



September 28, 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: *Request to Extend / Quickly Reinstate OMB Memorandums M-20-17 / M-20-26
On behalf of the Members of COGR, AAU, APLU, AAMC, ACE, AAAS*

Dear Ms. Weichert,

I write on behalf of the Council on Governmental Relations (COGR), the Association of American Universities (AAU), the Association of Public and Land-grant Universities (APLU), the Association of American Medical Colleges (AAMC), the American Council on Education (ACE), and the American Association for the Advancement of Science (AAAS). Our organizations represent a wide range of research institutions, scientists, engineers, and innovators and our members collectively conduct the vast majority of the nation's federally-funded research each year.

We are thankful for the ongoing efforts of OMB to provide administrative and fiscal flexibilities to research universities and other research entities during the COVID-19 pandemic. OMB [M-20-17](#) provided a wide range of administrative and fiscal flexibilities through June 19 and OMB [M-20-26](#) allowed the salary charging flexibilities to continue

through September 30. **These flexibilities have allowed our community, as well as a diverse range of other grantees, to both maintain our federal programs and provide salary continuity during the pandemic.** While the lifeline was especially crucial during the initial months of the pandemic, these flexibilities have also continued to provide a critical safety net during the ramp up of our research activities throughout the summer and into the fall.

We strongly urge OMB to extend the flexibilities beyond September 30, 2020, and at least into the second quarter of FY 2021 when the flexibilities could then be reevaluated—or at a minimum, have a process in place to quickly reinstate these flexibilities if pandemic safety measures necessitate additional restrictions to research activities. While many institutions have reopened labs and are expanding research activities into a fully functioning mode of operation, the reality is that “fully-functioning” represents functioning under the new “pandemic normal” where social distancing, shift scheduling, and restricted access to research labs are the norm. Further, certain types of field research (e.g., education research, social and behavioral, research involving human subjects, international, and other remote-site research) continue to face challenges; while at the same time, graduate students in all fields are at risk as completion of their required research work has been curtailed. In a scenario where research activities must once again be ramped down, having access to the OMB flexibilities will be necessary.

Thank you for your ongoing leadership on this and many other issues—we very much appreciate your partnership through these extraordinary times. Please contact Wendy Streit, President (COGR), at wstreitz@cogr.edu with any questions or for opportunities to be of assistance.

Sincerely,



Wendy D. Streit
President

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