U.S. Department of the Interior, Office of Grants Management Policy Advisory Notes DOI-PGM-PAN FINAL DOCUMENT

DOI-PGM-PAN Reference No: 0005

Notification Date: March 20, 2020

Purpose: The purpose of this policy advisory note (PAN) is to inform the financial assistance community on the Administrative Relief for Recipients and Applicants of Federal Financial Assistance Directly Impacted by the Novel Coronavirus (COVID-19).

Summary:

On March 9, 2020, The Office of Management and Budget (OMB) issued M-20-11, Administrative Relief for Recipients and Applicants of Federal Financial Assistance Directly Impacted by the Novel Coronavirus (COVID-19) to allow 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.

OMB has identified several 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.

As program managers are considering administrative relief, they should be prudent in their stewardship of Federal resources which includes giving consideration to potential offsets-e.g. reduction in training and travel.

On March 19, 2020, OMB issued 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, to expand the scope of the recipients affected by the loss of operational capacity and increased costs due to the COVID-19 crisis.

Background and Discussion:

OMB is allowing Federal agencies to grant class exceptions in instances where the agency has determined that the purpose of the Federal award is to support the continued research and services necessary to carry out emergency responses related to COVID-19. Currently, administrative relief listed in M-20-11 has expanded the scope of recipients affected by the loss of operational capacity and increased costs due to the COVID-19 crisis. These exceptions are time limited and went into effect on January 31, 2020 and will be reassessed by OMB within 90 days of the issuance of OMB Memo M-20-17 on March 19, 2020.

Additionally, DOI requires bureaus and offices to establish adequate reporting and monitoring controls to ensure proper oversight for programs for which one or more of these exceptions apply. The controls should reduce and address any program risks posed by the relaxing of the administrative requirements.

The Office of Grants Management (PGM) will be issuing further guidance and compiling a list of FAQ's.

For any questions regarding the above administrative relief provisions, please contact Xanthia James, Grants Management Specialist at (202) 513-0688 or via email at xjames@ios.doi.gov.