CSU FAQs on Federal Government Shutdown

1. Are proposal submissions permitted during the shutdown?
   Although the answer is agency specific, most agencies probably will not accept proposals during the shutdown. We will have to wait and see.

2. My PI has a proposal due during the shutdown. Will the deadline be revised once the shutdown has ended?
   As with past federal government shutdowns, we are anticipating that any impacted deadlines will be revised and republished. Once the specific agency is back open for business, please watch for revisions from those agencies on impacted deadlines.

3. Am I permitted to establish an Advance Account knowing that my federal award is delayed due to the shutdown?
   If you have a pending award that is in process and is significantly delayed due to the lapse in government funding, you may consider the establishment of an advance account.

4. Can I continue to expend on an existing federal award?
   Yes. As long as the period of performance remains open and you have project funds to expend, you may continue to expend on your existing federal awards.

5. What if my project is subject to a stop-work order during the shutdown?
   Although CSU has received a few stop-work orders during past shutdowns, most of the orders specifically forbid the use of federal facilities during the shutdown. If you receive a stop-work order, please forward it directly to the attention of your team in Sponsored Programs. We will review the order to determine its impact on your project.

6. What if I have a progress report due during the shutdown?
   As with other deadline-related issues, the answer is agency specific. Progress reports dependent upon submission systems like NSF’s FastLane cannot be submitted during the shutdown.

7. What if my project is in need of a no-cost time extension during the shutdown?
   Please contact your team in Sponsored Programs. Dependent upon the terms of the original award, we may be able to assist you in issuing a no-cost extension.

Proposals:

OSP will continue to review, approve and submit proposals to federal sponsors to the greatest extent possible.
Awards:

We expect the following to occur:

- No awards will be issued by federal sponsors during the funding lapse [shutdown].
- Award actions under negotiation at the time of the shutdown and multi-year contracts that end after the current fiscal year ends may be put on hold by the sponsor.
- Federal employees (e.g., Program Officers, Grants Management Specialists, Contracting Officers) will not be available to conduct routine business.
- Work on federal awards currently in hand may continue to the extent that funding is available and such performance does not require federal staff intervention, unless the federal sponsor issues a stop-work order. In most cases, a stop-work order is issued directly to OSP, who will receive a project-specific notice from the federal sponsor. OSP will inform the PI and department. If a PI gets a notice directly, the PI’s OSP team should be notified immediately. Projects funded by contracts or cooperative agreements are more likely to receive stop-work orders or performance suspension notices than projects funded by grants.
- Spending on awards and award modifications not yet received is the decision of the unit that will administer the award since that unit will then take financial responsibility if the award is not forthcoming. OSP will continue to review and approve or disapprove, as appropriate, requests for preaward spending. Department chairs, unit directors, and deans should carefully consider the additional risk caused by the shutdown and discuss each request with OSP prior to endorsing such requests.
- There are broad factors (e.g., the length of the funding lapse), as well as subtle nuances and details (e.g., type of award, appropriation source, federal employee involvement, etc.) that will impact CSU’s continued performance under our federal awards. Please direct questions regarding the shutdown’s impact on your current awards to your OSP Team.

Interagency Personnel Agreements (IPAs):

Individuals working for the government through Interagency Personnel Agreements (IPAs) should follow the instructions issued to them from their government supervisor. We expect that these individuals may already have been instructed not to report to work. They will, however, as Colorado State University employees, be paid for their time. If a shutdown occurs and lasts for an extended amount of time, or if agencies indicate that government pay may be impacted, OSP will notify IPA personnel and work with them to determine any actions necessary to alter the terms of their contracts to adjust their appointment statuses.