



POLICY: Salary Payment Under Unexpected or Extraordinary Circumstances

1.0 PURPOSE

The purpose of this policy is to address salary and benefit payments of Veterans Health Foundation(VHF) personnel during a time of unexpected or extraordinary circumstances.

2.0 SCOPE

This policy will cover the allowability of salary, benefits, and other payments for VHF personnel during a time when unexpected or extraordinary events may impact regular job activity.

3.0 POLICY

A. Clinical Trials

During an event that can negatively impact participants enrolled in an approved VA trial, face-to-face interaction may be suspended in order to protect both VHF personnel and participants. During this time, VHF encourages staff to complete the necessary patient communications (e.g. follow-up visits, questionnaire completion etc.) 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.

B. Basic and Translational Research

During unexpected or extraordinary circumstances, VHF may require that research personnel suspend all basic and/or translational research activities. In these circumstances, the only exceptions may be for personnel attending to critical matters as communicated by VA Pittsburgh or VHF (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 make arrangements for 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.

- C. Project cannot be completed, or personnel must be redeployed due to unexpected or extraordinary circumstances

VHF will allow personnel, regardless of funding source, to continue to charge salaries and benefits to currently-active awards. 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, VHF 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 VHF deems essential. Under these circumstances, VHF will continue to charge salaries and benefits to currently-active awards from all funding sources, federal and non-federal, even if the redeployment involves substantially dissimilar work. All efforts will be made to preserve jobs during unexpected and extraordinary circumstances, but VHF personnel remain at-will employees and VHF reserves the right to terminate personnel at any time and for any reason.

If VHF 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.

4.0 PROCEDURES

- A. Employees must have or request approval for telework from their supervisor and VHF's Executive Director.
- B. The following documentation is required by the PI for any grant funded personnel whose research work is or will be limited, curtailed, or reassigned.
 - i. Delays, cause and impact to the project.
 - ii. Actions taken to mitigate delays, and any other relevant facts and details.
 - iii. Communications received from sponsor or funding agencies.

5.0 Definitions

Unexpected or extraordinary circumstances- Circumstances that are beyond the control of The Veterans Health Foundation or VA Pittsburgh Healthcare System, including but not limited to an epidemic or pandemic, a natural disaster.

6.0 RELATED DOCUMENTS

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

https://grants.nih.gov/grants/natural_disasters/corona-virus.htm

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

OMB Memorandum M-20-17

<https://www.whitehouse.gov/wp-content/uploads/2020/03/M-20-17.pdf>

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

VHF Policy on Telecommuting and Remote Work Agreement

6.0 REVISION HISTORY

Revision Letter	Author	Revision Date	Description of Changes
A	A. Caffas		Original policy

RECERTIFICATION: This policy is scheduled for recertification on or before the last working day of March , 2023