BACKGROUND

The Office of Management and Budget (OMB) issued memo (M-20-17) on March 17, 2020 to federal agencies that provided **90-day temporary flexibilities** (through June 16, 2020) to federal grants impacted by COVID-19. Most federal agencies issued policies to provide these flexibilities to their grantees. These flexibilities included allowing institutions to charge salary and benefits to federal grants consistent with the recipient institution's policy for salary continuation.

These flexibilities must be documented on the <u>COVID-19 Central Office Request Form</u> by the Principal Investigator (PI) or designee and submitted through the SeRA system. This information will be used to respond to sponsor inquiries or audits. If you are continuing salary on your federal award for individuals unable to work and you have not yet submitted a form indicating that you are doing so, PLEASE do so immediately

UPDATED GUIDANCE AND NEW REQUIREMENTS

On June 18, 2020, OMB issued a memo (M-20-26) which extends some but not all of the flexibilities in the earlier memo. In addition, this OMB memo contains new requirements for federal awards.

New Requirements for Salary Continuation (June 18 through August 31, 2020)

Federal agencies can continue to allow charging of salary and benefits to federal grants consistent with the recipient institution's policy for salary continuation, which for Stanford is August 31, 2020. The OMB extension also includes a new requirement that recipients **must first** *"exhaust other available funding sources to sustain the workforce and implement necessary steps to save overall operational costs"*.

To meet this new requirement, PIs and their departments must work with their ORA or RMG contact to document their efforts to exhaust other available funding sources and reduce operational costs. In addition, the COVID-19 Central Office Request Form must be completed.

Flexibilities Not Extended by OMB 20-26

Additional flexibilities provided in the original OMB memo have <u>not</u> been extended beyond June 16th (e.g. ability to file late progress reports, late proposal submissions, recovery of travel cancellation fees).

Additional Guidance

The federal agencies (NIH, NSF, etc.) are beginning to announce guidance around these new requirements. NSF guidance can be found <u>here</u>, the NIH guidance can be found <u>here</u>. This information is also available on the ORA <u>Government Sponsor COVID-19 website</u> and the RMG <u>website</u>. We will continue to update the community as more information becomes available.

As previously communicated, it's extremely important that PIs and their research teams continue to document research progress towards project goals and the resulting impact of COVID-19.

If you have questions, please contact your Institutional Official in <u>ORA</u> or <u>RMG</u>.