

SOM Pre-Award Request Process:

ORA Guidance for Departments/Divisions

Requesting a pre-award account *may* be appropriate when a PI needs to begin work on a project prior to receipt of a fully executed agreement or award document, or in advance of the start date of the project.

Many federal agencies allow pre-spending within 90 days prior to the start of an award, when spending is necessary and allowable towards the development of the project; for example, to purchase equipment or hire staff that are crucial to kickstarting the project. For non-federal sponsors, please check their policies, the award terms, or contact the sponsor directly to confirm whether or not pre-spending is allowed.

Considerations

- The department/division assumes all risks associated with spending in advance of an award.
- The existence of a pre-award account does not obligate the sponsor to fund an award, nor is it a guarantee of funding.
- If the award does not materialize, any expenses incurred will need to be covered by a non-sponsored department/division account.

It is strongly recommended to discuss your intent to request a pre-award account with your ORA Grants or Contracts associate, *prior* to submitting the pre-award request in Fibi. This ensures that the department and division are not spending time preparing a Fibi submission request that ORA cannot approve. ***Please note that ORA will not conduct pre-reviews of pre-award requests.***

Pre-Award accounts are prohibited for the following agreement types:

- Commercial clinical research
- SBIR/STTR awards
- Awards that already have an SAP grant number
- Awards where a key person has a Financial Conflict of Interest (FCOI)
 - Department/Division should confirm FCOI status by reviewing Q_1078 of Fibi PD key personnel certification(s) prior to submitting a pre-award request.
 - If anyone listed as key personnel on the project has indicated that they have a financial conflict of interest related to the project (Fibi PD question number Q1078), a pre-award request will not be approved.

Requirements for Requesting a Pre-Award/Pre-spend Account:

1. **Sponsor policy allows pre-spending.**
The sponsor must have language/a policy that allows pre-award spending. Department/Division must include documentation from the sponsor (e.g., policy on the sponsor's website or confirmation email from the sponsor) that pre-award spending is permitted.
2. **Proof of anticipated sponsor funding** (for NIH, a JIT request applies).
Ex: partially executed (PE) agreement, written statement from the sponsor of the intent to fund the award, and/or an email from the JHU sponsor/pass through entity prime confirming the intent to issue a subaward to JHU (subawards only).
3. **Proof of non-sponsored account to cover pre-award costs.**
Department/Division is required to provide a non-sponsored account /internal order (IO) number that will be used to cover the pre-award costs should the funding not materialize.
4. **An Approved Fibi PD record with an Institute Proposal Number.**
Pre-award requests are generated from the Fibi IPN, so the Fibi PD record must be approved before a pre-award Service Request can be submitted to ORA.
5. Excluding NIH, **dates for the pre-award account should be within the anticipated project dates or within the allowed pre-award period.**
For NIH, dates cannot be more than 90 days prior to the anticipated award date.
6. **Grants only: All regulatory (IRB, IACUC, etc.) protocols that support the project have been approved**, if applicable.
 - a. Exceptions may be made for extenuating circumstances or delayed onset projects. These instances will be reviewed by ORA on a case-by-case basis. Approval shall be at ORA's sole discretion and in compliance with JHU and sponsor policies.
7. **A signed PI/Dept pre-award request acknowledgement form** has been uploaded to the Pre-Award Service Request (see page 4).

Continued on next page.

Requirements for Fibi:

Pre-Award Account Requests are initiated and approved via the Fibi Pre-Award Service Request.

1. Explain in detail the need for the request and what tasks will be initiated should a pre-award account be setup.
2. Upload to the comments section in Fibi:
 - PI and Departmental/Divisional written acknowledgement form that they understand the financial and compliance risks to the department/division of a pre-award account.
 - The non-sponsored IO that will cover any unallowable expenses. If the non-sponsored IO is not included in the comments section, the request will be rejected back to the department/division.
 - Protocol information (for grants), if applicable.

Incomplete requests will be returned. Barring any missing documentation, requests are generally approved within two (2) business days. Once ORA approves, the request is forwarded on to Sponsored Projects Shared Services (SPSS) for approval and pre-award account setup. Should you have questions regarding the status of your request following ORA approval, please follow up with SPSS.

Post-Approval Process:

- The department/division administrator or Grants & Contracts Analyst (GCA) must forward the final award documents to ORA.
- Once award documents are received and finalized, ORA will upload them into Oculus so that SPSS can convert the pre-award account to a funded award account.
- If the award does not materialize, departments will need to work directly with SPSS to transfer any expenses to a non-sponsored IO.
- Departments/divisions are responsible for tracking and managing all expenses on pre-award accounts and following up with the sponsor regarding the agreement status until it has been fully executed.

PI and Department/Division Pre-Award Request Acknowledgment Form

By submitting a pre-award request, the PI and authorized department/division representative understand and agree to assume all financial and compliance risks associated with the setup of a pre-award account, including, but not limited to the following:

- The department/division assumes all risks associated with spending in advance of an award.
- The existence of a pre-award account does not obligate the sponsor to fund an award, nor is it a guarantee of funding.
- If the award does not materialize, any expenses incurred will need to be covered by a non-sponsored department/division account. The department/division will be responsible for working directly with Sponsored Projects Shared Services (SPSS) to overrun any expenses to a non-sponsored internal order (IO).

PI signature & date

Department/division signature & date

PI name:

Fibi PD # for the submitted proposal: