### National Institutes of Health (NIH) - Pre-Award Costs

- **Pre-award costs are allowable for a period starting January 20, 2020, through December 31, 2020.**
- Award recipients should maintain appropriate records and cost documentation to substantiate the charging of any salaries or other costs related to project activities, including cancellation or other fees related to interruption of operations or services.  
- **Salaries and Stipends:** Salary and stipend charges will be allowable consistent with the organization’s policies and payroll and effort verification processes. NIH may request documentation to confirm the requirements of the institutional policy.

#### National Science Foundation (NSF) - Award Expenditure Flexibilities

- **NIH NOTIFICATION REQUIRED:** Institutions must maintain documentation of the effects and length of COVID-19 interruption to grantee operations.
- **Nonstreamlined Noncompeting Application Process (Non-SNAP) Award Flexibilities:**
  - Carry forward unbudgeted balances on active grants for immediate efforts for charges that are allowable and in scope of the award.
  - **Travel:** Nonrefundable costs for cancelled grant-related travel and conference registration fees are allowable if they would have otherwise been allowable. NIH-Supported Conferences may be modified.
  - **Clinical Trials:** Institutions may request administrative supplements to cover unanticipated costs if unobligated balances are not available to rebudget; decisions will be made on a case-by-case basis.
  - **Other Costs:** Other flexibilities regarding allowable costs will be considered on a case-by-case basis.

### Non-SNAP Award Flexibilities

- **Deadline Extensions**
  - Late applications will be considered on a case-by-case basis.
  - Continue to check specific solicitations for updates.
- **Known Deadline Impacts:** NSF Solicitations & Dear Colleague Letters (Non-SNAP) and Grants Management, Impact (Continues to Check Back for Updates). 

### Award Expenditure Flexibilities

- **No Cost Extensions**
  - Any NSF awards are automatically eligible for one-year, grantee-approved no cost extensions; further extensions must be approved by NSF.
  - Details regarding COVID-19 impacts to project schedule outside of one-time award extensions should be incorporated in annual progress report and discussed with the program officer, if applicable.

### Award Expenditure Flexibilities

- **No Cost Extensions (NCE)**
  - Agencies can allow for NCEs for up to 12 months for active awards as of March 31, 2020, and scheduled to expire prior or up to December 31, 2020.
- **Other Reporting Activities**
  - Agencies can allow recipients to submit financial and other reports up to three (3) months beyond the normal due date.
  - Draw downs can continue without submission of reports; however, reports must be submitted at the end of the postponed period.
  - **Nonrefundable costs for cancelled grant-related travel and conference registration fees are allowable if they would have otherwise been allowable.**

### Award Expenditure Flexibilities

- **Prior Approval Requirements**
  - Sponsors may waive prior approval requirements, as outlined in Research Terms and Conditions, to continue to apply and should be leveraged.
  - **Costs Related to Project Activity Interruption or Cancelled Travel:**
    - Award recipients should maintain appropriate records and cost documentation to substantiate the charging of any salaries or other costs related to project activities, including cancellation or other fees related to interruption of operations or services.

### Award Expenditure Flexibilities

- **Deadlines Extensions**
  - Sponsors may provide flexibility with regard to specific announcements as well as unsolicited applications; agencies may list specific guidance on their websites.
  - Noncompetitive continuations, in the immediate term, can be requested via a brief statement from grantees to verify the institution is in a position to resume or restore their project activities and accept a planned continuation award.
- **No Cost Extensions (NCE)**
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  - Late applications must include a cover letter with enough detail about the delay to make a determination as to whether circumstances justify accepting the application late.
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<table>
<thead>
<tr>
<th>AGENCY RESPONSE TO OMB GUIDANCE</th>
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<table>
<thead>
<tr>
<th>FEDERAL AGENCY</th>
<th>Proposal Deadlines</th>
<th>NCEs, Closeouts and Other Reporting</th>
<th>Prior Approval Requirement Waivers</th>
<th>Award Expenditure Flexibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>National Aeronautics and Space Administration (NASA) Response</td>
<td>Deadline Extensions</td>
<td>Telework:</td>
<td>• ROSES: Continue to reference the Research Opportunities in Space and Earth Sciences — 2020 (ROSES — 2020) policy on requests for prior approval and the NASA prior approval matrix.</td>
<td>Other Costs</td>
</tr>
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<td></td>
<td>• SBIR/STTR solicitation deadline extended to March 23, 2020; up to April 3, 2020, in some cases.</td>
<td>• Telework is encouraged where possible.</td>
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<td>• Continue to reference the Research Opportunities in Space and Earth Sciences — 2020 (ROSES — 2020) policy for questions related to allowability and allocability of costs related to COVID-19.</td>
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<td>• Additional extensions will be considered on a case-by-case basis.</td>
<td>• Reporting Activities</td>
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<td>• Continue to check back for amendments or updates.</td>
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<td>• Continue to reference the Research Opportunities in Space and Earth Sciences — 2020 (ROSES — 2020) policy.</td>
<td>• Due date extension requests will be considered on a case-by-case basis.</td>
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<td>Department of Energy (DOE) Response</td>
<td>Deadline Extensions</td>
<td><em>DOE NOTIFICATION REQUIRED</em></td>
<td>Rebudgeting</td>
<td>All Costs</td>
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<td></td>
<td>• Preapplications, letters of intent (LOIs) or full proposals can request an extension of up to 14 days.</td>
<td>Telework:</td>
<td>• Cancellation of travel or change of meeting plans is not considered to be a “change in scope” requiring prior approval.</td>
<td>• Maintain appropriate records and cost documentation to substantiate costs related to project activities, as well as cancellation or other fees related to interruption of operations or services.</td>
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<td>• Continue to check specific funding opportunity announcements (FOAs) for most up-to-date information.</td>
<td>• Telework is encouraged where possible; telework should not keep researchers from meeting deadlines.</td>
<td>• Continue to reference standard terms and conditions regarding prior approval requirements and defined of “changes in scope.”</td>
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<td>Progress Report Due Dates:</td>
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<td>• Progress reports for grants, cooperative agreements and interagency awards may be submitted as soon as practicable; delayed progress reports may cause delays in continuation funding.</td>
<td>• Due date extension requests will be considered on a case-by-case basis.</td>
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<tr>
<td>Department of Defense (DOD) Response</td>
<td>Deadline Extensions</td>
<td>Rebudgeting</td>
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<td></td>
<td>• Program officials are advised to provide flexibility with upcoming deadlines to the extent allowable.</td>
<td>• DOD General Terms and Conditions: Continue to reference the DOD general terms and conditions and associated agency addendums for policy on requests for prior approval and the NASA prior approval matrix.</td>
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<td></td>
<td>• Applicants are advised to contact program officials and grant managers to seek extensions for specific funding opportunities as applicable.</td>
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<td>• Continue to monitor grants.gov for the most up-to-date information.</td>
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<td>Reporting Activities</td>
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<td>• The DOD will allow grantees to delay submission of financial, performance and other reports on currently active award accounts up to three months beyond the normal due date.</td>
<td>• ROSES: Continue to reference the Research Opportunities in Space and Earth Sciences — 2020 (ROSES — 2020) policy as requests for prior approval and the NASA prior approval matrix.</td>
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<td>• For other deliverable due dates related to research awards, please contact DOD grants managers or program managers for guidance.</td>
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<td>United States Medical Research Acquisition Activity (USAMRAA) Response</td>
<td>No Deadline Extensions</td>
<td>Telework:</td>
<td>• ROSES: Continue to reference the Research Opportunities in Space and Earth Sciences — 2020 (ROSES — 2020) policy for questions related to allowability and allocability of costs related to COVID-19.</td>
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<td>• There are currently no plans to modify existing application deadline dates.</td>
<td>• Telework is encouraged where possible; telework should not keep researchers from meeting deadlines.</td>
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<td>• Continue to monitor grants.gov for any potential change(s).</td>
<td>No Cost Extensions</td>
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<td>• Continue to reference standard NCE requirements and procedures.</td>
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<td>• Grants officials have been advised to be flexible in considering requests.</td>
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<td>Rebudgeting</td>
<td>• Grants officials have been advised to be flexible in considering requests.</td>
<td>Salaries</td>
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<td>• Continue to reference standard rebudgeting requirements and procedures (and waived prior approval).</td>
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<td>Salaries</td>
<td>• Salaries and benefits for work performed to meet the project activities (including telework) are allowable, regardless of the location where those duties are performed.</td>
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<td>• Changes to the award should only be made when the work is performed within the policies for allowable remote/telework and/or emergency operations; salary and stipends for research personnel cannot be charged to research awards unless research is being performed or as approved on a case-by-case basis.</td>
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<td>• Allowable work activities include data analysis, preparation of articles and papers based on the research, monitoring subrecipients, care of research animals, direct charged administrative costs, etc.</td>
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<td>Travel</td>
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<td>• Alert your program officer about cancelled or interrupted conference/meeting travel plans; consider alternate arrangements (e.g., holding meetings virtually).</td>
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## COVID-19 Research Operations Update: Other Federal Agency Announcements

<table>
<thead>
<tr>
<th>Agency</th>
<th>Date</th>
<th>Indirect Cost Rate Extensions</th>
<th>Single Audit Flexibility</th>
<th>SAM Registration</th>
<th>Deadline Extensions</th>
<th>Clinical Trial Guidance</th>
<th>Contract/Contractor Performance Impacts</th>
<th>Update for Grantees</th>
<th>Contract/Contractor Performance Impacts</th>
<th>Contract/Contractor Performance Impacts</th>
</tr>
</thead>
<tbody>
<tr>
<td>Office of Management and Budget (OMB)</td>
<td>March 19, 2020</td>
<td>• Awarding agencies may allow grantees to continue to use the currently approved indirect cost rates.</td>
<td>• Awarding agencies should allow grantees to delay the completion and submission of the Single Audit report up to twelve (12) months beyond the normal due date; grantees can still qualify as a “low-risk auditee.”</td>
<td>• Active System for Award Management (SAM) registration at time of application is not required; active SAM registration is required at the time of award. • Registrants with active registrations expiring before May 16, 2020, will be afforded a one-time extension of 60 days.</td>
<td>• Application deadlines extended for Higher Education Challenge Grant Program, Beginning Farmer and Rancher Development Program, Agriculture and Food Research Initiative (AFRI), and AREERA. • Other requests for permission to submit late should continue to follow existing policy by contacting the program contact in the Request for Application.</td>
<td>• Reference released guidance regarding research conduct during the COVID-19 pandemic. • Reference the HHS memorandum on the impact of COVID-19 on contract/contractor performance.</td>
<td>• Reference OJP Grantee Update regarding the impacts of COVID-19 to grantees.</td>
<td>• Reference unclassified notice to all contractors regarding COVID-19.</td>
<td>• Reference FAQs to all contractors regarding COVID-19.</td>
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