

Information on a Potential Federal Shutdown – October 1, 2023

Impacts on Federally Funded Research

I am writing to share the University's plans in the event of a federal government shutdown, beginning **October 1, 2023**.

For Harvard's federally funded research, much of our activities can continue with limited impact provided that the shutdown is not prolonged. We will continue to evaluate the situation and will provide additional information as it is available.

At this time, the Office of Management and Budget (OMB) has not provided final guidance to federal funding agencies about what actions they may or may not take during a shutdown. The following is based on existing federal agency contingency plans and current federal guidance, therefore, we anticipate the following:

1. Spending on Active Awards

Existing federally funded **grants and cooperative agreements** may continue spending until such time as they run out of existing obligated funding. For **contracts and other transaction agreements**, spending may continue until obligated funding is exhausted unless a stop work order has been issued by the funding agency (which may occur under a shutdown). Please confer with your OSP or ORA contact if you receive such a stop work order. General announcements from an agency that the federal government is shutting down need **not** be shared.

2. Proposal Submissions

It is expected that federal electronic proposal submission systems will remain functional and available for submissions and that current deadlines will apply; however, Help Desks associated with those systems may be unavailable. This means that if there is a problem with a given submission, the University should be able to record a "Help Ticket" electronically (to show that an on-time submission was attempted) but may not receive a response until after the shutdown. New NOFOs (Notice of Funding Opportunities) are not expected to be released until after the shutdown is over.

3. Awards (Including Just-In-Time Requests)

Federal awards are not expected to be received during the shutdown. This includes new/renewal awards and continuation awards, supplements, and incremental funding. In addition, requests from agencies for pre-award or mid-award documents (e.g., revised budgets, just-in-time requests) are not expected to occur. OSP and the 2 ORA offices are working to complete negotiations and sign as many pending awards as possible prior to October 1.

4. Technical and Financial Reports

If an electronic reporting system for a given agency remains available (expected at most agencies), then all reports must still be submitted by their original deadline. In the event of a failed technical report

submission attempt, investigators should request a Help Ticket to showcase the attempt to file the report on time. These tickets will likely be able to be requested online even if the Help Desk itself is not being staffed. If a report is intended to be emailed, it too should be filed on time, though report “acceptance” by the agency may not occur until after the shutdown.

5. Prior Approvals

Agency systems that include the ability to submit prior approval requests are expected to remain functional, and prior approval requests may be submitted by OSP/ORA; however, responses from federal agencies will likely not be received until after the shutdown is over. OSP/ORA is often able to approve an initial, up-to-12-month-no-cost time extension on routine federal grants without prior approval (followed by notification to the agency in their systems). In these cases, we will continue to approve such requests. Other no cost time extensions (ones requiring agency prior approval) may be requested by OSP/ORA, but a response from a federal agency is unlikely to occur until after the shutdown.

6. Payments

OSP has adjusted our draw-down request on our NIH LOC to include the September payroll. It is not expected that the University will receive payments during the shutdown period, but payments for expenses legitimately incurred during the shutdown are expected to be reimbursed afterwards. In the interim, the University’s financial system will allow expenses to be posted, creating a receivable until reimbursement is received from the federal agency. The Harvard Treasury Office will fund this cash deficit.

Payments on federally funded outgoing subawards will continue until further notice. We do not anticipate holding these payments, however we will re-evaluate if the shutdown is of a significant duration.

7. Agency Visits to Campus/Study Sections/Meetings Involving Federal Officials

Agency visits and meetings with federal officials are not anticipated to take place during the shutdown period, nor will virtual or on-line peer review/study section meetings. Guidance will be provided about travel tickets already purchased for such events once more information from the agencies is known.

8. Exceptions

Some agency programs have multi-year appropriations that enable them to continue work, or deal with critical activities (e.g., for human health or public safety) that cannot safely be deferred. In these cases, certain agency officials may be deemed “essential” and able to continue working. This means that certain activities (such as prior approvals) may still be forthcoming for certain projects. It is also possible that the University will be awarded some funding on subawards if the prime recipient had received its own federal funding prior to the shutdown; this is at the discretion of the prime recipient.

If you have any questions or concerns, please contact OSP, ORA or the OVPR.