**Sponsored Project Guidance**

Agency Guidance and Frequently Asked Questions Relating to Research Awards

The University continues to closely monitor the COVID-19 (novel coronavirus) outbreak. The University maintains a [website](https://www1.ucdenver.edu/coronavirus/updates/cu-denver-coronavirus-and-travel-policies-update-march-9-2020) to provide students, faculty, and staff with updates about the virus and the impact to University operations.

This page is designed to provide timely information regarding the impact to sponsored projects at the University.

If you have a question that is not addressed on this page, please email FS-Compliance@ucdenver.edu.

The Office of Grants and Contracts (OGC) will utilize the email listserv to provide any time-sensitive information. To sign up for the listserv, please visit the [**GC-UPDATES listserv page**](https://lists.ucdenver.edu/scripts/wa.exe?A0=gc-updates)**.**

Recent updates are highlighted in yellow.

**Federal Agency Guidance**

Few federal awarding agencies have provided guidance on the impact to federal awards. This page will be updated as federal agencies release additional information.

We expect federal agencies will recognize the difficulties inherent in this situation and work with institutions to facilitate the conduct of the project. As a reminder, recipients are required to:

* Inform their program officer and grants officer if the need arises for additional Federal funds to complete the project (200.308.(c)(1)(viii));
* Inform federal agency notification is required as soon as “problems, delays, or adverse conditions which will materially impact the ability to meet the objective of the Federal award”(200.328.(d)(1)) is known. The notification must include a statement of the action taken or contemplated and any assistance needed to resolve the situation. It is possible that there will not be an answer yet on what is needed to resolve the situation; in that case, recipients should simply indicate that they will report back when more is known. If you find yourself in this situation, please contact your OGC Post Award Administrator.

Office of Management and Budget (Updated 3/25/2020)

* [M-20-11 Administrative Relief for Recipients and Applicants for Federal Financial Assistance Directly Impacted by the Novel Coronavirus (COVID-19)](https://www.cogr.edu/sites/default/files/M-20-11.pdf)
* [M-20-17 Administrative Relief for Recipients and Applicants of Federal Financial Assistance Directly Impacted by the Novel Coronavirus (COVID-19) due to Loss of Operations](https://www.whitehouse.gov/wp-content/uploads/2020/03/M-20-17.pdf)
* [M-20-18 Managing Federal Contract Performance Issues Associated with the Novel Coronavirus (COVID-19)](https://www.whitehouse.gov/wp-content/uploads/2020/03/M-20-18.pdf)

The Office of Management and Budget (OMB) has released multiple memos identifying flexibilities federal awarding agencies may provide to their grant recipients and contractors. These flexibilities are **NOT** automatically provided to awards. Each federal awarding agency must officially adopt the flexibilities before they become applicable to grants and contracts.

National Institutes of Health (Updated 4/3/2020)

The NIH has released a [webpage](https://grants.nih.gov/grants/natural_disasters/corona-virus.htm) detailing policies and guidance for grants management during the COVID-19 outbreak. NIH has also released a [video](https://www.youtube.com/watch?v=jLmBi5wvifk&feature=youtu.be) explaining the general flexibilities provided to their awards.

Current guidance includes:

* UPDATED [NIH LATE APPLICATION POLICY Due to Public Health Emergency for United States for 2019 Novel Coronavirus (COVID-19)](https://grants.nih.gov/grants/guide/notice-files/NOT-OD-20-091.html) (NOT-OD-20-091)
* [NIH Guidance on Travel and Meetings](https://www.nih.gov/health-information/nih-guidance-travel-meetings)
* [General Frequently Asked Questions (FAQs) – Proposal Submission and Award Management Related to COVID-19](https://grants.nih.gov/grants/guide/notice-files/NOT-OD-20-083.html) (NOT-20-083)
* [Flexibilities Available to Applicants and Recipients of Federal Financial Assistance Affected by COVID-19 (NOT-OD-20-086)](https://grants.nih.gov/grants/guide/notice-files/NOT-OD-20-086.html)
* [Guidance for NIH-funded Clinical Trials and Human Subjects Studies Affected by COVID-19 (NOT-OD-20-087)](https://grants.nih.gov/grants/guide/notice-files/NOT-OD-20-087.html)
* [FAQs on COVID-19 Flexibilities for Applicants and Recipients](https://grants.nih.gov/faqs#/covid-19.htm?anchor=question55752)
* NIH Contracts – NIH is handling contracts on a case by case basis. You need to contact your contracting officer.

Under [revised guidance](https://grants.nih.gov/grants/guide/notice-files/NOT-OD-20-091.html) released on March 26, NIH is allowing all grant applications submitted late for due dates between March 9, 2020 and May 1, 2020 be accepted through May 1, 2020. Recipients do not need to request advance permission to submit a proposal late.

The NIH Guidance on Travel and Meetings encourages individuals to take adequate precautions to protect their health and safety. The guidance also encourages reconsideration of in-person conferences or large meetings that are not mission critical.

The General Frequently Asked Questions (FAQs) – Proposal Submission and Award Management Related to COVID-19 provides general guidance to NIH recipients.

On March 12, 2020, NIH released updated guidance under NOT-OD-20-086, Flexibilities to Applicants and Recipients of Federal Financial Assistance Affected by COVID-19. This guidance provides:

* Pre-award costs to be incurred from January 20, 2020 through the public health emergency period and prior to the date of a federal award for all applicants and recipients that have been affected by COVID-19;
* For awards that are **not** under the Streamlined Non-competing Application Process (SNAP), NIH is waiving prior approval requirements to carry forward unobligated balances, provided all costs are allowable and are within the scope of the original award;
* For awards that are **not** under the Streamlined Non-competing Application Process (SNAP), NIH is waiving prior approval requirements for a no cost extension for a period of up to 12 months. Recipients must notify the NIH grants management specialist to request a no cost extension;
* Charging salaries and benefits when no work is performed due to the effect of COVID-19. The University’s policy is that salaries and benefits will be charged to all funding sources as allocated via the HCM system before the COVID-19 disruption.
* Stipends may continue to be made to fellows and trainees who may be unable to work. Recipients should notify the assigned NIH grants management official and provide documentation demonstrating the effect of COVID-19.
* For charging non-refundable travel, meetings, conferences, and workshops if the travel was cancelled due to COVID-19 and those costs would have otherwise been allowable.

On March 16, 2020, NIH released guidance for NIH-funded clinical trials affected by COVID-19. NIH recommends that recipients consult with their IRB and institutions about potential measures to protect participants and research staff. NIH is also providing a no cost extension for up to 12 months. Recipients should contact their NIH grants management official to discuss the need for a no-cost extension. Additionally, NIH is allowing for unanticipated costs be charged to the award, including:

* Costs incurred to arrange for participants to receive care at their local sites or virtually, rather than the study site, for required visits.
* Supply chain disruptions
* Personnel disruptions due to illness or closure of facilities
* Additional lab testing (e.g. for COVID-19)
* Increased transportation costs

The NIH maintains a [YouTube](https://www.youtube.com/channel/UC1ZUJIWDf-3ItBo8301YF-A) channel that is being updated with videos from the NIH Deputy Director discussing how grant recipients should manage their awards during this emergency.

NIH has stated that:

As this Public Health Emergency continues, recipients may identify additional cost-related flexibilities that are needed. **NIH will consider such requests on a case-by-case basis. Contact your assigned grants management specialist and program official to provide a detailed justification outlining the effect of COVID-19 and the flexibility required.** NIH will consider such requests in line with the Federal cost principles, NIH policy, and need to support the project.

National Science Foundation (Updated 4/3/2020)

* [Frequently Asked Questions (FAQs) About the Coronavirus Disease 2019 (COVID-19) for National Science Foundation (NSF) Proposers and Awardees](https://www.nsf.gov/pubs/2020/nsf20053/nsf20053.jsp?WT.mc_id=USNSF_80)
* [NSF Implementation of OMB Memorandum M-20-17 (Revised April 1)](https://www.nsf.gov/bfa/dias/policy/covid19/covid19_nsfombimplementation.pdf)

On March 23, NSF issued guidance to implement OMB’s flexibilities. NSF is:

* Providing extensions for specific funding opportunities
* Allowing recipients to charge salaries, stipends, and benefits to currently active NSF awards consistent with the recipient’s policy of paying salaries and costs that are necessary to resume the project
* Allowing costs related to canceled events and travel to be charged to the applicable award
* Waiving prior approval requirements except those under [2 CFR 200.308(c)](https://www.ecfr.gov/cgi-bin/text-idx?SID=10f34cdb5df1422174358acaaea3bfad&node=se2.1.200_1308&rgn=div8)
* Automatically extending the date for all annual project reports due between March 1 and April 30, 2020 by 30 days

Other Federal Awarding Agencies (Updated 4/3/20)

* Department of Agriculture
	+ [National Institute of Food and Agriculture – Deadline extension](https://nifa.usda.gov/announcement/nifa-deadline-extensions-due-covid-19)
* Department of Defense
	+ [Air Force – No cost extension guidance for grants](https://www.cogr.edu/sites/default/files/Memo%20to%20Grantees%20COVID-19%20NCE%20%2026%20MAR%2020.pdf)
	+ [Air Force – Memo to contractors](https://hub.jhu.edu/assets/uploads/sites/2/2020/03/Contractor-COVID-19-Memorandum.pdf)
	+ [DARPA – FAQs for DARPA Performers](https://www.darpa.mil/news-events/2020-03-19)
	+ [FAQs for DOD Research Proposers and Awardees](https://basicresearch.defense.gov/COVID-19/Frequently-Asked-Questions/)
	+ [Office of Naval Research – FAQs](https://www.onr.navy.mil/-/media/Files/Contracts-Grants/docs/ONR-FAQs-to-Current-and-Prospective-Grant-Recipients-Impacted-by-COVID-19-27-MAR-20.ashx?la=en&hash=4BB8FD1CD571268C27E598EBF84E29759694AB7F)
	+ [United States Army Medical Research Acquisition Activity – Guidance for grants and cooperative agreements](https://www.usamraa.army.mil/Shared%20Documents/USAMRAA%20Supplemental%20Guidance%20on%20COVID-19_03.25.20%20for%20pdf.pdf)
* Department of Energy
	+ [Accommodating Interruptions from Coronavirus Disease 2019](https://www.cogr.edu/sites/default/files/DOE%20SC%20Accommodating%20Interruptions%20to%20Applicants-Awardees%20due%20to%20COVID-19%20%28002%29.pdf)
* Department of Health and Human Services
	+ ACF – [ACF Grant Flexibilities](https://mcusercontent.com/73f6536c1dbb76229a5ade354/files/1f32de35-cae0-4d03-ae87-bb5938206c23/IM_ACF_OA_2020_01_ACF_COVID_Flexibilities_FINAL_March_30_2020_002_signed_002_.pdf)
	+ CDC – [Information for CDC Applicants and Recipients of CDC Funding](https://www.cdc.gov/grants/public-health-emergencies/covid-19/index.html)
	+ CDC – [Flexibilities Available to Applicants and Recipients](https://www.cdc.gov/grants/public-health-emergencies/covid-19/flexibilities-available-applicants-recipients/index.html)
	+ CDC – [General Funding and Grants FAQs](https://www.cdc.gov/grants/public-health-emergencies/covid-19/faqs/index.html)
	+ [Contracts – Guidance for HHS contractors](https://www.cogr.edu/sites/default/files/Memorandum%20COVID-19%203-14-20211.pdf)
	+ [Food and Drug Administration (FDA) – Conduct of clinical trials](https://www.fda.gov/regulatory-information/search-fda-guidance-documents/fda-guidance-conduct-clinical-trials-medical-products-during-covid-19-pandemic)
	+ [HRSA – COVID-19 FAQs](https://www.hrsa.gov/grants/manage-your-grant/COVID-19-frequently-asked-questions)
	+ [SAMHSA Guidance](https://www.samhsa.gov/coronavirus/discretionary-grant-recipients)
	+ [SAMHSA FAQs](https://www.samhsa.gov/sites/default/files/covid-19-faqs-samhsa-discretionary-grant-recipients.pdf)
* Department of Justice
	+ OJP – [Guidance to Award Recipients](https://www.cogr.edu/sites/default/files/OJP_Guidance_on_Short_Term_Administrative_Relief_March_2020.pdf)
* Institute of Museum and Library Services (IMLS)
	+ [Coronavirus (COVID-19) Updates](https://www.imls.gov/coronavirus-covid-19-updates)
* NASA
	+ [COVID-19 Impact to NASA SBIR/STTR Program](https://sbir.nasa.gov/content/covid-19-impact-nasa-sbirsttr-program)
	+ [Memo to Contractors](https://www.cogr.edu/sites/default/files/NASA%20Global%20Contractor%20Community%20Memo%203-24-2020.pdf)
* National Endowment for the Arts (NEA)
	+ [FAQs and Information for Applicants and Grantees](https://www.arts.gov/COVID-19-FAQs)
* National Security Agency
	+ [Notice to Contractors Regarding COVID-19 Update](https://www.cogr.edu/sites/default/files/%28U%29%20Notice%20to%20Contractors%20Regarding%20COVID-19%20%28Novel%20Coronavirus%29%20Update%20_%20Re-Release%20with%20Downgraded%20Classification.pdf)
* United States Agency for International Development (USAID)
	+ [Guidance](https://www.usaid.gov/sites/default/files/documents/1868/Memorandum_authorizing_COVID_19_flexibilities.pdf)

If you manage a federal grant or contract for an agency not listed, you should refer your questions to the Grants Management Official on your award notice.

Non-Federal Sponsors (Updated 4/3/20)

* [American Heart Association](https://professional.heart.org/professional/ResearchPrograms/UCM_316889_Research.jsp)
* Buelle Foundation – Extension up to three months (email on 4/2/20)
* [PCORI](https://www.pcori.org/COVID-19-Updates)

**Frequently Asked Questions for Sponsored Project Administration**

Travel

1. How does COVID-19 affect the University’s travel policy?

The University published its most recent [travel policy update](https://www1.ucdenver.edu/coronavirus/updates/cu-denver-coronavirus-and-travel-policies-update-march-9-2020) on March 9, 2020. Effective immediately, all university-related international travel that is considered “nonessential” is stopped, regardless of the funding source. Essential travel requires approval by the administrative unit, dean, and the provost or applicable Vice Chancellor. Domestic travel requires the approval by the administrative unit, and dean or applicable Vice Chancellor. If you have previously received approval and scheduled travel, you will still need to receive updated approval as stated above. Unit heads or schools may impose more stringent travel restrictions.

1. I was planning grant-related travel, but the conference was cancelled due to precautions regarding COVID-19. May I still charge the travel-related costs to the grant?

For non-NIH awards:

To date, there is no federal guidance relating to charges to awards for non-refundable travel, conferences, and related expenses due to COVID-19. Costs charged to a federal award must adhere to the applicable cost principles, which require costs to be allowable, allocable, and necessary for an award. Charging cancellation costs to a federal award does not benefit the project; and, therefore, cannot be charged to a federal award without further guidance from the federal agency. For non-federal awards, be sure to follow the sponsor’s policy.

For NIH Awards:

NIH ([NOT-OD-20-086](https://grants.nih.gov/grants/guide/notice-files/NOT-OD-20-086.html)) is allowing non-refundable travel to be charged to the applicable award, provided the travel would have been allowable.

1. What guidance does the Procurement Service Center (PSC) provide regarding travel?

The PSC’s [Procedural Statement](https://www.cu.edu/psc-procedural-statement-travel) on travel outlines the University’s travel policies and procedures. Important considerations for travel include:

* Christopherson Business Travel does not cover trip cancellations. Currently, it appears the standard trip insurance will not cover the cancellations due to COVID-19.
* If cancellations are made by the airline, the airline will typically reimburse the airfare cost or allow the full value of the ticket to be used for future travel. Refunds would be applied to the speedtype that was used for the purchase.
* If the traveler initiates cancellation of the airfare, the value of the ticket (minus the change fee) will be available for future use. If the unused ticket is used for another individual, additional change fees may be applied. **The recommendation is to wait as long as possible to cancel your airline ticket, as airlines may initiate cancellation and either refund the ticket or allow full value for future purchases.**
* Hotels will typically allow for cancellation with no charge anywhere between 24 and 72 hours prior to the date/time of check-in. Please refer to the hotel’s policy.
* If a conference has been cancelled, the conference may reimburse registration and conference hotel bookings. Airfare is typically not reimbursed by the conference and is the responsibility of the traveler to cancel.
* Refunds and change fees are airline-specific, and airlines are continually changing their policies. Please refer to the airline’s most recent policy for guidance.
1. I need to purchase travel soon. What should I do?

The University has restricted all non-essential travel. Do not book any travel that is not essential to the project. For essential travel, do not purchase refundable fares unless the cost increase is less than $200; this is the typical cancelation fee. Please be advised that a number of airlines, including United, are waiving cancelation fees for travel through April 30, 2020. The full value of the ticket can then be used for any travel occurring within one year of the date of purchase. Please refer to, and carefully review, each airline’s most recent policy before purchasing a ticket. Please work with your Department grant administrator and Office of Grants and Contracts to ensure costs are allocated appropriately.

1. I have a conference or travel award, but the conference has been canceled. What should I do?

You should contact the program officer as soon as possible to obtain guidance meeting the terms and conditions of your award.

1. Who should I contact if I do not know what to do?

Due to the nature of this situation, guidance is continually changing. Please reach out to your Post Award Specialist in the Office of Grants and Contracts (OGC) for any assistance. If you have contacted your award’s program officer at a federal agency, please ensure all communication is adequately documented and retained.

Personnel

1. Can an employee in self-isolation still charge time and effort to an award?

In general, yes, provided the employee remains engaged with the project work. Current prior approval requirements regarding disengagement and effort reductions remain in effect. For additional information, please review [2 CFR 200.308(c)(iii)](https://www.ecfr.gov/cgi-bin/text-idx?SID=d6c0d10d63b1f9ec82d8daebe858444c&mc=true&node=se2.1.200_1308&rgn=div8).

1. Can an employee’s sick leave be charged to an award?

Yes. Pursuant to the campus’ indirect cost rate agreement with the federal government, sick leave and other paid absences that are permitted under University policy may be charged to the grant. Employees using sick leave must follow University policy.

1. Can charges related to telework, such as a laptop, be charged to an award if I am required to work from home?

Costs related to telework are generally considered indirect costs and may not be charged directly to a federal award unless specifically approved by the sponsor. You should discuss your telework needs with your manager.

Sub-recipients

1. One of my sub-recipients is at an organization that is closed. What impact will this have on my research?

Most federal research awards provide for a one-time no-cost extension (NCE) up to twelve months. This would be an acceptable programmatic justification for an NCE. Prior approval is required for any additional NCEs. Please contact your OGC Post Award Specialists if you have concerns about sub-recipient performance. Current prior approval requirements regarding disengagement and effort reductions remain in effect. For additional information, please review [2 CFR 200.308(c)(iii)](https://www.ecfr.gov/cgi-bin/text-idx?SID=d6c0d10d63b1f9ec82d8daebe858444c&mc=true&node=se2.1.200_1308&rgn=div8).

Proposal Deadlines

1. Will federal agencies provide an extension to proposal deadlines?

For non-NIH proposals:

For now, you should plan on meeting all sponsor deadlines. If you have a specific situation, you may want to contact the program officer identified on the funding opportunity announcement.

For NIH proposals:

Per [NOT-0D-20-082](https://grants.nih.gov/grants/guide/notice-files/NOT-OD-20-082.html?utm_source=dlvr.it&utm_medium=twitter), NIH will consider accepting applications late on a case-by-case-basis under the following circumstances:

* 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.
* 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.
* Institutions need not request advance permission to submit late due to this declared emergency.

NIH stated that additional guidance will be issued.

Non-Federal Awards

1. I have an award from a non-federal sponsor (industry, association, state government, etc.). What should I do?

Each non-federal sponsor maintains its own policy and guidance. You should contact the sponsor directly for guidance. You are also encouraged to relay any information received from the non-federal sponsor to your OGC Post Award Specialist.