CSREES-USDA Policy Guidance Hurricanes Katrina and Rita Administrative Relief for Federal Awards October 17, 2005

The U.S. Office of Management and Budget (OMB) issued a <u>policy statement on September 30, 2005</u> regarding administrative relief for grantees impacted by Hurricanes Katrina and Rita. This policy statement was developed in conjunction with the Federal agencies, as well as the Office of Science and Technology Policy (OSTP), for the purpose of coordinating activities that will assist grantees, where possible, in resuming the operations of the grantee organizations, particularly in the performance of Federal program objectives. OSTP also issued a <u>policy statement on October 5, 2005</u>.

OMB has identified the following agency actions to relieve short term administrative and financial management requirements under OMB grant circulars (A-21, A-87, A-102, A-110, and A-122), without compromise to the grantee accountability requirements. These steps are being implemented consistently, as appropriate, across all of the Federal agencies, for grantees located in a county or parish affected by Hurricanes Katrina and Rita. Below are the OMB/OSTP actions for administrative relief as well as the Cooperative State Research, Education, and Extension Service (CSREES) implementation of these relief actions:

1. Flexibility with application deadlines.

Government-wide Language: Agencies may provide flexibility with regard to the submission of competing applications in response to specific announcements, as well as unsolicited applications. Investigators and institutions are advised to consult agency specific guidance on their hurricane relief web sites, and/or consult with individual agency program officers on future or more specific application deadlines.

<u>CSREES Implementation</u>: Any applications submitted after a deadline will be handled on a case-by-case basis. Applicants located in the designated Disaster Area who are unable to submit on or prior to an established deadline are encouraged to submit as soon thereafter as is reasonably possible. Late applications from such applicants will be considered to the extent practicable. This flexibility will remain in place until December 31, 2005. Any applicant that will submit after a deadline is encouraged to contact the Program Contact identified in Part VII of the applicable request for applications (RFA) to alert him/her to the late application submission. RFAs are available through the <u>CSREES Website</u>.

2. No-cost extensions on expiring awards.

Government-wide Language: To the extent permitted by law, agencies will extend awards that are active as of August 31, 2005, and scheduled to expire prior or up to December 31, 2005, automatically at no-cost for a period up to twelve (12) months. This will allow time for assessment and, hopefully, the resumption of many individual projects, and a report on program progress and financial status to agency staff. Project-specific financial and performance reports will be due 90 days following the end date of the extension. Agencies will examine the need to extend other project reporting as the requirement arises.

<u>CSREES Implementation</u>: CSREES will send a letter to the Authorized Organizational Representative notifying the award institution of an automatic extension. A listing of awards extended under this guidance will be made available on the CSREES website by October 31, 2005.

If you have questions regarding the extension of an award, please contact:

Carol Langguth, Branch Chief, Awards Management Branch, CSREES-USDA, Stop 2271, 1400 Independence Avenue, SW, Washington, DC, 20250-2271, telephone: (202) 401-4986, or via e-mail to awardsdisaster@csrees.usda.gov.

3. Abbreviated continuation requests.

Government-wide Language: For continuation requests, or progress reports scheduled to come in from August 31 to December 31, 2005, from projects with planned future support, agencies will accept a brief statement from grantee organizations to verify that they are in a position to: 1) resume or restore their project activities, and 2) to accept a planned continuation award. Agencies will examine the need to extend this approach on subsequent continuation award start dates as grantee organizations have an opportunity to assess the situation.

<u>CSREES Implementation</u>: For continuation awards that are eligible to receive the next increment of funding between August 31 and December 31, 2005, the applicable institution should provide a brief statement on the degree of project destruction that was incurred by the hurricane and a brief statement on how they intend to proceed given the circumstances. The brief statement should be submitted to the programmatic contact identified in the award document (i.e., Block 12. of Form CSREES-2009, Award Face Sheet). The CSREES programmatic contact will make a funding recommendation based on the brief statement and the availability of funding. In the event the programmatic contact information is not accessible, the brief statement should be submitted to:

Carol Langguth, Branch Chief, Awards Management Branch, CSREES-USDA, Stop 2271, 1400 Independence Avenue, SW, Washington, DC, 20250-2271, telephone: (202) 401-4986, or via e-mail to awardsdisaster@csrees.usda.gov.

4. Expenditure of award funds for salaries and other project activities.

Government-wide Language: Salaries and benefits and stipends may continue to be charged to currently active research, training, and fellowship awards consistent with the grantee organization's policy of paying salaries (under unexpected or extraordinary circumstances) from all funding sources, Federal and non-Federal. Other costs may be charged to Federal awards, including those necessary to resume activities supported by the award, consistent with applicable Federal cost principles and the benefit to the project. Federal agencies may also evaluate the grantees ability to resume the project activity in the future and the appropriateness of future funding, as done under normal circumstances–based on subsequent progress reports and other communications with the grantee.

<u>CSREES Implementation</u>: CSREES supports the above government-wide policy. If you have questions regarding this guidance, contact:

Carol Langguth, Branch Chief, Awards Management Branch, CSREES-USDA, Stop 2271, 1400 Independence Avenue, SW, Washington, DC 20250-2271, telephone: (202) 401-4986, or via e-mail to <u>awardsdisaster@csrees.usda.gov</u>.

5. Prior approval requirement waivers.

Government-wide Language: Requirements for agency prior approval for the re-budgeting of funds within the scope of the project and automatic carryover of unspent balances are waived for currently active awards issued prior to September 30, 2005. As in item four above, all costs charged to Federal awards must be consistent with Federal cost policy guidelines and the terms of the award. Final charges must also reflect offsets of all recoveries from other parties (e.g., insurance, FEMA).

<u>CSREES Implementation</u>: Awardees should refer to the applicable award terms and conditions for guidance regarding re-budgeting waivers (see <u>http://www.csrees.usda.gov/business/awards/awardterms.html</u> to view CSREES award terms and conditions). If you have questions about re-budgeting waivers or need to request a waiver, please contact:

Carol Langguth, Branch Chief, Awards Management Branch, CSREES-USDA, Stop 2271, 1400 Independence Avenue, SW, Washington, DC, 20250-2271, telephone: (202) 401-4986, or via e-mail to awardsdisaster@csrees.usda.gov.

6. Extension of financial and other reporting.

Government-wide Language: Institutions may delay submission of Federal cash transaction reports on currently active award accounts up to three (3) months beyond the normal due date. See agency-specific directions found on their web sites. However, these reports must be submitted at the end of the postponed period. Institutions may request extensions, as necessary, on other grantee financial and administrative reports, such as the property and invention reports.

<u>CSREES Implementation</u>: Requests for extensions on the submission of the Form SF-272, Federal Cash Transactions Report, should be made to:

Philip Sue-Ling, Team Leader, Funds Management Section, Office of Extramural Programs, CSREES-USDA, Stop 2298, 1400 Independence Avenue, SW, Washington, DC, 20250-2298, telephone: (202) 401-1302, or via e-mail at psueling@csrees.usda.gov.

These requests will be coordinated with staff at the Department of Health and Human Services' Payment Management System (DHHS-PMS).

Requests for extensions of time in submitting final SF-269's, Financial Status Reports, (i.e., those due between June 1, 2005, and December 31, 2005) may be granted an additional 90 days. These requests also should be submitted to Mr. Sue-Ling.

Requests for extensions of time for invention reports should be submitted to:

Robert MacDonald, Information Technology Policy Leader, Information Systems and Technology Management, CSREES-USDA, Stop 2216, 1400 Independence Avenue, SW,

Washington, DC, 20250-2216, telephone: (202) 205-5967, facsimile: (202) 720-0857, or via e-mail at <u>rmacdonald@csrees.usda.gov</u>.

7. Extension of currently approved indirect cost rates.

Government-wide Language: Agencies may allow grantees to continue to use the currently approved indirect cost rates (i.e., predetermined, fixed, or provisional rates) to recover their indirect costs on Federal awards, if an extension is required. In these cases, institutions may request an extension of the current rate(s) for one additional year without submission of an indirect cost proposal from their cognizant agency. Agencies may also approve grantee requests for an extension of the indirect cost rate proposal submission to finalize the current rates and establish future rates.

<u>CSREES Implementation</u>: CSREES will allow grantees to continue the use of the currently approved indirect cost rate to recover their indirect costs on CSREES awards for not more than one additional year. If you need to request other extensions of indirect cost rates, please contact:

Carol Langguth, Branch Chief, Awards Management Branch, CSREES-USDA, Stop 2271, 1400 Independence Avenue, SW, Washington, DC, 20250-2271, telephone: (202) 401-4986, or via e-mail to <u>awardsdisaster@csrees.usda.gov</u>.

8. Extension of closeout.

Government-wide Language: Institutions may postpone submission of any pending financial, performance and other reports required by the terms of award for the closeout of expired projects by providing proper notice based on instructions on agency-specific web sites. This delay in submitting closeout reports may not exceed one year after the award expires.

<u>CSREES Implementation</u>: For awards that expired between June 1 and December 31, 2005, the final financial and technical reports may be extended for an additional 90 days upon request.

Requests for extension of the submission of any final financial reports should be made to:

Philip Sue-Ling, Team Leader, Funds Management Section, Office of Extramural Programs, CSREES-USDA, Stop 2298, 1400 Independence Avenue, SW, Washington, DC, 20250-2298, telephone: (202) 401-1302, or via e-mail at psueling@csrees.usda.gov.

Requests for the extension of the submission of any pending final technical reports should be made to the Program Contact identified in the award (i.e., Block 12 of Form CSREES-2009, Award Face Sheet). In the event the programmatic contact information is not accessible, the request should be submitted to:

Carol Langguth, Branch Chief, Awards Management Branch, CSREES-USDA, Stop 2271, 1400 Independence Avenue, SW, Washington, DC, 20250-2271, telephone: (202) 401-4986, or via e-mail to <u>awardsdisaster@csrees.usda.gov</u>.

9. Alternatives for record retention and cost documentation.

Government-wide Language: Institutions can substitute copies of original records, as permitted under OMB Circular A-110. Agencies should be able to help grantees reconstruct the supporting project documentation, with copies of the records that are maintained by the agencies, such as indirect cost proposals, cost allocation plans, and past financial status reports.

<u>CSREES Implementation</u>: Grantees are permitted to substitute copies of original award records on an as needed basis. Requests for award documentation maintained by CSREES should be made to:

Carol Langguth, Branch Chief, Awards Management Branch, CSREES-USDA, Stop 2271, 1400 Independence Avenue, SW, Washington, DC, 20250-2271, telephone: (202) 401-4986, or via e-mail to awardsdisaster@csrees.usda.gov.

If an institution (located in a parish or county impacted by Hurricane Katrina or Hurricane Rita) has a question or a request regarding an administrative waiver for the **CSREES formula grant programs** (i.e., Smith-Lever Act, Hatch Act, Section 1444 and 1445 funds authorized under the National Agricultural Research, Extension, and Teaching Policy Act of 1977 (NARETPA), McIntire-Stennis Cooperative Forestry Act, Animal Health and Disease Research authorized under NARETPA Section 1433, and Renewable Resources Extension Act), they should contact:

Ellen Danus, Branch Chief, Policy, Oversight, and Funds Management Branch, CSREES-USDA, Stop 2298, 1400 Independence Avenue, SW, Washington, DC, 20250-2298, telephone: (202) 205-5667, or via e-mail to <u>edanus@csrees.usda.gov</u>.