

Harvard Medical School Sponsored Programs Administration (SPA) Business Process – Streamlined At-Risk Accounts

Effective: 03/01/17 **Revised:** 02/06/17

Purpose: SPA has developed a process to automatically establish at-risk accounts for NIH awards in year logic (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 rep to clear any approvals that are outstanding at JIT stage (when applicable), or at time of award. At-risk accounts cannot be established until the following approvals are in place:

- The **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interest) approval status for each investigator on the project must have a status of "Review complete: OK to fund" or "Withdrawn."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 (if the HS research is being performed at another institution) must be received by SPA.

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 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 GCOs (Grants & Contracts Officers) aim 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.

Process Steps for NIH Predoctoral Fellowship 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.		
2	GCO	SPA Grants & Contracts Officer (GCO) reviews notice and corresponding segment in GMAS.		
		If first year of award, asks department for start date (activation date) of the fellowship.		
		Uploads email with confirmation of start date in Notice documents in GMAS.		
		Checks approvals. (GCO cannot move forward with account setup if COI or IRB approvals		
		are needed.)		
		For subsequent years of award, checks whether at-risk accounts have been established		
		for the current and future years.		
3	GCO	Completes a Datasheet to request that at risk accounts for all upcoming years of the award be		
		set up. Notes "streamlined process" on Datasheet, so OPS knows no GMAS request is needed.		
		(If the Activation Notice has been received and there are no outstanding approvals on the		
		segment, the account for the current year can be set up as an active account (not at-risk) and		
		at-risk accounts can be established for future anticipated years.)		
4	OPS	Establishes at-risk Main accounts for the award, per Datasheet.		
Removal from at-risk status				
5	GM	Department administrator/Grants Manager (GM) works with the PI to clear any approvals		
		that remain outstanding at time of at-risk account setup, so the account(s) may be removed		
		from at-risk status once the Activation Notice has been submitted.		

^{*}The term "department" is used here to refer to any school unit and includes divisions, centers, institutes, programs, and the like.



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6	GCO	Once Activation Notice has been submitted and uploaded to the Notice documents and all approvals have been cleared, completes Datasheet for OPS to remove the current year account from at-risk status, per notice of award.
7	OPS	Obligates funding for current year and removes account from at-risk status, per activation
		notice. Leaves future years in at-risk status.

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

Step	Role	Task/Activity			
1	ATS	Administrative Technology Services (ATS) sends 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	SPA Operations team (OPS) forwards report to all SPA GCOs.			
3	GCO	Grants & Contracts Officer (GCO) reviews report for accounts in their org and for each award:			
		Checks for needed approvals. If any, contacts Dept. Admin./GM.			
		Checks to see if an early termination request has been entered (if yes, do NOT proceed)			
		with setting up at-risk account).			
4	GM	Department administrator/Grants Manager (GM) works with PI to clear any needed			
		approvals.			
5	GCO	Once all approvals have been cleared, completes a Datasheet for each award to request that			
		at-risk account(s) be set up for the upcoming budget period. Notes "streamlined process" on			
		Datasheet, so OPS knows no GMAS request is needed.			
6	OPS	Establishes at-risk accounts for the Main and any Part-of Accounts (POAs) on the award, per			
		Datasheet.			
Award Stage – removal from at-risk					
7	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.			
8	OPS	Removes account(s) from at-risk status and obligates funding for new period.			

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