U.S. Department of Agriculture (USDA) National Institute of Food and Agriculture (NIFA) Grants Frequently Asked Questions (FAQ)

This FAQ covers the most commonly asked questions about impacts of the COVID-19 emergency on USDA National Institute of Food and Agriculture (NIFA) grants. NIFA continues to evaluate options and flexibilities related to coronavirus impacts and will announce updates to this FAQ in the NIFA Update.

Questions about USDA NIFA Applications

- 1. Are proposal submission deadlines being extended?
- 2. I have a project with relevance to COVID-19, where can I submit it?
- 3. Can FY 2020 proposals include study abroad programs, which include sending students abroad in 2021?
- 4. Do applicants for NIFA grants need a current SAM registration when they apply?

Questions about NIFA Awards

- 1. Are NIFA awards covered under OMB's 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?"
- 2. Do the flexibilities provided by OMB-20-17 and associated NIFA policy apply to subrecipients?
- 3. What are my options if the COVID-19 emergency does not allow me to complete the project?
- 4. What do we do with conference grants and conferences already scheduled?
- 5. If my organization cancels an approved conference due to the impacts of COVID-19, are the costs incurred allowable costs under our award?
- 6. My organization is under a shelter-in-place order due to COVID-19. My team, whose salaries and benefit are charged directly to the award, cannot perform work while at their homes. Can we charge their time to the award during this time?
- 7. My organization is under a shelter-in-place order due to COVID-19. My project cannot perform research during this time. If the project cannot be completed in original duration or budget, what are my options?
- 8. Classes are cancelled, how do I complete the grant program requirements (my grant requires classroom instruction)?

- 9. How do I request a No-Cost Extension?
- 10. Our NIFA award includes study abroad program in summer 2020. Can that be postponed to 2021?
- 11. Are there any flexibilities to allow donation of Personal Protective Equipment (PPE) or use of staff or equipment funded through NIFA grants to produce PPE?
- 12. Is NIFA still conducting civil rights compliance reviews?

Gus Schumacher Nutrition Incentive Program (GusNIP) Questions

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

Other Questions

1. What if I have a question not covered by this FAQ?

Questions about USDA NIFA Applications

- 1. Are proposal submission deadlines being extended?
 - Please see the USDA <u>NIFA Deadline Extensions Due to COVID-19</u> page for NIFA program deadlines being extended due to coronavirus impact.
- 2. I have a project with relevance to COVID-19, where can I submit it?
 - In response to the current need for more COVID-19 information, certain NIFA programs will allow submission of COVID-19 relevant projects outside of their normal deadlines, including:
 - Agriculture and Food Research Initiative (AFRI) Foundational and Applied Science
 Request For Applications, specifically the following program area priorities:
 - Animal Nutrition, Growth and Lactation (A1231)
 - Critical Agricultural Research and Extension (CARE) (A1701)
 - Diseases of Agricultural Animals (A1221)
 - Economics, Markets, and Trade (A1641)
 - Food Safety and Defense (A1332)
 - Foundational Knowledge of Plant Products (A1103)
 - Novel Foods and Innovative Manufacturing Technologies (A1364)
 - <u>Small Business Innovation Research Program Phase I Request For Application</u> most relevant topic areas include:
 - Animal Production and Protection (8.3)

- Food Science and Nutrition (8.5)
- Rural Development (8.6)
- o Small and Mid-Size Farms (8.12)

Your project **must**:

- Fit the topics covered by the specific program that you are applying under
- Adhere to all the program area priority requirements (budget, project period, eligibility, etc.) except the application deadline
- Include "COVID-19 Rapid Response" in the title
- Be submitted by May 21, 2020

Applicants should notify the listed program area priority contact(s) that they are submitting a COVID-19 Rapid Response application for the application to be screened and peer reviewed.

Please visit the following website for additional information and updates: https://nifa.usda.gov/announcement/nifa-deadline-extensions-due-covid-19.

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

Yes.

4. 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.

Questions about NIFA Awards

1. Are NIFA awards covered under OMB's 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?"

Yes, please see NIFA-20-006 for guidance on applying the March 19, 2020 Office of Management and Budget 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," which provides administrative relief to recipients and applicants affected by the loss of operational capacity and increased costs due to the COVID-19 crisis. Additional questions regarding the applicability of the memorandum's administrative relief provisions should be directed to USDA NIFA's Awards Management Division at awards@usda.gov.

2. 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.

3. 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. This includes 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.

- **4.** What do we do with conference grants and conferences already scheduled?

 If your conference needs to be delayed, please check your award <u>Terms and Conditions</u> for information on how to request a No-Cost Extension (NCE).
- 5. 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. 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.

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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.

Since most scenarios related to allowability are fact specific, please contact NIFA at awards@usda.gov to consult with a grants specialist about your organization's specific circumstances.

6. My organization is under a shelter-in-place order due to COVID-19. My team, whose salaries and benefit are charged directly to the award, cannot perform work while at their homes. Can we charge their time to the award during this time?

Yes. 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.

In general, recipients should use salaries, stipends, and benefit 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.

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 charging of such costs or other fees result in a shortage of funds to eventually carry out the project.

This guidance applies to both capacity and competitive grants from NIFA.

7. My organization is under a shelter-in-place order due to COVID-19. My project cannot perform research during this time. 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.

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, please contact NIFA at awards@usda.gov to consult with a grants specialist about the organization's specific circumstances.

To discuss anticipated programmatic shortfalls, contact the National Program Leader.

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

8. 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.

9. How do I request a No-Cost Extension?

For competitive grants, please check your award <u>Terms and Conditions</u> for information on how to request a No-Cost Extension (NCE). NIFA is still evaluating the options for capacity grants.

10. 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.

11. Are there any flexibilities to allow donation of Personal Protective Equipment (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. 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.

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.

12. 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.

Gus Schumacher Nutrition Incentive Program (GusNIP) Questions

1. 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.

2. 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.

Other Questions

1. What if I have a question not covered by this FAQ?

If you have a program specific question, please contact the National Program Leader listed as contact for your program. For questions about awards, please contact NIFA at awards@usda.gov to consult with a grants specialist.