

Revised May 19, 2020

NSF Implementation of [OMB Memorandum M-20-17](#), entitled, “*Administrative Relief for Recipients and Applicants of Federal Financial Assistance Directly Impacted by the Novel Coronavirus (COVID-19) due to Loss of Operations*” dated March 19, 2020

As we face new and unique challenges in confronting the COVID-19 epidemic, NSF is prioritizing the health and safety of the research community. NSF understands the effects this challenge will have on NSF-funded research and facilities, and we are committed to providing the greatest flexibilities to support your health and safety as well as your work. NSF is continually updating guidance and our online resources to keep you informed. NSF is also accepting proposals for non-medical, non-clinical-care RAPID research on coronavirus—our ability to better understand the virus and how to effectively respond will be crucial to public health efforts. The latest information is available on our website at: [nsf.gov/coronavirus](https://www.nsf.gov/coronavirus).

The purpose of this guidance is to implement flexibilities authorized by Office of Management and Budget (OMB) Memorandum [M-20-17](#) from specific administrative, financial management, and audit requirements contained in 2 CFR Part 200, *Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards*, without compromising accountability requirements. NSF recipients are reminded of the requirement to maintain appropriate records and documentation necessary to support charges to NSF awards.

Please note that, pursuant to OMB guidance, these administrative relief flexibilities are intended to be time limited. OMB plans to reassess their applicability within 90 days and NSF will update our guidance, as needed, at that time. Except where noted below, the following flexibilities are applicable to NSF proposers and awardees affected by the loss of operational capacity and increased costs due to the COVID-19 crisis.

1. Flexibility with SAM registration. (2 CFR § 200.205)

Current registrants in the System for Award Management (SAM) with active registrations expiring before May 16, 2020, automatically will be afforded a one-time extension of 60 days.

2. Flexibility with application deadlines. (2 CFR § 200.202)

NSF has extended the deadline dates for specific funding opportunities. A [listing](#) of these extensions is available on the Foundation’s [COVID-19 webpage](#). Deadline dates for funding opportunities that do not appear on the list remain unchanged. Recipients who are unable to meet stated deadlines should contact the cognizant NSF Program Officer to discuss the issue. NSF will consider extensions on a case by case basis.

3. Waiver for Notice of Funding Opportunities (NOFOs) Publication. (2 CFR § 200.203)

This flexibility is not applicable to NSF. NSF funding opportunities with deadline dates are normally published a minimum of 90-days prior to the proposal due date.

4. No-cost extensions on expiring awards. (2 CFR § 200.308)

Recipients must follow standard policies and procedures specified in the NSF *Proposal and Award Policies and Procedures Guide* (PAPPG) [Chapter VI.D.3](#), and applicable award conditions regarding submission of grantee and NSF-approved no-cost extensions.

5. Abbreviated continuation requests. (2 CFR § 200.308)

For purposes of NSF, a continuation request consists of submission of the requisite annual project report in Research.gov, as well as any award specific requirements. See item 10 below for additional information.

6. Allowability of salaries and other project activities. (2 CFR § 200.403, 2 CFR § 200.404, 2 CFR § 200.405)

Recipients are authorized to continue to charge salaries, stipends, and benefits to currently active NSF awards consistent with the recipients' policy of paying salaries (under unexpected or extraordinary circumstances) from all funding sources, Federal and non-Federal. The recipient also is authorized to charge other costs to NSF awards that are necessary to resume activities supported by the award, consistent with applicable Federal cost principles and the benefit to the project. Recipients must not assume that supplemental funding will be available should the charging of such costs or other fees result in a shortage of funds to eventually carry out the project. If a shortfall is anticipated, recipients must contact the cognizant NSF Program Officer to discuss the situation. NSF will 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 project reports and other communications with the recipient. 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.

7. Allowability of Costs not Normally Chargeable to Awards. (2 CFR § 200.403, 2 CFR § 200.404, 2 CFR § 200.405)

Recipients who incur costs related to the cancellation of events, travel, or other activities necessary and reasonable for the performance of the award, or the pausing and restarting of grant funded activities due to the public health emergency, are authorized to charge these costs to their award without regard to 2 CFR § 200.403, *Factors affecting allowability of costs*, 2 CFR § 200.404, *Reasonable costs*, and 2 CFR § 200.405, *Allocable costs*. Recipients may charge the full cost to the award when the event, travel, or other activities is conducted under the auspices of the grant. Recipients must not assume that supplemental funding will be available should the charging of cancellation or other fees result in a shortage of funds to eventually carry out the event or travel. If a shortfall is anticipated, recipients must contact the cognizant NSF Program Officer to discuss the situation. 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 cancellation or other fees related to interruption of operations or services.

8. Prior approval requirement waivers. (2 CFR § 200.407)

Recipients are only required to obtain NSF prior approval for the following program or budget-related reasons specified in 2 CFR § 200.308(c):

- Change in the scope or the objectives of the project;
- Change in a Principal Investigator (PI) or co-PI specified in an NSF award;
- The transfer of funds budgeted for participant support costs to other categories of expense;
- Unless described in the proposal and funded in the approved NSF award, the subawarding or transferring out of any work under an NSF award; and
- The need arises for additional NSF funding to complete the project.

The above requests for prior approval must be submitted via Research.gov. All other prior approvals specified in the applicable Prior Approval Matrix are waived. Recipients are reminded that they are to ensure that all costs charged to NSF awards must be consistent with Federal cost policy guidelines and the terms of the award, except as specified in this guidance.

In addition to the prior approval requirements specified above, Major Facility Recipients who are subject to the *Modifications and Supplemental Financial & Administrative Terms and Conditions for Major Multi-User Research Facility Projects and Federally Funded Research and Development Centers* (dated February 12, 2019) should note that, with the exception of Article 60, Contract Requirements, prior approval requirements are waived.

9. Exemption of certain procurement requirements. (2 CFR § 200.319, 2 CFR § 200.321)

NSF has waived the procurement requirements contained in 2 CFR § 200.319(b) regarding geographical preferences and 2 CFR § 200.321 regarding contracting with small and minority businesses, women's business enterprises, and labor surplus area firms.

10. Extension of financial and other reporting. (2 CFR § 200.327, 2 CFR § 200.328)

NSF does not require recipients to submit Federal Financial Reports for each award as financial data is extracted from NSF's Award Cash Management Service. NSF will continue to process daily grant payments to recipients from the Award Cash Management Service without interruption.

NSF has automatically extended the due date for submission of all annual project reports due between March 1 and April 30, 2020, by 30 days. These project reports must continue to be submitted via Research.gov. Recipients are reminded that NSF cannot make any new award or supplement any existing award, if the principal investigator (PIs) or any co-PI(s) has an overdue annual project report; therefore, it is vital that annual reports are submitted by the revised due date.

Additionally, NSF has waived the Annual Inventory reporting for Federally-owned Property § 200.312(a) – *Federally-owned and Exempt Property*, if a Recipient is unable to perform its

physical inventory per 2 CFR § 200.313(d)(2) 2 – *Equipment*, due to impacts of COVID-19. For awards ending or in closeout, recipients must contact the cognizant NSF Program Officer to discuss any issues with performing a final physical inventory related to disposition.

11. Extension of currently approved indirect cost rates. (2 CFR § 200.414)

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. Recipients may request an extension on the use of the current rates for one additional year without submission of an indirect cost proposal. Recipients also may submit a request to its cognizant agency for an extension of the indirect cost rate proposal submission to finalize the current rates and establish future rates.

12. Extension of closeout. (2 CFR § 200.343)

NSF has automatically extended the due date for submission of all final project reports and Project Outcomes Reports due between March 1 and April 30, 2020, by 30 days. These final reports must continue to be submitted via Research.gov. Recipients are reminded that NSF cannot make any new award or supplement any existing award if the PI or any co-PI(s) has an overdue final report; therefore, it is vital that final reports be submitted by the revised due date.

NSF also has automatically extended the closeout period for awards that ended between November 30, 2019 and April 30, 2020 to 180 days.

13. Extension of Single Audit submission. (2 CFR § 200.512)

Recipients and subrecipients that have not yet filed their single audits with the Federal Audit Clearinghouse as of the date of the issuance of the OMB Memorandum that have fiscal year-ends through June 30, 2020, are authorized to delay the completion and submission of the Single Audit reporting package, as required under Subpart F of 2 CFR § 200.501 – *Audit Requirements*, to six (6) months beyond the normal due date. No formal approval for this extension is required; however, recipients and subrecipients must maintain documentation of the reason for the delayed filing. Recipients and subrecipients who currently qualify as a “low-risk auditee” under the criteria of 2 CFR § 200.520(a), and who take advantage of this extension will continue to qualify as a “low-risk auditee”, absent other reasons for a change in qualification.

Any questions about the guidance described above should be directed to policy@nsf.gov. Any questions specific to a particular award should be directed to the cognizant NSF Program Officer.