

# Guidance for Navigating Federal Research Policy Changes

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Dear Research Community,

As you may be aware, recent federal policy updates, including OMB Memo M-25-13, have introduced new requirements and adjustments affecting federally funded research projects. These adjustments include an immediate pause on the disbursement of grants and loans while federal agencies conduct a comprehensive review. Coupled with other Executive Orders issued by the administration, these changes are reshaping certain research practices, priorities, and compliance requirements.

We are actively reviewing these updates alongside federal agencies and sponsors to understand their implications for your work. The following guidance aims to address these developments and provide actionable steps to ensure continued compliance and operational continuity.

## 1. Communication from Federal Program Officers or Agencies

Effective communication is critical during this period of federal funding reviews and potential project adjustments. Timely sharing of information with institutional offices ensures that appropriate action can be taken to address changes, compliance updates, or funding modifications. Centralizing communication also minimizes confusion and ensures alignment across the university.

### *Guidance for Action*

- **Forward Agency Communications:** Send any correspondence from federal agencies, including emails, letters, or notifications, to [vpr@american.edu](mailto:vpr@american.edu).
- **Include key detail:** Ensure the following information is included if available:
  - The original correspondence in full (email or scanned copy of letters).
  - Your project's award or proposal number.
  - A brief description of the context, if relevant (e.g., "Received notice of potential suspension").
- **Notify Early:** If you anticipate receiving significant updates from sponsors (e.g., stop-work orders or funding modifications), notify our office immediately so we can provide guidance.
- **Use Designated Points of Contact:** Avoid direct responses to federal agencies without coordinating with our office, as we need to ensure consistency and compliance in institutional communications.
- **Keep Stakeholders Informed:** Share any project updates or directives you receive with your team and collaborators to ensure alignment on next steps.

## 2. Stop-Work Orders, Terminations, and Suspensions

Some federally funded projects may be subject to stop-work orders, terminations, or suspensions. In such cases, only costs incurred up to the specified date in the stop-work notice will typically be reimbursable.

### *Guidance for Action*

- **Notify Office of Research:** Immediately forward any communication received from your program officer to the Office of Research.
- **Halt Activities:** If a stop-work order is issued, immediately suspend all activities specified in the notice.
- **Retain Records:** Maintain detailed records of all costs and communications for audit and closeout purposes.
- **Communicate with Stakeholders:** Notify team members and collaborators promptly of any changes to project status.
- **Submit Final Reports:** Submit any required reports or deliverables in accordance with the stop-work notice.

### 3. Future Award Notices

During the review period, federal agencies are not issuing new award notices. Programs may face delays, reduced funding, or cancellation. We anticipate delays in the release of new funding decisions and will adjust as necessary.

#### *Guidance for Action*

- **Anticipate Delays:** Expect delays in the release of new awards and adjust project timelines accordingly.
- **Avoid Financial Commitments:** Do not incur costs based on anticipated awards until funding is officially obligated.
- **Maintain Communication:** Stay in close contact with your program officers to understand how this freeze may affect your pending awards.

### 4. At-Risk Accounts

The funding freeze introduces uncertainties for projects awaiting federal award notices. Institutions may hesitate to approve new at-risk accounts due to potential delays or changes in funding.

#### *Guidance for Action*

- **Pause New At-Risk Requests:** Avoid initiating new at-risk accounts until funding becomes more certain.
- **Reassess Existing Accounts:** Review current at-risk accounts for financial exposure and take steps to minimize institutional risk.
- **Proceed Cautiously:** If critical projects require at-risk accounts, work closely with your institutional office to ensure alignment with known federal priorities.

### 5. Active Awards

Federal agencies have issued guidance emphasizing that existing terms and conditions for active awards remain enforceable unless formally amended. However, compliance requirements, such as export controls or research integrity standards, may be updated.

Additionally, recent executive orders direct federal agencies to immediately halt all Diversity, Equity, Inclusion, and Accessibility (DEIA) activities. We anticipate that this mandate will influence how sponsors manage DEIA-related components in active awards, but sponsor guidance for individual awards will determine how to proceed. We are closely monitoring communications to ensure compliance with any updates.

### ***Guidance for Action***

- **Sponsor Communication:** Forward all sponsor communications to [vpr@american.edu](mailto:vpr@american.edu) for review and guidance.
- **Continue Activities:** Continue all approved project activities unless a specific modification or stop-work order is issued.
- **Review Agreements:** Regularly review your grant agreement to ensure compliance with all terms and conditions.
- **Stay Prepared for Adjustments:** Be ready to modify or reallocate DEIA-related activities or costs depending on forthcoming sponsor instructions or institutional decisions.  
**Prepare for Compliance Changes:** Stay prepared for potential updates to compliance requirements (e.g., export control, IRB, IACUC) and act promptly to meet any new obligations.

### ***Additional Information for Spending on Active Awards:***

When an award is signed, the federal agency designates a portion of the total approved budget as obligated funds. AU, as the recipient, is authorized to incur expenses up to the obligated amount, and these expenses will be reimbursed. Any expenses that fall within the scope of the award, the period of performance, and are covered by obligated funds will be reimbursed. However, any future expenses exceeding the current obligation or incurred outside of the award period of performance will not be reimbursed.

## **6. Subrecipients**

Funding for subawards follows the same principles as primary awards. Expenses incurred by subrecipients up to the obligated amount and within their award period of performance must be reimbursed, but future expenses beyond the current obligation may not be.

### ***Guidance for Action***

- **Communicate Changes:** Coordinate with OSARA to notify subrecipients of any changes to funding or project requirements immediately.
- **Monitor Subawards:** Ensure subrecipient activities align with current obligations and project scopes.
- **Provide Oversight:** Work closely with subrecipients to address compliance and budgetary concerns.

## **7. Procurements**

Procurement policies depend on the availability of obligated funds. Federally obligated funds continue to be reimbursable for allowable costs; however, delays in obligation or future funding are possible. Agencies may implement stricter rules for spending during this transition period.

### ***Guidance for Action***

- **Confirm Funding:** Ensure that funds are obligated before making purchases. If funding has not yet been obligated, consider postponing procurement until funds are secured.
- **Proceed with Caution:** If funds are obligated, continue to procure equipment and materials necessary for your project while monitoring budget balances.
- **Review Vendor Terms:** When obtaining vendor quotes, request details on the country of origin and ensure pricing commitments remain valid for a specified period.

## 8. Travel

Federal agencies may suspend travel for federally funded projects. Pre-approved, obligated funds may still be used for critical travel, but non-essential travel is discouraged.

### *Guidance for Action*

- **Reconfirm Approvals:** Verify travel plans with the funding agency and confirm whether travel remains authorized.
- **Avoid Non-Essential Travel:** Refrain from scheduling or undertaking non-critical travel until further notice.
- **Document Expenses:** Retain records of approved and reimbursed travel expenses for auditing purposes.

## 9. Reporting

Changes to reporting requirements may be implemented as federal agencies adjust their oversight mechanisms. Late or incomplete reporting could jeopardize funding.

### *Guidance for Action*

- **Submit on Time:** Ensure all reports and deliverables are submitted by their deadlines.
- **Reconfirm Requirements:** Review award documentation and any sponsor updates for changes to reporting expectations.
- **Coordinate with Sponsors:** Communicate with your program officer to clarify reporting timelines or expectations if needed.

## 10. Proposals

At this time, Federal submission systems remain operational, and sponsors continue to accept proposals. However, timelines for sponsor review and decisions may be delayed due to pauses in funding areas or administrative transitions. Additionally, federal solicitations are being updated to exclude DEIA-related components.

### *Guidance for Action*

- **Submit Proposals:** Continue submitting proposals by their stated deadlines unless otherwise notified by the sponsor.
- **Verify Deadlines:** Regularly reconfirm proposal deadlines as they may be subject to change.
- **Adjust Content:** Remove any DEIA-related components from proposals in response to updated sponsor requirements.
- **Sign Up for Alerts:** Subscribe to updates from relevant federal agencies or sponsors to stay informed of changes.

## Next Steps

We recognize that these changes may raise concerns or present challenges. We are here to support you through these changes and provide the tools, resources, and guidance needed to navigate this continually shifting landscape. By working collaboratively, we can adapt, persevere, and overcome these challenges as we work to push research at AU forward together.

If you have any questions or encounter challenges not covered in this document, please contact the Office of Research at [vpr@american.edu](mailto:vpr@american.edu).