



## Consolidated Appropriations Act (CAA) Programs

Frequently Asked Questions: Award Action Requests (AARs) for Consolidated Appropriations Act (CAA) Grant Recipients with National Institute of Standards and Technology (NIST) Financial Assistance Agreements Management Office (FAAMO) as their Grants Office

*This document is for informational purposes only and is intended solely to assist recipients in better understanding the Award Action Request process required by National Telecommunication and Information Administration (NTIA) and the National Institute of Standards and Technology (NIST) Financial Assistance Agreements Management Office (FAAMO). This guidance does not and is not intended to supersede, modify, or otherwise alter applicable statutory or regulatory requirements, or the specific application requirements set forth in the programs' Notices of Funding Opportunity (NOFOs). In all cases, statutory and regulatory mandates, and the requirements set forth in the programs' NOFOs, shall prevail over any inconsistencies contained in the information presented.*

### **Q: Where do recipients submit Award Action Requests (AARs) and who should be included on the submission email?**

A: Grant recipients should submit AARs to the Unfunded Grant Action Mailbox (UGAM), or [UGAM@nist.gov](mailto:UGAM@nist.gov), with their Federal Program Officer (FPO) copied on the email. For specific AAR submission instructions, grant recipients should refer to the UGAM Specific Award Condition (SAC) located in their CD-450.

### **Q: Do FPOs need to approve AARs prior to submission?**

A: Grant recipients should consult with their assigned FPO to review the proposed request prior to officially submitting an AAR to UGAM. After the AAR is submitted to UGAM, the FPO will provide their formal approval to NIST.

### **Q: How long does an AAR approval from NIST FAAMO take? How will a grant recipient know when it is approved?**

A: Approval time depends on the type of AAR the grant recipient submits. If the AAR results in an administrative change letter only, NIST FAAMO will typically return an approval within 12 business days from the date of the AAR package submission. If the AAR results in a Notice of Award (NoA), NIST FAAMO will typically return an approval within 17 business days from the date of the AAR package submission. This timeline may be longer if the grant recipient must revise the original submission.

When NIST approves an AAR, the grant recipient will receive an email from NIST FAAMO with a NoA form and/or an administrative change letter documenting the award amendment. The recipient should save these documents in their grant file.

**Q: What documents do grant recipients need to include for each type of AAR submission?**

A: Each type of AAR requires different forms of documentation. Please refer to the list below for information on documentation required for the most common types of AARs. Recipients may also reference the [NIST Financial Assistance Reference Guide](#), the [NIST Recipient AAR Guidance](#), and their program-specific SACs for additional information on AARs. If grant recipients have additional questions on AAR documentation requirements, they should contact their assigned FPO.

**No-Cost Extension AAR Required Documents:**

- Justification for the change that includes 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 Office of Management and Budget (OMB) approved budget form (SF-424A for non- construction projects or SF-424C for construction projects) and updated 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 request signed by the Authorizing Official;
- Per the NOFO, certification that:
  - The grant recipient has 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.

**Change in Scope AAR Required Documents:**

- Justification for the change;
- Updated project narrative specifically highlighting the change proposed to the project;
- If a budget change is required:
  - Updated OMB approved budget form (SF-424A for non-construction projects or SF-424C for construction projects)
  - Revised budget narrative that exemplifies the change to be made to the budget as a result of the change in scope.

**Change in Key Personnel AAR Required Documents:**

- Justification for the change;
- Resume or Curriculum Vitae (CV) of the new key personnel;
- Contact information for the new key personnel, including name, title, phone number, and email address.

**Budget Revision AAR Required Documents:**

- Justification for the change;
- Updated OMB approved budget form (SF-424A for non-construction projects or SF-424C for construction projects);
- Updated budget narrative that supports and justifies the change in budget and specifically highlights the changed amount from the original (or last approved budget) to revised;
- Updated detailed budget justification (submitted as a spreadsheet) with revised budget figures, including all line-item costs broken out by cost category, the previously approved total cost, and the revised total cost.

**Q: How can grant recipients determine if a proposed change to their project constitutes a Change in Scope AAR?**

A: A Change in Scope AAR is required when there will be a change in the specific goals, objectives, project activities (e.g. device distribution plan changes, internet delivery method changes, etc.), or project areas that were approved at the time of the award. For construction projects, a Change in Scope AAR is required when there is a proposed budget revision resulting from the change in scope (2 CFR § 200.308(h)(1)). For non-construction projects, a Change in Scope AAR is required when the above conditions are met even if there is no associated budget revision (2 CFR § 200.308(c)(1)).

In all cases, grant recipients should consult with their assigned FPO for further guidance on whether the proposed change requires a Change in Scope AAR.

**Q: What budget information is required for grant recipients submitting a No-Cost Extension AAR? Can grant recipients seeking a no-cost extension submit a budget that exceeds their previously approved budget?**

A: When submitting a No-Cost Extension AAR, the grant recipient must submit a budget modification with the extension request. The budget modification should include an updated OMB approved budget form (SF-424A for non-construction projects or SF-424C for construction projects) and a detailed budget narrative broken out by cost category for the balance of funds to be carried over into the extended project period. The remaining obligated (but unliquidated) funds must be budgeted through the requested end date. Any funds expended prior to the no-cost extension should not be re-budgeted, as these funds have already been expended. Grant recipients may not request additional funds with No-Cost Extension AARs.

**Q: When can grant recipients submit a No-Cost Extension AAR?**

A: Per the program NOFOs, Broadband Infrastructure Program (BIP) and Connecting Minority Communities Pilot Program (CMC) grant recipients may submit a No-Cost Extension AAR no later than 90 calendar days before the end of their award period.

CMC recipients who plan to submit a No-Cost Extension AAR should note that they are encouraged to do so no sooner than six months before the award end date. For example, a

CMC recipient with a period of performance end date of October 14, 2024, should submit the No-Cost Extension AAR within the window of April 14, 2024 (six months prior to the award period end date) to July 14, 2024 (90-calendar-day deadline). Recipients should contact their assigned FPO for any additional questions regarding the submission timeline for a No-Cost Extension AAR.

According to the Enabling Middle Mile Broadband Infrastructure Program (Middle Mile) Recipient Handbook, Middle Mile grant recipients may submit a No-Cost Extension AAR no later than 30 calendar days before the end of the award period to be granted a one-time extension to the expiration date of the award for up to 12 months.

**Q: What budget changes require a Budget Revision AAR? What changes would not require a Budget Revision AAR?**

A: Below are some examples of budget changes that do require and do not require a Budget Revision AAR.

Budget changes that **do require** a Budget Revision AAR:

- A Budget Revision AAR is required if the federal share of the project exceeds the Simplified Acquisition Threshold (SAT), currently \$250,000.00, and the cumulative amount of the budget transfer between direct cost categories exceeds 10% of the total awarded budget (see 2 CFR § 200.308(f)). For example, if travel costs included in the awarded (or last approved) budget increased by more than 10% of the total budget, then a Budget Revision AAR is required.
- A Budget Revision AAR is required if the recipient desires to create, spend, or transfer any amount of funds into a new cost category (see 2 CFR § 200.308(f)). For example, if the grant recipient no longer needs the funds previously budgeted for travel and legal costs, and the grant recipient would like to transfer those funds to a new cost category not previously included in the previously approved budget, then a Budget Revision AAR is required.
- A Budget Revision AAR is required if a recipient desires to transfer any amount of funds between indirect and direct cost categories (see 2 CFR § 200.308(f)).

Budget Changes that **do not require** a Budget Revision AAR:

- A Budget Revision AAR may not be required if the requested transfer is between existing direct cost categories and the aggregate of all transfers is less than 10% of the total last approved budget by the Grants Officer ([NIST Financial Assistance Reference Guide](#)).

In all cases, Grant recipients should consult with their assigned FPO for further guidance on whether the proposed change to their budget requires a Budget Revision AAR.

**Q: Is a Budget Revision AAR required in order to move funds between existing cost categories?**

A: In cases where the change is less than or equal to 10% of the total last approved budget or the total federal commitment for the award is less than the SAT, moving funds between previously approved direct cost categories will not require a Budget Revision AAR. A Budget Revision AAR is required if the federal award share exceeds the SAT, and the transfer of funds among direct cost categories exceeds 10% of the total last approved budget. A Budget Revision AAR is also required if a recipient desires to transfer any amount of funds between indirect and direct cost categories (see 2 CFR § 200.308(f)).

**Q: Can grant recipients request a budget revision to obtain additional federal funds?**

A: Grant recipients may not request additional funds through a Budget Revision AAR. A Budget Revision AAR allows a grant recipient to amend their approved project budget but does not add funds to the original award amount.

**Q: Is it acceptable for grant recipients to move funds into a new cost category?**

A: If the transfer of funds creates a new cost category not included in the previously approved budget (no matter the amount), then a Budget Revision AAR is required. These regulations apply irrespective of the budget item being amended.

For example, if a grant recipient would like to add a new personnel category for a position that was not in the previously approved budget, a Budget Revision AAR is required. Grant recipients are encouraged to consult with their assigned FPO in advance to confirm whether an AAR is required.

**Q: How do grant recipients report changes between budget categories if the change is less than 10% of the total awarded budget?**

A: Grant recipients should inform their assigned FPO and Grants Specialist (GS) of intended alterations to their award before making changes.

Budget modifications of less than 10% of the total award amount and between direct cost categories funded in the previously approved budget do not require a formal budget revision. However, any changes to the budget should be reported directly to the FPO via email and must be reflected in financial and performance (technical) reports.

**Q: Is there a limit on the number of AARs that a grant recipient may submit during the period of performance for their grant?**

A: While there is no limit to the number of AARs that may be submitted, grant recipients requesting a change to their award should always begin by consulting with their assigned FPO. NTIA and NIST support grant recipients through the life of their award and will work with grant recipients to find the most effective solutions to any issue that may arise. While it is preferred that grant recipients complete their project with limited changes, there may

be situations where an AAR is unavoidable. If possible, grant recipients should combine all AARs into a single submission.

**Q: Are budget revisions necessary for changes to the indirect cost, personnel, or fringe benefits categories? Alternatively, are budget revisions only mandatory for changes in direct cost categories?**

A: A Budget Revision AAR is required if a recipient makes changes (of any amount) to an indirect cost category. Grant recipients may negotiate indirect costs with the federal awarding agency, which will require a cost allocation plan (see 2 CFR § 200.414(e)). When transferring funds to the indirect cost category, grant recipients should be cognizant of their program's maximum indirect cost rate and ensure that they do not exceed this amount.

**Q: Is a budget modification needed if a grant recipient exceeds a budget subcategory, but not the overall cost category? For example, what if the grant recipient exceeded the fiber line item included in the budget's Equipment cost category, but did not exceed the cost category itself?**

A: A Budget Revision AAR is required if the federal share of the project exceeds the SAT and the transfer of funds among direct cost categories exceeds 10% of the total budget, or when funds are transferred to a new cost category not included in the previously approved budget. If the federal share of the project exceeds the SAT and the transfer of funds among direct cost categories does not exceed 10% of the total budget, a Budget Revision AAR is not required. In the above example, the grant recipient remained within their originally budgeted amount for the Equipment cost category, so a Budget Revision AAR would not be necessary.

**Q: If the Authorized Organizational Representative (AOR) goes on a prolonged leave of absence, does the grant recipient need to submit a Change in Key Personnel AAR during the leave?**

A: The Change in Key Personnel AAR requirements related to AORs differ for construction projects and non-construction projects.

**Non-Construction Projects:**

- Grant recipients with non-construction projects must submit a Budget Revision AAR if the AOR's leave of absence results in a 25% reduction of time devoted to the project or exceeds three months (see 2 CFR § 200.308(c)(3)).
- If the grant recipient is replacing the AOR permanently, non-construction projects must submit a Change of Key Personnel AAR (see 2 CFR § 200.308(c)(2)).

**Construction Projects:**

- Grant recipients with construction projects should inform their assigned FPO and Grant Specialist (GS) as far in advance of the AOR's planned absence as possible.



Grant recipients should also provide the contact information for the acting or temporary AOR to their assigned FPO and GS.

- If the grant recipient is replacing the AOR permanently, construction projects should inform their assigned FPO of the AOR's departure and the information of the AOR replacement. NIST recommends construction projects follow NIST protocols by submitting a Change in Key Personnel AAR as well.

**Q: Which project personnel are authorized to submit an AAR?**

A: The AOR is the only personnel authorized to submit an AAR.

**Q: If a grant recipient hires a project manager who was not included in the original application, should the grant recipient submit a Change in Key Personnel AAR?**

A: Any change in key personnel for non-construction projects requires prior approval from the Grants Office. Construction projects may change key personnel without an AAR so long as the costs for the new personnel do not require prior approval as outlined in 2 CFR § 200.407. However, NIST recommends construction projects follow NIST protocols by submitting a Change in Key Personnel AAR as well.

For all recipients (construction or non-construction), if the change or addition in new personnel requires a transfer of funds that exceed the cumulative threshold of 10% of the total budget, then a Budget Revision AAR is also required.

Grant recipients should consult the terms of 2 CFR § 200.308(f) and speak with their assigned FPO and GS to determine whether certain conditions are present that would require an AAR.

**Q: Is a Change in Key Personnel AAR required if a staff member who is not the AOR leaves the project?**

A: Key grant administration changes that constitute a Change in Key Personnel AAR include personnel named in the original project application or executed CD-450 and members of the grant recipient organization that, if removed, would cause a significant impact to the project. For example, for non-construction projects, any change in the principal investigator, chief financial officer, or technical personnel listed on the CD-450 would require a Change in Key Personnel AAR. NIST recommends construction projects follow NIST protocols by submitting a Change in Key Personnel AAR as well.