

Blanket waiver of disposition per PL 116-315

Subject: Waiver of OMB disposition repayments during COVID-19

Date: April 2021

Dear GPD grantees,

This message is intended for **organizations** who in the past received a capital grant(s) from GPD and for whom the capital requirements remain in effect as of January 5, 2021.

This message is **not intended** for organizations who received a capital grant in the past and already were indebted or already received disposition instructions from GPD related to that capital grant. For those cases, GPD's past decisions stand and this message is **not applicable**.

For all others, the following message is applicable.

If your past GPD capital grant(s) involved acquisition costs (e.g. acquisition of a building, land, or equipment such as a van), then the Office of Management and Budget (OMB) disposition requirements were applicable to your capital grant(s).

- However, on January 5, 2021, [Public Law 116-315](#) was enacted. Under the authority of Section 4201(b)(6), during the COVID-19 national emergency, GPD is required to waive such disposition requirements.
- Therefore, by way of this message, **GPD provides your organization a waiver** of the OMB real property disposition repayment requirements ([2 CFR 200.311\(c\)](#)) and/or the equipment disposition repayment requirements ([2 CFR 200.313\(e\)](#)). This waiver is provided based on the COVID-19 national emergency being ongoing to date and based on your organization no longer providing services in accordance with the terms of the capital grant(s) awarded in Fiscal Year 2013 or before by GPD under the authority of [38 USC 2011\(b\)\(1\)](#) and terminated by VA on September 30, 2017.

For all past GPD capital grant recipients, regardless of whether your past capital grant(s) involved acquisition, construction, renovation and/or vehicle costs:

- The VA **recovery provisions remain in effect** ([38 CFR 61.67](#)) unless or until the minimum period of operation is met as determined by the activation date and by the original capital grant amount.

No response is need from your organization.

We remind you to document your files accordingly and to comply with record retention requirements (e.g. [2 CFR 200.334](#)).

Thank you for your work supporting Veterans.

The GPD National Program Office