

## Federal Guidance to Grantees and Applicants RE: COVID-19

Updated April 17, 2020

### Agency-Specific Guidance:

NSF: [https://www.nsf.gov/news/special\\_reports/coronavirus/](https://www.nsf.gov/news/special_reports/coronavirus/)

NIH: <https://grants.nih.gov/policy/natural-disasters/coronavirus.htm>

USDA/NIFA: <https://nifa.usda.gov/coronavirus>

NEA: <https://www.arts.gov/COVID-19-FAQs>

Other federal agencies:

<https://www.cogr.edu/sites/default/files/COVID19AgencyGuidanceMatrix%20v7%20April%201%202020%20%28003%29.pdf>

### Salary-Specific Guidance:

1) *May I continue to charge salaries and benefits to grants, even if work cannot be completed due to COVID-19-related disruptions?*

Yes. If an individual paid through a grant cannot contribute to the project due to COVID-19-related disruptions, the salary and benefits *may* currently continue to be charged to the award, although there is no requirement to do so.

This is allowable because the College's [current policy](#) is to allow paid excused absences in this situation. As circumstances unfold, the College will review this among other temporary policies, and communicate changes with the Barnard research community.

Researchers should be advised, however, that Barnard will not be in a position to offer supplemental salary in the event that the delay in research causes a deficit in later years. As circumstances unfold, we will review this among other temporary policies related to COVID-19, and communicate any changes with Barnard's research community.

Please note: [NIH](#) and [NSF](#) have issued explicit guidance regarding salary charges in this situation, but we await further guidance from some sponsors. It is possible that some charges may need to be removed, based upon future sponsor guidance.

PIs must document and retain information on the staff and related compensation that is charged to any award when no contribution is made to the project.

2) *For individuals working remotely, can their effort still be charged to a sponsored project?*

If the individual is working remotely and contributing to a sponsored project, then salary can be charged to that grant. The usual grants management requirements apply.

3) *Does Barnard's current hiring freeze extend to grant-funded positions?*

No. Barnard's current hiring freeze does NOT extend to grant-funded positions, as long as salary AND benefits are charged to the grant.

NSF

“Recipients are authorized to continue to charge salaries, stipends, and benefits to currently active NSF awards consistent with the recipients’ policy of paying salaries (under unexpected or extraordinary circumstances) from all funding sources, Federal and non-Federal. The recipient also is authorized to charge other costs to NSF awards that are necessary to resume activities supported by the award, consistent with applicable Federal cost principles and the benefit to the project.

**Recipients must not assume that supplemental funding will be available should the charging of such costs or other fees result in a shortage of funds to eventually carry out the project. If a shortfall is anticipated, recipients must contact the cognizant NSF Program Officer to discuss the situation.”**

Source: [https://www.nsf.gov/bfa/dias/policy/covid19/covid19\\_nsfombimplementation.pdf](https://www.nsf.gov/bfa/dias/policy/covid19/covid19_nsfombimplementation.pdf)

NIH

“NIH understands that many researchers may be unable to work as a result of or related to the effects of COVID-19. If a recipient organization’s policy allows for the charging of salaries and benefits during periods when no work is performed due to the effect of COVID-19, regardless of the funding source, including Federal and non-Federal, then such charges to NIH grant awards will be allowable.

*Reminder: NIH awarding Institutes/Centers (ICs) may request documentation to confirm the requirements of institutional policies.”*

Source: <https://grants.nih.gov/grants/guide/notice-files/NOT-OD-20-086.html>

### **Application Deadlines:**

NIH

“... [A]ll grant applications submitted late for due dates between March 9, 2020, and May 1, 2020, will be accepted through May 1, 2020. This notice applies to all relevant funding opportunity announcements, including those that indicate no late applications will be accepted. Institutions need not request advance permission to submit late due to this declared emergency and a cover letter providing a justification is not required.”

Source: <https://grants.nih.gov/grants/guide/notice-files/NOT-OD-20-091.html>

NSF

“NSF has extended the deadline dates for specific funding opportunities. A listing of these extensions is available on the Foundation’s COVID-19 webpage. Deadline dates for funding opportunities that do not appear on the list remain unchanged. Recipients who are unable to meet stated deadlines should contact the cognizant NSF Program Officer to discuss the issue. NSF will consider extensions on a case by case basis.”

Source: [https://www.nsf.gov/bfa/dias/policy/covid19/covid19\\_deadlines.pdf](https://www.nsf.gov/bfa/dias/policy/covid19/covid19_deadlines.pdf)

## **Reporting Deadlines:**

NIH

“If your institution is unable to complete and submit financial and Research Progress Performance Reports (RPPR) by the scheduled due date, due to the effects of COVID-19, please be sure to contact the assigned grants management and/or program official to let them know the reports will be late. NIH will accept these late reports but will delay issuing grant awards until the reports are received and accepted by the appropriate Institute or Center (IC).”

Source: <https://grants.nih.gov/grants/guide/notice-files/NOT-OD-20-086.html>

NSF

“NSF... has automatically extended the due date for submission of all annual project reports and final reports due between March 1 and April 30, 2020, by 30 days. These project reports must continue to be submitted via Research.gov. Recipients are reminded that NSF cannot make any new award or supplement any existing award, if the principal investigator (PIs) or any co-PI(s) has an overdue annual project report; therefore, it is vital that annual reports are submitted by the revised due date.”

Source: [https://www.nsf.gov/bfa/dias/policy/covid19/covid19\\_nsfombimplementation.pdf](https://www.nsf.gov/bfa/dias/policy/covid19/covid19_nsfombimplementation.pdf)

## **Non-refundable travel, registration, and/or hotel costs:**

NIH

### **Travel:**

Non-refundable costs associated with grant-related travel that has been cancelled due to COVID-19 may be charged to the NIH award if they would have otherwise been allowable. See [NIH GPS 7.9.1](#) for detailed information on the allowability of travel expenses.

### **Conference Registration Fees:**

Non-refundable registration fees for conferences, symposiums or seminars that have been cancelled due to COVID19 may be charged to the NIH award if they would have otherwise been allowable (e.g. necessary to accomplish program objectives).

Source: <https://grants.nih.gov/grants/guide/notice-files/NOT-OD-20-086.html>

NSF

Recipients who incur costs related to the cancellation of events, travel, or other activities necessary and reasonable for the performance of the award, or the pausing and restarting of grant funded activities due to the public health emergency, are authorized to charge these costs to their award without regard to 2 CFR § 200.403, *Factors affecting allowability of costs*, 2 CFR § 200.404, *Reasonable costs*, and 2 CFR

§ 200.405, *Allocable costs*. Recipients may charge the full cost to the award when the event, travel, or other activities are conducted under the auspices of the grant. Recipients must not assume that supplemental funding will be available should the charging of cancellation or other fees result in a shortage of funds to eventually carry out the event or travel. If a shortfall is anticipated, recipients must contact the cognizant NSF Program Officer to discuss the situation.

Source: [https://www.nsf.gov/bfa/dias/policy/covid19/covid19\\_nsfombimplementation.pdf](https://www.nsf.gov/bfa/dias/policy/covid19/covid19_nsfombimplementation.pdf)