

Grants and Research during the COVID-19 Epidemic

Version 1.0

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Below is a list of frequently asked questions that NASA has received from award proposers and recipients (both recipients with COVID-19-related awards and those with other types of NASA awards) affected by the COVID-19 crisis. Please note that these administrative relief flexibilities as outlined in the OMB Memo M-20-17 are time-limited and will be reassessed on June 18, 2020. After that point, NASA will reassess its guidance to determine whether additional updates are required.

1. Can universities pay soft-money researchers from NASA grants while the labs are closed?

Universities may allow the payment of soft-money researchers using NASA grant funds, as well as graduate students, post-docs, and other lab staff during the COVID-19 epidemic if the institution's policies allow it. According to the OMB Memo (M-20-17):

Agencies may allow recipients to continue to charge salaries and benefits to currently active Federal awards consistent with the recipients' policy of paying salaries (under unexpected or extraordinary circumstances) from all funding sources, Federal and non-Federal. Awarding agencies may allow other costs to be charged to Federal awards necessary to resume activities supported by the award, consistent with applicable Federal cost principles and the benefit to the project. Recipients are required to maintain appropriate records and cost documentation as required by 2 CFR § 200.302 – Financial management and 2 CFR § 200.333 - Retention requirement of records to substantiate the charging of any salaries and other project activities costs related to interruption of operations or services.

2. What is the process for issuing incremental funding? How will funding increases be addressed when work has not been able to proceed? No-cost extensions (NCEs) are not enough due to paying individuals to maintain lab capability during closures.

As in the response to #1 (above), OMB Memo M-20-17 allows for institutions to charge restart costs to their grants:

Awarding agencies may allow recipients to continue to charge salaries and benefits to currently active Federal awards consistent with the recipients' policy of paying salaries (under unexpected or extraordinary circumstances) from all funding sources, Federal and non-Federal. Awarding agencies may allow other costs to be charged to Federal awards necessary to resume activities supported by the award, consistent with applicable Federal cost principles and the benefit to the project. Awarding agencies may also evaluate the grantee's ability to resume

the project activity in the future and the appropriateness of future funding, as done under normal circumstances based on subsequent progress reports and other communications with the grantee. Awarding agencies must require recipients to maintain appropriate records and cost documentation as required by 2 CFR §200.302 — Financial management and 2 CFR §200.333 — Retention requirement of records to substantiate the charging of any salaries and other project activities costs related to interruption of operations or services.

Individual NASA programs are able to make use of the 2 CFR 200 flexibility stated above to allow costs associated with resuming funded grant activities to be charged to currently active grants. However, the decision as to if awards negatively impacted by the COVID-19 crisis will be provided additional funding will have to be made on a program-by-program basis. Award recipients must not assume that NASA will be able to provide additional funding to cover funding losses associated with the COVID-19 crisis.

3. How will unreleased grant funding be impacted?

Currently, several staff members at the NASA Shared Services Center (NSSC) routinely work remotely; therefore, there is no anticipated interruption of grant processing at this time.

4. Personal Protective Equipment (PPE) was purchased using grant funding. Can PPE be donated to local first responders?

Donating Personal Protective Equipment (PPE) purchased with NASA grant funding to first responders is allowed under grants directly related to the COVID-19 emergency response and grants not related to the COVID-19 response on a case-by-case basis. However, the recipient should not assume that additional funds are available should the costs of donating the equipment result in a shortage of funding or supplies at a later date. Additionally, before donating the PPE, recipients must first notify and obtain approval from their cognizant NASA program office. The recipient must also document and maintain records on all PPE donated to local first responders in response to the COVID-19 crisis.

5. Viral DNA Isolation Kits were purchased using grant funding. Can the kits be donated to local first responders?

Donating Viral DNA Isolation Kits purchased with NASA grant funding to first responders is allowed under grants directly related to the COVID-19 emergency response and grants not related to the COVID-19 response on a case-by-case basis. However, the Recipient should not assume that additional funds are available should the costs of donating the equipment result in a shortage of funding. Additionally, before donating the Viral DNA Isolation Kits, recipients must first notify and obtain approval from their cognizant NASA program office. The recipient must also document and maintain records on all Viral DNA Isolation Kits donated to local first responders in response to the COVID-19 crisis.

6. How will NASA programs address funding opportunity due dates and proposals submitted late due to the COVID-19 crisis?

On a program-by-program basis, NASA may extend the deadlines for specific funding opportunities or may allow proposals started before the due date but submitted after the due date as a result of the COVID-19 crisis to be considered for funding. All funding opportunities and their current due dates can be found on the NASA Solicitation and Proposal Integrated Review and Evaluation System (NSPIRES) and Grants.gov. If a current funding opportunity deadline remains unchanged and a proposer cannot meet that deadline due to COVID-19, then the proposer should contact the cognizant NASA program office to discuss the issue.

7. Can fringe benefits policies be amended to incorporate emergency paid leave for staff retention purposes?

Recipients are authorized to continue to charge salaries and benefits to currently active Federal awards consistent with the recipient organization's policy of paying salaries (under unexpected or extraordinary circumstances) from all funding sources, Federal and non-Federal. The recipient must also document and maintain records to substantiate the charging of any salaries and other project activities costs related to interruption of operations or services.

8. Is there a limitation on when salaries and benefits should charge to an award?

OMB Memo M-20-17 offers relief to recipients without any limitation. If salaries and benefits are budgeted items of an award, then anyone performing activities under that award would be allowed to charge their salary and benefits to the award as long as there is funding available and as long as it is consistent with the entity's policy for paying salaries. The recipient must also document and maintain records to substantiate the charging of any salaries and other project activities costs related to interruption of operations or services.

9. Does NASA plan to address changes to Indirect Cost rates that may have occurred because of increased costs in certain activities?

No, recipients may continue to use the currently approved indirect cost rates (i.e., predetermined, fixed, or provisional rates) to recover their indirect costs on Federal awards. Agencies may approve grantee requests for an extension on the use of the current rates for one additional year without submission of an indirect cost proposal. Agencies may also approve grantee requests for an extension of the indirect cost rate proposal submission to finalize the current rates and establish future rates.

10. What is NASA's guidance for entities whose System for Award Management (SAM) registration have expired or set to expired in 60 days?

Current registrants in the System for Award Management (SAM) with active registrations expiring between March 19 and May 17, 2020, will be automatically afforded a one-time extension of 60 days. The General Services Administration (GSA) has initiated 60-day extensions to SAM.gov registrations that have expiration dates within this range, and it will take the GSA until March 28, 2020 to complete all extensions. This effort is intended as relief for those otherwise required to re-register during that period.

GSA anticipates 61,298 registrations will be impacted by these extensions and plans to process the extension under the following timeline:

Date	Action
3/18/2020	Registrations expiring on 3/19/2020 extended to 5/17/2020.
3/19/2020	Registrations expiring from 3/20/2020 to 3/23/2020 extended by 60 days.
3/23/2020 to 3/27/2020	Registrations expiring from 3/24/2020 to 5/17/2020 extended 60 days. Extensions will be processed at a rate of about twelve thousand per day.
3/28/2020	Actions Complete