

Federal Award Pay Guidance

The Office of [Management](#) and Budget (OMB) issued guidance offering temporary administrative relief for federal awards during the COVID-19 pandemic. For allowability of salaries and benefits, the guidance states: “Awarding agencies may allow recipients to continue to charge salaries and benefits to currently active Federal awards consistent with the recipient organization's policy of paying salaries (under unexpected or extraordinary circumstances) from all funding sources, Federal and non-Federal.” Keep in mind these OMB exceptions are timelimited and will be reassessed by OMB. Each federal awarding agency is required to issue its own individual guidance for its recipients. Refer to the [OSPA website](#) for more detailed agency information.

The university has adopted an emergency pay policy/guidance consistent with this federal guidance that takes an all funds approach for pay to faculty, staff, students (both graduate and undergraduate), and post docs. The principles governing pay are the same regardless of the source of funds used, including funds associated with federal awards.

Principal Investigators (PIs) should comply with the ISU [Emergency Pay Policy/Guidance Regarding COVID-19 Pandemic](#) and consider the following issues regarding continuing research work and compensation for that work:

1. Is there continuing work that can be accomplished on the award through remote work or other scheduling mechanisms that would allow on-campus work within current social distancing requirements?
 - a. PIs should be creative and flexible in identifying work that can legitimately advance research objectives. PIs should also recognize that work on projects will likely not be as productive, which is understood and acceptable to the university in the context of responding to the pandemic. PIs funding researchers on federal awards have broad discretion to determine what activities will be performed with the funds in pursuit of research goals. Additionally, funding agencies have indicated that they will give grantees wide latitude with respect to deadlines and deliverables. PIs are encouraged to find productive activities for individuals working on grant funded projects to perform when they are unable to work in their labs or other university areas.
 - b. PIs should be creative and flexible in identifying work that can be done remotely and/or safely on campus under current social distancing requirements. This could include allowing work during non-standard hours, rotating schedules, or other mechanisms that allow on-campus work while complying with social distancing recommendations.

2. Is there continuing work that can be accomplished that would otherwise support the core education, research, and extension and outreach missions of Iowa State University?
 - a. The Emergency Pay Policy allows PIs flexibility to engage individuals working on grant funded projects around the core missions of the university, which must continue even in the midst of the COVID-19 pandemic. This may include tasks that are different than an individual's normal duties but are still needed to continue and advance the university's mission.
 - b. In some cases, individuals working on grant funded projects may be asked to perform work on other projects or in other units where there is work available.
 - c. Consistent with the all funds approach required by the OMB, the university will allow individuals working on grant funded projects to be paid for this work, even where duties are different than their normal duties regardless of the source of funds. Funding of these activities stays with the home department/unit/award.
3. If there is no work available consistent the principles in paragraphs 1 and 2 above, PIs should explore what, if any, leave options may exist to mitigate the impact of there being no work available. Where there is no employee benefit leave options, individuals should be directed to HR_delivery@iastate.edu who will provide support in taking advantage of expanded state unemployment benefits where applicable. Student hourly employees are not eligible for unemployment.