



Purpose: An established business process around Departmental At-Risk Account requests ensures that all at-risk accounts are set up in a standardized way but more importantly, that risks associated with these accounts have been mitigated prior to set-up. The risks of not adhering to this policy include delays in account set-up or the absorption of expenses by the department due to insufficient risk assessment.

Benefits: There are a number of benefits of using departmental at-risk accounts. For example, compliance issues can be monitored such as the tracking of IRB or IACUC approvals. In addition, requesting an at-risk account rather than using a discretionary account will eliminate the need for cost transfers once the award is received.

Guidelines & Considerations:

- a) Sponsor terms and conditions: It is important to note that some sponsors may not allow spending prior to the start date or the execution of the award. Please check with sponsor guidelines before requesting an at-risk account for pre-award spending. This is particularly important if you are dealing with a new sponsor.
- b) If spending = Acceptance: It should also be noted, that in some cases, spending on an award may equal acceptance of the award and its terms and conditions.
- c) Awards received: Generally, if an award has been received but is being negotiated, an at-risk account will not be set-up. However, if negotiations are likely to extend longer than 1 month, at-risk accounts will be considered. Please discuss with your SPA AD to determine whether an at-risk account should be created.
- d) Subcontracts out: At-Risk accounts will not be issued for subcontracts out. Under special circumstances, at-risk accounts for subcontractors may be considered and approved only by the Chief Research Administration Officer.
- e) Part-of accounts for departments other than the Primary Managing Org: At risk accounts may be set up at the discretion of the Primary Managing Org. If a part-of account is going to be set up, SPA encourages the department to request a discretionary account from the part-of entity. If a part-of discretionary account is not indicated, the department discretionary account indicated for the department at-risk account will be also used as the default for the part-of.
- f) Length of At-Risk Accounts: Accounts will generally be issued for a maximum length of 6 months, however, monitoring will begin after 60 days. If an extension is required beyond 6 months, please contact your SRA to discuss further.
- g) Amount of At-Risk Accounts: As a guideline, in order to align the % of time with the % of funds, at-risk accounts will be created for up to 50% of the requested budget amount in the first year of the project up to a maximum of \$200,000.
- h) At-risk account monitoring: Monitoring of at-risk accounts will be done by SPA on a monthly basis. See Monitoring Guidelines below.
- i) Refusal: Please note that in cases where the risk is deemed to be too high, SPA reserves the right to refuse to issue a Departmental At-Risk Account.

Standards of Service: Any approved at-risk account request received by SPA will be processed within **5 business days of a complete request including all required department signatures.**



Portfolio owners will *monitor their requests dashboard daily* in order to stay current on pending requests.

Process Steps:

Step	Role	Task/Activity
1	GM	Initiates internal request in GMAS.
2	GM	In the justification box, provides a reason for the at-risk account request. There must be a reference to a sponsor policy (pre-award spending) or a written confirmation from the sponsor that the award will be made. If confirmation, save in the document repository for the request and name it “sponsor award confirmation”.
3	GM	a) In the comments box, enters the following verbiage: In the event the award is not received, the department assumes responsibility for all expenses incurred on the at-risk account. The discretionary account to be charged is < tub.org.fund.activity.subactivity.root >. b) If a part-of at-risk account is being created, include the same verbiage as in a) and indicate the < tub.org.fund.activity.subactivity.root > for the part-of entity. c) Confirms Research Team is accurate and reflects <i>Investigators</i> on the PHS+ sponsored project (in the case of non PHS+ sponsored projects, HU faculty and academic appointments only) and that any TBD investigators/Faculty are added and have disclosed, if known, or if they are to work on the project at risk. Note that the “Confirm Research Team” button will not be available at this time, so insert the comment, “Research Team has been confirmed.” d) Checks for approvals still in “Needed Status” on Segment Home Page (IACUC, COI, Biohazards, PA). Follow up with others to obtain approvals if needed.
4	GM	Routes request in GMAS for signature by AD, PI and Chair or Authorized Department Approver.
5	PI	Reviews request in GMAS and signs.
6	DA/Chair	Reviews request in GMAS and signs.
7	SRA/AD	a) Reviews request and justification from department for adequacy and follows up with sponsor if required. b) Reviews and marks approvals as “done” in GMAS, and updates any additional needed approval information. The at-risk account <i>may</i> be processed with a restriction, depending upon the approval not completed, and the project work. c) AD signs request, in addition to PI and Chair or Authorized Department Approver. d) Emails OPS team requesting at-risk account set-up.
8	OPS	Prepares action memo and sends to department <i>within 5 business days of initial receipt in SPA.</i>

At-Risk Account Monitoring Guidelines:

SPA will monitor at-risk accounts monthly and will seek clarification and appropriate action from the department in the following situations:



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- a) If the at-risk account is greater than 60 days beyond its start date.
 - b) If the actual expenditures exceed the authorized expenditures.
 - c) To determine if the IRB and IACUC approvals have been received (if applicable)

Revision History

10/19/16	Revised to include confirmation of the research team and completion of approvals; see page 2 of the business process, steps 3, 4 and 7.
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