

## **UGA Office of Research Federal Funding Updates - FAQ**

**Revised 04/23/2025**

### **PROJECT TERMINATIONS & STOP WORK ORDERS**

#### **How many sponsored project terminations has UGA received?**

As of mid-April, 2025, UGA has received approximately 25 sponsored project terminations.

#### **I received a notice of termination or stop work order. What should I do?**

Be advised that notices of termination and stop work orders include:

- specific project identifiers (PI name, project title, award number);
- explicit statement of project stop, suspension, or termination;
- a reason/basis for the change; and
- Identification of an effective date.

If you receive any notices of termination or stop work orders, please immediately forward the communication to Sponsored Projects Administration (SPA) at [sponprog@uga.edu](mailto:sponprog@uga.edu). Additionally, please stop working on the project, do not incur any additional expenses, [remove salary encumbrances](#) and cancel open purchase orders for supplies, services or equipment.

Please do not take any action on outbound subrecipients. Once the termination notice/stop work order is routed to SPA, SPA will review the communication, create a modification in the Grants Portal, notify all outbound subrecipients, and contact PI/Unit regarding next steps as appropriate.

If you are uncertain if something is a notice of termination or a stop work order, please forward it to [sponprog@uga.edu](mailto:sponprog@uga.edu) for review.

#### **I received instructions to pause work. What should I do?**

Please forward the communication to [sponprog@uga.edu](mailto:sponprog@uga.edu) and allow time for review. Sponsored Projects Administration will provide guidance on next steps.

#### **SPA has confirmed my project has been terminated or is subject to a stop work order. What work can I continue to do?**

The stop work order identifies a specific date by which all work must cease. No work can continue beyond that date until further notice.

**What expenses can be charged to a terminated project, or a project under a stop work order?**

The [Uniform Guidance 2 CFR 200.472](#) identifies allowable costs when termination occurs, or a stop work order is imposed. Expenses incurred on or prior to the effective date can be charged to the project.

Any expenses incurred after the effective date must meet the Uniform Guidance requirements. SPA will need to ensure there is appropriate justification for each expense incurred/processed after the effective date.

The above [guidance](#) pertains to UGA/UGARF as well as our subrecipients, consultants, vendors, etc. For more information, email [sponprog@uga.edu](mailto:sponprog@uga.edu).

**If my terminated/suspended project has subrecipients, who will notify my subrecipients?**

SPA will notify all subrecipients as stipulated by required process for amending subrecipient agreements.

**If my project terminated/suspended project has consultants or vendors with open purchase orders, what should I do?**

PI/Unit should work with UGA Procurement to terminate the open purchase orders.

**My subrecipients invoiced me after the termination/suspension effective date, but their expenses were incurred prior to the effective date. Are these expenses allowable?**

Yes. These expenses should include a justification showing that the expenses were invoiced after the effective date but incurred prior to the effective date. This is essential since our sponsor may question these expenses.

**If I am processing expenses after the termination/suspension effective date, is there anything I need to do differently?**

The expenses should be justified (as described above). All projects under a termination or stop work order have been financially shut down to ensure no additional expenses are processed against them. If you have one of the above unique circumstances—**then prior to routing the expense through UGA systems**—you must contact Brad Langford ([langford@uga.edu](mailto:langford@uga.edu)) and Callie Mobley ([cadams14@uga.edu](mailto:cadams14@uga.edu)). Callie will “open” the project so you can process the expense(s). Then she will “close” the project to avoid additional expenses.

**My sponsor sent me an email stating there will be additional financial reporting requirements for my terminated or suspended project. What do I need to do?**

Please forward the communication to [sponprog@uga.edu](mailto:sponprog@uga.edu) with a subject line of Federal Transition. Please allow SPA time to review and provide guidance on next steps. In most cases, SPA Post Award will oversee these additional financial requirements. If SPA contacts you requiring your assistance to meet these requirements, please be timely in your responses.

**AWARD MANAGEMENT**

**I received an award notice, and the budget was cut by 70%. Why did this occur?**

While the federal government is under a Continuing Resolution and during federal transitions, it is common to receive partial funding. Please read your award notice. During these times, the award notice often states the sponsor “is currently operating under a Continuing Resolution.” Awards are usually partially funded with the anticipation of increasing the award level once the federal budget is balanced.

**Colleagues across the country have said NIH eRA Commons no longer displays the No Cost Extension button which allows institutions to exercise their one-time, up to 12 months, no cost extension. Why and what should I do?**

UGA has not experienced this issue. As of April 23, UGA was able to successfully submit no-cost extensions to NIH.

**How is UGA responding to agency IDC rate caps?**

While two federal agencies – National Institutes of Health and Department of Energy - have issued communications citing a 15% Indirect Cost (IDC) Cap, both policy changes are suspended

under nationwide permanent injunction and temporary restraining orders that pause the IDC Rate change pending the outcome of litigation and appeals.

**Are there any anticipated delays in reimbursements or payments from federal agencies?**

Yes. As the federal government has added requirements to ensure reimbursements/payments align with current priorities, UGA has experienced delays with payments. SPA is addressing these as usual. Faculty should continue conducting their sponsored activities and meeting deliverable/milestone requirements as usual. Faculty should not perceive a delay in payment as a stop work order or a termination.

**I have NIH funding and learned NIH has a new Civil Rights Term and Condition. Is there anything that I need to do?**

We are aware of a new [NIH Civil Rights Term and Condition](#) that went into effect 4/21/25. We are analyzing the provision now and will provide further guidance in the coming weeks. No action is required of principal investigators or unit research administrators at this time.

**PROPOSAL SUBMISSION**

**I submitted a proposal, which received a favorable review, but I have not received the award yet. Why?**

While the federal government is under a Continuing Resolution and during federal transitions, it is common to experience delays in receiving new awards. In addition, some agencies are engaging in additional reviews prior to award to ensure the project is aligned with the agency's priorities under the new administration. Please continue to monitor the status of your proposal via the sponsor's website.

**I am preparing a proposal to be submitted to NIH. What IDC Rate should be used?**

Currently, the NIH 15% IDC Rate limitation remains paused by a nationwide permanent injunction pending appeal. Therefore, in accordance with the UGA Indirect Cost Policy, when submitting proposals to all sponsors, please use the Federally Negotiated Indirect Cost Rate unless the sponsor or funding opportunity has a written, publicly available IDC Rate Restriction. For NIH and NIH flow-through proposals, please make certain to include the italicized language below in the Budget Justification:

- *Given the permanent injunction pertaining to NOT-OD-25-068 in effect at this time, this proposal includes the indirect cost rate contained within the UGARF/UGA Federally Negotiated Indirect Cost Rate Agreement. We understand that the IDC Rate applicable to this project may be subject to change as the situation develops.*

**I am preparing a proposal to be submitted to the Department of Energy. What IDC Rate should be used?**

Currently, the Department of Energy 15% IDC Rate limitation remains paused by a nationwide Temporary Restraining Orders issued by a federal court. Therefore, in accordance with the UGA Indirect Cost Policy, when submitting proposals to all sponsors, please use the Federally Negotiated Indirect Cost Rate unless the sponsor or funding opportunity has a written, publicly available IDC Rate Restriction. For Department of Energy and Department of Energy flow-through proposals, please make certain to include the italicized language below in the Budget Justification:

- *Given the Temporary Restraining Order(s) in effect at this time, this proposal includes the indirect cost rate contained within the UGARF/UGA Federally Negotiated Indirect Cost Rate Agreement. We understand that the IDC Rate applicable to this project may be subject to change as the situation develops.*

**A previous Office of Research communication instructed me to contact Jill Tincher or Cathy Cuppett in SPA for all NIH proposals. Do I still need to do this?**

No. These instructions were initially provided when NIH announced a 15% Indirect Cost limitation for Institutions of Higher Education (IHEs). Currently, the limitation continues to be constrained by one or more Temporary Restraining Orders issued by federal courts. Accordingly, you do not need to contact Jill or Cathy for all NIH proposals. Please continue to use the Federally Negotiated Indirect Cost Rates unless the sponsor/funding opportunity has a written, publicly available IDC Rate Restriction.

**OTHER TOPICS**

**Have agency review panels been reactivated?**

Most federal agencies have resumed reviewing proposals. The National Institutes of Health, National Science Foundation, Department of Energy, National Aeronautics and Space Administration, Department of Interior, National Oceanic and Atmospheric Administration, and

other federal agencies have resumed study sections, advisory council, and scientific review meetings.

**I am seeing considerable news coverage and emails from our sponsors related to DEIA. What should I do?**

Please await project-specific guidance from your sponsor. Once you receive it, please forward it to [sponprog@uga.edu](mailto:sponprog@uga.edu) for further assistance.