EXECUTIVE OFFICE OF THE PRESIDENT OFFICE OF MANAGEMENT AND BUDGET WASHINGTON, D.C. 20503

DEPUTY DIRECTOR

FOR MANAGEMENT March 9, 2020

M-20-11

MEMORANDUM FOR THE HEADS OF EXECUTIVE DEPARTMENTS AND AGENCIES

FROM: Margaret Weichert
Deputy Director of Manageme

SUBJECT: Administrative Relief for Recipients and Applicants of Fed ral Financial
Assistance Directly Impacted by the Novel Coronavirus (COVID-19)

The Office of Management and Budget (0MB) has identified the following agency
actions to relieve short term administrative, financial management and audit requirements under 2 CFR 200, Uniform Administrative Requirements, Cost principles and Audit Requirements for Federal Awards, without compromising Federal financial assistance accountability requirements. In accordance with 2 CFR § 200.102, Exceptions, 0MB is allowing Federal agencies to grant class exceptions in instances where the agency has determined that the purpose of the Federal awards is to support the continued research and services necessary to carry out the emergency response related to COVID-19. Further, agencies are reminded of their existing flexibility to issue exceptions on a case-by-case basis in accordance with 2 CFR § 200.102, Exceptions.

The Administration will evaluate if these flexibilities should be extended to recipients
whose operations have been adversely impacted in the emergency response related to COVID-19 at a later date.

Awarding agencies are authorized to take the following actions, as they deem
appropriate, with respect to the administrative provisions that apply to this class of Federal awards. These exceptions are time limited and are only applicable for those awards that support the continued research and services necessary to carry out the emergency response related to COVID-19 during the period formally declared by the Department of Health and Human Services through the 90 Day Public Health Emergency Declaration (Public Health Emergency Period).

1. Flexibility with SAM registration/recertification for applicants.

Awarding agencies can relax the requirement for active SAM registration at time of application in order to expeditiously issue

2. Waiver for Notice of Funding Opportunities (NOFOs) Publication.

Awarding agencies can publish emergency Notice of Funding Opportunities (NOFOs) for less than thirty (30) days without separately justifying shortening the timeframe for each NOFO. Awarding agencies would still be required to document and track NOFOs published for less than thirty (30) days under this emergency waiver.

3. Pre-award costs.

Awarding agencies may allow necessary pre-award costs that are incurred (i) from January 20, 2020 through the Public Health Emergency Period and (ii) prior to the effective date of a Federal award.

4. No-cost extensions on expiring awards.

A warding agencies may extend awards which are active as of March 31, 2020 and scheduled to expire prior or up to December 31, 2020, automatically at no-cost for a period up to twelh

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7. Waivers from prior approval requirements.

Awarding agencies are authorized to waive prior approval requirements as necessary to effectively