



Albert Einstein College of Medicine

## Carryover Policy

### I. Purpose

The purpose of this Policy is to outline requirements for unspent carryover of funds at Albert Einstein College of Medicine (“Einstein” or “College of Medicine”)

### II. Scope

Within all Albert Einstein College of Medicine departments, the following must comply with this policy:

- All Principal Investigators (PIs) and Project Directors (PDs)
- Departmental Administrators and other departmental staff
- Deans and Department Chairs
- Research Finance (RF)
- Office of Grant Support (OGS)
- Central Administration

### III. Policy

#### III.A. Policy Statement

When funds awarded for a specific budget period have not been spent by the end of that budget period, some sponsors allow unspent funds to be carried over into the next budget period. Not all sponsors allow carryovers and/or, they may require prior written approval before the funds can be available for spending. Policies vary within different agencies and programs. Be sure to check with your sponsor for applicable procedures.

If a sponsor requires written approval to carryover funds, then the department needs to draft a letter requesting prior approval to carry over the funds, and your financial analyst should review and approve the request.

Large unspent balances run the risk of being lost. At the discretion of the sponsor, they may withhold approval or approve only part of the request. In some instances, sponsors have approved the carryover but then reduced the award amount for the next budget period by the amount of the previous unspent balance. The procedures below describe handling funds remaining at the end of a budget period that a PI or PD wishes to carryover for expenditures in the next budget period.

### III.B. Roles & Responsibilities

**Principal Investigators (PIs)** - It is the responsibility of the PI/PD to initiate the carryover process.

**Departmental Administrators** – It is the responsibility of the Department Administrator to assist the PI/PD with carryover requests. Each Einstein department is structured differently. For the purposes of this document, we are referring to the individual assigned to aid the PI/PD with carryover requests as the Department Administrator. However, the title of the Department Administrator in each department may differ from time to time. Please note NYS carryover process is different and needs to go through the Office of Grant Support (see section III.D).

**Research Finance (RF)** – It is the responsibility of the RF office to coordinate the carryover requests. RF double checks the budget calculation and is responsible to reduce the budget in Banner while the carryover request is with the sponsor. Once the sponsor approves, it is the responsibility of the RF office to update the budget in Banner as well as adding the documents in to Cayuse SP.

### III.C. NIH Procedure

#### Department Administrator

- Checks the sponsor agreement or contract for allowability of carryover and sponsor stipulations (Appendix 1). eRA Commons stipulations include:
  - NIH requests must match the final Federal Financial Report (FFR) unless there is a determination that all remaining funds are not required in the subsequent budget period.
  - Final reports submitted with remaining balance. (Final Progress Reports or FFR).
  - Anticipated projections of final expenditures submitted in advance of final report (FFR).
- If approval is required, reviews the budget and projects award balance to the end of the budget period or refer to the unobligated balance on the FFR.
- Follow or use the Carryover Request Sample (Appendix 5) to request a carryover.
- Write an email to [Denise Giocondo](#) requesting the carryover with the letter attached. The email must follow the OPAS–carryover procedure.
  - Denise will review, approve, and upload the document into Cayuse SP.
  - Denise will submit the carryover request to the sponsor.

#### Research Finance

- Upon submission of the FFR, RF will decrease the budget to match the expenses reported to the sponsor.
- Reviews the carryover request letter to the sponsor and attachments.
- Finance Director co-signs the letter.
- Receives sponsor's approval via revised NOA and notifies the department.
- Coordinates the budget approval in Banner and codes in Banner with rule code BD02.

### III.D. New York State Contracts

#### Department Administrator

- Obtains final voucher from Research Finance/ Research Finance will include Gerard McMorrow at OGS in the final report submission.
- Gerard will be alerted that the request has a truncated timeframe for submission.
- Use form(s) (Appendix 3 and 4) to calculate carryforward (carryover) balance. Complete all forms in spreadsheet, including the justification.
- Have the PI/PD sign the face page (if requested).
- Follow the OPAS guidelines and attach to the policy as an Appendix 2.
- Office of Grant Support will review and approve it. Then, Department Administrator forward it to NYS contract specialist.
- If there are variances, one must submit the budget modification first before proceeding (Fill out the form, Appendix 4) with the steps above.
- Please note that approval notifications are not uniform. The person in charge at the state agency may notify the approval in an email or may request to make the change in Grantsgateway. If this is the case, the modification will be made, and the signatory authority the OGS director, [Dhanonjoy Saha](#), will need to approve it in Grantsgateway.
- There is no notification mechanism. The Department Administrator should alert the OGS director, [Dhanonjoy Saha](#), to review and approve the request in Grantsgateway once it is approved by the state agency contract specialist.

#### Office of Grant Support

- Budget analyst at OGS, [Gerard McMorrow](#), reviews the request from the department administrators.
- The OGS director, [Dhanonjoy Saha](#), approves the request in Grantsgateway if the state agency adds this into Grantsgateway.

### III.E. All Other Sponsors Procedure (Non-NIH) including Incoming Subcontracts

#### Department Administrator

- Checks the sponsor agreement or contract for allowability of carryover and sponsor stipulations.
- Follow sponsor guidelines to request carryover.
- Follows up with sponsor regarding the permission.
- Once approved forward to [Denise Giocondo](#) at RF.

#### Research Finance

- Upon submission of the final invoice, RF will decrease the budget to match the expenses reported to the sponsor.
- If carryover is approved, RF will coordinate the budget approval in Banner in the new grant number. RF uses rule code GRCA.

III.F. References

[Sponsor Prior Approval Policy, FIN-POL-2019-027](#)

**IV. Definitions**

None.

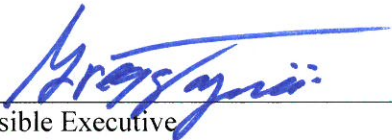
**V. Effective Date**

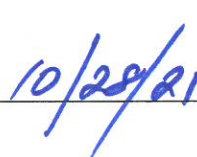
Effective: 28 October 2021

**VI. Policy Management and Responsibilities**

The Responsible Office under this Policy is the Finance Department. The Associate Dean for Administration and Finance is the Responsible Executive, and the CFO is the Responsible Officer for this Policy.

**VII. Approved (or Revised)**

  
Responsible Executive

  
Date

## Appendix 1: NIH Grants that Do Not Allow Automatic Carryover of Funds Guide

**NOTE: This guide should be used prior to RPPR or while submitting the RPPR**

NIH grants that do not typically allow automatic carryover each year are: the U series (e.g., U01, U10, U19, U24, U54, UC2, UM1), P30, P50, and P60 as well as other select P-series awards. Carryover of unobligated balances for these grants requires NIH prior approval unless otherwise noted in the Notice of Awards (NOAs). Other awards may also not allow automatic carryover of funds through a special term or condition in the NOAs. Please check the NOA for a clause such as “Carryover of an unobligated balance into the next budget period requires Grants Management Officer prior approval.”

We have had recent cases of the NIH using prior year’s carryover funds to offset a future year’s award, which means a loss of grant funding. Example: The unobligated balance on Y1 is \$100,000. Y3 award amount is \$500,000. The NIH awards Y3 using \$400,000 of Y3 funds and \$100,000 of Y1 funds. The project loses \$100,000.

Strategies to minimize the risk of NIH from using an unobligated balance from a prior year to offset a future year’s award.

- 1) Spend the award in a timely manner and encourage your subawards to do the same. In adherence to the sponsored cost principles policy.
- 2) If it is anticipated that an estimated unobligated balance (including prior year carryover) will be greater than 25% of the current year’s total approved budget, you must use section G.10 in the RPPR to justify. Explain when you plan to spend the funds.

Example: Project in Y1; Submitting RPPR for following year, Y2.

The estimated total cost unobligated balance (including prior year carryover) is estimated at \$125,000 or 28% of the current year’s total budget. Patient recruitment this year, Y1 of the study, was delayed due to the FDA hold on the drug. An estimated total cost amount of \$125,000 including funds for personnel time/effort, patient care costs and subject reimbursements, from the current year’s budget remains unobligated due to this delay. We anticipate increasing enrollment and using the unobligated balance funds as budgeted for patient recruitment in year 3.

- 3) If it is anticipated that an estimated unobligated balance (including prior year carryover) will be less than or equal to 25% of the current year’s total approved budget

and

If there are actual or anticipated delays, please use section F.2 of the upcoming RPPR to describe the delays and your plans to resolve them. Include a justification of the unobligated balance in this section.

Example: Project in Y1; Submitting RPPR for following year, Y2.

Patient recruitment this year was delayed due to the FDA hold on the drug. An estimated total cost amount of \$100,000 including funds for personnel time/effort, patient care costs and subject reimbursements, from the current year's budget remains unobligated due to this delay. We anticipate increasing enrollment and using the unobligated balance funds as budgeted for patient recruitment in year 3.

- 4) For projects with subawards, please obtain:
  - a. A budget and budget justification for the carryover amount, and
  - b. Confirmation in writing (e.g., e-mail confirmation) from the Authorized Organization Representative (AOR) that the budget and budget justification is approved.

Regarding the actual carryover request you submit to NIH, below is additional advice and instruction:

- 1) You can submit the request, which consists of a cover letter (or cover e-mail), budget and budget justification, after the FFR has been submitted, into the year you want the funds carried in to. We encourage the request is sent immediately after the FFR has been submitted.
- 2) Use the Carryover Request Sample (appendix 2).

NOTE: The request can only be for the amount you plan to use. Please specify the total cost carryover amount, the budget period the amounts are from, and how much you plan to use.

Example: There is a total cost carryover of \$50,000 from Y1 and an additional total cost carryover of \$55,000 from Y2. The total cumulative carryover amount is \$105,000. You anticipate spending \$40,000 from Y1 carryover funds in Y3. Include these details and prepare a budget for \$40,000.

- 3) Include a detailed budget and budget justification only for the carryover you plan to use and do not duplicate costs that are already included in the current year's budget. Example: You budgeted 100% of Research Coordinator "A" in the current year's budget. Do not budget for 100% of Research Coordinator "A" in the carryover request budget. If you budget for Research Coordinator "B," make sure you justify how that role is different from Research Coordinator "A" in the carryover justification.
- 4) Submit the carryover request to Denise Giocondo (Denise.Giocondo@einsteinmed.org).
  - a. Only the Authorized Organization Representative (AOR) can submit to NIH.

## Appendix 2: Guidelines for Other Pre/Post Award Submissions (OPAS) New Cayuse (Cayuse SP), January 14, 2021

OPAS is an Einstein term used to classify action required post proposal submission. Other than Just-In-Time (JIT), it applies to pre-award status. It also applies to awarded sponsored funds.

Types OPAS:

OPAS Type	OGS Responsible Party
Post Submission Additional Material(s)	Regina Janicki
No Cost Extension (NCE)	Regina Janicki
Title change	Regina Janicki
Budget Modifications/Re-budget	Gerard McMorrow
Carryover request	Denise Giocondo
Face page – to be signed	Gerard McMorrow
Statement of Intent- to be signed	Gerard McMorrow
Compliance Requirement – IACUC or IRB	Regina Janicki
Any other change or modification	Regina Janicki
Any update	Regina Janicki
Changing the funding opportunity	Regina Janicki
Withdraw application	Regina Janicki
Relinquishing Statement (RS)	Denise Giocondo/Regina Janicki
Final Invention Statement (FIS)	Regina Janicki
Other	Regina Janicki

OPAS Procedure - The OPAS routing procedure **doesn't** take place within new Cayuse.

### Administrator takes the following actions:

- 1) Any applicable documentation, including sponsor's original request or draft document(s) should be uploaded to the SP Proposal. document type = OPAS. Please title the document using OPAS Types listed above. If there isn't an SP record, please see Legacy-OPAS instructions below.
- 2) Emails OGS with the subject "OPAS-20-XXXX [Proposal #]-Proposal Type [from the list above]-Sponsor due date.
  - a. The email body should include the following:
    - i. If not in the subject:
      1. Proposal #
      2. Proposal Type
      3. Sponsor due date

- ii. PI name
- iii. Describe the OPAS requested action

**OGS/RF takes the following actions:**

- 3) Reviews the request.
- 4) OGS/RF will suggest any edits.
- 5) If approved, OGS/RF will either send this to the Administrator or the Sponsor, depending on the administrator's request. If OGS/RF is sending it to the sponsor, then OGS will send the request to the sponsor and copy the PI and Administrator, if requested.

**Administrator takes the following actions:**

- 6) Once OGS/RF notifies that the OPAS is approved. The Administrator can proceed with communicating it to the sponsor which may include downloading the signed document(s) from Cayuse SP.

**Legacy OPAS:**

- 7) Follow steps 1 - 5.
  - a. Step #1 has a modification. If there isn't an SP record, a new proposal must be created with the proposal type. Selects Legacy JIT/OPAS from the dropdown list. Then the administrator downloads the Cayuse S2S (formerly Cayuse 424) application, saves and uploads it as an attachment.

**NOTE:** Since the proposal will not be routed, you do not need to populate all the required fields.



### Appendix 3: Carry Over Request – Justification

Organization: Albert Einstein College of Medicine

Contract Number: \_\_\_\_\_

Contract Term (months): \_\_\_\_\_

Budget Period Ending (date): \_\_\_\_\_

Requests are due no more than 45 days after the end of the contract year.

Justification - Explain why all the funds were not expended during the current budget year. State the reasons it is necessary for the unexpended balance to be carried forward. Specifically, why is it necessary to achieve the approved research aims? Describe steps that will be taken to use the funds during the new annual budget year and reduce the need to request additional carry-over funds or a no-cost extension. If necessary, use additional pages.

## Appendix 4: Budget Modification Request - Justification

Organization: Albert Einstein College of Medicine

Contract Number: \_\_\_\_\_

Contract Term (months): \_\_\_\_\_

Budget Period Ending (date): \_\_\_\_\_

Justification – Briefly justify the proposed budget changes. Indicate whether these changes affect the specific aims of the project. If a category is reduced, explain how project goals can still be met. If necessary, use additional pages.

## Appendix 5: Carry Over Request Sample

### Sponsor Carryover Request

Date: \_\_\_\_\_

NAME: \_\_\_\_\_

(This is the GMS = Grants Management Specialist, copy to the Program Officer)

National Institutes of Health

XXXXXXXXXXXXXXXXXX

City, State Zip

Email: XXXXX@XXX

Re. Carryover Request

Grant #: \_\_\_\_\_

Title: \_\_\_\_\_

PI: \_\_\_\_\_

Dear GMS,

This is a carryover request for Grant # EM W-XXX-CA-XXXX, from Albert Einstein College of Medicine.

1. A statement with the amount for the carryover and from Year -XX (the most recent FFR) to Year-XX.
  - a. NOTE: if you aren't requesting the full unobligated balance, include a justification why and a statement that you may request this amount in the future.
2. The reason that the funds requested for carryover were not expended in the year they were awarded.

We appreciate your consideration of this request. Should you have any programmatic questions, please contact the Principal Investigator/Program Director \_\_\_\_\_ at XXX-XXX-XXXX or email [XXX@einsteinmed.org](mailto:XXX@einsteinmed.org). If you have any financial questions, please contact the financial officer, Suzanne Locke, at 718-430-2688. Please email your approval to [suzanne.locke@einsteinmed.org](mailto:suzanne.locke@einsteinmed.org) or mail to Albert Einstein College of Medicine, 1300 Morris Park Ave., Belfer/1108E, Bronx, NY 10461.

Sincerely,

\_\_\_\_\_  
XXXXX  
Principal Investigator/Program Director

\_\_\_\_\_  
Suzanne Locke  
Director – Research Finance

**Be sure to include the following attachments:**

- Budget and justification in [PHS 2590 Detailed Budget Page Form Page 2](#) reflecting the requested direct costs. (If sponsor specifies, you may use PHS398 or SF424)
- Provide an F&A breakdown in the form of the [PHS 2590 Form Page 6 checklist](#).
- If requested*, attach Einstein's federally negotiated rate agreement.
- If requested*, attach the FFR.