



STATE OF INDIANA



Eric J. Holcomb, Governor
Devon McDonald, Executive Director

March 17, 2020

To: All ICJI Subgrantees

From: Devon McDonald, Executive Director 

Re: COVID-19 and Grant Performance Interruptions

ICJI has been working closely with our federal partners to get the most up-to-date guidance on the unique situations that have arisen as a result of COVID-19. As we receive more guidance, we will continue to share it with each of you. The below guidance addresses certain situations as they relate to OJP programs and HHS programs, but does not cover all situations and circumstances that may have arisen in the past few weeks and will continue to arise moving forward.

Office of Justice Programs Funded Grants

Conferences, Events, and Other Gatherings

For conferences, meetings, trainings, and other gatherings that are scheduled in the near future, subgrantees should work to set up meetings as virtual events or postpone or cancel meetings. Conferences, events and other gatherings planned for the distant future will be addressed at a later date.

Subgrantees should contact their grant managers to address issues resulting from postponed or canceled meetings, such as using grant funds to cover hotel or travel related cancellation fees and penalties.

Subgrantees should try to have airlines/hotels/etc. reimburse the canceled ticket(s) in cash. However, if the company will only refund the cancellation as a credit:

- The grantee should apply the credit to a future trip for the same OJP grant or project.
- If that is not possible, the grantee should use the credit for another OJP program or project and reimburse the original OJP grant or project with the equivalent dollar amount.
- If neither of those options is possible, then the grantee should process the trip as a cancellation, which can be charged to the grant due to this mitigating circumstance.

For changes in the budget regarding travel/conferences/etc., subgrantees should submit a PMR to reallocate funds that will not be utilized for these activities.

Salaries/Personnel/Performance of Grant Work

Subgrantees should review their own established policies regarding the payment of salaries in situations with unexpected or extraordinary circumstances to determine how personnel costs may be treated during periods of interruption to the performance of work under the award. Subgrantees should also look to the DOJ Grants Financial Guide and the Part 200 Uniform Requirements (2 C.F.R. Part 200) (see, for example, 2 CFR 200.430 and 2 C.F.R. 200.431). It is recommended that if such policies do not exist, then emergency policies be established to address circumstances such as the current national environment.

Employees who have sick, vacation, personal, or similar leave time accrued may utilize it during this time period in accordance with your organizational policies. Entities are also encouraged to utilize telework or remote working where capable and/or applicable. Costs must be distributed pro-rata share.

Health and Human Services Funded Grants

Salaries/Personnel/Performance of Grant Work

Subgrantees should review their own established policies regarding the payment of salaries in situations with unexpected or extraordinary circumstances to determine how personnel costs may be treated during periods of interruption to the performance of work under the award. Subgrantees should also look to the Part 75 Uniform Requirements (45 C.F.R. Part 75) (see, for example, 45 CFR 75.430 and 45 C.F.R. 75.431). It is recommended that if such policies do not exist, then emergency policies be established to address circumstances such as the current national environment.

Employees who have sick, vacation, personal, or similar leave time accrued may utilize it during this time period in accordance with your organizational policies. Entities are also encouraged to utilize telework or remote working where capable and/or applicable. Costs must be distributed pro-rata share.

Other costs necessary to resume activities supported by the award that are consistent with applicable Federal cost principles and that benefit the project **may** be allowed. We are awaiting additional federal guidance on this topic and request your patience as we continue to receive direction.