Federal Guidance Related to COVID-19

The information provided below is a condensed version of the guidance and is intended to be a list of the most applicable guidance to Mines’ research. Source material is still the governing document. Faculty and ORA staff should still review source material when evaluating individual project needs and/or questions.

Office of Management and Budget (OMB) Guidance

Date of Information: 3/19/20

Source: OMB M-20-17

Relief for ALL federal awards subject to 2 CFR 200. These exceptions are limited and will be reassessed by OMB within 90 days of memo

1. Flexibility with application deadlines: Agencies may be flexible with competitive and noncompetitive applications. Updates are required to be posted to agency websites
2. No-Cost Extensions: Agencies may extend awards active between 3/21/2020 and 12/31/2020 automatically at no-cost for a period up to 12 months.
3. Salaries on federal awards: Agencies may allow recipients to continue to charge salaries and benefits to active awards consistent with:
   a. Mines’ policy of paying salaries under unexpected or extraordinary circumstances across all funding sources
   b. Salaries must be consistent with federal cost principles and the benefit to the project and documented within appropriate records
4. Allowability of Costs not Normally Chargeable to Awards: Agencies may allow recipients who incur, and charge, costs related to the cancellation of events, travel, or other activities necessary for the performance of the award or the pausing and restarting of the program. Recipients should not assume that additional funds to carry out the program will be provided. Agencies must list specific guidance on their websites.
5. Extension of financial, performance and other reporting: Agencies may allow recipients to delay submission of financial or other reports up to 3 months beyond the normal due date. If agency allows a delay; Mines can continue to draw down federal funds. Awarding agencies may waive the requirement to notify agency of problems, delays, or adverse conditions related to COVID-19 on a grant by grant basis.
6. Extension of Closeout: Agencies may allow a delay in the submission of closeout reports (financial and technical) provided notice is given by Mines to the agency. Delay cannot exceed 1 year

Date of Information: 3/18/20

Source: COGR, AAU, APLU, AAMC Request to OMB
1. Request to OMB to expand M-20-11 to ALL federal grants subject to Uniform Guidance

2. Request to OMB to clarify the notification requirement that requires federal notification as soon as possible when project experiences “delays, or adverse conditions which will materially impact the ability to meet objects...” Request specifically asks that notification occur with 90 days.

Date of Guidance: 3/9/20

Source: OMB M-20-11

Applicable to federal awards issued to support research necessary to carry out the emergency response related to COVID-19 ONLY

2. Pre-Award Costs: Agencies may allow pre-award costs incurred between 1/20/2020 to the effective date of the federal award (i.e. through the Public Health Emergency Period).

3. No-Cost Extensions: Agencies may extend awards active between 3/21/2020 and 12/31/2020 automatically at no-cost for a period up to 12 months.

4. Salaries on federal awards: Agencies may allow recipients to continue to charge salaries and benefits to active awards consistent with:
   a. Mines’ policy of paying salaries under unexpected or extraordinary circumstances across all funding sources
   b. Salaries must be consistent with federal cost principles and the benefit to the project

5. Prior approval requirements: Agencies are authorized to waive prior approval requirements as necessary. Costs must still be consistent with federal rules.

6. Extension of financial and other reporting: Agencies may allow recipients to delay submission of financial or other reports up to 3 months beyond the normal due date.
   a. If agency allows a delay; Mines can continue to draw down federal fund

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National Science Foundation Guidance

Date of Guidance: 3/17/20

Source: Impact on Existing Deadline Dates

1. Proposal for SemiSynBio-II, SWQU, S-STEM, ATD and MoDL all extended – see link for chart

Date of Guidance: 3/16/20

Source: FAQ About the Coronavirus Disease 2019 (COVID-19) For National Science Foundation (NSF) Proposers and Awardees

1. No-Cost Extension: All NSF grants are eligible for a 12 month grantee approved NCE.
2. Travel: More guidance to come; until then follow institutional policy and apply practices consistently
3. Proposal Deadlines: If unable to meet deadline due to COVID-19; contact NSF program officer to discuss issue. NSF may consider an extension on a case by case basis.
4. REU Costs: Still TBD

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**DOE Specific Guidance**

Date of Guidance: 3/13/20

Source: DOE Office of Science Memo: Accommodating Interruptions from Coronavirus Disease 2019 (COVID-19)

DOE Office of Science

1. Proposal Deadlines: FOA deadline changes will be updated on the regular FOA websites. Applicants can request a 14 day extension from the Program Manager, if necessary
2. Progress Reports: Submit reports as soon as practicable via PAMs. Delays could cause future funding delays.
3. Revised budgets & Abstracts: Submit reports as soon as practicable via PAMs. Delays could cause future funding delays.
4. Travel: If institutional policy permits travelers to purchase nonrefundable items (airfare, lodging, etc.) and does not require travelers to reimburse the institution for change or cancellation fees, such fees may be charged to an award. If Mines policy prohibits the purchase of nonrefundable travel, than fees are unallowable.
   a. Priority should be on costs incurred by students and postdocs, not by their depts

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**NIH Specific Guidance**

Date of Guidance: 3/12/20

Source: NOT-OD-20-086

1. Pre-Award Costs: allowed from 1/20/20 to date of federal award for grants affected by COVID-19
2. No-Cost Extensions: Non-SNAP grants may extend the PoP of an active grant for up to 12 months without requesting prior approval by notifying the grants management specialist
3. Salaries: 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.
4. Student Fellowships: Mines may continue to provide stipend payments to fellows and trainees who may be unable to work as a result of or related to COVID-19. Need to notify grants official.
5. Travel: Non-refundable costs associated with grant-related travel, including conference registration fees, that has been cancelled due to COVID-19 may be charged to the NIH award if they would have otherwise been allowable.

6. Closeout: NIH will allow recipients that are affected by COVID-19 to delay submission of any final financial, performance, and other reports for up to one year. Proper notice to NIH is required.

Date of Guidance: 3/10/20

Source: NOT-OD-20-083

1. Late Reports; NIH will accept late reports if caused by COVID-19 issues but the grant office and program official need to be promptly contacted/notified.

Date of Guidance: 3/9/20

Source: NOT-OD-20-082

1. Late Applications will be accepted on a case by case basis in following circumstances:
   a. Applicant or recipient organization is officially closed or unable to submit grant applications due to the effects of COVID-19.
   b. Institutions must submit applications or reports as soon as possible after reopening or resuming operations so that grant applications can be submitted, not to exceed the number of days the institution was officially closed or unable to submit grant applications.
   c. Institutions must submit a cover letter with the applications with enough detail about the delay so that NIH staff can make a determination whether circumstances justify accepting the application late.
   d. Institutions need not request advance permission to submit late due to this declared emergency.

USDA Guidance

Date of Guidance: 3/17/20

Source: NIFA Deadline Extensions Due to COVID-19

1. Proposal Deadlines for AFRI, AREERA have been extended – see link for chart.