

# 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](#).

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14. Has there been any extension to the date that funds cancel and when Treasury sweeps grant funds?
15. Do I need to submit my full Progress Report to attain a continuation award or attain a No-Cost Extension (NCE)?
16. How do recipients of federally-assisted programs prominently display the “And Justice For All” Civil Rights poster where it can be viewed by customers while adhering to social distancing guidelines?
17. What kinds of COVID-19 related extensions are available for existing grants?
18. Capacity funds provided under McIntire-Stennis were previously limited by policy to 50% carryover. For carryover from FY20 to FY21, can that carryover limit be raised to 100% due to COVID-19?
19. Can we use 1890 Scholarships funding to buy computers, books, pay for tuition, etc., to support students with distance education during the pandemic? I seem to remember that the money can be spent for education. Do recipients (Universities) still need approval from NIFA if the budget has more than 10% change?
20. Can recipients purchase Personal Protective Equipment (PPE) supplies for faculty, staff, and students supported by capacity grants? Is this an allowable cost?
21. Has there been any extension of currently approved indirect cost rates?
22. Is there an extension to single audit requirements?

#### **Gus Schumacher Nutrition Incentive Program (GusNIP) Questions**

1. Can qualifying purchases made with Pandemic EBT (P-EBT) or Disaster SNAP (D-SNAP) benefits count for the purposes of earning a GusNIP incentive?
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?

#### **Other Questions**

1. What if I have a question not covered by this FAQ?
2. Has NIFA received any additional COVID-19 specific funding under any recent appropriations bills?
3. Do you anticipate the current situation with COVID-19 will affect funding rates next year?

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### **Questions about USDA NIFA Applications**

**1. Are proposal submission deadlines being extended?**

Please see the USDA [NIFA Deadline Extensions Due to COVID-19](#) page for NIFA program deadlines being extended due to coronavirus impact.

**2. Where will new opportunities for funding to assist with COVID-19 related activities be posted?**

All NIFA opportunities will be posted on grants.gov and COVID-19 related activities will be posted on our [COVID-19 webpage](#). The best way to keep abreast of opportunities NIFA offers is to [subscribe](#) to the NIFA Update, Funding Opportunities, and other NIFA publications.

**3. Do applicants for NIFA grants need a current SAM registration when they apply?**

Generally, yes. The requirement for System for Award Management (SAM) registration at time of application may be temporarily waived by the NIFA NPL for any applications where current registrants in the System for Award Management (SAM) with active registrations expiring before **May 16, 2020** were afforded a one-time extension of 60 days under OMB memo [M-20-17](#). 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*.

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### **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?”**

[OMB M-20-17](#), *Administrative Relief for Recipients and Applicants of Federal Financial Assistance Directly Impacted by the Novel Coronavirus (COVID19) due to Loss of Operations* (March 19, 2020), and [OMB M-20-20](#), *Repurposing Existing Federal Financial Assistance Programs and Awards to Support the Emergency Response to the Novel Coronavirus (COVID-19)* (April 9, 2020), **expired on June 16, 2020** and were **rescinded on June 18, 2020** by OMB M-20-26. Any requests for use of flexibilities specified in OMB Memoranda M-20-17 or M-20-20 that were submitted on or before **June 16, 2020** are actionable by NIFA if included in NIFA’s implementation.

The purpose of OMB M-20-26 is to implement updated guidance authorized by the Office of Management and Budget (OMB) for recipients affected by COVID-19. This guidance extended two of the items listed in OMB M-20-17 that provided short-term administrative relief from specific requirements contained in 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards, without compromising accountability requirements.

These extensions, which go beyond what OMB previously outlined in Memorandum M-20-17, specifically pertain to the allowability of salaries and other project activities, which was extended through September 30, 2020, and the extension of the single audit submission, which was extended through December 31, 2020. In order to support charges against NIFA awards, recipients are reminded of their responsibility to maintain appropriate records and documentation to support the charges in accordance with institutional policies and procedures.

**2. What are my options if the COVID-19 emergency does not allow me to complete the project?**

The project directors may 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.

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

If your conference needs to be delayed, please check your award [Terms and Conditions](#) for information on how to request a No-Cost Extension (NCE).

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**4. 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 the conference was

- planned to occur **between March 1, 2020 and June 16, 2020**, and
- your organization rescheduled 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).

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, recipients are encouraged to contact USDA NIFA's Awards Management Division to discuss their situation at [awards@usda.gov](mailto:awards@usda.gov) for competitive grants or [capacitygrantquestions@usda.gov](mailto:capacitygrantquestions@usda.gov) for capacity grants to consult with a grants specialist about your organization's specific circumstances.

**5. My organization is under a shelter-in-place order due to COVID-19. My team, whose salaries and benefits 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, if approved on a case-by-case basis. Until recently, government-wide guidance (e.g., in OMB memo M-20-26) expressly allowed recipients of grants and cooperative agreements the flexibility to pay salaries and benefits of participants who could not work because of COVID-19 (e.g., because they could not get into a necessary facility closed due to COVID-19). Although the government-wide flexibility in OMB memo M-20-26 ended on 9/30/20, USDA NIFA will continue to exercise its authority to issue exceptions to the regulation on a case-by-case basis in accordance with 2 CFR 200.102 "Exceptions".

Award recipient(s) must send their request to [awards@usda.gov](mailto:awards@usda.gov) stating that they have experienced a loss of operational capacity due to the COVID-19 pandemic and that they need to charge salaries or benefits to an active USDA NIFA award consistent with their policies of paying salaries under unexpected or extraordinary circumstances. Recipients may also request to incur costs related to resuming activities supported by the award, consistent

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with applicable Federal cost principles and the benefit to the project. The request must include the award number, how long they need the flexibility to be extended, and their plans to resume activities after the extended flexibility expires.

Award recipients are encouraged to submit their requests to utilize this flexibility as soon as possible. Award recipients may take advantage of this flexibility and incur costs prior to obtaining USDA NIFA prior approval. However, any costs incurred under this flexibility without USDA NIFA prior approval are incurred at the recipient's own risk. If a recipient incurs costs under this flexibility prior to obtaining USDA NIFA approval, and USDA NIFA ultimately denies their request, then the costs incurred must not be charged to the USDA NIFA award. 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 original goals of the project. This guidance applies to both capacity and competitive grants from NIFA.

If a recipient faces challenges to meeting 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. To discuss any concerns related to salaries, stipends, and benefits rates and staffing levels, anticipated shortfalls or other administrative options, which may include No-Cost Extensions and change in scope, please contact NIFA at [awards@usda.gov](mailto:awards@usda.gov) to consult with a grants specialist about the organization's specific circumstances.

NIFA may also evaluate the recipient's ability to resume the project activity in the future and the appropriateness of future funding, as done under normal circumstances—based on subsequent annual project reports and other communications with the recipient. Payroll costs paid with the Paycheck Protection Program (PPP) loans or any other Federal Coronavirus Aid, Relief, and Economic Security (CARES) Act programs must not be charged to current NIFA awards as it would result in the Federal government paying for the same expenditures twice.

Recipients are reminded of their responsibility 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*. Due to the limited funding resources under each NIFA award necessary to achieve its specific project, as specified in M-20-26, recipients must exhaust other available funding sources to sustain its workforce and implement necessary steps to save overall operational costs (such as rent renegotiations) during this pandemic period in order to preserve Federal funds for the ramp-up effort. Recipients must retain documentation of their efforts to exhaust other funding sources and reduce overall operational costs.

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**6. 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 in meeting 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.

Issues 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](mailto:awards@usda.gov) to consult with a grants specialist about your 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.

**7. Classes are cancelled, how do I complete the grant program requirements (my grant requires classroom instruction)?**

If a recipient faces challenges in meeting the program objectives of the award due to class cancellations that directly impact the completion of your grant objectives, the recipient 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.

**8. How do I request a No-Cost Extension?**

For competitive grants, please check your award [Terms and Conditions](#) for information on how to request a No-Cost Extension (NCE). NCE requests will be reviewed on a case-by-case basis.

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**9. 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?**

Recipients were authorized to 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 from **March 1, 2020 to June 16, 2020**. Recipients that made donations during this limited authorization period 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.

After **June 16, 2020**, NIFA may consider donations on a case by case basis, in accordance with the property standards of 2 CFR part 200.

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 meeting 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.

**10. 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.

**11. Can NIFA grant recipients use funds under their NIFA grant to pay hazard pay?**

Hazard pay may be paid consistent with the grantee organization's policies, as well as state and federal laws. Federal employees must follow the policies of their employing agency. Recipients must not assume that supplemental funding will be available should the charging of such pay result in a shortage of funds to eventually carry out the project.

Recipients are required to maintain appropriate records and cost documentation for salaries, consistent with 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.

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If a recipient faces challenges to meeting 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. Have ASAP operations been adversely affected during this period of social distancing?**

No. As always, if you have any ASAP questions that need to be addressed to NIFA, please contact [ASAPCustomerService@usda.gov](mailto:ASAPCustomerService@usda.gov).

**13. Has there been any extension of the period to draw down funds in Treasury's ASAP system?**

The ASAP system "End Date" is the final date to process drawdowns in ASAP for any grant. Currently, per NIFA practice, this ASAP system "End Date" is set for 90 days after the grant's Period of Performance (POP) closes. If a No-Cost Extension (NCE) is granted, then the ASAP "End Date" will be extended to 90 days after the new POP closes. If the final reporting due date is extended, the ASAP "End Date" will be adjusted to account for the new due date. If there are questions about the ASAP end date, please contact [ASAPCustomerService@usda.gov](mailto:ASAPCustomerService@usda.gov) for assistance.

**14. Has there been any extension to the date that funds cancel and when Treasury sweeps grant funds?**

No, not to date. That is why, for example, the No-Cost Extension for five-year capacity grants is limited to six months to ensure that any and all draw down is completed before the end of the 6th year when funds are swept by Treasury.

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**15. Do I need to submit my full Progress Report to attain a continuation award or attain a No-Cost Extension (NCE)?**

For continuation requests scheduled to come in from **April 1, 2020 to June 16, 2020**, from competitive award projects with planned future support, USDA NIFA accepted a brief, written statement from recipients to verify that they are in a position to:

- 1) resume or restore their project activities; and
- 2) accept a planned continuation award.

The recipient must follow all other continuation related requirements described in the award terms and conditions. USDA NIFA will examine any future need to extend this approach on subsequent continuation award start dates as recipients have an opportunity to assess the situation.

A written statement described above may still be accepted in place of the full progress report; however, this must be approved on a case by case basis. The brief written statements should be submitted to the Program Contact for the award.

To request an extension or with questions about progress reports due prior to this timeframe, recipients must contact USDA NIFA's Awards Management Division to discuss the situation at [awards@usda.gov](mailto:awards@usda.gov) for competitive grants or [capacitygrantquestions@usda.gov](mailto:capacitygrantquestions@usda.gov) for capacity grants.

**16. How do recipients of federally-assisted programs prominently display the “And Justice For All” Civil Rights poster where it can be viewed by customers while adhering to social distancing guidelines?**

The [“And Justice For All” Civil Rights poster](#) is the primary method utilized to inform customers of their rights that displays information relevant to assisted programs, and the versions can be found on the NIFA Website:

- [AD-475A](#): This version is for Federally-Assisted Programs. The language is all inclusive and recipients must display the poster while conducting program delivery.
- [AD-475B](#): This is the Supplemental Nutrition Assistance Program (SNAP) and Food Distribution Program on Indian Reservations (FDPIR) version and should be posted in SNAP and FDPIR offices.

Recipients of federally-assisted programs are required to display this poster in their facilities where it can be viewed by customers. During social distancing, recipients of federally-assisted programs can refer customers to the [NIFA “And Justice for All” poster page](#) or download the image and use them in their presentations or other communications.

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**17. What kinds of COVID-19 related extensions are available for existing grants?**

Type of Extension	Description of Extension
Extension of Reporting Prior to Closeout	<p>USDA NIFA will automatically allow grantees to delay submission of financial, performance and other reports due through <b>June 16, 2020</b> up to 90 days beyond the normal due date. Grantees may continue to draw down Federal funds from the Automated Standard Application for Payments (ASAP) without the timely submission of these reports. However, these reports must be submitted at the end of the postponed period. Additional requests for an Extension of Reporting Prior to Closeout may be reviewed and approved on a <b>case-by-case basis</b>.</p>
No-Cost Extensions	<p>For competitive grants, please check your award <a href="#">Terms and Conditions</a> for information on how to request a No-Cost Extension (NCE).</p> <p>Two-year capacity grants may be allowed up to a one-year extension.</p> <p>Competitive and capacity five-year grants expiring between <b>March 1, 2020 and September 30, 2021</b> may be allowed up to a six-month No-Cost Extension.</p> <p>The period of performance will be extended accordingly.</p> <p>NCE requests will be reviewed on a <b>case-by-case basis</b>.</p> <p>Please email <a href="mailto:awards@usda.gov">awards@usda.gov</a> or <a href="mailto:capacitygrantquestions@usda.gov">capacitygrantquestions@usda.gov</a> at least 6 months prior to the end of your grant performance period if you are interested in exploring whether a no-cost extension is possible.</p> <p>Note: Individual Hatch and Hatch multi-state projects will terminate as scheduled, and new projects will have to be established in the system as applicable.</p>
Extension of Closeout Reporting	<p>USDA NIFA automatically extended the due date for submission of all final project reports, financial reports, and Project Outcomes Reports due through <b>June 16, 2020</b>, by 90 days. Additional requests for Extension of Closeout reporting of up to 6 months may be reviewed and approved on a <b>case-by-case basis</b> for grants.</p> <p>Recipients are reminded that USDA NIFA cannot make any new award or supplement any existing award if the PI or any co-PI(s) has an overdue final report; therefore, it is vital that final reports be submitted by the revised due date.</p>

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To request a No-Cost Extension of time or reporting, recipients must submit their extension request in writing to USDA NIFA's Awards Management Division with a brief explanation of the reasons and plans to complete the project or report in the requested time to

- [awards@usda.gov](mailto:awards@usda.gov) for competitive grants or
- [capacitygrantquestions@usda.gov](mailto:capacitygrantquestions@usda.gov) for capacity grants.

**18. Capacity funds provided under McIntire-Stennis were previously limited by policy to 50% carryover. For carryover from FY20 to FY21, can that carryover limit be raised to 100% due to COVID-19?**

Yes, NIFA will automatically approve up to 100% carryover from FY20 to FY21 for capacity grants using McIntire-Stennis funding. This was a one-time approval due to COVID-19 impacts.

**19. Can we use 1890 Scholarships funding to buy computers, books, pay for tuition, etc., to support students with distance education during the pandemic? I seem to remember that the money can be spent for education. Do recipients (Universities) still need approval from NIFA if the budget has more than 10% change?**

Federal funds awarded for these scholarships must **only** be awarded to Scholars to cover tuition, student fees, room and board, and/or textbooks (or e-books). Based on these eligible expenses all budgeted monies will be in "participant support costs" or "other direct costs" so there should be no need for the grantees to inform us of changes. In general, recipients (Universities) should not spend funds outside these categories. If the University determines that funds need to be used for additional student scholarship support cost (i.e. laptop computers for virtual learning), the Institution must receive written preapproval on a grant by grant basis and the additional coverage category must be made available to all individuals under the Institution's scholarship program and be included in their scholarship policy. Please contact USDA NIFA's Awards Management Division to discuss the situation at [capacitygrantquestions@usda.gov](mailto:capacitygrantquestions@usda.gov) to consult with a grants specialist about your organization's specific circumstances.

**20. Can recipients purchase Personal Protective Equipment (PPE) supplies for faculty, staff, and students supported by capacity grants? Is this an allowable cost?**

These would be allowable costs. If purchasing these supplies would impact the ability to deliver the projects under these grants, then the recipient should consult with a grants specialist.

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**21. Has there been any extension of currently approved indirect cost rates?**

M-20-17 authorized recipients to request an extension on the use of the current rates for one additional year without submission of an indirect cost proposal. Recipients also were authorized to submit a request to its cognizant agency for an extension of the indirect cost rate proposal submission to finalize the current rates and establish future rates.

These flexibilities continue to apply for recipients that requested extensions for the use of current rates or an extension for indirect cost rate proposal on or before **June 16, 2020**.

**22. Is there an extension to single audit requirements?**

Recipients and subrecipients that had not yet filed their single audits with the Federal Audit Clearinghouse as of March 19, 2020 that have normal due dates from **March 30, 2020 through June 30, 2020**, are authorized to delay the completion and submission of the Single Audit reporting package, as required under Subpart F of 2 CFR § 200.501 – *Audit Requirements*, up to six (6) months beyond the normal due date. Audits with normal due dates from **July 31, 2020 through September 30, 2020** have an extension of up to three (3) months beyond the normal due date. No further action by NIFA is required to enact this extension. This extension does not require individual recipients and subrecipients to seek approval for the extension by the cognizant or oversight agency for audit; however, recipients and subrecipients must maintain documentation of the reason for the delayed filing. Recipients and subrecipients who currently qualify as a “low-risk auditee” under the criteria of 2 CFR § 200.520(a), and who take advantage of this extension will continue to qualify as a “low-risk auditee”, absent other reasons for a change in qualification. This flexibility is time limited and will **expire on December 31, 2020**.

Additionally, if applicable, in order to provide adequate oversight of the COVID-19 Emergency Acts funding and programs, recipients and subrecipients must separately identify the COVID-19 Emergency Acts expenditures on the Schedules of Expenditures of Federal Awards and audit report findings.

Recipients should contact their cognizant agency for audit with any questions related to single audit. For USDA NIFA single audit questions, please email [policy@usda.gov](mailto:policy@usda.gov).

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**Gus Schumacher Nutrition Incentive Program (GusNIP) Questions**

**1. Can qualifying purchases made with Pandemic EBT (P-EBT) or Disaster SNAP (D-SNAP) benefits count for the purposes of earning a GusNIP incentive?**

Yes, 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.

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### **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](mailto:awards@usda.gov) to consult with a grants specialist.

**2. Has NIFA received any additional COVID-19 specific funding under any recent appropriations bills?**

No, not at this time.

**3. Do you anticipate the current situation with COVID-19 will affect funding rates next year?**

NIFA does not have any updates related to FY 2021 funding at this time.

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