Research Impact of Coronavirus Disease 2019 (COVID-19)

Feb 6, 2021

The potential impact of the respiratory illness COVID-19 continues to evolve. UCSF Office of Sponsored Research (OSR) and Contracts and Grants Accounting (CGA) are actively monitoring the impacts to research activities and funding.

The Office of Sponsored Research (OSR) is working remotely and remains open for business during the present public health emergency. Currently federal agencies are very flexible (see Sponsor Guidance below) about deadlines under difficult circumstances beyond our control. However, if agencies are officially closed, proposals will most likely remain in a queue, pending resumption of agency operations? as has been the case during federal budget-related shutdowns. The OSR, Office of Clinical Trial Activation (OCTA), and Contracts and Grants Accounting (CGA) are working to ensure continuity of services for researchers, as well as prioritizing COVID-19 research and clinical trials.

**If you have unanswered questions or needs related to COVID-19, please send them to this centrally-monitored email so that the issues are assigned for appropriate follow up:** emer.mgt@ucsf.edu

This page will be regularly updated to provide information regarding the following:

- Sponsor Specific Guidance
- Impact to Research Funding
- Funding Opportunities related to COVID-19
- Additional Resources
  - UCSF Resources
  - UC Resources
  - COGR Resources
  - Other

**Sponsor Specific Guidance**

This section is being updated daily and provides a summary of guidance collected from various notices and FAQs from the Sponsors noted. Below are the topics covered. Please work with your OSR Staff if you need to notify a Grants Office or Program Officer regarding any of these topics.
Late Submission Policy

Exception to the policy for post-submission materials (NOT-OD-19-083) for applications submitted for the January 2021 council (beginning with applications submitted for the May 25, 2020 due date for Fall 2020 review meetings). NIH, AHRQ, and NIOSH will accept a one-page update with preliminary data as post-submission materials for applications submitted under all activity codes, ONLY if the Funding Opportunity Announcement (FOA) used for submission allowed preliminary data in the application. One page of preliminary data will be accepted for single component applications or for each component of a multi-component application.
NIH has charted the Application Review Process to be followed during the COVID-19 pandemic. The chart covers flexibilities provided for the current and next round of peer review.

(UPDATED 11/4/20) NIH will not consider contingency plans regarding the COVID-19 pandemic in applications for funding (NOT-OD-21-026). Contingency plans will not be considered during the peer review process.

(UPDATED 11/5/20) NIH may not require use of single IRB for research with an approved exception. These exceptions represent an effort to prioritize the health and safety of both research subjects and investigators, and provides flexibility to institutions in seeking IRB review due to the unique challenges created by the COVID-19 outbreak. Please see NOT-OD-21-006 for details on NIH supported studies.

(UPDATED 9/30/20) NIH, AHRQ, AND NIOSH continues extension of exception to the policy for post-submission materials (NOT-OD-20-179 and NOT-OD-20-163 and NOT-OD-20-123) for applications submitted for the August/October 2021 Council. A one-page update with preliminary data will be accepted as post-submission materials, ONLY if the FOA used for submission of the application allowed preliminary data in the application.

(UPDATED 8/17/2020) NIH will be providing up to a two-receipt cycle extension (roughly eight additional months) of eligibility for prospective K99/R00 applicants who have/will reach the 4 year eligibility threshold while experiencing delays in application submission due to disruptions caused by the COVID-19 pandemic. The extension will apply only to eligible applicants submitting new and resubmission K99/R00 applications under parent announcements PA-20-187, PA-20-188, and PA-20-189, which will be automatically accepted by NIH. This extension is temporary and subject to change. K99 applicants who wish to receive non-COVID-related extensions, (e.g. for childbirth, adoption, family leave, etc.) must continue to provide relevant documentation.

Note: ICs are issuing Change Notices for specific FOAs announcing Changes to Key Dates, please check new Change Notices for extensions and date revisions in the NIH weekly Guide or by checking the browser version of the FOA for Related Notices.

| **NSF** | NSF has extended deadline dates for specific funding opportunities listed on the Foundation’s COVID-19 webpage. Deadline for funding opportunities that do not appear on the list remain unchanged. If unable to meet stated NSF deadlines please contact the cognizant NSF Program officer to discuss the issue ideally **BEFORE** the deadline. NSF will consider extension on a case-by-case basis. Principal Investigators should work with their RSC to follow guidance given by NSF Program Officer for submitting late application. NSF website has a list of impact on existing deadline dates.  

**SOURCE:** NSF COVID-19 FAQs, PAPPG Chapter 1.F, NSF Implementation of OMB M-20-17 |
| --- | --- |
| **DOD** | DOD recommends that program offices provide flexibility with upcoming proposal deadlines to the extent allowable by funding authorities and by the time needed for merit review of submitted proposals. Please contact the program officer and grants manager for the funding opportunity in question to request an application deadline extension. Proposers are encouraged to monitor grants.gov to see if an extension has been posted.  

**SOURCE:** FAQs for DOD Research Proposers and Awardees Impacted by COVID-19 |
| **DOD-USAMRAA** | There are currently no plans to modify existing deadline dates. Applicants should monitor Grants.gov for any potential changes to an application deadline.  

The unique and evolving circumstances related to COVID-19 create multiple challenges for conducting reviews that limit the extent to which timelines for funding can be delayed. Current funding opportunity announcement deadlines allow as much time as possible for application submissions, and further modification of application deadlines is not anticipated.  

- Contact CDMRP Helpdesk at help@eBRAP.org or 301-682-5507 for further assistance.  
- Please check the USAMRAA COVID-19 webpage periodically for future updates.  

**SOURCE:** USAMRAA’s COVID-19, USAMRAA Supplemental Guidance April 30, 2020 |
<table>
<thead>
<tr>
<th>Agency</th>
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<tbody>
<tr>
<td>CDC</td>
<td>CDC will consider extending the application due date beyond the date specified in the Notice of Funding Opportunity (NOFO) on a case-by-case basis. Principal Investigators should work with their RSC to submit your request to extend the NOFO deadline to the assigned grants management specialist/program official noted in the Notice of Funding Opportunity under Agency Contacts prior to the NOFO closing date. The request should include enough detail about the delay so that CDC can determine whether circumstances justify extending the NOFO application submission deadline. SOURCE: Flexibilities Available to Applicants and Recipients Affected by COVID-19 and FAQs</td>
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<tr>
<td>HHS-OASH*</td>
<td>No guidance at this time</td>
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<td>ACF</td>
<td>ACF will post specific guidance on its websites and/or provide a point of contact for an Agency program official. SOURCE: Administration for Children &amp; Family IM-ACF-OA-2020-01</td>
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<tr>
<td>AHRQ</td>
<td>(UPDATED 11/5/20) AHRQ may not require use of single IRB for AHRQ-funded research with an approved exception. These exceptions represent an effort to prioritize the health and safety of both research subjects and investigators, and provides flexibility to institutions in seeking IRB review due to the unique challenges created by the COVID-19 outbreak. Please see NOT-OD-21-002 for details on AHRQ-supported studies. SOURCE: NOT-HS-20-010, NOT-HS-21-002</td>
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<tr>
<td>SAMHSA</td>
<td>No guidance at this time.</td>
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**Pre-Award Costs**
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<tr>
<th>Agency</th>
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<tr>
<td>NIH</td>
<td>Pre-award costs may be incurred (at your own risk) up to 90 calendar days prior to the start date of the initial budget period as long as costs are necessary conduct the project and would be allowable, if awarded, without NIH prior approval.</td>
<td>NIH FAQs, NOT-OD-20-086, NIH Grants Policy Statement, Ch. 7, Exhibit 5</td>
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<tr>
<td>NSF</td>
<td>Pre-award costs may be incurred (at your own risk) up to 90 calendar days prior to the start date of the period of performance, as long as costs are made and document in accordance with the recipients’ procedures and is necessary for the effective and economical conduct of the project. Prior Approval required for pre-award costs for periods exceeding 90 days.</td>
<td>NSF PAPPG Chapter X.A.2.b</td>
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<td>DOD</td>
<td>Pre-award costs may be incurred (at your own risk) up to 90 calendar days prior to the start date of the period of performance, as long as costs are allowable charges to the project or program.</td>
<td>DOD Research &amp; Development (R&amp;D) General Terms and Conditions, Part 2, Article V., Section C, Financial and Program Management</td>
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<td>DOD-USAMRAA</td>
<td>Pre-award costs may be incurred (at your own risk) up to 90 calendar days prior to the start date of the period of performance, as long as costs are allowable charges to the project or program. Defers to (DoD Research &amp; Development (R&amp;D) General Terms and Conditions, Part 2, Article V., Section C, Financial and Program Management. Recipients should consult the Grant Officer regarding other potential prior approval waivers based on project-specific circumstances.</td>
<td>All costs charged to Federal awards must be consistent with Federal cost policy guidelines and the terms of the award, except where specified in OMB Memorandum M-20-17 - expired June 16, 2020 USAMRAA will extend flexibilities to awards that support efforts related to COVID-19 on a case-by-case basis. Please work with your OSR Staff to contact the Grants Management Specialist or Grants Officer’s Representative listed in the award document for information concerning individual awards.</td>
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**Carry Forward of an Unobligated Balance**

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<td>NIH</td>
<td>Under the Standard Terms of award, recipients of SNAP awards can carryover</td>
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<td>an unobligated balance to a subsequent budget period. Recipients of non-</td>
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<td>SNAP awards have the discretion to carry forward unobligated balances on</td>
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<td>their active award for immediate efforts to support activities related to</td>
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<td>or affected by COVID-19 as long as the charges are allowable costs and are</td>
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<td>within the scope of the original award.</td>
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<td>SOURCE: NIH GPS 8.1.1.2, NIH FAQs, NOT-OD-20-086, NOT-OD-20-087</td>
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<td>NSF</td>
<td>No guidance at this time</td>
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<td>DOD</td>
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<td>performance under the award is allowed.</td>
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<td>SOURCE: DOD Research &amp; Development (R&amp;D) General Terms and Conditions,</td>
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<td>Part 2, Article V., Section C, Financial and Program Management</td>
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<td>Organization</td>
<td>Guidance/Policy</td>
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<td>DOD-USAMRAA</td>
<td>Allows carry forward of an unobligated balance to a subsequent period of performance under the award. Defers to the DoD Research &amp; Development (R&amp;D) General Terms and Conditions, Part 2, Article V., Section C, Financial and Program Management. Recipients should consult the Grant Officer regarding other potential prior approval waivers based on project-specific circumstances. All costs charged to Federal awards must be consistent with Federal cost policy guidelines and the terms of the award, except where specified in OMB Memorandum M-20-17 - expired June 16, 2020. USAMRAA will extend flexibilities to awards that support efforts related to COVID-19 on a case-by-case basis. Please work with your OSR Staff to contact the Grants Management Specialist or Grants Officer’s Representative listed in the award document for information concerning individual awards. SOURCE: USAMRAA Supplemental Guidance March 25, 2020, FAQs from COGR March 19, 2020</td>
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<td>SAMHSA</td>
<td>SAMHSA is currently reviewing requests to carryover unspent funds from discretionary grant recipients that submitted carryover requests at the end of their last budget period. Recipients should wait to receive a response to their carryover request before submitting a new request to reallocate carryover funding. Recipients should notify their GMS of their intent to modify their carryover request. SOURCE: COVID-19 Information for SAMHSA Discretionary Grant Recipients</td>
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### No-Cost Extensions

| NIH | To support early career scientists whose career trajectories have been significantly affected by the pandemic, NIH will allow recipients of Fellowship (F) and Career Development (K) awards to request a no-cost extension. Eligible recipients should work with their RSC to submit a prior approval request to NIH and closely follow the instructions provided in NOT-OD-21-052.  
Under the Standard Terms of award, recipients may extend the final year of the approved project period of an active grant up to 12 months. Affected recipients that have active non-SNAP awards may extend the final budget period of the approved project period of an active grant up to 12 months, without prior approval, by working with their RSC to notify the assigned grants management specialist. 
To support participant health and safety, and continuity of research during this public health emergency, NIH will allow for additional extensions, including mid-project period extensions, for awards supporting NIH-funded clinical trials and human subjects research. 
NIH will allow awards supporting clinical trials and other human subjects research to extend beyond the typical 7-year timeframe for extensions related to COVID-19.  
SOURCE: NIH GPS 8.1.1.3, NIH FAQs, NOT-OD-20-086, NOT-OD-20-087, NOT-OD-21-052 |
|---|---|
| NSF | All NSF grants are eligible for a one-year recipient approved no-cost extension and then further extensions as approved by NSF. If you foresee a need for NSF-approved extensions, you should include that information in your annual report and discuss the need ahead of time with the cognizant NSF program officer for your award.  
SOURCE: NSF COVID-19 FAQs and (PAPPG), Chapter VI.D.3 |
| DOD | It is DOD policy that no-cost extensions be supported in all possible cases; however, be please be aware that funding expiration statutes may prohibit extensions. Please contact the DOD grants manager for award-specific guidance.  
SOURCE: FAQs for DOD Research Proposers and Awardees Impacted by COVID-19 |
| **DOD-USAMRAA** | Recipients have the authority to extend the period of performance one-time up to 12 months beyond the original completion date stated in the award by working with your OSR Staff to notifying the Grant Officer once you have assessed how much additional time will be needed.

Recipients of multiple awards should work with their OSR Staff to notify Grants Officer of multiple awards that need an extension. Applicable grant numbers should be included in the notification.

Additional time beyond the initial 12 months requires prior approval.

Please be aware that funding expiration status may prohibit extensions - recipients should contact the Grants Officer for award-specific guidance.

USAMRAA will extend flexibilities to awards that support efforts related to COVID-19 on a case-by-case basis. Please work with your OSR Staff to contact the Grants Management Specialist or Grants Officer?s Representative listed in the award document for information concerning individual awards.

**SOURCE:** USAMRAA Supplemental Guidance March 25, 2020, FAQs from COGR March 19, 2020 |
| **DAF-AFOSR** | The Air Force Office of Scientific Research (AFOSR) will allow recipients of awards impacted by COVID-19 that are active as of March 31, 2020 and scheduled to expire on or before December 31, 2020, to request a no-cost extension up to 12 months.

- Requests must come from the institution?s business officer addressed to the Program Officer (using appropriate email), Grant Officer, and AFOSR.RT.AdminSupport@us.af.mil.
- A grant modification will be issued by the Grant Officer.
- The no-cost extension is not official until it is signed by the Grant Officer.
- Awards expiring after December 31, 2020 that require a no-cost extension will be examined when the need arises.

**SOURCE:** AFOSR Memorandum to Grantees 26Mar2020 |
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| **CDC** | Due to the impact of COVID-19, CDC may extend awards that were active as of March 31, 2020, and scheduled to expire prior or up to December 31, 2020, automatically at no cost for a period of up to 12 months. No-cost extensions will be considered on a case-by-case basis. When CDC provides no-cost extensions, this will allow time for recipient assessments, the resumption of many individual projects, and a report on program progress and financial status to agency staff. Project-specific financial and performance reports will be due 90 days following the end date of the extension. CDC will examine the need to extend other project reporting as the need arises. Recipients should work with their RSC to reach out to their assigned grants management specialist/program official if they anticipate needing a no-cost extension.

SOURCE: Flexibilities Available to Applicants and Recipients Affected by COVID-19 |
| **HHS-OSHA* | No guidance at this time |
| **ACF** | Flexibilities are applicable to ACF applicants and recipients where the entity is conducting human service activities related to or affected by COVID-19. Affected entities are those that have been closed or that have business activities that are hindered due to COVID-19 precautionary measures and/or illnesses. Affected entities will be asked to provide documentation to the respective ACF Program Office describing the effects, including how long the program and ACF-related work or instruction were and/or will be affected. If permitted by law and at the discretion of appropriate Program Office, ACF will consider no-cost extension requests for awards active as of March 31, 2020 and scheduled to expire up to December 31, 2020, for a period up to 12 months, to allow time for recipient assessment, project resumption, and a report on program progress and financial status to ACF.

| **AHRQ** | Recipients of awards made under expanded authorities are allowed a one-time no-cost extension of the final year, up to 12 months and should notify AHRQ if this allowance is exercised. Recipients of awards not made under expanded authorities should request prior approval for a no-cost extension of the final year. Please work with your OSR Staff to execute either action as required by the award.

SOURCE: NOT-HS-20-010 |
SAMHSA understands that discretionary grant recipients are limited in their grant activities because of COVID-19. In these cases recipients should notify their GMS and GPO of their intent to submit a NCE. NCE forms are posted on the SAMHSA site.

SOURCE: COVID-19 Information for SAMHSA Discretionary Grant Recipients

Expenditure of Award Funds for Salaries, Stipends and Other Project Activities
OMB Memo M-20-17 (expired) allowed recipients to charge NIH awards for costs directly related to the affected grant project. OMB Memo M-20-26 (expired) extended the flexibility to charge salaries and benefits to active Federal awards during the period from June 18 to September 30, 2020, with additional caveats.

As of October 1, 2020, salaries and related benefits should not be charged to federal awards for individuals who are unable to perform any work on those awards.

All leave benefits remain allowable and should continue to be charged unless exhausted including vacation and COVID Paid Administrative Leave, etc. Outside of those leaves, any effort that is not benefitting the federal award must be redirected to another funding source effective October 1, 2020.

The Office of Sponsored Research and Contracts and Grants Accounting will update the campus if any additional guidance is provided by OMB, or particular sponsors (e.g. NIH). If you have any questions or concerns, please contact Winona Ward or Ellyn McCaffrey.


Salary supplementation for NRSA stipends is not a cost supported by an NIH project, and is not allowable. NIH remains committed to supporting and providing maximum flexibilities to its recipients; however, in doing so, NIH must remove options that would pose audit risks for unallowable charges.

Clarification: Stipends and other expenses may not be charged to NRSA awards for trainees and fellows who have not yet been appointed and cannot travel to the U.S. to start work on their NIH-funded projects.

Clarification: Recipients may not initiate charges for salaries and benefits on new awards where the work has not yet started. Recipients may only charge salaries and benefits when no work is performed on currently active awards, when their organization?s current policy allows for the charging of salaries and benefits to currently active awards (under unexpected or extraordinary circumstances) from all funding sources, Federal and non-Federal.

If the recipient?s performance site/facilities are open and/or telework options are available for work to begin, recipients may charge salaries and benefits to NIH grant awards.

Recipient institutions should consult with their Human Resources Department to determine whether there are internal policies in place allowing employees to take paid leave, and to charge the grant, regardless of the source of funds, e.g. emergency or disruptive event policies.

As a result of COVID-19, recipients conducting NIH-funded clinical trials and human subject studies may incur unanticipated costs (e.g. Costs incurred to arrange for participants to receive care at their local sites or virtually). Recipients should notify the funding IC of any changes necessary to maintain the health and safety of participants and staff.

While NIH ICs plan (based on availability of funds) to issue administrative supplements when absolutely necessary, COVID-19 related administrative supplement requests should be submitted:

- When the full impacts of the pandemic on the recipient's NIH supported research are clear
- When the recipient has had a chance to discuss the various options with relevant NIH staff and it was agreed that an administrative supplement is the best option for the project.

Exceptions to the above recommendations:
- Supplements to existing projects that will allow investigators to immediately address scientific questions of direct relevance to the COVID-19 epidemic
- Supplements that are needed to address immediate mission critical needs over the next 3 months.

Researchers that meet these exceptions should work with their OSR Staff to raise these issues with their program officers and/or grants management specialist prior to submitting requests.

Recipients should not assume the NIH ICs will provide additional funds to replace the donated PPE and supplies. Funding ICs should be consulted for specific details regarding supplemental support.

If project staff is required to perform their originally approved work remotely from a foreign country due to COVID-19 travel restrictions, where no grant funds are going to a foreign entity, NIH has determined that this scenario does not fit the definition of a foreign component as outlined in the NIH Grants Policy Statement (i.e. the performance of a significant scientific element or segment of the project outside of the US.)

SOURCE: NIH FAQs, NOT-OD-20-086, NOT-OD-20-087, COGR OUTREACH, OMB M-20-17, OMB M-20-18, NOT-CA-20-082, PA-18-591, PA-20-272
OMB Memo M-20-17 (expired) allowed recipients to charge NIH awards for costs directly related to the affected grant project. OMB Memo M-20-26 (expired) extended the flexibility to charge salaries and benefits to active Federal awards during the period from June 18 to September 30, 2020, with additional caveats.

As of October 1, 2020, salaries and related benefits should not be charged to federal awards for individuals who are unable to perform any work on those awards.

All leave benefits remain allowable and should continue to be charged unless exhausted including vacation and COVID Paid Administrative Leave, etc. Outside of those leaves, any effort that is not benefitting the federal award must be redirected to another funding source effective October 1, 2020.

The Office of Sponsored Research and Contracts and Grants Accounting will update the campus if any additional guidance is provided by OMB, or particular sponsors (e.g. NIH). If you have any questions or concerns, please contact Winona Ward or Ellyn McCaffrey.


NSF will evaluate the grantee’s ability to resume project activity in the future and appropriateness of future funding, based on subsequent project reports and other communications with the recipient.

Payroll costs paid with the Paycheck Protection Program (PPP) loans or any other Federal Coronavirus Aid, Relief, and Economic Security (CARES) Act programs must not be charged to current NSF awards.

Recipients are reminded of their responsibility to maintain appropriate records and cost documentation to substantiate any salaries and other project costs related to interruption of operations or services as required by 2 CFR 200.302 and 2 CFR 200.333.

SOURCE: NSF Implementation of OMB M-20-17, OMB M-20-26, NSF Implementation of OMB M-20-26, OMB M-20-26
In general recipients may rebudget funds to other activities because of the current situation, as long as the activities are allowable under the FOA and in line with the statutory requirements of the award. Recipients should contact their GPO and GMS about any such repurposing of funds.

Grant recipients have flexibility to rebudget (25% of the current budget or $250,000 whichever is less) as long as rebudgeting includes activities that are allowable under the FOA, within the scope of the grant, and in line with the statutory requirement of the award. Recipients must keep documentation of all costs and SAMHSA may request this documentation during the grant period.

If the amount to be rebudgeted is greater than 25% of the current budget or $250,000 whichever is less, the recipient MUST submit a COVID-19 post award amendment through the eRA Commons (see sample revised budget to be used).

Recipients may switch from planned face-to-face service/training/meetings to conducting these activities virtually. If budget modifications are needed to do this, recipients should submit a revision request.

SAMHSA grant funds can be used to purchase Personal Protective Equipment (PPE) for authorized grant personnel working in service of the grant. **SAMHSA grant funds cannot be used to purchase PPE for unrelated grant activities.**

SAMHSA grant funds can be used to purchase laptops and other devices to deliver training and services specified under the grant, including the purchase of software to facilitate the delivery of services and training. **SAMHSA grant funds cannot be used to purchase laptops and other devices for personal use or for clients. In addition, the purchasing of internet services for clients is not authorized.**

SOURCE: COVID-19 Information for SAMHSA Discretionary Grant Recipients
- Recipients must report on the effects of COVID-19 on the NIH funded research in their next RPPR submission. Recipients are not to submit standard letters, these details must be submitted within the RPPR. The funding IC will consider the effects that are reported by the recipient when reviewing and approving the RPPR.
- Recipients of NIH-funded clinical trials and human subject studies affected by COVID-19 should consult UCSF Directives to Clinical and Non-Laboratory Researchers about potential measures to protect participants and staff.
- If UCSF facilities are closed due to COVID-19 and research labs and results cannot be maintained due to the closure. Before submitting requests for administrative supplements: the full impacts of the pandemic on the NIH-supported research should be clear and recipients have worked with their OSR Staff to contact relevant NIH staff to discuss various options and agreed that an administrative supplement is the best option for the project.
- If a delay in research progress is anticipated recipients may extend the final budget period of the approved project period on active grants one time for up to 12 months without seeking prior approval from the NIH (see no-cost extension).
- CLOSEOUT REPORTS: If it is anticipated that there will be a delay in the submission of closeout reports (e.g. financial, performance, inventions, and other reports per the terms of award for the closeout of expired awards) due to the effects of COVID-19, under the standard terms of award, recipients may extend the final year of the project period up to 12 months (see No-Cost Extension). If award does not allow a no-cost extension and additional time is needed, work with your OSR Staff to notify the funding IC and the NIH Closeout Center at NIHCloseoutCenter@mail.nih.gov and provide a detailed justification on the effects of COVID-19 on the institution and grants where reporting will be delayed. Such delays may not exceed one year.
- Recipients of NIH awards for supplemental funding from the Coronavirus Preparedness and Response Supplemental Appropriations Act, 2020 (PL 116-123), are not required to submit an RPPR for these activities, special reporting requirements will be included in the terms and conditions of the award for all awards issued using COVID-19 funds. COVID-19 funds will be issued in separate subaccounts in the HHS Payment Management System, with a 'CV' suffix. In order to track these special appropriations, recipients will be required to submit separate Federal Financial Reports (FFRs) for these subaccounts.
- COVID-related flexibilities for updating and correcting study information in ClinicalTrials.gov: though important to ensure accurate and up-to-date clinical trial information is available to the public on ClinicalTrials.gov, particularly for COVID-19 related research, NIH acknowledges that delayed updates and corrections may be unavoidable due to the impact of the public health emergency on research-related staff. Refer to Top Questions from Responsible Parties Related to COVID-19 for information on specific questions.
- Foreign Postdoctoral Fellows on NIH-funded studies: if a foreign postdoctoral fellow is working in the U.S. on a NIH funded study and needs to return to his/her home country and will continue to work remotely on the study, this would qualify as a foreign component. If this is a consideration, please work with your OSR Staff to obtain prior approval to add a foreign component to the award and report as such on the RPPR.
- Delays to phased Career Development awards, research training awards, and fellowships: Phased awards (e.g. K22 or K99/R00) career development, research training awards and individual fellowships, that experience delays are allowed extensions by notifying the funding IC. Please work with your OSR Staff to prepare and submit such communications to the funding IC. Recipients of phased Career Development awards (e.g. K99/R00) who are unable to transition to faculty position due to delays caused by COVID-19 should with their mentors contact the funding IC in writing to provide details of the delays. Please work with your OSR Staff to prepare and submit communications to the funding IC. Due to the varying needs of T35 recipients, NIH will handle flexibilities for these awards on a case-by-case basis.

**Source:** NIH FAQs, NOT-OD-20-086, NOT-OD-20-087
USAMRAA will extend flexibilities to awards that support efforts related to COVID-19 on a case-by-case basis. Please work with your OSR Staff to contact the Grants Management Specialist or Grants Officer’s Representative listed in the award document for information concerning individual awards.

If the effects of COVID-19 impact the conduct of a DoD-supported human subjects research protocol, recipient should seek local guidance from their IRB and notify the USAMRAA Human Research Protection Office (HRPO) in the following circumstances:

- Substantive amendments require HRPO review and approval prior to implementation. HRPO will not require pre-approval of amendments intended to minimize the risk of COVID-19 exposure for study participants or study team members; follow local IRB review and approval and forward documents to HRPO via email at: usarmy.detrick.medcom-usamrmc.mbx.COVID-19@mail.mil
- Unanticipated problems involving risks to subjects and others, which include inadvertent exposure of research subjects or study personnel to COVID-19, missed or delayed safety assessments due to pandemic, inability to provide study product or conduct key research interventions. These should be promptly reported to the reviewing IRB and to HRPO via email at: usarmy.detrick.medcom-usamrmc.mbx.COVID-19@mail.mil
- Promptly report any actions taken to halt the conduct of ongoing human subjects research (e.g. pausing new enrollment, canceling follow-up procedures for previously enrolled subjects, etc.) due to the pandemic. Principal Investigators should review UCSF Interim Policy on Human Subjects-Related Research and contact HRPO via email at: usarmy.detrick.medcom-usamrmc.mbx.COVID-19@mail.mil to notify them of the University’s policy and make appropriate arrangements. UCSF is not contacting sponsors centrally at this time. See the open letter to research sponsors and collaborating institutions.
- Recipients must adhere to all other reporting and submission requirements specified in their HRPO approval memorandum.

SOURCE: USAMRAA Supplemental Guidance March 25, 2020, HRPO FAQs, FAQs from COGR March 19, 2020
Due to the impact of COVID-19, CDC may accept a brief statement from recipients for continuation requests scheduled to come in from April 1, 2020, to December 31, 2020, for projects with planned future support. CDC programs will post any specific instructions in their continuation guidance. CDC will use the brief statements to verify that recipients are in a position to resume or restore their project activities and accept a planned continuation award. CDC may examine the need to extend this approach on subsequent continuation award start dates as recipients have an opportunity to assess the situation.

SOURCE: Flexibilities Available to Applicants and Recipients Affected by COVID-19 and FAQs

If recipients are able to make temporary modifications of activities to accomplish project goals, a request for a change in scope must be submitted through Grant Solutions and approved by a Grants Management Officer. If the request states that the change is temporary and a result of COVID-19, the project scope will automatically revert back to the previously approved project (e.g. no request is required to return to the original scope). Recipients who are unable to conduct award activities during the public health emergency do not need to submit a request to change the scope or to rebudget. Instead, they should notify the Grants Management Specialist and Federal Project Officer listed on the Notice of Award that cessation of award activities has occurred. The request may be sent through Grant Solutions or via email. Prior approval is not required to resume project activities that had ceased. Recipients are responsible for reporting specific COVID-19 impacts that led to any cessation of project activities in their progress report for the affected period. Recipients should not assume additional funding will be available to offset the impacts of COVID-19 or to resume award activities to complete the project. Waivers are granted until the public health emergency ends but no more than 90 days.

SOURCE: HHS Memo to Recipients of OASH Grants and Cooperative Agreements
Flexibilities are applicable to ACF applicants and recipients where the entity is conducting human service activities related to or affected by COVID-19. Affected entities are those that have been closed or that have business activities that are hindered due to COVID-19 precautionary measures and/or illnesses. Affected entities will be asked to provide documentation to the respective ACF Program Office describing the effects, including how long the program and ACF-related work or instruction were and/or will be affected.

For continuation requests scheduled from April 1, 2020 to December 31, 2020 for projects with planned future support, ACF will accept a brief statement from recipients verifying that they are in a position to: 1) resume or restore project activities; and 2) accept a planned continuation award. ACF will post any specific instruction on their website at: https://www.acf.hhs.gov/coronavirus. ACF will examine the need to extend this approach on subsequent continuation award start dates as recipients have an opportunity to assess their situation.

ACF will allow the recipient to delay submission of any pending financial, performance, and other reports required for closeout of expired projects, provided that proper notice about the reporting delay is given to the agency. This delay may not exceed one year after the award expires.


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Principal Investigators (PIs) should work with their OSR Staff regarding any changes that may need to be made to a study's design and/or timeline. If it is determined that AHRQ prior approval or review is needed, formal requests should submit to the Grants Management Specialist named on the most recent NOA by your OSR C&G Officer. AHRQ does not waive the requirement for recipients to notify the agency of problems, delays, or adverse conditions related to COVID-19 on a grant-by-grant basis.

SOURCE: NOT-HS-20-010
Intake, follow-up, reassessment, or discharge data (GPRA/NOMS) may be collected telephonically or electronically.

Data (GPRA/NOMS) collection targets should not be changed as a result of the public health emergency. SAMHSA will review data with the lens of the current emergency situation.

Grant recipients should make every effort to safely collect data. SAMHSA understands there are challenges to collecting data during the public health emergency and will take into account the period of time in which there was an emergency, which prevented the collection of data.

If recipients are able to collect data but not in the timelines provided by SAMHSA, they should collect and submit the data to SAMHSA.

SOURCE: COVID-19 Information for SAMHSA Discretionary Grant Recipients
As this Public Health Emergency continues, recipients may identify additional cost-related flexibilities. NIH will consider requests on a case-by-case basis. Recipients should contact assigned grants management and program officials and provide detailed justification outlining the effect of COVID-19 and flexibility required.

SOURCE: NIH FAQs, NOT-OD-20-086, OMB M-20-17

*Office of the Assistant Secretary of Health/Grants Acquisition Management (OASH GAM) granted waivers until the public health emergency ends but no more than 90 days, for grants and cooperative agreements supported by:

- Office of Population Affairs (OPA)
- Office of Minority Health (OMH)
- Office of Women’s Health (OWH)
- Office of Research Integrity (ORI)
Impact to Research Funding

Office of Management and Budget

- M-20-21 MEMORANDUM TO THE HEADS OF EXECUTIVE DEPARTMENTS AND AGENCIES Subject: Implementation Guidance for Supplemental Funding Provided in Response to Coronavirus Disease 2019 (COVID-19)
- M-20-20 MEMORANDUM TO THE HEADS OF EXECUTIVE DEPARTMENTS AND AGENCIES Subject: Repurposing Existing Federal Financial Assistance Programs and Awards to Support the Emergency Response to the Novel Coronavirus (COVID-19)

*Note: These are from the OMB to the federal agencies, we a summary of agencies implementation is above in the Sponsor Guidance Section.

CDC

- Information for CDC Applicants and Recipients of CDC Funding
- Flexibilites Available to Applicants and Recipients of Federal Assistance Affected by COVID-19
- General Funding and Grants Frequently Asked Questions regarding COVID-19
- Interim Guidance for Administrators of US Institutions of Higher Education

DOE

- Accommodating Interruptions to Applicants Awardees Due to COVID-19

FDA

- FDA Guidance on Conduct of Clinical Trials of Medical Products during COVID-19 Pandemic

NASA
NIH (Notices from the Office of the Director are summarized in the Sponsor Guidance Section above)

- NOT-OD-21-026 Notice of Extended Guidance for Applicants Preparing Applications During the COVID-19 Pandemic
- NOT-NS-21-004 Notice of Temporary Extension of Eligibility for the BRAIN Initiative Diversity K99/R00 Career Transition Award During the COVID-19 Pandemic
- NOT-HD-20-030 Notice of Change to the Eligibility of Principal Investigators in PAR-20-042: NCMRR Early Career Research Award (R03 Clinical Trial Optional)
- NOT-DE-20-031 Notice of Temporary Extension of Eligibility for the NIDCR Dual Degree Dentist Scientist Pathway to Independence Award (K99/R00)
- NOT-AI-20-068 Notice to Extend Eligibility for Submission of NIAID K99/R00 Pathway to Independence Award Applications (and Physician Scientist K99/R00) due to COVID-related Disruptions
- NOT-AI-20-054 NIAID Late Application Policy for NIAID-Specific FOAs with Due Dates in July and August 2020
- NOT-HG-20-042 Clarifying late Application Policy Receipt Dates for NHGRI-Specific FOAs with Application Due Dates in May, June, and July and Rescinding NOT-HG-20-041
- NOT-CA-20-072 NCI Late Application Policy for NCI-specific RFAs with Application Due Date of June 24, 2020
- NOT-AI-20-053 NIAID Late Application Policy for NIAID-specific RFAs with Due Dates in June 2020
- NOT-HG-20-041 NHGRI Late Application Policy for NHGRI-specific ROAs with Application Due Dates in May, June, and July
- NOT-CA-20-069 Late Application Policy for June 17, 2020 Application Due Date of PAR-19-242, Paul Calabresi Career Development Award for Clinical Oncology (K12 Clinical Trial Optional) Due to Public Health Emergency for US Coronavirus Disease 2019
- NOT-HD-20-016 NICHD Late Application Policy for Institutional Training Grants to RFA-HD-21-014 Due to Public Health Emergency for United States Coronavirus Disease 2019 (COVID-19)
- NOT-AG-20-033 NIA Late Application Policy for NIA-Specific FOAs with Application Due Dates in May, June, and July 2020
- NOT-AI-20-048 NIAID Late Application Policy for Funding Opportunities RFA-AI-20-001 and RFA-AI-20-009
- NOT-GM-20-029 NIGMS Late Application Policy for NIGMS-Specific FOAs with Application Due Dates in May 2020
- NOT-OD-20-105 NIH Late Application Policy for Institutional Training Grants to PA-20-142 and PA-20-162 Due to Public Health Emergency for United States Coronavirus Disease 2019 (COVID-19)
- NIH Extramural Response to Natural Disaster and Other Emergencies
- Coronavirus Disease 2019 (COVID-19): Information for NIH Applicants and Recipients
• NOT-OD-20-083: General Frequently Asked Questions (FAQs) - Proposal Submission and Award Management Related to COVID-19
• NOT-OD-20-082: NIH Late Application Policy Due to Public Health Emergency for United States for 2019 Novel Coronavirus (COVID-19)
• NOT-OD-20-086: Flexibilities Available to Applicants and Recipients of Federal Financial Assistance Affected by COVID-19
• NOT-OD-20-087: Guidance for NIH-funded Clinical Trials and Human Subjects Affected by COVID-19
• Special OLAW Webinar on March 19: Pandemic Contingency Planning on its Impact on Animal Care
• NIH Message to Applicants and Recipients of NH Funds on Flexibilities Needed for COVID-19 (YouTube video)
• NOT-OD-20-088: Flexibilities for Assured Institutions for Activities of Institutional Animal Care and Use Committees (IACUCs) Due to COVID-19
• NOT-OD-20-091: UPDATE: NIH Late Application Policy Due to Public Health Emergency for United States for 2019 Novel Coronavirus (COVID-19)
• NIH NCI - Interim Guidance for Patients on Clinical Trials Supported by the NCI Cancer Therapy Evaluation Programs and the NCI Community Oncology Research Program (NCORP)

NSF (Guidance below are summarized in the Sponsor Guidance Section above)

- Coronavirus Information Homepage

HHS-OASH GAM - Office of the Assistant Secretary of Health, Grants Acquisition Management (Guidance below is summarized in the Sponsor Guidance Section above)

HHS Memo to Recipients of OASH Grants and Cooperative Agreements

Administration for Children & Families (ACF) Information Memorandum: IM-ACF-OA-2020-01 ACF grant flexibilities in conducting human service activities related to or affected by COVID-19.

AHRQ - Agency for Healthcare Research and Quality (Guidance below is summarized in the Sponsor Guidance Section above)

- NOT-HS-20-010

SAMHSA - Substance Abuse and Mental Health Services Administration (Guidance below is summarized in the Sponsor Guidance Section above)

- COVID-19 Information for SAMHSA Discretionary Grant Recipients

DOD - Office of the Under Secretary of Defense for Research & Engineering, Basic Research-Research Directorate (Guidance below is summarized in the Sponsor Guidance Section above)

- FAQs for DOD Research Proposers and Awardees Impacted by COVID-19
USAMRAA - United States Army Medical Research Acquisition Activity (Guidance below are summarized in the Sponsor Guidance Section above)

- USAMRAA Supplemental Guidance March 25, 2020
- Human Research Protection Office (HRPO) FAQs

Funding Opportunities related to COVID-19

Please notify your RSC of any intention to submit a proposal ASAP.

Additional Resources

UCSF Resources:

- UCSF Novel Coronavirus (COVID-19) Resources
- UCSF Guidance for Handling Financial Implications of COVID-19
- UCSF Controller's Office Guidance for Handling Financial Implications of COVID-19 on Sponsored Projects
- Interim UCSF Policy on Human Subjects-Related Research Visits at San Francisco Campuses
- UCSF IRB COVID-19 Resources

UC Resources:

- UC Federal Government Relations
- UC’s Employment and Leave Policy
- UC’s responses to coronavirus (COVID-19)
- UC Travel ? Coronavirus and Airline Cancellations/Waivers
- RPAC Coronavirus Page
- RPAC webpage listing Federal Agency Resources
- RPAC Daily Updates

Council on Governmental Relations (COGR) Resources:

- COGR Repository of Institutional and Agency Responses to COVID-19 and Additional Resources
- COGR's FAQs Regarding COVID-19's Impact on Federal Awards (V.1)
- COGR Outreach Letter to OMB
Other

- DHHS - HIPAA Privacy and Novel Coronavirus
  - Topics Covered:
    - Sharing Patient Information
    - Safeguarding Patient Information
    - HIPPA Applies Only to Covered Entities and Business Associates
    - Other Resources