

March 16, 2020

Summary of National Institutes of Health Guidance on COVID-19

The following notes briefly summarize critical elements of federal guidance on COVID-19 released by the NIH as of the date listed above. These notes are not meant to be all-inclusive and the reader is advised to visit the linked guidelines for a comprehensive view of additional information released by the NIH.

[I. NIH LATE APPLICATION POLICY Due to Public Health Emergency for United States for 2019 Novel Coronavirus \(COVID-19\) - Notice Number: NOT-OD-20-082 – 3/9/2020](#)

Late applications

When delays occur because the applicant or recipient organization is officially closed or unable to submit grant applications due to the effects of COVID-19, the NIH will consider accepting applications late, on a case-by-case basis, in accordance with the NIH Grants Policy Statement, [Section 2.3.9](#), under the following circumstances:

- Institutions must submit applications or reports as soon as possible after reopening or resuming operations so that grant applications can be submitted, not to exceed the number of days the institution was officially closed or unable to submit grant applications.
- Institutions must submit a cover letter with the applications with enough detail about the delay so that NIH staff can make a determination whether circumstances justify accepting the application late.
- Institutions need not request advance permission to submit late due to this declared emergency.

[II. General Frequently Asked Questions \(FAQs\) - Proposal Submission and Award Management Related to COVID-19 - Notice Number: NOT-OD-20-083 – 3/10/2020](#)

This Notice provides information and general questions associated with proposal submission and award management related to COVID-19.

Policy and Process on Reporting Delays (RPPRs, FFRs, invention, etc.)

- NIH understands that some reporting delays due to the impact of coronavirus may be unavoidable. Therefore, if recipients are unable to complete and submit a progress report ((Research Performance Progress Reports (RPPR)), Financial reports (Federal Financial Report expenditure data), and/or invention report by the scheduled due date, they should promptly contact the assigned grants management and/or program official. Although NIH will accept these late reports, grant awards will be delayed until the required reports are submitted and accepted by NIH.

Policy on Extensions to NIH Proposal Deadlines

- The NIH will consider accepting applications late, on a case-by-case basis.
- Recipients must submit a cover letter with the application, outlining the fact that the institution is closed due to affects of COVID19 so that NIH staff can document the delay.
- Recipients do not need to request advance permission to submit late due to a public health emergency-related delay.
- Recipients must submit applications or reports as soon as possible after reopening or end-of-quarantine, not to exceed the number of days the institution was officially closed or the key staff including but not limited to the PD/PI was quarantined.

III. Flexibilities Available to Applicants and Recipients of Federal Financial Assistance Affected by COVID-19 - Notice Number: NOT-OD-20-086 – 3/12/2020

- NIH has identified short-term administrative flexibilities to assist applicants with managing administrative, financial management and audit requirements under the Uniform Guidance “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards” without compromising their accountability requirements.

Extension of Post-Award Financial and Other Reporting

- If your institution is unable to complete and submit financial and Research Progress Performance Reports (RPPR) by the scheduled due date, due to the effects of COVID-19, please be sure to contact the assigned grants management and/or program official to let them know the reports will be late. NIH will accept these late reports but will delay issuing grant awards until the reports are received and accepted by the appropriate Institute or Center (IC).

Cost Related Flexibilities/Expenditure of Award Funds

Salaries:

- NIH understands that many researchers may be unable to work as a result of or related to the effects of COVID-19. If a recipient organization’s policy allows for the charging of salaries and benefits during periods when no work is performed due to the effect of COVID-19, regardless of the funding source, including Federal and non-Federal, then such charges to NIH grant awards will be allowable.
- *Reminder: NIH awarding Institutes/Centers (ICs) may request documentation to confirm the requirements of institutional policies.*

Stipends:

- Institutions affected by COVID-19 may continue to provide stipend payments to fellows and trainees who may be unable to work as a result of or related to COVID-19. Recipients should notify the assigned grants management official, and provide

documentation demonstrating the effect of COVID-19, and how long the institution will be affected.

Travel:

- Non-refundable costs associated with grant-related travel that has been cancelled due to COVID-19 may be charged to the NIH award if they would have otherwise been allowable.

Conference Registration Fees:

- Non-refundable registration fees for conferences, symposiums or seminars that have been cancelled due to COVID19 may be charged to the NIH award if they would have otherwise been allowable (e.g. necessary to accomplish program objectives).

As this Public Health Emergency continues, recipients may identify additional cost-related flexibilities that are needed. NIH will consider such requests on a case-by-case basis. Contact your assigned grants management specialist and program official to provide a detailed justification outlining the effect of COVID-19 and the flexibility required. NIH will consider such requests in line with the Federal cost principles, NIH policy, and need to support the project.

Extension of Closeout

- NIH will allow recipients that are affected by COVID-19 to delay submission of any final financial, performance, and other reports required by the terms and conditions of award for the closeout of expired projects, provided that proper notice about the reporting delay is given by the recipient to the agency. This delay may not exceed one year.

IV. Additional FAQs – COVID-19 Flexibilities for Applicants and Recipients

- COVID-19 declared public health emergency is considered an emergency situation under NIH policy.
- For information related to the specific circumstances of a grant award that is affected by COVID-19, recipients should contact the funding Institute of Center (IC) grants management official and program official named in their Notice of Award.
- Application review - NIH assures the applicant community that peer review will continue to take place.
- Recipients may charge pre-award costs to NIH supported grants dating back to January 20, 2020 through April 30, 2020 as outlined in the declaration of the public health emergency.

- Institutions affected by COVID-19 will be allowed to submit post-submission grant application materials to revise information that was submitted in an application as long as the materials are received at least fourteen days before the start of the review meeting. A letter of explanation (maximum of one page) is required.
- Can an institution affected by COVID-19 still apply to an FOA that has expired? Yes. The applicant institution should contact the [eRA service desk](#) at least 2 business days prior to your anticipated submission so they can coordinate any changes needed to allow systems to process your application.
- Travel costs - Non-refundable costs associated with grant-related travel that has been cancelled due to COVID-19 may be charged to the NIH award if they would have otherwise been allowable. If vouchers have been granted for any of the travel expenses affected by COVID-19, recipients are required to use the vouchers and may not request additional support. **Institutions must document that costs charged to a grant are non-refundable and maintain documentation, in accordance with record retention requirements, and make them available to NIH upon request.**
- Conference grants - Non-refundable costs associated with NIH supported meetings and conferences affected by COVID-19 are allowable and may be requested as an administrative supplement to the appropriate funding IC.
- Salary Charges - Charging salaries to NIH grants when no work is being performed is allowable if your organization's 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 you have such a policy, and anticipate a need to charge personnel costs, please notify the funding IC. NIH may request documentation to confirm the requirements of the institutional policy.
- NRSA (National Research Service Award) Trainees and Fellows - Stipend payments may continue to be charged to NIH NRSA grants affected by COVID-19. Recipients should notify the Grants Management Specialist named in the notice of award and provide documentation demonstrating the effect of COVID-19, and how long the institution will be affected.