



UNIVERSITY OF SOUTH ALABAMA

MEMORANDUM

Office of the Vice President for
Research and Economic Development

DATE: July 9, 2020

TO: Faculty and Staff

FROM: Lynne Chronister
Vice President, Research and Economic Development

SUBJECT: University of South Alabama response to the OMB Memo 20-26 *Federal Guidance on Salary and Purchases on Grants through September 30, 2020*

On June 18th, The Office of Management and Budget released OMB Memorandum M-20-26, [Extension of Administrative Relief for Recipients and Applicants of Federal Financial Assistance Directly Impacted by the Novel Coronavirus \(COVID-19\) due to Loss of Operations.](#) This memo gives agencies the authority to extend the salary-charging flexibilities that were already included in the April, 2020, OMB Memorandum M-20-17. However, the University has made the decision NOT to allow this flexibility. Therefore, your salary from the grant MUST reflect actual effort and not reduced effort. The OMB Memo 20-26 impacts all grant supported faculty, staff, post-doctoral fellows and graduate and undergraduate students if they are paid as employees.

The primary rationale for the University's decision is based on the fact that in order to utilize the proffered flexibilities, the University would be required to document that it has taken extensive steps to ***reduce overall operational costs*** and ***exhaust all other funding sources including endowments.***

The Council on Governmental Relations (COGR) and the Association of Public and Land Grant Universities (APLU) provided guidance that such cost-cutting measures include hiring and salary freezes, retirement incentives, furloughs and lay-offs. All other institutional sources of funding, including endowments, are to be used if we were to continue to pay salaries for individuals when effort does not reflect the salary paid from the grant. Also, it will be critical to have written documentation and a plan to reduce other institutional costs (O&M especially) if we were to employ the charging flexibilities.

NOTES:

- The Memo 20-26 authority does NOT include contracts. DoD is also not broadly participating in the added flexibility.
- The Memo 20-26 also provided some flexibility using grant funds for COVID-related research but those should be discussed with the Program Officer prior to transferring funds.

Documentation

While we are not allowing this additional flexibility in salary and effort, the University of South Alabama is requiring that additional documentation be maintained that supports the effort reported on the grant for the period of June 16th through September 30, 2020. According to APLU, “...*the most important message as it relates to a documentation trail is to be intentional and focused on how you initiate and maintain the documentation. It will be critical for your institution to easily be able to refer back to this, possibly several years from now, and show your justification and basis for institutional policies and practices...*” For this reason, the additional documentation is critical. However, we do recognize the burden that it places on the researchers. For this reason, the Office of Research will **not** collect the documentation but will ask that each PI provide a list to your Dean and ORED, of the documents that will be maintained at least through the end of September. Please send a short memo to your Dean and copy Adela Benchea at abenchea@southalabama.edu.

Each program/project may use different methods to track effort but can consider maintaining additional documentation by:

- Purchases of material and supplies,
- Use of animals in research,
- De-identified human subjects’ data reports,
- Annotated laboratory notebooks,
- Publications including submitted abstracts,
- Monthly progress reports (as an extra precaution would be prudent to have them signed by department chairs),
- Recorded Zoom project meetings,
- Other specific project-relevant documentation.

The good news! If the University continues to be on track to re-open mid-August, no additional approvals will be required to continue research and other sponsored projects. In the event that another closure occurs, we will distribute a revised form for approval.

I absolutely understand how confusing and burdensome the additional request is on your time and very much wish this was not necessary. But please feel free to call, email or Zoom me if you would like to discuss any aspects of this notification. Meanwhile, stay well.

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