



U.S. Department of Justice

Office on Violence Against Women

Washington, DC 20530

19 March 2020

Dear OVW Award Recipient:

As we continue to deal with the COVID-19 national emergency, OVW is working to respond to the many questions this national emergency has raised for our award recipients.

OVW strongly encourages you to 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 and you may want to consider making such policies effective on the date such circumstances began, if permissible under your laws, rules, and policies.

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 Grant Adjustment Notice (GAN) to implement these policies.

Attached you will find information, in question and answer format, regarding the use of federal grant funds to pay staff, in certain circumstances outside their normal business operations.

As you know this has been and continues to be a very fluid situation. As more guidance becomes available, we will endeavor to relay information affecting your grant operations as quickly as possible.

We sincerely appreciate your continued partnership and dedication to this important work.

Sincerely,

A handwritten signature in blue ink that reads "Laura L. Rogers".

Laura L. Rogers
Acting Director



COVID-19 FAQs for OVW Grantees Regarding the Payment and Use of Leave for Grant-Funded Staff

1. Question: Can grant funds be used to pay staff if they are teleworking?
Answer: Staff may be paid with grant funds while teleworking if your organization has an established policy in place allowing staff to telework. If your organization does not currently have a telework policy, we recommend that you follow the necessary procedures to establish a policy for your organization as quickly as possible. Please keep in mind that the policy must be consistent for both federally and non-federally funded staff positions. A Grant Adjustment Notice (GAN) is not required to allow grant-funded staff to telework.
2. Question: Can we use grant funds to pay staff if they take leave?
Answer: Programs should continue to use their current leave policies and pay staff accordingly. It is important to remember that both federally funded and non-federally funded positions must be treated consistently.
3. Question: Can grant funds be used to pay staff if they are unable to telework because of the kind of work they normally perform?
Answer: 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.
4. Question: Can grant funds be used to pay staff who are on administrative leave?
Answer: Programs should continue to use their current leave policies and pay staff accordingly. If your organization does not currently have an administrative leave policy, we recommend that you follow the necessary procedures to establish a policy addressing administrative leave, including administrative leave in the case of unexpected or extraordinary circumstances, for your organization as quickly as possible. You may consider making the policy effective on the date these circumstances began, if permissible under your laws, rules, and policies. It is important to remember that both federally funded and non-federally funded positions must be treated consistently.
5. Question: 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?
Answer: OVW 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.

6. Question: Can grantees modify grant program activities?
Answer: We recommend that grantees contact their OVW program specialists to discuss the possibility of making temporary modifications to grant activities during the national emergency.
7. Question: What should an organization do if staff are able to work but another agency on which they rely (e.g., a court) is closed?
Answer: 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.
8. Question: 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?
Answer: 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.