

# ETA Coronavirus (COVID-19) FAQs

*The Employment and Training Administration (ETA) has developed a Frequently Answered Questions (FAQs) to address questions related to Coronavirus (COVID-19) to help state and local workforce leaders, and other stakeholders and partners to assist the public workforce system during this crisis.*

## ALL GRANTS

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*Updated as of May 1, 2020*

**Q. Are the costs of a grantee's leave policy that provides paid leave to employees (including part-time employees and employees of subrecipients) when their work hours have been reduced due to COVID-19 closures or disruptions (e.g., if a grantee's offices are shut down due to COVID-19) allowable costs of the Federal grant?**

**Response:** Yes. 2 CFR 200.431(b) states that a leave policy is allowable if it is an established, written policy that applies equitably and consistently to all staff regardless of employee class, and if it is reasonable. However, a State may only charge an employee's paid-time-off to the Federal grant if it is the State's overarching policy to pay all employees in this situation, regardless of the funding source used to cover such an expense. If a grantee amends its existing leave policy or develops a new emergency leave policy applicable to all employees affected by the COVID-19 pandemic, costs incurred under that policy would be allowable provided they meet the requirements in 2 CFR 200.431(b). For any change in policy that impacts the budget, competitive or discretionary grantees may need to submit a budget realignment request. If the change in policy impacts an approved indirect cost rate or cost allocation plan, the grantee must request a change or obtain an extension from its federal cost negotiator. Grant recipients and subrecipients must maintain appropriate records and cost documentation as required by 2 CFR § 200.302 - Financial management and 2 CFR § 200.333 - Retention requirement of records to substantiate the charging of any salaries and other project activities costs related to interruption of operations or services. Salary and Bonus limitations (Pursuant to P.L. 115-141, Division H, Title I, Section 105) remain in effect. At this time, no additional funds will be provided by ETA to cover these expenses. Should the need for such leave be longer than 60 days, ETA will provide additional guidance on these paid leave policies.

**Q. Can WIOA formula and competitive grants continue to pay wages or stipends if program participants were actively being served prior to the pandemic or if they were in a work experience placement (e.g. subsidized employment, OJT, paid internship) which has been recently cancelled due to COVID-19?**

**Response:** If the program participant's time commitment, stipend structure, and/or other academic or work terms were established prior to the national health emergency declaration, grantees should continue to pay the participant for the remainder of the established term.

**Q. Can states or grantees waive procurement requirements?**

**Response:** In accordance with [OMB Memorandum M-20-17](#), grantees may conduct procurements under the public emergency provision ([2 CFR 200.320\(f\)\(2\)](#)). Grantees can waive the procurement requirements contained in [2 CFR 200.319\(b\)](#) regarding geographical preferences and [2 CFR 200.321](#) regarding contracting with small and minority businesses, women's business enterprises, and labor surplus area firms. Grant recipients are expected to use sound fiscal prudence to maximize value for each taxpayer dollar spent. These exceptions are time limited and will be reassessed by ETA within 90 days of the OMB Memo M-20-17 dated March 19, 2020, that is, by mid-June.

**Q. Can grantees use funds to purchase cleaning supplies?**

**Response:** Yes, to the extent that the supplies are used for the benefit of the grant program (e.g., in grantee spaces, or a proportionate share of shared spaces).

**Q. Is it an allowable charge to a grant if an employee works on COVID-19 related functions (i.e. sanitizing the building, etc.) and not grant-related functions?**

**Response:** Assisting in the cleaning and sanitizing of dedicated and common space that is used to house and serve program staff and participants is an allowable grant function.

**(New as of 4/14/20) Q. Can grant programs purchase food to participants seeking assistance?**

**Response:** Generally, grant funds from the Employment and Training Administration cannot be used to provide food assistance to individuals in the grantee's community. On a limited basis and in certain situations, food at a reasonable cost may be provided to youth-serving program participants as a supportive service. Food may be provided to eligible youth when it will assist or enable the participant to participate in allowable youth program activities funded through one or more of our programs and to reach his/her employment and training goals, thereby achieving the program's overall performance goals. The focus of the programs is to train youth, and the use of grant funds for food should be limited to reasonable and necessary purchases that are coordinated with other community, state, or federal services that provide food for low-income individuals.

**Q. Should states or local areas suspend all youth and adult work experience during this crisis, or determine the best course of action depending on the youth/adult and employer situations?**

**Response:** States and local areas should follow CDC and state and local government guidance in making determinations related to whether youth and adults should still be participating on work experiences, and should consider the environment in which the work is being conducted, and the chance for virus transmission. ETA understands that many activities including work experience may be suspended or impacted.

**Q. Can grantees shift to virtual services, such as e-learning, phone calls, and virtual meetings?**

**Response:** ETA programs provide flexibility to grantees in how they provide services. Grantees can choose the best method of continuing to deliver program services. Security of customer data and its transition as well as ease of customer access must be considered.

**(New as of 4/14/20) Q. Can grantees purchase laptops and tablets for participants so they can continue their education and training from home. Are laptops and tablets equipment? Do grantees need prior approval from the grant officer to purchase these?**

**Response:** Yes, grant funds can be used to purchase supplies or equipment to assist in providing program services and training in a virtual setting during this time. The definition of equipment is found at 2 CFR 200.33. The definition of supplies is found at 2 CFR 200.94. Laptops and tablets usually fall within the definition of supplies, which do not need grant officer approval. The Uniform Guidance at 2 CFR 200.302 and § 200.303 requires that all funds, property, and other assets be safeguarded against loss from unauthorized use or disposition. The grant recipient and its service providers must have sufficient internal controls and policies in place to account for all assets. Grant recipients should use safety precautions to protect personally identifiable information and use sound fiscal prudence to maximize the value of taxpayer dollars spent. Grantees should weigh the length of time remaining in the period of performance against the reasonable benefit to the program for purchases of new supplies or equipment.

**Q. Is there flexibility to offer academic courses and/or training in a distance learning platform?**

**Response:** ETA programs provide flexibility to grantees in how they provide services. Grantees can choose the best method of continuing to deliver program services. The security of customer data and its transmission, as well as ease of customer access, must be considered.

**Q. Can grant recipients continue to manage fiscal monitoring of sub-recipients remotely?**

**Response:** Monitoring and oversight can take many forms and may include remote or desk monitoring. The transmission of PII data may be done through encrypted email or cloud services, with the appropriate protections to prevent inappropriate disclosure.

**(New as of 5/1/2020) Q. If services are disrupted for a few weeks, will grantees be able to extend the period of performance so we can complete all planned grant activities?**

- **Response:** For competitive discretionary grants, ETA understands some grant functions might need to be suspended for health and safety reasons. ETA will consider period of performance extensions. Please contact your Federal Project Officer to request such an extension if your grant ends within the next quarter. Include details about how and why COVID-19 disruptions impact the ability of the grant to finish timely. Otherwise, grantees may wait until they resume normal operations to submit period of the performance extension requests.