Date: March 18, 2020

To: All UNT Campus Researchers

From: Mark R. McLellan, Vice President for Research & Innovation

RE: March 18th Update on campus research operations under COVID19

General:

- We encourage all researchers to monitor their funding agency website for updates.
- If you run into issues executing your grant, ask the office of Grants & Contract Administration to reach out to the agencies for guidance.

Proposal specific guidance from NIH:

- Among the federal granting agencies often NIH is seen as the guide and bellwether for other agencies due to the huge extramural funding portfolio that NIH manages annually.
  - **Regarding NIH Applications:**
    - *When delays occur because the applicant or recipient organization is officially closed or unable to submit grant applications due to the effects of COVID-19, the NIH will consider accepting applications late, on a case-by-case basis, in accordance with the NIH Grants Policy Statement, https://grants.nih.gov/grants/policy/nihgps/html5/section_2/2.3.9_application_receipt_information_and_deadlines.htm, Section 2.3.9, under the following circumstances:*
      - *Institutions must submit applications or reports as soon as possible after reopening or resuming operations so that grant applications can be submitted, not to exceed the number of days the institution was officially closed or unable to submit grant applications.*
      - *Institutions must submit a cover letter with the applications with enough detail about the delay so that NIH staff can make a determination whether circumstances justify accepting the application late.*
      - *Institutions need not request advance permission to submit late due to this declared emergency.*

- **If UNT officially closes or forces individuals into quarantine, the Grants & Contracts Administration office will prepare and submit the above cover letter to address the closure.**

Grants & Contracts:
- UNT Currently pays about $7.5M in Federal salary dollars from our sponsored project awards. UNT pays far more in salary dollars from State of Texas funding.
- State of Texas regulations currently do not allow for any employee to be paid when they are not working except when using a state authorized employee leave for the purpose authorized by that leave.
- NIH, leading the federal agencies, has stated:
  - From NIH (https://grants.nih.gov/faqs#/covid-19.htm?anchor=question55769):
    "*Charging salaries to NIH grants <u>when no work is being performed is allowable if your organization's policy allows for the charging of salaries and benefits to currently active awards (under unexpected or extraordinary circumstances) from all funding sources, Federal and non-Federal.</u> If you have such a policy, and anticipate a need to charge personnel costs, please notify the funding IC. NIH may request documentation to confirm the requirements of the institutional policy.*"
- Given this statement, it is unlikely at this time that UNT can meet that global obligation to fund salaries from all funding sources if we are forced into closure or full **quarantine** and individuals cannot work.
- Therefore, now is the time for all Principal Investigators funded by grants to act and plan accordingly. In case UNT moves quickly to closure or **quarantine,** please:
  1. <u>Assess the scope of your award and the wording of the proposal</u> and award.
  2. <u>Specifically identify, list and formally record</u> all possible and reasonable activities that meet the expectations and scope of work which may be accomplished in a remote setting such as a researcher's home. (i.e. literature review pertaining to the grant, bibliographic collections pertaining to the grant, data analysis, data preparation, statistical runs using various models, writing of papers on the work, meta data preparation, data management preparation to meet DMP requirements, data repository searches for use with the project, etc.)
  3. <u>Share that list with your paid researchers</u> for discussion so that all researchers understand the work you have identified.
  4. <u>Make work assignments</u> to all researchers which would be triggered in case of closure or quarantine.
  5. **If no assignments are possible and no work is possible on the grant, then charging salaries to the grant is not allowable.**

    i. In this case, please seek collaborations with other PIs, the department, or the college for possible job duties that an individual could be assigned and paid by.

- Contracts & Grants Administration will be monitoring this constantly and update with follow on communications we learn more.