

COVID-19 Grantee Frequently Asked Questions

Below are answers to common questions we've received from HRSA grant recipients concerning important COVID-19 grants policies.

COVID-19 has caused staff to unexpectedly work from home. Can grantees use grant funds for general office supplies (ink, postage, paper, etc.), including telecommunication services, and equipment to reimburse staff who are teleworking?

HRSA recommends grant recipients first consult their organizational policies and procedures for suitability to work from home, potential acceptable grant duties while working from home, and processes for reimbursements. Allowable costs awarded under a HRSA grant, would be permissible for reimbursement to an employee approved to work on grant duties at home (due to COVID-19; Ref: 2 CFR § 200.403, 2 CFR § 200.404, 2 CFR § 200.405) in accordance with; the Uniform Administrative Requirements, Federal cost principles, audit requirements for HHS awards (45 CFR Part 75) and consistent with the recipients organizational policies and procedures.

Re-budgeting into an approved budget category up to 25% of the total grant funds are allowable following standard grant policy. Revisions to budgets that exceed 25%; require a Prior Approval request. We anticipate these costs/activities will be short-term, for the duration of the COVID-19 and not a long term situation.

Recipients should not assume additional funds will be available should the charging of the unexpected expenses result in a shortage of funds to carryout approved project activities. Award recipients must maintain appropriate records and cost documentation as required by 2 CFR § 200.302 - Financial management.

My System for Award Management (SAM) registration is expired or about to expire. Is there any flexibility due to COVID-19 so that our organization may still submit an application to a Notice of Funding Opportunity (NOFO)?

OMB Memo [M-20-17](#) allows federal awarding agencies to relax the requirement for active System for Award Management (SAM) registration at time of application in order to expeditiously issue funding. Current registrants in SAM with active registrations expiring before May 16, 2020 will be afforded a one-time extension of 60 days.

In general, applicants must have an active SAM registration in order to apply through [Grants.gov](#); therefore, should you still encounter issues with [SAM.gov](#) registration during the COVID-19 emergency and are unable to submit an application, an additional way for HRSA to provide this administrative relief is to allow applicants that do not have active SAM registrations to request a waiver to submit a paper application. Application waiver requirements associated with paper applications are already found in the HRSA

Application Guide which is referenced in all HRSA NOFOs and directs applicants to contact DGPWaivers@hrsa.gov with their request.

Will HRSA extend the deadlines for our grant competition since many organizations have been impacted by COVID-19 and have not been able to focus on grant applications?

If your organization is unable to submit an application by the published NOFO deadline due to justified circumstances (such as impacts from COVID-19), you may request an extension. As referenced in the [SF-424 Application Guide](#) on pages 14-15 and 48, HRSA's Division of Grants Policy (DGP) in the Office of Federal Assistance Management is the only office authorized to grant extensions. You must contact the DGP via email at DGPWaivers@hrsa.gov and provide a brief explanation and your earliest estimated date of submission.

Your email must include:

- HRSA funding opportunity number;
- name, address, and telephone number of the organization;
- organization's DUNS number;
- and name and telephone number of the Project Director.

Please contact DGP as soon as possible if you anticipate issues completing your application on time and need to request an extension. While HRSA cannot guarantee that every extension request will be approved for the amount of time requested, every effort will be made by HRSA staff to provide administrative relief to applicants impacted by COVID-19. Applicants are also reminded to select "Subscribe" and provide your email address in the [Grants.gov](#) workspace for each NOFO you are reviewing or preparing in order to receive notifications including modifications (e.g., a new application due date), clarifications, and/or re-publication of the NOFO on [Grants.gov](#) before its closing date.

Will COVID-19 impact the amount of time applicants have to reply for Notices of Funding Opportunities (NOFOs) related to emergency response?

As outlined in 45 CFR 75.203, HHS awarding agencies adhere to a standard of providing 60 days for applicants to apply for competitive NOFOs, but may not post NOFOs for less than 30 days without additional approval from HHS.

HRSA consistently publishes NOFOs for 60 days or more to provide applicants with the time needed to submit quality applications.

For NOFOs specifically related to COVID-19 response, [OMB Memo M-20-17](#) provides federal awarding agencies with the option to post NOFOs on Grants.gov for less than 30 days.

While HRSA will make every effort to provide applicants with adequate time to submit quality applications, should additional funding become available for COVID-19 competitive NOFOs, there may be a point where the need to expedite the process requires a NOFO be published for less than 30 days.

Applicants may search for applicable funding opportunities at <https://www.grants.gov/>.

My project period is expiring soon. What can I do if additional time is needed to complete previously approved activities on my grant award?

Per [OMB Memo M-20-17](#) and, to the extent permitted by law, awarding agencies may extend awards, which were active as of March 31, 2020 and scheduled to expire prior or up to December 31, 2020, automatically at no cost for a period of up to 12 months.

This will allow time for recipient assessments, the resumption of many individual projects, and a report on program progress and financial status to agency staff.

Project-specific financial and performance reports will be due 90 days following the end date of the extension. Extension requests can be made through [HRSA's Electronic Handbooks](#). Contact your Grants Management Specialist with any additional questions.

I may not be able to submit my Non-Competitive Continuation progress report on time. Should I request an extension?

HRSA is committed to assisting our recipients during these difficult times. To that extent, if you are unable to submit your non-competitive continuation (NCCs) report by the posted due date, please contact your grants management specialist via email or phone.

Initial contact will be used to determine next steps, which may include, permitting a deadline extension, allowing for a one-time limited non-competitive continuation report, or other determinations as deemed appropriate. Please note, non-competitive continuation reports vary by program so it is important to contact your HRSA grant official for specific guidance. All requests will be handled on a case by case basis, depending on recipient circumstances.

Can we use grant funds to pay salaries for staff on the budget who are not in the office due to closures because of COVID-19?

Yes. Per guidance issued by Office of Management and Budget (OMB) Memo [M-20-11](#) and [M-20-17](#), HRSA recipients may continue to charge salaries and benefits to currently active awards consistent with their organization's policy of paying salaries under

unexpected or extraordinary circumstances from all funding sources, federal and non-federal.

If recipients do not have such policies in place for paying salaries under unexpected or emergency circumstances, they should immediately develop and officially adopt these new policies.

During the COVID-19 emergency, internal controls over time and effort documentation and reporting under 45 CFR 75.430 may be adjusted for staff unable to report for work; however, recipients must document that they are following their organizational policy for charging salaries during unexpected and extraordinary circumstances and they must be able to substantiate federal funds expended in accordance with HRSA guidance (this FAQ) as adopted and permitted by OMB M-20-11 and M-20-17.

Recipients must maintain appropriate records and cost documentation as required by 45 CFR § 75.302 - Financial management and standards for financial management systems and 45 CFR § 75.361 - Retention requirement for records to substantiate the charging of any salaries and other project activities costs related to interruption of operations or services.

Can we charge cancellation fees due to COVID-19 to the grant, such as air tickets, hotels, rental car, conference expenses?

Yes. Per guidance issued by Office of Management and Budget (OMB) Memo [M-20-17](#), HRSA recipients may charge full cost of cancellation when the event, travel, or other activities are conducted under the auspices of the grant. Recipients should not assume that additional funds will be available should the charging of cancellation or other fees result in a shortage of funds to eventually carry out the event or travel.

Recipients must maintain appropriate records and cost documentation as required by 45 CFR § 75.302 - Financial management and standards for financial management systems and 45 CFR § 75.361 - Retention requirement for records to substantiate the charging of any cancellation or other fees related to interruption of operations or services.

What Prior Approval flexibilities are available to HRSA recipients?

Recipients are required to obtain HRSA approval for changes in budget and program plans as stated in 45 CFR § 75.308 and CFR §200.308. HRSA may consider providing flexibilities on a case by case basis for the items cited under these citations.

If the impact of COVID-19 constitutes a change in scope, the recipient must submit a request for prior approval in EHBs. The request must specifically state the change is temporary, as a result of COVID-19, and impacts will not require a subsequent change in

scope, once the public health emergency ends. The project scope will automatically revert to the previously approved scope.

HRSA Recipients should not assume that additional funding will be available should the change of scope result in a shortage of funds to resume or complete the originally approved project when it is safe to resume project activities.

For Health Center Recipients, see specific change in scope flexibilities: [PAL 2014-05: Updated Process for Requesting a Change in Scope to Add Temporary Sites in Response to Emergency Events](#).

Are there any flexibilities for HRSA grant recipients related to HHS procurement requirements?

As required by 45 CFR 75.326, when procuring property and services under a federal award, states must follow the same policies and procedures it uses for procurements from its non-federal funds, including any provisions for emergency situations.

For all other recipients that fall under 45 CFR 75.327 through 75.353, there are two major areas of flexibility:

1. HRSA has adopted the flexibility provided for in [OMB Memo M-20-17](#) to allow recipients to waive the procurement requirements contained in 45 CFR 75.328(b) regarding geographical preferences and 45 CFR 75.330 regarding contracting small and minority businesses, women's business enterprises, and labor surplus area firms. HRSA recipients should document any procurement decisions made in response to COVID-19, and may be asked to provide that information in the future. This flexibility is currently valid during the 90-day period from the [Public Health Emergency Declaration](#).
2. In addition, as provided for 45 CFR 75.329, recipients may solicit proposals from a single source if the item is available only from a single source or the public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation. HRSA recipients should document any procurement decisions made in response to COVID-19, and may be asked to provide that information in the future.

What can my organization do if we need additional time to submit a financial and/or other required reports?

[OMB Memo M-20-17](#) authorizes awarding agencies to allow grantees to delay submission of financial, performance and other reports up to three months beyond the normal due date.

Request an extension through HRSA's Electronic Handbook--[how to request an extension](#). Contact your Grants Management Specialist with questions.

We understand that grantees will continue to draw down federal funds without the timely submission of these reports. However, you must submit these reports at the end of the postponed period.

Who should I contact with Indirect Costs Rate questions?

[Contact Cost Allocation Services.](#)

What can I do if I need additional time to submit required final reports for the purpose of closing my grant award?

[OMB Memo M-20-17](#) allows awarding agencies to permit grantees to delay submission of any pending financial, performance and other reports required by the terms of the award for the closeout of expired projects, provided that proper notice about the reporting delay is given by the grantee to the agency. This delay in submitting closeout reports may not exceed one year after the award expires.

Request an extension through HRSA's Electronic Handbooks - [how to request an extension](#). Contact your Grants Management Specialist with any questions.

Can my organization get an extension to the submission deadline for our upcoming Single Audit Report?

Yes. Per guidance issued by the Office of Management and Budget in Memos M-20-11 and M-20-17, HRSA recipients with awards issued in response to COVID-19 may delay their submission by up to 12 months.

HRSA recipients that do not have awards issued in response to COVID-19, but are affected by the loss of operational capacity due to COVID-19 may delay their submission by a six month extension.

Recipients and subrecipients must maintain documentation of the reason for the delayed filing. Organizations with questions about their ability to obtain extensions should email HRSA's Division of Financial Integrity at SARFollowup@hrsa.gov.

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