

Chart Describing Applicability of OMB Memo M-20-17 to FEMA Grant Programs

OMB Class Exceptions	Explanation	Applicability to FEMA Programs	
		Non-Disaster Grants *	Disaster Grants *
1. Flexibility with SAM Registration	SAM registrations expiring before May 16, 2020 will be afforded one-time 60-day extension. GSA is executing. Applicants not previously registered must still register.	Yes	Yes
2. Flexibility Application Deadline	FEMA may provide flexibility with regard to the submission of competitive applications in response to specific announcements, as well as unsolicited applications.	Yes, pursuant to program discretion.	Yes, pursuant to program discretion.
3. Waiver for NOFO Publication	For competitive programs, would allow FEMA to publish emergency NOFOs for less than 30 days without having to individually justify it. Would result in short application period.	FEMA not invoking at this time.	N/A
4. No-cost Extensions on Expiring Awards	Subject to statutory limitations, allows FEMA to extend POP deadlines by 12 additional months for awards that are open as of 3/31/20 & are set to expire on or before 12/31/20 to allow time for recipient assessments, resuming individual projects, and submitting reports.	Yes, extension requests can be made pursuant to the conditions outlined in the award and FEMA will provide flexibilities to approve those requests to the greatest extent possible.	Yes, extension requests can be made pursuant to the conditions outlined in the award and FEMA will provide flexibilities to approve those requests to the greatest extent possible.

* If you are uncertain whether your grant(s) is a non-disaster or disaster grant, contact your respective grant program office for clarity.

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5. Abbreviated Noncompetitive Continuation Requests	Applies to continuation requests scheduled to arrive between 4/1/20 and 12/31/20. Only applies to continuation awards, and FEMA does not make continuation awards	N/A	N/A
6. Allowability of Salaries & Other Project Activities	FEMA will allow recipients to charge salaries and other costs to the award necessary to resume activities under the award or costs related to interruption of operations or services.	Yes. Recipients and subrecipients are required to maintain appropriate records and cost documentation.	Yes. Recipients and subrecipients are required to maintain appropriate records and cost documentation.
7. Allowability of Costs Not Normally Chargeable to Awards	FEMA will allow recipients to charge costs to the award related to the cancellation of events, travel, or other activities necessary and reasonable for the performance of the award, or the pausing and restarting of grant funded activities due to the public health emergency, to charge these costs to their award without regard to certain Cost Principle provisions on reasonability, allowability, and allocability.	Yes. Must enquire with program for allowable cost/activities. Recipients and subrecipients are required to maintain appropriate records and cost documentation.	Yes. Must enquire with program for allowable cost/activities. Recipients and subrecipients are required to maintain appropriate records and cost documentation.
8. Prior Approval Requirement Waivers	FEMA may waive prior approval requirements identified in 2 C.F.R. § 200.407 as necessary to effectively address the response.	Prior approval requirements will be waived on a program-by-program basis by the specific grant program offices at their discretion.	Prior approval requirements will be waived on a program-by-program basis by the specific grant program offices at their discretion.

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9. Exemption of Certain Procurement Requirements	FEMA will waive the prohibition in the procurement standards on geographic preferences under 2 C.F.R. § 200.319(b) and requirement that recipients take certain socioeconomic steps under 2 C.F.R. § 200.321.	Yes	Yes
10. Extension of Financial, Performance & Other Reporting	FEMA may allow recipients to delay submitting reports up to 3 months beyond the normal due date. But the reports must be submitted at the end of the postponed period. FEMA is waiving the requirement for recipients to notify the agency of problems, delays, or adverse conditions related to COVID-19. Recipients should nonetheless document such problems, delays, or adverse conditions related to COVID-19 in their internal grant files.	Yes	Yes
11. Extension of Currently Approved Indirect Cost Rates	Where FEMA is the cognizant agency for indirect costs FEMA will approve recipient requests for an extension on the use of current indirect cost rates for one additional year without submission of an indirect cost proposal and may provide other related relief	Yes, if non-federal entity is impacted by COVID-19. This class exception is not applicable to specific grant programs, but rather applies to the small number of certain non-federal entities where FEMA is the cognizant agency for indirect cost.	

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12. Extension of Closeout	For recipients unable to meet original closeout due dates, FEMA will allow a recipient to delay submission of any pending closeout reports for expired projects, provided the recipient provides proper notice about the reporting delay. The delay may not exceed six months. Notably, it does <u>not</u> provide class extension of liquidation deadlines.	Yes	Yes
13. Extension of Single Audit Submission	Where FEMA is the cognizant or oversight agency for audit, it will allow recipients and subrecipients that have not yet filed their Single Audits as of March 17, 2020, and that have fiscal year-ends through June 30, 2020, to delay completing and submitting the Single Audit reporting package by 6 months.	Yes, if non-federal entity is impacted by COVID-19. This class exception is not applicable to specific grant programs, but rather applies to the small number of certain non-federal entities where FEMA is the cognizant agency or oversight agency for audit.	