

Adolescent Pregnancy Prevention Program Frequently Asked Questions: Flexibilities for Grantees Impacted by COVID-19

On March 30, 2020, the Administration for Children and Families issued “ACF grant flexibilities in conducting human service activities related to or affected by COVID-19,” [IM-ACF-OA-2020-01](#), to interpret Office of Management and Budget guidance.

The Administration for Children and Families (ACF), Family and Youth Services Bureau (FYSB), Adolescent Pregnancy Prevention (APP) Program provides the following short term relief for various administrative, financial management, and audit requirements under 45 CFR Part 75, *Uniform Administrative Requirements, Cost Principles and Audit Requirements for HHS Awards*. Please keep in mind that, in accordance with [M-20-17](#) and [IM-ACF-OA-2020-01](#), these exceptions are time-limited, and the flexibilities afforded to Federal awarding agencies will be reassessed by OMB and ACF within 90 days of the issuance of the OMB memorandum.

Several of FYSB’s APP state, territory, tribal, faith-based, and community-based grantees have submitted questions related to flexibilities in programming, data collection and the use of federal awarded funds in light of the current COVID-19 situation. To address specific programmatic questions and concerns of the APP Program grantees, FYSB has provided responses to the following frequently asked questions (FAQs).

Programmatic and Fiscal Related FAQs

1) Are the APP grantees required to obtain prior approval for allowable costs to address the public health emergency response?

Answer: ACF/FYSB is waiving the requirements for grant recipients to seek prior approval for budget and programmatic changes that are within scope of their grants and are related to the public health emergency. Such prior requests and approval of grant amendments in GrantSolutions are not required during this public health emergency response period. Grantees/recipients can proceed with making budget and programmatic changes, in relation to the public health emergency. As soon as feasible, grantees are required to follow up with their assigned Office of Grants Management (OGM) Specialist and Federal Project Officer (FPO) to seek written approval of those activities.

Grantees/recipients should remain in communication with ACF/FYSB and ACF/OGM, and must continue to act within existing guidelines for use of Federal funds. This temporary flexibility does not make unallowable expenses allowable under a Federal award. ***For those selected items of cost that are not directly related to COVID-19,***

the prior approval requirements remain in effect. Grantees should maintain a copy of this guidance with any other appropriate records and cost documentation in their grant files as required by 45 CFR §75.302 (2 CFR §200.302) (financial management) and 45 CFR §75.361 (2 CFR §200.333) (record retention), to substantiate the charging of any cancellation or other fees related to interruption of operations or services. Where prior approval had been required, grantees should seek approval from, and maintain documentation of approval by, the applicable OGM Specialist and/or FPO.

Reference: 45 CFR §75.407; 2 CFR §200.407.

2) Will FYSB allow costs not normally chargeable to APP Program grant awards?

Answer: FYSB will allow recipients who incur 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, to charge these costs to their award.

Grantees/recipients should not assume 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, travel, and/or other activities. ACF will require grantees/recipients to maintain appropriate records and cost documentation as required by 45 CFR §75.302 (2 CFR §200.302) (financial management) and 45 CFR §75.361 (2 CFR §200.333) (record retention), to substantiate the charging of any cancellation or other fees related to interruption of operations or services due to the public health emergency.

3) Will FYSB allow grantees to pay salaries and other project costs during the COVID-19 crisis?

Answer: ACF/FYSB will allow recipients to continue to charge salaries and benefits to their awards, consistent with the recipients' policy of paying salaries and benefits under unexpected or extraordinary circumstances from all funding sources (Federal and non-Federal). As outlined in 45 CFR § 75.431 (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.

ACF/FYSB encourages recipients to review and update (if necessary) their written leave policies to address "unexpected or extraordinary circumstances." Recipients are required to maintain copies of the leave policies and cost documentation (as required by 45 CFR §75.302 (2 CFR §200.302) (financial management) and 45 CFR §75.361 (2 CFR §200.333) (record retention), to substantiate the charging of salaries and benefits during an interruption of operations or services. Grantees are

prohibited from charging salaries and benefits to their federal grant and retaining those funds without making payment to staff.

Further, ACF does not allow grantees to use federal grant funds from one federal grant to pay for staff working on another federal grant. For example, grantees may not use SRAE funds to pay employees working on a PREP grant. The Uniform Administrative Regulations provide that, “Any cost allocable to a particular Federal award under the principles provided for in this part may not be charged to other Federal awards to overcome fund deficiencies, to avoid restrictions imposed by Federal statutes, regulations, or terms and conditions of the Federal awards, or for other reasons.” 45 CFR 75.405(c).

Reference: 45 CFR Part 75 Subpart E – Cost Principles, including 45 CFR §§ 75.403, 75.404, 75.405; 2 CFR Part 200 Subpart E – Cost Principles, including 2 CFR §§ 200.403, 200.404, 200.405.

4) Will grantees receive an extension on the submission of financial and performance progress reports?

Answer: Yes. ACF/FYSB is allowing an extension of the due date for up to three (3) months beyond the normal due date for Federal Financial Reports. However, these reports must be submitted at the end of the postponed period.

SF-425 Federal Financial Reports—Due Quarterly		
Reporting Period	Original Due By Date	Due Date Extended
January 1–March 31	April 30	July 30
April 1–June 30	July 30	To be determined
July 1–September 30	October 30	To be determined

For grantees unable to meet original due dates, ACF/FYSB will allow grantees to delay submission up to three (3) months for performance progress reports. However, these reports must be submitted at the end of the postponed period. The reports for competitive grants are to be submitted as a Grant Note and for state/formula grants through the OnLine Data Collection (OLDC) portal in the GrantSolutions system.

Performance Progress Report—Due Semi-Annually		
Reporting Period	Original Due By Date	Due Date Extended
September 30, 2019 - March 31, 2020	April 30, 2020	July 30, 2020
April 1, 2020 - September 29, 2020	October 31, 2020	To be determined

Grantees/recipients must notify ACF/FYSB of problems, delays or adverse conditions, including those related to COVID-19 as required by 45 CFR 75.342(d)(1) and 2 CFR §200.328(d)(l).

Reference: 45 CFR §§75.341, 75.342, 75.343; 2 CFR §§200.327, 200.328, 200.329.

5) Will site-monitoring visits scheduled to take place over the next few months be postponed or cancelled?

Answer: Until otherwise notified, scheduled on-site monitoring visits will be conducted as remote monitoring visits or may be postponed. On-site monitoring visits will resume in the future, when deemed safe. If your organization is unable to participate in remote monitoring due to operational limitations, your monitoring visit will be postponed.

6) When will grantees receive updates on the status of FYSB/APP Program - sponsored conferences, events, and other gatherings:

Answer: FYSB will provide updates on the status of planned, in-person events in the near future via e-blasts and email notification by FPOs. The 2020 APP Grantee Conference will not be hosted in-person in Atlanta, GA. Information regarding alternate plans is forthcoming.

7) Will ACF/FYSB publish Funding Opportunity Announcements (FOAs) in 2020?

Answer: Yes. FYSB/APP Program announcements for Title V Competitive Sexual Risk Avoidance Education (SRAE) will be posted in the near future on [Grants.gov](https://www.grants.gov). The Title V State SRAE and general departmental funded SRAE program FOAs have been published and the link to the announcements are below.

Sexual Risk Avoidance Education Program Funding Opportunity Announcement
[HHS-2020-ACF-ACYF-SR-1849](#)

Application Due Date: May 26, 2020 at 11:59 p.m.

Title V State Sexual Risk Avoidance Education Program Funding Opportunity Announcement
[HHS-2020-ACF-ACYF-SRAE-1848](#)

Application Due Date: May 29, 2020 at 11:59 p.m.

8) If our organization received state or local guidance to cancel programming and are unable to serve any youth/families for a period of time, how will this break in services impact our funding status? Can grant goals and objectives be adjusted accordingly?

Answer: Yes. Grantees who are unable to provide direct services, due to the public health emergency that required the closure of schools and/or community based programming, may opt to submit a plan to their assigned FPO to conduct virtual educational sessions. Grantees will not be penalized for the adaptation or suspension of programming during the COVID-19 health emergency period.

Due to school closures, the schedule of program activities will be assessed periodically throughout the COVID-19 mitigation period and when programs return to normal operations. Grantees can request a referral for technical assistance through their assigned FPO. Technical assistance is available on topics such as virtual programming, program implementation planning, adaptations and program adjustments, and staff development on addressing crisis and trauma, among others.

The grant goals and objectives may be adjusted. Grantees are to send an email to their assigned FPO that reflect modified goals and objectives that comply with the legislative authorization for the APP Program and the related funding opportunity announcement.

9) Has FYSB provided guidance for moving forward with programming, engaging with partners, and connecting with participants during this time as it relates to the coronavirus?

Answer: FYSB's guidance on programming moving forward is for grantees to continue to follow the health and safety guidance of CDC, state and local public health departments, and other local authorities regarding social distancing. Grantees are encouraged to request a referral for technical assistance through their assigned FPO. Technical assistance is available on topics such as virtual programming, program implementation planning, adaptations and program adjustments, and staff development on addressing crisis and trauma, etc.

10) Will funding still be available to grantees if COVID-19 has led to office closures?

Answer: Yes. Please see the answers to Questions 2 and 3, above.

11) Is there a maximum timeframe in which programs can remain closed, but still receive funding (i.e., if a grantee closes for 3 weeks as opposed to another grantee closing for 3 months)?

Answer: No. There is no specific timeframe in which programs can remain closed and continue to receive grant funding during the awarded project period. As additional guidance becomes available, grantees will be updated.

12) Will budget revisions be allowed to incorporate equipment necessary for virtual services to be provided?

Answer: Yes. Budget revisions will be allowed for costs not normally chargeable to awards pursuant to Information Memorandum IM-ACF-OA-2020-01, shared with grantees on March 30, 2020. See item 6 of the memorandum and the answers to Questions 2 and 3, above.

13) Will there be a webinar, cluster call or Ted talk in which grantees can exchange ideas with other grantees on how to be innovative with the provision of services?

Answer: The APP Program plans to have their training and technical assistance (TA) providers schedule TA and cluster calls in the coming weeks. Grantees will receive notification of such sessions through e-blasts from the SRAE and PREP training and technical assistance contractors.

14) Will the project period be extended to accommodate for the time lost?

Answer: ACF guidance will be provided at a later date on potential options to extend grant projects.

Performance Measures and Evaluation FAQs

15) We were unable to meet the March 31, 2020 deadline for submitting PREP performance measures data. Will we have another chance to enter that data?

Answer: Yes. FYSB is extending the deadline to submit PREP performance measures to April 30, 2020. If you have any concerns about meeting this deadline, please contact your FPO.

16) Will the summer data entry period for the SRAE and PREP structure, cost, support and attendance, reach, and dosage data be postponed?

Answer: At this time, FYSB has not postponed data entry submission for SRAE or PREP structure, cost, support and attendance, reach, and dosage performance measures. FYSB will host webinars in May to train grantees and sub recipients on the data submission process. Grantees that anticipate any issues with submitting these data on time should contact their FPO. At present, the due date to submit data is June 2020. If there is a change, all grantees will be promptly notified.

17) Do I still have to report PREP and SRAE attendance, reach, and dosage data for cohorts that were not completed due to school closures?

Answer: Yes. FYSB expects grantees to report on attendance, reach, and dosage data this June as scheduled for the period of performance. FYSB expects grantees to collect performance measures data as their circumstances allow. Please notify your FPO if you will not be able to collect or report on these measures.

18) Are grantees expected to continue to collect performance measures exit surveys from cohorts that were not completed due to school closures?

Answer: FYSB expects grantees to collect performance measures data as their circumstances allow. We do not expect all grantees to collect exit surveys due to unanticipated school and other implementation setting closures that impacted the completion of programming.

For grantees continuing to provide programming using virtual platforms, they are encouraged to use electronic or other mediums to collect the data. Please notify your FPO if you will not be able to collect or report on these measures.

19) We can no longer meet with partners and stakeholders to get approval for the new SRAE and PREP performance measures entry and exit surveys. Do we still have to start collecting the new SRAE and PREP entry and exit surveys on July 1, 2020?

Answer: FYSB has postponed the July 1, 2020 data collection start date for the SRAE and PREP participant entry and exit surveys. Additional guidance and information on the new start date are forthcoming.

20) What do we need to build capacity to collect performance measures surveys online?

Answer: Grantees who are switching to an online platform can request technical assistance through their FPO to learn about methods and strategies to build their capacity.

21) Several PREIS grantees were not able to complete the final cohorts that were needed for the impact evaluation. Will PREIS grantees be allowed to request no-cost extensions to the grant to allow time to make up for these cohorts?

Answer: Yes. FYSB will allow PREIS grantees to pursue no-cost extensions to extend their grant period. The timeframe for no-cost extensions will vary on a case-by-case basis and must not exceed 12 months beyond the grant project period.