

March 26, 2020

Dear OVW Award Recipient:

On March 19, 2020, the Office of Management and Budget (OMB) issued OMB memorandum [M-20-17](#), “*Administrative Relief for Recipients and Applicants of Federal Financial Assistance Directly Impacted by the Novel Coronavirus (COVID-19) due to Loss of Operations*,” affording federal awarding agencies with additional flexibilities to provide administrative relief to funding recipients affected by the loss of operational capacity and increased costs due to the COVID-19 national emergency. On March 17, 2020, the Office on Violence Against Women (OVW) [announced](#) several flexibilities for grantees under existing authorities, and on March 19, 2020, OVW [issued](#) additional [guidance](#) to grantees on using grant funds to pay staff in certain circumstances outside normal business operations. In the list below, OVW restates some of these flexibilities and provides additional short-term relief pursuant to M-20-17 for various administrative, financial management, and audit requirements under 2 C.F.R. Part 200, *Uniform Administrative Requirements, Cost principles and Audit Requirements for Federal Awards*. Please keep in mind that in accordance with M-20-17, exceptions provided pursuant to its authorities are time-limited and the flexibilities afforded to federal awarding agencies will be reassessed by OMB within 90 days of the issuance of its memo.

**Notice for Grant Recipients:** Until further notice, unless otherwise specifically stated below, OVW is suspending the requirements for grant recipients to seek prior approval and to process Grant Adjustment Notices (GAN) in relation to the items discussed below that would normally require prior approval and/or a GAN. Grantees should maintain a copy of this guidance with any other appropriate records and cost documentation in their grant files (as required by 2 C.F.R. §§ 200.302, 200.333).

**Notice for Cooperative Agreement Recipients:** While cooperative agreement recipients may benefit from the administrative flexibilities outlined below, OVW is still requiring prior approval and a GAN for any cost or project changes related to cooperative agreement awards. Recipients should contact their OVW program specialists promptly to discuss anticipated changes.

**Notice for Pass-Through Entities:** In keeping with its responsibility as a pass-through entity (as applicable) to ensure that subrecipients receive any necessary guidance and information on requirements a subrecipient would need to meet so that the recipient may meet its own responsibilities under the award, the recipient should take appropriate

measures designed to ensure that subrecipient records (including leave policies) and cost documentation pertinent to the award are maintained consistent with this notice (and as required consistent with 2 C.F.R. Part 200).

### **Flexibilities and Short-Term Relief for Recipients Impacted by COVID-19**

1) Allowability of costs not normally chargeable to awards: OVW will allow recipients that incur costs related to the cancellation of events, travel, or other activities necessary and reasonable for the performance of the award (e.g., the costs of providing telework equipment to employees who are working on the award), or the pausing and restarting of grant-funded activities due to the public health emergency, to charge these costs to their award.

OVW will allow recipients to charge full cost of cancellation when the event, travel, or other activities are conducted under the auspices of the award. In cases where charging of cancellation or other costs results in insufficient funds to eventually carry out the event or travel, please contact your program specialist to discuss possible alternatives or changes to the scope of the project, if feasible. Changes in scope require a GAN in all cases, but, as stated above, only cooperative agreement recipients must submit a GAN to charge these costs to the award.

2) Allowability of salaries and other project costs: OVW will allow recipients to continue to charge salaries and benefits to their awards consistent with the recipients' policy of paying salaries and benefits under unexpected or extraordinary circumstances from all funding sources (Federal and non-Federal). As outlined in 2 C.F.R. § 200.431(a) and (b), benefits may include the costs of leave (“regular compensation paid to employees during periods of authorized absences from the job, such as for annual leave, family-related leave, sick leave ...

administrative leave, and other similar benefits”), as long as they are provided under written leave policies.

As stated in OVW's March 19 [message](#) and attached [frequently asked questions](#), OVW encourages recipients to review and update (if necessary) their written leave policies to address “unexpected or extraordinary circumstances.” Recipients are required to maintain copies of the leave 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 during interruption of operations or services. Unless your organization has

outstanding audit recommendations from the Office of the Inspector General (OIG) or monitoring findings from the Office of Justice Program’s (OJP) Office of the Chief Financial Officer (OCFO) requiring DOJ approval of your human resources policies, you do not need to submit a GAN to implement these policies.

3) Award extensions: As OVW [announced](#) on March 17, 2020, in accordance with the Part 200 Uniform Requirements (2 C.F.R. Part 200, as adopted by DOJ) and consistent with the [DOJ Grants Financial Guide](#), most OVW awards may be eligible for no-cost extensions. See the [DOJ Grants Financial Guide](#) for additional information and consult with your OVW program specialist as needed. Requests for no-cost extensions will be processed via GAN. It is OVW’s intention that no OVW grantee is penalized as a result of this national emergency. We will work with grantees to ensure that there is sufficient time to complete grant goals and objectives once this national emergency has passed without affecting eligibility for continuation funding.

4) Closeout extensions: Recipients 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 program specialist before the closeout deadline (90 days after the award end date) to request prior approval of an extension. Please note that the Grants Management System (GMS) will continue to send automatic closeout notifications, which can be disregarded.

5) Financial reporting requirements: For grantees unable to meet original due dates, OVW is allowing delayed submission of up to 60 days for Federal Financial Reports for the reporting period January 1 – March 31, 2020. GMS will continue to send automatic delinquency notifications, which can be disregarded. However, grant funds will not be withheld unless the FFR has not been submitted by June 30. Please note that at this time, due dates for reports for the remainder of the fiscal year are unchanged.

SF-425 Federal Financial Reports—Due Quarterly			
Reporting Period	Original Due By	Due Date	Delinquent After
	Date	Extended	
January 1–March 31	April 30	June 30	June 30
April 1–June 30	July 30	N/A	July 30
July 1–September 30	October 30	N/A	October 30

6) Grant Payments: As OVW [announced](#) on March 17, 2020, the Grant Payment Request System (GPRS) will remain in service to accept and process grant payment requests.

7) Progress reporting: For grantees unable to meet original due dates, OVW is allowing delayed submission of up to 60 days for progress reports due March 30, 2020 (the new due date is May 29, 2020). GMS will continue to send automatic delinquency notifications, which can be disregarded. Please note that at this time, due dates for reports for the remainder of the fiscal year are unchanged but OVW may re-visit whether to extend these deadlines at a later date.

8) Programmatic and financial monitoring: As OVW [announced](#) on March 17, 2020, until otherwise notified, all planned on-site monitoring will be conducted as remote monitoring or postponed for a later date. You will be contacted by your OVW program specialist and/or financial staff of OJP's OCFO to make alternative arrangements. If your organization is unable to participate in remote monitoring due to operational limitations, you may request postponement until a later date.

9) OVW-sponsored conferences, events, and other gatherings: As OVW [announced](#) on March 17, 2020, for OVW-sponsored conferences, meetings, trainings, and other gatherings that are scheduled in the near term (the next eight weeks), cooperative agreement recipients should work with their OVW program specialists to set up meetings as virtual events or postpone or cancel meetings. For events planned farther out, please work on a case-by-case basis with your program specialist; however, OVW will revisit the time period for across-the-board postponements and provide further guidance as needed, recognizing that the process of returning to normal operations will be phased and may vary by jurisdiction and organization. With prior approval and a GAN, OVW will allow cooperative agreement recipients to charge full costs incurred for postponing or cancelling an event, travel, or other activities under the award. In cases where charging of cancellation or other costs results in insufficient funds to eventually carry out the event or travel, please contact your program specialist to discuss possible alternatives or changes to the scope of the project, if feasible.

10) SAM registration: Sixty-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.

11) Single Audit Submission: In cases where the Department of Justice's Office of Justice Programs 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 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.

12) Solicitations: As OVW [announced](#) on March 17, 2020, some OVW solicitation due dates have been extended as a result of this national emergency. See OVW's website for current solicitation closing dates: <https://www.justice.gov/ovw/open-solicitations>. OVW will continue to monitor the situation and determine if additional adjustments to closing dates will be needed. [Grants.gov](#) and GMS remain open to continue to accept applications.

13) Indirect Cost Rates: OVW may allow recipients to continue to use currently approved indirect cost rates to charge indirect costs to their awards. For indirect cost rate negotiations for which OVW is the cognizant agency, OVW will consider requests to extend current indirect cost rates for one additional year or to extend the submission deadlines for indirect cost rate proposals. Recipients should contact OVW's Grants Financial Management Division (GFMD) to submit such requests or with questions about indirect cost rate flexibilities.

Please direct questions about this guidance to your OVW program specialist, or to OVW's GFMD at [OVW.GFMD@usdoj.gov](mailto:OVW.GFMD@usdoj.gov) or 888-514-8556.

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