**COVID-19 (Novel Coronavirus)**

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 TK Keith at THOMAS.KEITHIII@CUANSCHUTZ.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)**.**

**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.

Office of Management and Budget (Updated 3/11/2020)

* [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)

The Office of Management and Budget (OMB) released M-20-11, which enables federal awarding agencies to provide greater flexibility to recipients managing projects related to COVID-19 research. As of this time, these flexibilities **do not extend to other awards.**

National Science Foundation (Updated 3/9/2020)

* [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)

The NSF guidance provides answers related to NSF proposals and existing NSF Awards and about participation in NSF merit review panels. The NSF guidance does not alter existing policies for NSF proposals or awards. The guidance emphasizes the need for PIs to work closely with program officers at NSF if their research may be impacted by the outbreak.

The guidance states:

NSF is currently working internally as well as with our federal partners on a number of proposal and award-related issues pertaining to COVID-19. NSF will communicate with the community about these issues and will provide guidance as further information becomes available. **In the meantime, please continue to follow all relevant policies and procedures, including those of your organization, and apply those practices consistently**.

National Institutes of Health (Updated 3/11/2020)

The only guidance available to date --

* [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-20-082.html?utm_source=dlvr.it&utm_medium=twitter)
* [NIH Guidance on Travel and Meetings](https://www.nih.gov/health-information/nih-guidance-travel-meetings)
* [NIH Extramural Response to Natural Disasters and Other Emergencies](https://grants.nih.gov/grants/natural_disasters.htm)
* [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)

Important to note: he NIH guidance on late applications does not currently pertain to the University of Colorado Denver | Anschutz Medical Campus. The late application policy is applicable only to applicants or recipient organizations that are officially closed or unable to submit grant applications.

 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 NIH Extramural Response to Natural Disasters and Other Emergencies guidance identifies NIH procedures during emergencies, and currently only provides the Late Application Policy.

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

* NIH is encouraging all recipients that may have delayed financial, progress, or invention reports to promptly contact the NIH official. NIH will accept these late reports; however, grant awards will be delayed until NIH receives and accepts them.
* As of now, nonrefundable travel may not be charged to an award. NIH will provide further guidance as it becomes available.
* NIH does not directly address if travel and accommodations will be reimbursed. For now, University personal should follow the cost principles under section 7 of the [NIH Grants Policy Statement](https://grants.nih.gov/grants/policy/nihgps/nihgps.pdf).

**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 travel – international and domestic – 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. If you have previously received approval and scheduled travel, you will still need to receive updated approval by your unit, dean, and the provost or applicable Vice Chancellor. Unit heads 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?

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.

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. Departmental approval is required before trip insurance can be purchased.
* 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 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. 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.

Subrecipients

1. One of my subrecipients 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 subrecipient 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?

Current NIH guidance for COVID-19 only applies to organizations that are closed due to the outbreak. 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.

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.

**What is NIH’s guidance on costs at this time?**

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

**Pre-Award Costs:**

NIH is allowing 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.

**Salaries:**

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.**

**University’s Comments:  The University’s policy is that salaries & benefits will be charged to all funding sources as allocated via the HCM system before the COVID-19 disruption.  This means we are complying with NIH’s requirements and therefore, salaries/benefits can be charged to NIH grants for this period of time that involves periods of decreased research activity.**

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

**Stipends:**

Institutions affected by COVID-19 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. Recipients should notify the assigned grants management official, and provide documentation demonstrating the effect of COVID-19, and how long the institution will be affected.

**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](https://grants.nih.gov/grants/policy/nihgps/HTML5/section_7/7.9_allowability_of_costs_activities.htm#Selected) 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).

**What is NIH’s guidance on Financial, RPPR and other reports?**

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

**Extension of Post-Award Financial and Other Reporting:**

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).

**What is NIH’s guidance on Prior Approval Requirement Waivers?**

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

As a reminder, recipients have rebudgeting authority available under NIH Grants Policy Statement [Sec. 8.1.1.2](https://grants.nih.gov/grants/policy/nihgps/HTML5/section_8/8.1_changes_in_project_and_budget.htm?tocpath=8%20Administrative%20Requirements%7C8.1%20Changes%20in%20Project%20and%20Budget%7C8.1.1%20NIH%20Standard%20Terms%20of%20Award%7C_____2#8.1.1.2_Cost-Related_Prior_Approvals):, which states, “NIH prior approval is not required to rebudget funds for any direct cost item that the applicable cost principles identify as requiring the Federal awarding agency's prior approval, unless the incurrence of costs is associated with or is considered to be a change in scope.”

Recipients that are not under Streamlined Non-competing Application Process (SNAP) have the discretion to carry forward unobligated balances on their active grants for immediate efforts to support activities related to or affected by COVID-19 as long as the charges are allowable costs and are within the scope of the original award.

In addition, affected recipients that have active non-SNAP grant projects may extend the final budget period of the approved project period on active grants one time for a period of up to 12 months without requesting prior approval, by notifying the assigned grants management specialist.

**What is NIH’s guidance on Extension of Closeout?**

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

NIH will allow recipients that are affected by COVID-19 to delay submission of any final financial, performance, and other reports required by the terms and conditions of award for the closeout of expired projects, **provided that proper notice about the reporting delay is given by the recipient to the agency**. This delay may not exceed one year.

**What is NIH’s guidance on LATE APPLICATIONS for institutions impacted by COVID-19?**

<https://grants.nih.gov/grants/guide/notice-files/NOT-OD-20-082.html?utm_source=dlvr.it&utm_medium=twitter>

**Late applications**

When delays occur because the applicant or recipient organization is officially closed or unable to submit grant applications due to the effects of COVID-19, the NIH will consider accepting applications late, on a case-by-case basis, in accordance with the NIH Grants Policy Statement, [Section 2.3.9](https://grants.nih.gov/grants/policy/nihgps/html5/section_2/2.3.9_application_receipt_information_and_deadlines.htm), 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.