

March 26, 2020

Dear Lead Principal Investigators and Lead Project Directors:

As we communicated to the campus community and through the ORDA Update, the Office of Research Development and Administration remains operational, and I expect that we will remain so during the remainder of EMU's response to COVID-19.

Even during these difficult times, we are seeing that important work continues. ORDA is providing this guidance, recognizing that the work is being done in a manner that ensures the wellbeing of the individual members of the research/project teams, the entire team, and their families. We also recognize the University's responsibility to provide proper stewardship and oversight for Sponsor funds. As you can know, this is a balancing act during this time. We are monitoring agency guidance, and that of the research and sponsored projects community. As the need for the University's response becomes more prolonged, ORDA is providing Principal Directors/Project Directors (PIs/PDs) with the following guidance.

SPONSORED PROJECTS AND SALARY CHARGES

Salaries on federal and non-federal sponsored projects during EMU's COVID-19 response MAY be charged to the award under any of the following conditions:

- a. Remote work was originally planned as part of the Scope of Work and is being executed in accordance with this approved plan, (or if a change in the SOW has been approved by sponsor);
- b. Alternate work that directly benefits the project can be assigned (please see more information in the Project Performance section below);
- c. An exception to the University's COVID-19 response has been granted by academic leadership, and work can continue on-campus, or within the community as normal [See below for how to request exceptions.];
- d. The sponsor is allowing for these charges even when work directly benefiting the project cannot be performed.

Two agencies have issued guidance allowing the continuation of salaries in a manner consistent with University's policy to continue salaries with its own funds even in instances where it is unable to perform work: The National Institutes of Health has issued agency-wide guidance ([NOT-OD-20-086](#)), as has the National Science Foundation (NSF Implementation of [OMB Memorandum M-20-19-17](#)). Please contact ORDA if you have questions about other agencies funding your work.

Each project proposal provides the basis for the approved Scope of Work (SOW)/Specific Aims, and is also, the basis for EMU's obligation for project performance. PIs/PDs have the authority to reassign work within the approved SOW, unless this authority is specifically restricted under the award terms and conditions. PIs/PDs should assess their projects and determine if progress on the approved SOW can be carried out remotely. If not, please consider assigning alternate tasks that contribute to, and are directly related to the sponsored project.

Principal Investigators/Project Directors may NOT continue charging salaries to sponsored projects during EMU's COVID-19 response when none of the above apply. Instead, PIs/PDs should:

- a. Immediately reassign staff work on other externally funded projects where remote work is feasible, and funding exists;
- b. Work within your administrative chain to determine if staff can be assigned to non-sponsored activities funded by EMU funds.

Please remember that salaries must be charged to the source that benefits from the performed work. If grant-funded personnel are assigned to another grant, their work must benefit that other grant. If their work benefits two or more grants, portions of their salary can be assigned to two or more funding sources in proportion to the benefit each project receives.

PROJECT PROGRESS AND PERFORMANCE

Please remember that changes to staff assignments and funding sources may impact a PI/PD's ability to complete the project as proposed. The following guidance is provided for cases where any of the following prevent your ability to fulfill the approved Scope of Work, within the approved timeframe, and with the resources available in the approved budget:

- a. Making remote work re-assignments for tasks, that while legitimate award activities, may not result in enough progress to complete the award in the approved project period;
- b. Moving staff off the award to projects that can be completed through remote work when the ability to work remotely on a project is limited, or not available.
- c. Continuing to pay project staff where Sponsors specifically are allowing staff to continue even if remote work is not possible.

Reassigning duties and focusing on alternate tasks may create a budget shortfall when normal project activities are resumed. We expect that agencies will unilaterally support no-cost time extensions except in the rarest of occasions. Agencies are exploring the possibility of entertaining supplemental funding requests, or changes in project scope. There is no clear consensus about this yet, so while preliminary we encourage conversations with a PI's program officer to explore these possibilities, please remember that all requests for changes in SOW, budget revisions, and no cost time extensions must be submitted through ORDA. Also, it is important to note that program officers may not yet know the extent of their ability to provide additional funding.

Supplemental Funding Request: PIs/PDs should informally explore options agencies are considering. Any request for supplemental funds, however, must follow the same administrative procedure as other proposals for [externally sponsored projects](#).

No-Cost Time Extensions: On federal awards, the Office of Research Development and Administration has the authority in most cases to authorize a one-time no-cost time extension not exceeding a one-year period. Contact your ORDA pre-award officer to explore this option if an extension will be needed to complete the work as proposed.

Change in Scope of Work: Please contact your pre-award office at ORDA to discuss this option. We'll work with you to determine if changes constitute a change in the SOW, and if so, what steps are required by EMU and the Sponsor.

Budget Revision Requests: Budget revision requests will be handled in accordance with ORDA's administrative procedure, [Re-budgeting Sponsored Program Funds](#). Please contact Brian Moynihan, post award manager, with any questions or request for assistance.

RECORD KEEPING AND DOCUMENTATION

It is imperative for PIs/PDs to document all activities during this period. If working remotely, tracking how this work advances progress towards the goals of the project is important to protect against expenses being declared unallowable. If alternate tasks have been assigned, please document how these tasks contribute to, and directly support the approved SOW. Please forward all communication to ORDA from your Sponsor, particularly those that indicate charging salaries to awards is allowable even if no work is being performed.

EXCEPTIONS

Exceptions: PIs/PDs may submit requests for an exception from interrupting their research and sponsored activities by emailing emuprovost@emich.edu. Faculty should describe:

- Why the research/project must continue.
- What work needs to be done?
- Who will do the work?
- What is the last step of the procedure?
- How long will it take to complete the entire procedure?

PIs/PDs must attest: they will abide by CDC hygiene protocols; there will be no visitors in the lab; no more than two people will be working in a PI's lab space at one time; individuals will remain at least two meters (6 feet) apart at all times; no students will be compelled to come to campus or work in the lab; that lab surfaces, handles, and keyboards will be cleaned and disinfected before beginning use and before leaving; and appropriate PPE will be worn at all times. These persons must access the laboratory building via swipe card, contact DPS on each occasion. They should be prepared to certify on each visit that they have measured a normal body temperature that day and have no virus symptoms. *Exceptions are unlikely to be granted before April 15, 2020; however, we will return to these requests as the situation improves.*

ORDA staff is working remotely and accessing several tools, such as Google Meet and Zoom, to make these remote interactions more engaging. We are continuing to support the development of proposals, submit applications, and assist with the management of grant-funded projects. We are also closely monitoring agency guidance and are receiving communications for our sponsors. Following you will find a list of telephone numbers at the end of this document to reach ORDA staff directly.

Caryn Charter, Director	734.487.9175
Susan Campbell, Senior Pre-award Officer	734.487.3092
Cathy Gable, Sponsored Projects Officer	734.487.2726
Jennifer Glass, Research Development Officer	734.487.9212
Cindy Monzon, Sponsored Projects Officer	734.487.3756
Brian Moynihan, Post Award Manager	734.487.2798

We thank you all for continuing the important work you are doing and appreciate the difficulty of the current situation.

Sincerely,



Caryn Charter
Director

cc: Department Head/School Director/Director
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