Frequently Asked Questions Related to
COVID-19 and Federal Sponsored Awards

Updated by NMT as of April 27, 2020

Contents

5. If an individual is unable to return home immediately because of travel restrictions due to COVID-19, can their salary continue to be charged to a grant while they are awaiting the lifting of travel restrictions or the availability of transportation? Does it matter if they are able to work on the grant (e.g., telecommuting activities) or not?
6. If a researcher chooses to travel related to their work (e.g., to fulfill a grant responsibility such as present a paper or attend a meeting to discuss research) despite the NMT's suspension of non-essential travel, can salary still be charged to the award – even if they need to stay on travel longer than originally anticipated?
7. Can salary continue to be charged if a researcher is on a multi-day self-isolation or self-quarantine period? Does it matter if the researcher is able to continue to work on the project from the self-isolation or self-quarantine site (e.g., home or designated facility) or is not able to work (e.g., because the work must be done in a wet lab or field site?). Does it matter whether the isolation is self-imposed, institution-imposed, or government-imposed?
8. If schools or eldercare facilities close, can award-funded employees stay at home to do child-care and eldercare and still charge their salary to a grant?
9. If the agency program officer or grants officer is unavailable (or if the agency is closed) due to COVID-19, can grant personnel continue to work and charge salary to the project?

Proposal Submissions

1. If I have a proposal due and my institution closes, will the awarding agency still accept my application?

For details on each federal agency's COVID-19 response see:
https://www.cogr.edu/institutional-and-agency-responses-covid-19-and-additional-resources

2. Will it be possible to submit a proposal if NMT is working at home?

Yes, NMT employees will be working from home and will be available through email and phone. If you have a proposal that needs to be submitted through an electronic portal (such as grant.gov; research.gov, nspires.gov) email judith.mcshannon@nmt.edu (575-386-9660)

3. How will I submit a proposal routing sheet for NMT approvals?

The process for proposal routing if employees are working at home is:
1. PI completes NMT routing sheet
   You do not need to sign your routing sheet, we will ask you and all approvers to sign electronically through an electronic portal, DocuSign. (please allow additional time)

2. Email your routing sheet to your Sponsored Projects Administration (SPA) contact
   In the body of the email write:
   > Attached is a routing sheet for the following proposal
   > PI Name:
   > Agency:
   > Proposal Title:
   > Due Date:

   Attached are the following documents:
   1. Routing sheet (with compliance forms)
   2. Project description
   3. Budget
   4. Budget justification
   5. Any additional documents as needed (such as cost share requirements and F&A limitations)

   The following attached documents need to be signed:
   1. Letters (if necessary)
   2. Forms (if necessary)

3. Once SPA has approved your routing sheet it will be forward to the Research Office which will uploaded to the DocuSign portal for approvals. You will receive an email from DocuSign to electronically sign your routing sheet. And, once your routing sheet is signed, you will receive an email from DocuSign to download your signed copy.

Research Progress Issues

1. **Some research projects have a rigid timeline and have a scope of work timeline violation if deviated from that. Therefore, there are concerns about a slow down or gap in activities if staff may need to work from home.**

COVID-19 is an extraordinary circumstance. If the scope of work demands a precise schedule in order to make an experiment viable, then the investigator should recognize and document instances where that schedule was unable to be met and the data resulting from that experiment may not be able to be used (or can only be used with certain cautions). If it is not the case that such precision is required for scientific reliability but rather needed for good business practices or to meet an agreed-upon sponsored project schedule, it is anticipated that agencies will 0recognize the unique circumstance and be flexible if they can, including granting no-cost time extensions if needed beyond what the institution has authority to grant. Most federal research grants can receive one no-cost extension for up to 12 months in duration.

2. **Will agencies consider longer no-cost time extensions if needed to finish a project after disruption?**

Researchers should document the actual impact of COVID-19 on the progress of their grants to provide substantiation for any future no-cost time extension request. It is not known at this time if agencies will consider longer-than-normal no-cost extensions, or multiple no-cost extensions, in this situation. Most federal research grants can receive one no-cost extension for up to 12 months in duration.

3. **I can't get to my research site and my research will be severely impacted. Will the sponsor provide incremental funding and/or additional time so that I can successfully complete the aims of the award?**

We expect federal agencies will recognize the difficulties inherent in this situation and work with institutions to facilitate the conduct of the project. As a reminder, recipients are required to (1) inform their program officer and grants officer if the need arises for additional federal funds to complete the project (200.308.(c)(1)(viii)) and (2) that notification is required as soon as "problems, delays, or adverse conditions which will materially impact the ability to meet the objective of the Federal award" is known (200.328.(d)(1)). In the latter case, the notification must include a statement of the action taken or contemplated and any assistance needed to resolve the situation. It is possible that there will not be an answer yet on what is needed to resolve the situation; in that case, recipients should simply indicate that they will report back when more is known. If you have this situation, contact SPA to find out how to report it to an agency (email or via the agency's on-line system).

4. **If the IRB or IACUC is not able to process my protocol or protocol continuation may I proceed anyway?**

No, please contact Troylyn Zimmerly at troylyn.zimmerly@nmt.edu

5. **I have lab animals that need to be cared for and I am concerned that staff may not be available to care for the animals or have the access they need to facilities if my institution closes**.

NMT is required to have animal care emergency plans in place as a condition to a federal award involving animal research. Contact Troylyn Zimmerly at troylyn.zimmerly@nmt.edu

6. **If a student or a researcher needs to access a data set from home in order to keep working on a project, how do we address privacy requirements if the data set contains sensitive or private information?**

If the researcher cannot obtain secure access to the data set remotely, researchers should work with ITC to explore whether a secure remote access option is viable for their project. If unsuccessful, researchers should document the amount of time they were unable to work on the data set for the purpose of any subsequent request for a no cost time extension.

NMT Financial Responsibility to Federal Awards

1. **If employees must work from home will they still be able to get paid by grants? If they usually are supervised, or punch in and out, etc., could we be called to task for suspending such oversight while allowing the work to continue?**

If NMT directs employees to work remotely and if employees are able to perform their duties in that environment, then their salary can continue to be charged to the award. For staff who normally punch in/punch out or are subject to direct supervision, alternative methods of work verification may need to be requested by a supervisor.

If an employee cannot perform their duties in that environment (e.g., the nature of their duties requires them to work on-site or they do not have home Internet or access to a computer) and alternate duties that benefit the project cannot be identified, then the direct charge to the award may not be appropriate. Consult with SPA for assistance if that occurs.

2. **What happens if government employees get furloughed or are unavailable to perform their duties (e.g., issue prior approvals or process awards)?**

Federal agencies have put out guidance in the event these circumstances become likely. See: https://www.cogr.edu/institutional-and-agency-responses-covid-19-and-additional-resources

3. **Are travel cancellation costs due to COVID-19 allowable as direct charges to sponsored projects?**

Specific federal guidance on this topic is not yet available. Many airlines are waiving change fees or are offering full refunds for trips that you wish to change. Because the Uniform Guidance

explicitly directs us to follow our policies and because we are expected to have consistent treatment across all fund sources, we expect that sponsors will allow cancellation costs as direct charges to grants and contracts in this set of circumstances. <u>In order to be allowable,</u> <u>the traveler must have requested and been denied a refund</u>. The documentation of such a request should be stored with the award file. Tracking those transactions will allow for corrections in the event that funding agencies issue contradictory guidance.

4. How should credits from cancelled travel costs be handled on sponsored projects?

If a traveler has charged (e.g., through a travel advance) an airline ticket or other travel cost to a sponsored project, and then that trip is later cancelled, the credit must accrue to the sponsored project.

5. If an individual is unable to return home immediately because of travel restrictions due to COVID-19, can their salary continue to be charged to a grant while they are awaiting the lifting of travel restrictions or the availability of transportation? Does it matter if they are able to work on the grant (e.g., telecommuting activities) or not?

The federal agencies have not yet issued guidance on this topic. However, because 2 CFR 200.430 requires consistency across all funding sources but allows variation depending on employment terms for different classes of employees and different appointment terms, we believe it likely that any salary allowed regardless of whether an employee is paid on a sponsored or non-sponsored fund source. Watch for updated guidance as it becomes available.

6. If a researcher chooses to travel related to their work (e.g., to fulfill a grant responsibility such as present a paper or attend a meeting to discuss research) despite the NMT's suspension of non-essential travel, can salary still be charged to the award – even if they need to stay travel longer than originally anticipated?

No, NMT faculty and staff are expected to follow university policy as of the time the trip was undertaken, including any expected return. Faculty and staff members who believe that they have an essential business reason to travel can request an exception from the president, but the expectation is that such waivers will be rare.

7. Can salary continue to be charged if a researcher is on a multi-day self-isolation or self-quarantine period? Does it matter if the researcher is able to continue to work on the project from the self-isolation or self-quarantine site (e.g., home or designated facility) or is not able to work (e.g., because the work must be done in a wet lab or field site?). Does it matter whether the isolation is self-imposed, institution-imposed, or government-imposed?

In general, we expect that salary treatment for sponsored employees will be the same as for non-sponsored employees (including whether or not vacation/sick time needs to be taken or if NMT is providing some other form of paid leave in these circumstances.)

8. If schools or eldercare facilities close, can award-funded employees stay at home to do child-care and eldercare and still charge their salary to a grant?

If an award funded employee stays home due to a school or facility closure for child or eldercare needs, the employee's salary would be charged in accordance with NMT's policy. Employees working from home with the approval of their supervisor or on a mandatory remote plan and are able to fulfill their duties may continue to charge their salary to grants.

9. If the agency program officer or grants officer is unavailable (or if the agency is closed) due to COVID-19, can grant personnel continue to work and charge salary to the project?

In most cases, grantees should be able to continue work until their period of performance and funding is exhausted. If prior approvals are required, the PI (with SPA countersignature) should continue to submit their request to the funding agency using the normal mechanism for that agency (email or on-line system). In the event approval is not forthcoming within the time period for action allowed by the agency (typically 30 days), NMT will need to make an institutional decision about whether to proceed with the action for which approval was requested, understanding that any costs associated with that change may need to be absorbed by the PI if approval is not subsequently granted.