

# AGENCY RESPONSE TO OMB GUIDANCE



FEDERAL AGENCY	Proposal Deadlines	NCEs, Closeouts and Other Reporting	Prior Approval Requirement Waivers	Award Expenditure Flexibilities
<p><a href="#">Office of Management and Budget (OMB) Award-Specific Guidelines</a> March 19, 2020</p>	<p><b>Deadline Extensions</b></p> <ul style="list-style-type: none"> <li>Sponsors may provide flexibility with regard to specific announcements as well as unsolicited applications; agencies may list specific guidance on their websites.</li> <li>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.</li> </ul>	<p><b>No Cost Extensions (NCE)</b></p> <ul style="list-style-type: none"> <li>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.</li> </ul> <p><b>Other Reporting Activities</b></p> <ul style="list-style-type: none"> <li>Agencies can allow recipients to submit financial and other reports up to three (3) months beyond the normal due date.</li> <li>Draw downs can continue without submission of reports; however, reports must be submitted at the end of the postponed period.</li> </ul>	<p><b>Prior Approval Requirements</b></p> <ul style="list-style-type: none"> <li>Sponsors may waive requirements as necessary to manage the impacts of COVID-19.</li> <li>Waived prior approval requirements, as outlined in Research Terms and Conditions, continue to apply and should be leveraged.</li> <li>All costs charged to federal awards must be consistent with federal cost policy guidelines and the terms of the award, except where unique allowances by sponsoring agencies are made.</li> </ul>	<p><b>Salaries</b></p> <ul style="list-style-type: none"> <li>Awarding agencies may allow recipients to continue to charge salaries and benefits to currently active federal awards consistent with the recipient organization's policy.</li> </ul> <p><b>Other Costs</b></p> <ul style="list-style-type: none"> <li>Agencies may allow other costs necessary to resume award research activities, consistent with cost principles.</li> <li>Awarding agencies may waive the procurement requirements regarding geographical preferences and contracting small and minority businesses, women's business enterprises, and labor surplus area firms.</li> </ul> <p><b>Costs Related to Project Activity Interruption or Cancelled Travel</b></p> <ul style="list-style-type: none"> <li>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.</li> </ul> <p><b>Pre-Award Costs</b></p> <ul style="list-style-type: none"> <li>Pre-award costs are allowable for a period starting January 20, 2020, through the pandemic and prior to the date of a federal award.</li> </ul>
<p><a href="#">National Institutes of Health (NIH) Response</a> March 12, 2020</p>	<p><b>*Institutions must maintain documentation of the effects and length of COVID-19 interruption to grantee operations.*</b></p> <p><b>Deadline Extensions</b></p> <ul style="list-style-type: none"> <li>Late applications will be considered on a case-by-case basis.</li> <li>Advanced permission to submit late applications is not required.</li> <li>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.</li> <li>Continue to check specific solicitations for updates.</li> </ul>	<p><b>*NIH NOTIFICATION REQUIRED. Institutions must maintain documentation of the effects and length of COVID-19 interruption to grantee operations.*</b></p> <p><b>Closeout</b></p> <ul style="list-style-type: none"> <li>Closeout reporting delays are allowed by notifying the assigned grants management specialist; this delay may not exceed one year.</li> <li>Additional project period extension beyond the first NCE requires prior approval per standard practice.</li> </ul> <p><b>Other Reporting Activities</b></p> <ul style="list-style-type: none"> <li>Late Research Progress Performance Reports (RPPR), financial reports and invention reports will be accepted by notifying the assigned grants management specialist but will delay issuing grant awards until the reports are received and accepted.</li> </ul> <p><b>Clinical Trials</b></p> <ul style="list-style-type: none"> <li>Project periods extensions beyond the seven-year timeframe are allowed.</li> </ul>	<p><b>*NIH NOTIFICATION REQUIRED. Institutions must maintain documentation of the effects and length of COVID-19 interruption to grantee operations.*</b></p> <p><b>Nonstreamlined Noncompeting Application Process (Non-SNAP) Award Flexibilities:</b></p> <ul style="list-style-type: none"> <li>Carry forward unobligated balances on active grants for immediate efforts for charges that are allowable and in scope of the award.</li> <li>An extension of the final budget period is allowed for a one-time period of up to 12 months by notifying the assigned grants management specialist.</li> </ul>	<p><b>*NIH NOTIFICATION REQUIRED. Institutions must maintain documentation of the effects and length of COVID-19 interruption to grantee operations.*</b></p> <p><b>Salaries and Stipends</b></p> <ul style="list-style-type: none"> <li>Salary and stipend charges will be allowable consistent with the organization's policies and payroll and effort verification processes.</li> <li>NIH may request documentation to confirm the requirements of the institutional policy.</li> </ul> <p><b>Travel</b></p> <ul style="list-style-type: none"> <li>Nonrefundable costs for cancelled grant-related travel and conference registration fees are allowable if they would have otherwise been allowable.</li> </ul> <p><b>NIH-Supported Conferences</b></p> <ul style="list-style-type: none"> <li>Nonrefundable costs are allowable and may be requested as an administrative supplement by contacting the assigned grants management specialist.</li> </ul> <p><b>Clinical Trials</b></p> <ul style="list-style-type: none"> <li>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.</li> </ul> <p><b>Other Costs</b></p> <ul style="list-style-type: none"> <li>Other flexibilities regarding allowability of costs will be considered on a case-by-case basis.</li> </ul>
<p><a href="#">National Science Foundation (NSF) Response</a> March 19, 2020</p>	<p><b>Deadline Extensions</b></p> <ul style="list-style-type: none"> <li>Late applications will be considered on a case-by-case basis.</li> <li>Continue to check specific solicitations for updates.</li> <li><a href="#">Known Deadline Impacts: NSF Solicitations &amp; Dear Colleague Letters (DLCs) Deadlines Impacted (continue to check back for updates): NSF 19-594, NSF 19-599, NSF 20-041, NSF 20-518, NSF 20-519, NSF 20-526, NSF 20-530, NSF 20-531, NSF 20-540</a></li> </ul>	<p><b>*NSF NOTIFICATION REQUIRED*</b></p> <p><b>No Cost Extensions</b></p> <ul style="list-style-type: none"> <li>All NSF awards are automatically eligible for one-year, grantee-approved no cost extensions; further extensions must be approved by NSF.</li> <li>Details regarding COVID-19 impacts to project schedule outside of one-time awardee extensions should be incorporated in annual progress report and discussed with the program officer, if applicable.</li> </ul>	<ul style="list-style-type: none"> <li><a href="#">PAPPG: Continue to reference Proposal &amp; Award Policies &amp; Procedures Guide (PAPPG 19-1) policy on requests for prior approval and the NSF prior approval matrix.</a></li> </ul>	<p><b>Travel</b></p> <ul style="list-style-type: none"> <li>Continue to follow all relevant sponsor and institutional policies and procedures and apply those practices consistently.</li> </ul> <p><b>NSF-Supported Conferences</b></p> <ul style="list-style-type: none"> <li>Consider rescheduling the conference and/or repurpose the funds for a future award-related meeting.</li> </ul>

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<p><a href="#">National Aeronautics and Space Administration (NASA) Response</a> March 10, 2020</p>	<p><b>Deadline Extensions</b></p> <ul style="list-style-type: none"> <li>SBIR/STTR solicitation deadline extended to March 23, 2020; up to April 3, 2020, in some cases.</li> <li>Additional extensions will be considered on a case-by-case basis.</li> <li>Continue to reference the Research Opportunities in Space and Earth Sciences – 2020 (ROSES – 2020) policy.</li> </ul>	<p><b>Telework:</b></p> <ul style="list-style-type: none"> <li>Telework is encouraged where possible.</li> </ul> <p><b>Reporting Activities</b></p> <ul style="list-style-type: none"> <li>Due date extension requests will be considered on a case-by-case basis.</li> </ul>	<ul style="list-style-type: none"> <li><a href="#">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</a></li> </ul>	<p><b>Other Costs</b></p> <ul style="list-style-type: none"> <li>Continue to reference the Research Opportunities in Space and Earth Sciences – 2020 (ROSES – 2020) for questions related to allowability and allocability of costs related to COVID-19.</li> <li>Continue to check back for amendments or updates.</li> </ul>
<p><a href="#">Department of Energy (DOE) Response</a> March 13, 2020</p>	<p><b>Deadline Extensions</b></p> <ul style="list-style-type: none"> <li>Preapplications, letters of intent (LOIs) or full proposals <i>can request</i> an extension of up to 14 days.</li> <li>Continue to check specific funding opportunity announcements (FOAs) for most up-to-date information.</li> </ul>	<p><b>*DOE NOTIFICATION REQUIRED*</b></p> <p><b>Telework:</b></p> <ul style="list-style-type: none"> <li>Telework is encouraged where possible; telework should not keep researchers from meeting deadlines.</li> </ul> <p><b>Progress Report Due Dates:</b></p> <ul style="list-style-type: none"> <li>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.</li> </ul>	<p><b>Rebudgeting</b></p> <ul style="list-style-type: none"> <li>Cancellation of travel or change of meeting plans is not considered to be a “change in scope” requiring prior approval.</li> <li>Continue to reference standard terms and conditions regarding prior approval requirements and defined of “changes in scope.”</li> </ul>	<p><b>All Costs</b></p> <ul style="list-style-type: none"> <li>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.</li> </ul>
<p><a href="#">Department of Defense (DOD) Response</a> March 24, 2020</p>	<p><b>Deadline Extensions</b></p> <ul style="list-style-type: none"> <li>Program officials are advised to provide flexibility with upcoming deadlines to the extent allowable.</li> <li>Applicants are advised to contact program officials and grant managers to seek extensions for specific funding opportunities as applicable.</li> <li>Continue to monitor grants.gov for the most up-to-date information.</li> </ul>	<p><b>Reporting Activities</b></p> <ul style="list-style-type: none"> <li>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.</li> <li>For other deliverable due dates related to research awards, please contact DOD grants managers or program managers for guidance.</li> </ul>	<ul style="list-style-type: none"> <li><a href="#">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</a></li> </ul>	<p><b>Salaries</b></p> <ul style="list-style-type: none"> <li>DOD will allow recipients to continue to charge salary and benefits to currently active awards consistent with recipients’ policy of paying salaries (under expected or extraordinary circumstances) from all funding sources, federal and nonfederal.</li> <li>To maximum extent practicable, recipients will be expected to invoke or institute any and all reasonable mitigation practices and actions to lessen the cost to the government during this crisis.</li> </ul> <p><b>Travel</b></p> <ul style="list-style-type: none"> <li>DOD will allow nonrefundable travel expenses incurred for travel cancelled due to COVID-19 to be charged to active awards (aligned with OMB guidance and in concurrence with institutional policy).</li> </ul>
<p><a href="#">United States Medical Research Acquisition Activity (USAMRAA) Response</a> March 16, 2020</p>	<p><b>No Deadline Extensions</b></p> <ul style="list-style-type: none"> <li>There are currently no plans to modify existing application deadline dates.</li> <li>Continue to monitor grants.gov for any potential change(s).</li> </ul>	<p><b>Telework:</b></p> <ul style="list-style-type: none"> <li>Telework is encouraged where possible; telework should not keep researchers from meeting deadlines.</li> </ul> <p><b>No Cost Extensions</b></p> <ul style="list-style-type: none"> <li>Continue to reference standard NCE requirements and procedures.</li> <li>Grants officials have been advised to be flexible in considering requests.</li> </ul>	<p><b>Rebudgeting</b></p> <ul style="list-style-type: none"> <li>Continue to reference standard rebudgeting requirements and procedures (and waived prior approvals).</li> <li>Grants officials have been advised to be flexible in considering requests.</li> </ul>	<p><b>Salaries</b></p> <ul style="list-style-type: none"> <li>Salaries and benefits for work performed to meet the project activities (including telework) are allowable, regardless of the location where those duties are performed.</li> <li>Charges 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.</li> <li>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.</li> </ul> <p><b>Travel</b></p> <ul style="list-style-type: none"> <li>Alert your program officer about cancelled or interrupted conference/meeting travel plans; consider alternate arrangements (e.g., holding meetings virtually).</li> </ul>

COVID-19 Research Operations Update: Other Federal Agency Announcements						
<u>Office of Management and Budget (OMB) Institution Guidelines</u> <u>March 19, 2020</u>	<u>National Institute of Food and Agriculture (USDA)</u> <u>March 18, 2020</u>	<u>Food and Drug Administration (FDA)</u> <u>March 18, 2020</u>	<u>Department of Health and Human Services (DHHS)</u> <u>March 16, 2020</u>	<u>Office of Justice Programs (OJP)</u> <u>March 16, 2020</u>	<u>National Security Agency (NSA)</u> <u>March 9, 2020</u>	<u>Defense Advanced Research Projects Agency (DARPA)</u> <u>March 19, 2020</u>
<p><b>Indirect Cost Rate Extensions</b></p> <ul style="list-style-type: none"> <li>Awarding agencies may allow grantees to continue to use the currently approved indirect cost rates.</li> <li>Agencies may approve grantee requests for an extension on the use of current rates for one year without submission of an indirect cost proposal; may also approve grantee requests for an extension of the indirect cost rate proposal submission to finalize the current rates and establish future rates.</li> </ul> <p><b>Single Audit Flexibility</b></p> <ul style="list-style-type: none"> <li>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; grantee can still qualify as a "low-risk auditee."</li> </ul> <p><b>SAM Registration</b></p> <ul style="list-style-type: none"> <li>Active System for Award Management (SAM) registration at time of application is not required; active SAM registration is required at the time of award.</li> <li>Registrants with active registrations expiring before May 16, 2020, will be afforded a one-time extension of 60 days.</li> </ul>	<p><b>Deadline Extensions</b></p> <ul style="list-style-type: none"> <li>Application deadlines extended for Higher Education Challenge Grant Program, Beginning Farmer and Rancher Development Program, Agriculture and Food Research Initiative (AFRI), and AREERA</li> <li>Other requests for permission to submit late should continue to follow existing policy <i>by contacting the program contact in the Request for Application.</i></li> </ul>	<p><b>Clinical Trial Guidance</b></p> <ul style="list-style-type: none"> <li>Reference released guidance regarding research conduct during the COVID-19 pandemic.</li> </ul>	<p><b>Contract/Contractor Performance Impacts</b></p> <ul style="list-style-type: none"> <li>Reference the HHS memorandum on the impact of COVID-19 on contract/contractor performance.</li> </ul>	<p><b>Update for Grantees</b></p> <ul style="list-style-type: none"> <li>Reference OJP Grantee Update regarding the impacts of COVID-19 to grantees.</li> </ul>	<p><b>Contract/Contractor Performance Impacts</b></p> <ul style="list-style-type: none"> <li>Reference unclassified notice to all contractors regarding COVID-19.</li> </ul>	<p><b>Contract/Contractor Performance Impacts</b></p> <ul style="list-style-type: none"> <li>Reference FAQs to all contractors regarding COVID-19.</li> </ul>