



Award Action Request (AAR) and Unfunded Grant Action (UGA) Guidance

This document is intended solely to assist recipients in better understanding Office of Internet Connectivity and Growth (OICG) grant programs and the requirements set forth in the Notices of Funding Opportunity (NOFOs) for the respective OICG programs. 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 program NOFOs. In all cases, statutory and regulatory mandates, the terms and conditions of the award, the requirements set forth in the NOFOs, and follow-on policies and guidance, shall prevail over any inconsistencies contained in this document.



AAR and UGA Guidance

The National Telecommunications and Information Administration (NTIA) offers this resource to grant recipients to provide guidance on Award Action Requests and Unfunded Grant Actions. For more information or program-specific requirements, please contact your Federal Program Officer (FPO).



DEFINITIONS

- An **Award Action Request (AAR)** is the mechanism used by a grant recipient to propose a change to their award in response to an event that occurs after the award has been made. An AAR may be used to amend an aspect (e.g., budget, scope, key personnel, etc.) of an approved award, with the exception of the award amount.
- An **Unfunded Grant Action (UGA)** is the mechanism used *in response to an AAR* when the awarding agency recommends approval to amend an aspect (e.g., budget, scope, key personnel, etc.) of an approved award, with the exception of the award amount.



COMPLIANCE AND REQUIREMENTS

Recipients must ensure all changes to the award comply with:

- ✓ [Department of Commerce Financial Assistance General Terms and Conditions](#) and Specific Award Conditions (SACs) of the applicable program
- ✓ Current NOFO, policy notice, or other applicable program guidance
- ✓ Regulations outlined in the version of 2 CFR 200 (Uniform Guidance) applicable to the program



COMMON TYPES OF AARS

Table 1 lists a few common types of AARs. This list is not exhaustive. Contact your FPO for specific types, descriptions, and requirements by grant program.

Table 1: Common Types of AARs

Type	Description
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.
Change in Key Personnel	A change to the grant recipient's key grant administration personnel specified in the application or award agreement.
Change in Scope	A change in the specific direction, goals, objectives, purposes, or project areas of the approved project.
No-cost Extension	An amendment that extends a project's period of performance without granting additional funds.
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.

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AAR AND UGA ROLES

Figure 1 describes major roles in the AAR to UGA process. Regardless of who assembles the required and supporting materials, the recipient's Authorized Organization Representative (AOR) is responsible for formally submitting the AAR package as directed by their grant program.

Figure 1: UGA Roles



Authorized Organization Representative (AOR)

Recipient staff that determines who within their internal structure is responsible for gathering and compiling information for the AAR; the AOR submits the AAR package.



Federal Program Officer (FPO)

NTIA program staff who discusses proposed modifications with the AOR, provides guidance on AARs, conducts initial review, and coordinates any revisions.



Grants Officer/Grants Specialist

National Institutes of Standards and Technology (NIST) staff who reviews submitted AARs, coordinates with FPOs on required revisions, approves or rejects AARs, and sends Award Amendment or Approval Letter if approved.



AAR TO UGA PROCESS

Table 2 shows the steps the recipient, the FPO, and the Grants Office at NIST take to process an AAR into a UGA.

Table 2: AAR to UGA Process

Step	Action
1	The recipient prepares the AAR package with FPO support.
2	The recipient's AOR submits the AAR package. The submission process may vary by action type. Recipients should consult their FPO for submission instructions.
3	If not approved, the Grants Office notifies the recipient to request additional information or provide the reason for the decision.
4	If approved, the AAR becomes a UGA. The Grants Office notifies the recipient of approval via an Approval Letter or an Award Amendment.
5	If UGA approval is formalized via an Award Amendment rather than an Approval Letter, the recipient's AOR signs and returns the Award Amendment.

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CHECKLIST

Recipients should use the checklist in **Table 3** to ensure timely and complete AAR submission and reduce the need for revisions.

Table 3: AAR Submission Checklist

✓	Before AAR Submission
<input type="checkbox"/>	Notify your FPO in advance of a potential AAR.
<input type="checkbox"/>	Ensure all necessary documents have been gathered and attached.
<input type="checkbox"/>	Review all submissions for typos and errors.
<input type="checkbox"/>	Ensure that financial numbers and project information match across all documents, if applicable.
<input type="checkbox"/>	Ensure that budget information matches the information in the approved SF-424A, SF-424C, or other budget documents.
✓	During AAR Submission
<input type="checkbox"/>	Submit the AAR package as soon as possible to allow sufficient time for processing.
<input type="checkbox"/>	Ensure the AAR package includes all required information.
<input type="checkbox"/>	Submit the AAR package via email to UGAM@nist.gov with the FPO copied.
✓	After AAR Submission
<input type="checkbox"/>	Monitor correspondence from the Grants Office or the FPO that may include requests for further information or the approval letter and/or award amendment.
<input type="checkbox"/>	Store documentation in the grant file in compliance with records retention and audit requirements.



ADDITIONAL QUESTIONS?

Some types of AARs, process steps, and documentation may differ by grant program. For additional questions related to AARs and UGAs please contact your FPO.