



May 27, 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](mailto:margaret.m.weichert@omb.eop.gov)

RE: Request to Extend OMB's March 19 Memo M-20-17

Dear Ms. Weichert,

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 are four of the leading organizations representing research institutions. Our members collectively conduct a substantial amount of the nation's federally-funded research each year.

Our community continues to be extremely appreciative of the flexibilities provided for in [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.*" M-20-17 has provided a sound basis for federal agencies to release agency-specific COVID-19 related guidance to the grant community, and significant relief for institutions grappling with a quickly evolving landscape in which they must make decisions and provide guidance to their research teams.

While we understand these exceptions are time limited, and that these flexibilities will be reassessed on or before June 17, ***we strongly urge OMB to extend the flexibilities outlined in M-20-17 until September 30, 2020***, to coincide with the end of the federal fiscal year and to be reassessed at the end of that period. M-20-17 already recognizes that "many of the operational impacts and costs are unknowable at this point, as they will depend on the spread of the coronavirus and response dictated by public health needs." As many states are starting to slowly reopen and research institutions are in varying stages of ramping up on-campus research across the country, this uncertainty continues to be the case. Institutions are facing unprecedented challenges in their response to this crisis, and extending the flexibilities provided in M-20-17 will help to maintain a level of consistency in this response.

Thank you for continuing to take a strong lead on this; 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 discuss this situation as it continues to evolve and to help resolve any open issues as they arise. Please contact Wendy Streitz, President (COGR), at [wstreitz@cogr.edu](mailto:wstreitz@cogr.edu) with any questions or for opportunities to be of assistance.

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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 187 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.