

Frequently Asked Questions (FAQs) About the Coronavirus Disease 2019 (COVID-19) for National Science Foundation (NSF) Proposers and Awardees

March 26, 2020

The following addresses questions associated with the NSF proposal and award process that may arise in relation to COVID-19. Given that COVID-19 and the associated impacts continue to evolve, proposers and awardees are strongly encouraged to monitor [NSF's COVID-19 website](#) for updates.

Unless announced on [NSF's website](#), proposal deadlines, target dates, and submission windows remain unchanged. NSF will continue to review proposals using *ad hoc* reviews and virtual panels, enabling the agency to maintain a high-quality and timely merit review process.

1. I have a question related to COVID-19's potential impact on my research project, project-related travel, or field work. Where are some of the places I can find helpful information?

Your employing organization is an ideal starting point. In many cases, organizations have created websites that provide information.

Beyond that, we encourage you to consult the following resources:

- COVID-19 in general: see the [Centers for Disease Control \(CDC\)](#) and [World Health Organization \(WHO\)](#) websites, and also refer to your state or local health department;
- Travel to/from and quarantine in foreign countries: see the [State Department Travel Advisories website](#); and
- [NSF Guidance for Major Facilities and Contracts Regarding COVID-19.](#)

2. Will NSF provide for an extension to my award if the planned activities are disrupted by the COVID-19 public health threat?

Recipients must follow the 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.

3. I am a PI on an NSF-funded Conference or Travel award, but the meeting has been canceled. Who do I contact regarding the impact to the NSF award?

You should contact the cognizant NSF program officer about this situation. In light of the public health threat, you may wish to consider alternate plans, such as providing or using options for virtual participation. In addition, NSF program officers will be open to

rescheduling the conference or using the funds for a future meeting that is consistent with the original scope and objectives of the award.

4. A conference has been canceled, but I have nonrefundable travel and/or hotel costs. Can these be charged to an NSF Conference or Travel grant?

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.

Recipients are reminded of the requirement to maintain supporting documentation in the event that a review is performed in the future.

5. I am involved with a Conference or Travel award for a meeting that is taking place in the coming weeks. Should I continue with plans for the meeting?

NSF recommends first reaching out to the conference organizer or host. They are best equipped to understand the guidance at the location of the event. They may recommend having contingency plans if the event is ultimately cancelled or re-located, or might be planning to provide options for virtual participation. If you are the organizer, you may wish to consider developing contingency plans.

We also suggest checking the [State Department Travel Advisories website](#) if the conference involves foreign travel.

6. I am considering submitting a Conference or Travel proposal to NSF for a future meeting. The site of the meeting has not yet been selected; should I take into account COVID-19 in conference planning and site selection?

Travel logistics, accessibility, and health and safety considerations of the participants should always be a foremost consideration in any Conference proposal. Since the COVID-19 threat is still evolving, it is important to consider flexibility and alternative plans in a

proposal to support travel or a conference. For foreign travel, you should consult the [State Department Travel Advisories website](#).

7. My NSF grant involves an exchange of researchers (including students) and/or other foreign travel. Should I continue with plans?

Travel logistics, accessibility, and health and safety considerations of the participants in an active research project should always be a foremost consideration. NSF recommends consulting with your organization about its policies and procedures. You may consider approaching the planned researcher exchanges and/or other foreign travel with flexibility, and/or devising alternate plans including virtual participation as appropriate. As noted above, NSF understands that plans for active research projects may be disrupted, to the point of needing extensions on the original award durations. For foreign travel, you should consult the [State Department Travel Advisories website](#).

8. I am quarantined for a period of time. There is an NSF proposal deadline during my quarantine period and some essential materials I need are in my office. Can I receive an extension to the deadline?

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.

9. My university has asked staff to stay home for an undetermined period of time. How would I petition for an extension of a proposal deadline?

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.

10. Which prior approvals are still *required* to be submitted to NSF during the time period for which the administrative relief flexibilities referenced in [NSF's implementation of OMB Memorandum M-20-17](#) apply?

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

- (i) Change in the scope or the objective of the project or program (even if there is no associated budget revision requiring prior written approval).

- (ii) Change in a key person specified in the application or the Federal award.
- (iii) The disengagement from the project for more than three months, or a 25 percent reduction in time devoted to the project, by the approved project director or principal investigator.
- (iv) The inclusion, unless waived by the Federal awarding agency, of costs that require prior approval in accordance with Subpart E—Cost Principles of this part or 45 CFR part 75 Appendix IX, “Principles for Determining Costs Applicable to Research and Development under Awards and Contracts with Hospitals,” or 48 CFR part 31, “Contract Cost Principles and Procedures,” as applicable.
- (v) The transfer of funds budgeted for participant support costs as defined in § 200.75 Participant support costs to other categories of expense.
- (vi) Unless described in the application and funded in the approved Federal awards, the subawarding, transferring or contracting out of any work under a Federal award, including fixed amount subawards as described in § 200.332 Fixed amount subawards. This provision does not apply to the acquisition of supplies, material, equipment or general support services.
- (vii) Changes in the approved cost-sharing or matching provided by the non-Federal entity.
- (viii) The need arises for additional Federal funds to complete the project.

11. Which prior approvals are *waived* by NSF during the time period for which the administrative relief flexibilities apply?

Recipients are required to obtain the prior approvals specified in 2 CFR § 200.308 (c) (i-viii) which must be submitted via Research.gov. All other prior approvals specified in the [Research Terms and Conditions Appendix A Prior Approval Matrix](#) (applicable to institutions of higher education and non-profit organizations) and the [NSF Prior Approval Matrix for State and Local Governments and For-Profit Organizations](#) are waived. For example, incurring project costs more than 90 calendar days pre-award is listed in the matrices as required for NSF. During the administrative relief flexibilities time period, however, this prior approval and all others listed in the matrices are waived for NSF grants, except for those specified in 2 CFR § 200.308 (c) (i-viii).

12. Will NSF recipients be able to draw grants funds without delay?

NSF will continue to process daily grant payments to recipients through ACM\$ without interruption during the COVID-19 epidemic.

13. How will COVID-19 impact previously scheduled site visits?

For any previously scheduled site visits, NSF staff will contact the awardee to make alternative arrangements, such as videoconferencing, to meet with the project team and review documentation. In cases where the presence of NSF staff on site is essential, NSF staff may make an in-person visit at a later date.

Questions Regarding Research Experiences for Undergraduates (REU) Sites, Research Experiences for Teachers (RET) Sites, International Research Experiences for Students (IRES) Sites, and Similar Activities

The following questions refer to "REU Sites" but are relevant to a range of NSF programs that issue grants to fund cohorts of participants in research and other activities over weeks or months.

R1. I am hosting an REU Site. If a student arrives who appears sick, can I ask the student to return home?

Please follow the appropriate policies and practices of your organization. NSF defers to awardees on decisions regarding the safety and security of their faculty, students, and other personnel. Under the current circumstances, it would be prudent for Site directors to develop a plan, in concert with their organization's policies and practices, for handling the case of a student who appears ill or becomes ill.

R2. I am hosting an REU Site involving the participation of non-local students. A student from another university arrived and appeared to be ill. Health authorities have ordered that the student be quarantined. Can I use the REU Site grant funds to cover the cost of housing and meals for that student during the quarantine period, even though the student is unable to participate in REU Site activities?

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- R3. I am a PI for an NSF-funded REU Site, conference, or research project in which the investigators are geographically distributed. I am considering replacing the planned face-to-face interactions with the use of virtual technology. Beyond simple videoconferencing, I would like to use augmented reality or other technology to make the interactions more effective. May I submit a supplemental funding request to purchase and distribute the necessary equipment and/or contract with a service provider?**

Contact the cognizant NSF Program Officer managing your award. Supplements can be made to address unexpected events that threaten the original scope and objectives of an award, but the award of a supplement is contingent on the availability of funding at NSF. The Program Officer may also want to discuss whether the changes would constitute a "change in objectives or scope" of the award.

- R4. Is NSF canceling or discouraging the operation of all REU Sites that were scheduled to operate during the summer of 2020?**

No. REU Sites are funded by individual NSF grants, and grantees are responsible for making decisions about how to manage their grant-funded activities based on their organizational policies, their local conditions, the timing of the activities, the particular students and faculty who would participate in the activities, and other factors. Decisions about whether or how to operate REU Sites will vary from one grantee to another. NSF is not prescribing a "one size fits all" approach. In making decisions, we encourage grantees to consult the resources mentioned at the beginning of the "Frequently Asked Questions (FAQs) About the Coronavirus Disease 2019 (COVID-19) for National Science Foundation (NSF) Proposers and Awardees."

- R5. What if my organization decides to cancel our NSF-funded REU Site for this summer? Do we need permission from NSF?**

Contact the cognizant NSF Program Officer about this situation. REU Program Officers are open to the use of no-cost extensions to allow a postponement of this year's Site to a future year. All NSF grants are eligible for a one-year grantee-approved no-cost extension and then further extensions as approved by NSF. If you cancel your REU Site this summer and would like an extension because of the COVID-19 disruption: (1) Report the need and your plan to the cognizant NSF Program Officer for your award. (2) Describe the situation in your next Annual Project Report, particularly in the "Changes/Problems" section of the report. (3) When you submit the relevant "notification" (Grantee-Approved No-Cost Extension) or "request" (NSF-Approved No-Cost Extension) in Research.gov, describe the circumstances in detail in the "Justification" section of the form. If these steps are followed, the postponement should *not* require the submission of a request for "Changes in Objectives or Scope" via Research.gov.

R6. What if I could still operate my REU Site this summer but would need to restructure it in some way? Would that require permission from NSF?

Contact the cognizant NSF Program Officer about your situation. Program Officers are aware that running an NSF-funded activity in face of the COVID-19 situation may require flexibility and creativity, and different grantees will take different approaches. Besides some cancellations/postponements of REU Sites, program officers have heard from grantees that propose to convert their Site to a virtual Site (with online training modules, online lab visits, mediated virtual research, etc.) or "distributed" Site, run a shorter Site (one that would start later in the summer), enroll only students within driving distance from campus (but not regular students at the host university), or move the research location of a Site (for example, move an international REU Site, which was scheduled for a "no travel" zone, to the mainland United States so that there is a better chance that it might be able to operate this summer). Other restructurings are also possible. Students' research projects constitute the core component of an REU Site, the conduct of authentic research. While not all types of research are suitable for conversion to an online experience, virtual Sites may be allowed when the quality of students' experience is maintained and when the virtual research will enable the students to have outcomes similar to the original project design. When you outline your idea to your Program Officer, if the idea represents a *major* departure from the plans in your NSF award, the Program Officer might recommend that you submit a request for "Changes in Objectives or Scope" via Research.gov. In some cases, a request for "Reallocation of Funds Provided for Participant Support Costs" might also be required if there is a need to rebudget Participant Support Costs.

R7. If the REU Site that I direct is canceled, postponed, or re-timed this summer, when will my Annual Project Report be due?

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 (PI) 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.

R8. Suppose that my organization cancels our NSF-funded REU Site this summer, but I have already accepted students for the Site. May I guarantee slots for next summer to students who were accepted for this summer? If so, what about students who will graduate and thus would not be eligible "undergraduates" next summer?

If you wish to extend offers to students for next summer, follow your organization's policies and procedures. If you wish to include any students who will receive their bachelor's degree before next summer, contact the cognizant Program Officer for your

REU Site award, who might approve this exception through e-mail. Also describe your plan in your next Annual Project Report.

- R9. Suppose that my organization cancels our NSF-funded REU Site this summer. Can expenses that have already been incurred prior to the cancellation of the Site be charged to the NSF grant? What about nonrefundable airline tickets that students purchased to travel to the Site? What about nonrefundable dorm or housing deposits that either students or my program (on behalf of the students) put down earlier?**

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- R10. I direct an REU Site and still plan to operate it this summer (although that plan could change). May I require that all students be tested for COVID-19 before participating in the REU Site? If so, could the cost of these tests be charged to the NSF grant?**

Please follow the appropriate policies and practices of your organization. NSF defers to awardees on decisions regarding the safety and security of their faculty, students, and other personnel. In general, if your organization were to require *all similarly situated students* (i.e., all those participating in activities on campus during the summer months) to be tested, the costs for the tests for your REU students could be charged to the grant. (This answer should not be construed as a recommendation for such a requirement.)

- R11. I direct an REU Site and still plan to operate it this summer -- but that plan could change at any time. Can students or my university charge travel insurance to the NSF grant, which would allow the cancellation of travel at the last minute without losing money on the tickets? If I have to change the start date of my REU Site (and the students' airline tickets have not been insured), could ticket change fees be charged to the NSF grant if the airlines have not waived them?**

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- R12. My organization recently decided to cancel our NSF-funded REU Site for this summer, but I have already accepted students, who declined offers from other Sites. May I pay those students their stipend, or at least part of their stipend, for the summer even though they will not be participating in my REU Site? At this point, some of those students may not be able to find other opportunities for research or employment for the summer.**

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.