



Prior Approval Requirements for EDA Awards

Understanding when Recipients must request written approval before changing an approved award

Recipients should discuss all proposed changes with their EDA contact prior to submitting an AMR.

Skipping this step can delay review or put award funding at risk.

Overview

Recipients are required to report deviations from the approved award budget and request prior written approval from EDA for certain costs in accordance with [2 CFR § 200.308](#) (Revision of budget and program plans) and [2 CFR § 200.407](#) (Prior written approval), respectively.

To comply with these requirements, the Recipient must submit an Award Modification Request (AMR) through EDGE, EDA's Grant Management System and the official record for post-award actions.

Initial consultation with EDA will enable staff to help you determine:

- whether the request is allowable under the award terms
- whether the AMR should be categorized as an Amendment or Administrative Approval
- documentation required for EDA to initiate review
- the level of detail necessary to include in the justification for the AMR, and
- approximate duration of EDA review and approval once documentation requirements are met

AMRs in EDGE are categorized as either **Administrative Approvals** or **Amendments** depending on whether Grants Officer approval is necessary. Grants Officer approval may result in updates to the award terms and an updated Notice of Award that serves to document the change, in addition to any other revised documentation necessary to update the Award Package. Updated documentation must be reviewed and approved by the Recipient's Authorized Representative prior to taking effect and will govern the implementation of award activities unless superseded by a subsequent AMR.

The following tables outline documentation requirements for AMRs.

Administrative Approvals

AMR Type	Documentation Required from Recipient
Budget Revision (if cumulative changes total ≤10% of the project budget)	– SF-424A – Updated budget narrative
Key Personnel Change	– Written justification – Updated budget narrative with staffing plan – Resume(s) of new personnel – Certificate(s) affirming that key personnel have completed Waste, Fraud, and Abuse training

Amendments	
AMR Type	Documentation Required from Recipient
Budget Revision (if cumulative changes total >10% of the project budget)	– SF-424A – Narrative documenting the Original Budget vs Requested Changes – Written justification detailing the need for the change(s)
No-Cost Time Extension	– Written justification – SF-424A – Updated budget narrative demonstrating the use of remaining funds
Recipient Change (or Addition of Co-Recipient)	Lead Recipient: – Formal letter from lead recipient Authorized Representative (AR) justifying recipient change or addition of co-recipient New Recipient or Co-Applicant: – SF-424 – SF-424A – CD-511 – SF-LLL (if applicable) – SAM registration – Certificate of Good Standing (Non-Profit) – Articles of Incorporation (Non-Profit) – Bylaws (Non-Profit) – Budget Narrative & Staffing Plan
Scope of Work Change	– Updated scope of work – Written justification detailing the need for the change <i>If the change will impact the authorized budget:</i> – SF-424A – Updated budget narrative
Subaward or Contract Addition or Removal	– Written justification for proposed change – SF-424A (if applicable) – Updated budget narrative <i>Subaward documentation:</i> – UEI – Certificate of Good Standing (Non-Profit) – Articles of Incorporation (Non-Profit) – Bylaws (Non-Profit)

Still unsure whether your change needs prior approval?

Discuss the proposed change with your EDA Project Officer before submitting an AMR in EDGE, and review [2 CFR § 200.407](#) for the full prior-approval requirements.