

Arizona Department of Administration Office of Grants and Federal Resources

MEMO

March 31, 2020

OMB policy memos in response to COVID-19

The Office of Management and Budget (OMB) has identified the following agency actions to relieve short term administrative, financial management and audit requirements under 2 CFR 200. Federal 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 grant awards.

OMB Memo (M-20-11)

Release Date: March 9, 2020 **Expires:** Does not expire

Scope: Applies to those grant 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).

General Provisions:

- Flexibility with SAM registration for applicants
- Waiver for notice of funding opportunities (NOFO) publication
- Allows pre-award costs
- No-cost extensions on expiring awards
- Abbreviated non-competitive continuation requests
- Expenditure of award funds for salaries and other project activities
- Waivers from prior approval requirements
- Exemption of certain procurement requirements
- Extension of financial and other reporting (3 mo.)
- Extension of Single Audit submission (12 mo.)

OMB Memo (M-20-17)

Release Date: March 19, 2020 Expires: Re-assessed after 90 days

Scope: Provides similar administrative relief listed in M-20-11 to an expanded scope of recipients affected by the <u>loss of operational capacity and increased costs</u> due to the COVID-19 crisis

General Provisions:

- All provisions included under (M-20-11) except for pre-award costs
- Adds flexibility with application deadlines
- Allowability of costs not normally chargeable to awards (e.g. cancellation of events, travel)
- Extension of currently approved indirect cost rates
- Extension of closeout (up to 12 mo.)
- Extension of Single Audit submission (6 mo.)

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