



**Summary of OMB Memo 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**

The Office of Management and Budget (OMB) issued M-20-17 (<https://rsp.wisc.edu/COVID.cfm>) on March 19, 2020. The Memo provides Federal agencies a number of flexibilities with regard to administration of grants and cooperative agreements. Agencies may apply these flexibilities to recipients affected by the COVID-19 crisis. OMB indicates that agencies have a limited time to take advantage of these flexibilities and provide a 90-day window to do so, at which time OMB will reassess. This memo grants authority to agencies to allow flexibilities, but it does not require them to provide flexibilities.

In the absence of agency flexibilities as per this Memo (or other guidance), the existing terms and conditions of the award apply. For example, two Department of Defense operating units have issued guidance that is not consistent with this Memo. Another point to note is that certain parts of this guidance (ending in 200.2\_ or 200.3\_) do not apply to Federal contracts and subcontracts, because administrative requirements for contracts are not governed by 2 CFR 200.

Federal agencies may take actions that include the following, as “they deem appropriate and to the extent permitted by law.” This list is not all inclusive, and a copy of the full Memo is attached.

- **Proposal deadlines:** Agencies may provide flexibility with application deadlines. This includes submission of applications in response to specific announcements, as well as unsolicited proposals. Agencies are advised to list specific guidance on their websites and/or provide an agency point of contact. Additionally, agencies may publish emergency Notice of Funding Opportunities for less than thirty (30) days, resulting in a very quick turnaround for these proposals.
- **No-cost extensions:** Agencies may, to the extent permitted by law, automatically allow no-cost extensions for up to twelve (12) months for awards that are active as of March 31, 2020 and scheduled to end on or before December 31, 2020. If such an extension is allowed, financial and performance reports will be due 90 days following the end date of the extension.
- **Non-competitive continuation requests:** For continuation requests scheduled to be submitted between April 1, 2020 and December 31, 2020, agencies may accept a brief statement from recipients in lieu of normal requirements. The statement serves to verify that the recipient is in a position to resume or restore project activities and accept a continuation award.
- **Allowability of salaries and other costs:** Agencies may allow recipients to continue charging salaries consistent with institutional policy regarding paying salaries under unexpected or extraordinary circumstances from all funding sources, both Federal and non-Federal. Agencies may also allow recipients to charge costs associated with cancelled events, travel, or other activities, in

addition to costs associated with pausing and restarting the award. Recipients must be made aware that additional funds may not be available should such charges result in a shortage of funds. For all charges, recipients must maintain appropriate records and cost documentation.

- **Prior approval requirement waivers:** Agencies are authorized to waive prior approval requirements as necessary, including for revisions of budget and program plans.
- **Interim reports:** Agencies may allow delays in submission of financial, performance, and other reports up to three (3) months beyond the normal due date. This flexibility also enables agencies to waive the requirement for recipients to notify the agency on a grant-by-grant basis of problems, delays, or adverse conditions related to COVID-19.
- **Extension of closeout:** Agencies may allow delays in submission of financial, performance, and other reports required at the time of award closeout for up to one year after the award expires. The recipient must notify the agency about any reporting delays.

**Reminder: It is important to remember that each Agency will need to take specific actions to put these flexibilities in place.** UW-Madison will join with university associations to urge that these actions, in their entirety, are implemented immediately.