



Purpose: SPA has a process to automatically establish at-risk accounts for NIH awards in year logic (where a new account or set of accounts is established for each budget period of the award). The term “streamlined” refers to the fact that SPA does not require the department* to enter an at-risk account request in GMAS for these accounts to be set up.

Considerations:

Approvals:

Department administrators should work with their PI and SPA Pre-Award Officers (PAOs) to clear any approvals that are outstanding at the JIT stage. At-risk accounts cannot be established until the following approvals are in place:

- The **OAR-COI** (conflict of interest) approval status for each investigator on the project must have a status of “Review complete: OK to fund” or “Withdrawn.”
- For projects which involve **human subjects** research, an **IRB** approval or cede review letter (when the human subjects research is being performed at another institution) must be received by SPA. (The sole exception is NIH Predoctoral Fellowship awards; see process below for further detail.)

There are two processes SPA uses to set up streamlined at-risk accounts, based on award type:

1. For NIH predoctoral fellowships (F30 & F31) if waiting for Activation Notice and/or Approvals, in order to facilitate timely payments to stipendees.
2. For other NIH year logic accounts (including, but not limited to, F32, T, U, & Center grants), as identified in the monthly *HMS Streamlined At-Risk Accounts* report. (Note that although the report includes an “Authorized Signature” line per org, no signatures are required.)

Standards of Service: SPA aims to set up at-risk accounts for the awards identified in this document at least one month prior to the start date of the new account, but typically as soon as required approvals (as outlined above) have been cleared.

Process Steps for NIH Predoctoral Fellowship (F30/F31) Streamlined At-Risk Accounts

Step	Role	Task/Activity
1	OPS	SPA Operations team (OPS) logs notice of award for F30 or F31 in GMAS and emails it to PI, GM, and SPA GCO. Copies the PAOs (Pre-Award Officers) if any approvals are needed. If OAR-COI approvals are needed, OPS emails coiforms@hms.harvard.edu with copy to the PAOs & GCOs to notify them that the award is in and to request that a review be performed and approvals cleared.
2	GCO	GCO reviews notice and corresponding segment in GMAS. <ul style="list-style-type: none"> • If in first year of award (-01), note the issue date of the notice. The first of the month following the NOA issue date will be the start date of the at-risk account. (e.g., if NOA is issued on 7/24/17, the start date of the at-risk account for Y1 will be 8/1/17.) • If award is in year -02 or -03, checks whether at-risk accounts have been established already for those years.
3	GCO	If OAR-COI approvals are needed, sets aside until notified that these approvals have been cleared. Once the approvals are cleared, submits data sheet to OPS to request account setup.
4	OPS	For new awards, establishes at-risk Main account for year 01 only. For continuation notices, establishes at-risk accounts for current year and future year of the award (i.e., if in year 02, set up at-risk accounts for -02 and -03).
5	GCO	For year 01, upon receipt of Activation Notice from department, reviews, signs and submits Activation Notice to NIH and uploads it to the Notice repository in GMAS. Checks that all

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		approvals on the segment have been cleared. Once cleared, submits a datasheet to OPS to remove the year 01 account from at-risk and to change the start date to match the Activation Notice (if differs from that of the at-risk account), and to set up at-risk accounts for future years of the award (typically years 02 & 03).
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Process Steps for NIH Predoctoral Fellowship (F30/F31) At-Risk Accounts (continued)

Removal from at-risk status		
6	OPS	Once Activation Notice has been submitted and uploaded to the Notice documents and ALL approvals have been cleared, obligates funding for current year and removes account from at-risk status, per activation notice and notice of award. Sets up future years in at-risk status.

Process Steps for Using the HMS Streamlined At-Risk Accounts Report

Step	Role	Task/Activity
1	FSS	FSS sends “HMS Streamlined At-Risk Accounts” batch report on the 1 st of each month to spa_award mailbox, listing NIH awards in year logic for which the active account(s) will expire in 3 months.
2	OPS	Reviews report. For each award: <ul style="list-style-type: none"> • Checks for needed approvals. If any, emails PAOs. • Checks to see if an early termination request has been entered (if yes, do NOT proceed).
3	OPS	Once COI & IRB approvals have been cleared, establishes at-risk accounts for the Main and any Part-of Accounts (POAs) on the award.
Award Stage – removal from at-risk		
4	GCO	Once notice of award is received, follows standard process for reviewing and accepting notice and checking approvals for completion; completes Datasheet for OPS to remove the account(s) from at-risk status.
5	OPS	Removes account(s) from at-risk status and obligates funding for new period.

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