

April 14, 2020

CVAD Guidance for Grantees Regarding the COVID-19 Pandemic

Dear CVAD Grantees:

This memo is to provide you with some guidance during the COVID-19 pandemic.

First, on behalf of the Crime Victim Assistance Division of the IA Attorney General's Office, thank you for your tireless work to help victims of crime, especially during this difficult time. For additional clarification or assistance with anything listed below, contact your CVAD grant manager.

Claims: Even though most CVAD staff are working remotely, claims will continue to be processed as quickly as possible; however, payments are made once per week. Nothing regarding claim submission has changed. Your agency must still abide by your risk assessment designation and required back up documentation. We understand you might need additional time to submit your claims. Please contact your CVAD grant manager to discuss an extension if needed.

Budget Revisions: Due to changes in your organizational processes or structure you might need to shift funds from one budget category to another. The rules for budget revisions have not changed. If you need to move more than 10% from a line item category or move money into a new category, you need to request a formal budget revision along with a brief narrative explaining the need for the revision. Budget revisions are to be emailed to your CVAD grant manager.

Travel – If you had to cancel CVAD travel and there were cancellation costs, you can charge those costs to your CVAD grant if the travel was in your approved CVAD budget. If CVAD paid for any travel in advance, such as registration or airline tickets and your agency received reimbursement for those expenses you will need to credit your CVAD grant. You will credit the same expense category to which the charge was originally posted. For example, registration was charged to out of state travel, the trip was cancelled, and your organization was refunded the registration costs. You need to credit out of state travel on a future claim. If a cancelled trip results in the traveler receiving airline credits or e-credits, and CVAD reimbursed your organization for the trip, your organization should use those credits for a future victim services appropriate trip and only request reimbursement for costs exceeding the original reimbursement costs. If the cancelled trip results in the traveler receiving e-credits and your organization credited the cost of the trip to your CVAD grant, then the credits can be used for a future victim services appropriate trip and your organization can seek reimbursement for the actual cost of the trip.

Match Waivers – CVAD will accept match waiver requests if you anticipate not being able to meet the required match per your CVAD contract. As a reminder, nonfederal funds, such as state funds, can be used to help meet your match as long as the nonfederal funds are used for eligible federal expenses.

Service Standards – As many of us are working remotely, services to victims will look different. CVAD will support any alternative service model your agency employs as long as you operate under guidance provided by any of the three state coalitions or other national service organization **and** you have

documentation on file for the change. All staffing and service provision changes must be consistent with agency policy and applied in the same manner to both CVAD and non-CVAD funded staff. If your program will need to temporarily suspend services, please reach out to your CVAD grant manager.

Hazard Pay - Hazard pay is subject to the same requirements in 2 C.F.R. § 430 as any other type of compensation. Recipients (and subrecipients) may continue to charge salaries and benefits to their awards consistent with their policy of paying salaries and benefits under unexpected or extraordinary circumstances from all funding sources (CVAD and non-CVAD). As is the case for all compensation costs charged to a CVAD award, any hazard pay must be reasonable, consistent with agency policy and applied in the same manner to both CVAD and non-CVAD funded staff. In developing and applying their policies on what constitutes a hazard in the context of COVID-19, recipients and subrecipients may look to federal, tribal, state, or local guidelines. Recipients are required to maintain copies of their policies and cost documentation (as required by 2 C.F.R. §§ 200.302, 200.333, and 431(b)(1)) to substantiate the charging of salaries and benefits to their awards. Hazard pay is not to be confused with bonuses. Bonuses are still not allowed with CVAD funds.

SAM Registration: 60-day extensions to SAM.gov registrations with expiration dates between 3/19/2020 and 5/17/2020 will automatically be initiated. This effort is expected to be completed by 3/28/2020.

Updated Policies: We have already received several updated administrative policies addressing work changes due to the pandemic. If additional revisions are needed, please send those revised policies to your CVAD grant manager as soon as they are available. If you are working on updating your policies and have questions, please contact your CVAD grant manager. If staff are on leave, timesheets will need to be provided stating leave was taken and charged appropriately to your CVAD grant. Leave should be prorated to funding sources in the same manner the time would have been charged if the staff were working. Activity tracking is to state the staff is on leave due to the pandemic. Prorating time, while on leave and activity tracking should be included in your revised leave policies. We understand that signatures may need to be obtained later or provided electronically.

Links to COVID Guidance:

OJP:

[file:///C:/Users/lorio/Downloads/OJP_Guidance_on_Short_Term_Administrative_Relief_March_2020%20\(1\).pdf](file:///C:/Users/lorio/Downloads/OJP_Guidance_on_Short_Term_Administrative_Relief_March_2020%20(1).pdf)

OVW: <https://www.justice.gov/ovw/page/file/1262836/download>

Administration for Children and Families - [file:///C:/Users/lorio/Downloads/IM-ACF-OA-2020-01%20ACF%20COVID%20Flexibilities%20\(FINAL%20March%2030%202020\)%20\(002\)-signed.pdf](file:///C:/Users/lorio/Downloads/IM-ACF-OA-2020-01%20ACF%20COVID%20Flexibilities%20(FINAL%20March%2030%202020)%20(002)-signed.pdf)

The CARES Act:

<https://assets.documentcloud.org/documents/20059055/final-final-cares-act.pdf>

CVAD will be working remotely at least until the end of April. Our telephones are forwarded to our personal phones and we are available by email during business hours. Please do not hesitate to contact

your CVAD grant manager with any questions or concerns you have. We will do our best to respond timely to all requests. If you do not hear back immediately from your grant manager, please refrain from calling or emailing multiple grant managers.

Again, thank you for your tireless work. Please take care of yourself and your families.

Sincerely,

Janelle Melohn and Lori Miller