Humentum meets regularly with key counterparts at USAID regarding its response to the Coronavirus pandemic, as well as other operational issues faced by members which require Humentum administrative advocacy.

In a recent meeting, Humentum joined InterAction in a discussion of concerns about NICRA rates in light of rapidly shifting programming and overhead expenses. In response, USAID added the following guidance to its newly-revised (April 2, 2020) FAQs. Of note, USAID has created an indirect mailbox for implementing organizations to communicate their concerns/issues directly with the Agency.

To support partners, USAID established COVID19_IndirectCosts@usaid.gov email box where partners can send NICRA-related questions. Implementing partners (IP) that already have a NICRA issued by USAID, and are experiencing significant increase(s) in their provisional indirect cost rate(s) (NICRA) given the current operating environment may request adjustments to current provisional indirect cost rates. In order to expedite the request for adjustments to current provisional indirect cost rates, partners must submit a written request to the COVID-19 email box; along with the following documentation:

- Detailed Indirect Cost Rate calculation that shows detailed cost by cost element in both the base of application and pool of expenses for each rate; supported by financial information (i.e. trial balance and budgetary data). The Calculations should break out the actuals through the most recent completed month plus projections for the remainder of the year.
- Comparative analysis: compare the current projections to prior year actuals.
- Detailed Schedule listing all expenses related to COVID-19; and how are they tracked in the accounting system.
- Written justification explaining the need to incur these additional expenses.
- Identification of any significant decreases in base of application; and a written explanation for the decreases.
- Identification of any cost previously treated as direct costs that are now being treated as indirect costs; and provide a written explanation.
- Written policy for tracking paid time off and teleworking. Also, please provide any HR Policies and Procedures related to paid time off, and teleworking due to extraordinary circumstances.
- What actions has the organization currently taken; or plan to take to mitigate cost.

Finally, USAID has also updated its Memo Authorizing Flexibilities, with revisions highlighted in yellow on April 2, 2020.