

**SALARY PAYMENT UNDER UNEXPECTED or EXTRAORDINARY CIRCUMSTANCES  
POLICY 5.1.01**

**Purpose:**

The purpose of this policy is to address salary and benefits payment of Center for Veterans Research and Education (CVRE) personnel during a time of unexpected or extraordinary circumstances. When such an event may occur, it will be the responsibility of the CVRE Board to declare a situation as an “unexpected or extraordinary circumstance” before the policy can be invoked.

**Scope:**

This policy will cover the allowability of salary, benefits, and other payments for CVRE personnel during unexpected or extraordinary events impacting regular job activity.

**Policy:**

Clinical research

During an event that can negatively impact participants enrolled in a CVRE research trial, face-to-face clinical interaction may be suspended in order to protect both CVRE personnel and participants. During this time, CVRE encourages clinical staff to complete applicable patient communications (e.g., patient visits, follow-up) via telework and telehealth systems. The only exceptions to a suspension of face-to-face clinical research would be if canceling or postponing the activities would increase risk to the subject’s safety or wellbeing or would deprive the participant of necessary clinical care.

Basic and translational research

During unexpected or extraordinary circumstances, CVRE may require that research personnel suspend all basic and/or translational research activities. In these circumstances, the only exceptions may be personnel attending to critical matters as communicated by Minneapolis VAHCS or CVRE (e.g., preservation of essential research materials, essential care of animals).

Personnel will be given as much notice as is practicable to complete or wind down critical ongoing experiments and organize labs for a shut down. Personnel should decide who will be responsible for critical operations (e.g., caring for animals and monitoring the status of samples in freezers and liquid nitrogen storage).

Whenever possible, personnel should continue work under telework agreements and should prioritize project-related work such as data analysis and follow-up, publications, continuing education, compliance documentation, and mandatory trainings.

Paying salaries when research projects are reduced or cannot be completed, or personnel must be redeployed due to unexpected or extraordinary circumstances

CVRE will allow personnel, including those funded by federal and non-federal awards, to continue to charge salaries and benefits to currently active awards from all funding sources, federal and non-federal. Costs may be charged to awards if necessary, to continue critical work even if in a period where primary research activities are limited or curtailed. To the maximum extent practicable, CVRE will invoke or institute any and all reasonable mitigation actions and practices to lessen the cost to the sponsoring agency during the crisis period. Such actions may be part of an existing program or may be created to respond

to the crisis. Appropriate records and cost documentation must continue to be updated and maintained as required.

Any personnel whose workload must be substantially reduced or eliminated due to exhausting all feasible telework that can be conducted under such an event would also be eligible for redeployment to support functions CVRE deems essential. Under these circumstances, CVRE will continue to charge salaries and benefits to currently active awards from all funding sources, federal and non-federal, per sponsor-specific guidelines, or to a dedicated appropriate administrative fund. The administrative fund is limited to no more than 2.5 months of service at a reduced level of effort.

**Procedures:**

Telework

CVRE personnel must gain prior approval from their supervisor.

Redeployment

If CVRE and the CVRE employee's Principal Investigator (PI)/Supervisor determines a need for redeployment of its personnel (e.g., if there is not enough work readily available due to restrictions of teleworking or if a crisis requires work substitution), personnel will be required to enter a work redeployment labor pool if supported by Board-approved funds.

CVRE employees, as WOC Affiliates, are not federal employees and as such should be treated as non-federal employees during this crisis. Therefore, CVRE employees may not be redeployed to support pandemic response activities unrelated to their NPC research or education duties. Although we understand the desire to assist in this time, it is the responsibility of CVRE and its Board to ensure that NPC employees and the organization are protected from any risk.

Sponsor documentation required under limited or curtailed research or redeployment

All personnel whose research work is or will be limited, curtailed, or reassigned must document the delays, cause, impact to the project, actions taken to mitigate delays, and any other relevant facts and details. As soon as possible, PIs/Supervisors must provide this written documentation to CVRE for approval and submission to award sponsors. Sponsors may make allowable determinations as they pertain to their awards.

**Reference Documents:**

OMB Memorandum M-20-17

<https://basicresearch.defense.gov/COVID-19/Frequently-Asked-Questions/>

[https://grants.nih.gov/grants/natural\\_disasters/corona-virus.htm](https://grants.nih.gov/grants/natural_disasters/corona-virus.htm)

<https://grants.nih.gov/faqs#/covid-19.htm>

<https://cdmrp.army.mil/about/covid-19/default>

2 CFR § 200.302 - Financial management

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

2 CFR § 200.403

2 CFR § 200.404

2 CFR § 200.405