



April 27, 2021

**VIA ELECTRONIC MAIL**

Steven P. Mackey  
Director, Federal Assistance  
Office of the Procurement Executive  
Bureau of Administration  
U.S. Department of State  
[Bmackeysp@state.gov](mailto:Bmackeysp@state.gov)

**RE: DOS Extension of Flexibilities Pursuant to OMB Memo M-21-20**

Dear Mr. Mackey:

Like the federal government itself, non-federal partners implementing grants and cooperative agreements continue to face the unprecedented operational disruptions caused by the COVID-19 pandemic. Shutdowns, shifts to remote work, and extensive rescheduling continue to inhibit Department of State (DOS) assistance award recipients' project implementation. And, because of the wide variety of host country COVID-19 related conditions that they have had to confront, most DOS award recipients have arguably faced greater performance challenges than those of organizations performing exclusively in the United States.

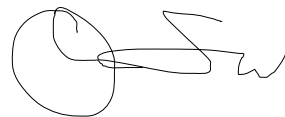
As an organization that represents more than 300 international development and humanitarian assistance organizations, many of which receive DOS assistance awards, Humentum was immediately made aware of the difficulties that its members would face in the period after the declaration of a U.S. national emergency on March 13, 2020. That is why we welcomed the Office of Management and Budget's (OMB) issuance of Memorandum M-20-17 on March 19, 2020. The policy flexibilities that were provided in that directive, coupled with effective federal outreach, alerted our members to opportunities to reduce administrative burden while maintaining accountability. Even though OMB curtailed those flexibilities later in 2020, our members report that when granted they provided needed administrative relief.

As you know, on March 19, 2021, OMB issued Memorandum M-21-20, thereby reinstating federal agency authority to grant many of the flexibilities of M-20-17. Some of the flexibilities, such as extension of the deadline for submission of single audit reporting packages, require no approval action by the federal awarding agency. However, others necessitate an approach under which recipients and agreement officers, or their representatives, must communicate and collaborate concerning specific award adjustments.

Accordingly, we are hopeful that your office will continue to take appropriate action to broadly inform DOS staff of their prerogatives and to encourage them to utilize them *wherever possible* in accordance with applicable laws and regulations. We believe that a recent report issued by the Government Accountability Office (GAO-21-318), which urges OMB to share the lessons learned under the 2020 flexibilities by the three federal agencies with the largest federal assistance portfolios, could help further reinforce your agency's confidence level about use of these expanded recipient authorities. For our part, we have alerted our members concerning the policies in Memorandum M-21-20 and are suggesting ways for them to provide effective assurance to your agency's personnel that they can operate accountably in a more flexible award environment.

We appreciate your consideration of this request and we stand at the ready to continue constructive dialogue on the DOS assistance policies that affect our members.

Sincerely,

A handwritten signature in black ink, appearing to read 'CS', with a large circular flourish on the left side.

Christine K. Sow  
President & CEO

CKS/cms & rl  
CC: Humentum Members