively</u> , you must also include justification for that decision.
Budget Document	Budget for each subaward or contractor