



# Considerations when Preparing for the Federal Government Shutdown

Updated: September 26, 2023

NOTE: This is a list of items institutions should consider in the likelihood of a government shutdown to manage federally sponsored projects. *This list is not official guidance* but rather a cumulation of past shutdown experiences with information and guidance that has been received to date. *This list is a starting point and not exhaustive of all considerations* and will be updated accordingly as more information is gathered and released.

## Campus Notification

- **Coordinate a campus communication plan (e.g., notices, websites, etc.)** with proactive preparation tips. Communicate with campus leaders about the potential impacts and consider developing tools to monitor the burn rate of expenses on federal awards.

## Proposals & Application Systems

- **Proposal preparation systems** are expected to still be online during a shutdown. However, it is expected that proposals will not be processed by agencies until normal operations resume. Watch for announcements from agencies for extensions of deadline dates. There is a possibility that the Grants.gov Contact Center will remain available. However, it's unclear if all Help Desks systems will remain functional.
- **Peer reviews/study sections** are not expected to occur, which may impact faculty who are reviewers and potential delays in start dates for those whose proposals are awaiting review (if the shutdown is prolonged). Institutions may need to grapple with payment issues related to canceled travel.

## Award Management

- **Drawing cash and payments.** This depends on the agency and the system the agency uses. However, we recommend processing payments now. Most likely, these systems will not be available, and no payments will be processed during a lapse in appropriations. Noting payments should be processed within guidelines and according to UG § 200.305 Federal payment.

- **Process invoices** and send reminders to subrecipients/vendors.
- **Continue working on federal awards!** However, recognize the longer the duration of the shutdown, your institution should be prepared to float funds to pay those on awards.
- **Federal personnel WILL NOT** be available. While each agency may articulate emergency contact procedures, as a rule, do not expect federal personnel to be available. They will not be available for scheduled campus visits or project status meetings happening elsewhere.
- **Faculty working in federal labs/facilities and possibly on cooperative agreements and joint awards** may be most immediately affected. They could receive notification that they are not permitted to work on associated awards during the shutdown.
- **Faculty working at a federal agency on an IPA agreement** should immediately contact the agency to determine next steps.
- **Pay attention to awards that already have closed and are up against the 120-day closeout deadline** – final closeout procedures may not be able to be processed.
- **Process No Cost Extensions (NCEs).** Notify Principal Investigators (PIs) with awards set to end during the lapse to see if they intend to submit an NCE. Ideally, submit NCE requests before the shutdown, as any NCE requiring agency approval may not be processed until normal operations resume.
- **Pay attention to programs where the appropriation authority** is scheduled to expire. This would be a “one-off” scenario, though if it does happen, these funds may be lost permanently.
- **For those with hospital affiliations,** reimbursement of Medicare funds should be available, though if possible, check in advance.
- **For federal contracts,** “Stop Work” orders may be implemented, in which case, those employees can no longer be paid with federal funds.
- **Institutional management of cash flow** will be affected. To the extent you are involved in reporting to Senior Management, the Board of Trustees, etc., recognize this will be a challenge.
- **No issuance of new awards.** Agencies will likely not issue new notices, awards, or other actions during the shutdown.
- **NSF postdoc fellows** paid directly by NSF may not receive stipend payments. An institution can use the NSF [Advanced Search function](#) (in “Keyword,” enter the student name, and for “Award Instrument,” select Fellowship) to find any postdoc fellows who may be impacted.
- **Other / Unanticipated 1** (placeholder for other considerations)
- **Other / Unanticipated 2** (placeholder for other considerations)
- **Other / Unanticipated 3** (placeholder for other considerations)
- **Other / Unanticipated 4** (placeholder for other considerations)

## **Resources to Watch**

[Agency Contingency Plans](#)