Resolve at Proposal Stage

Approval	Department responsibility	SPA responsibility
Additional Staff and Space	Mark NO in GMAS during proposal entry	Answer questions, as needed
Administrative Salaries	Mark YES in GMAS for administrative salaries **Procedures Guide** 1. Ensure all required criteria have been met before including admin salaries in a federal proposal budget 2. Demonstrate that the level of support is greater than normal by requesting an appropriate amount of effort. Per University guidance, "generally, a minimum of **20-25%** for most projects or **5%** for training grants is suggested." 3. Ensure that role is not technical (see note below) 4. **In the GMAS approval comment box**, include: **1)** person's name, **2)** project role, **3)** effort level, **4)** justification/need for admin salary request, and **5)** info listed in the budget justification **Note:** If a person's role seems administrative in nature but has technical/programmatic responsibilities on the project, **it is recommended that the PI clearly state this on the budget justification**, so that the GM and SPA reviewers could easily identify if the role is technical or meets the definition of administrative salary. For example, if the person writes publications, attends conferences, manages protocols, etc., including a sentence (such as, "their technical/programmatic duties on this award include…") would be helpful **Resources:** Link to Admin Salaries on Federal Awards. Also see the detailed procedures outlined in Appendix A of the policy	**Detailed Procedures** 1. SRA & AD review approval & budget justification for accuracy 2. Verify that there is a need to direct charge admin salaries (minimum of **20-25%** for most projects or **5%** for training grants), that all required criteria are met, and are consistent with Sponsor & University policies 3. Verify that role is not technical (see department responsibility note) 4. Verify that all **5 items are included in the GMAS approval comment box**: **1)** person's name, **2)** project role, **3)** effort level, **4)** justification/need for admin salary request, and **5)** info listed in the budget justification 5. After SRA & AD determine that the approval is complete and compliant, SRA will notify Administrative Salary Approver (Catalina Diaz) that approval is ready for school-level review **Note: For Non-Federal awards**, SRA can review & approve the admin salaries approval
Animals (IACUC Approval)	Mark YES in GMAS if PI or proposal states that project will involve vertebrate animal research **Note:** IACUC approval letter NOT needed until the Award Stage/JIT	No action from SPA, unless approval is marked as NO but the proposal states that it involves vertebrate animal research
Biohazards/rDNA (COMS Approval)	Mark YES in GMAS if PI or proposal states that project use biohazardous materials **Note:** Biohazard approval NOT needed until the Award Stage/JIT	No action from SPA, unless approval is marked as NO but the proposal states that it involves the use of biohazardous materials
Conflict of Interest (fCOI)	**fCOI Cheat Sheet** and **HSPH Business Process** 1. Update the GMAS Research Team 2. Ensure all Harvard PHS+ investigators have current year's disclosure on file 3. Ensure all non-Harvard PHS+ Investigators have completed an fCOI FORM 4. For subawards: check if institution is an fCOI Clearinghouse participant. If not listed as a participant, ensure investigators have completed an fCOI FORM **Resource:** fCOI Cheat Sheet and List of PHS+ Agencies and GMAS Guidance	Confirm completion and follow-up, if needed

Cost Sharing (voluntary & mandatory): University Contributions, Sponsored Contributions (or Matching Funds), In-Kind, and Subrecipient Cost Sharing. Excludes Over-the-Cap	Mark YES in GMAS for Voluntary & Mandatory (but not Over-the-Cap) **Proposal Stage Job Aid** and **Procedures** and **Policy** 1. Enter the cost sharing commitments in GMAS & ensure the cost share budget includes expenditures that are allowable, allocable, reasonable, and consistently accounted for 2. Include the reason for cost sharing in the **comments section** of the approval and **upload supporting docs** in the approval document repository 3. Notify the **Department Administrator (Job Aid)** to review the approval details, before asking SPA (SRA/AD) to review 4. Notify SRA to review. After SPA review & approval is confirmed, **add Cost Sharing Approver (Catalina Diaz) as a signatory** when locking-&-routing proposal in GMAS **Notes:** • If **salary is being cost shared**, please remember to list the salary and fringe as 2 separate expense categories. Also, dollars entered must tie to the **effort in person months** by period • A **companion account** is required for all committed cost sharing direct expenses associated with a sponsored award and should be coded using a sponsored activity and subactivity value with a non-sponsored fund • When the cost sharing source is another non-federal sponsored fund (i.e. **matching fund**) or **in-kind contribution**, cost sharing must be documented, tracked, and confirmed by the dept. • If there is **CS for a researcher from another Harvard school**, work with their admin team to complete approval (i.e., obtaining CS details, uploading supporting docs, and uploading written CS approval from PI and dept. admin) • If there is **Subrecipient Cost Sharing**, review the resources listed in the link below for detailed instructions **Resource:** **Link to Cost Sharing Policy, job aids, detailed procedures, and FAQs**	**Central Review Job Aid** and **Procedures** 1. **SRA & AD** review the approval for accuracy and ensure that the cost sharing commitments are consistent with Sponsor & University policies 2. Verify that the reason for cost sharing is noted in the **comments section** of the approval and **supporting docs** are uploaded in the approval document repository 3. If allowable & approval is completed accurately, **SRA notifies Cost Sharing Approver** (Catalina Diaz) that the approval is ready for school-level review 4. If compliant, SRA ensures that the GM includes the **Cost Share Approver as a signatory** when locking-&-routing the proposal in GMAS **Notes:** • If **salary is being cost shared**, please make sure the salary and fringe are listed as 2 separate expense categories and dollars entered tie to the effort in person months by period • Ensure that a **companion account** is used for all committed cost sharing direct expenses associated with a sponsored award • If there is **CS for a researcher from another Harvard school**, follow the steps above and ensure that **written approval from PI and dept. admin** are uploaded to the doc repository
Debarment – subs	Enter potential subrecipient Institution into GMAS and manage communication between SPA/Institution	Check **SAM.gov**: 1. Verify the Institution is not disbarred on **Sam.gov** and include the Sam.gov Entity info in the approval comment box 2. If Institution is not registered in SAM, notify department so they can have the Institution register before the award begins

Foreign/Overseas	Mark YES in GMAS for:
	  1. Foreign Sponsor
	  2. Foreign Subcontract
	  3. Overseas Field Site
	  4. Fogarty Grant
		TBD – working group in process per M.S.

Harvard's Name	Mark YES in GMAS if "Harvard" is used in the title of the project and contact Eileen Nielsen to get approval, upload to GMAS	SRA will follow up with Eileen as needed.

Human Subjects (IRB Approval)	Mark YES in GMAS if PI or proposal state that the project involves human subject research **Note:** IRB approval letter NOT needed until the Award Stage/JIT	No action from SPA, unless approval is marked as NO but the proposal states that it involves human subject research
Interfaculty Involvement	Complete Interfaculty Involvement (IFI) section in GMAS and obtain written tub/org approval from the PI AND ADF of the collaborating department for faculty effort and willingness to initiate a part-of account. Tub should approve by signing GMAS request, Org can approve via email, which should be uploaded to GMAS. **Note:** "Tub" implies that there is IFI from a different school within the University. "Org" implies that there is IFI from a different department with Harvard Chan School. **Resource:** Link to GMAS IFI Job Aid	SRA verifies that the IFI section in GMAS was completed accurately and that the written approval from PI AND ADF of the collaborating department is obtained & saved in the GMAS request document repository. **Note:** For IFI across the university (different Tub), it will require the collaborating AD's approval/signature. For IFI within the HSPH (different department/Org), it will not require the collaborating AD's approval/signature
Participation Agreement	Update Research Team and review Approvals section to see if any personnel have signed their PA. Harvard personnel should sign via Harvard Key. Visitors should sign the visitor PA.	SRA checks that all personnel conducting research at Harvard have signed a PA. Subcontract personnel are not required to sign a Harvard PA.
Stem Cells	** No action necessary. Typically, this approval is at HMS, not HSPH ** If project does involve stem cells research, PI must work directly with ESCRO. Melissa Lopes is the ESCRO Administrator escro@harvard.edu	** No action necessary. Typically, this approval is at HMS, not HSPH **

Resolve at Award Stage/JIT

Approval	Department responsibility	SPA responsibility
Animals (IACUC Approval)	Obtain the IACUC approval letter from the PI and verify that the project title and award # appear on the approval. When complete, upload a copy of the approval letter in the GMAS approval document repository. If the project title & award # are NOT listed in the approval letter, ask the PI to work with the IACUC office to have the project reviewed and added to the approval (usually done via a new protocol or an amendment to an existing protocol). **Note:** IACUC approvals expire after 3 years. **Resource:** IACUC Protocol Validation Flowchart	Update approval with dates/status
Administrative Salaries	**If there are changes** to this approval throughout the life of the award, please inform your SRA and follow the instructions listed in the **Procedures Guide** and *Resolve at Proposal Stage* chart above **Note:** Depending on the award terms & conditions, Sponsor Prior Approval may be required	**If there are changes** to this approval throughout the life of the award, follow the instructions listed in the **Procedures Guide** and *Resolve at Proposal Stage* chart above
Biohazards/rDNA (COMS Approval)	If the project includes biohazards or recombinant DNA, the department (GM/PI) should contact biosafety@harvard.edu	Confirms that the department/GM has reached out to the Biosafety Office

	Note: After their review, the [Biosafety office](#) will update the approval in GMAS	
Conflict of Interest (fCOI)	[fCOI Cheat Sheet](#) and [HSPH Business Process](#) 1. Update the GMAS Research Team 2. Ensure all Harvard PHS+ investigators have current year's disclosure on file 3. Ensure all non-Harvard PHS+ Investigators have completed an fCOI [FORM](#) 4. For subawards: check if institution is an [fCOI Clearinghouse](#) participant. If not listed as a participant, ensure investigators have completed an fCOI [FORM](#) **Resource:** [fCOI Cheat Sheet](#) and [List of PHS+ Agencies](#) and [GMAS Guidance](#)	If any status appears other than "No interests" or "Reviewed" check with Angela Brazeau
Cost Sharing (voluntary & mandatory): University Contributions, Sponsored Contributions (or Matching Funds), In-Kind, and Subrecipient Cost Sharing. Excludes Over-the-Cap	[Award Stage Job Aid](#) and [Procedures](#) and [Policy](#) 1. After the 1st sponsor notice is logged in GMAS, the Cost sharing approval status will be set to "Needs Review" 2. Review sponsor notice & determine if there have been any changes in the proposed cost sharing commitments, amounts, funding source (i.e., different acct string), and/or type 3. If **NO CHANGES**: click the **Actions** button in the approval and select "Confirm this version of the form" 4. If **CHANGES**: click the **Actions** button in the approval and select "Create a new version of the form." This will create a new GMAS request 5. **Complete the request:** include a justification, complete the CS form, upload supporting docs in the document repository, and record additional comments (if needed) 6. Notify the [Department Administrator (Job Aid)](#) to review the request details, before asking SPA (SRA/AD) to review 7. After Dept. Admin review, notify SRA to review. After SPA review & approval is confirmed, **add Cost Sharing Approver (Catalina Diaz) and ADF as signatories** when locking-&-routing GMAS request **Revision during Award** 1. If there are changes to the cost sharing commitments, amounts, funding sources, and/or type, create a new GMAS request -> **select Cost Sharing and follow steps 5-6 (outlined above)** 2. If cost sharing is a new requirement and it was not included in the original proposal, inform SRA of change and to follow the steps in the [Revision Job Aid](#) **Notes:** • **Cost Sharing request can be triggered when**: **1)** 1st sponsor notice is logged in GMAS, **2)** dept/SPA flags the Cost Sharing form for review, **3)** the Cost Sharing question on a Continuation or Supplement request is answered "Yes" on a segment that already has cost sharing identified • If **salary is being cost shared**, please remember to list the salary and fringe as 2 separate expense categories. Also, dollars entered must tie to the **effort in person months** by period • A **companion account** is required for all committed cost sharing direct expenses associated with a	[Central Review Job Aid](#) and [Procedures](#) 1. **SRA & AD** review sponsor notice & determine if there have been any changes in the proposed cost sharing commitments, amounts, funding sources (i.e., different acct string), and/or type 2. If **NO CHANGES**: no further action needed 3. If **CHANGES**: SRA & AD review the changes in the request for accuracy and ensure that the cost sharing commitments are consistent with Sponsor & University policies 4. Verify that **the justification and CS form** are completed accurately, **additional comments** are recorded (if needed), and **upload supporting docs** are uploaded the approval document repository 5. If allowable & approval is completed accurately, **SRA notifies Cost Sharing Approver** (Catalina Diaz) that the approval is ready for school-level review 6. If compliant, SRA ensures that the GM includes the **Cost Share Approver and ADF as signatories** when locking-&-routing the GMAS request [Revision during Award Job Aid](#) 1. If there are changes to the cost sharing commitments, amounts, funding sources, and/or type, create a new GMAS request, **follow steps 3-6 (outlined above) and the details in the Revision Job Aid** **Notes:** • If **salary is being cost shared**, please make sure the salary and fringe are listed as 2 separate expense categories and dollars entered tie to the effort in person months by period • Ensure that a **companion account** is used for all committed cost sharing direct expenses associated with a sponsored award • If there is **CS for a researcher from another Harvard school**, follow the steps above and ensure that **written approval from PI and dept. admin** are uploaded to the doc repository

	sponsored award and should be coded using a sponsored activity and subactivity value with a non-sponsored fund • When the cost sharing source is another non-federal sponsored fund (i.e. **matching fund**) or **in-kind contribution**, cost sharing must be documented, tracked, and confirmed by the dept. • If there is **CS for a researcher from another Harvard school**, work with their admin team to complete approval (i.e., obtaining CS details, uploading supporting docs, and uploading written CS approval from PI and dept. admin) • If there is **Subrecipient Cost Sharing**, review the resources listed in the link below for detailed instructions **Resource:** Link to Cost Sharing Policy, job aids, detailed procedures, and FAQs	
Debarment – trainees	1-Check SAM.gov 2-Make a comment that SAM.gov was checked	Review comment made by department and then marks as DONE
Human Subjects (IRB Approval)	Verify that GMAS approval is complete. When the proper IRB approval is in place with the IRB office, ESTR will link the approval in GMAS and auto-populate the required information. If the information hasn't linked in GMAS, ask the PI to work with the IRB office to have the project reviewed and added to the approval. **Note:** IRB approvals expire after 1 year. **For federal awards.** Human Subjects Training, for people working on HS, will be needed as part of the JIT submission.	No SPA action required. When the proper IRB approval is in place with the IRB office, ESTR will link the approval in GMAS and auto-populate the required information
Participation Agreement	Update the GMAS Research Team and review the Approvals section to see if any personnel have signed their PA. Harvard personnel should sign via Harvard Key. Visitors should sign the visitor PA	SRA checks that all personnel conducting research at Harvard have signed a PA. Subcontract personnel are not required to sign a Harvard PA.
Program Income	Mark YES in GMAS. Complete Program Income section including amount and source	SRA checks form is complete (i.e. for conference grants). Mark done.
Stem Cells	** No action necessary. Typically, this approval is at HMS, not HSPH ** If project does involve stem cells research, PI must work directly with ESCRO. Melissa Lopes is the ESCRO Administrator escro@harvard.edu	** No action necessary. Typically, this approval is at HMS, not HSPH **