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FREQUENTLY ASKED QUESTIONS REGARDING THE IMPACT OF COVID-19 ON SPECIAL PROJECTS

OSPA continues to closely follow the COVID-19 outbreak as it relates to sponsored projects. These FAQs contain information about COVID-19 as it relates to the conduct of research and sponsored projects. Many were modified from the information prepared by the Council on Government Relations.

Campus Access Restrictions

On March 20, 2020, University leadership issued a memo indicating only employees who perform required functions for on-campus operations will be physically working on campus. These include but are not limited to people who support students in dining and residence halls, employees in health care and public safety, employees required to maintain the research labs and farms and others. OSPA staff are working remotely and current operations are functional.

Proposal Submission, Delays, or Missed Deadlines

1. **Will OSPA be able to review and submit my proposal?**

   OSPA staff will continue to provide current services and is able to submit proposals, even if personnel are working remotely. 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.

2. **If I have a proposal due and my institution closes, will the awarding agency still accept my application?**

   Most federal agencies, including NIH and NSF, do not grant prior approval for late submissions; however, there are existing policies that address extenuating circumstances.

   Per NIH: "A primary concern of NIH applicants is how to handle when an institution is closed due to natural disaster or other emergency situations. In these cases it is not necessary to get permission in advance for delays in grant application submissions. Instead, applications submitted late must include a cover letter indicating the reasons for the delay. The delay should not exceed the time period that the applicant organization is closed. Although NIH will often issue a Guide Notice reminding applicants of this policy during times of major emergencies, this policy will also apply to emergencies of a more limited or local nature not discussed in a separate NIH Guide Notice."

   Per NSF: Researchers or sponsored projects office staff from organizations that have been affected and are unable to meet stated NSF deadlines should contact the cognizant NSF program office to discuss the issue. NSF will consider extensions to the submission deadline on a case-by-case basis (and, in a few cases, on a program-by-program basis),

understanding that it may be particularly difficult for individuals impacted to contact NSF. See NSF PAPPG Chapter I.F for additional information on procedures for submitting such requests.

As the University is not closed but rather operations are being handled remotely, OSPA is not yet sure how the federal agencies will interpret late submission guidance. We strongly encourage you to discuss your specific situation with both your agency Program Official and OSPA.

Research Compliance

1. Will protocols continue to be reviewed by IACUC?

   IACUC protocol review will continue as usual until further notice. Contact IACUC@siu.edu with any questions or concerns.

2. Will Human subject protocols continue to be reviewed by the IRB?

   Human Subject protocol review will continue as usual until further notice. Contact siuhsc@siu.edu with any questions or concerns.

3. IACUC is not able to process my protocol. May I proceed anyway?

   In general, no, the activities covered under the protocol may not begin or continue, except as needed to safeguard the lives of the animals. Please immediately contact IACUC if this is an issue. Even if the institutional committees are not able to meet, IACUC has released guidance on how best to handle emergency situations and that guidance should be followed.

4. What is the contingency plan for research animal care?

   Lab Animal Program services are considered essential and appropriate staff will be expected to come in to care for the animals.

5. May I shift in person participant visits to be conducted through electronic means such as telehealth or telephone?

   The IRB should be consulted before changes to your research plan are implemented.

6. The IRB is not able to process my protocol or protocol continuation. May I proceed anyway?

   In general, no, the activities covered under the protocol may not begin or continue, except as needed to safeguard the lives of the human subjects. Please immediately contact siuhsc@siu.edu if this is an issue.

7. I have lab animals that need to be cared for and am concerned that staff may not be available to care for the animals or have the access they need to facilities if my institution closes.

   The University is required to have animal care emergency plans in place as a condition to a federal award involving animal research. Consult IACUC for questions about caring for your animals.

Allowable Costs/Charges on Sponsored Projects

1. I'm a PI working remotely from home during self-isolation. Can my effort still be charged to the grant?

   In general, yes, provided you remain engaged in your project. Current NIH and NSF prior approval requirements regarding disengagement and effort reductions remain in effect.

2. What if I am home sick and can't work on my project? Can my salary still be charged to the grant?

   Pursuant to SIUC's indirect cost rate agreement with the federal government, sick leave and other paid absences that are permitted under University policy may be charged to the grant.

3. If schools or elder-care facilities close, can award-funded employees stay at home to do child-care and elder-care and still charge their salary to a grant?

   If an award funded employee stays home due to a school or facility closure for child or elder care needs, the employee's salary would be charged in accordance with the University's HR policy.

Travel Cancellation Costs

1. I was planning to travel to a conference to present my research work supported by my grant, but the conference was cancelled due to precautions regarding COVID-19. May I still charge the travel-related costs to the grant?

   Generally travel costs that fit this category may be charged to the grant supporting this activity. In doing so it is reasonable to assume that you have requested and been denied a refund, and that you have documentation of your request. Document all transactions related to cancellations fees, refunds, etc. if you would like to charge your grant. OSPA staff will assist you in determining if the costs may be charged.

2. How should credits or refunds from cancelled travel costs be handled on sponsored projects?

   If a traveler has charged travel costs such as an airline ticket to a sponsored project, and that trip is later cancelled, the credit must post to the sponsored project account.

3. I am scheduled to host a conference paid by my grant. I have already incurred expenses associated with the conference prior to the conference being cancelled. Can I charge any conference expenses incurred to date to my award?

   If the conference was cancelled due to travel restrictions or safety concerns related to COVID-19 you should inform the sponsor. NIH issued guidance which indicates non-refundable costs associated with NIH supported meetings and conferences affected by COVID-19 are allowable and may be requested as an administrative supplement. Other sponsor cancellation fees will be handled in accordance with additional guidance as it is provided.

Project Progress Issues

1. What happens if the deliverables in my scope of work timeline cannot be met due to a slow down or gap in activities or if staff may need to work from home?

   Clearly COVID-19 is an extraordinary circumstance. If the scope of work demands a precise schedule in order to make an experiment viable, and the investigator cannot meet the schedule, they should contact the sponsor immediately. Note that this applies to financial assistance awards; contracts requiring deliverables by a certain date may need to invoke their Force Majeure clause. If you are experiencing this issue on a contract, contact OSPA at ospa@siu.edu for assistance.

2. Will agencies consider longer no cost time extensions if needed to finish a project after disruption?

   Researchers should document the actual impact of COVID-19 on the progress of their grants to provide substantiation for any future no cost time extension request. It is not known at this time if agencies will consider longer-than-normal no cost time extensions, or multiple no-cost time extensions, in this situation. If not already exercised, OSPA has the authority to grant a first no-cost time extension up to 12 months in duration for most federal research grants.

3. I have a progress report due in the near future and my study has been impacted by my limited access due to COVID-19 preparations. Should I include info related to this in my progress report?

   Yes. If your study is impacted, this should be included in your progress report (i.e., in Section F.2 of a NIH RPPR). Contact ospa@siu.edu is assistance in determining about

what information should be included and where this should be located in your project report.

4. I can't get to my research site and my research will be severely impacted. Will the sponsor provide incremental funding and/or additional time so that I can successfully complete the aims of the award?

   We expect federal agencies will recognize the difficulties inherent in this situation and work with institutions to facilitate the conduct of the project. As a reminder, recipients are required to (1) inform their program officer and grants officer if the need arises for additional Federal funds to complete the project (200.308.(c)(1)) and (2) federal agency notification is required as soon as "problems, delays, or adverse conditions which will materially impact the ability to meet the objective of the Federal award"(200.328.(d)(1)) is known.

   In the latter case, the notification must include a statement of the action taken or contemplated and any assistance needed to resolve the situation. It is possible that there will not be an answer yet on what is needed to resolve the situation; in that case, recipients should simply indicate that they will report back when more is known. If you find yourself in this situation, please contact OSPA immediately.

5. My study may be impacted by the "stay at home" order, which could lead to delays in completing my study by the end of the project period. What should I do?

   Most federal sponsors allow for a one-time no cost extension for up to 12 months at the end of the project. Please discuss your specific project with OSPA, who will provide guidance on the options available to you.

6. What happens if government employees are unavailable to perform their duties (e.g., issue prior approvals or process awards, amendments, issue payments?

   We expect that funding agencies will put out guidance in the event these circumstances become likely. Contact OSPA if you experience this issue prior to agency guidance being released.

7. What policy guidance has NIH issued about potential effects on pending and active funding?

   The NIH released Notice NOT-OD-20-086 on March 12, 2020 to alert the research community of administrative flexibilities that apply to NIH applicants and recipients. The flexibilities address, pre-award costs, extension of required reporting, prior approval waivers, and expenditure of award funds (i.e., stipends, travel, conference expense).

Remote work and access to research data

1. If a student or a researcher needs to access a data set from home in order to keep working on a project, how do we address privacy requirements, if the data set contains sensitive or private information?

   If the researcher cannot obtain secure access to the data set (e.g., remote access via VPN or other means), then the data set should not be accessed. Researchers should work with IT staff to explore whether a secure remote access option is viable for their project. If unsuccessful, researchers should document the amount of time they were unable to work on the data set for the purpose of any subsequent request for a no cost time extension.

General Information

1. For all of the above, are the answers any different by sponsor?

   Yes, they can be. These FAQs are based on federal regulations and federal sponsors, nonfederal sponsors may have different terms and expectations. Review your award terms carefully and contact OSPA for assistance.

Federal agencies are aware of the challenges resulting from closures and disruptions due to COVID-19. We encourage you to visit the Council on Governmental Relations web repository of agency guidance related to COVID-19. This site is updated regularly and may be helpful.