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.

• **Chat:** 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 d kennedy@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 Assistance Directly Impacted by COVID-19
- Contracts are addressed separately by agency
- Federal agencies are issuing guidance
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: Renumbering Existing Federal Financial Assistance Programs and Awards to Support the Emergency Response to the Novel
### Federal Agency Guidance on COVID-19's Impact on...

<table>
<thead>
<tr>
<th>Agency Name</th>
<th>Late Proposal Acceptance Guidance</th>
<th>Allowability of salaries and other project activities</th>
<th>Late SAM Registration</th>
<th>Other Program Cost</th>
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</thead>
<tbody>
<tr>
<td>MB M-20-17</td>
<td>YES — Agencies may accept late applications. OMB allows awarding agencies to provide flexibility for submission of competing applications (optional and unsolicited). See OMB Memorandum M-20-21. Administrative Relief for Recipients and Applicants of Federal Financial Assistance Directly Impact</td>
<td>YES — Agencies may permit charging of salaries of idle staff. OMB permits awarding agencies to charge salaries and benefits to active award, provided the recipient has a policy in place for paying salaries under extraordinary conditions applicable to all funding sources.</td>
<td>YES — Agencies may permit late SAM registration. Current registrants in SAM with active registrations expiring before May 26, 2020 will be afforded a one-time extension of 60 days.</td>
<td>YES — Agencies may of OMB permits awarding agencies to reconsider activities.</td>
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<tr>
<td>National Institutes of Health (NIH)</td>
<td>YES — Late proposals may be accepted. NIH will consider whether to accept late applications on a case-by-case basis. See NOT-OD-20-058. Note that a later notice (NOT-OD-20-062) states that grant applications submitted late due to dates between March 9, 2020 and May 2, 2020 will be accepted through May 2, 2020, but that late applications received after May 1, 2020 may not be reviewed until the Jan. 2021 council round.</td>
<td>YES — Salaries of idle/redeployed staff can be charged to grants. NIH will permit charging to awards of salaries and benefits paid to employees when due to COVID-19 work is performed remotely; no work is performed; or personnel are redeployed to provide clinical care for COVID-19 patients, provided the award recipient’s institutional policy permits such charges to all funding sources. See NOT-OD-20-066.</td>
<td>YES — Late SAM registration permitted.</td>
<td>YES — Flexibility is permitted. NIH has extended various award deadlines, including conference, costs, and associated travel.</td>
</tr>
</tbody>
</table>

- Summary of agency guidance and updates
- Updated regularly
- Check [www.cogr.edu](http://www.cogr.edu) for the latest information
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, Non-federal 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
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
Duke University

• Institutional Policy/Guidance
  • Campus “Wind-down” → 3/17/20:
    • “…direct person-to-person contact must also cease at this time.”
  • 3/17/20: “Interim Policy – Continuation of Salary & Benefits Policy”
    • ...all Duke Faculty, staff, and students will continue to stay in a paid work status regardless of the work location or work schedule...
    • ...allocated to the funding structure in place at the time the individual began working remotely...
  • 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
Duke University

• Background
  • Applicable Regulations: Flexibility → Internal Controls → Documentation ≈ Idle Time?

• Process
  • Paper Form Maintained in Department
  • Under-development → SAP Payroll

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

• 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.
Duke University

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-charges-effort-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
Thank You

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