

Administrative Relief for Recipients and Applicants of DCJ Grants Directly Impacted by the Novel Coronavirus (COVID-19)

Effective March 16, 2020

- This document applies to both State and Federal grant recipients of DCJ grants although the language is heavily pulled from federal guidance. If you have a question regarding these exceptions, please contact your DCJ grant program manager.
- This document outlines the short term relief for various administrative, financial management, and audit requirements under 2 CFR Part 200, Uniform Administrative Requirements, Cost principles and Audit Requirements for Federal Awards and State Grants. These exceptions are time-limited and **will be reassessed within 90 days from March 19, 2020.**
- **All grant programs.** Grantees should carefully review and, if necessary, modify your existing human resources policies to ensure they address telework, remote work, and/or administrative leave in the advent of unexpected or extraordinary circumstances, such as the current COVID-19 national emergency. You should consult your board, when necessary, and you may want to consider making such policies effective on the date such circumstances began, if permissible under your laws, rules, and policies.
- **All grant programs (except NCHIP)** do not require prior approval to implement exceptions unless specified below, however, supporting documentation must be included in the grant file to address any exception used during this crisis. Documentation must be made available upon request. An absence of documentation may result in unallowed costs. Keep a copy of this document in the grant file.
- **Federal Grantees Only:** Grantees (and subrecipients/subgrantees) should review the DOJ Grants Financial Guide and the Part 200 Uniform Requirements (2 C.F.R. Part 200, as adopted by DOJ) (see, for example, 2 CFR 200.430 and 2 C.F.R. 200.431, under Subpart E – Cost Principles), and the grantee’s (or subrecipient’s/subgrantee’s) established policies, to help in determining how the grantee’s personnel costs may be treated during any period(s) of interruption to the performance of work under the award. You should direct any questions about allowability of costs to your grant manager.
- **DCJ – Office of Victims Programs (OVP) Grantees:** This document addresses administrative functions. OVP is maintaining a separate document for specific exceptions related to the program (e.g. Can I use funds for shelter services to place victims in hotels?). This document is located here:
<https://docs.google.com/document/d/1FP0dy9ksZNFVDJJCZMqyg8H5vIR1MjHjOfSabeg3r8/edit>.
- **National Criminal History Improvement Program (NCHIP) Grantees Only:** This is a **Cooperative Agreements** issued by Office of Justice Programs (OJP) to the Division of Criminal Justice.
 - Require **prior approval** from the grant manager prior to initiating any changes to the project.
 - Grantee should contact Kristy Wilson promptly to discuss anticipated changes. Grantee must submit a modification request for any cost or project changes related to NCHIP grant award.
- **References:**
 - Office of Justice Programs (OJP)- Grantee Update #1 COVID-19 Impacts (March 16, 2020) – M-20-15
 - Office of Justice Programs (OJP)- Grantee Update #2: Guidance on Short Term Administrative Relief for Grantees Impacted by COVID-19 (May 21, 2020) – M-20-17
 - Office on Violence Against Women (OVW)- March 19, 2020 Message from OVW Acting Director Rogers Regarding COVID-19”

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All Grant Programs:

Topic / Question	Grantee Guidance
Staffing	<p>DCJ staff is available remotely.</p> <p>Note: Due to volume of personnel working from home, the DCJ phone call forwarding is not available. You may leave a message and staff will retrieve messages periodically each week. The best way to initially communicate with your grant manager is via email.</p>
Temporary Exceptions Documentation & Prior Approvals	<p>All exceptions outlined below must be documented, retained in each grant file and be made available upon request. Lack of documentation may result in unallowable costs and non-reimbursement for expenses.</p> <p>Note: Unless your organization has outstanding monitoring findings from DCJ, prior approval is not required to implement the following exceptions.</p> <p>Note: NCHIP grant recipients must seek prior approval on all changes. Please contract Kristy.Wilson@state.co.us for any proposed changes and/or exceptions.</p>
Payments	<p>The process will remain the same for payment requests in ZoomGrants. If your grant is not in ZoomGrants, please submit your payment request via email.</p>
On-site Monitoring	<p>Postponed until further notice</p>
Can grant funds be used to pay staff if they are teleworking?	<p>Yes - Only if your organization has an established policy in place allowing staff to telework.</p> <ul style="list-style-type: none"> ● Document your policy as described above. ● If your organization does not currently have a telework policy, follow the necessary procedures to establish a policy for your organization as quickly as possible.
Can we use grant funds to pay staff if they take leave?	<p>Yes – Only if your organization’s leave policy allows for this. It is important to remember that both federally funded and non-federally funded positions must be treated consistently.</p> <ul style="list-style-type: none"> ● Document your policy as described above. ● If your organization does not currently have a leave policy, follow the necessary procedures to establish a policy for your organization as quickly as possible.
Can grant funds be used to pay staff who are on administrative leave?	<p>Yes – Only if your organization’s administrative leave policy allows for this. It is important to remember that both federally funded and non-federally funded positions must be treated consistently.</p> <ul style="list-style-type: none"> ● Document your policy as described above. ● If your organization does not currently have an administrative leave policy, follow the necessary procedures to establish a policy for your organization as quickly as possible.
Can grant funds be used to pay staff if they are unable to telework because of the kind of work they normally perform?	<p>While an employee may not be able to perform their normal day-to-day duties while teleworking, organizations should consider other related work that could be performed remotely by the employee. Examples: Program planning, staff development (including taking advantage of remote training opportunities), catching up on administrative work, internal capacity building, performance reviews, etc.</p> <ul style="list-style-type: none"> ● If other related work is not possible, use the leave policies as described in this document.

Topic / Question	Grantee Guidance
Can grant funds be used to pay staff who would normally telework but are unable to because they must care for children who are out of school?	<p>DCJ recommends that organizations be as accommodating as possible during this temporary national emergency in order to continue to be productive and meet the needs of your programs and those you serve. This may mean allowing staff to work on flexible schedules that permit them to accomplish both personal and professional responsibilities from home.</p> <ul style="list-style-type: none"> ● If work is not possible, use the leave policies as described in this document.
What should an organization do if staff are able to work but another agency on which they rely (e.g., a court) is closed?	<p>If staff may not be able to perform all of their normal day-to-day duties due to the closure of another agency, organizations should consider other related work that employees could focus on while the other agency is closed.</p> <ul style="list-style-type: none"> ● If other related work is not possible, use the leave policies as described in this document.
Can grantees modify grant program activities?	<p>Contact your DCJ grant manager to discuss the possibility of making temporary modifications to grant activities during the national emergency.</p>

All grants except SASP, VAWA, and SARP

Sexual Assault Services Program (SASP), Violence Against Women Act (VAWA), Sexual Assault Response Program (SARP)

Topic / Question	Grantee Guidance
Can grant funds be used to pay for telework equipment?	Yes, recipients who incur costs related to the performance of the award (e.g., the costs of providing telework equipment to employees who are working on the award) may be charged to their award.
Can I charge costs not normally chargeable to an award?	<p>Yes. Grantees who incur costs related to the cancellation of events, travel, or other activities necessary and reasonable for the performance of the award, or the pausing and restarting of grant-funded activities due to the public health emergency, may be charged to their award.</p> <p>In cases where charging of cancellation or other costs results in insufficient funds to eventually carry out the event or travel, you must contact your grant manager to discuss possible alternatives or changes to the scope of the project, if feasible.</p>
Can I extend my close-out period?	<p>Grantees needing additional time to complete closeout requirements (i.e., submitting final financial, performance, or other reports and deliverables required by the terms of their award) should contact their DCJ grant manager before the closeout deadline (45 days after the award end date) to request prior approval of an extension.</p> <p>Note: extending the closeout period does not extend the project performance period. You may not incur costs outside of the project period.</p>
Do I still need to submit my Financial Reports on the same schedule?	For grantees unable to meet original due dates, please contact your DCJ Grant Program Manager.
Do I still need to submit my Programmatic Reports on the same schedule?	For grantees unable to meet original due dates, please contact your DCJ Grant Program Manager.
Can I have an extension on my SAM registration?	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.
Can I have an extension on my Single Audit Submission?	<p>Single Audit Submission: In cases where OJP serves as the cognizant agency or has oversight for a recipient's audit, it will allow grant recipients that have fiscal year-ends through June 30, 2020 and that have not yet filed their single audits with the Federal Audit Clearinghouse as of March 19, 2020, an extension of six (6) months beyond the normal due date. Please note that recipients taking advantage of this extension would still qualify as a "low-risk auditee" under the criteria of 2 CFR § 200.520 (a)- Criteria for a low-risk auditee.</p> <p>All other questions should be direct to the DCJ Audit Compliance Monitor (Jane Pemberton at DCJ_Audits@state.co.us)</p>
Can I get an extension on my grant application submission?	Funding Opportunities with original application due dates between March 16th and March 31st have been extended by 2 weeks. DCJ will continue to monitor the situation and determine if additional adjustments to closing dates will be needed.

Office on Violence Against Women (OVW): SASP, VAWA, SARP

Topic / Question	Grantee Guidance
Can grant funds be used to pay for the cost of home office space and related utility costs for those employees who are teleworking during this national emergency?	No, the costs of home office space and related utility expenses are unallowable costs. We will monitor the situation for any additional information that may change this guidance.