



**ILLINOIS
CRIMINAL JUSTICE
INFORMATION AUTHORITY**

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ICJIA Grantee FAQs – COVID-19 Emergency
Updated 12/22/20

Q: Will grant funding continue in the event of a reduction of grant activities as a result of COVID-19?

A: Yes. ICJIA is committed to maintaining capacity and continuing grant funding. Budget-approved, grant-funded staff should continue to be paid during the pandemic as deemed appropriate by the grantee agency or organization.

Update – OMB memo M 20-26 extended the administrative relief for awarding agencies to allow recipients to continue to charge salaries and benefits to awards while they developed capabilities and transitioned to working remotely and/or developed strategies to work safely in the workplace. This extension expired September 30, 2020. After that date, it was necessary to resume activities supported by the award.

Q: Can grant funds be used to pay staff if they are teleworking?

A: Staff may be paid with grant funds while teleworking at agencies/organizations with established telework policies. ICJIA recommends that agencies and organizations without a telework policy in place develop one as soon as possible. Please keep in mind that the policy must be consistent for both grant-funded and non-grant funded staff positions.

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 include program planning, staff development (including taking advantage of remote training opportunities), catching up on administrative work, internal capacity building, and performance reviews.

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Q: Will ICJIA reimburse for contractual expenses?

A: ICJIA will reimburse for expenses and services rendered in accordance with the terms of grantees' contracts. Grantees should not enter into contracts for services or

employment that cannot be performed within the performance period of the contract. Note that these restrictions apply to contractual expenses, not personnel expenses in grant agreements. During this period of mandated social distancing, grantees should be flexible in allowing contractors and staff to work remotely or virtually, where feasible.

Q: Can we apply for a no-cost extension?

A: ICJIA will consider extensions of grant agreements based on a justified need and that do not violate any state or federal restrictions. Please note that awarding agencies do not have discretion to permit extensions of any federal grant award's period of performance beyond the statutory period, which typically three years.

Q: Our ICJIA grant includes furniture and other items that need to be installed by the end of May to qualify for reimbursement. With our agency's closure lasting an undetermined amount of time, we may not be able to have those items installed or received in time. Would it be possible to have those items obligated with a purchase order and installed sometime after our return (and possibly after May) and still qualify for reimbursement?

A: ICJIA will reimburse for furniture/installation that arrives and is completed prior to the end of the performance period. Therefore, purchases should be made as soon as possible to ensure timely delivery and installation. The terms of the grant contract agreement state all work must be completed by the end of the grant performance period.

Q: Will ICJIA reimburse indirect costs?

A: Yes, ICJIA will reimburse for indirect cost expenses incurred during the time of service reduction.

Q: Our sub recipient is looking at a HIPPA-compliant free telepsych site to use in order to continue to see clients during the Coronavirus outbreak. Do they have permission to do this type of service during the pandemic?

A: Yes. Agencies should follow their own policies and procedures in the furtherance of their staff's, and clients' health and safety. Provided these standards are followed, agencies should do what is clinically appropriate to accommodate their clients during the pandemic.

Q: The fiscal report requires a signature. What if we are unable to obtain one or two signatures by the due date?

A: Signatures are required; however, 60-day deadline extensions are in place for financial and programmatic reports due in March and April 2020. A scanned copy of the signature page will suffice.

Update – OMB memo M20-17, which allowed grantees to delay submissions of financial and performance reports, expired June 16, 2020. Reports are due on the 15th of the month following the period being reported. Scanned copies are acceptable.

Q: If grant-funded staff have been advised by a doctor not to report to work due to medical conditions, can grant funds still, pay their salary?

A: Yes. Grant-funded staff should be treated in accordance with agency staff policies. If your agency requires staff on FMLA, sick, or other leave to receive pay, grant funds may be used to cover the pay for staff members listed in your approved budget.

Q: Will ICJIA consider retroactive approval for budget revision requests submitted after the pandemic ends for expenses incurred during the crisis but prior to the end of the grant period?

A: Yes. Budget revision requests submitted at a future date, but prior to the end of the grant period, for allowable costs will be considered. Request must include necessity of costs going back prior to the submission of the request and all other information required for a budget revision. Costs may not be charged to the grant or included in fiscal reports until the budget revision is approved by ICJIA.

Update – OMB memo M20-17, which waived prior approval requirements, expired June 16, 2020. All budget revisions must now receive prior approval.

Q: Will ICJIA allow agencies to purchase of gift cards for emergency food and cleaning supplies caused by the corvid-19 health crisis?

A: Yes. Submit a budget revision request explaining the transfer of grant funds in one budget line to cover the cost of the gift cards. Include explanation of need, how the gift card distributions will be tracked, and items purchased with them by clients.

Q: Will ICJIA allow grantees to use the Families First Coronavirus Response Act (FFCRA) and the Paycheck Protection Program (PPP) federally guaranteed loan under the PPP to cover staff costs instead of grant funding for program costs ?

A: No. Grantees should not seek loans for costs covered by a grant. Doing so diminishes funding available for business/services that are not grant funded. More information on this topic is forthcoming.

Q: We would like to provide our transitional housing clients with cleaning supplies directly related to COVID-19. Our current budget addresses incidental medical needs and some house cleaning resources, but the budget does not expressly state that sanitizing wipes, Lysol, bleach, or masks are allowable purchases. Are we able to purchase these items so that our residents are not burdened with the extra cost? If so, should we submit a budget revision?

A: Cleaning supplies may be purchased under the Supplies line of an approved budget. Send a formal letter to your grant monitor requesting cost inclusion of those cleaning supplies with an explanation of need and specific items to be purchased.

Update – OMB memo M20-17, which waived prior approval requirements, expired June 16, 2020. All budget revisions must now receive prior approval.

Q: As COVID19 takes hold, outreach workers are taking on an intensified risk as first responders in terms of violence mitigation and pandemic public awareness. As we continue to do everything possible to guarantee outreach worker safety with PPE, we also believe it is appropriate to accommodate their increased risk to COVID19 exposure by compensating hazard pay. To what extent will ICJIA grant permission for this expenditure? What is the process?

A: As of this writing, ICJIA hasn't yet received any directive or guidance from the Federal Office of Management and Budget or the State on the allowability of the use of lapsing grant funds for hazard pay related to COVID-19. At this point, ICJIA is unable to approve this expense.