Recipient Revision Request Guidance

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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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CONTENTS

NOTE:	4
Version Control	4
Document Review/Approval History	4
1. Introduction	5
1.1. How to Use This Guide	5
1.2. Resources and Requirements	6
1.3. What is a Revision Request?	6
1.4. Revision Request Roles	7
1.5. Revision Request Timeline	7
1.6. Best Practices Checklist	8
1.7. Revision Request Submission in eRA	9
2. Budget Revision	11
2.1. Determining If a Budget Revision is Required	12
2.2. Budget Revision Documentation	12
2.3. Example: 10% Rule Calculation Within SF-424A	14
2.4. Example: 10% Rule Calculation Within SF-424C	15
2.5. Additional Budget Revision Trigger Examples	17
3. Change in Key Personnel	20
3.1. Change in Key Personnel Examples	20
3.2. Removing Personnel	21
3.3. Change in Key Personnel Process	22
3.4. Change in Key Personnel Documentation	22

4	. Change in Scope	. 24
	4.1. Change in Scope Examples	. 24
	4.2. Change in Scope Documentation	. 25
5	. Subaward, Transfer, Contract Out Work	27
	5.1. Subaward, Transfer, or Contract Out Work Examples	. 28
	5.2. Subaward, Transfer, or Contract Out Work Documentation	. 28



NOTE:

This document is intended solely to assist recipients in better understanding Tribal Broadband Connectivity Program and the requirements set forth in the Notice of Funding Opportunity (NOFO) for this program. This document does not and is not intended to supersede, modify, or otherwise alter applicable statutory or regulatory requirements, the terms and conditions of the award, or the specific application requirements set forth in the NOFO. In all cases, statutory and regulatory mandates, the terms and conditions of the award, the requirements set forth in the NOFO, and follow-on policies and guidance, shall prevail over any inconsistencies contained in this document.

VERSION CONTROL

Date	Version	Version Name	Description
08/17/2023	1.0	TBCP NOAA	Reflected Grants Online
06/1//2023	1.0	Recipient AAR Guide	processes
		TBCP NOAA	Updated to reflect eRA
07/16/2024	2.0	Recipient RR	Commons
		Guidance	Commons
		TBCP NOAA	Undated template and added
6/5/2025	2.1	Recipient RR	Updated template and added TBCP II links
		Guidance	I DCF II IIIIKS

DOCUMENT REVIEW/APPROVAL HISTORY

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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) <u>eRA</u>

<u>Commons</u> system. The following guidance is specifically for Tribal Broadband Connectivity Program (TBCP) recipients awarded under the <u>first</u> and <u>second</u> Notice of Funding Opportunities (NOFOs), 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. HOW TO USE THIS GUIDE

When submitting an RR request:

- First, review <u>Section 1</u> 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 1.6.



4. Submit the RR in eRA Commons using the instructions in Section 1.7.

Note that guidance for No Cost Extension RRs is available separately on the <u>BroadbandUSA website</u>.

1.2. RESOURCES AND REQUIREMENTS

Recipients should ensure all RRs comply with:

- Current Standard and Specific Award Conditions (SACs)
- Regulations outlined in 2 CFR Part 200
- TBCP I: <u>DOC Financial Assistance Standard Terms and Conditions</u> (dated 11/12/2020)
- TBCP II: <u>DOC Financial Assistance General Terms and</u> Conditions (dated 10/1/2024)
- TBCP I: NOFO 1
- TBCP II: NOFO 2
- eRA Commons User Guides

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

1.3. 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.



1.4. 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.

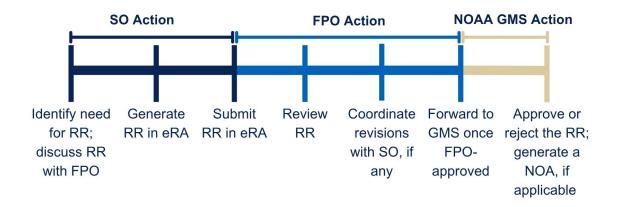


1.5. REVISION REQUEST TIMELINE

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).

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.





1.6. BEST PRACTICES CHECKLIST

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



1.7. 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.
- 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 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

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 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!

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.

 $^{^1}$ 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 General Terms and Conditions.

eRA Field	Required Documentation	
Description	Description containing:Effective date for the budget revision	
Justification Document	 Budget Narrative explaining the proposed funds transfer. 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. 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. 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:	



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
 - o \$331,500 x .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.

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 x .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.

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



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]
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.

	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 Administrati on (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



Example	Example Reason for Change	Action	Explanation
			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

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 Authorized Organization Representative (AOR), PI/PD, chief financial officer, or technical personnel listed on the Notice of Award (NoA) 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, <u>unless</u> the key personnel is a PI/PD on a Use & Adoption project.

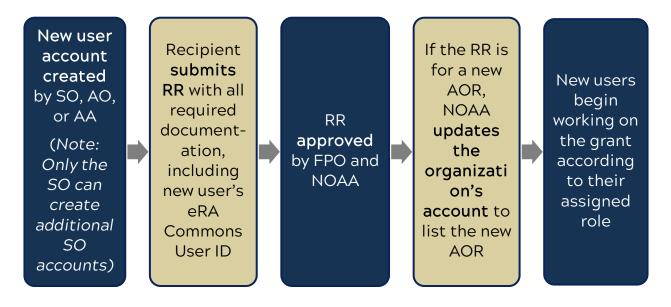
Per 2 CFR § 200.308(c)(3), prior approval is required if a PI/PD disengages from a non-construction project for more than three months, or there is a 25% reduction in their time devoted to the project. In this situation, recipients must submit a **Disengagement** for More than 3 Months, or 25% Reduction 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.

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 <u>Account Management Module (AMM) User Guide</u>.



3.3. CHANGE IN KEY PERSONNEL PROCESS



Recipients should refer to the <u>eRA Commons User Guide</u> for stepby-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: Name and title of new personnel Effective date for the change in personnel
Justification Document	 Letter on Tribal letterhead signed by the AOR containing: 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



eRA Field	Required Documentation
Justification	Resume or Curriculum Vitae (CV) for the proposed new
Document	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

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:
	Effective date for the change in scope
Justification	Letter on Tribal letterhead signed by the AOR
Document	containing:
	 Justification for the change in scope
Justification	Revised Project Narrative
Document	
Budget	If a budget change is required: Revised Budget Narrative
Documentation	
Budget	If a budget change is required: SF-424 A or C budget
Documentation	form that shows the total funding for the award.
	SF-424C: Infrastructure Deployment and Planning
	projects
	SF-424A: Use and Adoption projects



eRA Field	Required Documentation
Other Supporting Documentation	Substantial changes in scope may require additional supporting documentation, including but not limited to: • Contract documents • Cost estimates • Amendments • Maps Work with your FPO to determine if additional
	documentation is needed.



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 General Terms and Conditions³ (.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 <u>without</u> a Subaward, Transfer, or Contract Out Work RR.

³ TBCP I: https://www.commerce.gov/sites/default/files/2020-

^{11/}DOC%20Standard%20Terms%20and%20Conditions%20-

^{%2012%20}November%202020%20PDF_0.pdf

TBCP II: https://www.commerce.gov/sites/default/files/2024-

^{09/}DOC%20Financial%20Assistance%20General%20Terms%20and%20Conditions%20as%20of

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:Effective date for the subaward or contract out work
Justification Document	 Justification on Tribal letterhead containing: 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 non-competitively, you must also include justification for that decision.
Budget Document	Budget for each subaward or contractor

