COVID-19 Attachment 2: DOE-NNSA Implementation of OMB Memorandum M-20-17

DOE Implementation of OMB Memorandum M-20-17, entitled, "Administrative Relief for Recipients and Applicants of Federal Financial Assistance Directly Impacted by the Novel Coronavirus (COVID-19) due to Loss of Operations" dated March 19, 2020

The purpose of this guidance is to implement flexibilities authorized by Office of Management and Budget (OMB) Memorandum M-20-17 from specific administrative, financial management, and audit requirements contained in 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards, without compromising accountability requirements.

Please note that, pursuant to OMB guidance, <u>these administrative relief flexibilities are</u> <u>intended to be time limited</u>. OMB plans to reassess their applicability within 90 days and DOE will update our guidance, as needed, at that time. Except where noted below, the following flexibilities are applicable to DOE applicants and awardees affected by the loss of operational capacity and increased costs due to the COVID-19 crisis. DOE COs and recipients are reminded of the requirement to maintain appropriate st(2 CFR §

03)

DOE will determine if publication of emergency FOAs for less than 30 days is needed due to the COVID-19 crisis on a case by case basis. COs should work with their Program Offices to determine if a shortened publication time for a FOA is needed and provide the appropriate file documentation.

4. No-cost extensions on expiring awards. (2 CFR §200.308)

Recipients must notify the CO if it is utilizing thegulatory authorities in 2 CFR 200.308(d)(2) to implement ano-cost extension to itsward The CO will then issue a modification to the award to change the expiration dat COs are authorized to provide roostextensions to current awards which were actives of March 31, 2020 and scheduled to expire on or before December 31, 2020. COs are also authorized to extend awards which recipients have alady utilized the onetime extension provided in 2 CFR 200.308(d)(2). A determination for room petitive federal financial assistance as required by 2 CFR 910.126 will not properly document the award when making the modifications to the expiration date.

5. Abbreviated non-competitive continuation requests. (2 CFR §200.308)

Recipiens with