



**HRSA**  
**Healthy**  
**Grants**  
**WORKSHOP**  
Presented as a Web Series

**HRSA**  
Health Resources & Services Administration

# Best Practices for Prior Approvals

## HRSA Healthy Grants Workshop

*May 14, 2025 (Updated September 30, 2025)*

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Office of Federal Assistance and Acquisition Management (OFAAM)

**Vision: Healthy Communities, Healthy People**



# Agenda

- **What is a Prior Approval Request?**
- **Types of Prior Approval Requests**
- **Expanded Authority**
- **How to Submit Requests**
- **Resources**
- **Questions?**



# What is a Prior Approval Request?



HRSA approval may be required when a recipient needs to change certain aspects of the approved application after the award is issued



Require submission in Electronic Handbooks (EHBs) Prior Approval (PA) Module



Require a 30-day response from HRSA



Recipients may not move forward until HRSA approval is received, either via Notice of Award (NoA) or an EHB email notification



# Regulations and Resources

- **2 CFR 200.308** – “Revision of budget and program plans” lists all the program or budget-related plan revisions that require prior approval from HHS
- **HHS Grants Policy Statement (GPS)** is a good resource for what documents you should include with your request
- Check the program legislation, Notice of Funding Opportunity (NOFO), and Notice of Award (NoA) for specifics on what changes require prior approval



# Types of Prior Approval Requests

- **Change in Key Personnel (Project Director Change)**
- **Rebudgeting (e.g. Alteration & Renovation, Transfers, etc.)**
- **Change in Scope**
- **Carryover Unobligated Balance**
- **Extension without Funds (No Cost Extension)**
- **Property Actions (e.g. Disposition, Encumbrance)**
- **Organizational Name Change (Other)**
- **Change of Recipient**
- **Approval to Draw-down funds**



# More Types of Prior Approval Requests

- Relinquishment
- Capital Update
- Extension with Funds
- Administrative Supplements
- Other

**PRIOR  
APPROVAL  
REQUIRED**

# Change in Key Personnel

- **Key personnel are those who contribute or execute the project in a meaningful way. Their absence from the project would impact the approved scope of the project.**
- **The program legislation, Notice of Funding Opportunity (NOFO), and Notice of Award (NoA) will indicate which positions are affected.**
- **Defined in 2 CFR Part 300: The individual(s) designated by the recipient to direct the project or program being supported by the grant. The PI/PD is responsible and accountable to officials of the recipient organization for the proper conduct of the project, program, or activity.**



# Change in Key Personnel

- **Changes include situations in which the current Project Director/CEO withdraws from the project entirely; is absent during any continuous period of three months or more; or reduces the time they devote to the project by 25% or more from the level that was approved at the time of award. [see : 2 CFR 200.308(f)(2) and (3)].**



# Change in Key Personnel (continued)

**Include the following in your Prior Approval Request via the EHBs:**

- Request Prior Approval as soon as possible
- Effective date of the change
- Justification for the change
- Qualifications of the proposed replacement PI/PD
- Curriculum vitae of the proposed replacement PI/PD
- Level of effort this individual will undertake
- Budgetary changes resulting from the proposed change



# Expanded Authorities

- **Waive certain prior approval requirements for some actions**
- **Notice of Award (NoA) will tell you if your program has expanded authorities and which requirements have been waived**
  - **Remarks**
  - **Terms and Conditions**



# Rebudgeting

**Rebudgeting requires a Prior Approval Request when:**

- **Funding is being moved to a previously unpopulated cost category**
- **A cost category is being completely removed from the budget**
- **Purchase of real/tangible property, including equipment**
- **Significant rebudgeting of over 25% of the total budget**



# Rebudgeting

**Unless otherwise restricted by the terms of your NoA, you may make post-award programmatic and budget revisions within and between approved budget categories up to 25% without prior approval.**



# Rebudgeting

**Include the following in your Prior Approval Request via the EHBs:**

- **Cover letter providing an explanation regarding the need for the budget revision and detailed costs**
- **Revised SF-424A or 424 R&R, and possibly the 424C**
- **Line-item budget**
- **Narrative justification**



# Carryover of Unobligated Balance

- Request to use unobligated balance in a subsequent budget period
- Should be submitted within 30 days of the submission of the Federal Financial Report
- A Carryover cannot be used for new activity that was not proposed in the original budget.



# Carryover of Unobligated Balance - Submission

**Include the following in your Prior Approval Request via the EHBs:**

- **Cover Letter which includes:**
  - The amount being carried over and brief explanation on why there is a remaining balance
  - The allowable activities and proposed timeline that the carryover, if approved, will be used for
  - Statement indicating there will be no changes to the approved award objectives, goals or purposes
- **Revised SF-424A: Budget Form**
- **Line-Item Budget Breakdown & Justification**



# Carryover or Extension Without Funds?

- How do I know which one to request?
- Is there a subsequent budget period?
  - If yes, request a carryover
  - If no, request a no-cost extension
- Ask your Grants Management Specialist if you are not sure!



# Extension Without Funds (No-cost extension)

- Request for more time to complete a project, not to exceed 12 months, submission recommended at least 60 days prior to the expiration of the project period.
- Not merely for the purpose of using an unobligated balance (2 CFR 200.308(g)(2))

## Extension Without Funds (No-cost extension) continued

*Include the following in your Prior Approval Request via the EHBs:*

- A statement about why you need the extension
- The duration of the extension (not to exceed 12 months)
- Project objectives you plan to complete during the extension period
- A detailed budget page
- A budget justification for unobligated funds you anticipate will remain at the end of the current budget period



# Change in Scope

- Any major change to the originally-approved scope of work





# Approval to Draw-down Funds

- **Specific award conditions may include, but are not limited to, the following, requiring payments as reimbursements rather than advance payments**
- **When a Federal award recipient is placed on restricted drawdown, all drawdowns of Federal funds from the Payment Management System (PMS) must have approval of HRSA's Office of Federal Assistance Management, Division of Grants Management Operations, and must comply with all applicable requirements before funds are drawn.**



# Organizational Name Change

- **Submit under Other, then Name Change**
- **Make sure you update in SAM.gov too!**



# Change in Recipient

- **Successor-in-Interest: Two organizations merge, or one organization takes over another by assuming all assets and liabilities**



# Relinquishment

- Recipient decides it is unable or unwilling to carry out the approved project and has chosen to give up the award
- Full award or part of an award



RETURN TO  
SENDER

# How to Submit a Prior Approval Request in EHB

- In HRSA's Electronic Handbooks (EHBs)
- Create New Prior Approval
- Request Type: Carryover, Project Director Change, Rebudgeting, Other etc.
- [Prior Approval Request FAQs](#)



# Steps to Create a Prior Approval Request in EHB

- Login to the EHBs (<https://grants.hrsa.gov/webexternal>) as a Grantee using [Login.gov](https://login.gov) and two-factor authentication.
- For details about logging in to the EHBs, refer to the [EHBs Login Process Overview](#) help page.

The screenshot displays the 'Applicant/Grantee' portal interface. At the top, it features the 'LOGIN.GOV' logo and a message explaining that the EHBs uses Login.gov for security, with instructions to use an existing account or create a new one. A prominent 'Login' button is visible. To the right, a 'What's New' section lists recent messages, including one dated 01/28/2022 about 'New Prior Approval (PA) and Other Submissions (EDM) Budget Forms' and another dated 10/29/2021 regarding 'Transition to Unique Entity Identifier (UEI) - October 2021 updates'. Below this, there are three main navigation columns: 'Learning' with links for Grant Program, Free Clinic Program, and FQHC-LAL Program; 'Other Links' with links for Browser Requirements, Funding Opportunities, Track Grant Application, Help, and Other EHBs Portals; and 'Contact Us' with contact information for EHBs Customer Support, including the phone number 877-464-4772, email support, and the HRSA Help Center, along with operating hours (7:00 a.m. to 8:00 p.m. ET) and a note about being closed on federal holidays.



# Steps to Create a Prior Approval Request in EHB

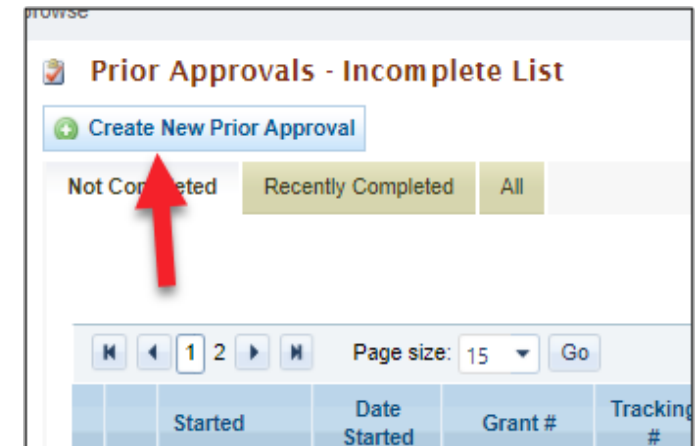
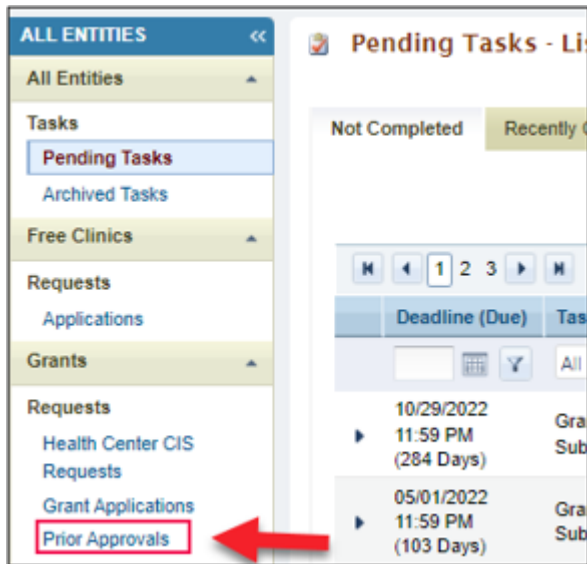
Click the **Tasks** tab from the top header options.

The screenshot shows the HRSA Electronic Handbooks user interface. At the top, there is a navigation bar with the HRSA logo and the text 'Electronic Handbooks'. Below this is a search bar and a set of navigation tabs: Home, Tasks, Organization, Grants, Free Clinics, FQHC-LALs, Dashboards, and Resource. The 'Tasks' tab is highlighted in blue, and a red arrow points to it from below. Below the navigation bar, the user is greeted with 'Welcome, Ananth Capriola'. The main content area is divided into two sections: 'My Tasks' on the left and 'Tracking' on the right. The 'My Tasks' section shows a green box with the number '45' and the text 'All', and a red box with the number '4'. The 'Tracking' section contains a table with the following data:

Category	Submitted Tasks	Submitted
<input checked="" type="checkbox"/> Other Submissions	EDM SF424 R&R Submission Name - EDM...	01/14/2022
<input checked="" type="checkbox"/> Prior Approval	Administrative Supplements	01/11/2022

# Steps to Create a Prior Approval Request in EHB

- On the **Pending Tasks - List** page, click **Prior Approvals** from the Grants section in the left navigation panel. You will land on the **Prior Approvals - Incomplete List** page.
- Click the **Create New Prior Approval** button, just below the page title. You will land on the **My Grant Portfolio-List** page



# Steps to Create a Prior Approval Request in EHB

Click **Request Prior Approval** in the **Options** column. You will land on the **Prior Approval Request - Acknowledge Documentation Review** page.

3 items in 1 page(s)

Current Budget Period	Current Project Period End Date	CRS-EIN	Grant Role	Grant Active	Last Award Issue Date	Options
	<input type="text"/> <input type="checkbox"/>	<input type="text"/> <input type="checkbox"/>	All <input type="checkbox"/>	All <input type="checkbox"/>	<input type="text"/> <input type="checkbox"/>	
02/01/2021-01/31/2022	01/31/2023	1145563766A1	Other, FRA	Yes	05/25/2021	<a href="#">Request Prior Approval</a> ▼
08/01/2021-07/31/2022	07/31/2022	1145563766A1	Other, FRA	Yes	12/14/2021	<a href="#">Request Prior Approval</a> ▼
01/01/2021-12/31/2021	12/31/2021	1145563766A1	Other, FRA	No	05/11/2021	<a href="#">Request Prior Approval</a> ▼

3 items in 1 page(s)



# Steps to Create a Prior Approval Request in EHB

Prior Approval Documentation	
Document Name	Description
HHS Grant Policy	HHS Grant Policy

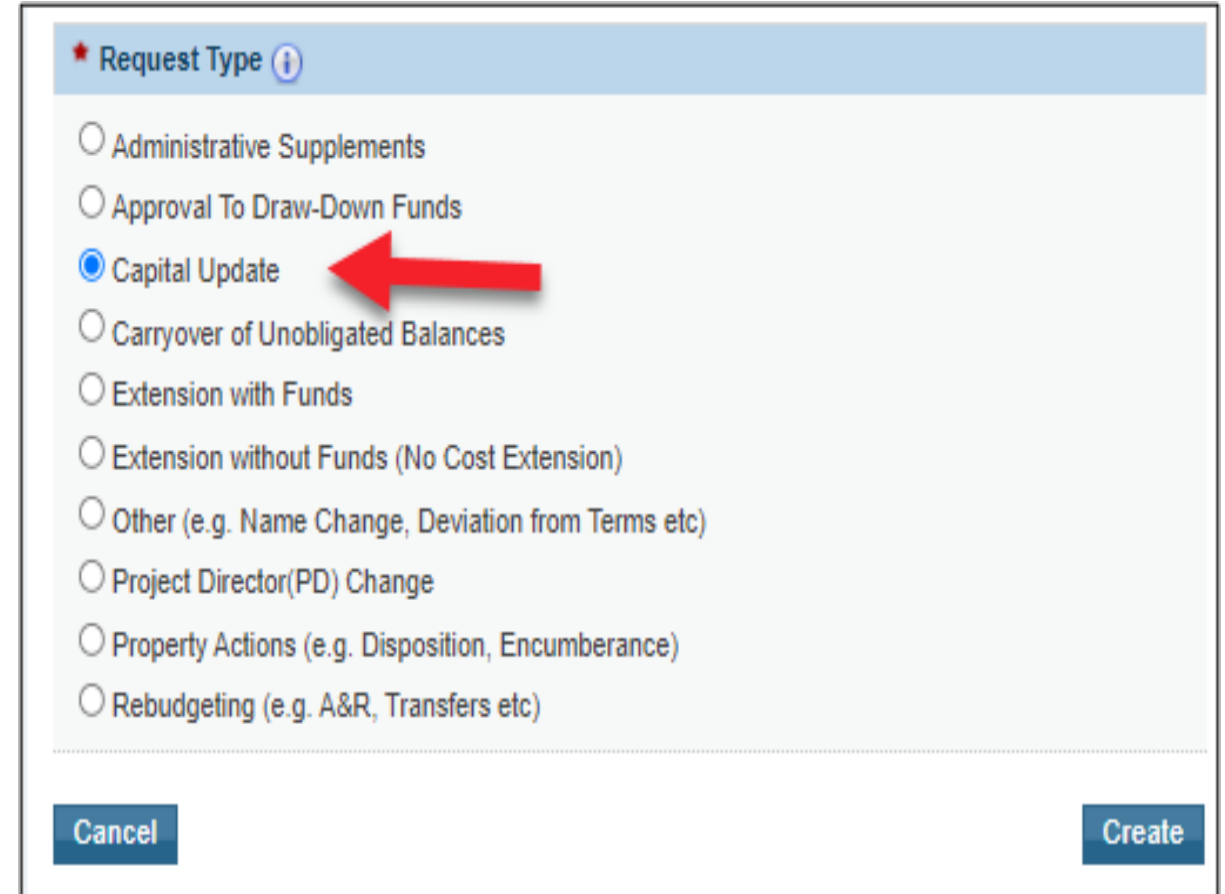
Open and review the document(s) under the **Prior Approval Documentation** section.

* Acknowledgement	
<input type="checkbox"/> I acknowledge that I have reviewed all documentation and would like to proceed further.	
UNIFORM GUIDANCE CODIFIED FOR HHS AT 45 CFR PART 75	
<input type="checkbox"/> I acknowledge that I have reviewed the UNIFORM GUIDANCE CODIFIED FOR HHS AT 45 CFR PART 75 and would like to proceed further.	
<input type="button" value="Cancel"/>	<input type="button" value="Continue"/>

Click the **Acknowledgment** check boxes and then click the **Continue** button. You will land on the **Prior Approval Request Type - Select** page.

# Steps to Create a Prior Approval Request in EHB

Click the radio button for the **Request Type** and then click the **Create** button. You will land on the **Prior Approval - Status Overview** page displaying a "Success" banner.



Request Type ⓘ

- Administrative Supplements
- Approval To Draw-Down Funds
- Capital Update
- Carryover of Unobligated Balances
- Extension with Funds
- Extension without Funds (No Cost Extension)
- Other (e.g. Name Change, Deviation from Terms etc)
- Project Director(PD) Change
- Property Actions (e.g. Disposition, Encumbrance)
- Rebudgeting (e.g. A&R, Transfers etc)

Cancel Create

# Steps to Create a Prior Approval Request in EHB

On the **Prior Approval Request – Status Overview** page, select the forms from the left menu and enter the details in the structured budget forms. The displayed budget forms are based on the Prior Approval Type and Grant Type combination selected.

**Prior Approval Request - Status Overview**

**Success:**  
You have successfully created a Prior Approval Request. The Request Tracking Number is PA-00100078. Please use this number for all future correspondence related to this request.

**PA-00100078 : BEALLS POULENC HEALTH CENTER, BANCROFT, NV** Submission Status: In Progress

Prior Approval Request Type: Capital Update Grant Number: H80CS00589 Project Period: 02/01/2019 - 01/31/2023  
Budget Period: 02/01/2021 - 01/31/2022 Project Title: Health Center Program

**Resources**

**View**  
Last NoA | HRSA Contacts | Awarded Funding Opportunities

**Users with permission on Prior Approval Request (8)**

Prior Approval Status		
Section	Status	Options
General Information	Not Started	Update
Details	Not Started	Update
SF424 A - Section A-C	Not Started	Update
SF424 A - Section D-F	Not Started	Update
SF424 A - Budget Narrative	Not Started	Update
SF424 C - Budget Narrative	Complete	Update
SF424 C - Budget Information	Complete	Update



# Steps to Create a Prior Approval Request in EHB

**Note:**  
You can use the left navigation menu to add budget information to each structured form. OR you can click Update within the **Prior Approval Status** section.

**ALL TASKS** <<

**Prior Approval Functions** ▾

**Overview**

**Status**

**Request Information**

- General Information
- Request Details

**SF-424 A**

- Section A-C
- Section D-F
- Budget Narrative

**SF-424 C**

- Budget Information
- Budget Narrative

**Review and Submit**

- Submit
- Review

**Other Functions** ▾

**Navigation**

- Return to Prior Approvals List

**Prior Approval Request - Status Overview**

**Success:**  
You have successfully created a Prior Approval Request. The Request Tracking Number is PA-00100078. Please use this number for all future correspondence related to this request.

**PA-00100078 : BEALLS POULENC HEALTH CENTER, BANCROFT, NV** Submission Status: In Progress

Prior Approval Request Type: Capital Update Grant Number: H80CS00589 Project Period: 02/01/2019 - 01/31/2023  
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**Resources** ⓘ

**View**

- Last NoA
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**Users with permission on Prior Approval Request (8)**

Section	Status	Options
General Information	Not Started	Update
Details	Not Started	Update
SF424 A - Section A-C	Not Started	Update
SF424 A - Section D-F	Not Started	Update
SF424 A - Budget Narrative	Not Started	Update
SF424 C - Budget Narrative	Complete	Update
SF424 C - Budget Information	Complete	Update




# Steps to Create a Prior Approval Request in EHB

**Note: Depending on the Prior Approval request selected, the details requested within the structured budget forms will change.**

**Prior Approval - General Information**

▶ PA-00084994 : MANAGERS PRESSOTECHNIK UNIVERSITY, BLUE RIDGE, LA Submission Status: In Progress

▼ Resources 

View

Last NoA | HRSA Contacts | Awarded Funding Opportunities

Fields with \* are required

**\* Sub Type**



Name/Entity Change  
(To transfer the legal and administrative responsibility of a grant-supported project or program from one legal entity to another, before the expiration of the approved project)  
For Example: Organization Name Change, EIN Change

Request for change in Terms and Conditions  
(To undertake any activities disapproved or restricted as a condition of the award)

Initiate Relinquishment of Grant  
(To request termination of grant award prior to its scheduled end date)

Other  
(For any other type of Prior Approval Request)

**Contact Information**

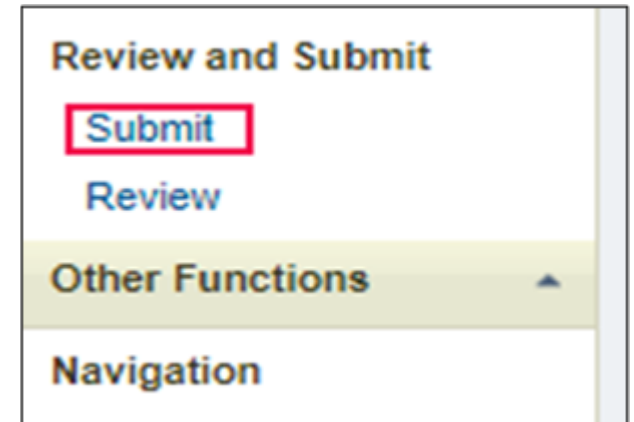
Role	Title	Name	Phone	Email	Options
* Point of Contact					 Add ▼
* Authorizing Official					 Add ▼

Go to Previous Page Save Save and Continue



# Steps to Create a Prior Approval Request in EHB

After completing the Prior Approval Request select **Submit** within left navigation menu. Complete the details provided and **Submit** the Prior Approval Request.



# Best Practices

- **Timely submissions**
- **Submit correct information**
- **Refer to 2 CFR 300 for any policy questions**
- **Refer to the HHS Grants Policy Statement for what to include with your submission**
- **Communication with GMS/PO**



# EHB Resources

[Knowledge Base](#)

[Prior Approval Requests FAQs](#)

EHB Contact Center:

- [HRSAEHTier2Support@hrsa.gov](mailto:HRSAEHTier2Support@hrsa.gov)
- [EHB Support Form](#)
- (301) 443-2112



# Policy Resources

- Uniform Administrative Requirements, Cost Principles, and Audit Requirements: [2 CFR Part 300 \(HHS awards\)](#)
- [HHS Grants Policy Statement](#)



# HRSA Resources

- Notice of Funding Opportunity (NOFO)
- Notice of Award (NoA)
- [HRSA Manage Your Grant](#)
- [HRSA Healthy Grants Workshops](#)
- [Technical Assistance Conference Calls](#)



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# Questions?

