

ISSUING INSTITUTIONAL POLICY AND COMMUNICATION DUE TO COVID-19

The recommendations below outline best practices for internal communication and documentation to ensure:

- Ongoing institutional response to COVID-19 is transparent, timely and cohesive.
- Institutional interpretation and policy revisions are appropriately vetted and communicated to all stakeholders.
- Adequate documentation of award actions specifically resulting from COVID-19.

IMPORTANT UPDATE

- [Office of Management and Budget \(OMB\) issued memorandum M-20-26 on June 18, 2020, and some of the previously allowable flexibilities were rescinded, have expired or are no longer applicable.](#)

Governance

How can my institution be enabled to make timely and informed decisions to interpret and respond to federal guidance as well as manage the research impact of COVID?

Recommendation: The COVID-19 pandemic has resulted in the issuances of multiple pieces of federal guidance regarding the management of sponsored proposals and awards during the pandemic. Consistent with the standard federal approach, updates from the Office of Management and Budget (OMB), the National Institutes of Health (NIH), the National Science Foundation (NSF) and other sponsoring agencies require interpretation and application to each research institution's unique circumstances.

Huron recommends that institutions form a cross-functional COVID-19 task force appointed by senior leadership to gather and interpret guidance, recommend policy and assist with dissemination of information to the research community. The task force size will depend on the size of the institution, its research portfolio, and the degree to which operations are centralized or decentralized. In general, the task force should be representative of impacted areas, but small enough to be nimble and respond quickly during this time of uncertainty.

Consider including representatives from the following areas to ensure a comprehensive task force:

- Institutional research leadership (such as the office of the vice president for research)
- Pre- and post-award offices
- Clinical trials office
- Faculty representatives
- Departmental research administrators
- Regulatory compliance (institutional review board (IRB), institutional animal care and use committee (IACUC))
- Internal audit
- Internal communications and training
- Additional subject matter experts as needed, such as general counsel

Charge the task force with:

- Defining an institutional approach to capitalize on administrative and spending flexibilities set forth by OMB and sponsoring agencies.
- Identifying and assigning subject matter experts responsible for researching relevant federal or sponsor guidance and recommending an institutional approach to address specific operational challenges.

- Determining an overall timeline and expectations for the task force or work groups based on prioritized operational challenges.

Developing a communication plan for issuing institutional decisions and direction, including policy and procedure updates.

Communication

How can my institution best communicate business and operational impacts of COVID-19 to our research faculty and staff timely and effectively?

Recommendation: Most institutions established an institution wide communication plan and designated new communication channels with the intent of providing updates related to the pandemic impact to institutional operations in a consistent and easy-to-find manner. In addition, most institutions have preestablished communication channels to connect and share information with research faculty, staff and other stakeholders. These channels should be the foundation for a COVID-19 communication plan.

Huron recommends that institutions designate specific communication channels to disseminate COVID-19-related information to the research community, ideally aligning with any communication channels your institution has already dedicated to COVID-19 communications across the institution. Leverage existing research-specific communication approaches, such as the vice president for research website, research newsletters, group email lists or existing research community forums to provide new information and communicate regularly with the research community. This ensures regular communication dissemination via established and widely used communication channels.

Designate a communication liaison within the task force to coordinate frequent updates from subject matter experts concerning their respective areas. Establishing a dedicated communication liaison will ensure that all research-related communication related to COVID-19 is streamlined and consistent, helping to develop communications in a consistent tone and voice.

Recommendation: Huron recommends institutions designate a new section of the research website to centrally provide all research-related updates, institutional guidance and specific procedures to manage the impact of COVID-19 on research. In developing the website, consider how best to organize content to direct users to specific focus areas such as proposals or pre-award processes, sponsored expenditures, sponsor deliverable management, human subjects research, etc. The COVID-19-dedicated research website should incorporate the following content:

- Institutional policy and procedure addendums and forms specific to COVID-19 requirements and exceptions
- Names of task force representatives and other appropriate division contacts
- Links to federal and agency-specific guidance and resources
- Links to research-related organizations and associations (e.g., the National Council of University Research Administrators (NCURA), the Society of Research Administrators (SRA) International, the Council on Government Relations (COGR))
- Staff updates (e.g., updates or reminders on paid leave policy, facilities access)
- A frequently asked question (FAQ) portal that allows visitors to submit questions or concerns for response by institutional experts

To promote accessibility in remote work environments and to encourage faculty and staff to check back often, consider making this website externally facing for ease of access to all stakeholders in the event the internal website is not widely accessible. Maintain sensitive information pertaining to the institution's COVID-19 response behind the institution's firewall.

The task force communication liaison should maintain the website and serve as the primary source of COVID-19 institutional information. Content should be regularly updated as interpretations and institutional decisions are made by the task force and as additional federal guidance is released.

When content on a COVID-19 webpage is no longer deemed necessary by the institution, other relevant COVID-19 information and released guidance should continue to be disseminated via existing, non-COVID-19-specific institutional communication vehicles. For example, the COVID-19 website should redirect individuals to existing research websites used for general communication (e.g., the pre-award and post-award intranet site, VPR webpage)

Recommendation: Establish a FAQ form on the COVID-19 research website. This provides the campus community with an easy, potentially anonymous forum to ask questions, make comments and express concerns without having to navigate away from the COVID-19 website. The FAQ form should have a drop-down menu for topic type as it relates to visitor questions (general question, pre-award question, post-award question, research compliance, etc.) that automatically sends and directs questions to an appointed subject matter expert in that area once submitted. For example, if an individual submits a pre-award question, this would automatically be routed to the appointed pre-award expert for response. Additionally, the FAQ form allows the institution to establish trends in the types of questions being asked so that guidance can be published more broadly to address commonly asked questions or address common concerns.

Recommendation: Update all institutional research web content (e.g., sponsored programs website, VPR website) specifically to ensure information, such as staff names and contact information, is accurate. Each unit webpage should include a clear message, ideally at the top of the page, that provides details related to remote and on-campus work and notification of any disruptions in services and/or response time.

At a minimum, unit websites should:

- Address any possible communication lapses and disruption to business operations.
- Outline staff coverage plans in the event of service lapses or disruptions.
- Identify preferred technology for necessary video-enabled virtual meetings (e.g., Zoom, Skype, Teams).
- The COVID-19 updates provided on unit websites will inform the campus community of more specific process and procedure modifications unique to that unit. Additionally, by providing relevant COVID-19 updates on unit websites, the information and resources will have a broader reach to individuals who are not aware of, or have not yet visited, the institution's COVID-19 website.

Recommendation: Create a COVID-19 electronic newsletter (distributed via group email) to highlight recent updates and new information that may not be easily called out via the COVID-19 research website, and redirect individuals to the website for additional details. The frequency of the newsletter will be dependent upon the pace at which new federal or sponsor guidance is issued and addressed by the task force. It is likely that the newsletter frequency will be greater during the triage and stabilization phases (e.g., weekly or biweekly) and taper as the institution transitions to the transformation stage (e.g., quarterly).

How should my institution communicate research delays to our sponsors?

Please keep in mind that some of the flexibilities outlined within this recommendation may have expired or have been rescinded, per [OMB memorandum M-20-26](#).

Recommendation: Federal sponsors have acknowledged the possibility of significant delays in programmatic research progress and have asked that institutions communicate with the sponsor's program manager to provide details on the impact to research projects resulting from COVID-19. Further, sponsors have clarified the responsibility of institutions to internally document the specific impacts of COVID-19 on the research project, including the length of the interruption to operations.

Huron recommends that institutions issue proactive communication to avoid financial losses and future funding delays. To start, coordinate between research administrators and principal investigators (PIs) to identify all active awards that may experience significant research delays. Awards experiencing delays greater than three months should be systematically flagged (e.g., via a new flag in the financial system), and the cause of the delay and the current plan to complete the research should be formally documented as part of the award file or record. In cases of these extreme delays, institutions, represented by the appropriate institutional official (as opposed to the PI), should proactively communicate with the sponsor program manager, notifying them of the COVID-19 impacts on the project.

The "Managing Financial and Technical Reporting Delays Due to COVID-19" document includes additional detailed recommendations on communications approaches and strategies.

Institutional Policy

How should my institution document policy driving award activities to manage the COVID-19 response?

Please keep in mind that some of the flexibilities outlined within this recommendation may have expired or have been rescinded, per [OMB memorandum M-20-26](#). **Recommendation:** Federal sponsors have consistently reiterated the need for institutional actions and approaches to manage the COVID-19 response, especially as it relates to sponsored project expenditures, to be consistently applied and in alignment with institutional policy. However, many institutions do not have a preestablished policy that directly relates to the COVID-19 scenario at hand.

Huron recommends that institutions leverage what policies may already be in place that can provide a baseline standard to guide institutional approaches to the COVID-19 pandemic, such as emergency response or disaster policies. With these policies as a foundation, institutions should develop a collective policy *addendum* to address all updates, interpretations, and clarifications to sponsored project administration and research policies specific to COVID-19 impacts.

Huron does not recommend the creation of new policies where they do not currently exist or formal revisions to existing policies that address challenges unique to this specific time. Given that guidance is rapidly changing or expanding during this time, an addendum allows for increased flexibility and a more expedient publication of institutional policy. Federal administrative and financial flexibilities are currently extended for only a short-term period (e.g., 90 days) and therefore do not currently warrant folding these exceptions into existing policies. The creation of a policy addendum saves the time required to create new policies where they do not currently exist or revise existing policies through a potentially extensive review and approval process.

In line with federal guidance regarding administrative and financial flexibility allowed due to COVID-19, the policy addendum should set forth:

- Roles and responsibilities for COVID-19 compliance.
- Documentation required to substantiate expenditures resulting from operational, administrative, or programmatic changes due to COVID-19.
- Documentation required to define and describe programmatic research delays due to COVID-19.
- Required institutional review and approvals for award actions related to COVID-19.
- Reference to procedures, including any institutional prescribed forms or templates developed to fulfill COVID-19-specific requirements.

Specific research administration policies to address in the addendum may include, but are not limited to:

- Prior approval requests (no-cost extensions, award modifications)
- Direct charging to sponsored projects
- Salaries charged to sponsored projects
- Effort certification
- Cost transfers
- Travel expenses or reimbursements
- Federal purchasing requirements
- Financial reporting
- Award closeout

Link the policy addendum directly to the COVID-19 website in addition to any institutional websites where existing policies are provided.

Next Steps

How can I leverage current stabilization efforts to improve institutional readiness in case of future events that impact business continuity?

Recommendation: As your institution transitions from triage to stabilization to transformation, the task force should shift focus to the long term. There will inevitably be lessons learned during this time that should be leveraged to develop or refine disaster recovery and/or business continuity plans. Consider expanding the task force responsibilities to include a risk assessment of the research enterprise that feeds into the overall institutional emergency preparedness and response effort. Areas that the task force could address within the research realm may include:

- Gaps in existing business continuity plans
- Clarification of essential and nonessential business, research and lab operations
- Institutional readiness for remote work such as data availability, data security, lab security, etc.
- Protocols for shifting research activities to remote work sites
- Technology needs
- Policy and procedure enhancement