Advance Budget Number Eligibility Primer

This primer explains the areas that are reviewed by the Office of Sponsored Programs at time a request for advance budget number eligibility is received. Each area corresponds to a set of regulations or sponsor rules that impact sponsored projects. OSP encourages all Principal Investigators and their staff to be aware of the regulatory areas and sponsor requirements that may impact eligibility before using the Advance Budget Number Eligibility Tool.

**PRE-AWARD SPENDING AUTHORITY**

Does the Sponsor allow 90 day pre-award spending authority?

Federal assistance funding is usually under expanded authorities. Expanded authorities allows a grantee/applicant to undertake some actions without sponsor pre-approval. One of these actions is to incur pre-award costs (e.g. costs within 90 days ahead of the anticipated start date). These pre-award costs, if allowable, will be reimbursed by the federal sponsor.

Pre-award costs incurred outside the 90 day pre-award spending timeframe, or in anticipation of an award not under expanded authorities, run a high risk of not being reimbursed by the sponsor unless sponsor pre-approval is obtained, allowing such costs to be incurred before the awarded period.

A department may assess this risk and agree to cover costs that are later not allowed by a sponsor. The department can do so by providing an alternative department non-federal budget number within the Advance Budget Number Eligibility Tool. By including such budget number, the requestor is assuring that he/she has departmental permission to use such budget number for this purpose.

**FEDERAL E-VERIFY REQUIREMENT FOR FEDERAL CONTRACTS AND FEDERAL CONTRACT FLOW-THROUGH FUNDS**

Is the anticipated award a federal contract at or exceeding $100,000 total value or a subcontract to UW, that will exceed $3000 or more of federal contract flow-through funds?

Do you anticipate charging personnel costs to the advance budget number?

Have all personnel to be charged to the contract been checked against the E-verify system?

Federal contracts or subcontracts awarding federal contract flow-through funding exceeding a specific dollar threshold require, by their terms and conditions, that all personnel performing under the contract be checked against the federal E-verify list, in order to ensure the individual’s eligibility to work within the United States. This verification must be undertaken by the department (e.g. payroll coordinator) before the personnel begin any activity that will be charged to the contract.
HUMAN SUBJECTS RESEARCH
Will human subjects research expenditures be charged to the advance budget number?

Did the PI answer “Yes” to the Compliance Question HS-1, “Does this application involve the use of human subjects?”

Do you have a pending IRB application, IRB approval, or an Exempt Status Determination?

Federal or federal flow-through funding is subject to the Federal Common Rule at 45 CFR Part 46 and in some cases, the Food and Drug Administration regulations under 21 CFR Part 50. These regulations require that all human subjects research activity that does not qualify for an exemption be carried out under an approved protocol reviewed by the IRB. Charges in support of human subjects research activity supported by federal funding cannot be incurred without such approval.

At times, an eGC1 and associated proposal may indicate there will be human subjects research activity at some point on the project but definitive plans for human subjects involvement cannot be described in the grant application. These limited circumstances are described in 45 CFR 46.118.

In order for OSP to allow an advance budget number in these limited circumstances, the PI must provide a written assurance to OSP that “My project qualifies as delayed human subjects research as that is defined in 45 CFR 46.118. Human subjects research activity expenditures will not occur in advance of funding and prior to IRB approval”. Such written assurance should accompany the Advance Budget Number Eligibility request as an attachment.

Finally, there are situations in which an eGC1 and associated proposal indicate there will be human subjects research activity which is described in the proposal, but it is a multi-year project, and human subjects activity will not begin until Year 2 or later. If that is the case, you will need to provide written assurance to OSP that “No human subjects research activity expenditures will occur in advance of funding and prior to IRB approval”.

VERTEBRATE ANIMAL USE
Will vertebrate animal use expenditures be charged to the advance budget number?

The eGC1 contains compliance questions. Did the PI answer “Yes” to the Compliance Question AC-1, “Does this application involve the use of vertebrate animals?”

All sponsored funding is subject to federal animal welfare regulations found at 9 CFR Parts 1 and 2. These regulations state that all animal use activity be carried out under an approved protocol reviewed by an Institutional Animal Care and Use Committee (IACUC). Charges in support of animal use cannot be incurred without such approval.
At times, an eGC1 and associated proposal may indicate there will be animal use research activity at some point on the project, such as the second or third year of a multi-year project. In order for OSP to evaluate the allowability of an advance budget number, the PI needs to provide written assurance to OSP that “Animal use activity expenditures will not occur in advance of funding and prior to IACUC approval”. Such written assurance should accompany the Advance Budget Number Eligibility request as an attachment. OSP may consult with the UW Office of Animal Welfare (OAW) to determine allowability on a case by case basis.

SIGNIFICANT FINANCIAL INTEREST

As of August 24, 2012, all personnel that rise to the level of an “Investigator”, as that term is defined in Grants Information Memoranda (GIM) 10, must complete a disclosure. The disclosure must be either that: a) they do not have SFI to disclose or; b) they have SFI to disclose and provide details of that SFI. All disclosures are made within the University Financial Interest Disclosure System (FIDS).

An advance budget number does not have any outstanding SFI compliance issue when any one of the following Primary Disclosures statuses are in place for all Investigators listed on the PI & Personnel page of the eGC1:

- Review Complete, SFI not related;
- No Review Required;
- Review Complete FCOI not found; - OR -
- Review Complete, FCOI management plan in place

Personnel that are not designated “yes” or “no” as to whether an Investigator, Investigators that have not made a Primary disclosure, or a Primary disclosure with a pending SFI review represent an outstanding compliance issue that needs resolution prior to allowing eligibility. Additionally, PHS-funded investigators must have current PHS FCOI training.

It is recommended that the eGC1 PI&Personnel page be checked prior to requesting advance budget number eligibility.

General information around SFI compliance requirements and the Financial Interest Disclosure system is found at: http://www.washington.edu/research/tools/fids/support

Last updated 6.17.2015