Welcome! Today's webinar will start shortly.



Important Note from COGR: The content provided during this webinar represents information that is current as of April 17, 2020 and is subject to change as federal agencies issue additional guidance and institutions continue to respond to the public health emergency created by COVID-19.

For more information on federal agency guidance and institutional policies regarding COVID-19's impact to federal awards, please visit COGR's website.

All materials, including recordings, are for educational purposes only and for the benefit of COGR membership. Any other use requires COGR's express permission. The information presented in this Webinar does not constitute legal advice; any recommendations from this Webinar should be considered only after careful review by institution legal counsel and/or other appropriate institution officials.



Announcements



Q&A: Attendees were invited to send questions prior to the start of the webinar to COVID19@cogr.edu. If you have questions during the webinar, use the Q&A function (do not use the Chat function to ask questions). Panelists will answer as many questions as time allows.



• <u>Chat:</u> Feel free to use "Chat" to say hello to other participants or notify the moderators of any technical issues.



• If your question did not get answered during today's webinar, please send your questions to dkennedy@cogr.edu.



- Today's slides will be posted to www.cogr.edu.
- For more information on federal agency guidance, institutional policy links and COGR resources on COVID-19, please visit www.cogr.edu.



Welcome to the COGR COVID-19 Webinar Series!

COVID-19 is having a tremendous impact on the way in which research institutions are conducting their daily activities.



Webinar 1, Planning & Initial Steps, was held on April 9th. Today's Webinar, a Focus on Compensation, is the second in the series. We will schedule additional Webinars based on the status and concerns of the most pressing issues.



Today's Case Studies: A Focus on Compensation Amidst the COVID-19 Crisis

April 17, 2020

Panelists:

Sarah Axelrod, Assistant Vice President, Office for Sponsored Research, Harvard University

James Luther, Associate Vice President of Finance & Compliance Officer, Duke University

Kim Moreland, Associate Vice Chancellor for Research Administration, University of Wisconsin - Madison



Where we are Today ...

Rapidly Changing Landscape

Four OMB guidance documents

M-20-11 (3/9), Administrative relief
M-20-17 (3/19), Administrative relief (con't)
M-20-20 (4/9), Repurposing of PPE, Labor
M-20-21 (4/10), Transparency/Accountability

- Agency guidance following
- CARES Act (Phase III) now in process; a Phase III.5, IV?
- Research institutions, amongst many, doing heroic work
- COGR Resources trying to keep up!



Important Overarching Guidance: OMB M-20-17

- March 19, 2020
- Guidance from OMB to the federal agencies
- Applies to Federal Financial <u>Assistance</u> Directly Impacted by COVID-19
- Contracts are addressed separately by agency
- Federal agencies are issuing guidance

OFFICE OF THE PRESIDENT OFFICE OF MANAGEMENT AND BUDGET WASHINGTON, D.C. 20503

OR

March 19, 2020

7

RANDUM TO THE HEADS OF EXECUTIVE DEPARTMENTS AND AGENC

Margaret Weichert Deputy Director of Management

CT: Administrative Relief for Recipients and Applicants of Federal Financial Assistance Directly Impacted by the Novel Coronavirus (COVID-19) due t of Operations





Search

Institutional and
Agency
Responses to
COVID-19 &
Additional
Resources

Council On Governmental Relations

An Association of Research Universities and Affiliated Medical Centers and Independent Research Institutes

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Institutional and Agency Responses to COVID-19 and Additional Resources

Jump To:

COGR's Webinar Series on COVID-19

Agency Guidance Specific to Federal Award Impact

Institutional Guidance

Additional Resources

COGR's FAQs and Resources on COVID-19's Impact to Federal Awards

Agency Guidance Specific to Federal Award Impact

Jump To:

OMB NIH NSF DOD DOE DHHS FDA HRSA SAMHSA USAMRAA NAVY DOJ CDC NASA

DARPA USDA USAID ONR USDOT EPA NEH NEA IMLS DOC DOI DOL STATE CONTRACTS

NON-FEDERAL SPONSORS FEMA

Office of Management and Budget

M-20-20: Repurposing Existing Federal Financial Assistance Programs and Awards to Support the Emergency Response to the Novel

COGR Terms & Conditions Matrix



Federal Agency Guidance on COVID -19's Impact on I

Agency Name	Late Proposal Acceptance Guidance	Allowability of salaries and other project activities	Late SAM Registration	Other Program Costs
OMB M-20-17		OMB permits awarding agencies to charge salaries and benefits to active award, provided that the recipient has a policy in place for paying salaries under extraordinary conditions.	YES Agencies may permit late SAM registration. Current registrants in SAM with active registrations expiring before May 16, 2020 will be afforded a one time extension of 60 days.	YES Agencies may all OMB permits awarding resume activities.
onal Institutes of Health (NIH)	YES Late proposals may be accepted. NIH will consider whether to accept late applications on a case-by-case basis. NIH (NOT-OD-20-082). Note that a later notice (NOT-OD-20-091) states that all grant applications submitted late for due dates between March 9, 2020 and May 1 2020 will be accepted through May 1, 2020, but that late applications received after May 1, 2020 may not be reviewed until the Jan. 2021 council round.	is performed; or personnel are redenloyed to	YES Late SAM registration permitted. Flexibility with SAM Registration	YES Flexibility is pern NIH has extended vario of award funds, includ refundable costs assoc conferences, costs rela until their later use on associated with the co study visits locally, tra personnel and supply of

- Summary of agency guidance and updates
- Updated regularly
- Check <u>www.cogr.edu</u> for the latest information



Today's Case Studies Will Cover ...

Compensation Amidst the COVID-19 Crisis

- Institutional compensation and leave policies, effective dates, classes of employees, and looking ahead.
- Documentation, Tracking, Accounting, and Recordkeeping.
- Other Considerations: OMB flexibilities after 90 days (June 17), Summer operations, Nonfederal sponsors, etc.



Poll – Did you create an "Idle-time" Compensation policy for individuals not working?

Yes, and we are set for now.

Yes, but we plan to modify the policy.

No, we already had a policy and did not need a new one for COVID-19.

No, we determined we did not need one.

No, we are behind, but plan to have a policy soon.

None of the above.



Harvard University

New Institutional Policies

- 30 days guaranteed
- Enhanced Harvard Workplace Policies coverage till May 28th
- New time recording code emergency excused absence
- FAQ posted to address Harvard paid research assistants, postdocs, fellows, PhD students and research associates
- Faculty

2020 MARCH CALENDAR									
SUN	MON	TUE	WED	THU	FRI	SAT			
1	2	3	4	5	6	7			
8	9	10	11	12	13	14			
15	16	17	18	19	20	21			
22	23	24	25	26	27	28			
29	30	31							





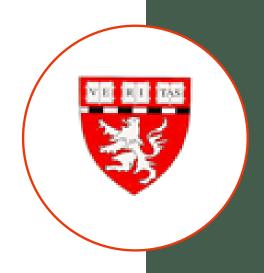
Harvard University

Documentation

- Policy is posted on the University COVID 19 website
- OSP added 4 pages to our website
- OSP maintaining university wide documentation
- Local units maintain PI & grant specific documentation

Tracking

- Salary coding not moved from existing grants
- Grant level activity required report active, inactive, modified report
- Effort tracked and documented at local level





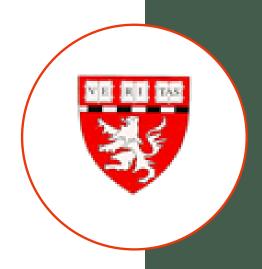
Harvard University

Effort Reporting

- Q3 project certifications (Jan-March 2020)
- New attestation language

Other Compensation Issues

- Fed and non-fed awards treated the same
- Idle staff salaries cannot be moved to any award
- New postdocs & fellowships accepted if work can be performed
- Faculty summer/supplemental salary only allowed if work can be performed





- Institutional Policy/Guidance
 - Campus "Wind-down" → 3/17/20:
 - "...direct person-to-person contact <u>must also cease</u> at this time."
 - 3/17/20: "Interim Policy Continuation of Salary & Benefits Policy"
 - ...<u>all Duke Faculty, staff, and students will continue to stay in a paid work status</u> regardless of the work location or work schedule...
 - ...<u>allocated to the funding structure in place at the time the individual began working remotely...</u>
 - Accompanying FAQ Status of Ability to Work
 - Able to work remotely? Able to do other work activities? Not able to work remotely?



Considerations

- Changing Environment
- Criticality of Documentation
- Industry & Foundations Projects

- New awards
- Federal Contracts
- Non-exempt employees



- Background
 - Applicable Regulations: Flexibility → Internal Controls → Documentation ¥ Idle Time?
- Process
 - Paper Form Maintained in Department
 - Under-development → SAP Payroll



Payroll

Allocation

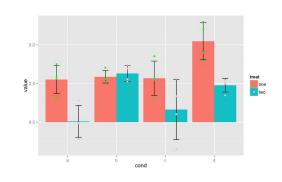


- Considerations
 - How might this data be used in the future?
 - Incentives? Disincentives? → Accuracy
 - PI Role
 - Exempt/Non-exempt → (Effort Management) → New
 Attestation



Post June 19th and Beyond?

Summer Effort



- Implications How will the collected data be used?
 - Lab Restart Preparation
 - Postdocs/Students
 - Grant-by-Grant Reporting Aims, Budget, Timeline → Supplements
 - Financial Transparency for Leadership
 - Audit and/or Substantiation → Policy/Guidance Exception, CARES, FEMA, DOE, etc.





Resources

- General
 - https://coronavirus.duke.edu/
 - https://research.duke.edu/coronavirus-research-FAQ

Compensation

- Interim Policy Continuation of Salary & Benefits Policy During COVID-19 Pandemic
 - https://research.duke.edu/covid-19-allowable-costs-charges-effort-sponsored-projects
- FAQ
 - https://research.duke.edu/covid-19-allowable-costs-chargeseffort-sponsored-projects





University of Wisconsin - Madison



- Life without March Madness:
 A brief history
- Working remotely and not working
- Making sense of effort reporting Really?
- Options for summer salary
- Will there be football or furloughs?





University of Wisconsin - Madison



RESOURCES:

Research and Sponsored Programs

https://rsp.wisc.edu/

COVID-19 Updates Related to Sponsored Programs

https://rsp.wisc.edu/COVID.cfm





Overall Take-Aways

Safety First, Safety First, Safety First

Compensation Policies: Will Evolve

Documentation Access: Long-term View

Ramp-up: Gradual and Variable Models



Q & A



for more information on Institutional and Agency Responses to COVID-19 and Additional COGR Resources and contact us at COVID19@cogr.edu

Thank You

