MSU Denver Office of Sponsored Research and Programs
Research Continuity Plan, COVID-19

In response to COVID-19, the Office of Sponsored Research and Programs is instituting a university-wide Research Continuity Plan for all active grants as part of their grants management plan. We are requiring that all Principal Investigators on currently active grants work with their grant support staff to complete Research Continuity Plans in an effort to best prepare for, and anticipate, any interruptions in program progress as a result of COVID-19. Please submit plans to Mandy Wilson at awils109@msudenver.edu. Once plans are submitted and reviewed, OSRP will coordinate with PIs and funding agency representatives to determine necessary adjustments or revisions to grants and research programs going forward. Please find university policies regarding campus access, in-person human subject data collection, and international travel in response to COVID-19 below, as well as applicable OMB guidance to federal funding agencies regarding management of grants and research. Refer to https://www.msudenver.edu/coronavirus-update/ for the most up to date information regarding university response to COVID-19.

Notification of Campus Closure - Early Bird Announcement, March 19, 2020
https://www.msudenver.edu/coronavirus-update/
"Until further notice, buildings on the Auraria Campus will not be accessible, except for the Health Center for Auraria, which will have regular clinic hours (weather permitting) to serve our community.

Going forward, ONLY essential personnel and those working on critical research projects – vetted by senior leadership at each institution – will be allowed access to their respective spaces until we are confident that we can resume on-campus operations. We ask that you respect this process."

Notification of Suspension of All In-Person Human Subject Data Collection - MSU Denver Institutional Review Board (IRB) Announcement
https://www.msudenver.edu/irb/
"COVID - 19 UPDATE
In the interest of prioritizing public health, EFFECTIVE IMMEDIATELY, the MSU Denver IRB is suspending ALL in-person human subject data collection, until further notice.

Studies involving face-to-face interaction with participants must be paused or modified. A notification will be sent when normal research activities may resume.

Modifications can be made to transition to remote functioning (i.e. web conferencing, online surveys, etc.). MSU Denver Information Technology Services recommends the use of Qualtrics or Microsoft Forms for survey collection, and Microsoft Teams is the recommended platform for remote web conferencing.

If your protocol does NOT involve the collection of identifiable data, at this time you may move to an online or remote data collection process without submitting a modification/amendment. REMINDER, for all online surveys, participants must be able to skip any and all questions.

<u>If your protocol DOES involve the collection of identifiable data, and would like to continue data collection, please submit a modification via IRBNet asap.</u>

Please contact your HSPP manager with any questions or concerns (hspp@msudenver.edu)"

MSU Denver's online training program (CITI Program) has additional information regarding government resources, program articles, university pages, and other resources in response to Covid-19 at the following link: https://about.citiprogram.org/en/coronavirus-covid-19-resources/

Notification of <u>Suspension of All University-Related International Travel</u>
https://www.msudenver.edu/coronavirus-update/coronavirus-email-international-travel/

Announcement from President Janine Davidson, March 9, 2020
"Out of an abundance of caution, and to protect our community from potential exposure to coronavirus (COVID-19), Metropolitan State University of Denver is **suspending all University-related international travel.** This suspension is being made in accordance with CDC recommendations to avoid or postpone nonessential trips.

International Travel
- As of April 16, 2020, all MSU Denver-related international travel, including study abroad, is suspended through the end of summer 2020 semester.
- All personal international travel is strongly discouraged. Please use your best judgment when making decisions about upcoming trips."

<u>Office of Management and Budget (OMB) Guidance to Federal Funding Agencies</u>
OMB M-20-17, dated March 19, 2020

No-cost extensions on expiring awards. (2 CFR § 200.308)
To the extent permitted by law, awarding agencies may extend awards which were active as of March 31, 2020 and scheduled to expire prior or up to December 31, 2020, automatically at no cost for a period of up to twelve (12) months. This will allow time for recipient assessments, the resumption of many individual projects, and a report on program progress and financial status to agency staff. Project-specific financial and performance reports will be due 90 days following the end date of the extension. Awarding agencies will examine the need to extend other project reporting as the need arises.

Allowability of salaries and other project activities. (2 CFR § 200.403, 2 CFR § 200.404, 2 CFR § 200.405)
Awarding agencies may allow recipients to continue to charge salaries and benefits to currently active Federal awards consistent with the recipients' policy of paying salaries (under unexpected or extraordinary circumstances) from all funding sources, Federal and non-Federal. Awarding agencies may allow other costs to be charged to Federal awards necessary to resume activities supported by the award, consistent with applicable Federal cost principles and the benefit to the project. Awarding agencies may also evaluate the grantee's ability to resume the project activity in the future and the appropriateness of future funding, as done under normal circumstances based on subsequent progress reports and other communications with the grantee. Awarding agencies must require recipients to maintain appropriate records and cost documentation as required by 2 CFR § 200.302 -*Financial management* and 2 CFR § 200.333 -*Retention requirement of records* to substantiate the charging of any salaries and other project activities costs related to interruption of operations or services.

Allowability of Costs not Normally Chargeable to Awards. (2 CFR § 200.403, 2 CFR § 200.404, 2 CFR § 200.405)
A warding agencies may allow recipients who incur costs related to the cancellation of events, travel, or other activities necessary and reasonable for the performance of the award, or the pausing and restarting of grant funded activities due to the public health emergency, to charge these costs to their award without regard to 2 CFR § 200.403, *Factors affecting allowability of costs,* 2 CFR § 200.404, *Reasonable costs,* and 2 CFR § 200.405, *Allocable costs.* Awarding agencies may allow recipients to charge full cost of cancellation when the event, travel, or other activities are conducted under the auspices of the grant. Awarding agencies must advise recipients that they should not assume additional funds will be available should the charging of cancellation or other fees result in a shortage of funds to eventually carry out the event or travel. A warding agencies must require recipients to maintain appropriate records and cost documentation as required by 2 CFR § 200.302 -*Financial management* and 2 CFR § 200.333 *Retention requirement of records,* to substantiate the charging of any cancellation or other fees related to interruption of operations or services. As appropriate, awarding agencies may list additional guidance on specific types of costs on their websites and/or provide a point of contact for an agency program official.

Extension of financial, performance, and other reporting. (2 CPR§ 200.327, 2 CPR§ 200.328)
Awarding agencies may allow grantees to delay submission of financial, performance and other reports up to three (3) months beyond the normal due date. If an agency allows such a delay, grantees will continue to draw down Federal funds without the timely submission of these reports. However, these reports must be submitted at the end of the postponed period. In addition, awarding agencies may waive the requirement for recipients to notify the agency of problems, delays or adverse conditions related to COVID-19 on a grant by grant basis (200 CPR 200.328(d)(l).

Extension of closeout. (2 CPR§ 200.343)
Awarding agencies may allow the grantee to delay submission of any pending financial, performance and other reports required by the terms of the award for the closeout of expired projects, provided that proper notice about the reporting delay is given by the grantee to the agency. This delay in submitting closeout reports may not exceed one year after the award expires.

What this means for our Principal Investigators:
Employees may be paid for work performed via telecommuting or other means of remotely performing assigned duties. Agreed upon arrangements and terms for working remotely should be documented. During this time of crisis, MSU Denver has implemented provisions to expand its telecommuting options (please refer to https://www.msudenver.edu/coronavirus-update/resource-documents/guidance-from-hr-for-employees/). Thus, salaries for work that contributes to a sponsored project AND is performed according to MSU Denver policy may be charged to that sponsored project.
PIs must not assume that supplemental funding will be available if charging current salaries results in a shortage of funds to carry out the project once full operations are restored. If all available funds for salaries are expended during this slow down in research, there is no guarantee that the funding agency will provide additional funds to complete the work.

Research Continuity Plan Development Guidance
As you develop your plans and complete your form, make the following assumptions:
1. Research infrastructure, such as power and telecommunications, will be maintained.
2. Environmental Health & Safety critical functions will continue.
3. Hazardous waste removal may be delayed.

4. Experiments must be ramped down.

5. Critical supply orders may be delayed.

6. Essential lab supply deliveries may require additional coordination.

7. Access to labs or equipment may be disrupted, limited or suspended for a significant time.

8. Repairs performed by Facilities and other service providers may be delayed.

9. Lab personnel may fall ill and workspace may require decontamination.

10. Lab personnel may require self-isolation and may not be available to perform tasks.

11. Personal Protective Equipment may be limited as gloves and masks may be limited.

12. OSRP will continue to provide proposal development, submission and award management services and COVID-19 related guidance.

PLAN CONTENT

Send a memo/email to all your grant-funded personnel. The memo and plan should:

1. **Prioritize** the health and safety of all personnel.

2. **Remind** personnel to practice recommended personal hygiene measures including washing hands frequently, using hand sanitizer, avoiding touching their face, and covering coughs.

3. **Provide** research assistants and grant staff access to Zoom accounts.

4. **Prohibit** the removal of research materials other than laptops, data, storage devices, etc., from campus. While all federally funded research must continue, it must do so within the confines of appropriate lab space.

5. **Develop** a plan for lab communications (email, VPN access, Microsoft Team, Dropbox, etc.)

6. **Instruct** staff to review current campus travel guidelines.

FORM CONTENT

The research continuity form must list contact information for all essential personnel on active awards. Essential personnel are those who perform critical tasks for the maintenance of the research infrastructure and award obligations. List priority functions, responsible parties and alternate parties should the responsible party become unavailable. List all resources required to telework, such as VPN access, software, and hardware. List critical infrastructure and procedures. Critical infrastructure is anything that must not be powered down because continuous operation is necessary to maintain other critical resources. List the contact information for technicians that need access to specific labs to monitor equipment, if applicable.

OTHER CRITICAL FUNCTIONS TO CONSIDER

- Save samples and results. Ensure all data is available and appropriately backed up
- Verify the functionality and integrity of your data backup plans
- Enact extra cleaning procedures for shared labs and core facilities in "high-touch" environments
- Develop a plan to monitor critical equipment remotely, if applicable
- Forward your office phone to your cell phone
- Identify procedures and processes that require personnel attention
- Update your chemical inventory
- Ramp down, curtail or delay experiments
- Document critical step-by-step instructions for laboratory procedures
- Encourage researchers to be familiar with each other's work if an absence would threaten the research
- Coordinate with researchers to ensure mutual support and coverage of critical activities.

- Review contingency plans and emergency procedures with researchers and staff.
- Maintain a sufficient inventory of critical supplies that may be impacted by shipping delays.
- Ensure that high-risk materials (radioactive, biohazards, chemicals) are properly secured, if applicable

<u>KEEP RESEARCH STUDENTS ENGAGED</u>
Continue to engage student research assistants as they work remotely so that their activities are productive and within the goals of the award. To do so:
- **Ensure** that those involved in research projects have access to information they need to carry out work remotely (e.g., access to literature, existing datasets and research-related files, and meeting software, such as Zoom).
- **Prioritize** data that students can analyze remotely.
- **Require** students/lab techs to finalize any reports, develop PowerPoint presentations for conferences, organize data and engage in ZOOM meetings or conference calls.
- **Track** student productivity by keeping a record of tasks and accomplishments.
- If your students are involved in teaching/learning, then transition to remote groups.
- Use university policy as well as your best judgement to assure that you are not adding financial insecurity to the students' lives at this point.

<u>DOCUMENT DELAYS</u>
If the impact of COVID-19 causes delays in the implementation of grant-funded activities and productivity, document deliverables delayed, create a modified timeline, and request a no-cost extension.

<u>ADDITIONAL INFORMATION</u>
OSRP, Award Management and Compliance – OSRP staff is working remotely and supports ongoing research administration operations (proposal submission, annual reporting, compliance monitoring, etc.). Be advised that we do expect delays in the notification of awards and flexibility with proposal submission deadlines. Federal funding agencies are still working on unified messaging related to award expenditures, allowable activities, NCEs and COVID-19 related costs.

Federal Guidance – OSRP is continuously reviewing guidance from sponsors and will post updates on the OSRP website.

NSF has developed a new website for the research community with detailed guidance on the Coronavirus (COVID-19). This includes guidance for awardee organizations, researchers and reviewers of NSF proposals. Please note that this website will be updated as new developments arise.

National Institutes of Health - General Frequently Asked Questions (FAQs) - Proposal Submission and Award Management Related to COVID-19 (NOT-OD-20-083)

HRSA is following OMB guidance (M-20-17) that was released on March 19, 2020. HRSA has also included an FAQ site to help guide grant recipients through the details at https://www.hrsa.gov/grants/manage-your-grant/COVID-19-frequently-asked-questions

OSRP will continue to provide additional resources, links to federal agency FAQs, and updates as the information becomes available. In the interim, email your questions to ejinks@msudenver.edu.

Stay safe,
Elizabeth (Betsy) Jinks, Director
Office of Sponsored Research and Programs