



## AWARD MODIFICATIONS, TERMINATIONS, AND APPEALS

April 24, 2025

### INTRODUCTION

Research awards to Pitt are now receiving a variety of communications from federal research sponsors about research awards. Some of these are requests to modify the scope or language of the award, in order to align with what the sponsor now chooses to prioritize and fund. And unfortunately, sometimes the correspondence is to terminate the award, and directs that work, and all spending related to the work, to cease.

How to proceed if this happens to your award? The checklist below addresses critical components to be managed, Pitt offices that need to be alerted, and decisions that need to be made.

### WHAT CHANGES ARE BEING REQUESTED/REQUIRED BY FEDERAL SPONSORS

We are seeing three different types of communications coming from federal award sponsors:

- **STOP WORK ORDER:** This type of order requires the research team to cease work on the project, and in particular, to suspend activities that would incur charges on the award and would be paid by the sponsor. This type of order does not formally terminate or cancel the award; it essentially pauses work and spending on the project.
- **TERMINATION ORDER:** This order formally terminates the award from the sponsor and also requires the research team to cease work on the project, and suspend activities that would incur charges on the award.
- **MODIFICATION REQUEST:** This is a request to change something related to the award, e.g., its title, statement of work, notice of award, or other parts of the proposal language, to align it with current sponsor funding priorities. The request usually notes that, to continue funding, compliance with the request is required.

Sometimes the federal award sponsor sends the request/order directly to the Principal Investigator (PI) of the award, or members of its awards team, via an email message. But sometimes, the sponsor communicates the request/order to the Office of Sponsored Programs (OSP) in Pitt Research.

### Checklist Items: First Contact

- ☐ **PI Contacted:** If a PI/project team receives any such communication from a sponsor about their proposal, application, or award, please immediately send the communication to OSP at [OSP@pitt.edu](mailto:OSP@pitt.edu) so that guidance and support can be provided.
- ☐ **OSP Contacted:** If OSP receives this communication, OSP will immediately notify the PI, so that appropriate guidance and support can be provided.

- ☐ **Subaward Status:** If a project is a subaward from another organization (e.g., another university leads the work, but Pitt is a collaborative partner and is funded via a subaward from that other university), it might be that this outside partner receives notification from the sponsor, and they communicate it to the PI or to OSP, directly. Again, make sure that if you receive this notice directly, you inform OSP at [OSP@pitt.edu](mailto:OSP@pitt.edu).
- ☐ **OSP/School Awareness:** Most important: *however* the notice comes to Pitt, make sure that **OSP** is aware of this notice, that your department head or unit lead is aware, that your unit research administrator is aware, and that your Dean is also informed.

## WHAT TO DO: IF YOUR RESEARCH SPONSOR SENDS A STOP WORK OR TERMINATION ORDER

### Initial Steps: First Contact & Awareness

- ☐ **First Contact:** Consult the **First Contact** checklist above. However the notice comes to Pitt, make sure that **OSP**, your department head or unit lead, your unit research administrator, and your Dean, are informed.

### Next Steps: Refer To the Following Checklist

- ☐ **Appeals:** Does the termination include appeal language? If yes, OSP will notify the PI about that option and next steps.
- ☐ **Human Subjects:** Does the project include human subjects? If yes, contact Human Research Protection Office (IRB) at [ORP\\_Support@pitt.edu](mailto:ORP_Support@pitt.edu).
- ☐ **Animal Models:** Does the project include research animals? If yes, contact Animal Research Protection Office (IACUC) at [ORP\\_Support@pitt.edu](mailto:ORP_Support@pitt.edu).
- ☐ **Community Partners:** Does the project include community partners? If yes, contact the Office of Engagement & Community Affairs at [communityinfo@pitt.edu](mailto:communityinfo@pitt.edu).
- ☐ **Award Closure:** Initiate timely close out (for termination) and stop spending on this award (for both stop work and termination), EXCEPT expenses to support subject safety (if applicable). Contact your department, unit or school-level research administration team on how to do this.
- ☐ **Suspend Purchasing:** Notify Purchasing in the Office of Finance and Operations (CFO) immediately at [pptcustomerservice@cfo.pitt.edu](mailto:pptcustomerservice@cfo.pitt.edu) to hold on negotiating or executing any services agreements or pending purchase orders (POs) related to this award.
- ☐ **Subaward Status:** Does the project have any outgoing subawards? If yes:
  - ☐ OSP will notify the PI of any known outgoing subawards. The PI should identify any additional pending or active subawards.
  - ☐ OSP will coordinate communication with the subawards about the termination.

## WHAT TO DO: IF YOUR RESEARCH SPONSOR REQUESTS AN AWARD MODIFICATION

### Initial Steps: First Contact & Awareness

- ☐ **First Contact:** Consult the **First Contact** checklist above. However the notice comes to Pitt, make sure that **OSP**, your department head or unit lead, your unit research administrator, and your Dean, are informed.

### Next Steps: Work With OSP And Your School

- ☐ OSP and your School will connect with you to discuss how to respond to the request for modification, and how to submit that response back to the sponsor.

## WHAT TO DO: IF YOUR AWARD TERMINATION MAY BE APPEALED

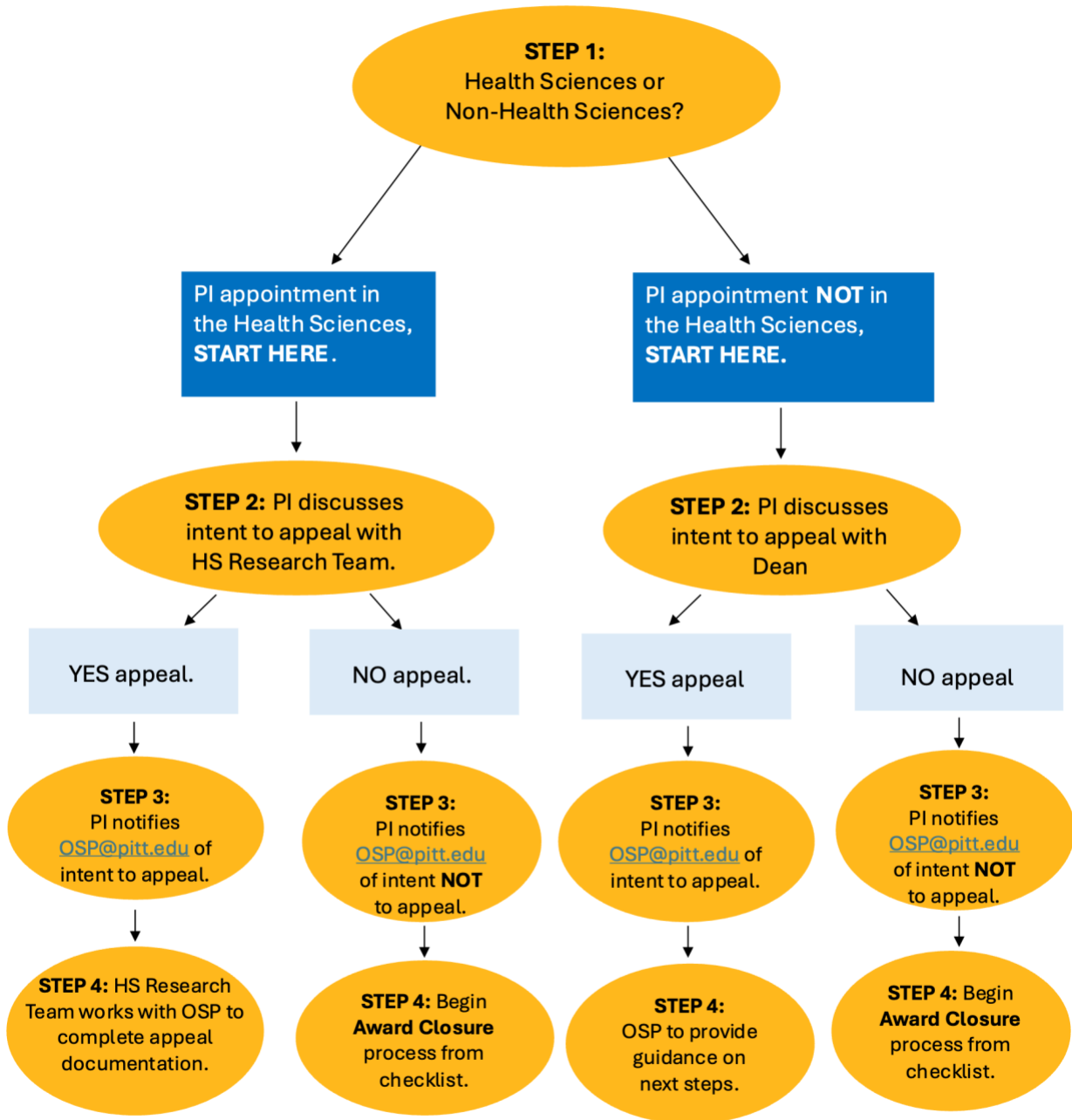
Some award cancellations come with a formal “appeals” mechanism, by which Pitt is permitted to submit an appeal, that explains why the award cancellation should be overturned. There are several important things to know about these appeals:

- Not every award termination offers an appeals path.
- Appeals are not guaranteed, and no review timeline has been identified by any sponsors.
- An appeal requires institutional consultation and approval. Please see Appeal Approval Flowchart on the following page.
- It should be noted that federal grants are awarded to the University of Pittsburgh, and the PI is the steward of the award on behalf of Pitt. Therefore, the University has a responsibility to assess decisions and content provided in an appeal.
- The University has 30 days from the date of notice of termination to complete the appeal submission. Steps and decisions need to happen quickly but with careful consideration.

### Next Steps: Work With OSP And Your School

- ☐ **Appeal Possibility:** OSP will examine the award termination language and determine if the award has an appeal path.
- ☐ **Appeal Proposal:** Would you like to appeal?
  - ☐ If no, please notify OSP of this information by replying to the email from OSP about the termination or at [OSP@pitt.edu](mailto:OSP@pitt.edu).
  - ☐ If yes, please follow the **Appeal Approval Flow Chart** on the following page.

## APPEAL APPROVAL FLOW CHART



## FREQUENTLY ASKED QUESTIONS

- **QUESTION:** Can the PI use alternate funding sources to bridge a terminated award?

**ANSWER:** Maybe.

- Unrestricted discretionary funds may be used, for example gifts.
- Research allocations from RDF funds (via [Pitt Policy RI 06](#)) or other funds sourced from receipt of award indirects, cannot be used.
- University sources of funding derived from the federal government cannot be used/allocated to fund work terminated by the federal government.
- In all cases, consult your School Research Administration and Dean about funding sources that may be available under the circumstances.

- **QUESTION:** Is bridge funding available for terminated awards?

**ANSWER:**

- Not at the institutional level at this time.
- Consult your Dean for the availability of any bridging funds for your award at the school-level, and the required process for submitting any bridging request.