

CORONAVIRUS DISEASE (COVID)-19 GRANTS FREQUENTLY ASKED QUESTIONS

March 30, 2020

The purpose of this document is to provide guidance to the ACL recipient community in response to questions related to Coronavirus Disease 2019 (COVID-19). The list of Frequently Asked Questions below address questions raised by our recipient community. We will continue to provide updated guidance and information as it becomes available.

1. *If my System of Award Management (SAM) registration is not active at the time of application, do I need to request an extension?*

The General Services Administration (GSA) will automatically issue a 60 day extension to entities with SAM expiration dates between March 19, 2020 and May 17, 2020.

2. *Is there guidance for the temporary reassignment of state, tribal, and local personnel during a declared federal public health emergency?*

A Governor of a state, local or tribal organization or their designee may request to temporarily reassign state and local public health department, tribal, or agency personnel funded in whole or in part through programs authorized under the PHS Act to immediately address a public health emergency in the state or Indian tribe during the period of the emergency. Detailed information, including Guidance for Temporary Reassignment of State and Local Personnel during a Public Health Emergency, is available on the [Assistant Secretary for Preparedness and Response \(ASPR\)](#) website. To request the temporary reassignment of personnel, a state governor, tribal leader, or designee must complete the Request for the Temporary Reassignment of State, Tribal, and Local Personnel during a Public Health Emergency Declared by the HHS Secretary and submit it to TemporaryReassignment@hhs.gov. Please ensure that the authorizing program legislation does not prohibit this provision.

3. *Can recipients redirect funds within their cooperative agreement to COVID-19 activities?*

Redirection of funds may be allowable when the funds that will be redirected for COVID-19 activities are within the scope of the current award and the award's statutory authority and do not duplicate activities with other ACL funded and federally funded activities. Please contact your assigned Project Officer for further guidance.

4. Will recipients be reimbursed for costs incurred for cancelled meetings, travel, conferences?

On March 19, 2020, the Office of Management and Budget (OMB) issued Memorandum

M-20-17 that provides administrative, financial management, and audit reporting relief for recipients and applicants of federal financial assistance directly impacted by COVID-19. ACL can allow recipients to charge costs to the award such as the cancellation of events, travel, or the pausing and restarting of grant-funded activities due to the public health emergency. Recipients are required to maintain records and documentation to substantiate the cost.

5. Can recipients charge salaries to federal awards when personnel are not able to work due to COVID-19 office closures or similar disruptions?

On March 19, 2020, the Office of Management and Budget (OMB) issued Memorandum M-20-17 that provides administrative, financial management, and audit reporting relief for recipients and applicants of federal financial assistance directly impacted by COVID-19. Recipients may continue to charge salaries and benefits to currently active federal awards consistent with the recipients' policy of paying salaries (under unexpected or extraordinary circumstances) from all funding sources. Recipients are required to maintain records and documentation to substantiate the cost, including reference to the recipients' salary policy.

6. Will grant application submission deadlines be extended?

At this time, the submission deadline for ACL NOFOs remain unchanged. We encourage you to submit an application prior to the published deadline in Grants.gov. We will continue to monitor and assess if deadlines for grant application submissions need to be extended. Please contact your Program Officer for additional guidance.

7. Will recipients be granted an extension of financial and other reporting requirements?

ACL will allow up to a three (3) month extension, beyond the normal due date for the submission of their financial and performance reports. The reports must be submitted at the end of the postponed period. Recipients should contact their Project Officer for additional guidance.

8. Extension of currently approved indirect costs rates

If exercising this flexibility, recipients should contact their Project Officer for further guidance.

9. Extension of Closeout

Awarding agencies may allow a recipient to delay submission of any pending financial, performance and other reports required by the terms of the award for the closeout of expired projects. Recipients should contact their Project Officer for further guidance.

10. *Extension of Single Audit Submission*

Both sets of guidance apply to this flexibility but differ with regard to the amount of time allowed for an extension. OMB M-20-17, which applies to federal awards impacted by COVID-19 provides a 6-month extension whereas OMB M-20-11 applies to federal awards issued in response to COVID-19 provides a 12-month extension. Recipients should contact their Project Officer for further guidance.

11. *Prior approval requirement waivers*

ACL is reviewing the OMB and HHS guidance and exploring possible waivers for prior approvals that may reduce administrative burden but still maintain the integrity of federal funding. Recipients should contact their Project Officer for further guidance.

12. *Waiver for Notice of Funding Opportunities (NOFOS)*

ACL will publish emergency NOFOs for less than 30 days, on a case by case basis. Recipients should contact their Project Officer for further guidance.

13. *No-cost extension on expiring awards*

For awards that are active as of March 31, 2020 and scheduled to expire prior or up to December 31, 2020, ACL will grant an extension for up to twelve (12) months as long as the extension is not prohibited by statute, regulation, or terms and conditions of the award. No cost extension requests must include a justification for the request, which should include sufficient explanation regarding the impact of COVID-19 on program activities.