



March 20, 2020

TO: Recipients of OASH Grants and Cooperative Agreements

FROM: Scott Moore  
Director, Grants & Acquisitions Management

SUBJECT: Administrative Relief for Recipients of Federal Financial Assistance  
Directly Impacted by the Novel Coronavirus (COVID-19) due to Loss of  
Operations

On March 19, 2020, the Office of Management and Budget (OMB) issued administrative relief guidance for recipients and applicants of federal financial assistance as federal awarding agencies continue to address recipients and applicants directly impacted by COVID-19 due to loss of operations. The new memorandum contains guidance that expands upon that contained in OMB Memorandum M-20-11. The Office of the Assistant Secretary for Health (OASH), Grants and Acquisitions Management (GAM) Division is exercising its delegated discretion as described below.

Effective as of the date of our memorandum, recipients of grants and cooperative agreements managed by OASH GAM, which include awards for the Office of Population Affairs (OPA), the HHS Office of Minority Health (OMH), the HHS Office on Women's Health (OWH), and the Office of Research Integrity (ORI), are granted the waivers below until the public health emergency ends but not to exceed 90-days.

**1. Allowability of salaries and other project activities.**

Recipients may continue to charge salaries and benefits to the currently active Federal award consistent with the recipients' policy of paying salaries (under unexpected or extraordinary circumstances) from all funding sources, Federal and non-Federal. Recipients may charge other costs necessary to resume activities supported by the award, consistent with applicable Federal cost principles and with benefit to the project. Recipient's ability to resume the project activity in the future and the appropriateness of future funding, will be evaluated based on subsequent progress reports and other communications with the grantee. Recipients must maintain appropriate records and cost documentation as required by 2 CFR § 200.302 -Financial management and 2 CFR § 200.333 -Retention requirement of records to substantiate the charging of any salaries and other project activities costs related to interruption of operations or services. *Recipients should not assume additional funding will be available if the charges for salaries or other project activities result in an overall shortage of funds to eventually complete the full project.*

**2. Allowability of Costs not Normally Chargeable to Awards.**

Recipients may charge to their award costs 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. Recipients may charge the full cost of cancellation when the event, travel, or other activities are conducted under the auspices of the grant. Recipients must maintain appropriate records and cost documentation as required by 2 CFR § 200.302 -Financial management and 2 CFR § 200.333 -Retention requirement of records to substantiate the charging of any cancellation or other fees related to interruption of operations or services. *Recipients should not assume additional funding will be available if the charges for cancellation or other fees result in an overall shortage of funds to eventually carry out the event or travel.*

**3. Prior Approvals**

Recipients able to modify temporarily their activities to accomplish program goals must submit a change in scope request through Grant Solutions and receive prior approval from the Grants Management Officer. A request specifically stating that the change is temporary and a result of COVID-19 impacts will not require a subsequent change in scope when the public health emergency ends. The project scope will automatically revert to the previously approved project. Recipients unable to conduct award activities during the public health emergency do not need to submit a change in scope request or budget revision request. Recipients unable to conduct award activities must notify the grant management specialist (GMS) and federal project officer (FPO) on their most recent Notice of Award (NOA) that the cessation of award activities has occurred. This notification may be through either a grant note in Grant Solutions or an email addressed to both the GMS and FPO. Recipients who have ceased project activities do not require prior approval to return to or resume project activities. Recipients will be responsible for reporting the specific COVID-19 impacts that led to any cessation of project activities in their progress reports for the period of covered by the report.

*Recipients should not assume that additional funding will be available to complete the offset the impacts of COVID-19 on the ability to resume or complete the project when it is safe to resume project activities.*

Please direct any questions to your assigned GMS and FPO. You may also email [OASH\\_Grants@hhs.gov](mailto:OASH_Grants@hhs.gov).