HARVARD
UNIVERSITY

Procedures for NRSA Childcare Cost Set-up and Reimbursement

Created: July 2023

Responsible Office: Office for Sponsored Programs

Introduction

Departments or local units are responsible for communicating to Harvard trainees and fellows the details of availability, eligibility, necessary backup documentation, and instructions for requesting childcare funds as outlined in these procedures.

Procedures are divided into two sections: one for NRSA Fellowships and one for NRSA training grants. Although there may be similar information in both sections, there is an important distinction in how these funds are awarded to the institution. Please refer to the Program Announcement and check with your department/local managing unit for additional information.

Proposal and Award

NRSA Fellowships (e.g., F30/F31/F32)

For households where both parents are NRSA fellows, each parent is eligible to receive $2,500 per budget period.

Applicants and recipients may request the NRSA childcare costs as part of new applications (Type 1), continuation applications (Type 5), or as an administrative supplement request (Type 3).

Documentation Requirements

The government requires grantee institutions to maintain documentation, including proof of childcare facility licensure. Ensure a TIN or license number is on the invoice, receipt, or other supporting document. These types of payments are considered nonqualified (taxable) payments to individuals and must be processed to meet tax reporting withholding requirements to the individual. These should not be processed as a nonemployee reimbursement, but instead be processed following the *Processing*

Childcare Costs matrix, specifically following the instructions in the rows for nonemployee individuals that are Monthly External Postdocs (stipendee) (MEP), or Monthly Student Stipends (MST) pay groups.

See General Fellowship Information Brochure which explains the tax reporting requirements to the recipient if processed as a fellowship and not as additional compensation.

Requests for childcare reimbursement must be submitted in a timely manner and must include the following documentation:

1) Childcare Costs Reimbursement Form
   a. For trainees paid a monthly stipend by Harvard, this form must be retained locally. Local units may use GMAS to retain documentation.
   b. For payment requests through B2P for trainees not paid a monthly stipend by Harvard, the form must be uploaded into B2P and may act as the invoice for the reimbursement.
2) Childcare invoice or tuition statement that includes
   a. the service dates of the childcare costs, and
   b. the current license number of the provider
      If the license number does not appear on the invoice or tuition statement, the Massachusetts Department of Early Education and Care (DEEC) has an online directory of licensed providers to search for a current license number. A screenshot or PDF of the website with the provider's current license number is acceptable.

Object codes to use when processing reimbursement

These payments are processed as fellowships and grants. Please use the Office of the Controller's *Processing Childcare Costs* matrix, specifically following the instructions in the rows for nonemployee individuals that are MEP or MST pay groups to identify the appropriate object code for reimbursement. This document can also be found under the "Resources" section of the "NRSA Childcare Costs Guidance."

Processing Reimbursements for Childcare Allowance

Eligible fellows must request reimbursement through their department/local level managing unit.

Please note that in the appendix of the Business Expense Reimbursements Policy, there is a table with a reference to childcare not being allowed on sponsored funds. This reference to childcare is separate and distinct from Childcare Allowance. If a Childcare Allowance has been awarded through an NRSA

fellowship, the NRSA Childcare Costs Guidance is applicable, and those costs may be reimbursed from an NRSA Fellowship Award.

NRSA Training Grants (e.g., T32, T34, T35)

For households where both parents are eligible full-time predoctoral or postdoctoral NRSA trainees, each parent is eligible to receive $2,500 per budget period.

For childcare costs to be considered allowable, eligible full-time predoctoral or postdoctoral NRSA trainees must be appointed to the NRSA institutional research training award prior to use of the childcare costs.

Childcare costs on training grants do not need to be requested at the time of proposal. The costs will be provided automatically in the budget at the time of award based on the number of trainee slots, unless otherwise specified on the notice of award. If awarded, a separate subactivity for childcare costs will be set up in GMAS for each training grant budget period. This subactivity will be assigned an overhead rate of 0%.

Timing Considerations

To maximize the benefit, trainees must request reimbursement of allowable childcare costs prior to submission of the final financial deliverable for the budget period, usually 90-120 days after the end date of the budget period.

Documentation Requirements

The government requires grantee institutions to maintain documentation, including proof of childcare facility licensure. Ensure a TIN or license number is on the invoice, receipt, or other supporting document. These types of payments are considered nonqualified (taxable) payments to individuals and must be processed to meet tax reporting withholding requirements to the individual. These should not be processed as a nonemployee reimbursement, but instead be processed following the *Processing Childcare Costs* matrix, specifically following the instructions in the rows for nonemployee individuals that are MEP or MST pay groups.

See General Fellowship Information Brochure which explains the tax reporting requirements to the recipient if processed as a fellowship and not additional compensation.

Requests must be submitted in a timely manner and additional documentation for reimbursement must include:

1. Childcare Costs Reimbursement Form
   a. For trainees paid a monthly stipend by Harvard, this form must be retained locally. Local units may use GMAS to retain documentation.
   b. For payment requests through B2P for trainees not paid a monthly stipend by Harvard, the form must be uploaded into B2P and may act as the invoice for the reimbursement.
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Processing Reimbursements for Childcare Allowance

Eligible trainees must request reimbursement through their department/local level managing unit.

Please note that in the appendix of the Business Expense Reimbursements Policy, there is a table with a reference to childcare not being allowed on sponsored funds. This reference to childcare is separate and distinct from Childcare Allowance. If a childcare allowance has been awarded through an NRSA Training Grant, the NRSA Childcare Costs Guidance is applicable, and those costs may be reimbursed from an NRSA Training Grant.

Revision history

July 2023: Guidance, Procedures, and Form created. Processing Childcare Costs Matrix updated.