COVID RESOURCES

Revised April 1, 2020

The COVID-19 public health emergency is impacting the research community in a myriad of known and yet to be known ways. This is intended to be a clearinghouse of Harvard Guidance and Federal Information related to research. RAS will update this document as additional guidance is issued.

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NSF
NSF’s response to COVID-19 can be found on the NSF homepage. PI’s with specific questions should contact their NSF program officer. Sponsored research offices should contact the Division of Grants and Agreements.

NSF Implementation of flexibilities authorized by OMB Memo M-20-17 (March 23, 2020)
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- Managing organization and prime contractors should communicate with appropriate NSF staff for consultation, to keep them informed of status, and to ask any questions you may have.
  - For financial assistance agreements, managing organizations should communicate with your program officer (PO) and grants and agreements officer (G/AO). Please copy COVID19_DACS@nsf.gov
  - For prime contractors, contractors should communicate with your contracting officer representative (COR) and contracting officer (CO). Please copy COVID19_DACS@nsf.gov
• Additional costs incurred related to COVID-19 should be documented carefully.

**NSF Interim Guidance for Travel, Merit Review Panels and NSF-sponsored Meetings (March 9, 2020)**

- Impact on NSF’s acceptance and review of proposals
- Reviewers scheduled to participate in person in upcoming NSF merit review panel, including virtual panel compensation
- Impact on award oversight
- Impact on meetings funded via a grant from NSF

**NSF’s Dear Colleague Letter NSF 20-052 (March 4, 2020) on Coronavirus-related research**

**NASA**

**FAQs on COVID Impacts on NASA Grants (March 25, 2020)**

Below is a list of frequently asked questions that NASA has received from award proposers and recipients (both recipients with COVID-19-related awards and those with other types of NASA awards) affected by the COVID-19 crisis. Please note that these administrative relief flexibilities as outlined in the OMB Memo M-20-17 are time-limited and will be reassessed on June 18, 2020. After that point, NASA will reassess its guidance to determine whether additional updates are required.

1. Can universities pay soft-money researchers from NASA grants while the labs are closed?

   Universities may allow the payment of soft-money researchers using NASA grant funds, as well as graduate students, post-docs, and other lab staff during the COVID-19 epidemic if the institution's policies allow it. According to the OMB Memo (M-20-17):

   Agencies may allow recipients to continue to charge salaries and benefits to currently active Federal awards consistent with the recipients' policy of paying salaries (under unexpected or extraordinary circumstances) from all funding sources, Federal and non-Federal. Awarding agencies may allow other costs to be charged to Federal awards necessary to resume activities supported by the award, consistent with applicable Federal cost principles and the benefit to the project. 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.

2. What is the process for issuing incremental funding? How will funding increases be addressed when work has not been able to proceed? No-cost extensions (NCEs) are not enough due to paying individuals to maintain lab capability during closures.

   As in the response to #1 (above), OMB Memo M-20-17 allows for institutions to charge restart costs to their grants:
Awarding agencies may allow recipients to continue to charge salaries and benefits to currently active Federal awards consistent with the recipients’ policy of paying salaries (under unexpected or extraordinary circumstances) from all funding sources, Federal and non-Federal. Awarding agencies may allow other costs to be charged to Federal awards necessary to resume activities supported by the award, consistent with applicable Federal cost principles and the benefit to the project. Awarding agencies may also 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 progress reports and other communications with the grantee. Awarding agencies must require recipients 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.

Individual NASA programs are able to make use of the 2 CFR 200 flexibility stated above to allow costs associated with resuming funded grant activities to be charged to currently active grants. However, the decision as to if awards negatively impacted by the COVID-19 crisis will be provided additional funding will have to be made on a program-by-program basis. Award recipients must not assume that NASA will be able to provide additional funding to cover funding losses associated with the COVID-19 crisis.

3. How will unreleased grant funding be impacted?

Currently, several staff members at the NASA Shared Services Center (NSSC) routinely work remotely; therefore, there is no anticipated interruption of grant processing at this time.

4. Personal Protective Equipment (PPE) was purchased using grant funding. Can PPE be donated to local first responders?

Donating Personal Protective Equipment (PPE) purchased with NASA grant funding to first responders is allowed under grants directly related to the COVID-19 emergency response and grants not related to the COVID-19 response on a case-by-case basis. However, the recipient should not assume that additional funds are available should the costs of donating the equipment result in a shortage of funding or supplies at a later date. Additionally, before donating the PPE, recipients must first notify and obtain approval from their cognizant NASA program office. The recipient must also document and maintain records on all PPE donated to local first responders in response to the COVID-19 crisis.

5. Viral DNA Isolation Kits were purchased using grant funding. Can the kits be donated to local first responders?

Donating Viral DNA Isolation Kits purchased with NASA grant funding to first responders is allowed under grants directly related to the COVID-19 emergency response and grants not related to the COVID-19 response on a case-by-case basis. However, the Recipient should not assume that additional funds are available should the costs of donating the equipment result in a shortage of funding. Additionally, before donating the Viral DNA Isolation Kits, recipients must first notify and obtain approval from their cognizant NASA program office. The recipient must also document and maintain records on all Viral DNA Isolation Kits donated to local first responders in response to the COVID-19 crisis.
6. How will NASA programs address funding opportunity due dates and proposals submitted late due to the COVID-19 crisis?

On a program-by-program basis, NASA may extend the deadlines for specific funding opportunities or may allow proposals started before the due date but submitted after the due date as a result of the COVID-19 crisis to be considered for funding. All funding opportunities and their current due dates can be found on the NASA Solicitation and Proposal Integrated Review and Evaluation System (NSPIRES) and Grants.gov. If a current funding opportunity deadline remains unchanged and a proposer cannot meet that deadline due to COVID-19, then the proposer should contact the cognizant NASA program office to discuss the issue.

7. Can fringe benefits policies be amended to incorporate emergency paid leave for staff retention purposes?

Recipients are authorized to continue to charge salaries and benefits to currently active Federal awards consistent with the recipient organization's policy of paying salaries (under unexpected or extraordinary circumstances) from all funding sources, Federal and non-Federal. The recipient must also document and maintain records to substantiate the charging of any salaries and other project activities costs related to interruption of operations or services.

8. Is there a limitation on when salaries and benefits should charge to an award?

OMB Memo M-20-17 offers relief to recipients without any limitation. If salaries and benefits are budgeted items of an award, then anyone performing activities under that award would be allowed to charge their salary and benefits to the award as long as there is funding available and as long as it is consistent with the entity’s policy for paying salaries. The recipient must also document and maintain records to substantiate the charging of any salaries and other project activities costs related to interruption of operations or services.

9. Does NASA plan to address changes to Indirect Cost rates that may have occurred because of increased costs in certain activities?

No, recipients may continue to use the currently approved indirect cost rates (i.e., predetermined, fixed, or provisional rates) to recover their indirect costs on Federal awards. Agencies may approve grantee requests for an extension on the use of the current rates for one additional year without submission of an indirect cost proposal. Agencies may also approve grantee requests for an extension of the indirect cost rate proposal submission to finalize the current rates and establish future rates.

10. What is NASA’s guidance for entities whose System for Award Management (SAM) registration have expired or set to expired in 60 days?

Current registrants in the System for Award Management (SAM) with active registrations expiring between March 19 and May 17, 2020, will be automatically afforded a one-time extension of 60 days. The General Services Administration (GSA) has initiated 60-day extensions to SAM.gov registrations that have expiration dates within this range, and it will take the GSA until March 28, 2020 to complete all extensions. This effort is intended as relief for those otherwise required to re-register during that period.
GSA anticipates 61,298 registrations will be impacted by these extensions and plans to process the extension under the following timeline:

<table>
<thead>
<tr>
<th>Date</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>3/23-27/2020</td>
<td>Registrations expiring from 3/24/2020 to 5/17/2020 extended 60 days. Extensions will be processed at a rate of about twelve thousand per day.</td>
</tr>
<tr>
<td>3/28/2020</td>
<td>Actions Complete</td>
</tr>
</tbody>
</table>

**COVID-19 Impact to NASA SBIR/STTR Program**

**Department of Defense (DOD)**

Frequently Asked Questions for DOD Research Proposers and Awardees Impacted by the Novel Coronavirus (COVID-19)

DARPA Frequently Asked Question (FAQ) about COVID-19 (Coronavirus)

**USAMRAA**

This version dated March 25, 2020, replaces the FAQ’s published on March 16, 2020. On March 19, 2020 OMB issued 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 ([https://www.whitehouse.gov/wp-content/uploads/2020/03/M-20-17.pdf](https://www.whitehouse.gov/wp-content/uploads/2020/03/M-20-17.pdf)). The Department of Defense (DoD) also recently published Frequently Asked Questions (FAQs) ([https://basicresearch.defense.gov/COVID-19/Frequently-Asked-Questions/](https://basicresearch.defense.gov/COVID-19/Frequently-Asked-Questions/)). The United States Army Medical Research Acquisition Activity (USAMRAA) will apply, to the maximum extent possible, all the allowed exceptions to our financial assistance awards, including allowance of costs. The following exceptions, aligned with the format in Memorandum M-20-17 and guidance from the DoD, are time limited. OMB anticipates reassessing the exceptions within 90 days.

1. Flexibility with SAM registration:

   - The SAM registration process will be relaxed as outlined in M-20-17.

2. Flexibility with application deadlines:

   - There are currently no plans to modify existing application deadline dates but please continue to monitor Grants.gov for any potential change(s) to an application deadline.
• Please contact the CDMRP Help Desk at help@eBRAP.org or 301-682-5507 if you need further assistance.

• This response may be updated at a later date depending on whether application review panel meeting dates are revised. Please check this page periodically for possible updates.

3. Waiver of Notice of Funding Opportunities Publication:

• USAMRAA has no immediate emergency Program Announcements for grants or cooperative agreements available at this time.

• This response may be updated at a later date depending on whether application review panel meeting dates are revised. Please check this page periodically for possible updates.

4. No-cost extensions on expiring awards:

• USAMRAA’s terms and conditions of award already allow for a one-time, no cost extension of up to 12 months, without need to request prior approval, when the recipient notifies the Grants Officer (GO).

• Recipients may notify USAMRAA’s GO(s) of a blanket no-cost extension on all active awards (including grant numbers) covered under M-20-17 -- i.e., they do not need to be requested on an individual basis for each award.

• However, please be aware that funding expiration statutes may prohibit extensions. Recipients should contact the USAMRAA GO for award-specific guidance.

5. Abbreviated continuation requests:

• Not applicable for USAMRAA grants and cooperative agreements.

6. Expenditure of award funds for salaries and other project activities:

• Recipients may continue to charge salaries and benefits to currently active awards consistent with the recipients’ policy of paying salaries (under unexpected or extraordinary circumstances) from all funding sources, Federal and non-Federal.

• USAMRAA will allow other costs to be charged to Federal awards necessary to resume activities supported by the award, consistent with applicable Federal cost principles and the benefit to the project. This may include allowing rent on equipment and facilities during this time frame.

• However, to the maximum extent practicable, recipients must invoke or institute any and all reasonable mitigation actions and practices to lessen the cost to the Government during the crisis period. Such actions may be part of an existing program created by the recipient organization or may be created to respond to this crisis.

• Recipients must 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.

7. Allowability of Costs not Normally Chargeable to Awards:

• USAMRAA will allow 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, to charge these costs to their award without

• USAMRAA will allow recipients to charge full cost of cancellation when the event, travel, or other activities are conducted under the auspices of the grant.

• However, recipients 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.

• 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.

8. Prior approval requirement waivers:

• OMB and DoD have authorized awarding agencies to waive prior approval requirements as necessary. Some prior approvals are already waived under the DoD General Research &Development Terms and Conditions and USAMRAA’s agency-specific terms conditions.

• Recipients should consult their GO regarding other potential prior approval waivers based on project-specific circumstances.

• All costs charged to Federal awards must be consistent with Federal cost policy guidelines and the terms of the award, except where specified in OMB Memorandum M-20-17.

9. Exemption of certain procurement requirements:

• The procurement requirements contained in 2 CFR 200.319(b) regarding geographic preference and 2 CFR 200.231 regarding contracting with small and minority businesses, women’s business enterprises, and labor surplus supply firms are waived in order to expedite the procurement process for needed support during the period outlined in OMB Memorandum M-20-17.

10. Extension of financial and other reporting:

• Recipients may delay submission of financial, performance and other reports on currently active award accounts up to three (3) months beyond the normal due date.

• Contact the GO and Grants Officer’s Representative (GOR) for extensions on other milestones and deliverables required in the terms and conditions of the award. If warranted, the same three-month extension may be granted.

• Recipients may continue to invoice for payment of Federal funds without timely submission of reports.

• Reports must be submitted at the end of the postponed period. Additional extensions require prior approval of the GO.

11. Extension of currently approved indirect costs rates:

• Recipients may continue to use the currently approved indirect cost rates (i.e., predetermined, fixed, or provisional rates) to recover their indirect costs on Federal awards.

• Recipients may contact their cognizant agency for indirect costs to request an extension on the use of the current rates for one additional year without submission of an indirect cost proposal. The cognizant agency may also approve requests for an extension of the indirect cost rate proposal submission to finalize the current rates and establish future rates.

12. Extension of closeout:
• Recipients may delay submission of any pending financial, performance and other reports required by the terms of the award for the closeout of expired projects, provided that proper notice about the reporting delay is given by the grantee to the GO.
• This delay in submitting closeout reports may not exceed one year after the award expires.


• Implemented as stated in M-20-17.

14. The COVID-19 pandemic has impacted the conduct of my DoD-supported human subjects research protocol. What do I need to report to the USAMRDC Human Research Protection Office (HRPO)?

• For guidance, visit https://mrdc.amedd.army.mil/index.cfm/collaborate/research_protections/hrpo/faqs

15. ACURO Guidance During the COVID-19 Pandemic


Department of Energy (DOE)
Check FOA solicitations and DOE Lab Announcements for news on potential extensions and updates.

As of March 16, 2020:

Applicants preparing a pre-application, letter of intent, or application:

If the lead principal investigator (PI) or the applicant institution are subject to a quarantine or a closure, deadlines for submitting pre-applications, letters of intent, or applications may be extended by no more than fourteen (14) days from the applicable due date. Please contact the Program Manager identified in the FOA or DOE Laboratory Announcement under which the pre-application, letter of intent, or application is being submitted prior to the applicable due date.

Awardees preparing progress reports:

If the lead principal investigator (PI) or the applicant institution are subject to a quarantine or a closure, progress reports for grants, cooperative agreements, and interagency awards may be submitted through the PAMS website at https://pamspublic.science.energy.gov as soon as practicable. Note that delays in submitting progress reports may cause unavoidable delays in continuation funding.

PIs from DOE National Laboratories should contact their program manager if there will be a delay in submitting progress reports.

Applicants and awardees preparing revised budgets or public abstracts:
If the principal investigator (PI) or the applicant institution are subject to a quarantine or a closure, revised budgets and public abstracts may be submitted through the PAMS website at https://pamspublic.science.energy.gov as soon as practicable. Note that delays in submission may cause unavoidable delays in making awards.

Awardees with changed travel plans:

The Office of Science will not consider changes to planned travel caused by the cancellation of meetings, quarantines, closures, or other public health measures to be a change in the scope of an award requiring agency prior approval. Rebudgeting funds that does not create a change in scope does not require agency prior approval.

If a meeting has been cancelled, awardees must follow their institutional travel policies to determine whether costs may be charged to an award. If institutional policy permits travelers to purchase nonrefundable items (airfare, lodging, or other) and does not require travelers to reimburse the institution for change or cancellation fees, such fees may be charged to an award. If institutional policy prohibits the purchase of nonrefundable travel or travelers are required to reimburse the institution for change or cancellation fees, such fees may not be charged to an award.

Please review the attached Q&As. You are encouraged to contact the Administrative Contact for the FOA/Laboratory Announcement or your Program Manager with any concerns or questions regarding your circumstances.

Questions and Answers (Q&As):

Q: The scientific conference my lab group was scheduled to attend has been cancelled. Can our costs be reimbursed?

A: Yes, if your institutional travel policy:

   a. Permits the purchase of nonrefundable travel, and
   b. Does not require reimbursing the institution for change or cancellation fees.

Priority should be on costs incurred by students and postdocs, not by their departments.

Q: My institution told all employees to work from home. May I request an extension to a deadline?

A: Working from home—while it may introduce some complications—should not make it impossible to complete work or meet deadlines. If closure or remote access orders by your institution has occurred within a week of the deadline, please contact your Program Manager.

Q: My Sponsored Research Office has been closed. How do I request a deadline extension?

A: Please contact your Program Manager and include a copy of the closure order or other official notification.

Q: My Vice President for Research, who customarily signs all applications, has been quarantined. What should I do?

A: Please work with your Sponsored Research Office to determine how your institution is handling the situation. If your institution has established delegations of authority or if your Vice President for
Research is capable of electronic signatures, there should be no impact on your ability to submit an application. However, if submitting an application is impossible, please contact your Program Manager.

Q: Our postdoc was quarantined after visiting family overseas. Our experiment has fallen behind schedule. Will this delay impact our continuation funding?

A: Please explain the situation—without disclosing protected personally identifiable information—in your progress report. SC may need to modify an award to be a prudent steward of taxpayer funds by delaying access to continuation funds, but SC’s interest is in seeing the research results—even if it takes longer than originally expected.

Q: What information should I include in a request for a deadline extension?

A: Please include official confirmation of the closure, quarantine, or other incident that makes a timely submission impossible. An institutional declaration requiring staff telework, in and of itself, will not warrant a deadline extension. There must be further complications that make the original deadline impossible. Requests to extend a deadline must be made before the deadline. SC does not expect to support every request for an extension.

Q: May I submit a letter of intent, preproposal, proposal, or progress report before its deadline?

A: SC always encourages prompt and timely submissions. Progress reports may not be submitted more than one month before they are due.

Department of Education (DoEd)

IED - Institute of Education Sciences
From the IES Director on March 31, 2020:

“IES continues to conduct the work that is central to our mission, including awarding new grants, preparing future grant competitions, planning statistical surveys and assessments, analyzing survey and evaluation results, and conducting peer reviews for IES competitions and reports.

... Not surprisingly, some data collections are on hold and many of our researchers are worried about the viability of their projects.

The research commissioners and their teams continue to reach out to our stakeholders helping explain how we are adapting to the COVID-19 crisis and how it may affect specific projects. As always, our program officers are the best source for information and advice about projects and needed modifications.

We realize that the consequences of the pandemic will include scheduling and financial issues; but at this time, it is hard to assess its full toll on our funded work, including both contracts and grants. In the short term, IES will be as flexible as possible in allowing extensions of reporting deadlines and no-cost
extensions for grants and identifying modifications for contracts that may be needed in the face of massive school closures.

In the longer term, we will do everything we can to support the completion of as many of the critical tasks and objectives of funded projects as possible—all the while balancing the need for flexibility against our on-going commitment to rigor and measurable outcomes. IES has considerable autonomy as a science agency, but we clearly will follow the extensive (and evolving) national guidelines about flexibility in grants and contracts.”

NON-FEDERAL INFORMATION

Arnold Ventures (incl. Laura and John Arnold Foundation)
• We understand that many of our grantees are unable to go to their universities or work spaces, attend conferences, or move their work forward as expected. This may mean that some of our grantees may not be able to meet their milestones, or may even find their work jeopardized. Please know that we are aware of the challenges you’re facing and are committed to partnering with you to find solutions.

• You will receive further guidance shortly from your programmatic team lead, but the long and short of it is: If you are experiencing, or anticipate, any difficulties with your work related to COVID-19, please reach out to your project lead and grant manager to discuss if you haven’t already.

• We will update you frequently through emails and our website. If you have any questions or requests for us, or if you need support managing stakeholder issues or media inquiries related to COVID-19, please contact info@arnoldventures.org.

Mellon Foundation
First, please know the Foundation’s work is continuing uninterrupted. We will be making grant payments and reviewing proposals as usual.

Second, we recognize that efforts to mitigate the rapid spread of COVID-19 may have disrupted your work. If your ability to do grant-related work has been affected, know that we will flexibly work with you to make adjustments as needed.

Third, we know that many of you are experiencing unsettling organizational challenges. We are carefully keeping you in mind as we think through the uncertainties. You will soon hear more from your main contacts in your specific program area, and they will be available to answer questions and offer support in the coming days and weeks.

Finally, while Mellon’s staff will be working remotely at least for the coming week and longer if
prudent, we expect to be available to you, as always. If you have questions or concerns, please let us know.

**Ford Foundation**

**Highlights:**

- For grantee partners receiving project support, we are open to converting your current project grants to general support, so that you have maximum flexibility to respond to COVID-19.
- We are open to changing the payment schedule for your grant if that would be helpful to you.
- Grant funds will not be rescinded if a program, conference, or other grant activity is canceled or postponed due to COVID-19.


**Raikes Foundation**

We have signed the [Council on Foundations’ COVID-19 Response Pledge](https://www.foundationsoncouncil.org/COVID-19-Response-Pledge), marking our commitment to be as flexible and responsive as possible with existing and new funding. We know many of our grantee partners are working hard to adapt in this moment, and we want to be as supportive as we can to allow grantees to do what they need to take care of their staff and the communities they serve.

Specifically, we will loosen restrictions on our current grants, be flexible on reporting requirements and other demands on our grant partners’ time and make new grants as unrestricted as possible during this crisis. Our goal is to ensure that our grant partners have the flexibility to respond and adapt to this everchanging situation. And as always, we will continue to lift up the voices and leadership of our partners as they do the critical work of advancing policy, programs and practices that support a more just and equitable world.

We know that the situation is evolving, and new challenges are rapidly emerging for our grantees and the families they serve. We’ve made a contribution to the [Seattle Foundation’s COVID-19 Response Fund](https://www.seattletcf.org/fund-the-future) to address immediate and long-term needs in our community, and our team will continue working to identify additional opportunities for funding and collaboration to address the pandemic.

Click [here](https://www.seattletcf.org/fund-the-future) for the full statement.