

NSF Guidance on the Effects of COVID-19 on Human Subjects Research

April 13, 2020

NSF has received questions with regard to how human subject protections regulations (45 CFR § 690) apply to the activities of institutions and investigators in response to the COVID-19 outbreak. NSF understands that for a large number of studies, the conditions and timeline for conducting human subjects research have become unpredictable. NSF offers the following clarification to the research community.

NSF typically requires that all projects involving human subjects must either have approval from an Institutional Review Board (IRB) before issuance of an NSF award, or a determination that the project is exempt from review. NSF understands that given the current COVID-19 pandemic, many IRBs have suspended their activities. Accordingly, NSF will accept a review pending determination notice in place of an approval or exemption determination. NSF will be flexible with the form that this notice takes, as long as it makes clear that no work with human subjects, including recruitment, will be conducted until full IRB approval is obtained. The PI may conduct preliminary or conceptual work that does not involve human subjects while the protocol is being developed or under review, consistent with institution guidelines. In such cases, NSF will add conditions to the grant that prevent any research involving human subjects from being carried out until IRB approval has been obtained.

IRBs, institutions, and individual researchers may wish to consult the Office of Human Research Protections' [guidance on COVID-19](#).