



North Carolina Department of Public Safety

Governor's Crime Commission

Roy Cooper, Governor
Erik A. Hooks, Secretary

Robert Evans, Chairman
Caroline C. Valand, Executive Director

To: Governor's Crime Commission Award Recipients

From: Caroline Valand, Executive Director
NC Governor's Crime Commission

Subject: Covid-19 Update #2

I hope that everyone is continuing to remain safe and healthy.

We received additional guidance from the Department of Justice (DOJ) Office of Justice Programs (OJP) for recipients (and subrecipients) dealing with COVID-19's impact on federally-funded grant programs. Please keep in mind that these exceptions from the federal government are time-limited and will be reassessed by the U.S. Office of Management and Budget (OMB) within the next 90 days.

1) Allowability of costs not normally chargeable to awards

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 can be charged to the funded project(s).

Governor's Crime Commission (GCC) subrecipients may be reimbursed for the cost of cancellation when the event, travel, or other activities were to be conducted under the auspices of the grant. Subrecipients will need to provide documentation to the Grant Manager (GM) for the project to support all requests.

2) Allowability of salaries and other project costs

Subrecipients may continue to charge salaries and benefits to their projects consistent with the organizations' 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. If your agency has a policy that allows payment of administrative leave to employees, temporary staff, and contractors, then they can continue to be paid under that leave policy. Just as for salaries paid during normal times, the grant award would pay their allowable share of those costs.

MAILING ADDRESS:
4234 Mail Service Center
Raleigh, NC 27699-4234

www.ncdps.gov



OFFICE LOCATION:

1201 Front Street
Raleigh, NC 27609
Phone: 919-733-4564
Fax: 919-733-4625

If your agency does not have such policy, OJP (and GCC) strongly encourage subrecipients to review and update (if necessary) their written leave policies to address “unexpected or extraordinary circumstances.” Subrecipients are required to provide copies of their leave policies and cost documentation (as required by 2 C.F.R. § 200.302, 2 C.F.R. § 200.333, and 2 C.F.R. § 431(b)(1)) to substantiate the charging of salaries and benefits during interruption of operations or services. GCC grant managers will need your updated “leave policy for unexpected or extraordinary circumstances” (either submitted with your reimbursement request or sent beforehand) to substantiate the salaries and benefits that you paid during the COVID-19 emergency.

3) Grant Payments

The federal Grants Payment Request System (GPRS) is remaining in service to accept and process grant payment requests. As Department of Public Safety (DPS) Fiscal operations are also continuing, we have no reason to expect delays in processing subrecipient reimbursements. We still encourage all subrecipients to submit reimbursements in a timely fashion and to “catch up” on submitting any previously due reimbursements – in case this situation changes.

4) Progress reporting and performance measurement reporting

For grantees unable to meet original due dates, OJP is allowing delayed submission of up to 60 days for progress and performance measure reports due in March and April 2020. Please note that at this time, due dates for some March/April reports are unchanged and due dates for all reports for the remainder of the fiscal year are unchanged. Based upon this guidance, GCC staff has developed the following table listing due dates for subrecipient reports. Please refer to the type of grant award(s) that you have to determine if any of your reporting dates are affected. If you have any questions about report due dates, please contact your GCC planner.

| Federal Funding Program | Type of Report | Normal Due Date from Subrecipient to GCC | Normal Due Date from GCC to OJP | Extended Due Date from Subrecipient to GCC | Extended Due Date from GCC to OJP |
|-------------------------|-------------------------|---|---------------------------------|--|-----------------------------------|
| Byrne JAG | PMT (6 months) | April 10th | Same | N/A | N/A |
| OVW - STOP | STOP Progress Report(s) | January 30 th and 30 days following the end of their project | April 30th | N/A | N/A |
| VOCA | PMT (Jan-Mar) | April 30 | May 15 | N/A | N/A |

There are no reports due for the following federal grants during March or April. Therefore, reports for projects funded with the following grants are not impacted by this exception.

JAG-PREA

John R. Justice

Juvenile Justice Title II

Juvenile Justice PREA

NCHIP

Paul Coverdell

RSAT

SORNA

We will continue to provide you with updated information as we receive it from our federal partners. Thank you for your patience during this time. We appreciate your ongoing commitment to your missions and to the safety of all Americans.

