

SMD FAQ on Grants and Research during the COVID-19 Epidemic

Document History	
March 31, 2020	First release (as version 4.4)
April 8, 2020	Answer to Question #10 modified slightly (in bold text) and Q&A #12 - 15 added

Below is a list of questions that NASA's Science Mission Directorate (SMD) has received from proposers and award recipients (both recipients of COVID-19-related awards and those with other types of SMD awards) affected by the COVID-19 epidemic. Please note that there is government-wide guidance in the OMB Memo M-20-17 (available [here](#)) and NASA Agency implementation of that OMB memo may be found at <https://www.nssc.nasa.gov/grants>. The OMB memo, and thus documents like this one that are based on it, are time-limited and will be reassessed on June 18, 2020.

1. May universities pay their soft-money researchers from NASA grants when the institutions are closed?

OMB Memo M-20-17 allows for paying soft-money researchers as well as graduate students, post-docs, and other laboratory staff during the COVID-19 epidemic — if the institution's own policies allow for it. The memo modifies 2 CFR §200.403*, 2 CFR §200.404, and 2 CFR §200.405 as follows:

Awarding agencies may allow recipients to continue to charge salaries and benefits to currently active Federal awards consistent with the recipients' policy of paying salaries (under unexpected or extraordinary circumstances) from all funding sources, Federal and non-Federal. Awarding agencies may allow other costs to be charged to Federal awards necessary to resume activities supported by the award, consistent with applicable Federal cost principles and the benefit to the project. Awarding agencies may also 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 progress reports and other communications with the grantee. Awarding agencies must require recipients 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.

SMD will take advantage of this modification to the CFR and will concur with the Grant Officer at the NASA Shared Services Center (NSSC) in allowing grant recipient institutions to continue to charge salaries and benefits to currently active grants in accordance with the policies of the recipient organization.

2. Will award increments and renewals continue when work hasn't been able to proceed? No Cost Extensions (NCEs) may not allow employees to be paid and maintain

* 2 CFR §200.403 = Title 2 of the Code of Federal Regulations, section 200.403

laboratory capability during closures. How will SMD view grant budget increases when work hasn't been able to proceed?

As in the response to #1 (above), OMB Memo M-20-17 allows for institutions to charge restart costs to their grants:

Awarding agencies may allow recipients to continue to charge salaries and benefits to currently active Federal awards consistent with the recipients' policy of paying salaries (under unexpected or extraordinary circumstances) from all funding sources, Federal and non-Federal. Awarding agencies may allow other costs to be charged to Federal awards necessary to resume activities supported by the award, consistent with applicable Federal cost principles and the benefit to the project. Awarding agencies may also 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 progress reports and other communications with the grantee. Awarding agencies must require recipients 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.

Assuming sufficient funding is available, SMD will make use of this modification to the CFR to allow other costs associated with resuming funded grant activities to be charged to currently active grants. Award recipients must not assume, though, that NASA will be able to provide additional funding to cover funding losses associated with the COVID-19 crisis. Any policy on grant augmentations will not be issued until the impacts of the pandemic are better understood. SMD is working internally as well as with our federal partners on proposal and award-related issues pertaining to COVID-19. SMD will communicate with the awardee community about these issues and will provide guidance as further information becomes available. In the meantime, please continue to follow all relevant policies and procedures, including those of your organization, and apply those practices consistently.

3. Will funds not yet released for award renewals be impacted?

Staff at the NASA Shared Services Center (NSSC) routinely work remotely, so no interruption of grant processing is anticipated at this time.

4. My lab has purchased Personal Protective Equipment (PPE) using funds from my current grant. Is it allowable for me to donate them to my local first responders? What about grants that have already expired and gone through award closeout?

Donating Personal Protective Equipment (PPE) purchased with NASA grant funding to first responders is allowed under grants directly related to the COVID-19 emergency response and grants not related to the COVID-19 response on a case-by-case basis. However, the recipient should not assume that additional funds are available should the costs of donating the equipment result in a shortage of funding or supplies at a later date. Additionally, before

donating the PPE, award recipients must first notify and obtain approval from their cognizant NASA program officer. The recipient must also document and maintain records on all PPE donated to local first responders in response to the COVID-19 crisis.

5. My lab has purchased viral DNA isolation kits using funds from my grant. Is it allowable for me to donate them to my local first responders? What about grants that have already expired and gone through award closeout?

Donating viral DNA isolation kits purchased with NASA grant funding to first responders is allowed under grants directly related to the COVID-19 emergency response and grants not related to the COVID-19 response on a case-by-case basis. However, the recipient should not assume that additional funds are available should the costs of donating the equipment result in a shortage of funding or supplies at a later date. Additionally, before donating the viral DNA isolation kits, award recipients must first notify and obtain approval from their cognizant NASA program officer. The recipient must also document and maintain records on all viral DNA isolation kits donated to local first responders in response to the COVID-19 crisis.

6. What does "apply SMD's late proposal policy leniently on a case-by-case basis" mean?

OMB Memo M-20-17 amends Federal Grant regulation (2 CFR §200.202) on late proposals: Awarding agencies may provide flexibility with regard to the submission of competing applications in response to specific announcements, as well as unsolicited applications. As appropriate, agencies should list specific guidance on their websites and/or provide a point of contact for an agency program official.

SMD's policy on late proposals (SPD-02) will be applied in the context of this change. Proposals submitted after the due date because of the impacts of the COVID-19 epidemic will be strongly considered for acceptance if they are submitted within seven calendar days of the due date. This is a temporary extension of SMD policy ("Allowances for Technical Problems" found in SPD-02) regarding delayed proposal submissions due to acts of Nature. Proposals submitted more than seven calendar days after the due date will only be accepted after an analysis of the particular reasons for the late start/late submission by the program element point of contact and with the agreement of the selecting official.

SMD intends to make use of this mechanism sparingly by preemptively moving due dates to better allow proposers and their institutions to acclimate to their new work conditions.

7. Can fringe benefits policies be amended to incorporate emergency paid leave for staff retention purposes?

Award recipients are authorized to continue to charge salaries and benefits to currently active Federal awards consistent with the recipient organization's policy of paying salaries (under unexpected or extraordinary circumstances) from all funding sources, Federal and non-Federal. The recipient must also document and maintain records to substantiate the charging

of any salaries and other project activities costs related to interruption of operations or services.

8. Is there a limitation on when salaries and benefits should charge to an award?

OMB Memo M-20-17 offers relief to recipients without any limitation. If salaries and benefits are budgeted items of an award, then anyone performing activities under that award would be allowed to charge their salary and benefits to the award as long as there is funding available and as long as it is consistent with the entity's policy for paying salaries. The recipient must also document and maintain records to substantiate the charging of any salaries and other project activities costs related to interruption of operations or services.

9. Does NASA plan to address changes to Indirect Cost rates that may have occurred because of increased costs in certain activities?

No, 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. Agencies may approve grantee requests for an extension on the use of the current rates for one additional year without submission of an indirect cost proposal. Agencies may also approve grantee requests for an extension of the indirect cost rate proposal submission to finalize the current rates and establish future rates.

10. How will the COVID-19 epidemic impact proposal due dates and selections?

SMD has already begun shifting proposal due dates for some near-term solicitations. As the epidemic continues, SMD will routinely reassess whether other due dates need to be shifted and if any do, ROSES-2020 will be amended as usual. Changes to due dates will be announced through the NSPIRES email lists, **Google calendars (click [here](#) for instructions), and the SARA [ROSES-2020 Blog](#), as always.**

SMD will conduct all review panels virtually through at least the end of May. It is expected that due to the reduced discussion-time available for panels whose members are spread across multiple time zones, review panel meetings may take longer than in the past. This will, necessarily, make selection dates later in the year than normal. SMD will endeavor to reduce these delays as much as is practical but some increase in the time-to-award is likely to happen. As SMD gains experience with virtual panels, estimates of the delay in making selections will be refined and this FAQ updated.

11. What is NASA's guidance for entities whose System for Award Management (SAM) registration have expired or set to expired in 60 days?

Current registrants in the System for Award Management (SAM) with active registrations expiring between March 19 and May 17, 2020, will be automatically afforded a one-time extension of 60 days. The General Services Administration (GSA) has initiated 60-day extensions to SAM.gov registrations that have expiration dates within this range, and it will take the GSA until March 28, 2020 to complete all extensions. This effort is intended as relief for those otherwise required to re-register during that period.

GSA anticipates 61,298 registrations will be impacted by these extensions and plans to process the extension under the following timeline:

Date	Action
3/18/2020	Registrations expiring on 3/19/2020 extended to 5/17/2020.
3/19/2020	Registrations expiring from 3/20/2020 to 3/23/2020 extended by 60 days.
3/23/2020 to 3/27/2020	Registrations expiring from 3/24/2020 to 5/17/2020 extended 60 days. Extensions will be processed at a rate of about twelve thousand per day.
3/28/2020	Actions Complete

12. We have NASA-funded people who cannot access laboratory facilities at or outside NASA. Reading through the COVID FAQ on SARA, it appears to allow PIs to continue to charge their salaries but under what circumstances may salaries be charged?

See question/answer number 8. (1) The awarded institution must have a policy, applicable to all federal and non-federal funding sources, that allows for such continuing charges under unexpected or extraordinary circumstances.

(2) The agency (NASA) gives its approval.

(3) The grantee documents and retains documents that substantiate the charging of any salaries and other project activities costs related to interruption of operations or services

13. These FAQs mention the "Agency" and also the Grant Officer at NSSC. To whom should requests for charging salaries, etc. be made? Who should be copied?

The AORs (authorized organization representative) and PIs should email both the Program Officer and the NSSC. Only the Grants Officer (at the NSSC) may obligate the government and the official NASA records are stored by the NSSC, but the Program Officer needs to be in the loop. Furthermore, NASA can't guarantee that additional funding will be available once the response to the COVID-19 epidemic is over. See also the NASA implementation memo of the OMB 2 CFR 200 guidance on the NSSC site at:

https://searchpub.nssc.nasa.gov/servlet/sm.web.Fetch/NASA_s_Implementation_of_M-20-17_COVID-19.pdf?rhid=1000&did=6440077&type=released

14. We may be late with our progress reports.

Refer to other FAQ "Recipients may submit financial, performance, and other reports up to three (3) months beyond the normal due date. If recipients expect that they will not be able to meet a normal report due date, they must notify their cognizant program office and Grant Officer and note when within the three (3) month extension window they will submit their report(s). Recipients must continue to notify their cognizant program office and Grant Officer of any problems, delays, or adverse conditions which will materially impair the ability to meet the objective of the award per 2 CFR § 200.328(d)(1). Please note that the NSSC will continue to issue automatic report deadline reminders based on standard reporting

due date; if a recipient notifies their Grant Officer that they need a report deadline extension per the above guidance, then these automatic report reminders may be disregarded"

15. Does the relief identified in the [OMB Memo \(M-20-17, "Administrative Relief for Recipients and Applicants of Federal Financial Assistance Directly Impacted by the Novel Coronavirus \(COVID-19\) due to Loss of Operations"\)](#), like continuing to pay staff, in #1, above, flow down to FAR (Federal Acquisition Regulation) based subawards associated with a grant or cooperative agreement (e.g., a subcontract)? Did OMB and or NASA Issue guidance about FAR (Federal Acquisition Regulation) based awards?

No, M-20-17 is silent on whether the relief flows down to FAR-based awards, so NASA does not assume OMB's administrative relief applies to FAR-based awards. Visit OMB's March 31, 2020 [Recording](#) and [Presentation](#) "Administrative Relief for Recipients and Applicants Impacted by the Novel Coronavirus and Implementation of The GREAT Act".

OMB plans to reassess M-20-17 applicability within 90 days. OMB issued, brief separate guidance for FAR-based awards: "[Managing Federal Contract Performance Issues Associated with the Novel Coronavirus \(COVID-19\)](#)" M-20-18" that does not mention grants. Please email your FAR versus Grant Relief questions to: GrantsTeam@omb.eop.gov.

If you are a NASA contractor, you should be in contact with your CO who will have or can get guidance from NASA's procurement office. NASA uses Procurement Information Circulars (PIC) for dissemination of procurement related information not suitable for inclusion in the NASA FAR Supplement ([NFS](#)). Refer to the official NFS for the latest procurement policy. See also [PIC 20-01 entitled "Emergency Acquisition Flexibilities for Novel Coronavirus Disease 2019 \(COVID-19\)"](#) Current POC: Andrew O'Rourke, andrew.orourke@nasa.gov. Expiration date: July 1, 2020.

This document was downloaded from the "SARA" [Library](#). Questions regarding this FAQ may be directed to Michael New at michael.h.new@nasa.gov and cc SARA@nasa.gov.