

Frequently Asked Questions Regarding Grant Fund Allowances in the Response to COVID-19

These frequently asked questions (FAQs) are provided by the Oregon Department of Justice, Crime Victim and Survivor Services Division to the recipients of its state and federal grant funds. The FAQs are regarding the use of grant funds and COVID-19 response. These FAQs are updated routinely. Also visit [CVSSD's COVID-19 Information for Grantees](#) page.

	<i>Question</i>	<i>Answer</i>
1.	What happens to our grant funds if we need to close our office and/or shelter or reduce the level of service/response available?	Grant funds will be unaffected by these changes in relation to your organization's COVID-19 response. We encourage you to make decisions based on the safety of your staff and the victims you serve. Organizations may want to consider what work can be done remotely even when physical office spaces are closed or in person responses are limited. We encourage you to communicate with your community partners to ensure clear understanding of service availability in your community. If possible, take advantage of multidisciplinary opportunities such as your SART or child abuse team relationships to work towards a collaborative response in these times when resources are becoming extra stretched.
2.	What costs can our grants help cover in association with our COVID-19 response?	<p>VOCA, ODSVS, CFA, and CAMI MDT funds can all be used to cover allowable expenses, to include the following costs:</p> <ul style="list-style-type: none"> • <i>Out of the ordinary staff leave costs associated with having to close facilities such as the office and/or shelter, or due to illness.</i> Any personnel leave costs paid for with grant funds should be consistent with personnel leave costs paid with other funds and should align with the policies of your organization. If you do not have policies that cover this scenario, you should develop them as soon as possible. • <i>Cleaning supplies.</i> • <i>Professional cleaning services to clean the office and/or shelter.</i> These costs should be reasonable; we encourage grantees to seek out at least 3 bids to help determine reasonableness, if possible. Contracts under \$10,000 do not need to be pre-approved by CVSSD. • <i>Stocking up on food and other necessary supplies for shelters and/or clients staying in hotels as a form of emergency shelter.</i> <p>An amendment may be required to shift funds. Due to these unusual circumstances, we will allow these amendments to be done after the fact.</p> <p>CVSSD may request verification of expenses within any financial reporting period. Proper documentation of expenses (invoices, receipts, payroll ledger, general ledger, etc.) is expected. Refer also to Questions #5, #7, #8, #9, #10, #11, #14 and #16 of this FAQ document.</p>

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3.	What happens if a training we've already paid for with grant funds is cancelled?	<p>For any federal funds, if the organization conducting the training offers a ticket for a future event, please be sure that the future training date is within the grant period from which your payment came. Federal funds cannot be used to cover the cost of training that falls outside the award period. Given that, we encourage you to seek a refund if a grant-funded training is cancelled. If you do receive a refund, be sure to credit the grant on your books and on your next financial report for that grant.</p> <p>You can list it as a credit by either reducing the amount of the expenditures in the training line item by the amount refunded, or entering the costs as a negative dollar amount if there are no other training costs to include on the financial report. Grantees are encouraged to consider holding off on booking any new training occurring within the next few months, or at least ensuring that any expenditures are fully refundable. Given the high chance of cancellation at this time and our need to be good stewards of the funds, CVSSD may elect to not reimburse cancelled training costs booked from this point forward through the next few months. You incur these expenses at your own risk.</p> <p>If you incurred travel expenses in anticipation of a future training that has now been cancelled, those refunds should be treated in a similar way, by crediting the amount back to the grant.</p> <p>If the vendor will not give a refund, you must obtain documentation from the vendor that a refund was not issued. Submit this documentation with the financial report in which the expense is reported.</p>
4.	What if we have fewer volunteer hours to provide as match for our grant award as a result of COVID-19?	<p>For VOCA funds, if volunteer hours are decreasing because of the corona virus and that affects your ability to meet your match, you can seek a match waiver from CVSSD. Please reach out to your Fund Coordinator to discuss this.</p>
5.	As a part of our COVID-19 response, can we issue gift cards to clients who need food and other essential supplies?	<p>Yes. CVSSD's VOCA allowable and unallowable cost guidance permits the use of gift cards <i>"when the use of a credit or charge process is not feasible...If a grantee determines that the use of gift cards is necessary...the grantee must ensure effective control and accountability is maintained over gift cards, including tracking and safeguarding of cards and ensuring that cards are used solely for authorized purposes..."</i> The policy also says, <i>"An agency policy must be submitted and approved prior to the purchase of any gift cards..."</i></p> <p>When possible, CVSSD recommends following the organization's current gift card policy.</p>

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		For COVID-19 response, CVSSD waives the requirement that a policy be submitted and approved prior to the purchase of gift cards. Grantees must still notify CVSSD by email to confirm that the organization's/agency's written policies have been/will be updated to include an exception under these special circumstances for gift card purchases and use. The policy must include assurances that gift cards are tracked and safeguarded. CVSSD may ask the grantee to see the written policy about gift cards at any time.
6.	Will CVSSD extend deadlines for financial and progress reports if an office must close?	Yes. CVSSD will extend deadlines for submission of financial and progress reports if an office must close or experiences reductions in staff due to COVID-19. Contact your fund coordinator to request an extension of reporting deadlines. Watch for CVSSD correspondence regarding deadline extensions that are applicable to everyone. Refer also to Question #2 and Question #14 of this FAQ document.
7.	Can we use emergency services money to assist survivors in paying for childcare services?	Yes. Visit Oregon Department of Education, Early Learning Division's COVID-19 response to learn more about available childcare services to essential workers . It is recommended that families for whom childcare is not absolutely necessary should keep their children at home. Grantees may only use emergency services funds for childcare expenses if those expenses are directly related to a person's victimization. Grantees must provide a written explanation in the financial report regarding the childcare expense to justify the special circumstances for the expense.
8.	Can we provide survivors with alternative emergency shelter accommodations such as hotels rather than fill shelter beds to capacity?	CVSSD recommends following the organization's current shelter policy. It is generally recommended that organizations modify existing or develop new policies to reflect changes in practice due to COVID-19 response.
9.	Can advocates use their personal rewards cards to place online orders for groceries and other essential items on behalf of survivors?	Yes. CVSSD recommends following the organization's current personal card use policy. It is generally recommended that organizations modify existing or develop new policies to reflect changes in practice due to COVID-19 response.
10.	Can we repurpose competitive grant funds to assist survivors impacted by COVID-19?	<p>Typically, CVSSD does not allow changes that would alter the original purpose and scope of a project that is funded through a competitive award process. CVSSD may make exceptions during the response to COVID-19. Please contact your fund coordinator to discuss changes to the project activities and grant budget that you are considering. Also refer to Question #2 of this FAQ document.</p> <p>If you receive any VOCA-Competitive or VOCA-FI awards administered by CVSSD, you are usually restricted to using those</p>

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		<p>funds for the scope and purposes detailed within the competitive grant application. For purposes of COVID-19 response, CVSSD will suspend that requirement and allow VOCA-Competitive grant recipients <u>to repurpose those competitive funds</u> in order to maintain essential services for victims and survivors. This exception applies only to <u>VOCA</u> competitive funding and still requires all expenses be VOCA ALLOWABLE expenses. If you need to repurpose these funds for essential services during the COVID-19 response, please reach out to your fund coordinator with information needed to document the change.</p> <p>If you identify direct service needs, or innovations to support direct services, you have discretion to redirect CAMI RSP funds to that work during this crisis. Any expenses must still be allowable under CAMI (e.g. child abuse assessment, advocacy, or treatment). If changes would impact delivery of collective projects, this should discuss as a group. Given that training delays may mean that both federal and state grant training deliverables may not be met, it is reasonable to use funds for more urgent needs.</p>
11.	Can CVSSD grant funds be used to reimburse individual staff members for the cost of increased internet bandwidth (speed) to their home or remote access site?	Yes. CVSSD recommends following the organization’s current remote access policy. It is generally recommended that organizations modify existing or develop new policies to reflect changes in practice due to COVID-19 response.
12.	Can we use a video conferencing platform to hold remote multidisciplinary team (MDT) meetings?	Yes, as long as the platform you choose and your team’s practices related to protecting victim information are VOCA compliant. This means that the platform and your process protect victims’ confidentiality (the same requirement that applies to in person MDT meetings). There are resources available to help you select a platform or evaluate whether the platform you use adequately protects victim information. Please follow this link for more information and tools. For information on VOCA confidentiality and personally identifying information requirements, please refer to pages 18-19 of the VOCA Grantee Handbook . Remember to also consider lower tech options for meetings, such as telephone conferences and encrypted emails.
13.	What are CVSSD’s recommendations for using technology to work remotely and for communicating with survivors?	Several technology resources are available online to grantees who have staff working remotely , offering tele-advocacy and online support groups , hosting meetings and multidisciplinary meetings , etc. CVSSD encourages grantees to research the technology options best suited for their needs and to thoroughly understand the security features of the technology they choose. Protecting privacy and personally identifying information is paramount. So is compliance with national and state privilege

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	<p>and confidentiality requirements. State and national resources on technology safety are available from the National Network to End Domestic Violence, Victim Rights Law Center, and on CVSSD’s COVID-19 Helpful Resources page. Specifically, NNEDV provides a tool for choosing a digital services vendor and VRLC offers guidance for protecting survivor privacy when working from home.</p> <p>When choosing a digital services platform, grantees must weigh the ease of accessibility against the privacy and confidentiality risks associated with using the platform. Survivors must be informed of the potential risks of communicating digitally with advocates prior to or at the start of any communication, including how a platform could compromise privacy or confidentiality. Even in a digital landscape, survivors must be informed when the advocate or agency is required to disclose their information (e.g., mandatory reporting). Survivors must give informed consent about any disclosure of information that the advocate makes on their behalf. These releases of information must be time-limited and specific. Tools are available from NNEDV about how to obtain digital written consent from a survivor.</p> <p>Grantees may consider upgrading technology infrastructure (routers, servers, firewalls, VPN, encryption, remote accessibility). It may be necessary to revise or create new telecommuting policies or policies for use of remote devices. When new digital platforms are implemented, it is important to practice various features before it is used to avoid snafus. Costs associated with technology infrastructure and platform subscriptions are allowed by CVSSD grant funding (see questions #12 and #16). For non-profit organizations, it may be necessary to get approval from the Board of Directors prior to purchasing new technology or making changes to policy. For government-based victim services programs, be sure to consult with information technology staff to better understand technology options available through the city, county or Tribal Nation.</p>
14. Can CVSSD grant funds be used to cover COVID-19 related expenses that were incurred in the last financial reporting period and not otherwise budgeted?	<p>Yes. Grantees may use VOCA, ODSVS, CFA and CAMI MDT funds to pay for expenses after January 1, 2020 that are COVID-19 related and not previously budgeted. COVID-19 related expenses paid by CVSSD grant funds must be reported in the grantee’s quarterly financial report to CVSSD. Documentation of COVID-19 related expenses (invoices, receipts, payroll ledger, general ledger, etc.) must be retained in case CVSSD requests verification of an expense. Also refer to Question #2 and Question #6 of this FAQ document.</p>

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15.	If I have an open VOCA Services, Supplies and Training (SST) grant award, am I still required to keep a minimum level of funds earmarked for category specific activities (i.e. mental health, legal services, emergency services, training)?	No. This specific grant fund requirement is waived. CVSSD is no longer earmarking a minimum level of funds within the four categories of mental health, legal services, emergency services and training. CVSSD now allows grantees to move funds between categories without keeping to a minimum amount. All VOCA SST funds are considered “flexible”.
16.	What procurement guidance is there for programs who are seeking tele-counseling or tele-health services?	CVSSD’s procurement guidance states that a grantee must follow its own procurement policy for procurement transactions using federal award funds. These procedures must be consistent with applicable State, local and tribal laws and regulations. Procurement by micro-purchase is the purchase of supplies or services, the total dollar amount of which does not exceed the federal micro-purchase threshold of \$10,000. Even if a grantee’s procurement policy has a higher threshold than \$10,000, it must still adhere to the \$10,000 threshold for federal award funds. If a survivor self-selects a counseling service, it may be easiest for the counselor or therapist to direct bill the grantee rather than the survivor (as long as the invoice is in the survivor’s name). If a grantee wants to establish tele-counseling services exclusively with one counselor or therapist, then a contract may be necessary. The Crime Victims’ Compensation Program is also available to pay for crime-related services, including counseling expenses from a licensed professional.