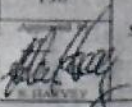


FINANCIAL MEMORANDUM

Memorandum No. 190	ICAHN SCHOOL OF MEDICINE AT MOUNT SINAI	Page 1 of 3
Approved by  M. HARVEY	SUBJECT: Flexibilities Available to Recipients of Federal Financial Assistance Affected by COVID-19 - Cost Related Flexibilities/Expenditure of Award Funds	Date Issued/Amended 05/17/2020
		Expires 05/26/2020

ICahn School of Medicine at Mount Sinai (ISM) is deeply concerned for the health and safety of its staff and employees involved in the day to day operations and sponsored programs including those supported by Federal and Non Federal sponsors, and about the effects on its biomedical enterprise.

Due to the potential exceptional impact of the declared public health emergency, working with the Office of Management and Budget (OMB) and the Department of Health and Human Services (HHS) NIH has identified the following short-term administrative flexibilities to assist grantees with managing administrative, financial management and audit requirements under the Uniform Guidance "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards" - which are implemented in HHS regulation at [45 CFR Part 75](#) - without compromising their accountability.

NIH website, [Department Response to Natural Disasters and Other Emergencies](#), has a list of available resources. The areas affected are listed in the link, [HHS declared public health emergency for COVID-19](#).

The purpose of this Policy is to set forth the administrative flexibilities that will apply to all sponsored programs. NIH has published the Notice Number: NOT-OD-20-086, Flexibilities Available to Applicants and Recipients of Federal Financial Assistance Affected by COVID-19. ISM expects other Federal and non-Federal sponsors to provide similar flexibilities.

These flexibilities are applicable to researchers conducting research activities related to or affected by COVID-19. Since our laboratories have been closed, or our research activities have been hindered due to COVID-19 precautionary measures and/or illnesses, ISM will be providing assistance to our researchers in accordance with this policy based upon NIH guidance.

ISM will provide the NIH/other sponsors, when requested, documentation describing the effects, and how long the facility and the research, clinical practices, or instruction was and/or will be affected (unknown at the present time).

The following flexibilities are being made available during this Public Health Emergency:

Pre-Award Costs

ISMMS is allowing pre-award costs to be incurred from January 20, 2020 through the public health emergency period and prior to the date of a federal award for all applicants and recipients that have been affected by COVID-19.

Prior Approval Requirement Waivers

ISM has re-budgeting authority available under NIH Grants Policy Statement Sec. 8.1.1.2., which states, “NIH prior approval is not required to re-budget funds for any direct cost item that the applicable cost principles identify as requiring the Federal awarding agency's prior approval, unless the incurrence of costs is associated with or is considered to be a change in scope.”

For grants that are not under Streamlined Non-competing Application Process (SNAP) ISM now has the discretion to carry forward unobligated balances on its active grants for immediate efforts to support activities related to or affected by COVID-19 as long as the charges are allowable costs and are within the scope of the original award.

In addition, ISM has the discretion to extend the final budget period of the approved project period on active non-SNAP grant projects grants one time for a period of up to 12 months without requesting prior approval, by notifying the assigned grants management specialist.

Cost Related Flexibilities/Expenditure of Award Funds

Salaries:

ISM understands that many researchers may be unable to continue all aspects of their current work as a result of or related to the effects of COVID-19. During this public health emergency, the NIH is permitting ISM pursuant to this adopted policy to continue charging salaries and benefits during periods when our researchers and staff are unable to work in the normal way or the work is impacted in any way due to the effect of COVID-19. Salaries and benefits, if otherwise allowable will continue to be charged to the sponsored awards regardless of the funding source, including Federal and non-Federal.

Accordingly, during this period ISM will not make salary source changes unless the following applies:

- 1) When a grant or other sponsored program funding award has ended, there is no available unobligated funds and the grant will not resume at a future date.
- 2) When new funding has been received specific to activities related to COVID19 or that may be carried out remotely.
- 3) For personnel transferring from one position to another.

As of May 18th ISMMS has resumed some non-COVID related research activities on-campus although on a limited scale and not impacting all faculty and staff. Therefore the following additional exceptions for salary source changes as of the May 18th date are added:

- 4) When new funding is received that can be carried out on campus.
- 5) When effort between two activities that are both actively being worked on changes.
- 6) When necessary to mitigate potential overlap.

Stipends:

ISM will continue to provide stipend payments to fellows and trainees who may be unable to work on-site as a result of or related to COVID-19. ISM will notify the assigned grants management official, and provide documentation demonstrating the effect of COVID-19, and how long the institution will be affected.

Travel:

Non-refundable costs associated with grant-related travel that has been cancelled due to COVID-19 may be charged to the sponsored awards if they would have otherwise been allowable.

Conference Registration Fees:

Non-refundable registration fees for conferences, symposiums or seminars that have been cancelled due to COVID19 may be charged to the sponsored awards if they would have otherwise been allowable (e.g. necessary to accomplish program objectives).

NIH-Supported Meetings and Conferences:

Scientific meetings, conferences and workshops supported by sponsored awards may be delayed or cancelled due to COVID-19. Non-refundable costs associated with meetings and conferences, supported by sponsored awards and affected by COVID-19 are allowable and may be requested as an administrative supplement to the appropriate funding agency. Principal Investigators (PIs) should contact their assigned grants management specialist and program official through our Grants and Contracts Office (GCO) to provide documentation demonstrating the effect of COVID-19. The funding agency will work with the PI/GCO to address the impact on the NIH grant.

Extension of Closeout

- NIH will allow ISM to delay submission of any final financial, performance, and other reports required by the terms and conditions of award for the closeout of expired projects, provided that proper notice about the reporting delay is given to the agency. This delay may not exceed one year.

Extension of Single Audit Submission

- NIH will allow ISM to delay the completion and submission of the Single Audit report for up to 12 months beyond the normal due date.
- The delayed completion and submission would still qualify the recipient as a “low-risk auditee” under the criteria of 45 CFR 75.520.

As this Public Health Emergency continues, ISM may identify additional cost-related flexibilities that are needed and bring them to the NIH and sponsors for consideration

Please contact Sponsored Projects Finance (646-605-4023) if you have any question regarding this policy.