CORONAVIRUS (COVID-19) FREQUENTLY ASKED QUESTIONS
Research and Evaluation Specific Questions
Last update 4/2/20

CNCS is closely monitoring the latest developments related to COVID-19. As Americans prepare for the possibility of a COVID-19 outbreak in their community, you may have concerns about the potential impact of this new virus on your program. To help address these concerns, we are providing you with these FAQs. They will be updated regularly.

These FAQs do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies. You should refer to CNCS’s statute and regulations for applicable requirements.

Information for Research Grantees:

1. As a CNCS research grantee, what do I do if my work plan changes due to cancelations at the university and community events?
   If you are a 2015 or 2017 National Service and Civic Engagement Research Grantee or a 2018 Community Conversations Research Grantee and your work plans will be affected due to public health concerns associated with COVID-19, please contact your CNCS Program Officer by email with specific information regarding your situation and anticipated impacts. [updated 3/13]

2. As a 2017 National Service and Civic Engagement Research Grantee completing the third year of a grant, can we apply for a no-cost extension if my work plan changes due to cancelations at the university and at other organizations associated with my research?
   Consistent with OMB’s Memorandum “Administrative Relief for Recipients and Applicants of Federal Financial Assistance Directly Impacted by the Novel Coronavirus (COVID-19) due to Loss of Operations,” issued March 19, 2020, if you are a 2017 National Service and Civic Engagement Research third-year grantee you are able to request up to a one-year, no cost extension. Please contact your CNCS Program Officer by email with specific information regarding your situation and anticipated impacts. [updated 3/24]

Information for Social Innovation Fund (SIF) Grantees:

1. As a CNCS Social Innovation Fund 2015 or 2016 grantee, what do I do as the Program Lead if implementation of my awarded application, subgrantee work plan, or approved evaluation study design and communication plan is impacted due to COVID-19 public health concerns?
   If you are a 2015 or 2016 Social Innovation Fund grantee and your funded and approved application work plans will be affected due to public health concerns associated with COVID-19, please contact your CNCS Program Officer by email with specific information regarding your situation and anticipated impacts. [updated 3/13]
2. We are sharing our expectations with our SIF subgrantees, specifically related to time reporting. In terms of verification of the time and activities performed, we’re looking at options to validate claimed hours when subgrantees are unable to complete normal business practices. It is our understanding that our subgrantee staff are working remotely, however some of their existing grants management processes are a bit ill-suited for teleworking. For those that may not have an electronic timekeeping system or typically use hard copy timesheets, would an email from a staff person to their supervisor, noting the dates and time spent on SIF activities – with a subsequent email from the supervisor “approving” be sufficient documentation?

Uniform Guidance 2 CFR 200.430(i) does not require time sheets, just the recording of time for a specific employee with percentage breakdown on all activities, both Federally funded and non-Federally funded, and the assurance that it is accurate, allowable, and properly allocated. This allows for you and your subawards to have some flexibility on how exactly how you will document timekeeping and chargeable activity information.

Grantees and subgrantees should follow their internal policies for timekeeping and verifying timesheets when an employee is not available to sign their timesheet. If a policy is not in place, there are alternative ways to create those records. Employees who are teleworking may submit alternative written submissions to their supervisor noting hours they have served. Rather than using a timesheet, their submissions may be sent, for example, via email. The supervisor may, in turn, approve each submission by sending a response back to the employee with a notation such as “Hours submitted approved”. In addition to the emailed information and approvals themselves, both you as the Grantee and the subawards should document the temporary change in timekeeping practices in an internal memo kept for their records and yours.

Uniform Guidance:
2 CFR 200.430(i) requires non-Federal entities to maintain records that “accurately reflect the work performed.” These records must:

- Be supported by a system of internal control which provides reasonable assurance that the time being charged is accurate, allowable, and properly allocated
- Are incorporated in the official records, such as payroll records
- Reasonably reflect the employee’s total activity
- Provide a time or percentage breakdown on all activities, both Federally funded and non-Federally funded, for the employee
- Comply with the non-Federal entity’s pre-established accounting practices and procedures
- As stated at 2 CFR 200.430(i)(8), non-Federal entities that cannot meet the aforementioned conditions may be required to submit personnel activity reports.

[updated 3/20]

3. If our SIF Award were to ask for a no-cost extension due to COVID-19, is there any indication that our deadline to draw down federal funds and report by our closeout date would be extended?

This question has two parts. OMB’s Memorandum “Administrative Relief for Recipients and Applicants of Federal Financial Assistance Directly Impacted by the Novel Coronavirus (COVID-19) due to Loss of Operations” (titled M-20-17), issued March 19, 2020, allows for some latitude in what federal agencies can offer to their active awards impacted by COVID-19, to include a no-cost extension. Funds were obligated within their period of availability and are available to liquidate obligations for a period of five years after the date of expiration. See 31 U.S.C. § 1552(a). M-20-17 did not change this. Thus, grantees can draw down on the funds for five years, at which point the account will close and the funds will be cancelled. SIF cohort 2015 and 2016 grantees were not given continuation funding, and therefore are operating on only one five-year funding strip. For a SIF grantee this means that funds that are not spent and drawn down by the conclusion of this five year period will be automatically recovered by the U.S. Treasury and that you and your team will be unable to draw them down from the Payment Management System (PMS). A no-cost extension would not change this. [updated 4/2]

4. Our SIF award is in the final program year, and we are beginning to closeout our subgrantees. Could we extend our SIF subawards to continue serving the participants and draw on federal funds (if matching funds are available)?

Per 2 CFR 200.308, if your subawards have not closed out yet, you can extend your remaining SIF subgrantee agreements, as long as your own internal SIF policies and guidance supports granting a no-cost extension. However, you cannot
extend them past the current period of performance end date of your federal award. You need to inform your PO of the extension in writing, but it does not require the PO’s approval. [updated 4/2]