



Chart Describing Applicability of OMB Memo M-20-11 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 5/16/20 are being extended by GSA for 60 days. Applicants not previously registered are still requested to register before application deadlines.	Yes	Yes
2. Waiver for NOFO Publication	FEMA may publish emergency NOFOs for less than 30 days without having to individually justify it. Would result in short application period.	Yes, on a program-by-program basis.	N/A
3. Pre-award Costs	FEMA may allow necessary pre-award costs incurred from 1/20/20 through the Public Health Emergency Period and prior to the effective date of award.	Yes, on a program-by-program basis.	Yes, on a program-by-program basis.

* Exceptions are available only for awards made for the purpose of supporting the continued research and services necessary to carry out the emergency response related to COVID-19. As of the date of publication, these are awards made pursuant to the CARES Act for Assistance to Firefighters Grants (AFG), Emergency Management Performance Grants (EMPG), and Emergency Food and Shelter Program (EFSP) (“Non-disaster Grants”), and Public Assistance Category B Emergency Protective Measures made under COVID-19 emergency and major disaster declarations and IA programs available under COVID-19 major disaster declarations (“Disaster Grants”). Subsequent supplemental appropriations for COVID-19 may result in additional programs being eligible for the exceptions.

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4. No-cost Extensions on Expiring Awards	Subject to statutory limitations, allows FEMA to extend period of performance deadlines by 12 additional months for awards that are open as of 3/31/20 and are set to expire on or before 12/31/20 to allow time for recipient assessments, resuming individual projects, and submitting reports.	No, FEMA has no awards that fall within the allowance.	No, FEMA has no awards that fall within the allowance.
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	Yes
7. 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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8. 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
9. Extension of Financial and Other Reporting	FEMA will allow recipients to delay submitting reports up to 3 months beyond the normal due date; reports must be submitted at the end of the postponed period.	Yes	Yes
10. Extension of Single Audit Submission	Agencies may allow recipients to delay audits for 12 months. However, under M-20-17, FEMA already allowed that where it 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 has received a COVID-19 related award. 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.	