

COVID-19 Agency Salary Charging Rules if Unable to Work Remotely*

***Note about working remotely:** This assumes that an individual is able to work, but cannot because the institution has dire apply.

| Federal Agency <i>In a nutshell, can you charge salary for non-work?</i> [YES, NO, ...] | Charge Salary if Unable to Work Remotely? <i>Details of requirements.</i> | Comments |
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| LARGE FEDERAL AGENCIES | | |
| | | <p style="text-align: right;">awards@da.gov to consult with a grants specialist about the organization's specific circumstances.</p> |
| Department of Defense: All Components [YES] | The DOD will allow recipients to continue to charge salaries and benefits to currently active awards consistent with the recipients' policy of paying salaries (under unexpected or extraordinary circumstances) from all | Limited to currently active awards for personnel who would normally be paid out of the award (e.g., graduate student federal awards) |

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| | | interruption of operations or services |
| National Aeronautics and Space Administration (NASA) [YES] | Recipients are authorized to continue to charge salaries and benefits to currently active NASA awards consistent with the recipients' policy of paying salaries (under unexpected or extraordinary circumstances) from all funding sources, Federal and non-Federal. | When salaries and other project activities are charged to an award as a result of the COVID-19 crisis, the award recipient must notate in their records that the expense was incurred for this reason. |

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| | <p>maintain records and documentation to substantiate the cost, including reference to the recipients' salary policy. Concurrent with programs, recipients will need to assess the impact on their programmatic activities that were originally funded once normal activities resume as there is no guarantee of additional funding.</p> <p>See: General Funding and Grants Frequently Asked Questions</p> | <p>their FAQs). Stay tuned for more information.</p> |
| <p>Corporation for National and Community Service [YES]</p> | <p>It may be allowable to continue to pay active/current Senior Corps grant-funded staff members their hourly pay or salaries under the grant. First, the Senior Corps grant recipient's policies must allow for the charging of the continuation of hourly pay or salaries under the grant award during a period when no work is performed due to unexpected or extraordinary circumstances. Second, the policies must apply regardless of the funding source, including, federal and non-federal sources. Third, these pay policies <u>must</u> be applicable to the grant recipient's entire workforce. If these three conditions are satisfied, then such charges to the Senior Corps grant award will be allowable. See 2 CFR part 2205.</p> <p>See: CNCS Coronavirus Disease 2019 (COVID-19)</p> | <p>Valid for 90 days from date of OMB memo (end date will be June 17th unless extended by OMB).</p> |

Department of Defense: **USAMRAA**
[YES]

See DOD All Components rules plus:
[USAMRAA's Supplemental Guidance on Administrative Flexibilities for Grants and Cooperative Agreements in Response to COVID-19 Pandemic \(3/25/20\)](#)

**Administration
(HRSA)**

ES&S

recipients may continue to charge salaries and benefits to currently active awards consistent with their organization's policy of paying salaries under unexpected or extraordinary circumstances) from all funding sources, federal and non-federal.

See: [COVID-19 Grantee Frequently Asked Questions](#) n6f228 0 T11.04 0 0 11.04 153.84 718.45 606

Recipients must, as required by 2 CFR 200.405, ensure that personnel costs charged to EPA grants are distributed in proportion to the benefits accruing to the EPA funded project. For example, if 100% of the employee's compensation has been charged to the EPA grant throughout the performance period then the recipient may continue to charge 100% of the employee's time to the grant even though project performance has been interrupted. For employees whose compensation is only partially charged to the EPA grant, the recipient must make a reasonable