

	<b>OMB M-20-11 Administrative Relief for Recipients and Applicants of Federal Financial Assistance Directly Impacted by the Novel Coronavirus (issued March 9, 2020)</b> <ul style="list-style-type: none"> <li>Created for awards that support continued <u>research and services necessary to carry out the emergency response related to COVID-19</u></li> <li>Requirements active until memo is revoked by OMB</li> </ul>	<b>OMB 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 (issued March 19, 2020)</b> <ul style="list-style-type: none"> <li>Expands the scope of M-20-11 to include <u>recipients affected by the loss of operation capacity and increased costs due to the COVID-19 crisis (all grants)</u>.</li> <li>Will expire in 90 days (mid-June) but OMB will be revisiting and may extend</li> </ul>
<b>Flexibility with SAM Registration (2 CFR § 200.205)</b>	Federal awarding agencies can relax the requirement for active SAM registration at time of application	Same but also states that current (active) SAM registrants that expire before May 16, 2020 will be given an automatic one-time 60 day extension.
<b>Flexibility with Application Deadlines (2 CFR § 200.202)</b>	Not included in M-20-11.	Awarding agencies may provide flexibility with regard to application submissions; federal agencies may extend deadlines due to circumstances.
<b>Waiver for Notice of Funding Opportunities (NOFO) Publication (2 CFR § 200.203)</b>	Federal agencies can publish emergency NOFOs for less than 30 days; allows for quick turnaround.	Same as M-20-11 but specifies this is for competitive grants and cooperative agreements.
<b>Authorization of Pre-Award Costs</b>	Awarding agencies may allow necessary pre-award costs incurred from January 20, 2020 through the Public Health Emergency Period; also prior to the effective date of a federal award	Not included in M-20-17.
<b>No-Cost Extensions on Expiring Awards (2 CFR § 200.308)</b>	Awarding agencies may extend awards that are active (as of March); have to request the extension with your federal awarding agencies.	Same as M-20-11 but limited to the extent permitted by law. Awarding agencies “ <i>can use a brief statement and plan from a recipient</i> ” as documentation to award second year funds and beyond, agencies must specify requirements.
<b>Abbreviated Non-Competitive Continuation (2 CFR § 200.308)</b>	Non-competitive continuation requests (a brief statement from grantee) from April 1 - December 31, 2020 can be accepted from grantees.	Same as M-20-11 but “non-competitive” is listed in title (not in text of memo).
<b>Expenditure of Funds for Salaries and Other Costs (2 CFR § 200.403-405)</b>	Awarding agencies have discretion to allow recipients to continue charging salaries and benefits to current/active awards (but recipients must have policy addressing this); agencies may allow other costs to be charged to federal awards (including those necessary to resume activities supported by the award). Awarding agencies may also evaluate the recipient’s ability to resume the project in the future.	Same as M-20-11 but also includes awarding agencies requiring recipients to maintain appropriate records and cost documentation (2 CFR 200.302 and 200.333).

<b>Allowability of Costs Not Normally Charged (2 CFR § 200.403-405)</b>	Not included in M-20-11.	<ol style="list-style-type: none"> <li>Awarding agencies may allow recipients who incur costs related to cancelled event, travel, or other activities necessary and reasonable for the performance of the award, or the pausing and restarting of grant funded activities due to COVID, to charge these costs to their award without regard to 2 CFR 200.403 - 405.</li> <li>Awarding agencies may allow recipients to charge full cost of any cancellations under the grant however recipients should not assume additional funds will be available should the charging of cancellation result in a shortage of funds. Manage award at same cost (i.e. you will not get extra money).</li> </ol> <p><b>NOTE:</b> Make sure you have documentation (emails, guidance from funder, OMB M-20-17, etc.)</p>
<b>Waivers from Prior Approval Requirements (2 CFR § 200.407)</b>	Awarding agencies can waive prior approval requirements as necessary to address the COVID crisis. All costs must be consistent with terms of the award and federal cost guidelines (except where specified in this memo)	Same as M-20-11.
<b>Exemption of Certain Procurement Requirements (2 CFR § 319(b) and 2 CFR § 200.321)</b>	Awarding agencies may waive the geographical preferences requirement (2 CFR 200.319(b)) and contracting with small and minority owned business, women's business enterprises, etc. (2 CFR 200.321)	Same as M-20-11.
<b>Extension of Financial and Other Reporting (2 CFR § 200.327-328)</b>	Awarding agencies may allow recipients to delay submission of financial and other reports up to 3 months beyond the normal due date. Recipients may continue to draw down federal funds.	Same as M-20-11 plus awarding agencies may waive requirement that recipients notify the awarding agency of any problems, delays or adverse conditions related to COVID-19 on a grant by grant basis (2 CFR 200.328(d)(I)).
<b>Extension of Currently Approved Indirect Cost Rate (2 CFR § 200.414(c))</b>	Not included in M-20-11.	Grantees can continue to use the currently approved indirect cost rate for up to 1 year but must ask the awarding agency for an extension (without submission of a new indirect cost proposal). Federal agencies may also approve the recipient's request for an extension of the ICR proposal submission to finalize the current rates and establish future rates.
<b>Extension of Closeout (2 CFR § 200.343)</b>	Not included in M-20-11.	Awarding agencies may allow recipients to delay submission of pending financial, performance or other reports required at the end of an award for up to one year after the award expires. Recipient has to notify the federal agency of the reporting delay.
<b>Extension of Single Audit Submission (2 CFR § 200.512)</b>	Recipients can delay submission of the Single Audit up to 12 months beyond the normal due date; recipients would still be considered "low-risk" even with the delay in submission.	If a recipient or subrecipient has not filed a Single Audit with the Federal Clearinghouse with a fiscal year ending through June 30, 2020, a 6 month delay beyond the normal due date is allowed. Recipients and subrecipients do not need to seek approval for the extension by the cognizant or oversight agency for the audit; however should maintain documentation for reason for the delayed filing. Recipients and subrecipients still qualify as a "low-risk auditee" under 2 CFR § 200.520(a).