

AWARD MANAGEMENT FAQs

OMB

Notice M-20-17 entitled “Administrative Relief for Recipients and Applicants of Federal Financial Assistance Directly Impacted by the Novel Coronavirus (COVID-19) due to Loss of Operations.” The memo noted “Awarding agencies may allow recipients to continue to charge salaries and benefits to currently active Federal awards consistent with the recipients’ policy of paying salaries (under unexpected or extraordinary circumstances) from all funding sources, Federal and non-Federal. Awarding agencies may allow other costs to be charged to Federal awards necessary to resume activities supported by the award, consistent with applicable Federal cost principles and the benefit to the project.”

Sponsor Guidance

Individual sponsor guidance is being maintained at COVID-19 Research Operations webpage <https://www.bmc.org/covid-19/covid-19-research-related-information>.

Salary Charges

Q: What do we do if Research Staff are unable to work in the Lab and are paid from Grants?

Decisions on salary allocation on grants for individuals unable to work is ultimately up to the awarding agency. Research Operations is monitoring awarding agency guidance and will be contacting departments where after-the-fact changes may be necessary and will continue to update this FAQ.

NIH has followed OMB guidance and any salaries can be charged to grants as long as it is consistent with the rest of the institution (BMC).

Per BMC guidance, asking everyone to minimize laboratory activity to the greatest extent possible and limiting to essential work listed below.

- Long-term experiments and activities that would generate significant financial and data loss if not completed; this includes work to maintain critical samples and animal populations
- Activity that if discontinued would pose a safety hazard
- Activity to maintain critical equipment in facilities and labs
- COVID-19 related activity that has a timeline for deployment that could address the current crisis
- Human Subjects Research: no human subjects should be tested unless there are very special circumstances. Please refer to the FAQs posted here: <http://www.bumc.bu.edu/irb/faqs-impact-of-covid-19-on-human-subjects-research>

Any work that can be done remotely should. If an employee is paid from a grant during this period of COVID-19, the grant should continue to be charged. Please see below sponsor guidance links for guidance from our Awarding Agencies and the Office of Management and Budget (OMB).

Please reach out to your **Post-Award Office Research Operations Contact** if you have concerns with any specific individual or award, and for contact that may be needed with the sponsor.

Travel Charges, Including Cancellations

Q: Are travel cancellation costs due to COVID-19 allowable as direct charges to grants?

The National Institutes of Health (NIH) ([NOT-OD-20-86](#)) has stated nonrefundable costs associated with grant-related travel that has been canceled due to COVID-19 may be charged to the NIH award if they would have otherwise been allowable. For all other agencies, please refer to the specific sponsor guidance found on COVID-19 Research Operations webpage <https://www.bmc.org/covid-19/covid-19-research-related-information>.

Q: How should credits from canceled travel costs be handled on grants?

Grant related travel costs should follow BMC travel and expense policy. Whereas if travel was booked through a World Travel account, the traveler should cancel their flight to allow for BMC to receive a credit. The traveler should email Kathy Loup in Accounts Payable (Kathryn.Loup@bmc.org) and include their name and flight information. AP will move the cost off the grants those flights were charged to and move cost to a discretionary fund. If traveler booked travel through other agencies/sites, traveler should email Kathy Loup (Kathryn.Loup@bmc.org) and AP will move the cost to a discretionary fund. Please include name and flight confirmation as backup. The flight credit will remain in the employee's World Travel account and can be used at a future date, and then charged to a grant if appropriate. Please reach out to your **Post-Award Office Research Operations Contact** to assist with any questions.

Allowability of COVID-19 Related Items on Grants

Q: What do we do with COVID-19 related expenses that are paid from Grants?

If you have any question whether a COVID-19 related expense should be charged to a Federal grant award, please reach out to your **Post-Award Office Research Operations Contact** to assist. Research Operations will work through any expense issues on a case by case basis.

Research Operations is also working with supply chain, AP, and OGC to make sure if cancellation was due to COVID-19 that the institution is not charged at all.

For Industry and Foundation award expenses, please reach out to your **Post-Award Office Research Operations Contact** and they will review items on a case by case basis. If you have

concerns with any specific individual or award, please be sure to have your **Post-Award Office Research Operations Contact** make any contact that is needed with the sponsor.

Project Progress Obligations (addressing delays due to COVID 19)

Q: Will NIH accept late progress reports and financial reports where delays are due to the effects of COVID-19?

If you are unable to complete and submit a financial and RPPR by the scheduled due date, due to the effects of COVID-19, please contact your **Pre-Award Manager Research Operations Contact** for late progress reports and **Post-Award Office Research Operations Contact** for late financial reports, who will contact the assigned grants management and/or program official to let them know the reports will be late.

Note in NIH Guide Notice [NOT-OD-20-083](#), the following guidance has been issued on progress reports: Per NIH Grants Policy Statement sections 8.4.1 and 8.6, as well as the terms and conditions outlined in Notice of Award, NIH requires that recipients periodically submit financial and progress reports. NIH understands that some reporting delays due to the impact of coronavirus may be unavoidable. Therefore, if recipients are unable to complete and submit a progress report ((Research Performance Progress Reports (RPPR)), Financial reports (Federal Financial Report expenditure data), and/or invention report by the scheduled due date, they should promptly contact the assigned grants management and/or program official. Although NIH will accept these late reports, grant awards will be delayed until the required reports are submitted and accepted by NIH.

For all non-NIH agencies, please refer to the specific sponsor guidance found on COVID-19 Research Operations webpage <https://www.bmc.org/covid-19/covid-19-research-related-information>. Please reach out to your **Post-Award Office Research Operations Contact** with any questions.

Q: Will agencies consider longer no-cost time extensions if they are 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 time extensions or multiple no-cost time extensions in this situation, but no-cost time extensions covered under expanded authorities will still be available for federal awards.

Please reach out to your **Post-Award Office Research Operations Contact** if you have concerns with any specific award, and for contact that may be needed with the sponsor to request an extension.

NIH: The [NIH Standard Terms of Award](#) provide the recipient the authority to extend the final budget period of a previously approved project period one time for a period of up to 12 months

beyond the original completion date down in the NoA. Any additional project period extension beyond the initial extension of up to 12 months requires NIH [prior approval](#).

Q: Where a research project has a strict timeline, we are concerned about a possible failure to perform within the agreed-upon statement of work. This failure may be due to a slow down or gap in activities, particularly where staff may need to work from home.

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, then it is anticipated that agencies will recognize the unique circumstance and be flexible if they can, including granting no-cost time extensions if needed. The investigator should reach out to the program officer as soon as a delay is anticipated. Note that this applies to grants.