University Prior Approval System (UPAS)

Section I: Purpose

The UPAS form is Villanova's system for granting prior approval and confirming responsibility for costs incurred under advance accounts, as well as documenting the scientific necessity for pre-award costs, no cost extensions and unbudgeted foreign travel or equipment. ORA’s signature represents institutional approval for these actions:

Advance Account Request
- Issued when there is evidence that a grant will be funded but the formal award documentation has not yet been received.
- Allows you to charge project expenses in a grant account. This promotes accuracy in the effort certification process, relieves the departmental account and eliminates the need for cost transfers.
- Costs are incurred at signatories' risk should the award not materialize.
- In cases where you require authorization for advance account spending on a continuation year where the grant number will not change, ORA will provide approval but the General Ledger will not be updated to reflect the new end date until a formal extension is received. UPAS approval will allow you to continue charging salaries and ordering supplies.
- There are certain restrictions associated with advance accounts:
  - Expenses may not exceed 25% of the anticipated award.
  - Capital purchases and the hiring of new personnel (except students) are not allowed.
  - All approvals must be renewed after 90 days.

Pre-award Costs Request
- Allows you to incur project costs up to 90 days prior to the start date where permitted under sponsor guidelines.
- Requests to incur pre-award costs generally require a simultaneous request for an advance account.
- Must contain an explanation as to why pre-award costs are necessary for the conduct of the project.
- Authorization for pre-award costs must be obtained prior to incurring the expense - not after the fact.

No-Cost Extension (NCE) Request
- Allows you to request a one-time no cost extension on grants that are covered under “expanded authorities”. Subsequent NCE’s or requests for NCE’s on grants that require prior approval should be requested in a formal letter to the sponsor which is countersigned by the Director of ORA.

Rebudgeting Request
- Allows you to request approval to rebudget funds in order to incur expenses for equipment or foreign travel in cases where they have not been specifically budgeted in the original proposal.
- Do not incur expenses until you have prior approval or expenses will be disallowed.
Section II: Procedure

All requests
- Complete the PI, sponsor and account information at the top of the form.

Advance Account Request
- There must be a pending application on file in ORA, if not:
  - Create a Cayuse SP record.
- Fill in the Expected Start Date and the Expected Award Amount on the UPAS form
- Select which type of advance account you are requesting (new, extension, continuation).
- Complete justification for the advance account.
  - Formal award notice has not been received but sponsor has indicated in writing that the award will be funded.
- Continuation of current award, new award notice is expected.
- Attach recent documentation of the sponsor’s intent to issue an award to Villanova.
- Fill in guarantee account number.
  - This is the Villanova index that will absorb the costs if the grant funding does not materialize.
  - This account must be a non-grant index that must contain sufficient funds.
  - For non-grant accounts, College approval is required before submitting the request to ORA.
- Obtain appropriate signatures
  - PI
  - College
- Forward the completed UPAS to ORA for review/approval.

Pre-award Costs Request
- Complete the pre-award cost effective date on the UPAS form.
- Attach Notice of Award from Sponsor along with any rules and regulations regarding the criteria for pre-award costs approval.
- Complete justification for pre-award costs.
- Fill in guarantee account number.
  - This is the TJU charge code that will absorb the expenses if the pre-award costs are denied by the sponsor.
  - This must be a non-grant index with sufficient funds.
  - For any non-grant index, College approval is required before submitting the request to ORA.
- Obtain appropriate signatures.
  - PI
  - College approval is required if the guarantee account is a college account.
- Forward the completed UPAS to ORA for review/approval.
No-Cost Extension

- Enter the date that you are requesting the extension through.
- Complete the justification for the extension in terms of the completion of the proposed scope of work (For example, which specific aim was not completed?). The availability of residual funds is not in itself a legitimate basis for an extension. Indicate whether subawards will also be extended; ORA will then issue a subaward amendment.
- Address the significant reduction of effort (SRE) question. (Note: SRE generally requires the submission of a formal prior approval letter. However, only during the NCE process, ORA will e-mail the effort information to the funding agency. Many times, the agency considers that sufficient; other times, they will ask for the formal request.)
- Consider if sufficient funds will be available during the NCE. If the NCE will result in cost sharing, a specific dollar amount and source of funds must be identified.
- Obtain the appropriate signatures
  - PI
  - College signatures are required only if there is cost sharing approval being requested.
- Forward the completed UPAS to ORA for review/approval.

Rebudgeting

- Enter the amount of the rebudgeting request, indicating what budget categories you are moving funds between. Example: $2,000 from “6408” (lab supplies) to “7106” (foreign travel.)
- Complete the justification for the rebudgeting in terms of the relevance and benefit to the aims of the project. Consider why the funds are available in the category from which they are being moved.
- Obtain PI signature.
- Forward the completed UPAS to ORA for review/approval.