



United States
Department of
Agriculture

National Institute
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Overview of USDA NIFA Implementation of Policies Related to COVID-19 and Frequently Asked Questions April 2020

USDA NIFA

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Background

- Consistent with federal government agencies across the United States in the face of the new and unique challenges in confronting the COVID-19 epidemic, **USDA NIFA is prioritizing the health and safety of the research community.**
- USDA NIFA understands the effects this challenge will have on USDA NIFA-funded research and facilities, and we are committed to providing the **greatest flexibilities to support the health and safety of applicants, grantees and employees.**

Background (cont.)

- USDA NIFA is **continually updating guidance and our online resources**, to keep staff and partners informed, including providing updates to
 - deadline extensions and
 - frequently asked questions.
- USDA NIFA is also **accepting proposals for certain important research and activities** related to coronavirus.
- The latest information is available on our website at:
<https://nifa.usda.gov/coronavirus>

Relevant OMB Guidance Documents

- OMB Memorandum M-20-11 – “Administrative Relief for Recipients and Applicants of Federal Financial Assistance Directly Impacted by the Novel Coronavirus (COVID-19)”
- OMB Memorandum 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” dated March 19, 2020
- OMB Memorandum M-20-20 – “Repurposing Existing Federal Financial Assistance Programs and Awards to Support the Emergency Response to the Novel Coronavirus (COVID-19)”

Time Limitations

- The administrative relief flexibilities in M-20-17 are time limited.
- OMB plans **to reassess their applicability within 90 days**
 - USDA NIFA will update our guidance, as needed, at that time.



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POLICY, PROCEDURES & FAQs

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

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

Do applicants for NIFA grants need a current SAM registration when they apply?

- The requirement for System for Award Management (SAM) registration at time of application may be temporarily waived by the NIFA NPL for any applications received beginning March 19, 2020 until the authority under OMB memo M-20-17 expires.
- However, a valid SAM registration **must** be in place at time of award, consistent with the requirements of 2 CFR § 200.205, *Federal awarding agency review of risk posed by applicants*.

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

- USDA NIFA has extended the deadline dates for specific funding opportunities. A list of these extensions is available at <https://nifa.usda.gov/announcement/nifa-deadline-extensions-due-covid-19>.

2. Flexibility with application deadlines (cont.)

- If the application is delayed for a valid extenuating circumstance, the applicant should let the program contact listed in the RFA know about the delay and submit all the required documentation after the application has been submitted to USDA NIFA.
- USDA NIFA will consider the request at that time based on the information provided.
- USDA NIFA's policies for accepting late applications are available at <https://nifa.usda.gov/resource/late-application-consideration>.

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

- USDA NIFA will take advantage of this flexibility as needed for emergency publication of NOFOs and in accordance with the requirements in [M-20-17](#).

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

- For competitive grants, recipients are generally allowed no-cost extensions of **up to 12 months** without prior approval.
 - must follow standard policies and procedures specified in the terms and conditions of their USDA NIFA grant with regard to these no-cost extensions.

4. No-cost extensions on expiring awards (cont.)

Non-Competitive Capacity

- Due to potential impacts from social distancing, USDA NIFA will also allow no-cost extensions for non-competitive capacity grants expiring September 30, 2020 with a remaining balance.
- **Five-year** grants will be allowed a **6 month extension**, and **two-year** grants will be allowed a **1 year extension**.

4. No-cost extensions on expiring awards (cont.)

Non-Competitive Capacity

- The period of performance will be extended accordingly. Recipients with grants in this disposition will be **notified in early August 2020** with a list of grants eligible for this no-cost extension and will be provided instructions on how to submit the request with a **deadline of September 1, 2020 for response.** 14

5. Abbreviated non-competitive continuation requests. (2 CFR § 200.308)

- For continuation requests scheduled to come in from April 1, 2020 to December 31, 2020, from competitive award projects with planned future support, USDA NIFA will accept a brief, written statement from recipients to verify that they are in a position to:
 - 1) resume or restore their project activities; and
 - 2) accept a planned continuation award.

5. Abbreviated non-competitive continuation requests. (cont.)

- The recipient must follow all other continuation related requirements described in the award terms and conditions.
- USDA NIFA will examine any future need to extend this approach on subsequent continuation award start dates as recipients have an opportunity to assess the situation.

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

- Recipients are authorized to continue to charge salaries, stipends, and benefits to currently active USDA NIFA awards
 - consistent with the recipients' policy of paying salaries (under unexpected or extraordinary circumstances) from all funding sources, Federal and non-Federal.

6. Allowability of salaries and other project activities (cont.)

- In general, recipients should utilize the salaries, stipends, and benefits rates and staffing levels in place on March 1, 2020 when President Trump proclaimed that the COVID-19 outbreak in the United States constituted a national emergency.

6. Allowability of salaries and other project activities (cont.)

- The recipient also is authorized to charge other costs to USDA NIFA 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.

6. Allowability of salaries and other project activities (cont.)

- If a recipient faces challenges to meet the program objectives of the award, they should contact the National Program Leader in the final year of the award and evaluate how to proceed with the work.

6. Allowability of salaries and other project activities (cont.)

- To discuss any concerns related to
 - salaries, stipends, and benefits rates and staffing levels,
 - anticipated shortfalls or other administrative options, which may include no-cost extensions and change in scope,
 - please contact NIFA at awards@usda.gov to consult with a grants specialist about the organization's specific circumstances.`

6. Allowability of salaries and other project activities (cont.)

- NIFA 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.

6. Allowability of salaries and other project activities (cont.)

- 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.

Can NIFA grant recipients use funds under their NIFA grant to pay Hazard Pay?

- Hazard pay may be paid consistent with the grantee organization's policies, state and federal laws.
- Federal employees must follow the policies of their employing agency.
- Recipients must not assume that supplemental funding will be available should the charging of such pay result in a shortage of funds to eventually carry out the project.

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

- Recipients who incur costs related to the cancellation of events, travel, or other activities necessary and reasonable for the performance of the award, or the pausing and restarting of grant funded activities due to the public health emergency, are authorized to charge these costs to their award
 - without regard to 2 CFR § 200.403, Factors affecting allowability of costs, 2 CFR § 200.404, Reasonable costs, and 2 CFR § 200.405, Allocable costs.



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7. Allowability of Costs not Normally Chargeable to Awards (cont.)

- Recipients may charge the full cost to the award when the event, travel, or other activities are 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.



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7. Allowability of Costs not Normally Chargeable to Awards (cont.)

- 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.



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7. Allowability of Costs not Normally Chargeable to Awards (cont.)

- If a shortfall is anticipated, recipients must contact USDA NIFA's Awards Management Division to discuss the situation at
 - awards@usda.gov for competitive grants or
 - capacitygrantquestions@usda.gov for capacity grants.

What do we do with conference grants and conferences already scheduled?

- If your conference needs to be delayed, please check your award Terms and Conditions for information on how to request a No-Cost Extension (NCE).

If my organization cancels an approved conference due to the impacts of COVID-19, are the costs incurred allowable costs under our award?

- Yes. If your organization is rescheduling the conference due to the impacts of COVID-19, **and**
 - your organization later holds the conference, whether in person or virtually, during the award period of performance, **and**
 - the costs were otherwise allowable costs prior to cancellation, **and**
 - your organization took mitigation steps to reduce any financial loss of award funds,
 - then NIFA will allow the associated costs.

Other Notes On Cancelled/Rescheduled Conferences

- Please note the balance of award funds may not be increased by the amount of funds expended on cancelled conference costs.
- Your institution will need to provide a justification, which addresses the elements mentioned above, to NIFA's Awards Management Division (AMD) awards@usda.gov .
- Unfortunately, losses by persons or activities not directly funded under the award are not covered, such as attendee airline change fees or increases in their later airline ticket purchases.

If the project cannot be completed in original duration or budget, what are my options?

- If a recipient faces challenges to meet the award program objectives, they should contact the National Program Leader in the final year of the award and evaluate how to proceed with the work.
- Besides administrative options, supplemental funding requests may be considered depending on the justification. Email awards@usda.gov to discuss:
 - the allowability of salaries (including staffing fluctuation), stipends, and benefits and/or
 - administrative options, which may include No-Cost Extensions and change in scope

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

- Recipients are required to obtain the prior approvals specified in 2 CFR § 200.308 (c) (i-viii) which must be submitted via awards@usda.gov for competitive grants and for capacity grants via capacityequipment@usda.gov.
- USDA NIFA will review its agency-specific prior approval requirements and notify grantees if decisions are made to temporarily waive any of these requirements.

8. Prior approval requirement waivers (cont.)

- Recipients are reminded that they are to ensure that all costs charged to Federal awards must be consistent with Federal cost policy guidelines and the terms and conditions of the award, except as specified in this guidance.

9. Exemption of certain procurement requirements.

(2 CFR § 200.319, 2 CFR § 200.321)

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

10. Extension of financial, performance, and other reporting.

(2 CFR § 200.327, 2 CPR § 200.328)

- USDA NIFA will allow grantees to delay submission of financial, performance and other reports **up to 90 days beyond the normal due date.**
- Grantees may continue to draw down Federal funds from ASAP without the timely submission of these reports.
- However, these reports must be submitted at the end of the postponed period.

10. Extension of financial, performance, and other reporting. (cont.)

- In addition, USDA NIFA may waive the requirement for recipients to notify the agency of problems, delays or adverse conditions related to COVID-19 (200 CFR 200.328(d)(I) during the effective period of the M-20-17.

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

- Recipients may continue to use the currently approved indirect cost rates (i.e., predetermined, fixed, or provisional rates) to recover their indirect costs on Federal awards.
- Recipients may request an extension on the use of the current rates for one additional year without submission of an indirect cost proposal.

11. Extension of currently approved indirect cost rates (cont.)

- Recipients also may submit a request to their cognizant agency for an extension of the indirect cost rate proposal submission to finalize the current rates and establish future rates.
- Visit <https://nifa.usda.gov/indirect-costs> for more information on USDA NIFA indirect costs.

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

- USDA NIFA has automatically extended the due date for submission of all final project reports, financial reports, and Project Outcomes Reports due between March 1 and April 30, 2020, by **90 days**.
- Recipients are reminded that USDA NIFA cannot make any new award or supplement any existing award if the PI or any co-PI(s) has an overdue final report; therefore, it is vital that final reports be submitted by the revised due date.

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

- Recipients and subrecipients that have not yet filed their single audits with the Federal Audit Clearinghouse as of the date of the issuance of the OMB Memorandum that have fiscal year-ends through June 30, 2020, are authorized
 - to delay the completion and submission of the Single Audit reporting package, as required under Subpart F of 2 CFR § 200.501 – *Audit Requirements*, to **six (6) months** beyond the normal due date.

13. Extension of Single Audit submission (cont.)

- **No formal approval for this extension is required;** however, recipients and subrecipients must maintain documentation of the reason for the delayed filing.
- Recipients and subrecipients who currently qualify as a “low-risk auditee” under the criteria of 2 CFR § 200.520(a), and who take advantage of this extension will continue to qualify as a “low-risk auditee”, absent other reasons for a change in qualification.
- **Recipients should contact their cognizant agency for audit with any questions related to single audit.** For USDA NIFA single audit questions, please email policy@usda.gov.



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Other Frequently Asked Questions

I have a project with relevance to COVID-19, where can I submit it?

- Certain NIFA programs will allow submission of COVID-19 relevant projects outside of their normal deadlines, including
 - AFRI
 - SBIR
- Please visit <https://nifa.usda.gov/coronavirus> for additional information.

Are there any flexibilities to allow donation of PPE or use of staff or equipment funded through NIFA grants to produce PPE?

- Yes, recipients may donate PPE and other lab supplies in support of efforts related to COVID-19, or use staff or equipment funded through NIFA grants to produce PPE.
- Recipients may re-budget grant funds to repurchase supplies at a later date, or use unobligated balances.
- 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.

PPE Documentation Requirements

- Recipients are required to maintain appropriate records and cost documentation for any donated supplies, as required by 2 CFR § 200.302 – Financial management and 2 CFR § 200.333 - Retention requirement of records, and to substantiate the charging of any salaries and other project activities costs related to interruption of operations or services.

Do the flexibilities provided by OMB-20-17 and associated NIFA policy apply to subrecipients?

- NIFA encourages recipients to flow down these same flexibilities to subrecipients.

What are my options if the COVID-19 emergency does not allow me to complete the project?

- The project directors can contact the NIFA National Program Leader assigned to the project during the last year of the project to discuss various options, including:
 - adjusting the project scope, giving a No-Cost Extension, and providing supplemental funding for completing the project.
- Since these options are needed towards the end of a project, additional information about this topic will be provided at a later date.

Classes are cancelled, how do I complete the grant program requirements (my grant requires classroom instruction)?

- If a recipient faces challenges to meet the program objectives of the award due to class cancellations that directly impact the completion of your grant objectives, they should contact the National Program Leader to discuss and evaluate how to proceed with the work.
- Other options may include, but are not limited to, no-cost extensions, change in scope, and termination.



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Can FY 2020 proposals include study abroad programs, which include sending students abroad in 2021?

- Yes.

Our NIFA award includes study abroad program in summer 2020. Can that be postponed to 2021?

- Yes, if the grant is active in summer 2021. We are currently developing policies related to Fiscal Year 2020 students studying abroad. Other options may include, but are not limited to, No-Cost Extensions, change in scope, and termination.

Is NIFA still conducting civil rights compliance reviews?

- NIFA Equal Opportunity staff is still committed to civil rights compliance during this time.
- We are extending deadlines for grantees to provide us with compliance documentation for open compliance reviews.
- For new reviews, NIFA will utilize technology and desk reviews to respect social distancing requirements.
- NIFA Equal Opportunity staff is also providing technical assistance remotely and planning webinars to assist our partners in understanding their civil rights obligations.

Can Pandemic EBT (P-EBT) or Disaster SNAP (D-SNAP) benefits be counted as SNAP benefits for the purposes of earning a GusNIP incentive?

- Yes, P-EBT and D-SNAP are considered SNAP benefits.
- Households can earn GusNIP incentives when they make qualifying purchases using P-EBT or D-SNAP benefits.

Can a GusNIP grantee re-allocate fruit and vegetable incentives from one site to another site to better assist particularly food insecure populations who are being affected by COVID-19?

- Yes, this would be considered a program change and should be reported to USDA NIFA as required in the GusNIP RFA.
- Recipients should follow CDC guidelines to reduce potential of COVID-19 transmission to any vulnerable populations.



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Have ASAP operations been adversely affected during this period of social distancing?

- No.
- As always, if you have any ASAP questions that need to be addressed to NIFA, please contact ASAPCustomerService@usda.gov

NIFA Coronavirus Website

- <https://nifa.usda.gov/coronavirus>
 - **NIFA Press Releases and Announcements:**
 - [NIFA Frequently Asked Questions](#)
 - [NIFA Email Newsletter Update](#)
 - [NIFA Deadline Extensions Due to COVID-19](#)
 - **USDA Messages**
 - **USDA Resources**
 - **External Resources**



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Questions?

- **Submit any additional questions related to COVID-19 to awards@usda.gov to consult with a grants specialist.**