Memo: Documentation of Sponsored Research Activities impacted by the COVID-19 Emergency

TO: Harvard Researchers and Research Administrators

FROM: Ara Tahmassian, Chief Research Compliance Officer, OVPR
Sarah T Axelrod, Assistant Vice President, OSP

Re: Documentation of Research Personnel Effort & COVID-19 Related Costs

DATE: April 30, 2020

The purpose of this memo is to remind researchers and administrators of their responsibility to maintain adequate documentation of research personnel effort & other project costs as well as project scope changes and project timing during this time of remote research activities. While no additional documentation is required for award activity unaffected by the shift to remote work, documentation is required for all awards impacted by the COVID-19 emergency.

Earlier this month schools, departments, or research units returned spreadsheets to OSP indicating the status of each award. Those identified as being modified or inactive require ongoing documentation of the impacts on scientific progress as well as salary charges for idle or reduced effort. Additionally, any award that shifts from fully active to a modified or inactive status, during the COVID-19 emergency, must also document the impacts. As was noted in a March 16th email to all research administrators across the university, “documentation is critical, be sure to identify COVID-19 related incremental costs and salary unrelated to effort, and maintain that documentation.”

To be prepared to identify the costs of projects where effort is reduced or work on projects has been halted, as noted above, you should have tools and resources in place to track research personnel and other costs on grants. If you need help documenting/tracking these costs, please reach out to your respective Research Administration school contact(s)* for assistance.

It is critical to document research progress, personnel efforts & any other project costs related to the interruption of operations or services during this time of modified research activities for several reasons:

• It will be necessary information for those sponsoring agencies that disallow salary charges when work in support of a project is not possible
• Federal sponsors, including NIH (FAQ dated April 13, 2020), have issued instructions regarding notification about any personnel charges for idle work and
other impacts, such as changes to project scope, as a result of the COVID emergency

- Documenting the impact of COVID-19 will also be beneficial if supplemental funding is made available by a sponsor in the future

We continue to post links to Federal Agency Guidance on charging costs to sponsored projects during the COVID-19 pandemic emergency. Please refer to the guidance pertaining to grants or contracts provided by your specific funding agency to determine what is allowed for your project. The Office of Management & Budget (OMB) will be reassessing their guidance to federal agencies within 90 days of March 19th (by June 17th). The current Harvard policy allows charges on federal awards for non-working personnel through May 28th.

Non-Federal Sponsor Guidance is also available on the OSP website and updated daily as we receive additional information from our sponsors. You may also reach out to your School COVID-19 contact* or the Office for Sponsored Programs with questions (Christyne Anderson).

Please contact us with any questions and thank you for all your efforts during this unprecedented time.

*School contacts:
- HMS – Rita Bergemann
- HSPH – Kay Sullivan
- FAS – Pat Fitzgerald
- SEAS – Pam Baker-Webber
- HGSE – Tiffany Blackman
- HKS – Carrie Kachoria
- GSD – Anne Mathew
- Wyss - Paula Cornelio