

OCVS Grants – Questions and Answers during COVID-19

Services & Staffing:

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 grant manager as soon as they are available. If you are working on updating your policies and have questions, please contact your grant manager. If staff are on leave, timesheets will need to be provided stating leave was taken and charged appropriately to your OCVS 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.

1. Can VOCA-funded staff provide counseling sessions over the phone instead of in-person? **Yes.**
2. Will OCVS reimburse for hours that staff spend working from home? **Yes, as long as they are working on tasks related to the grant project.**
3. How should staff working from home document their hours? **Those staff should work with their supervisor to log their hours. You can work with your grant specialist if you have specific concerns about documenting time worked.**
4. Will OCVS continue to fund non-personnel costs (rent, utilities, etc.) if we temporarily reduce or suspend services? **Yes. Please notify your grant specialist if you reduce or suspend services.**
5. Some staff don't have work that they can bring home. Can I assign them work outside of their position description to work on from home? **Yes, as long as it furthers the goals of your grant-funded program, and are allowable activities per the grant. If you have questions about a specific job or project you would like a staff person to work on, contact your grant specialist.**
6. Can OCVS cover sick time for grant-funded staff? **Yes, as long as you follow your agency policies pertaining to paid leave and non-grant staff receive the same benefits.**
7. Can OCVS cover leave for staff if our agency has to temporarily close? **Yes, as long as you follow your agency policies and all staff (both Federally funded and non-Federally funded) are treated equally, we can continue to reimburse the OCVS grant funded project even if services are temporarily reduced.**
8. My sick-leave policy doesn't seem sufficient to cover the current situation, can I change it? **Yes. Work with your board to revise your policy, communicate the changes to your employees and your grant manager, and upload the new policy in Egrants.**
9. What do I do if I can't access Egrants remotely? **Work with your grant manager to make any needed modifications to your grant, and to modify any pending grant deadlines. We will be as flexible as possible during this situation.**

10. Is OCVS planning on releasing additional funds to help cover the costs of this crisis? **OCVS is not currently planning on releasing additional funds but will continue to monitor the situation and the needs of the agencies we work with.**
11. I have an expense related to the situation that was not included when I first wrote my budget, can OCVS help me move funds to cover it? **Yes. Your grant manager can help you identify funds to move in your budget and can submit a modification on your behalf if circumstances make it impractical for you to do it yourself.**
12. I'm worried that reducing or suspending services will negatively impact our PMTs/performance measures/goals, will OCVS be looking at these things when making future funding decisions? **There is no need to worry about grant benchmarks right now. OCVS will not let any changes to service levels during this crisis negatively impact anyone's funding through our office.**
13. If delivery of services is reduced (external presentations, outreach, education, etc.) how should I document this? Will an exception be made to my workplan/goals due to the pandemic? **A reduction in services should be documented in your program reports in Egrants.**
14. What if our agency's services look different than what we had planned? **As many of us are working remotely, services to victims will look different. OCVS 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 OCVS and non-OCVS funded staff. If your program will need to temporarily suspend services, please reach out to your grant manager.**

Paycheck Protection Program:

1. If a subrecipient receives a federally-guaranteed loan under the PPP to cover staff costs instead of its own funding, and later seeks reimbursement for those same costs from the SAA, here are the following considerations on whether this would be a duplication or supplanting issue:
Duplication occurs when the subrecipient uses VOCA Assistance funds to pay for specific costs already covered by other sources. For example:
 - If the subrecipient pays a staff position from the PPP loan then draws down VOCA funds to cover the same staff position, but never pays the loan back because it was forgiven, the subrecipient may have duplicated costs (or otherwise made an improper payment, see 2 C.F.R. 200.53), unless the forgiven loan funds are allocated to a different cost item. For example:
 - o The PPP loan paid salary for employee 1, but then reallocated to pay salary for employee 2, and then used the VOCA funds to pay for employee 1.
 - If the subrecipient pays back the loan, it would not be duplication.

Supplanting occurs when a subrecipient intentionally replaces its other state or local victim service funding sources with VOCA funding. For example:

- If a subrecipient uses VOCA funds to replace a PPP loan, then repays that loan instead of keeping the loan funds under the forgiveness provisions, it would not be supplanting.
- If a subrecipient uses VOCA funds to replace a PPP loan, then uses those loan funds for another expense (whether the loan is forgiven or not), it typically would not be supplanting because PPP funding is not specifically designated for victim service purposes.

2. If a subgrantee wanted to use the PPP pay for Personnel and then shift VOCA funds in their grant off of personnel into Emergency Victim Assistance funds to help additional survivors during the COVID-19 crisis, would that be allowable? **In general, as permitted by their state administering agency, a subrecipient may use PPP loan funds instead of VOCA Assistance funding for specific cost items (e.g., using PPP instead of VOCA funds for personnel, and using VOCA funds for other allowable costs) to best use available victim service funding under the circumstances. Subrecipients should follow the budget modification requirements of their respective VOCA Assistance state administering agency.**
3. Is the Paycheck Protection Program (PPP) considered match? **Regarding match, a subrecipient using funds from a private loan (whether forgiven later or not) is essentially a subrecipient's commitment of its own funds. Although the PPP loan is a federally guaranteed loan, OVC does not consider this loan (even if forgiven) to be funds "paid by the Federal Government under another Federal award" for purposes of match (see 2 C.F.R. § 200.306) – thus, such funds would be a permissible source of match for VOCA Assistance projects. (The subrecipient could not use VOCA funds to replace those loan funds and still count the loan funds as match).**
4. Could we utilize the PPP program to pay hazard pay? **Hazard pay is subject to the same requirements in 2 C.F.R. § 430 as any other type of compensation. As stated in OVW's COVID-19 guidance, 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 (Federal and non-Federal). As is the case for all compensation costs charged to an OVW award, any hazard pay must be reasonable, consistent with the recipient or subrecipient's policy, and applied in the same manner to both federally and non-federally 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.**
5. What other considerations should we keep in mind when considering hazard pay?
 - a. **Is hazard pay provided in accordance with your agency policies?**
 - i. **Does the policy indicate what work is considered eligible for hazard pay?**
 - ii. **Is it reasonable?**

- b. **Are staff who are receiving hazard pay performing VOCA-allowable activities?**
- c. **How is the agency going to track hazard pay?**

Modifications:

1. Will OCVS be flexible with modification timelines (i.e. made within the pay period)? **Yes, OCVS will be flexible. Please reach out to your grant manager via email for any proposed changes and OCVS can work with you to do a modification on your behalf or document approval via email.**
2. Will OCVS be flexible with the agencies to allow modifications for these unforeseen events? **Yes, we understand that these circumstances are outside of anyone's control and OCVS will do our best to address any grant related issues that arise from COVID-19.**
3. Can funds be moved from vacant positions to support direct services staff so that we don't lay them off? **Yes, with the understanding that the change is temporary and in response to the COVID-19 crisis. OCVS will include a special condition on the modification that indicates that the grant recipient has been approved to make emergency modifications to an existing personnel line item (or items) as a result of the COVID-19 crisis. That the modification is a one-time approval. Grant recipient must revert to the original approved budget as soon as reasonably possible, but no later than the start of the next grant year.**
4. We purchased TracFones for the hospitals to use if a victim survivor presents for a SANE, can those be charged to SAVS or VOCA? **Yes, work with your grant manager to ensure the costs are included in your budget.**
5. We need to purchase at least three months of ZOOM so that the SART meetings can continue. Are plan is to hold the SARTs more frequently during this time, and it's impossible for healthcare and many LE officers to attend if they have to travel to a location. Can that expense be charged to VOCA? **Yes, while cross-system coordination is a vital component to VOCA projects please ensure it is a grant allowable activity. Please work with your grant manager to ensure the costs are included in your budget.**
6. Can I make a modification to my One-Time funding in order to respond to staffing and client needs? **Yes. OCVS will make this exception to allow a modification to your recent one-time funding addition. We will only allow the modifications for emergency staffing and client needs as a response to COVID-19. Examples include: cell phones and plans for staff working remotely; emergency funds for clients, etc.**
7. Will the deadline to purchase equipment from the One-Time funding be extended? **Yes, we will allow an extension to purchase equipment through April 30, 2020. If purchases cannot be made before April 30th, OCVS will continue to be flexible. Please contact your Grant Manager.**

Purchased Travel:

1. My conference was cancelled. How will these expenses be paid for? **OCVS recommends that you seek credits or reimbursements for any pre-paid expenses. For airfare credits, OCVS will allow future conferences/trainings whether or not they are within the grant period. Please keep good records, receipts, etc.**

Reports (VOCA):

1. Can you provide the semi-annual questions from Egrants for VOCA on your website so that programs can share with staff work on at home? **Yes, the questions have been added to the VOCA webpage under Resources for Current Subrecipients.**
<https://www.doj.state.wi.us/ocvs/not-crime-victim/victims-crime-act-voca>
2. What should we do regarding OVC PMTs and our programs limited ability to enter information into Osnium remotely? **Please make a comment on OVC PMT report that your agency had to reduce services due to COVID-19. This has occurred before on a limited basis and people have just noted the unforeseen circumstances and how it affected their reports and numbers. As this is a nationwide issue, OVC should understand and OCVS would support our agencies in that assertion that the ability to enter all information into Osnium was outside their control.**
3. How will program reports be handled? **OCVS has posted the semi-annual program report questions on our website. Please gather information to the best of your ability for these reports. If the report is impacted by the COVID-19 pandemic, please indicate this on your report. The program report is due in Egrants on June 30, 2020.**
4. Are OVC PMT's still required? **Yes, OVC PMT and data tracking is a federal requirement. If the COVID-19 pandemic impacts your numbers, please indicate this in your report. As we talk about creative ways for your staff to continue working on VOCA allowable projects while away from the office, coming up with a new reporting procedure for your agency may be an option.**

Match

1. We're concerned about our agency's ability to meet the match requirement given the reduction in volunteers and/or services. **For the time being, try not to be too concerned with match. Report what you can on the fiscal reports. In June or July, OCVS will work with subgrants who are behind on match to determine if a revised partial match waiver request needs to be submitted for those with currently approved partial match waiver or if a partial match waiver request needs to be submitted for those without an existing approved partial match waiver request. OCVS really wants our subgrants to be able to focus on the crisis at hand and we have time to work on some of the grant concerns later. OCVS may also issue emergency match waivers to those agencies that need it.**
2. Volunteer utilization has been suspended due to the pandemic; this will reduce volunteer hours for match. Am I able to submit a modification with another match source? **Yes, communicate**

with your grant manager and financial specialist as you identify these gaps. A modification may be submitted once you identify another match source.

Grant Extensions:

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.

VOCA

1. Will extensions be granted for VOCA subgrants for the 10/1/2019 to 9/30/2020 grant period? **No, unfortunately OCVS cannot grant extensions for VOCA subgrants as OCVS cannot get extensions at the federal level for VOCA.**

VOCA Discretionary Training, CORE Training, and TA Grants

1. Will extensions be granted for Training, CORE, and TA grants provided through OCVS for the grant period 1/1/2020 to 9/30/2020? **Yes, OCVS will allow extensions through the end of the calendar year (12/31/2020) for Training, CORE, and TA grants as there are different grant regulations than VOCA subgrants that provide direct services.**