

## DEPARTMENT OF AGRICULTURE

### Commodity Credit Corporation and Foreign Agricultural Service

#### Quality Samples Program

##### A. Program Description

**Issued By:** Commodity Credit Corporation and Foreign Agricultural Service

**Catalog of Federal Domestic Assistance (CFDA) Number:** 10.605

**CFDA Title:** Quality Samples Program

**Notice of Funding Opportunity Title:** Quality Samples Program

**NOFO Number:** 2023–03

**Authorizing Authority for Program:** The Quality Samples Program (QSP) is authorized under Section 5(f) of the Commodity Credit Corporation Charter Act, 15 U.S.C. 714c(f).

**Appropriation Authority for Program:** Funding for the QSP is provided under 15 U.S.C. 714b(i).

**Announcement Type:** New.

**Program Overview, Objectives, and Priorities:** The QSP is designed to encourage the development and expansion of export markets for U.S. agricultural commodities by assisting U.S. entities in providing commodity samples to potential foreign importers to promote a better understanding and appreciation for the high quality of U.S. agricultural commodities. The QSP is administered by personnel of the Foreign Agricultural Service (FAS) on behalf of the Commodity Credit Corporation (CCC). QSP participants will be responsible for procuring (or arranging for the procurement of) the commodity samples, exporting the samples, and providing the on-site technical assistance necessary to facilitate successful use of the samples by importers. Participants that are funded under this announcement may seek reimbursement from FAS for the sample purchase price and for the cost of transporting the samples domestically to the port of export and

then to the first foreign port or point of entry. Transportation costs from the first foreign port or point of entry to the final destination are not eligible for reimbursement. FAS will also not reimburse the costs incidental to purchasing and transporting samples, such as: inspection or documentation fees, certificates of any kind, tariffs, demurrage, etc. Although providing technical assistance is required for all projects, the costs of providing such technical assistance are not reimbursable under the program. A QSP participant will be reimbursed after FAS reviews its reimbursement claim and determines that the claim is complete.

**B. Federal Award Information**

**Award Amounts and Important Dates**

*Available Funding for the NOFO:* The QSP will provide up to \$2.5 million in FY 2023 funding to support eligible projects. USDA makes no commitment to fund any particular application or to make a specific number of awards regardless of whether or at what level program funding for FY 2023 is provided.

*Total Award Funding:* \$2,500,000

*Estimated Number of Awards:* It is anticipated that FAS will issue 10–20 awards under the 2023 QSP, subject to programmatic approval and available funding. In general, all qualified proposals received before the submission deadline will compete for funding.

**Period of Performance:** Awards will generally be granted for a project period of one year. FAS will entertain requests to extend the agreement expiration date of an award, up to a maximum award length of five years. (Please see *H. Additional Information*)

**Projected Period of Performance Start Date(s):** 10/01/2022.

**Projected Period of Performance End Date(s):** 10/30/2023.

**Funding Instrument:** Grant.

**C. Eligibility Information**

## **Eligible Applicants**

Any United States private or government entity (excluding FAS Posts) with a demonstrated role and interest in exporting U.S. agricultural commodities may apply to the QSP. Government organizations consist of Federal, State, and local agencies. Private organizations include non-profit trade associations, universities, agricultural cooperatives, state regional trade groups, and profit-making entities.

All applicants must have an active registration in the SAM database at [www.sam.gov](http://www.sam.gov) – pending or expired registrants are not eligible. This requirement must be met before an application will be considered and will not be waived. Please contact the program officer listed if you have questions about this requirement.

## **Eligibility Criteria**

1. Eligible Commodities: U.S. agricultural commodities, except tobacco, produced entirely in the U.S., or a product of an agricultural commodity.

2. Eligible Markets: Proposals may target any foreign market.

3. Eligible Activities: To be found eligible for consideration, QSP proposals must address the following criteria:

- Projects should benefit the represented U.S. industry and not a specific company or brand;
- Projects should develop a new market for a U.S. product, promote a new U.S. product, or promote a new use for a U.S. product rather than promote the substitution of one established U.S. product for another;
- Commodities provided under a QSP project must be available on a commercial basis and in sufficient supply;
- The QSP project must either subject the commodity sample to further processing or

substantial transformation in the importing country, or the sample must be used in technical seminars in the importing country designed to demonstrate the proper preparation or use of the sample in the creation of an end product;

- Samples provided in a QSP project shall not be directly used as part of a retail promotion or supplied directly to consumers. However, the end product (that is, the product resulting from further processing, substantial transformation, or a technical preparation seminar) may be provided to end–use consumers to demonstrate the consumer preference for that end product to importers;
- Samples shall be in quantities less than a typical commercial sale and limited to the amount sufficient to achieve the project goal (e.g., not more than a full commercial mill run in the destination country); and
- Projects should be completed within one year of FAS approval.

QSP projects shall only target foreign importers and audiences who:

- Have not previously purchased the U.S. commodity that will be supplied under QSP;
- Are unfamiliar with the variety, quality attributes, or end–use characteristics of the U.S. commodity;
- Have been unsuccessful in previous attempts to import, process, or market the U.S. commodity (e.g., because of improper specification, blending, formulation, sanitary, or phytosanitary issues);
- Are interested in testing or demonstrating the benefits of the U.S. commodity; or
- Need technical assistance in processing or using the U.S. commodity.

4. Ineligible Activities: QSP funding may only be used for generic activities. For–profit entities may not use program funds to conduct private business, promote private self–interests, supplement the costs of normal sales activities, or promote their own products or services beyond

specific uses approved by FAS in a given project.

### **Cost Share or Match**

Although highly encouraged, there is no cost share requirement for QSP proposals. FAS will, however, consider the applicant's willingness to contribute resources towards the project, including cash, goods, and services of the U.S. industry and foreign third parties, when determining which proposals are approved for funding.

### **Other Eligibility Information**

Proposals should include a justification for funding assistance from the program – an explanation as to what specifically could not be accomplished without Federal funding assistance and why the participating organization(s) would be unlikely to carry out the project without such assistance. Proposals that counter national strategies or duplicate activities planned or already underway by U.S. non-profit agricultural commodity or trade associations will not be considered.

### **Other Submission Requirements and Information**

*Funding Limits:* Individual projects that include further processing or substantial transformation of the sample will be limited to \$75,000 of QSP reimbursement per project, while projects comprised only of technical preparation seminars will be limited to \$15,000 of QSP reimbursement. Applicants may submit more than one proposal, and the number of projects per participant will not be limited. Financial assistance will be made available on a reimbursement basis only; cash advances will not be made available to any QSP participant. FAS will not reimburse unreasonable expenditures or expenditures made prior to the approval of a proposal.

### **Maintenance of Effort (MOE)**

There is no MOE requirement for the QSP program.

## **D. Application and Submission Information**

### **Key Dates and Times**

**Date Posted to Grants.gov:** March 18, 2022

**Application Submission Deadline:** The initial QSP application deadline is 5 p.m. Eastern Daylight Time, Friday, May 20, 2022. Incomplete applications or applications that do not otherwise conform to this announcement by the program deadline will not be accepted for review.

QSP proposals will continue to be accepted and reviewed throughout the remainder of the fiscal year after the initial program deadline only if QSP funding remains available, as set forth in this notice. FAS will track the time and date of receipt of all proposals. All proposals received by the initial program deadline of 5 p.m. Eastern Daylight Time, Friday, May 20, 2022, will be considered for funding in the initial allocation tranche. Proposals not approved for funding during this initial review period will be reconsidered for funding if the applicant specifically requests such reconsideration in writing and only if funding remains available. Proposals received after 5 p.m. Eastern Daylight Time, Friday, May 20, 2022, will be considered for funding in the order received as long as funding remains available.

**Anticipated Funding Selection Date:** FAS anticipates that the initial funding selections will be made by the end of October 2022.

**Anticipated Award Date:** FAS anticipates that the initial awards will be announced by the end of December 2022.

#### **Address to Request Application Package**

This announcement contains all the information needed to apply to the QSP program. For a hardcopy of this announcement or to obtain more information on how to apply to the QSP program, please contact the Program Operations Division, Global Programs, Foreign Agricultural Service by e-mail: [podadmin@usda.gov](mailto:podadmin@usda.gov) or by phone: (202) 690-4784.

#### **Content and Form of Application Submission**

To be considered for the QSP, an applicant must submit an application through the web-

based Unified Export Strategy (UES) system. The UES allows applicants to submit a single consolidated and strategically coordinated proposal that incorporates requests for funding for all of the FAS market development programs. The suggested UES format encourages applicants to examine the constraints or barriers to trade that they face, identify activities that would help overcome such impediments, consider the entire pool of complementary marketing tools and program resources, and establish realistic export goals. Applicants must contact FAS' Program Operations Division to obtain UES website access information. The UES may be found at the following URL address: <https://apps.fas.usda.gov/ues/webapp/>.

Organizations that do not have UES access may request access from FAS by following this 2-step process:

- 1) Users must first create an eAuthentication account and user ID at <https://www.eauth.usda.gov/eauth/b/usda/home>. FAS recommends creating a Level 2 eAuthentication account.
- 2) Users then must submit to FAS a completed UES Access Request form, which may be obtained by contacting the Program Operations Division, Global Programs, Foreign Agricultural Service *by e-mail*: [uesadmin@usda.gov](mailto:uesadmin@usda.gov). Once the request is approved, FAS will create a UES account for the user. Applicants experiencing difficulty or otherwise needing further assistance should use this same contact information for assistance.

To be considered for the QSP, an applicant must submit to FAS an application package consisting of:

- (1) A QSP project proposal that includes the information contained in this notice; and
- (2) Standard Form 424, "Application for Federal Assistance" (SF-424). The SF-424 is a standard form that FAS is requesting as part of the submission of applications under the

QSP program. All applicable parts of the SF-424 must be completed, and the form must be signed by the applicant. FAS will return incomplete SF-424 forms, which may cause delays in processing an application. A copy of the SF-424 may be obtained from Grants.gov. Please email the completed SF-424 to PODAdmin@usda.gov with the subject: "2023 QSP SF-424."

In addition to the required SF-424, each applicant must also complete and certify to the grants "Representations and Certifications" and "Grants Certifications" in SAM.gov by the application deadline. All applicants must also answer "Yes" to the question in the Grants Certification section of SAM asking whether the applicant "Wishes to apply for a Federal financial assistance project or program, or is currently the recipient of funding under any Federal financial assistance project or program?" FAS will verify in SAM.gov that the proper forms are completed. If they have not been, the applicant will be contacted and directed to do so. Your award will not be issued until the proper forms are completed within the SAM.gov portal. If required, the SF-LLL form, "Disclosure of Lobbying Activities," must also be submitted.

QSP project proposals must contain complete information about the proposed projects, including, at a minimum, the following:

1. Organizational information, including:
  - i. Organization's name, address, Chief Executive Officer (or designee), Federal Tax Identification Number (TIN);
  - ii. A Dun and Bradstreet Data Universal Numbering System (DUNS) number;
  - iii. Type of organization;
  - iv. Name, telephone number, fax number, and e-mail address of the primary contact person;
  - v. A description of the organization and its membership;

- vi. A description of the organization’s prior export promotion experience; and
  - vii. A description of the organization’s ability to implement the required trade/technical assistance component.
2. Market information, including:
- i. An assessment of the market;
  - ii. A long–term strategy in the market; and
  - iii. Appropriate trade data for the years 2019 through 2025.
3. Project information, including:
- i. A project title (that includes the commodity);
  - ii. The amount of funding requested;
  - iii. The beginning and end dates for the proposed project;
  - iv. A brief description of the specific market development trade constraint or opportunity to be addressed by the project;
  - v. A description of the activities planned to address the constraint or opportunity, including how the sample will be used in the end–use performance trial, the attributes of the sample to be demonstrated and its end–use benefit, and details of the trade/technical servicing component (including who will provide and fund this component);
  - vi. A description of the sample to be provided (i.e., commodity, quantity, quality, type, and grade), including a justification for why a sample with such characteristics is needed (this justification should explain why the project would not be effective with a smaller sample);
  - vii. An itemized list of all estimated costs associated with the project for which reimbursement will be sought. Detailed cost calculations and justifications for each

budget line item must be provided in the project proposal, and all line items should be described in sufficient detail to enable FAS to determine that the costs are reasonable and allowable for the project; and

viii. The importer's role in the project regarding handling and processing the commodity sample.

4. Projects should include performance measures for quantifying progress and demonstrating results. In the development of performance measures, FAS believes the measures should meet the following criteria:

- Aligned: The indicator should, as closely as possible, measure exactly the relevant result.
- Clear: The indicator should be precise and unambiguous about what is being measured and how. There should be no doubt on how to measure or interpret the indicator.
- Quantifiable: The indicator(s) should sufficiently capture all elements of a result.
- Include an identified methodology: The data can be obtained to inform the indicator in a timely and efficient manner and the data are of high-quality.

5. Information indicating all funding sources and the amounts to be contributed by each entity in support of the proposed project. This may include the organization that submitted the proposal, private industry entities, host governments, foreign third parties, FAS, or other Federal agencies. Contributed resources may include cash, goods, or services.

**Unique Entity Identifier (UEID) and System for Award Management (SAM)**

Applications Submitted Before April 4, 2022: In accordance with the Office of Management and Budget's policy (68 FR 38402 (June 27, 2003)) regarding the need to identify

entities that are receiving government awards, all applicants must submit a Dun and Bradstreet Data Universal Numbering System (DUNS) number. Instructions for obtaining a DUNS number can be found at <http://www.dnb.com/duns-number.html>. An applicant may request a DUNS number at no cost by calling the dedicated toll-free DUNS number request line at (866) 705-5711.

For Applications Submitted After April 4, 2022: As of April 4<sup>th</sup>, 2022, the Federal government will stop requiring the DUNS number in the SAM portal. In its place, applicants will now be required to display a SAM Unique Entity Identifier (UEID). If your entity is registered in SAM.gov, your UEID has already been assigned and is viewable in SAM.gov. The UEID is currently displayed below the DUNS Number on your entity registration record. For more information on this change, please visit GSA.gov and search “Unique Entity Identifier Update.”

In addition, in accordance with 2 CFR Part 25, each entity that applies to the QSP and does not qualify for an exemption under 2 CFR §25.110 must:

- (i) Be registered in SAM at [www.sam.gov](http://www.sam.gov) prior to submitting an application or plan;
- (ii) Always maintain an active SAM registration with current information at all times during which it has an active Federal award or an application or plan under consideration by FAS; and
- (iii) Provide its DUNS number, or a UEID as a DUNS replacement, in each application or plan it submits to FAS.

Applicants are encouraged to register or update their SAM registration early to avoid delays in processing their application. The registration process can take approximately four weeks to be completed. Therefore, registration should be done in sufficient time to ensure it does not impact your ability to meet required submission deadlines. This requirement must be met before an application will be considered and will not be waived. Applicants with pending or expired registrations are ineligible. Applicants whose names are published as ineligible in SAM due to a

violation of a Federal statute are not eligible to apply to the QSP program. Applicants should check their SAM status prior to submitting their application or plan.

Applicants must maintain an active SAM registration at all times during which it has active Federal award or an application under consideration by FAS. FAS will not make an award to an applicant until the applicant has complied with all applicable unique entity identifier and SAM requirements, and, if an applicant has not fully complied with the requirements by the time FAS is ready to make the award, FAS may determine that the applicant is not qualified to receive an award and use that determination as a basis for making an award to another applicant. For questions about this requirement, please contact Curt Alt at (202) 690-4784, Senior Director, Program Operations Division, Global Programs or at [curt.alt@usda.gov](mailto:curt.alt@usda.gov).

### **Intergovernmental Review**

An intergovernmental review may be required. Applicant(s) must contact their State's Single Point of Contact (SPOC) to comply with the State's process under Executive Order 12372 (see <https://www.archives.gov/federal-register/codification/executive-order/12372.html>.) Name and addresses of the SPOCs are maintained at the Office of Management and Budget's home page at: <https://www.whitehouse.gov/wp-content/uploads/2020/04/SPOC-4-13-20.pdf>

### **Funding Restrictions**

Only those QSP activities that are approved in each applicant's agreement may be implemented, and those activities must be implemented during the program period specified in the agreement. Requests for activity changes during the program period must be approved in advance by FAS. The QSP operates on a reimbursement basis.

Generally, funds may not be used in any manner that is prohibited by 2 CFR Part 200 and 2 CFR Part 400 or this Notice of Funding Opportunity. Also, FAS grant agreement funds may only be used for the purpose set forth in the award and must be consistent with the statutory authority

for the award. Grant agreement funds and non-monetary support may not be used for matching contributions for other federal grants or cooperative agreements, lobbying, or intervention in federal regulatory or adjudicatory proceedings. Also, federal funds may not be used to sue the Federal Government or any other government entity.

#### **Management and Administration (M&A) Costs**

M&A costs are not allowable under the QSP program.

#### **E. Application Review Information**

##### **Application Evaluation Criteria**

Prior to making an award, FAS will review all proposals for eligibility and completeness. FAS will, subject to the availability of funds, approve those applications that it considers to best meet the requirements set forth in this announcement. FAS may, when appropriate to the subject matter of the proposal, request the assistance of other U.S. Government experts in evaluating the merits of a proposal. All reviewers scoring a proposal will be required to sign a conflict of interest form, and when conflicts of interests are found the reviewer will be recused from the objective review process.

##### **Application Evaluation Criteria**

FAS is required, as per 31 U.S.C. 3321 and 41 U.S.C. 2313, to review and consider any information about the applicant that is in the designated integrity and performance system accessible through SAM, the Federal Awardee Performance and Integrity Information System (FAPIIS), and the Federal Audit Clearinghouse (FAC). An applicant, at its choice, may review this information and comment on any information about itself that a Federal awarding agency previously entered and is currently in the designated integrity and performance system accessible through SAM, FAPIIS, and FAC. FAS will consider any comments by the applicant, in addition to the other information in the designated integrity and performance system, in making a judgment

about the applicant’s integrity, business ethics, and record of performance under Federal awards when completing the review of risk posed by applicants as described in 2 C.F.R. §200.205 “Federal awarding agency review of risk posed by applicants.”

### **Review and Selection Process**

The purpose of the application review is to rate the qualifications, quality, and appropriateness of projects, determine the reasonableness of project budgets, make recommendations on appropriate funding levels for proposals, and submit the proposals and funding recommendations to appropriate officials for decision making. FAS conducts the following process in reviewing applications and allocating available QSP funds:

*Sufficiency Review (Phase 1):* In Phase 1, FAS conducts an initial review (sufficiency check) of all applications received to determine the completeness of the application and responsiveness to this announcement. If an applicant is determined to be ineligible per Section C, “Eligibility Information,” of this announcement, FAS will not consider the application and will take no further action on it. If an application is determined to be incomplete, FAS will notify the applicant and request that the applicant send in the missing information within 30 days to complete its application. Applications that meet the requirements and are found to be responsive to this announcement will move on to the Phase 2 review.

*Agency Review (Phase 2):* Eligible proposals will be evaluated by the appropriate Commodity Branch in FAS’ Cooperator Programs Division. The Commodity Branches will review each eligible application and will score and recommend funding for each application using the following criteria, with each criterion weighted equally at 10%. Proposals should generally achieve a minimum score of 80% to qualify for approval:

1. Whether or not appropriate trade data for the years 2019–2025 are provided;
2. Whether the benefits of the project would accrue to the entire industry;

3. The appropriateness of the proposed sample size for the project;
4. The ability of the organization to provide an experienced staff with the requisite technical and trade experience to execute the proposal;
5. The extent to which the proposal is targeted to a market in which the United States is generally competitive;
6. The potential for expanding commercial sales in the proposed market;
7. The nature of the specific market constraint or opportunity identified and how well it is addressed by the proposal;
8. The extent to which the importer's contribution in terms of handling and processing enhances the potential outcome of the project;
9. The amount of reimbursement requested and the organization's willingness to contribute resources towards the project, including cash, goods, and services of the U.S. industry and foreign third parties; and
10. How well the proposed technical assistance component assures that performance trials will effectively demonstrate the intended end-use benefit.

FAS will also consider the following unweighted criteria when reviewing each proposal:

- The quality of the performance measures and how effective they will be in demonstrating the impact of the project;
- The assessment of the market;
- The long-term strategy in the market; and
- Export goals in each country.

FAS may, when appropriate, solicit and consider feedback on the proposals from appropriate overseas Posts in their review and in determining the recommended funding level for each applicant, and may request the assistance of other U.S. government subject area experts in

evaluating the merits of a proposal.

*Final Review and Allocation Decision Making (Phase 3):* A summary of the applications and the recommended funding levels for each are provided to the FAS leadership, including the Deputy Administrator of Global Programs and the FAS Administrator, for review and final concurrence. When determining final allocations, the Agency leadership may elect to review and adjust the funding recommendations based on factors such as Agency priorities, priority markets, program impact, the record of performance of the organization in managing past QSP funds, and the organization's likelihood of success.

## **F. Federal Award Administration Information**

### **Notice of Award**

FAS will notify each applicant in writing of the final disposition of the submitted application. FAS will send an approval letter and agreement to each approved applicant. The approval letter and agreement will specify the terms and conditions applicable to the project, including the details of each project, responsibilities of the participant, levels of funding, timelines for implementation, and reporting requirements.

Before accepting the award, the potential awardee should carefully read the award package for instructions on administering the grant award and the terms and conditions associated with responsibilities under Federal Awards. Participants must accept all conditions in this NOFO as well as any Special Terms and Conditions in the Notice of Award to receive an award under this program.

### **Administrative and National Policy Requirements**

All successful applicants for grant and cooperative agreements are required to comply with the Standard Administrative Terms and Conditions, which are available online at:

[https://www.fas.usda.gov/grants/general\\_terms\\_and\\_conditions/default.asp](https://www.fas.usda.gov/grants/general_terms_and_conditions/default.asp). The applicable

Standard Administrative Terms and Conditions will be for the last year specified at that URL, unless the application is to continue an award first awarded in an earlier year. In that event, the terms and conditions that apply will be those in effect for the year in which the award was originally made unless explicitly stated otherwise in subsequent mutually-agreed amendments to the award.

### **Program Performance and Financial Reporting Requirements**

QSP participants must provide interim and final reports that cover the program performance and financial status for each approved project. Interim reports must be submitted within 90 days after the end of each program year, and a separate final report is due no later than 90 days after the activity is completed or the agreement is terminated. All reports must be submitted through the UES.

Each report, whether interim or final, must evaluate the progress of the QSP project using the performance measures presented in the approved proposal, as set forth in the written program agreement, and provide an accounting of all project expenditures by cost category and actual contributions made to the project by the applicant and all other participating entities. Unusual deviations from activity budget amounts or lagging progress on performance measures should be noted and explained. Final reports should address all performance measures that were presented in the proposal in addition to including the following standard performance measures: (1) the number of people/organizations/companies trained, (2) the percent of trainees that have a better understanding of the commodity qualities and uses, and (3) the number of people requesting additional information about the commodity by the date of the final report.

### **Monitoring**

QSP projects and activities are subject to review and verification by FAS' Compliance and Security staff, and/or any designated FAS representatives. FAS reserves the right, at all reasonable

times, to make site visits to review project accomplishments and management control systems and to provide such technical assistance as may be required. During site visits, FAS will review grant recipients' files related to the grant-funded program. As part of any monitoring and program evaluation activities, grant recipients must permit FAS, upon reasonable notice, to review grant-related records and to interview the organization's staff and clients regarding the program, and to respond in a timely and accurate manner to FAS requests for information relating to their grant program. Upon request, a QSP participant shall provide to FAS documentation that supports the participant's reimbursement claims. FAS may deny a claim for reimbursement if the claim is not supported by adequate documentation.

### **Close Out Reporting Requirements**

Within 90 days after the activity completion date, or after an amendment has been issued to close out a grant, whichever comes first, FAS will confirm that the participant has provided all of the required reports and will review the reports for completeness and content. Once the required reports are approved, FAS will prepare a closeout letter that advises the participant of the award closeout procedures. The notice will indicate the period of performance as closed, list any remaining funds that will be de-obligated, and address the requirement of maintaining the grant records for three years from the date of the final progress report.

### **G. Awarding Agency Contact Information**

#### **Contact and Resource Information**

For additional information and assistance regarding this announcement, please contact the following during regular working hours 8:00 a.m. – 5:00 p.m., Eastern Standard Time:

1. *Program Operations Division Contact(s):* Curt Alt, Senior Director, Program Operations Division, Global Programs, Foreign Agricultural Service, U.S. Department of

Agriculture *by courier*: Room 6510, 1400 Independence Ave., SW., Washington, DC 20250, or *by phone*: (202) 690–4784, or *by e-mail* at Curt Alt@usda.gov.

2. *Grants Management Contact(s)*: FAS Grants Management Office *by e mail* at OCOOGrants@usda.gov.

## **H. Additional Information**

1. **Extensions**: Participants may request a no-cost extension to complete all project activities. Extension requests must be made at least 45 days in advance of the agreement expiration date and must include a justification as to why the extension of the award is necessary and how the extension would effectively support the program’s purpose. Extension requests are subject to review and approval by FAS.

2. **Prior Approval**: The Participant shall not, without the prior written approval of the FAS Program Manager, request reimbursement, incur costs, or obligate funds for any purpose pertaining to the operation of the project, program, or activities prior to the approved Budget Period/Performance Period.

3. **Budget Revisions**:

a. Transfers of funds between direct cost categories in the approved budget when such cumulative transfers among those direct cost categories exceed twenty percent of the total budget approved in this Award require prior written approval by the FAS Program Manager.

b. The Participant shall obtain prior written approval from the FAS Program Manager for any budget revision that would result in the need for additional resources/funds.

c. The Participant is not authorized at any time to transfer amounts budgeted for direct costs to the indirect costs line item or vice versa, without prior written approval of the

FAS Program Manager.

4. Program income: Program income is not allowed under the QSP program.