



Authorized Organization Representative (AOR) Change 101

National Telecommunications and Information Administration (NTIA)

This document is intended solely to assist recipients in better understanding grant programs under the Consolidated Appropriations Act (CAA) and the Infrastructure Investment and Jobs Act (IIJA), and the requirements set forth in the Notices of Funding Opportunity (NOFOs) for those programs. This document does not and is not intended to supersede, modify, or otherwise alter applicable statutory or regulatory requirements, the terms and conditions of the award, or the specific application requirements set forth in the NOFOs. In all cases, statutory and regulatory mandates, the terms and conditions of the award, the requirements set forth in the NOFOs, and follow-on policies and guidance, shall prevail over any inconsistencies contained in this document.



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This document provides guidance to CAA and IJA recipients on what an AOR is, when an AOR change is needed, and the general process of executing an AOR change.^{1, 2}



WHAT IS AN AOR?

An **AOR** is a member of an organization that **has signatory authority for all official grant documents**, including applications, monitoring, reporting, and closeout. These individuals are considered key personnel; as such, both NTIA and the applicable Grants Officer must be informed of any changes as soon as possible. Note: there is no need to wait for regular reporting or monitoring to submit an AOR change.



WHAT ARE REASONS FOR AN AOR CHANGE?

Common reasons to change an AOR include:

- AOR has left the organization.
- AOR is frequently unable to sign documents in a timely manner.
- AOR is on long-term leave from the organization.
- Anytime the individual has a conflict of interest with performing AOR duties and responsibilities.
- AOR no longer works/participates in an official capacity with the organization.
- Anytime the individual is unable to perform AOR duties and responsibilities.



WHEN CAN AN AOR CHANGE BE SUBMITTED?

An AOR change can be submitted either pre-award or post award, depending on when the AOR change occurs. If an AOR change occurs pre-award, the applicant should submit an updated SF-424 (Application for Federal Assistance) that reflects the new AOR's information to the appropriate point of contact. If the AOR change occurs post award, recipients should follow the procedures detailed in the following section.

Regardless of when the AOR change occurs, federal requirements mandate that recipients seek NTIA approval before the change occurs. Per 2 CFR 200.308(f)(2), recipients must request prior written approval from the federal awarding agency for any change in key personnel that are identified by name or position in the federal award, which includes an AOR.

¹. While this resource refers to the process as an AOR Change, certain program-specific materials may refer to the same process as an Unfunded Grant Action for AOR Change or a type of Change in Key Personnel Award Action Request.

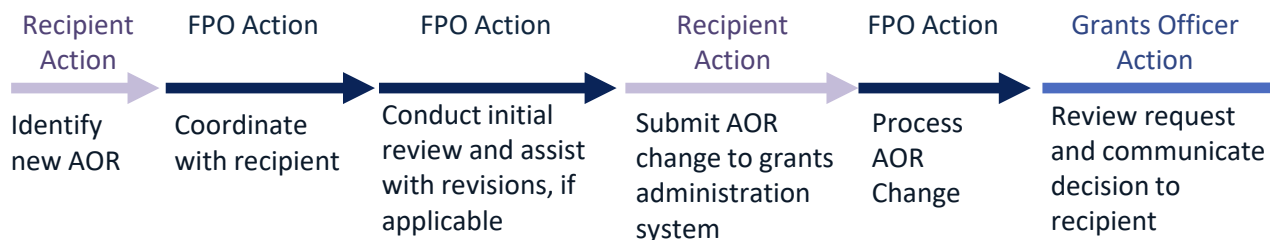
². Recipients should refer to their grant award Specific Award Conditions, terms and conditions, and NOFO for specific AOR change instructions.

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HOW DO RECIPIENTS SUBMIT AN AOR CHANGE?

Figure 1: AOR Change Process



As noted in Figure 1, NTIA suggests that recipients **first coordinate with the assigned Federal Program Officer (FPO)** on an AOR change. Grantees should **send an email** summarizing requested changes and including relevant documents, such as revised organization charts or notices from recipient leadership.³ Following the FPO's initial review, grantees should submit an AOR Change Request via the applicable grants administration system.⁴ Generally, an AOR Change is final after the Grants Officer issues an Administrative Letter approving the change and the FPO has processed the change in the grants administration system.



WHAT HAPPENS AFTER AN AOR CHANGE?

As an AOR change is a type of award action request (AAR), an approved AOR change will result in the issuance of a Notice of Award Document (NoA). Additionally, it is the recipient's responsibility to ensure that the previous AOR no longer has access to:

- Project-related materials,
- Award administrative and financial data, or
- Award-related equipment or other material assets

The recipient should also ensure that project teams, subrecipients, contractors, and vendors are notified of the change are informed as allowed or instructed by organizational policies.



ADDITIONAL QUESTIONS

For additional questions on grant agreements related to the NTIA Grant Programs, please contact your FPO or Grants Office.

³. Recipients must ensure that all AOR changes comply with [2 CFR 200.308](#).

⁴. This may be either the NTIA Grants Portal (NGP) or eRA.