

Federal Guidance to Grantees and Applicants RE: COVID-19

Updated: August 27, 2020

Agency-Specific Guidance:

NSF: https://www.nsf.gov/news/special_reports/coronavirus/

NIH: <https://grants.nih.gov/policy/natural-disasters/corona-virus.htm>

USDA/NIFA: <https://nifa.usda.gov/coronavirus>

NEA: <https://www.arts.gov/COVID-19-FAQs>

Other federal agencies:

<https://www.cogr.edu/institutional-and-agency-responses-covid-19-and-additional-resources>

Revised Federal Guidance (June 18, 2020):

OMB: <https://www.whitehouse.gov/wp-content/uploads/2020/06/M-20-26.pdf>

*Updated: REVISED Federal Guidance (June 18, 2020)

“Due to the limited funding resources under each federal award to achieve its specific public program goals, awarding agencies must inform recipients to exhaust other available funding sources to sustain its workforce and implement necessary steps to save overall operational costs (such as rent renegotiations) during this pandemic period in order to preserve Federal funds for the ramp-up effort. Recipients should retain documentation of their efforts to exhaust other funding sources and reduce overall operational costs.”

Columbia Guidance (Revised):

https://research.columbia.edu/COVID-19_Research/allowability-on-sponsored-projects

NOTE: The College issued this guidance originally on April 17, 2020 in compliance with the current federal guidance; this document contains updated guidance in response to changes in federal guidance.

Salary-Specific (Pay Continuity) Guidance:

1) May I continue to charge salaries and benefits to grants for personnel who continue to work remotely?

Yes. If an individual is working remotely and contributing to a sponsored project, then salary can be charged to that grant. The usual grants management requirements apply. If an individual cannot contribute to their current project but can contribute to another sponsored project, the salary must be moved to that funding source.

2) *May I continue to charge salaries and benefits to grants for personnel who cannot work remotely or in person due to COVID-19-related disruptions?*

No. For individuals who cannot perform their activities remotely, but are still not able to work on campus, salary transfers are required. Specifically, where an individual's effort on sponsored projects is significantly reduced because their ability to be on campus is materially constrained, an amount of salary commensurate with the individual's reduced activity must be transferred from the sponsored project(s) to a non-sponsored source, such as a PI's indirect cost recovery account.

We are making this update to our guidance based on revised federal guidance, which added a significant restriction to the previous interim policy that had allowed salaries to be charged to grants even where individuals were unable to work because of COVID-19 disruption. Under the revised federal rules, Barnard is required "to exhaust other available funding sources to sustain its workforce and implement necessary steps to save overall operational costs (such as rent re-negotiations) during this pandemic period in order to preserve Federal funds for the ramp-up effort."

Our review suggests that this requires using faculty discretionary funds and departmental and school resources before being able to charge pay continuation costs to sponsored awards. This new requirement to exhaust other resources, and the documentation required, presents significant risk to the research enterprise. For this reason, the College, like many of our peers, will no longer afford itself of this pay continuity flexibility.

The new federal guidance remains in effect until September 30, 2020. At that time, Barnard will review any new guidance and revise our policy accordingly.

Please direct any questions to Mark Godwin in Sponsored Research or Robin Beltzer in Human Resources.

3) *Does Barnard's current hiring freeze extend to grant-funded positions?*

No. Barnard's current hiring freeze does NOT extend to grant-funded positions, as long as salary AND benefits are charged to the grant.