




EXECUTIVE OFFICE OF THE PRESIDENT  
OFFICE OF MANAGEMENT AND BUDGET  
WASHINGTON, D. C. 20503

DEPUTY DIRECTOR  
FOR MANAGEMENT

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M-20-20

MEMORANDUM TO THE HEADS OF EXECUTIVE DEPARTMENTS AND AGENCIES

FROM: Michael Rigas  
Acting Deputy Director for Management 

SUBJECT: Repurposing Existing Federal Financial Assistance Programs and Awards to Support the Emergency Response to the Novel Coronavirus (COVID-19)

As our response to the national emergency for the coronavirus disease (COVID-19) continues to evolve, this Administration directs all Federal departments and agencies to marshal all legally available federal resources to combat the crisis. In accordance with the authority in 2 CFR § 200.102(a), *Exceptions*, OMB is issuing a class exception that allows Federal awarding agencies to repurpose their federal assistance awards (in whole or part) to support the COVID-19 response, as consistent with applicable laws.

As an example of this flexibility, agencies may allow recipients to donate medical equipment (including, but not limited to, personal protective equipment, medical devices, medicines, and other medical supplies) purchased with Federal assistance funds to hospitals, medical centers, and other local entities serving the public for COVID-19 response. This class exception also extends to the donation of other resources (such as labor, supplies, and contract services) funded under Federal financial assistance to support COVID-19 emergency response activities.

To exercise these exceptions, Federal awarding agencies must engage with their respective legal counsel to ensure that any such donation or repurposing of funds as permitted here complies with all legal requirements associated with such funding, including but not limited to compliance with the purpose of the appropriations and any restrictions in programmatic statutes, appropriations, and fiscal laws. Federal awarding agencies and recipients must maintain appropriate records and documentation of these exceptions. Federal awarding agencies must advise recipients that they should not assume additional funds will be available should the donations or repurposing of funds result in any type of shortage.

This is the third memorandum, in a series, regarding available Federal financial assistance flexibilities related to COVID-19. (See OMB M-20-11, *Administrative Relief for Recipients and Applicants of Federal Financial Assistance Directly Impacted by the Novel Coronavirus (COVID-19)* (March 09, 2020); and, OMB 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* (March 19, 2020)).

Questions regarding the above requirements should be directed to the Office of Federal Financial Management Grants Team at [GrantsTeam@omb.eop.gov](mailto:GrantsTeam@omb.eop.gov). OMB will continue to provide updates and additional information as the situation unfolds. For the latest information, sign up for the Grants Community of Practice: <https://www.performance.gov/CAP/grants/>