



Obtaining Prior Approval: When, Why, and How



The MIECHV program requires awardees to obtain prior approval from HRSA for certain types of activities and spending. These requirements are outlined in the [Code of Federal Regulations \(CFR\), Title 45: Public Welfare, Part 75—Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards](#).

Prior approval requirements typically fall into three categories: who is doing the work, how the funds will be spent, and scope.

Who Is Doing the Work

Prior approval is generally required in these three areas:

- **Change in program director:** HRSA cares who is at the helm. Typically, prior approval must be requested when the project director withdraws from a project entirely, will be absent for three months or longer, or reduces time devoted to the project by 25 percent or more from the level approved at the time of the award.
- **Addition of a new partner:** HRSA also cares about who is contributing to the work. If awardees plan to use another organization to help meet their award objectives, prior approval is required.

[Visit the MIECHV Program website to learn more!](#)

- **Changes in organizational status:** These include changes to your organization's name or an organizational merger.

How Funds Will Be Spent

Prior approval is typically required for the following areas:

- **Changes to the award budget or program plans:** For MIECHV programs, re-budgeting requests must be submitted when revisions include:
 - Cumulative transfers among budget categories that exceed 25 percent of the total approved budget;
 - Moving funds into a budget category that did not previously include funding; and/or
 - Completely eliminating funding from a budget category.
- **Purchase of general-purpose equipment:** Typically, award funds are not directly used to purchase general-purpose equipment such as office equipment, information technology equipment, or motor vehicles. Should you decide to use award funds for these types of purchases, notify HRSA immediately to obtain prior approval.

Scope

Prior approval is required for any change in the scope of a program or project, including a change in the objectives, aims, or purposes identified in the approved application; a change in the service area; adding or terminating a contract; eliminating a service delivery site; or budget changes that substantially alter the project from what was approved. Awardees must coordinate with their project officer to ensure that any changes or newly proposed activities are in alignment with the MIECHV program.

Tips for Meeting Prior Approval Requirements

- ✓ **Start by checking in with your GMS and/or PO.** They can help you determine whether prior approval is needed for a given change/expense and what types of documentation will be required.
- ✓ **Request written approval from the authorized HRSA official.** Make sure you know who is officially authorized to provide prior approval and whom you should go to for sign-off. This is typically coordinated by your GMS, though the process may begin with your PO.
- ✓ **Document when you asked, whom you asked, and their response.** While HRSA does not require awardees to submit this information, you may want to keep these communications on file for your internal records. HRSA will confirm the information with you, as needed.
- ✓ **Establish a process (policies and procedures) for how and when subrecipients should obtain prior approval.** Subrecipients must request written prior approval from awardees (as pass-through entities). Awardees will then act as the funding agency by reviewing and approving/disapproving these requests. Take time in advance to communicate this process; doing so will help you (and them) avoid the risk of expensive cost disallowance.
- ✓ **Know when prior written approval from HRSA is required to approve a subrecipient's request.** For example, prior written approval is required if the subrecipient request is inconsistent with the purpose or terms and conditions of the federal award, or if the revision will result in a change to the recipient's approved project that requires prior federal approval.

Resources

[Code of Federal Regulations, Title 45: Public Welfare, Part 75—Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards](#)

This document contains the regulations for grant management for the Department of Health and Human Services. [Subsection 75.407](#) spells out twenty-six requirements for prior written approval.

[HHS Grants Policy Statement](#)

This online document describes the general terms and conditions of HHS grant awards.

[HRSA Financial Management Page](#)

This website is designed to help HRSA recipients, including MIECHV awardees, understand and meet the financial requirements of their federal awards.

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