

# Navigating Federal Orders and Guidance

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## Leadership Updates Archive

### Guidance for Research Award Termination Notices

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March 25, 2025

Dear Associate Research Deans:

Like other higher education and research institutes, University of Maryland, Baltimore (UMB) has started to receive Termination Notices for select U.S. Government grants, cooperative agreements, contracts, and pass-through awards.

Unlike Stop Work Orders and Suspension Notices, which are temporary pauses to awards and for which we [issued guidance in February](#), Termination Notices are intended to enact a **permanent status**. The [Code of Federal Regulations definition \(2 CFR 1108.380\)](#) states: “Termination means the ending of an award or subaward, in whole or in part, at any time prior to the planned end of period of performance.”

In the event a Termination Notice is received by a principal investigator (PI), they should take the following actions:

1. **Stop work on all activities and deliverables funded by the terminated award.** For multi-donor projects, this may mean some activities can continue. After the date of termination, expenses incurred for project activities or deliverables funded by the terminated award **are not allowable and will not be reimbursed under most award regulations** unless specific pre-approval has been provided by the Sponsor’s or Pass-through Entity’s authorized Contract or Grant Officer. Approvals from Technical Representatives and other program officers are not binding.
2. Immediately **share the Termination Notice (or equivalent directive) from the Sponsor or pass-through entity, with [Jill Frankenfield \(Sponsored Programs Administration \(SPA\)\)](#) and [Laura Scarantino \(Sponsored Projects Accounting and Compliance \(SPAC\)\)](#), copying the department chair and dean.** They will assist in determining whether the Notice is compliant with regulations applicable to the specific award, and whether the Notice is a full termination or allows for partial continuation or re-scoping. If opportunity for appeal exists, decisions about making an appeal will be made in consultation with SPA, SPAC, and the Office of University Counsel.
3. Promptly engage the School’s finance and grant administrators to **determine, segregate, manage, and document allowable costs of termination.**
4. **Review and follow the applicable regulations in your award agreement pertaining to close out and settlement under Termination**, which may include a Termination Plan, asset disposition procedures, Request for Equitable Adjustment or Termination Settlement Proposal, Institutional Animal Care and Use Committee (IACUC) requirements, and Intellectual Property and Data ownership requirements.

5. **Notify the Institutional Review Board (IRB) by utilizing the Reportable New Information pathway** in CICERO. When UMB is the IRB of Record, select option 9 (Suspension or termination of the research by the sponsor or the investigator). When an external IRB is the IRB of Record, select option 14 (Determination...Suspension or termination at UMB (External IRB studies ONLY)).
6. If the terminated award includes **Animal Subject Research**, immediately notify the IACUC at [atiacuc@umaryland.edu](mailto:atiacuc@umaryland.edu) (for paper protocols) or using the "Contact IACUC Staff" button in CICERO.

Please visit the [Research section of UMB's Navigating Federal Orders and Guidance webpage](#) to find an archive of guidance, FAQs, and links to resources that may provide perspective and additional context. Additionally, the [SPA website](#) will be updated in the coming days to provide guidance on termination compliance procedures.

Please share this email with PIs in your School.

We will continue to provide guidance and share information as it becomes available.

Sincerely,

**Gregory F. Ball, PhD**  
*Vice President for Research*

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