
Overview

This guide explains how At-Risk Accounts can be used to facilitate the initiation or continuation of a sponsored project prior to receiving an award or official notice from the sponsoring agency. The reason for requesting and establishing an At-Risk Account is that one has received notification of a sponsor's intent to fund a proposal, but the issuance of the actual award document by the sponsor may be delayed and an immediate need exists to begin work or continue existing work that benefits the sponsored project.

The establishment of the At-Risk Account provides the Principal Investigator (PI) access to funding by assigning an account number to the sponsored project in advance of receiving the official award document. The advance assignment of the account number aids in the proper assignment of costs at the beginning of the project which prevents the improper allocation of expenses to an incorrect account and further minimizes the need for cost transfers. (A cost transfer is the reassignment of an expense to or from a sponsored project after the expense was initially charged to another sponsored project or non-sponsored project. Cost transfers include reassignments of salary, wages and other direct costs. Refer to [Policy 1305 Cost Transfers involving Sponsored Projects](#) for more information.) As part of the University's efforts to improve research administration processes, PIs are encouraged to use At-Risk Accounts when appropriate.)

Note: All At-Risk Accounts will be monitored by the Office of Sponsored Projects (OSP) to assess continuation of the risk.

Types of At-Risk Accounts

The University permits and supports the use of At-Risk Accounts to assist in the initiation of research projects and in the reduction of the number of cost transfers. There are two types of At-Risk Accounts that may be permitted:

- **Pre-award Account:** The use of a pre-award At-Risk Account allows the charging of expenses on federal and some non-federal sponsored projects up to 90 days prior to the start date of the award at the grantees risk.
- **Late Award Account:** The use of a late award At-Risk Account allows the charging of expenses to a sponsored project prior to the receipt of the award document (e.g., notice of grant award, cooperative agreement or fully executed contract) but not before the anticipated start date of the sponsored project (unless the sponsor specifically allows for pre-award costs).

In both of the situations described above, the department assumes responsibility for all costs not funded by the sponsor. In addition, all required compliance reviews (Conflict of Interest (COI), human/animal subjects' approval) must be completed prior to the establishment of an At-Risk Account.

Compliance Issues

The University does not permit the creation of an At-Risk Account until COI disclosure forms have been submitted and reviewed, and if necessary, any potential conflicts have been reduced, eliminated or otherwise managed for all individuals [listed in Section IV of the Transmittal Summary Form (TranSum) or in the IRES Proposal Development (PD) module's Personnel Tab who are identified by the PI as having the responsibility for the conduct, design, or reporting of the research (PIs and Co-PIs are always considered responsible)]. Similarly, At-Risk Accounts may not be set up if required human, animal and/or biosafety research protocols have not been approved and congruency determined as appropriate.

Note: When informed that an award is likely to be funded, the PI and departmental business support staff should alert OSP and complete and submit all required COI disclosures and any other research compliance protocols to the appropriate regulatory office sufficiently in advance of the award in order not to impede the establishment of either an At-Risk or a regular account.

Requesting an At-Risk Account

When submitting a request for an At-Risk Account there must be evidence that:

- an award is forthcoming and the start date is confirmed; and/or
- there is a need and it is necessary to incur costs prior to the start date of an award and the sponsor permits pre-award costs.

Requests for an At-Risk-Account must be submitted to the appropriate gcat mailbox as indicated below under **Contacts**. The request will be assigned to the appropriate Award or Contract Manager in OSP. In addition to OSP's review, based on a completed request for an At-Risk Account, all compliance issues noted above must be addressed before an At-Risk Account can be set up.

Principal Investigator/Business Checklist

The following checklist is intended to assist the PI and the business office in determining if an At-Risk Account may be established.

- The proposal has been recommended for funding.
- Documentation from the sponsor exists substantiating that the funding is imminent and includes a start date (for example, an email from the Program Officer).
- Does the Sponsor/Agency allow pre-award costs?
(Contact OSP to confirm if pre-award costs are allowable)
- Is this request to incur allowable pre-award expenses?
- Is it expected that the official notice of award or award document will be received after the project start date?

Yale and Sponsor Regulatory Requirements

The University does not permit the creation of an At-Risk Account until all regulatory requirements have been completed, and reviewed and approved by the appropriate regulatory office. An At-Risk Account will only be created if all of the following applicable compliance requirements are met:

- All individuals responsible for the conduct, design, or reporting of the proposed research have a current and up-to-date COI disclosure on file in the COI Office. If this request is to incur allowable pre-award expenses, all related COI disclosures must be current through the anticipated award start date and reviewed by the COI Office.
- All animal protocols are approved and determined to be congruent to the proposal by the Institutional Animal Care and Use Committee (IACUC).
- All human subject protocols are approved and determined to be congruent to the proposal by the Institutional Review Board (IRB).
- All other regulatory compliance requests (biohazards, radiation safety, hazardous material, Patent Policy Acknowledgment and Agreement, etc.) are completed and on file.

How to Request an At-Risk Account

If all of the applicable criteria above have been met, the PI, with the assistance of the business office, may request the establishment of an At-Risk Account, forwarding all appropriate documentation including an [At-Risk Account Request Form 1304FR.01](#) to OSP for further action.

- The completed form requires the signatures of the PI, business manager, and the department chair acknowledging the department’s responsibility for any expenses not subsequently funded by the sponsor.
- The form must be accompanied with supporting documentation relating to the award and forwarded to OSP .
- Once OSP determines the feasibility of a potential award and all appropriate Yale and sponsor regulatory requirements are fulfilled, OSP will sign the At-Risk Account Request form authorizing the sponsored award to be created in the University’s financial accounting system.
- Generally, At-Risk Accounts will be set up for a period not to exceed 180 days in order to provide sufficient time for the award to be received. An At-Risk Account may require modification if the award is further delayed.

Questions regarding the set-up of an At-Risk Account can be directed to the appropriate OSP Award or Contract Manager.

Contacts

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