



Grantees' Guidance in the wake of the COVID-19 State of Emergency

April 2, 2019

We salute the individuals on the front lines who serve victims in the aftermath of a crime, especially during these difficult times. We realize that Vermont's Stay Safe/Stay at Home emergency order, which intends to protect us all against the Novel Coronavirus, has presented you with unprecedented challenges in providing the services you typically furnish to protect the safety and security of Vermonters.

Our state and federal funders have provided guidance in response to this crisis. We are sharing this information to help answer questions you may have about administering your grant funds at this time. We hope to be as accommodating as possible. This information will be updated as needed via email and on the [grants/finance page](#) on the C CVS website.

If you have questions, feel free to reach out to our grants/finance team via email,

Yours respectfully,

Gene Nelson, Grants Manager (for grant questions)

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Omara (for grant questions), Grants Manager

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Carol Brochu, Finance Director (for finance questions)

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Grant Payments/Reimbursements

We recognize that many of you may not be able to process your quarterly financial report by the typical due date of April 15 for your work from January-March 2020.

On March 16, CCVS sent an email to subgrantees extending the due dates for the [Quarterly Financial Reports](#) until April 22, 2020. We still hope that most subrecipients will be able to submit by this date. However, if you are not able to process your financial report by this date, we will be continually processing reports on a weekly basis and we will be able to process your requests after 4/22.

Federal Grants

If circumstances prevent you from being able submit your financial report for the quarter Jan-March, by 4/22 or after, please reach out to Carol and she will work with you to create a plan for your financial reporting.

State Grants

CACs, SVPs, DV/SV (Act 174) and Anti-violence grant recipients may request 100% of the funds they have remaining at this time.

If circumstances prevent you from being able submit your financial report for the quarter Jan-March, by 4/22 or after, please reach out to Carol and she will work with you to create a plan for your financial reporting.

Grant Modifications

No grant modification is needed for programs when 10% of any line item or less is moved from one-line item to another in a budget.

Grant Modifications will be extended until May 1, 2020. Hopefully this will allow you the time needed to process changes that may arise during the next few weeks. [Our grant modification form](#) is available on our web site. You can send modifications to financial.reports@ccvs.vermont.gov.

Please remember when requesting grant modifications that the allowability of costs must be necessary and reasonable for the performance of the award and be allocable under the federal and state rules pertaining to that award.

Given that Vermont has declared a state of emergency, CCVS will allow the submission of grant modification requests, after the fact, regarding COVID-19 related expenses. In other words, we understand that you may have already had unforeseen expenses associated with closing or cleaning offices, or increased

costs associated with sheltering of individuals and have not yet had a chance to submit a grant modification request.

Progress Reporting

VOCA PMT

The due date for reporting to the PMT regarding your work from January through March has been extended for CCVS subgrantees from April 30 to June 15. If you still need more time, reach out to Omara.

STOP and SASP Progress Reports

CCVS has received most of these reports from subgrantees as they were due March 13. We will continue to work with the few who have been unable to provide the reports due to the crisis. We would like to have these completed by April 15. Reach out to Gene for questions on OVW grants.

No other programmatic reporting is impacted by COVID-19 at this time.

Programmatic and Fiscal Monitoring

All in-person site visits that had been scheduled for this spring have been cancelled thus far. We hope to reschedule those once the social distancing orders are lifted. If information is needed before then, we will reach out to individual subgrantees to request the pertinent information.

Furthermore, should circumstances prevail, CCVS will conduct programmatic and fiscal monitoring remotely via desk reviews, telephone conversations and/or video conferencing.

Match Requirements

Many programs rely on volunteers, monetary donations or other sources for their non-federal match requirements. We understand that those options may not be available to you now. CCVS has developed a match waiver form that is available on our website. If you are unable to meet your match, please fill out the form, and send it to financial.reports@ccvs.vermont.gov. We will do our best to honor your request.

Payment of Salaries and other Project Activities

We encourage you to update your personnel manuals ASAP.

You may use grant funds to cover the costs of staff working remotely, teleworking or paid leave. However, you must have a policy in place that addresses the scenarios specific to your agency's unique work culture. It is important to remember that both federally funded and non-federally funded positions be treated consistently.

Updates to your policies may include:

1. Leave: Unexpected or Extraordinary Circumstances

Our federal funders encourage grantees to review and update (if necessary) their written leave policies to address "Unexpected or Extraordinary Circumstances." These circumstances may include national emergencies relating to terrorism, biological events or natural disasters or other unforeseen events not yet imagined. It is understood that most organizations did not have this caveat in place.

You should consult your board and you may want to consider making such policies effective on the date the circumstances began, if permissible under your laws, rules, and policies. It will be up to you to draft the language of the leave policy in your personnel manual and the start date of the policy or policies in a way that is consistent with your agency's practices.

2. Remotely Working or Telecommunicating Policy

Telecommuting is a work arrangement that allows employees to work at home or at some other off-site location for all or some of their regularly scheduled work week. Not all jobs can be performed satisfactorily from other locations, we trust that you understand the job requirements of your people and can create a mutually beneficial option for both you and your employees.

Please note that the costs of home office space and related utility expenses are unallowable costs for employees teleworking during this national emergency.

3. Families First Coronavirus Response Act (FFCRA)

Resources for your employees leave may include payment for Covid-19 related changes in work provided under the Families First Coronavirus Response Act (FFCRA), which allows varying amounts of leave without utilizing one's accrued PTO. For more information on the FFCRA click [here](#).

By law you must inform your employees of their rights under the FFCRA. The US Department of Labor has created a poster for that purpose, like the other labor rights posters you have posted in your workplace. You can find the poster [here](#). Since not everyone is going to the workplace these days, distributing the poster via email or on your agency's website is advisable.

4. Coronavirus Aid, Relief, and Economic Security (CARES) Act

The federal CARES act provides support for self-employment and other Vermonters who might not qualify for typical Unemployment Insurance. You can find out more about the CARES Act and applying for benefits on the Vermont Department of Labor website.

5. Working at Home? FFCRA? Leave due to Unexpected or Extraordinary Circumstances? CARES Act? Or somewhere in between?

You may wish to create a check list to help determine the scenario that best fits the details of your varied employees during the COVID-19 pandemic.

Substantiation and Documentation of Leave and/or Working from Home

It is crucial that you maintain documentation that supports the charging of salaries and benefits during the interruption of operations or services, and other costs due to these unusual circumstances. It would be a good idea to keep a file that is specific to each employee.

Documentation to support charging of salaries and benefits during interruption of operations or services as required by 2 CFR § 200.302 (Financial Administration), and 2 CFR § 200.333 (Retention Requirements for Records) and 2 CFR § 431 (b)(1) (Compensation/Fringe Benefits) should be maintained in your agency's files. The link to the Code of Federal Regulations (CFR), can be found [here](#). This is also a good time to review the [DOJ Grants Financial Guide](#).

Copies of Governor Scott's executive orders in your personnel files may be helpful in documenting the start of the work at home or leave status of your personnel. These executive orders can be found on [the Governor's web page](#).

RESOURCES:

[The DOJ Grants Financial Guide](#)

[The Electronic Code of Federal Regulations](#)

[The Families First Coronavirus Response Act](#)

[Vermont's Department of Public Safety COVID-19 Information](#)

[Vermont's Department of Human Resources COVID-19 Information](#)

[Vermont's Department of Labor COVID-19 Information](#)

[Vermont Helplink Alcohol & Drug Support Center](#)

[Vermont's Department of Health COVID-19 "What You Need to Know"](#)

[The Federal Register Re: Victims of Crime Act Victim Assistance Program](#)

[The Federal Register Re: The STOP Violence Against Women Formula Grant](#)

[The Federal Register Re: The Family Violence Prevention Services Act Grant](#)

[The Centers for Disease Control and Prevention COVID-19 Resource Page](#)

As always, don't hesitate to reach out with any questions or concerns you have!