



November 13, 2023

MEMORANDUM FOR: Regional Administrators
Regional Recovery Division Directors

FROM: William C. Hagmaier
Assistant Administrator
Recovery Directorate

SUBJECT: Extension of the COVID-19 Prime Award Period of Performance
and Grant Closeout and Liquidation Period

The purpose of this memorandum is to extend the FEMA Public Assistance (PA) prime award period of performance (POP) for all coronavirus (COVID-19) declarations to May 11, 2026, and extend the grant closeout and liquidation period (CLP) to August 10, 2026.¹

On Feb. 10, 2023, FEMA issued a memorandum establishing May 11, 2023, as the final PA Emergency Work completion deadline for the COVID-19 national emergency and major disaster declarations.² On March 30, 2023, FEMA released the [Coronavirus \(COVID-19\) Pandemic: Public Assistance Programmatic Deadlines Policy, Version 2](#) (*Programmatic Deadlines Policy*) establishing PA programmatic deadlines across all COVID-19 emergency and major disaster declarations to ensure consistent and appropriate implementation across all COVID-19 declarations.

FEMA defines the prime award POP³ as starting on the first day of the incident period and ending four years from the date of declaration. For COVID-19, this would mean that the prime award POP end date would be March 13, 2024 (four years after March 13, 2020) for all emergency declarations, and the prime award POP would vary across each state, tribe, and territory that received subsequent major disaster declarations.⁴ The *Programmatic Deadlines Policy* includes two deadlines that fall outside of the prime award POP: the project closeout submission deadline (May 6, 2024) and the management costs deadline (May 11, 2025).

Since the standard prime award POP for all COVID-19 emergency and major disaster declarations will occur prior to the project closeout deadline and the management costs deadline, FEMA is establishing May 11, 2026 as the modified prime award POP end date. This modified

¹ Since 90 calendar days after the end date of the period of performance established in this memo as May 11, 2026 is Sunday, August 9, 2026, FEMA is extending the grant closeout and liquidation period to August 10, 2026.

² [End of the COVID-19 Incident Period and Resulting Program Guidance \(fema.gov\)](#)

³ PAPPV V.3.1, at page 161, defines period of performance as the time during which the non-Federal entity may incur new obligations to carry out the work authorized under the Federal award. *See also* 2 C.F.R. § 200.77.

⁴ A majority of the COVID-19 major disasters were declared from March 20, 2020 through May 8, 2020, meaning the prime award POP for those would end between March and May 2024 depending on when the respective major disaster was declared. However, two tribal governments received COVID-19 major disaster declarations in February and March 2021, meaning those prime award POPs would be between February and March 2025.

end date represents the expiration of the prime award POP for all COVID-19 declarations, which means that recipients and subrecipients must incur all costs under the prime award, including any applicable management costs, on or before May 11, 2026. FEMA will not allow any additional extensions to the prime award POP end date, either blanket or individual.

The prime award POP end date also establishes the liquidation period, which is 90 days after the prime award POP expiration⁵ and the 1-year period for FEMA to close the declaration upon receipt of the request to close the program. Since this memo establishes May 11, 2026 as the prime award POP expiration date, then the CLP is concurrently extended to Aug. 10, 2026.⁶ FEMA Regional Administrators (RAs) may extend the CLP deadline up to 90 days after Aug. 10, 2026, when the request is justified based on extenuating circumstances beyond the recipient's or applicant's control. For time extensions beyond 90 days, RAs must coordinate with the Assistant Administrator, Recovery Directorate at FEMA Headquarters for concurrence.

If you have any questions, please have your staff contact Robert Pesapane, Director, Public Assistance Division, at robert.pesapane@fema.dhs.gov.

cc: Anne Bink, Associate Administrator, Office of Response and Recovery
Victoria Salinas, Senior Official Performing the Duties of Deputy Administrator,
Resilience

⁵ 2 C.F.R. § 200.343(b) defines the grant closeout and liquidation period as the time after the grant performance period ends when a non-Federal entity (NFE) must liquidate all obligations incurred during the POP (90 days unless an extension is requested by the NFE and approved by the federal awarding office).

⁶ See *supra* at footnote 3.