

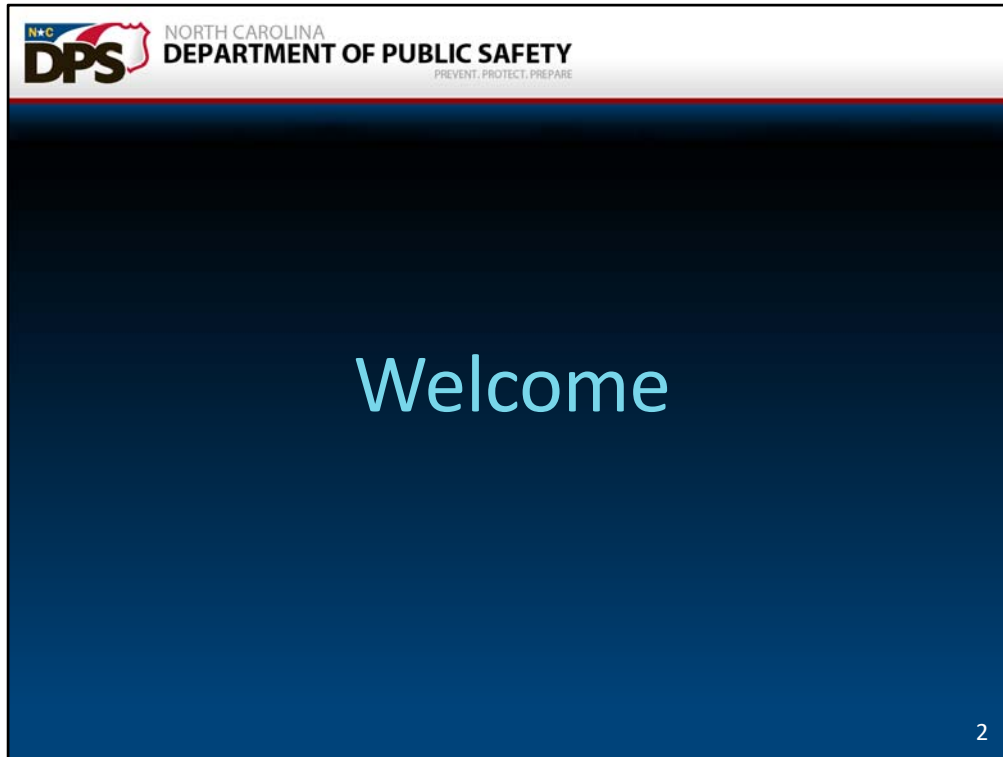


NORTH CAROLINA
DEPARTMENT OF PUBLIC SAFETY
PREVENT. PROTECT. PREPARE

Governor's Crime Commission

COVID-19 Guidance Webinar

April 8, 2020



Good morning and welcome to everyone,
First, We want to thank you all for the services that you are continuing to provide, including your flexibility in communication, adapting to our new normal, and working with GCC and other partners to provide a positive outcome during this dark situation. We understand there are interruptions in your service, staff who are trying their best to find working solutions, report and reimbursement challenges, and other service challenges. This does not even touch on our understanding of your individual and family safety needs including shopping, being a teacher now for your kids, and things that used to be simple like, where do I find Toilet paper? Through this webinar we want you to know that we understand there are struggles that you are facing, and challenges that were not expected when you applied for the grant.

Our intent for this webinar is to explain guidance that we have implemented based on Federal guidance that GCC was provided and to answer as many questions as we can for you. Things are changing often during this time and we will do our best to communicate

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through guidance and webinars the changes that will support you. If you are looking for any of our local guidance letters that have been released for COVID-19 you can find this on the GCC website. Each letter will include the title and date.

Next, I want to take a moment to explain the structure of this webinar session. First, we are going to mute everyone's microphones, so we can ensure that we do not have feedback or distracting noise and everyone can hear. We will allow for questions at the end of the webinar via the chat. The webinar will be broken into two pieces. The first is to explain the released guidance that GCC has provided and the second is to answer questions that you our subrecipients have posed. Some of these questions were received prior to the webinar. If you are posting questions to the chat, I want to caveat, we may not have an answer to all questions, but we will be creating a Q&A with the questions and GCC's responses. As soon as possible we will compile and provide the Q&A back to our subrecipients via our webpage. We will email everyone to let them know the Q&A has been posted. So let me turn it over to Carolyn Locklear and Desrine Yon our Team leads to unpack some of the guidance we have provided through our letters.

GCC Guidance

- GCC Staff are currently working remotely
- We are still processing reimbursements.
- Site visits are on hold
- Conferences/events
- Project extensions
- SAM Registrations



GCC staff are working remotely, but are accessible to you as they have forwarded their messages. Most Grant Managers and Planners have a GCC issued cell phone they can use for communication and we have issued staff technology for teleworking.

GCC is processing reimbursements, and DPS Fiscal staff are processing payments with slight changes to payment dates. To reduce staff at the DPS Controllers Office, the GEMS check write will be set on Tuesday instead of Monday for the first three weeks of April. Checks will go out on the 8th, 15th and 22nd. The daily posting deadlines will not change.

We have been in touch with our VOCA and JJ partners to ask about the possibility of waiving site visits and allowing Desk monitoring to take its place. As soon as we have a response we will let you know the plan through our Grant Managers.

If you have a conference or event that was canceled and you had travel

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issues including hotel, or flights that were canceled we can reimburse for penalties and fines related to COVID-19 with the appropriate documentation. We ask that you first try to recover the full cost or ask for a credit for future travel that can be used for the grant. If this is not possible, your grant manager will work with you to provide the reimbursement.

We can only provide VOCA extensions where the Federal funds are **not** expiring. If you are a VOCA recipient and you feel you need an extension you will need to work with your Grant Manager to determine what year of funds your grant was provided from. We cannot extend those programs whose funds are within funding years that will be ending. The process for requesting an extension has not changed please contact your Grant Manger if you feel this is needed.

OJP has provided a 60-day extension for SAM registrations that were due in March and April. GCC has removed holds on the 62 projects whose SAMS registration expires for the 60-day period.

GCC Guidance

- ▶ Match Waivers
- ▶ Allowability of costs not normally charged
- ▶ Interruptions to service and Salaries and Leave
- ▶ Progress and Performance Measurement Reporting



Match waivers are available for VOCA, VAWA, and JJ programs. To receive a match waiver for extenuating circumstances, GCC subrecipients must submit a written request for the waiver, on agency letterhead, to GCC_Grants_Management@ncdps.gov. Requirements for what must be in the request can be found in the GCC Guidance titled, “Extenuating Circumstances Match Waiver Requests – COVID 19” located on the GCC website. The Match Waiver does not increase the federal share, it waives the requirement for match for the remainder of the project. Match that has already been contributed will remain as a part of your budget. GCC IT will reduce your match in each budget line that includes match required.

Costs not normally charged to the grant that are 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).

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We know you are working to balance health concerns and preventative measures with your local work policies and procedures. We are reimbursing administrative leave, sick leave, annual leave and other benefits where people cannot work due to lack of technology, sickness, caring for someone who is sick consistent with your local policies for these extenuating circumstances. This would apply to employees, temporary staff, and contractors for the grants allocable share. Work with your Grant managers if there are questions regarding leave. Please upload a copy of your leave policy for unexpected or extenuating circumstances to GEMS. Also, for those working that have an issue with Time and Activity forms please talk with your Grant Manager as we will work with you.

OJP has delayed the submission of up to 60 days for progress and performance measure reports due in March and April 2020. GCC has removed the holds from these reports during this extension period. Keep in mind, PMT Reports may use the comments section to explain if there is a dramatic decrease in the service numbers.

Progress and Performance Reporting

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	March 30th	N/A	N/A
VOCA	PMT (Jan-Mar)	April 30	May 15	June 15	July 15



Second Quarter PMT Reports will be due on June 15, 2020 from the subrecipient to GCC.

Question 1

- ▶ What is the projected impact on GCC funding going forward?
- ▶ How does this impact short-term additional funds applied for on 2017 awards that we are waiting to hear about?
- ▶ How will this impact projects currently in the modification phase?



Answer Question 1: Covid 19 does not effect the funding of GCC awards other than the impact on operations.

Question 2 and 3: No impact on funding for awards that have already been made or are in modification phase.

Question 2

- ▶ When will GCC release application & details for Coronavirus Emergency Supplemental Funding?



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Answer: These funds were a part of the Stimulus package. NC received about 14-15 Million and will be administered by GCC Criminal Justice Team. NC will provide the funds mostly to State Agencies. We have submitted our application, are crafting guidance for subrecipients, and will get these funds out as quickly as possible.

Question 3

- ▶ Will Grant report deadlines (Programmatic and Financial) be extended due to the COVID-19 situation?



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ANSWER: Yes, An extensions has been provided for the PMT reporting of the second quarter (January-March data). These reports are now due on June 15, 2020 in OVC and a copy uploaded to Gems.

Period of Performance extensions are available for those grants that do not have expiring funds under the VOCA program and for VAWA, JJ and Byrne Jag as needed. The normal process for requesting an extension from your GM applies.

Question 4

- ▶ Are there any restrictions agencies should be aware of - supplanting considerations etc., if we want to apply for one of the Small Business Loans currently being offered?



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Answer: Federal funds must be used to **supplement** existing State and local funds for program activities and must not supplant (replace) those funds that have been appropriated for the same purpose.

Question 4 Continued

If a subrecipient receives a federally-guaranteed loan under the PPP to cover staff costs instead of its own funding, and later seeks reimbursement for those same costs from the SAA, here are the following considerations on whether this would be a duplication or supplanting issue:

Duplication occurs when the subrecipient uses VOCA Assistance funds to pay for specific costs already covered by other sources. For example:

- If the subrecipient pays a staff position from the PPP loan then draws down VOCA funds to cover the *same* staff position, but never pays the loan back because it was forgiven, the subrecipient may have duplicated costs (or otherwise made an improper payment, see 2 C.F.R. 200.53), unless the forgiven loan funds are allocated to a different cost item. For example:
 - o The PPP loan paid salary for employee 1, but then reallocated to pay salary for employee 2, and then used the VOCA funds to pay for employee 1.
- If the subrecipient pays back the loan, it would *not* be duplication.

Supplanting occurs when a subrecipient intentionally replaces its other state or local victim service funding sources with VOCA funding. For example:

- If a subrecipient uses VOCA funds to replace a PPP loan, then repays that loan instead of keeping the loan funds under the forgiveness provisions, it would *not* be supplanting.
- If a subrecipient uses VOCA funds to replace a PPP loan, then uses those loan funds for another expense (whether the loan is forgiven or not), it typically would *not* be supplanting because PPP funding is not specifically designated for victim service purposes.



Slide was read

Question 5

- ▶ Are "script font" signatures acceptable on time and activity sheets at this time when employees are working remotely and may not have access to printers/scanners etc?



Answer: Yes, Grant Managers have an unlocked Time and Activity form that they can send to you if you need to use electronic signatures. Once the COVID-19 response is over you will have to go back and gain the wet Ink signatures and submit to GCC. Contact your grant manager to receive the form.

Question 6

- ▶ Can we make a grant adjustment and move some our allocated staff / salary funds to supplies (masks etc.) or client costs like hotel for victims that need to be isolated before coming to the shelter or for healthy victims needing space away from an infected shelter?



Answer: Yes, you can do a budget adjustment to move funds to operational needs that are created by COVID-19 work conditions.

Question 7

- ▶ If we work for a company that does not receive any other GCC funds and our company were to close or make cuts, would we still be able to keep our grant or possibly transfer the grant under another GCC recipient agency?



ANSWER: GCC will work with you to find the best resolution, If you are on leave this time can still be reimbursed according to your local policy. If you have an extenuating circumstance policy or are creating one for this need please make sure the approved board policy is uploaded into GEMS.

If a company is closing, GCC will work with the community to find a new provider of services and issue a new grant. Subrecipients cannot transfer their grants.

Question 8

- ▶ In the near future, for retention needs we would like to promote a couple of existing staff - example : Can we do a grant adjustments and add manager to a job title to a Coordinator or Associate Director?



Answer: This is allowable and can be done through a Budget Adjustment. You will have to submit a Job Description outlining the new job duties. Keep in mind that all salaries and leave still need to be allocated through your allocation method for the multiple funding streams that you receive.

Another related way of increasing salary is Hazard Pay. This is also allowable if a part of the local policy. This could be included in extenuating circumstance policies. These Policies must also include all employees, so if you have an existing circumstance policy that includes Hazard pay then employees not funded by GCC Funds will also have access to Hazard Pay.

Question 9

- ▶ Will there be flexibility in budget adjustment deadlines (for example if a grant is ending the 60-day deadline)? Things are very uncertain right now and we foresee having to make changes to line items probably right up to the end of grant periods that are ending on 9/30/20?



Answer: We know there are many challenges and we will try to work with you as much as possible. At present the 60-day deadline still stands. We will adjust this if needed closer to the deadline.

Question 10

- ▶ Can we supply gift cards to clients to purchase food?

(understanding the GCC does not normally allow the purchase of gift cards)



The policy of GCC is to not reimburse for gift cards.

Service providers could explore the use of grubhub and other restaurant delivery services, Instacart, grocery store delivery services etc. In addition, funds could be moved within the grant to provide this as a part of services of the grant.

GCC is exploring the potential of using gift cards for VOCA and VAWA recipients during this COVID 19 response. If this is allowed, a subrecipient must have a gift card policy for monitoring and tracking the gift cards. This would include:

1. Tracking the purpose of the gift card and having a form signed by the client and Project Director agreeing to the purpose and amount.
2. Tracking receipts and invoices and providing a justification of expenses.
3. Outlining internal controls for safe handling of gift cards

Keep in mind without an appropriate receipt a purchase made on a gift card would be unallowable.

Question 11

- ▶ Asking for clarification of “full match waiver” – will the entire match for the entire grant period be waived or only the amount that has not yet been recognized through reimbursement requests?



Answer: No further match will be required for the remainder of the project.

We are still awaiting federal guidance as to how this match waiver will be accounted for. Meaning match payed in will be recorded as an overage. Or your Match needed in our system would be the current amount already contributed.

Chat Questions

- ▶ Jason will read the question for the panel to respond.
- ▶ If we do not have an answer we will add the question to the Q&A that will be posted to the GCC website.

<https://www.ncdps.gov/about-dps/boards-and-commissions/governors-crime-commission>



Next Webinar

▶ April 22, 2020 @ 1:00PM



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We will continue to have a webinar for all subrecipients, as needed, to provide information and continue to answer questions we know you have.

We have received Feedback from many of our service providers and we appreciate the feedback loop allowing us to develop solutions to support you.

Next Webinar will be April 22, 2020



Be Safe!

THANK YOU FOR ATTENDING THE COVID-19
GUIDANCE WEBINAR