D-2600

June 25, 2020

Memorandum

To: Federal Personnel and Payroll System (FPPS) User Group Representatives

From: Christine Zertuche-Rocha, Chief //signed//

Payroll Operations Division

Subject: Time and Attendance Coding and Waiver of the Premium Pay and Aggregate Pay Limitations

On March 27, 2020, the “Coronavirus Aid, Relief, and Economic Security Act” (CARES Act), Public Law 116-136, was enacted. It contains two sections providing an agency head with authority to waive the biweekly premium pay limitation found at 5 U.S.C. 5547(a), apply a higher annual premium pay cap, and to exclude premium pay from the aggregate limitation on pay found at 5 U.S.C. 5307, for work performed in response to COVID-19. On April 14, 2020, the Office of Personnel Management (OPM) issued a [memorandum](https://www.opm.gov/policy-data-oversight/covid-19/opm-memorandum-waiver-of-the-premium-pay-limitation-and-aggregate-pay-limitation-for-employees-working-in-response-to-coronavirus-disease-2019-covid-19/?utm_medium=email&utm_source=govdelivery) providing information on these new provisions, including the legislative text of sections 16003 and 18110 of the CARES Act. CARES Act sections 16003 and 18110 are effective as if enacted on January 1 and February 2, 2020, respectively, for covered services through the end of the fiscal year 2020.

For employees who perform work in emergency situations that involve a direct threat to life or property or in mission-critical situations that do not meet the coverage conditions of the CARES Act waiver authorities, OPM’s memorandum clarifies that the head of an agency may apply an annual premium pay cap instead of a biweekly premium pay cap, subject to the conditions provided in law and regulation (See 5 U.S.C. 5547(b) and 5 CFR 550.106-550.107). OPM has no authority to further waive the title 5 premium pay limitation or aggregate pay limitation.

To apply appropriate pay limits, as outlined in OPM’s April 14, 2020 memorandum, the Payroll Operations Division (POD) has updated a previous system Enhancement (ENHC) for changes to the Federal Personnel and Pay System (FPPS). Until the ENHC can be implemented into FPPS, the below action applies. Please know that the Interior Business Center’s client agencies use several different T&A systems; each system may be unique in its processing of the Lift Biweekly maximum (LB) code and handling of messages to payroll. Please give your timekeepers and/or administrators the applicable coding for your T&A system(s).

**Agency actions:**

* To allow premium payments to be excluded from the biweekly limits, use your applicable T&A system code LB to lift the biweekly maximum
* Any amended or original T&A entries that have an LB code must also enter the appropriate payroll message to the applicable CARES Act Section:
* “COVID-19 Section 16003 FEMA”
* ‘COVID-19 Section 18110’
* POD requests agencies use the [attached spreadsheet](https://content.govdelivery.com/attachments/USDOIIBC/2020/06/25/file_attachments/1481836/Employees%20Identified%20as%20CARES%20Exception%20to%20Pay%20Limitation.xlsx)to list employees that fall under either CARES section. Agencies can begin sending their spreadsheets on October 8, 2020, as POD will manually recalculate and process any applicable payments to employees who had reduced pay.
* Provide your [agency’s spreadsheet](https://content.govdelivery.com/attachments/USDOIIBC/2020/06/25/file_attachments/1481836/Employees%20Identified%20as%20CARES%20Exception%20to%20Pay%20Limitation.xlsx) to your applicable Payroll Section Supervisor (listed in the chart below) and the Payroll Operations Branch Chief, Rebecca Romero.

FPPS currently monitors annual and aggregate pay limits. For those employees identified on the spreadsheet as exempted under the CARES Act sections 16003 and/or 18110, along with having the applicable T&A message, the POD will manually recalculate and process any applicable payments to those employees who had reduced pay.

| **Agencies** | **Name** | **Phone Number** | **Email Address** |
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| *Branch Chief* | Rebecca Romero | 303-969-7450 | Rebecca\_N\_Romero@ibc.doi.gov |
| Pay Processing Section 1 –**Serviced Agencies –** BIA, SOL, FWS, CPSC, FLR, SSS, FERC, JMF, TDA, IAF, TIB, ADF, NASA, DCC, EDU, SCJ, USC, CFA, Casuals | Karen Galperin | 303-969-7409 | Karen\_A\_Galperin@ibc.doi.gov |
| Pay Processing Section 2 - **Serviced Agencies –** NPS, OSM, BOE, ARC, CSB, NSF, SEC, HST, PT, HD, IMLS, UTC, NRC, ABMC, BSE, EXIM, FHFA, NARA, PDB, JFK | Monica Dybing | 303-969-7424 | Monica\_L\_Dybing@ibc.doi.gov |
| Pay Processing Section 3 - **Serviced Agencies –** OS, ONRR, USG, BOR, OIG, OAS, BLM, PBGC, ITC, FTC, OPIC, UT, EEOC, ONH, VCT, MCC, EPA, OST | Brandi Hartman | 303-969-7475 | Brandi\_J\_Hartman@ibc.doi.gov |
| Pay Processing Section 4 - **Serviced Agencies –** SSA, NLRB, NTSB, PDS, DOT, FAA, IBWC, NMB, SLS, STB | Debbie Bentley | 303-969-6347 | Debbie\_S\_Bentley@ibc.doi.gov |

**Questions:**

If you have questions, please contact your Payroll Processing Supervisor point of contact or Rebecca Romero at (303) 969-7450.

**Resources:**

[Employees Identified as CARES Exception to Pay Limitation.xlsx](https://content.govdelivery.com/attachments/USDOIIBC/2020/06/25/file_attachments/1481836/Employees%20Identified%20as%20CARES%20Exception%20to%20Pay%20Limitation.xlsx)