

## Frequently Asked Questions (FAQs) About the Coronavirus Disease 2019 (COVID-19) for IES Grantees

1. **Where can I find helpful information related to COVID-19's potential impact on my research project, project-related travel, or field work?**

Your employing organization is an ideal starting point. In many cases, colleges and universities have created websites offering information.

Beyond that, we encourage you to consult the following resources:

- o COVID-19 in general: see the [Centers for Disease Control \(CDC\)](#) and [World Health Organization \(WHO\)](#) websites, and also refer to your state or local health department; and
- o Travel to/from and quarantine in foreign countries: see the [State Department Travel Advisory website](#)
- o COVID-19 ("Coronavirus") Information and Resources for Schools and School Personnel, see the [Department of Education website](#).

2. **Will IES provide for an extension to my award if the planned activities are disrupted by the COVID-19?**

Most IES awards are eligible for a one-year no cost extension and then further extensions as approved by IES. If you foresee a need for IES-approved extensions, you should discuss the need with the IES program officer for your award.

3. **We had planned to host a meeting or training, but the meeting has been canceled. Who do I contact regarding the impact to the IES award?**

You should contact the IES program officer about this situation. In light of the public health threat and the fact that many institutions, cities, communities, and states are restricting non-essential travel, you may wish to consider alternate plans, such as providing or using options for virtual participation. In addition, IES program officers will be open to rescheduling the conference or using the funds for a future meeting that is consistent with the original scope and objectives of the award. If the meeting or training is not rescheduled, you must first try to exercise any emergency or "act of God" provisions to the extent possible in light of the COVID-19 outbreak before charging the cost of the event and travel cancellation to the grant.

4. **If a conference, training, or other activity related to a grant from the Department is canceled due to COVID-19, may grant funds be used to reimburse nonrefundable travel (for example, conveyance or lodging) or registration costs that were properly chargeable to the grant at the time of booking?**

Yes, provided that a grantee or subgrantee first seeks to recover nonrefundable costs (for example, travel, registration fees) associated with a grant from the Department from the relevant entity that charged the fee (for example, airline, hotel, conference organizer). Some businesses are offering flexibility with regard to refunds, credits, and other remedies for losses due to the COVID-19 outbreak. Moreover, many agreements or contracts for conferences, training, or other activities related to a grant contain an emergency or "act of God" provision, and the grantee and its subgrantees must seek to exercise those clauses to the extent possible in light of the COVID-19 outbreak.

If a grantee or subgrantee is unable to recover the costs, the grantee or subgrantee may charge the appropriate grant for the cancellation costs, provided the costs were reasonable and incurred in order to carry out an allowable activity under the grant, consistent with the Federal cost principles described in 2 CFR Part 200 Subpart E of the *Uniform Administrative Requirements, Cost Principles, And Audit Requirements For Federal Awards* (Uniform Guidance).

Grantees and subgrantees should not assume additional funds 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. Grantees and subgrantees must maintain appropriate records and cost documentation as required by 2 CFR § 200.302 (financial management) and 2 CFR § 200.333 (record retention) to substantiate the charging of any cancellation or other fees related to interruption of operations or services.

5. **A conference where I was scheduled to present on my IES-funded project has been canceled, but I have nonrefundable travel and/or hotel costs. Can these be charged to an IES grant?**

Because this was a response to the COVID-19 outbreak, you are allowed to charge these costs to your IES grant. However, if the conference is not rescheduled, you must first try to exercise any emergency or "act of God" provisions to the extent possible in light of the COVID-19 outbreak before charging the cost of the event and travel cancellation to the grant. Please see the previous question (item 4) for additional information.

6. **If a grantee or subgrantee is planning future travel under a grant from the Department, may it purchase travel insurance with grant funds?**

Due to health concerns related to COVID-19, grant-supported travel generally should not be occurring. However, if travel is permitted by Federal, State, and local directives and is the only means to carry out an essential grant function that must be undertaken on a time-sensitive basis during the COVID-19 pandemic, consistent with the grantee's or subgrantee's travel policy, travel insurance is allowable provided the cost is reasonable and allocable to the grant consistent with the Federal cost principles described in 2 CFR Part 200 Subpart E of the Uniform Guidance.

7. **I am involved with an IES award that is planning to host a meeting that is taking place in the coming weeks. Should I continue with plans for the meeting?**

IES recommends first reaching out to the conference organizer or host to check for their contingency plans. If you are the organizer, you should consider developing contingency plans, such as setting up virtual participation, postponing the event, or cancelling the event. If the meeting or training is not rescheduled, you must first try to exercise any emergency or "act of God" provisions to the extent possible in light of the COVID-19 outbreak before charging the cost of the event and travel cancellation to the grant.

8. **What would you advise regarding reimbursement for any expenses related to participant cancellation?**

If the meeting or training is not rescheduled, you must first try to exercise any emergency or "act of God" provisions to the extent possible in light of the COVID-19 outbreak before charging the cost of the event and travel cancellation to the grant.

9. **Will APR and FPR extensions be granted due to award-related delays pertaining to COVID-19?**

If your institution is unable to complete and submit your Annual Performance Report (APR)—including both the financial and Research Progress Performance Reports (RPPR)—by the scheduled due date, due to the effects of COVID-19, please be sure to contact your IES Program Officer to let them know the reports will be late. We will then work with you to identify a new report due date.

10. **Where can we find additional information for Pathway fellows that had travel cancellation due to COVID-19?**

- Please follow-up on fellows' flights because airlines have announced flexible policies (see [AERA's travel resource page for details](#)), and many are not charging for canceled flights.
- For each fellow who had travel canceled/postponed due to COVID-19, please document the initial travel costs, the amount non-recoverable, the amount refunded, and proposed plans to reapply the refunded amounts. We will also consider your request about letting Pathways fellows who have already completed the program reapply travel funds to future meetings once we have further guidance from the Department of Education.

**11. Will IES extend my project timeline given that data collection has been interrupted?**

There will be some flexibility for extending project timelines. Please be sure to contact your IES Program Officer to discuss your situation.

**12. May a grantee or subgrantee continue to pay the compensation of an employee paid with grant funds from the Department during the period the employee is unable to work because his or her organization is closed due to novel Coronavirus Disease 2019 (COVID-19)?**

Yes. Generally, a grantee or subgrantee may continue to charge the compensation (including but not necessarily limited to salaries, wages, and fringe benefits) of its employees who are paid by a currently active grant funded by the Department to that grant, consistent with the organization's policies and procedures for paying compensation from all funding sources, Federal and non-Federal, under unexpected or extraordinary circumstances, such as a public health emergency like COVID-19.<sup>[1]</sup> Thus, if the organization pays, consistent with its policies and procedures, similarly situated employees whose compensation is paid with non-Federal funds during an extended closure, those paid with grant funds from the Department may also continue to be paid.<sup>[2]</sup> "However, an employee who is being paid with Department grant funds while the program grant activities are closed in whole or in part due to the COVID-19 pandemic may not also be paid for the time during which the program is closed by the organization or another organization for working on other activities that are not closed down."

If a grantee or subgrantee does not currently have in place a policy that addresses extraordinary circumstances such as those caused by COVID 19, the grantee or subgrantee may amend or create a policy in order to put emergency contingencies in place for Federal and non-Federal similarly situated employees. If the conditions exist for charges to be made to the Federal grant, charges may also be made to any non-Federal sources that are used by a grantee or subgrantee in order to meet a matching requirement.

A grantee and subgrantee must maintain appropriate records and cost documentation as required by [2 CFR § 200.302](#) (financial management), [2 CFR § 200.430\(i\)](#) (standards for documenting personnel expenses), and [2 CFR § 200.333](#) (record retention) to substantiate the charging of any compensation costs related to interruption of operations or services.

At the same time, recipients should consider ways that employees paid with grant funds can support continuing activities, including distance learning opportunities for students served by the grant.

**13. May I re-budget funds and tasks to ensure that my students/staff who were going to be collecting data continue getting paid?**

Yes, you may be able to re-budget funds consistent with your current policy of paying salaries (under unexpected or extraordinary circumstances) from all funding sources, Federal and non-Federal. However, you should discuss this with the IES program officer for your award. Please refer to the previous question (item 12) for additional information.

**14. If schools stay closed, I will lose my sample. What should I do? I don't have enough money left to regroup even if I do get a no cost extension.**

The Department of Education is currently working internally as well as with our federal partners on a number of proposals and award-related issues pertaining to COVID-19. IES will communicate with the research community about these issues and will provide guidance as further information becomes available. We are not, at this stage, in a position to make any commitments on supplemental funds being available and, for that reason, no grantee should make any plans or take any actions that assume that such funds will be available. In the meantime, please continue to follow all relevant policies and procedures, including those of your organization, and apply those practices consistently.

**15. Can I re-budget for necessary equipment or IT support if I need to change meetings or data collections into virtual experiences (for example, qualitative videos online).**

Yes, you may be able to re-budget funds if it is consistent with your current project plan. However, you should discuss this with the IES program officer for your award.

**16. Can I go ahead and reschedule travel to sites to collect data to next fall?**

Yes, you may be able to make changes to your project plan, however, you should discuss this with the IES program officer for your award.

**17. My school district will be closed until the end of the school year and that will affect my project. What can I do?**

You may be able to make changes to your project plan; however, you should discuss this with the IES program officer for your award. We are not, at this stage, in a position to make any commitments on supplemental funds being available and, for that reason, no grantee should make any plans or take any actions that assume that such funds will be available.

**18. Can I get a refund for an airline ticket for a conference that was canceled? Are there restrictions on how I use the airline credit moving forward?**

If you receive a refund on an airline ticket that was canceled, those funds should be treated as program income and used for grant-related costs. If you receive an airline credit, that credit should be used to support grant-related activities. If you receive neither an airline credit nor a refund, unrefunded or uncredited costs incurred for travel canceled due to COVID-19 can be charged to your grant. You must first try to exercise any emergency or "act of God" provisions to the extent possible in light of the COVID-19 outbreak before charging the cost of the event and travel cancellation to the grant. Please refer to item 4 above for additional information.

**NOTE:** The Department is planning to issue additional guidance related to waivers in areas addressed in the recent [OMB Memorandum M-20-17](#).

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#### Footnotes

[1] See Office of Management and Budget (OMB) Memorandum M-20-17, <https://www.whitehouse.gov/wp-content/uploads/2020/03/M-20-17.pdf>.

[2] 2 CFR §§ 200.403(c) (allowability of costs), 200.404 (reasonable costs), 200.405 (allocable costs), 200.430(b) (compensation for personal services), and 200.431(a)-(b) (fringe benefits).