Boston University Office of the Provost

Professor Jean Morrison, University Provost and Chief Academic Officer

SUBJECT: June 2020 Updated OMB Guidance

BOSTON UNIVERSITY

One Silber Way Boston, Massachusetts 02215 T 617-353-2230 F 617-353-6580 www.bu.edu/provost

TO:	Boston University Faculty
FROM:	Jean Morrison, University Provost and Chief Academic Officer
	Gloria Waters, Vice President and Associate Provost for Research \mathscr{D} .
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The White House Office of Management and Budget (OMB) issued a <u>memo</u> on June 18, 2020 indicating that the "idle time" flexibilities that were set to expire on June 17, 2020 will be extended to September 30, 2020 as long as the funding agency issuing the award concurs. The NSF and NIH have indicated that they will implement this updated guidance, but this is not the case for all sponsors.

As a resource for the BU research community, the Office of Sponsored Programs (OSP) has developed a <u>summary</u> of the COVID-related guidance issued by many different sponsors. For projects experiencing idle time, principal investigators and grants managers are encouraged to review the guidance provided by the relevant sponsor to determine whether idle time is considered an allowable expense. You may also reach out to your OSP research administrator with specific questions.

It is important to note that the OMB memo has added new restrictions on the use of "idle time" flexibilities. They now require that grantees "exhaust other available funding sources to sustain [their] workforce and implement necessary steps to save overall operational costs... in order to preserve federal funds for the ramp-up effort," and "retain documentation of their efforts to exhaust other funding sources and reduce overall operational costs."

Moving forward, faculty who utilize the flexibilities provided by the OMB memo and their funding agency must document any additional funding sources available to them and provide a reason why these sources are not being used to offset costs. Sponsored Programs and Post Award Financial Operations have created a <u>simple template</u> that can be used to produce this required documentation. Please note, this is only necessary for research taking advantage of this flexibility after June 18, 2020.

We recommend that faculty who have experienced disruptions to their research operations review their original budgets to consider opportunities for re-budgeting, use of other nonsponsored funding sources, and/or cost reduction options (including employment actions) in order to meet the original scope of research while taking into consideration additional ramp-up costs. If the scope of your funded work has been impacted by the COVID-19 pandemic, please ensure that is noted in your progress report. Your Sponsored Programs research administrator is available to help guide you through this process.

We know that this is a challenging time to conduct research and appreciate your attention to these issues involving administration of federal funding. We will continue to keep you updated and provide additional guidance as we learn more.