



Version Number: 0001

Version Approval Date: December 3, 2021

Original Approval Date: December 3, 2021

Effective Date: December 13, 2021

Applicable To: Grant Managers/Financial Managers

Key Contact: Contracts Team/ORAs

Guidance on NIH Carryforward Requests

Guidance Rationale

An official request for Prior Approval of Carryforward under an NIH award is necessary when:

- Automatic Carryforward from year to year is not permitted by the Notice of Award (NOA) terms
- Seeking to carry forward residual balances in connection with a second no-cost extension request
- Requesting funds via another institution (HMS is the subrecipient of a sponsored award with any of the above provisions)
- There is a residual balance of greater than 25% reported on the Research Performance Progress Report (RPPR) – Prior Approval may be required on a case-by-case basis per the NIH Grant Management Specialist (GMS)

These requests are scrutinized closely, with NIH looking for a sufficient justification for the unspent balance and the ability to demonstrate that there is a current use for funds requested to be carried forward. If we are not able to demonstrate a current need for the funds, NIH will not authorize those funds to be carried forward. Note that NIH may also approve Carryforward of some, but not all, of the requested funds. If this should occur, the funds not carried forward are not “lost” and can still be requested to be carried forward at a later time, when needed.

NIH awards with automatic Carryforward authority do not require the submission of a Prior Approval request. The NOA may indicate explicitly that automatic Carryforward is allowed and/or may indicate that the award is subject to Streamlined Non-Competing Award Process (SNAP), which includes authorization for automatic Carryforward. If you are unsure whether your grant has automatic Carryforward or not, please contact your [Grants and Contracts Team representative](#).

Related Resources/Referral Links

- NIH Carryforward Request Process:
https://era.nih.gov/erahelp/Commons/Commons/Prior_Approval%20Module/Carryover_process.htm

Definitions

Carryforward is a process through which unobligated funds remaining at the end of the budget period may be carried forward for use during any subsequent budget period (i.e. for sequential periods or from budget “Year 1” to “Year 3”). Note that “Carryover” has a different meaning, and is defined below.

Carryover is synonymous with an offset, which reduces the total amount of federal funds obligated to date (“TAFFOD”) of the award by the amount of the unspent balance between years.

Prior Approval – A formal request submitted to the GMS at NIH by an authorized Signing Official of HMS.

Business Processes/SOPs

Responsible Party Roles:

AMS = ORA Awards Management Specialist

GCO = ORA Grants & Contracts Officer

GM = Grants Manager/Department Administrator

PI = Principal Investigator

PAO = ORA Pre-Award Officer

OSP = Harvard's Office for Sponsored Programs

Step	Responsible Party	Description
1	GM & PAO	<p>Identify the need for submission of a Prior Approval request to NIH for Carryforward at RPPR stage and notify the GCO/AMS promptly of the intent to submit the Prior Approval request.</p> <p><i>*If HMS is subrecipient and either a) the NIH Prime Award requires Prior Approval for Carry Forward or b) the subaward agreement requires approval from the Pass-Through Entity (PTE) for Carryforward, notify the PTE promptly of the intent to request Carryforward.</i></p>
2	GM	<p>Create a Carryforward Request in GMAS with all required information and documentation (see GMAS – Other Request Types). Do not submit GMAS Request until Step 6 below.</p>
3	GM/PI	<p>Draft the Prior Approval request letter and send to GCO/AMS in editable (Microsoft Word) format for review. A Request Letter Template is attached hereto as Appendix A, and a detailed budget template (PHS398 Budget Pages – Form Page 4 and Checklist) is attached hereto as Appendix B. Use of these templates is not required but is strongly recommended; however, all Prior Approval request letters for Carryforward under an NIH award must include the following elements:</p> <ul style="list-style-type: none"> • Explanation of why there are funds remaining • How approved Carryforward funds would be used (including a detailed budget) • How Carryforward would benefit the project's scientific aims, and any impact on the science of the project • If appropriate, how the project timeline will be adjusted to ensure on-time completion <p><i>*If HMS is subrecipient and formal Carryforward request and approval are required <u>only</u> by the PTE (not the NIH), requirements may differ – check with PTE before drafting the request letter.</i></p>
4	GCO/AMS	<p>Review Prior Approval request letter and accompanying documents prepared by GM/PI, together with the GMAS Carryforward Request. Work with department to make any required updates and finalize.</p>
5	OSP	<p>Submit Final Financial Report (FFR) to NIH.</p> <p><i>*If HMS is subrecipient, OSP submits required financial reports to PTE.</i></p>

6	GM	Submit Carryforward Request in GMAS (“lock and route”) and ensure Department Approver signs Request following submission.
7	GCO/AMS	<p>Once finalized, sign and approve Carryforward Request in GMAS and submit Prior Approval request letter, including both PI and GCO/AMS signatures, to NIH for approval via email or eRA Commons (this must be done by an authorized Signing Official of HMS).</p> <p>For Prior Approval requests for Carryforward over sequential years (i.e. from budget “Year 1” to “Year 2”), it is strongly recommended to submit the Carryforward request letter to NIH as soon as the FFR is <u>submitted</u>, since the award date for Carryforward is based on (and cannot be earlier than) the request submission date.</p> <p>For Carryforward requests across non-sequential years (i.e. from budget “Year 1” to “Year 3”) the FFR must be <u>accepted</u> before the Carryforward request letter is submitted to NIH, but it is still recommended to submit as soon as possible.</p> <p><i>*If HMS is subrecipient, requests will be sent to the PTE in accordance with their requirements.</i></p>
8	GCO/AMS	<p>Upon NIH approval of the Carryforward and receipt of award notice, submit the notice to SPA_Award@hms.harvard.edu to be logged as a Notice in GMAS against the Carryforward Request.</p> <p>Upon (final) NIH disapproval, navigate to the Carryforward Request in GMAS and select “Request Closeout” > “Rejected by sponsor.”</p>
9	GM	<p>Complete the CF Allocation Spreadsheet (or similar spreadsheet with same information included) attached hereto as Appendix C and upload into the GMAS Notice document repository.</p> <p><i>*The CF Allocation Spreadsheet differs from the PHS398 Budget Pages. The latter is the budget format typically required by NIH and should be included in the Prior Approval request sent to NIH. The CF Allocation Spreadsheet provides the Operations Team with the information needed to allocate approved Carryforward across accounts in GMAS. Both are required at different times in the process, for different purposes.</i></p>
10	GCO/AMS	Review award notice and CF Allocation Spreadsheet. Upon resolution of any issues or questions, submit datasheet asking ORA Operations Team to process the award notice.

Appendices

Appendix A: Carryforward Request Letter Template

Appendix B: Detailed Budget Template (PHS398 Budget Pages – Form Page 4 and Checklist)

Appendix C: CF Allocation Spreadsheet