

March 20, 2020

Margaret Weichert
Deputy Director of Management
Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

Sent Electronically to: margaret.m.weichert@omb.eop.gov

RE: Expression of Appreciation on OMB's March 19 Release of M-20-17

Dear Ms. Weichert,

In follow up to our [March 18 letter](#), and on behalf of The Council on Governmental Relations, the Association of American Universities, the Association of Public and Land-grant Universities and the Association of American Medical Colleges and our entire collective memberships, I write to express our sincere appreciation of OMB's expeditious release of [M-20-17](#), "Administrative Relief for Recipients and Applicants of Federal Financial Assistance Directly Impacted by the Novel Coronavirus (COVID-19) due to Loss of Operations."

As institutions across this country face unprecedented challenges in their response to COVID-19's impact to the research enterprise, we hope federal agencies will use M-20-17 as a sound basis for developing guidance in response to this public health emergency. Flexibility in adhering to existing regulations but consistency in interpretation among federal agencies, now more than ever, is imperative so as to not add to the already significant financial, administrative and compliance burdens institutions are now facing.

We note that the memo did not address the notification requirement under 2 CFR 200.328 (d) (1), to either allow notifications to be deferred until the crisis is over or to allow blanket notifications (which would clearly not be able to include a statement of the action taken, or contemplated, and any assistance needed to resolve the situation) rather than grant-by-grant notifications.

Thank you for taking such a strong lead on this and we very much appreciate your partnership through these extraordinary times. We continue to be available to work with federal agencies and OMB to determine how best to manage this process once we are past the immediate public health emergency, and would welcome the opportunity for regular calls with OMB to monitor this situation as it evolves and to resolve any open issues as they arise. Please contact Wendy Streitz, President (COGR) at wstreitz@cogr.edu with any questions or for opportunities to be of assistance.

CC: Timothy Soltis, Deputy Controller: Timothy.F.Soltis@omb.eop.gov
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The Association of American Medical Colleges (AAMC) is dedicated to transforming health care through innovative medical education, cutting-edge patient care, and groundbreaking medical research. Its members comprise all 154 accredited U.S. and 17 accredited Canadian medical schools; nearly 400 major teaching hospitals and health systems; and more than 80 academic societies. The Association of American Universities (AAU) is an association of 63 U.S. and two Canadian leading research universities that transform lives through education, research, and innovation. AAU member universities collectively help shape policy for higher education, science, and innovation; promote best practices in undergraduate and graduate education and strengthen the contributions of leading research universities to American society. The Association of Public and Land-grant Universities (APLU) is a research, policy, and advocacy organization with a membership of over 200 public research universities, land-grant institutions, state university systems, and affiliated organizations in the U.S., Canada, and Mexico, that is dedicated to strengthening and advancing the work of public universities. The Council on Governmental Relations (COGR) is an association of over 185 research universities and affiliated academic medical centers and research institutes. COGR concerns itself with the impact of federal regulations, policies, and practices on the performance of research conducted at its member institutions.