Frequently Asked Questions (FAQs) About the Coronavirus Disease 2019 (COVID-19) for Research Experiences for Undergraduates (REU) Sites, Research Experiences for Teachers (RET) Sites, International Research Experiences for Students (IRES) Sites, and Similar Activities

March 31, 2020

The following questions refer to "REU Sites" but are relevant to a range of NSF programs that issue grants to fund cohorts of participants in research and other activities over weeks or months. Given that COVID-19 and the associated impacts continue to evolve, recipients are strongly encouraged to monitor NSF's COVID-19 website for updates.

R1. I am hosting an REU Site. If a student arrives who appears sick, can I ask the student to return home?

Please follow the appropriate policies and practices of your organization. NSF defers to awardees on decisions regarding the safety and security of their faculty, students, and other personnel. Under the current circumstances, it would be prudent for Site directors to develop a plan, in concert with their organization's policies and practices, for handling the case of a student who appears ill or becomes ill.

R2. I am hosting an REU Site involving the participation of non-local students. A student from another university arrived and appeared to be ill. Health authorities have ordered that the student be quarantined. Can I use the REU Site grant funds to cover the cost of housing and meals for that student during the quarantine period, even though the student is unable to participate in REU Site activities?

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. Recipients may charge the full cost to the award when the event, travel, or other activities is 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. If a shortfall is anticipated, recipients must contact the cognizant NSF Program Officer to discuss the situation. 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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R3. I am a PI for an NSF-funded REU Site, conference, or research project in which the investigators are geographically distributed. I am considering replacing the planned face-to-face interactions with the use of virtual technology. Beyond simple videoconferencing, I would like to use augmented reality or other technology to make the interactions more effective. May I submit a supplemental funding request to purchase and distribute the necessary equipment and/or contract with a service provider?

Contact the cognizant NSF Program Officer managing your award. Supplements can be made to address unexpected events that threaten the original scope and objectives of an award, but the award of a supplement is contingent on the availability of funding at NSF. The Program Officer may also want to discuss whether the changes would constitute a "change in objectives or scope" of the award.

R4. Is NSF canceling or discouraging the operation of all REU Sites that were scheduled to operate during the summer of 2020?

No. REU Sites are funded by individual NSF grants, and grantees are responsible for making decisions about how to manage their grant-funded activities based on their organizational policies, their local conditions, the timing of the activities, the particular students and faculty who would participate in the activities, and other factors. Decisions about whether or how to operate REU Sites will vary from one grantee to another. NSF is not prescribing a "one size fits all" approach. In making decisions, we encourage grantees to consult the resources mentioned at the beginning of the "Frequently Asked Questions (FAQs) About the Coronavirus Disease 2019 (COVID-19) for National Science Foundation (NSF) Proposers and Awardees."

R5. What if my organization decides to cancel our NSF-funded REU Site for this summer? Do we need permission from NSF?

Contact the cognizant NSF Program Officer about this situation. REU Program Officers are open to the use of no-cost extensions to allow a postponement of this year's Site to a future year. All NSF grants are eligible for a one-year grantee-approved no-cost extension and then further extensions as approved by NSF. If you cancel your REU Site this summer and would like an extension because of the COVID-19 disruption: (1) Report the need and your plan to the cognizant NSF Program Officer for your award. (2) Describe the situation in your next Annual Project Report, particularly in the "Changes/Problems" section of the report. (3) When you submit the relevant "notification" (Grantee-Approved No-Cost Extension) or "request" (NSF-Approved No-Cost Extension) in Research.gov, describe the circumstances in detail in the "Justification" section of the form. If these steps are followed, the postponement should *not* require the submission of a request for "Changes in Objectives or Scope" via Research.gov.

R6. What if I could still operate my REU Site this summer but would need to restructure it in some way? Would that require permission from NSF?

Contact the cognizant NSF Program Officer about your situation. Program Officers are aware that running an NSF-funded activity in face of the COVID-19 situation may require flexibility and creativity, and different grantees will take different approaches. Besides some cancellations/postponements of REU Sites, program officers have heard from grantees that propose to convert their Site to a virtual Site (with online training modules, online lab visits, mediated virtual research, etc.) or "distributed" Site, run a shorter Site (one that would start later in the summer), enroll only students within driving distance from campus (but not regular students at the host university), or move the research location of a Site (for example, move an international REU Site, which was scheduled for a "no travel" zone, to the mainland United States so that there is a better chance that it might be able to operate this summer). Other restructurings are also possible. Students' research projects constitute the core component of an REU Site, the conduct of authentic research. While not all types of research are suitable for conversion to an online experience, virtual Sites may be allowed when the quality of students' experience is maintained and when the virtual research will enable the students to have outcomes similar to the original project design. When you outline your idea to your Program Officer, if the idea represents a major departure from the plans in your NSF award, the Program Officer might recommend that you submit a request for "Changes in Objectives or Scope" via Research.gov. In some cases, a request for "Reallocation of Funds Provided for Participant Support Costs" might also be required if there is a need to rebudget Participant Support Costs.

R7. If the REU Site that I direct is canceled, postponed, or re-timed this summer, when will my Annual Project Report be due?

NSF has automatically extended the due date for submission of all Annual Project Reports due between March 1 and April 30, 2020, by 30 days. These project reports must continue to be submitted via Research.gov. Recipients are reminded that NSF cannot make any new award or supplement any existing award if the principal investigator (PI) or any co-PI(s) has an overdue Annual Project Report; therefore, it is vital that annual reports are submitted by the revised due date.

R8. Suppose that my organization cancels our NSF-funded REU Site this summer, but I have already accepted students for the Site. May I guarantee slots for next summer to students who were accepted for this summer? If so, what about students who will graduate and thus would not be eligible "undergraduates" next summer?

If you wish to extend offers to students for next summer, follow your organization's policies and procedures. If you wish to include any students who will receive their bachelor's degree before next summer, contact the cognizant Program Officer for your

REU Site award, who might approve this exception through e-mail. Also describe your plan in your next Annual Project Report.

R9. Suppose that my organization cancels our NSF-funded REU Site this summer. Can expenses that have already been incurred prior to the cancellation of the Site be charged to the NSF grant? What about nonrefundable airline tickets that students purchased to travel to the Site? What about nonrefundable dorm or housing deposits that either students or my program (on behalf of the students) put down earlier?

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R10. I direct an REU Site and still plan to operate it this summer (although that plan could change). May I require that all students be tested for COVID-19 before participating in the REU Site? If so, could the cost of these tests be charged to the NSF grant?

Please follow the appropriate policies and practices of your organization. NSF defers to awardees on decisions regarding the safety and security of their faculty, students, and other personnel. In general, if your organization were to require *all similarly situated students* (i.e., all those participating in activities on campus during the summer months) to be tested, the costs for the tests for your REU students could be charged to the grant. (This answer should not be construed as a recommendation for such a requirement.)

R11. I direct an REU Site and still plan to operate it this summer -- but that plan could change at any time. Can students or my university charge travel insurance to the NSF grant, which would allow the cancellation of travel at the last minute without losing money on the tickets? If I have to change the start date of my REU Site (and the students' airline tickets have not been insured), could ticket change fees be charged to the NSF grant if the airlines have not waived them?

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R12. My organization recently decided to cancel our NSF-funded REU Site for this summer, but I have already accepted students, who declined offers from other Sites. May I pay those students their stipend, or at least part of their stipend, for the summer even though they will not be participating in my REU Site? At this point, some of those students may not be able to find other opportunities for research or employment for the summer.

Recipients are authorized to continue to charge salaries, stipends, and benefits to currently active NSF awards consistent with the recipients' policy of paying salaries (under unexpected or extraordinary circumstances) from all funding sources, Federal and non-Federal. The recipient also is authorized to charge other costs to NSF 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. If a shortfall is anticipated, recipients must contact the cognizant NSF Program Officer to discuss the situation. NSF 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 the charging of any salaries and other project activities costs related to interruption of operations or services.