NOAA Guidance: NOAA Guidance Regarding Administrative Relief for Recipients and Applicants of Federal Financial Assistance Directly Impacted by the Novel Coronavirus (COVID-19) Due to Loss of Operations

CRCP Frequently Asked Questions

1. Allowability of Salaries and other Project Activities

- Will federally funded staff be able to continue charging the award and receiving paychecks when they are unable to work due to closures or lack of allocable work available (i.e. field work, in-person activities, etc.)?
 - Yes, if it is consistent with the recipients' existing policy of paying salaries under unexpected or extraordinary circumstances.
- Will recipient funded staff still be able to count salary as match when they are unable to work due to closures or lack of allocable work available (i.e. field work, in-person activities, etc.)?
 - Yes, if it is consistent with the recipients' existing policy of paying salaries under unexpected or extraordinary circumstances.

2. No-cost Extensions on Expiring Awards

- Will NOAA extend awards which have already been granted an extension?
 - CRCP will consider recommending an additional extension to an award on a case-by-case basis. It's important that any requests be a result of interruptions, challenges, impacts, and related adjustments due to the COVID-19 situation, and not an opportunity to begin new work or make other non-COVID-19 related changes. Extension requests should include a short justification explaining the impacts of COVID-19 on award tasks. While NOAA's guidelines allow for an extension of up to 12 months, we encourage programs to close out awards as soon as possible after the COVID-impacted projects have been completed. Please contact your Management Liaison or Federal Program Officer before submitting a No Cost Extension request in Grants Online.

3. Extension of Financial, Performance, and Other Reporting

- Does the three-month delay in reporting submissions include final reports?
 - We recommend submitting an extension to closeout via the Grants Online system. If you do not have access to Grants Online, please contact your liaison.
 If you don't submit the extension to the closeout request, the Grants Online system and the ASAP system will lock and you will lose access to remaining funds.
- Will there be any adverse actions taken by NOAA for delinquent reports?
 - No. Delinquent report notices are automatically generated by Grants Online but should be ignored. No adverse actions will be taken by NOAA, and the reason for

delinquency should be noted in the comments when the reports are submitted, to document the file.

4. Extension of Single Audit Submission

- Does the recipient need to notify NOAA that they intend to take advantage of this sixmonth extension?
 - No, however NOAA may ask about any Single Audit delinquencies during due diligence review of new and continuing funding actions. The due diligence reviews are standard procedure, so programs should simply cite this extension at the time of those reviews.

5. Allowability of Costs not Normally Chargeable to Awards

- What "other activities" would be considered allowable that would not normally be chargeable to awards?
 - Although NOAA does not require prior approval to be submitted to authorize costs under this section, CRCP recommends that any activities or costs other than those directly related to a cancelled event or travel that the recipient is considering charging be forwarded to the liaison for concurrence.

6. Flexibility with Application Deadlines

- Is CRCP extending application deadlines?
 - CRCP does not currently have any open application deadlines and will not reopen closed competitions for FY20.

7. Non-federal Matching Funds

- The guidance from OMB and NOAA does not address a waiver of non-federal matching funds. What is NOAA's flexibility to reduce or eliminate required matching funds when the recipient can no longer meet the requirements?
 - CRCP does not have the authority to waive match requirements for obligated funds. CRCP may be able to waive match for future obligations on a case-bycase basis with proper justification. Please contact your Management Liaison or Federal Program Officer immediately if your approved match is at risk.
 - Match must be expended at a rate proportional to the federal funding.
 Department of Commerce Financial Assistance Standard Terms and Conditions,
 B.03.b. may allow a waiver of the expenditure rate, but the recipient is still responsible for all of the cost share by the end of the award.
 - If you anticipate that your state will not be able to come up with adequate non-federal funds for your FY20 award, please let us know so that we can work with you. CRCP stands ready to work with partners in order to identify alternative allowable match sources, where necessary.
 - Ultimately, if the federal funds are expended and the match cannot be met, federal funds will need to be returned proportional to the shortage at the time the award is closed.