Good afternoon,

As mentioned at the recent PI meeting, updated guidance on Non-FTE Trainee Extension Exceptions would be issued.

The direct link is within the COVID-19 section of the Sourcebook, at: https://oir.nih.gov/sourcebook/intramural-covid-19-guidance-resources/extension-exceptions-non-fte-trainees-covid-19

Below, I have pasted the same information with a few clarifying points.

**Extension Exceptions for Non-FTE Trainees for COVID-19**

*Revised on September 24, 2020*

Due to the extended nature of the SARS-Cov-2/COVID-19 pandemic the Office of Intramural Research has modified the extension policy for trainees including IRTAs, CRTAs, Visiting Fellows, Research Fellows and Clinical Fellows. This policy is effective immediately. In general, pre-existing mechanisms will be used for requesting extensions with the understanding that requests may require rapid turnaround given these unique circumstances.

**NICHD Procedural Notes:**

- Please contact your Administrative Officer (AO) to let them know if you have a fellow that needs an exceptional extension.
- The AO can advise on their required paperwork and approvals which are still required for these actions.
- If you are not sure about a specific case, please reach out to your AO who can advise or as needed, seek guidance on a particular case.

**Extensions for Postbac IRTA/CRTAs**

- No exceptional approval is needed to extend a second-year postbac for an additional three months beyond their termination date.
- Postbacs seeking a third-year exceptional extension should follow guidance at the OIR Sourcebook Renewals section and should contact their AO for the required NICHD documentation.
  - For more details on this process, please reference this document on the OIR Sourcebook. Questions about this process should be directed to your AO who can liaison.
with the NICHD OD or Dr. Yewon Cheon.

- Postbacs in their third-year who require an extension into a fourth-year given these unique circumstances should email Dr. Sharon Milgram directly for a meeting to discuss their training experience and reason for needing additional time.
  - The request for an extension beyond three-years should be made as soon as possible and at least three-months prior to the termination date.
  - Extensions into a fourth postbac year may be granted for up to one final year and the postbac will be ineligible for employment as a contractor of FTE biologist in the IC following this exceptional extension.

For Predoc IRTA/CRTAs and Visiting Fellows

- Guidance is provided at the OIR Sourcebook in the Renewals sections for Predoc-IRTA/CRTAs and Predoc Visiting Fellows, with the following change -- interviews will not be required for extensions of 6-months or less. Questions about this process should be directed to Dr. Philip Wang.
  - Please keep in mind that extensions beyond a Third Year for Pre-VF is an exceptional request and only 1 year at a time can be processed.
  - For Pre-IRTAs, any extension beyond the 5th year is an exceptional request and only 1 year at a time can be processed. Approvals beyond a 6th year are rare.
  - The lead time for these requests is generally 6 months (except for cases of 6 months or less) so the earlier you know about a fellow needing this type of extension, the better. Please alert your AO.

For Postdoc IRTAs

- IRTAs currently in their 4th to 5th year at NIH may request a 6-month extension past the 5th year without incurring the "no remain or return to NIH for 2 years" condition for entering an exceptional 6th year at NIH. Those requests must be in a memo from the responsible IRP PI, approved by the SD, and sent to Dr. Arlyn Garcia-Perez, who will review, decide and document the decision.
- IRTAs who wish to have a full 6th year must follow existing rules requiring "no remain or return to NIH for 2 years" and these will be processed as they are now.
- IRTAs who are already on an exceptional terminal 6th year at NIH may be considered to receive a further extension up to a full 7th year.
  - This may be granted at the IC Scientific Director level (through your AO) with no further delegations.
  - The 2-year no remain/no return condition remains, but it is pushed to after the new NTE date.
  - Requests for truly exceptional situations beyond a 7th year as a non-FTE (such as for a K99 recipient or change in employment start date as a result of the current situation) may be sent in a memo from the IRP-responsible PI (through your AO) and approved by the
The memo will be sent to Dr. Arlyn Garcia-Perez who will consult the DDIR and OITE as necessary for a final decision.

- For postdoctoral fellows now on their 3rd year or less at NIH, the pandemic impact on their research timeline will be taken into consideration when the time comes (at the end of their 4th year or in their 5th year), for a terminal, **up to 6-month extension**, without incurring the 2-year no remain/no return condition.
  - This exception will be on a case-by-case basis and **will need to be endorsed by the Scientific Director** in a request through your AO and will then be sent for evaluation and approval by OIR for IRTAs.

### For Postdoc Visiting Fellows

- Because of individual immigration histories, Visiting Fellows currently in their 4th to 5th year may **request a 6-month extension** past the 5th year, provided they are **eligible for a G7 J1 visa**, without incurring the "no remain or return to NIH for 2 years" condition for entering an exceptional 6th year at NIH.
  - Those requests must be filed with Division of International Services (DIS), through your AO, and include all the documents necessary as outlined on the [DIS website](#) and any specific IC requirements.
  - The request should be submitted **6-months, but no later than 3-months**, from the program end date to the DIS.

- Visiting Fellows who are **already on an exceptional terminal 6th year at NIH** may be considered to receive a further extension up to a full 7th year (provided the individual's immigration situation allows).
  - The 2-year no remain/no return condition remains, but it is pushed to after the new NTE date. These exceptional extensions continue to require approval by DIS and OIR.
  - Requests for truly exceptional situations beyond a 7th year as a non-FTE (such as for a K99 recipient) may be sent in a memo from the IRP-responsible PI (through your AO) and **approved by the SD**.
  - The request will then be sent to DIS with other required documents as outlined on the [DIS website](#) and any specific IC requirements.
  - The request should be submitted **6-months, but no later than 3-months**, from the program end date to the DIS.

- For postdoctoral fellows now on their 3rd year or less at NIH, the pandemic impact on their research timeline will be taken into consideration when the time comes (at the end of their 4th year or in their 5th year), for a terminal up to 6-month extension without incurring the 2-year no remain/no return condition.
  - This exception will be on a case-by-case basis and **will need to be endorsed by the Scientific Director** in a request through your AO and will then be sent for evaluation and approval by DIS and OIR for VFs.
  - For VFs that require the terminal up to 6-month extension in the G-7 program, the request
should be submitted 6-months, but no later than 3-months, from the program end date to the DIS.

Waivers of the 2-Year No Remain/No Return Condition
For Postdoc IRTAs

- During the pandemic and some recovery period, a waiver of the 2-year no remain/no return condition (incurred by IRTAs who have received >6 months beyond their 5th year as a non-FTE postdoctoral fellow) may be granted by OIR only for individuals for whom the IC has an FTE position (Research Fellow and above).
  - The waiver request should be a memo from the IRP responsible PI, (through your AO) approved by the SD.
  - The request will then be sent to Dr. Arlyn Garcia-Perez.

For Postdoc Visiting Fellows

- The same consideration, as above, will be granted to VFs provided their immigration situation allows.
  - For these VFs, the waiver request should be sent in a memo from the IRP responsible PI, (through your AO) approved by the SD.
  - The request will then be sent to DIS with other required documents as outlined on the DIS website and any IC specific requirements.
  - The waiver request must be submitted 8-months in advance of program end date or as far in advance as possible to avoid or limit a potential pay gap.

The NICHD DIR Administrative Officers, the NICHD DIR Office of Education and the NICHD Acting Scientific Director are ready to assist and, as needed, make these types of requests a priority. The overall goal at NIH and at NICHD is to try to minimize the effects of the pandemic on the non-FTE fellows’ education and training.

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