

Prior Approval Requirement for Changes to Domestic Subawards

[NOT-OD-26-062](#)

NIH now requires prior approval for changes to domestic subawards on all NIH grants and cooperative agreements. NIH has a longstanding policy of not requiring prior approval for the addition of domestic subawards to ongoing projects. Effective June 1, 2026, all prime recipients are required to obtain NIH prior approval when adding a new domestic subaward to a project post-award, when the arrangement was not originally a part of the peer-reviewed and approved application.

The new prior approval requirement is intended to ensure that NIH is aware of all subaward activities for each NIH project, so that NIH can monitor the prime recipient and ensure compliance with subaward monitoring and reporting requirements.

Requests must be submitted in the eRA Commons Prior Approval Module using the “Other Request” type. Please work with ORSP to get the prior approval request entered into eRA Commons and submitted.

As a reminder, effective May 1, 2025, NIH no longer recognizes foreign subawards. Recipients seeking to initiate a new international collaboration must utilize the new application structure for NIH-funded international collaborations (PF5/UF5).