




Salary continuation on federal awards

July 27, 2020



Background on OMB Announcements

- **OMB issued memo ([M-20-17](#)) on March 17, 2020** to federal agencies that provided temporary flexibilities for a 90-day period to federal grants impacted by COVID-19. This allowed salary/benefits to continue to be charged to federal award when staff/researchers were unable to work.
- **On June 18, 2020 OMB issued a memo ([M-20-26](#))** which extends some but not all of the flexibilities outlined in the earlier memo. Federal agencies can continue to allow charging of salary and benefits to federal grants consistent with the recipient institution's policy for salary continuation (Stanford's policy is due to expire 8/31/20) with the additional requirement that we *"exhaust other available funding sources to sustain the workforce and implement necessary steps to save overall operational costs"*

*As a result of the new requirement, the University has determined **we will not take advantage of this flexibility after June 18***

Requirements for phase I

Phase I

March 17, 2020 - June 17, 2020

- Identify faculty and postdocs that were charged to federal awards but were not able to work
- Validate that all **staff** who were unable to work have used the COVID-19 timesheet codes
- Validate that a *COVID-19 Central Office Request Form* was submitted to RMG to document salary continuation was utilized on the grant during this period

Requirements for phase II

Phase II

June 18, 2020 - August 31, 2020

- **Identify faculty, postdocs, and staff** that were charged to federal awards but were not able to work
 - **Reevaluate the scope of work** to identify work allocable to that federal award that those individuals can continue either on-campus or remote so salary can continue to be charged
- or*
- **Transfer salaries and benefits** of those individuals **to another sponsored award** where they can contribute to the scope of work
- or*
- **Transfer salaries and benefits** of those individuals **to an unrestricted funding source** provided by the PI or the Division/Department

Next steps in the process

1. We are working with the University to **develop a report that will provide each Department/Division** a listing of all active federal awards with the following information:
 - Spo#
 - Award and Task numbers
 - Name and Employee ID of those charged for the 2 periods (*Phase I=3/17-6/15 and Phase II=6/16-to date; these dates are slightly adjusted to coincide with payroll periods*)
 - More details and instructions on how to treat the various COVID codes will be provided
2. Review with your PIs to **identify individuals who were unable to work** on the grant during Phase I and Phase II
3. Reevaluate work that could be performed on the award or **identify other funding sources**
4. Make **LDA adjustments** as needed
5. Ensure staff use the **COVID timesheet codes** in future pay periods if they are unable to work
6. Make sure a **COVID-19 Sponsor Notification and Request Form** has been submitted in SeRA for all federal awards personnel were paid while unable to work
7. Maintain **documentation for the life of the award and 3-years beyond** the award end date for audit purposes

