Requesting Changes to Sponsored Awards in GMAS: Guidance by "Other Request" Type

Introduction

This document is intended to provide guidance to HMS departments on how to process certain changes on sponsored awards. In most cases a formal GMAS Request is required to be submitted by the department, but not always. Before processing these Requests, Contracts Team representatives should ensure that the Requests are complete and that appropriate approvals are sought from sponsors according to sponsor terms and conditions.

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1. Additional Subagreement at No Additional Cost

GMAS Entry

When requesting any subaward that was not included at the proposal stage, enter a Subagreement Addition at No Additional Cost Request (under **Changes to existing segment**) with the information below:

- Enter the justification for the new Subagreement
- Create new subagreement within the Request: Click Subagreements > Create New Subagreement
 - $\circ\quad \text{Enter subrecipient institution}$
 - o Enter subrecipient PI
 - Enter proposed start and end dates of subagreement (cannot extend past main account end date)
 Click OK
- Note the amount to allocate to the subaward, and which account to move funds from, in the Comments.
- Click on breadcrumb for Request Home

Special Notes

- You may use one Request to enter all subawards known of at that time
- You may also start the process from the Subagreements module, in which case you would click on Create Subagreement, then complete the steps above starting with the justification.

Upload Documents

• Proposal from sub institution including, at minimum, Statement of Intent, Budget with Justification, SOW

Required GMAS Signatures

- Principal Investigator (PI)
- Department Chair or Department Approver
- Sponsored Programs Approver (Grants & Contracts Team)

2. At-risk Account(s)

GMAS Entry

Enter an At-Risk Account Request (under Internal requests) with the information below:

- Justification for at-risk account
- Department account that will be used to recover any at-risk expenses not paid by sponsor

If the award is pending (there are no active accounts):

- From the Request homepage, click on the "Edit" button of the "At-Risk Accounts" section
- On the next screen, check the box to select the Main account, then click "Next"
- Enter at-risk amount, start and end date, then click "Finish"

If the award has existing accounts (adding a POA or a main account for a new year):

- From the Request homepage, click on the "Accounts" link > "Add Account"
- Fill in <u>only</u> the required fields (Type, Description and Account Group) and click "OK"
 If the at-risk is for a new year's Main account (year logic), choose "00-New Account Group"
- From Request home, click on the "Edit" button in the "At-Risk Accounts" section
- Check the box to select the account you just created, then click "Next"
- Enter at-risk amount, start and end date, then click "Finish"

Special Notes

- If requesting an at-risk for a POA where the main award is managed by another tub/org, the managing org will need to enter the Request in GMAS. Please coordinate with the department administrator in that org to provide the information or documentation they require. They can add required POA signatures in GMAS for your Department Approver.
- To extend an existing at-risk account, a Request is not required. Email your Grants & Contracts Team representative with the requested end date and justification.

Upload Documents

• Any relevant documentation. For example, if we are receiving a subaward, upload email from the prime award recipient (our sponsor) stating their intention to send a subagreement/amendment granting HMS new funds.

Required GMAS Signatures:

- Principal Investigator
- Department Chair or Department Approver
- Sponsored Programs Approver (Grants & Contracts Team)

3. Budget Change

GMAS Entry

Enter a Budget Change Request (under **Changes to existing segment**) with the information below:

- Select the University Authorized Signatory (Grants & Contracts Team) as Central reviewer.
- Select the appropriate budget type:
 - Account reallocation used to request reallocation of funds across accounts and object codes. Requires sponsor approval for Federal projects if the restricted funds flag is selected. The amount, from account, from object code, to account, and to object code will need to be entered.
 - Rebudget used to request changes in the original proposed budget, or to request a rebudget during the life of the award. If no new subagreement costs, then the new direct costs, new indirect costs, and total costs will need to be entered. If there are new subagreement costs, that figure will also need to be entered.
 - Equipment rebudget used to request a rebudget of funds to purchase equipment that was not included in the original request. This request is only entered into GMAS when it is required that the sponsor approve the change in budget to purchase equipment. Vendor, equipment to be purchased, and price of equipment will need to be entered.
- Justification for budget change

Upload Documents

• Any relevant documentation. For example, if sponsor approval is required, that approval if received.

- Principal Investigator
- Department Chair or Department Approver
- University Authorized Signatory (Grants & Contracts Team)

4. Carryforward

GMAS Entry

Enter Carryforward Request (under Changes to existing segment) with the information below:

- Total amount to be carried forward
- Periods to carry forward from and into
- If award includes subaward(s), should carryforward be awarded to subrecipient(s) as well? Amount/periods?
 - To request carryforward on a subaward after a Carryforward Request for our primary award has been processed for the corresponding period, email your Grants & Contracts Team representative. A separate Request is not required.
- Justification extent of justification may vary by sponsor; please check award notice or sponsor guidelines or policies. For NIH awards where prior approval is required, check if institute has required procedures. Typically, the following is required (at minimum):
 - a detailed budget for the carryforward amount
 - a scientific justification of why the work is necessary and why it can't be covered by rebudgeting current awarded amounts
 - o an explanation of why the funds weren't expended in the previous period as originally planned

Upload Documents

- Request letter to sponsor (where required)
- Sponsor's approval of the carryforward (if already received)

Required GMAS Signatures

- Principal Investigator
- Department Chair or Department Approver
- Sponsored Programs Approver (Grants & Contracts Team)

5. Change PI

GMAS Entry

Enter a Change PI Request (under **Changes to existing segment**) with the information below:

- Justification for request
- Names of old PI and new PI, plus tub/org for new PI if different
- PI change effective date and, if applicable, org change effective date
- Breakdown of funds spent by original PI and amount to be transferred to new PI

Special Note on Approvals

Email any ethical approvals (IRB, IACUC, etc.) for the new PI to your Grants & Contracts Team representative; they will coordinate with Pre-Award to clear GMAS approvals as needed.

Upload Documents

Any communications with sponsor regarding PI change should be uploaded in GMAS (i.e. transfer application, other approval) – if sponsor issues a formal amendment, email to your Grants & Contracts Team representative to be logged as a Notice

- Principal Investigator
- Department Chair or Department Approver for original PI's department
- Department Chair or Department Approver for new PI's department (if different)
- Sponsored Programs Approver HMS ORA (Grants & Contracts Team)
- Other signatures, as required by new PI tub and org

6. Change Tub/Org

GMAS Entry:

No entry in GMAS. Notify your Grants & Contracts Team representative via email as soon as possible if an award requires a change of tub or org. Your Grants & Contracts Team rep will follow ORA's internal process for changing tub/org. Please provide the following information:

- Justification
- Old and new tub and/or org values
- Is this related to a change in PI? If yes, is the PI acting as a mentor for a fellowship?

Upload Documents

• N/A

Required GMAS Signatures

• N/A

7. Early Termination

Early termination of an award often applies to fellowships, where the fellow has procured a faculty position and no longer is eligible for a postdoctoral fellowship. Early termination requests are also used when a PI is leaving HMS. Each of the PI's awards must be reviewed, and sponsors' instructions for relinquishing the award and/or changing the awardee institution must be followed.

ORA should be notified as soon as possible in the case of a faculty member leaving HMS. Please refer to the HMS "Faculty Exit Guidelines" as well.

GMAS Entry:

Enter an Early Termination Request (under **Changes to existing segment**) with the information below:

- Justification for request
- Anticipated effective date of termination
- Total funds spent prior to termination

Upload Documents

- Sponsor instructions/communications about termination requirements, approval (if already received) if sponsor issues a formal amendment, email to your Grants & Contracts Team representative to be logged as a Notice
- For NIH, upload the completed Relinquishing Statement(s) or, for fellowships, the Termination Notice(s).

- Principal Investigator
- Department Chair or Department Approver
- Sponsored Programs Approver (Grants & Contracts Team)

8. Edit Research Team & Confirm Research Team

GMAS Entry

The research team will always need to be confirmed at the initial award stage. Clicking on "Confirm research team" will generate a Confirm research team Request. If there have been any changes to the research team since the initial proposal, enter the information below in the Request. For all changes in research teams after initial award setup, enter an Edit research team Request with the information below. See also <u>Confirm research team</u> and <u>Edit research team</u> job aids for more detailed guidance.

- Enter the justification for the change in the research team.
- If editing the role or level of effort of an existing member of the research team, click "Edit" next to the appropriate member of the research team.
 - Modify the role or committed effort as appropriate.
 - If making changes to faculty or if sponsor approval is required for the change, the request will need to be reviewed by a Sponsored Programs Approver (Grants & Contracts Team).
 - o Click "Done."
- If adding a new individual to the research team, click "Add" above the list of current research team members.
 - Enter in the individual's name, role, committed effort, and whether they are an Investigator or Key
 personnel; GMAS will automatically designate the individual as faculty or non-faculty based on their
 salary object code. For more information, please see the <u>Managing the GMAS Research Team</u> guidance.
 - Indicate whether sponsor approval is required to change effort. If so, the Request will need to be reviewed by a Sponsored Programs Approver (Grants & Contracts Team).
 - o Click "Done."
- Departments can finalize Edit research team Requests and Confirm research team Requests by clicking the "Finalize changes" button at the top of the Request *except for two instances*:
 - 1. Sponsor approval is required for the change; or
 - 2. Changes are made to a faculty member, regardless of whether sponsor approval is required.
- If changes are made to a faculty member or to another research team member for whom sponsor approval is required, lock and route the Request for central review by a Sponsored Programs Approver (Grants & Contracts Team).

Special Notes

- GMAS will not permit another Edit research team Request if there is an existing Edit research team Request that has not been awarded yet. If there are multiple changes contemplated, it is recommended to first enter one Request for the changes that do not require sponsor approval, if any, and then enter a Request (or Requests, as appropriate) for any changes that do require sponsor approval.
- You may also start the process from the Research team module, in which case you would click on "Create request to edit research team," then complete the steps above starting with the justification.
- Committed effort on the GMAS research team should not be updated to match *actual* effort or salary costing. Changes to costing/actual expended effort *may* indicate that a request to change the individual's effort commitment to the sponsor is in order, but these changes do not themselves constitute a change to the committed effort per the University definition. For more information, see <u>Managing the GMAS Research Team</u>.
- Clicking the trash can icon will delete the research team member from the project completely, and may also remove approvals associated with this individual. When confirming the research team at initial award stage, deleting research team members who prepopulated from the original proposal research team will not result in any modifications to the submitted Initial proposal in GMAS, but will remove the deleted individual from the segment research team once the Edit research team Request is finalized/awarded.
- Adding an individual to a research team in the "Investigator" role will generate an email to the individual from Harvard's Outside Activity and Interest Reporting (OAIR) system with a link to the research certification for that project. The associated approval will remain outstanding in the GMAS project until the individual completes the certification in OAIR,

• **Do not finalize the Edit research team Request** if there is an outstanding OAIR approval; if the individual has not signed a Participation Agreement (PA); or if the PI, Key Personnel, or those designated as "Investigators" have not completed their annual Harvard Malign Foreign Talent Recruitment Program (MFTRP) Attestation.

Upload Documents

• Any relevant documentation, such as communication from the sponsor approving the change, if required.

Required GMAS Signatures

- Principal Investigator
- Department Chair or Department Approver
- Sponsored Programs Approver (Grants & Contracts Team) <u>only if</u> sponsor approval is required for the change or changes are being made to a faculty member (regardless of whether sponsor approval is required).

9. Interfaculty Involvement (IFI) Addition at No Additional Cost

(New "part-of account" or "POA" in a different Org from the main account)

GMAS Entry

An IFI Request is generally not required to add a standard part of account. POAs can be created at initial award stage using the standard account allocation spreadsheet. To request a POA after initial award setup, email your GCO/NIH Awards Officer an updated account breakdown spreadsheet, along with the following information: purpose or justification for the new account, any special instructions on naming the new account, the amount to be obligated to the new account and where the funds are being reallocated from, and the period of performance for the new account.

Exception: For grant-making grants in which the quad-based recipients will need to submit proposals and sign letters of agreement, it is advised to submit an IFI Request for each POA so that the Request can serve as a repository for relevant documentation. In such cases, enter an Interfaculty Addition at No Additional Cost Request (under **Changes to Existing Segment**) with the information below:

- Justification for the new interfaculty involvement/part-of account
- From Request homepage, click on Edit button for Interfaculty Involvement component > Add Tub/Org
 - Enter applicable GMAS Org
 - Enter the IFI Principal Investigator
 - Enter start and end dates of involvement
 - o Enter Department Administrator
- Click OK until you return to Request Home

Special Notes

- As appropriate, add the IFI Principal Investigator and any additional IFI faculty to the research team using the Confirm research team Request or an Edit research team Request
- In addition to what is entered in GMAS, email your Grants & Contracts Team representative with the following information: Dollar amount to add to POA, account to take funds from, activity value for new POA, how to name POA, IFI department administrator(s) for GMAS Admin Team, plus IFI tub, org, and root.

Upload Documents

• IFI POA proposal from IFI department, with appropriate signatures/approvals

- Principal Investigator
- Department Chair or Department Approver for HMS department
- Department Chair or Department Approver for IFI POA department
- Sponsored Programs Approver HMS ORA (Grants & Contracts Team)
- Other signatures, as required by IFI POA tub and org

10. International Collaborations and Activities (ICA)

GMAS Entry

Award stage: Upon the logging of an award notice, GMAS will generate a requirement for the department administrator to confirm the ICA information entered at proposal stage. If there has been no change from what was entered at proposal stage, the department should click on "Confirm current version of form" under "Actions" within the ICA Approval. If ICA information has changed since the Initial proposal was submitted in GMAS, the department should click on "Create new version of the form" under "Actions". This will generate an International collaborations and activities Request, which should include the information below.

Post-Award: If ICA information has changed after initial award setup, departments should create a new International collaborations and activities Request from the Requests page and include the information below. See also <u>International</u> <u>Collaboration and Activities Request – Department Administrator</u> job aid for more detailed guidance.

- Enter a justification for the Request.
- Click on the "Edit" button next to the text stating "International form has not been completed" and update the International form. See <u>International Collaborations and Activities Request Department Administrator</u> for guidance on completing the form.
 - Within the form, check the box for each international activity that applies to the project. In some cases, clicking on the checkbox may generate additional questions which need to be answered before finalizing the Request.
- When the form is completed, click "Save." Upload any relevant documentation to the document repository and lock and route the request for signature.
 - If any aspect of the international activities (including international sponsors or subrecipients) are based in a country designated as a "country of concern" by OVPR, add OVPR as a signatory in GMAS (currently Russ Ashenden) and provide supporting information in the associated comments field in the international form.
 - If you're not sure if a country is designated as a "country of concern," consult with your Sponsored Programs Approver (Grants & Contracts Team)

Upload Documents

• Any relevant documentation, such as sponsor communications/approvals or information about the nature of the international activities.

- Principal Investigator (PI)
- Department Chair or Department Approver
- Sponsored Programs Approver (Grants & Contracts Team)
- OVPR (currently Russ Ashenden), only if the project involves an international component that is based in a country that has been designated as a "country of concern" by OVPR or the project involves the establishment of a "new international site" in accordance with the definition set forth in the <u>Criteria for Provost's Review of New Projects or Grants</u>

11. New account(s) within Same Org

(New "part-of account" or "POA" in the same Org as the main account)

GMAS Entry

N/A – Request for additional part of accounts (subactivities) within the award's managing org can be emailed directly to your Grants & Contracts Team Representative with the following information:

- Purpose/justification for new account(s)
- Any special instructions on how to name the new account(s)
- Dollar amount to add to new account(s) and where to take funds from
- Period of performance for new account(s)
- Activity value for new accounts (s)

Upload Documents

• N/A

Required GMAS Signatures

N/A

12. No-Cost Extension (NCE)

GMAS Entry

To extend the primary award, enter a No-Cost Extension Request (under **Changes to existing segment**) with the information below as well as the special instructions by NCE Type:

- Justification scientific/programmatic justification from PI (i.e., not just that there's a balance)
- Requested new end date (usually 12 additional mos. for an initial NIH extension)
- Approximate remaining balance
- Address the following 2 questions in the Request Comments:
 - o If applicable: will any part-of accounts or subawards on the project be extended as well?
 - Note that the subaward end date will NOT change until the amendment is fully executed.
 - To request an NCE on a subaward or part-of account after an NCE Request for our primary award has been processed for the corresponding period, email your Grants & Contracts Team representative. A separate Request is not required.
 - Will the PI's effort will be reduced by more than 25% during the extension period?
- The Research Team (segment) should be updated to remove anyone no longer working on the project.

Special Instructions by NCE Type (NIH initial, NIH initial after period ends, NIH second NCE, NCE for non-NIH)

All no-cost extension requests should be entered in GMAS as outlined above. Further instructions and due dates by NCE request type should be followed below.

Initial NIH NCE prior to award end date

GMAS Request should be entered and signed by department <u>at least 5 days before</u> the current end date of the award. Your Grants & Contracts Team representative will submit the NCE request electronically in eRA Commons.

NIH Initial NCE Request Sent after the Period Ends

After the Project Period ends, authorized officials will no longer have the option to extend in eRA Commons and you must send a detailed approval request to your Grants & Contracts Team representative to email to NIH.

The request letter to the NIH Grants Management Specialist (GMS) should include:

- Grant number
- Explanation of the need for an extension
- Brief, up-to-date progress report
- Activities to be completed during the extension period (i.e., scientific justification)
- Amount of remaining grant funds
- Detailed description of proposed use of unexpended funds (either a detailed budget or narrative description)
- Updated IACUC and/or IRB approvals, if required

NIH Second NCE Request

Follow the instructions above for <u>NIH Initial NCE Request Sent after the Period Ends</u>, but be sure to send request to NIH no later than 30 days prior to the grants Project Period end date.

The request for the second no-cost extension must be evaluated and approved by the Office of Extramural Activities and, when granted, is for purposes other than completion of manuscripts. Additional no-cost extensions beyond the second will <u>not</u> be considered.

NCE Requests to Sponsors Other than NIH

No-cost extensions for projects funded by sponsors other than NIH should follow the guidelines of the sponsor. Check the award documents, proposal guidelines, and/or sponsor website for instructions on how to submit the NCE request, and coordinate with your Grants & Contracts Team Representative. Note that some sponsors will authorize an NCE via email while others require a formal amendment, which will be processed as a Notice against the award in GMAS.

Upload Documents

- For NCE requests that require sponsor approval, upload the request letter into the Documents
- Sponsor's approval of the extension (if already received)

Required GMAS Signatures

- Principal Investigator (PI)
- Department Chair or Department Approver
- Sponsored Programs Approver (Grants & Contracts Team)

13. Pre-award Expenditure (for federal grants only)

GMAS Entry

If the request for pre-award spending is concurrent with either:

- a) <u>At-Risk Account Request</u> complete "Pre-award expenditure" component within the At-Risk Account Request
- b) <u>Notice</u> enter a Pre-award expenditure Request (under **Changes to existing segment**) with the information below:
 - Justification
 - Pre-award start date (GMAS defaults to 90 days prior to award start date)
 - Pre-award amount (DC + IDC breakdown)
 - Which account(s) to apply pre-award spending

Upload Documents

• N/A for pre-award spending within 90 days prior to award start date. If pre-award spending needed for more than 90 days prior to start date, upload sponsor approval and other supporting documentation.

- Principal Investigator (PI)
- Department Chair or Department Approver
- Sponsored Programs Approver (Grants & Contracts Team)

Appendix A – Special Rules

Please note the following special rules:

* 1. For Fellowships (where the fellow is listed as PI) both the PI and faculty mentor's signature is required. If the fellow or the mentor is not yet at HMS, follow the instructions <u>HERE</u> to follow the Person of Interest (POI) Review and Approval Procedure and have them added to GMAS so they can sign off on the request and complete their COI disclosure electronically.

2. In cases where the PI (not fellow) is not yet at HMS, but we are submitting an application to be awarded after their arrival, follow the instructions <u>HERE</u> to follow the Person of Interest (POI) Review and Approval Procedure and have them added to GMAS so they can sign off on the request and complete their COI disclosure electronically.