

**U.S. Department of Education  
Office of Postsecondary Education  
Higher Education Programs**

**FREQUENTLY ASKED QUESTIONS AND ANSWERS  
For Non-CARES Act Competitive Grant Programs Administered by the  
Office of Postsecondary Education  
In Response to COVID-19**

This fact sheet responds to frequently asked questions received from grantees for competitive grant programs authorized by the Higher Education Act of 1965, as amended, and administered by the U.S. Department of Education (ED), Office of Postsecondary Education (OPE), during the novel Coronavirus Disease 2019 (COVID-19) national emergency. This fact sheet is applicable to grants made under the Department's regular postsecondary grant programs and is not applicable to grants received under the CARES Act. For more information about CARES Act programs and grants, please go to: <https://www.ed.gov/coronavirus>. If you have additional questions or comments related to these questions and answers, please contact your Department program specialist or send your questions to the following email address: [COVID-19@ed.gov](mailto:COVID-19@ed.gov).

**GUIDANCE THAT APPLIES TO ALL OPE GRANT PROGRAMS**

**Salaries**

1. Is the payment of salaries using project funds allowable even if project staff are unable to work from home due to the nature of approved activities? Does the same apply for part time staff, i.e., counselors, tutors, instructors, etc.?

Yes. Generally, a grantee or subgrantee may continue to charge to their grant the compensation (including but not necessarily limited to salaries, wages, and fringe benefits) of its employees assigned to work on the grant project, consistent with the organization's policies and procedures for paying compensation from all funding sources, Federal and non-Federal, under unexpected or extraordinary circumstances, such as a public health emergency like COVID-19.<sup>[1]</sup> Thus, if the organization pays, consistent with its policies and procedures, similarly situated employees whose compensation is paid with non-Federal funds during an extended closure, those paid with grant funds from

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<sup>[1]</sup> See Office of Management and Budget (OMB) Memorandum M-20-17, <https://www.whitehouse.gov/wp-content/uploads/2020/03/M-20-17.pdf>. Please note that the flexibilities provided under OMB Memorandum M-20-17 are time limited and are available only until June 17, 2020. The Department will reassess and provide further guidance as necessary at that point of time.

the Department may also continue to be paid.<sup>[2]</sup> However, an employee who is being paid with Department grant funds may not be compensated for activities that are not part of the grant project using grant funds. Additionally, an employee who is being paid with Department grant funds while the program grant activities are closed in whole or in part due to the COVID-19 pandemic may not also be paid for the time during which the program is closed by the organization or another organization for working on other activities that are not closed down.

If a grantee or subgrantee does not currently have in place a policy that addresses extraordinary circumstances such as those caused by COVID-19, the grantee or subgrantee may amend or create a policy in order to put emergency contingencies in place for Federal and non-Federal similarly situated employees. If the conditions exist for charges to be made to the Federal grant, we expect charges to also be made to any non-Federal sources that are used by a grantee or subgrantee in order to meet a matching requirement.

A grantee and subgrantee must maintain appropriate records and cost documentation as required by [2 CFR § 200.302](#) (financial management), [2 CFR § 200.430\(i\)](#) (standards for documenting personnel expenses), and [2 CFR § 200.333](#) (retention requirements for records) to substantiate the charging of any compensation costs related to interruption of operations or services.

At the same time, recipients should consider ways that employees paid with grant funds can support continuing activities, including distance learning opportunities for students served by the grant.

2. If the institution is paying student workers or is paying graduate student stipends or fellowships using grant funds, should the institution continue to pay those individuals if they are unable to continue performing their work related to the grant during the COVID-19 disruption?

Yes, grantees may continue to pay student workers or provide graduate student stipends or fellowships using grant funds, even if their work is disrupted due to COVID-19, if the pay is authorized by a binding commitment. We strongly encourage institutions to continue the activities as much as possible under the grant using remote or distance learning and the telephone as well as other communications technologies. However, we understand that some students may be unable to continue performing their work during the disruption if, for example, the facility where they normally conduct scientific research is temporarily closed, and they no longer have access to essential equipment.

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<sup>[2]</sup> *Uniform Administrative Requirements, Cost Principles, And Audit Requirements For Federal Awards* (Uniform Guidance) 2 CFR §§ 200.403(c) (allowability of costs), 200.404 (reasonable costs), 200.405 (allocable costs), 200.430(b) (compensation for personal services), and 200.431(a)-(b) (fringe benefits).

Communication through mail or conference calls or the other means discussed above, can serve as acceptable continued activity while off site.

Grantees 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 the grant even during interruption of operations or services. The grantee should also document its efforts to have the student workers or graduate students use other means to conduct the work and why it did not succeed if applicable.

The Department has also issued other guidance on the payment of Federal Work Study wages during the national emergency. This guidance can be found on the Department's COVID-19 website as well as in the Information for Financial Aid Professionals portal: <https://www.ed.gov/coronavirus>.

**3. What type of documentation is required to account for time and attendance?**

A grantee and subgrantee must maintain appropriate records and cost documentation as required by [2 CFR § 200.302](#) (financial management), [2 CFR § 200.430\(i\)](#) (standards for documenting personnel expenses), and [2 CFR § 200.333](#) (record retention requirements) to substantiate the charging of any compensation costs related to interruption of operations or services. Projects should log time that staff is working off-site, for example through email communication, conference call logs, records of communication with students, electronic time and attendance, keeping careful notes, or time logs, and a combination of all or some of these methods as appropriate.

**Electronic Signature**

**4. Are electronic signatures for documentation of expenditures permissible?**

During the COVID-19 pandemic, electronic signatures for documentation of expenditures is allowable. That is, it is acceptable to sign, scan, and email as a PDF documents in which the Department would normally require a “wet signature.” As soon as the national emergency ends and it is feasible to get “wet signatures,” that approach should be used or resumed.

**Provision of Services**

**5. Are virtual activities allowable given the closure of institutions/organizations and target schools served by the project? If so, how do we track participation? What happens if a project is unable to provide services virtually?**

The Department strongly encourages projects to consider innovative ways in which to continue to provide services, to the extent possible and consistent with the allowable uses of funds under the specific grant program. If projects can conduct virtual activities, similar to those that would normally be provided, please do so. Consistent with your program's requirements for tracking in-person participation and attendance, projects must develop appropriate methods for tracking remote participation, such as having participants send an e-mail or text message that they were in attendance or using other methods that the institution employs to verify participation of students enrolled in ~~distance~~ learning activities.

Yes, in many cases it is permissible. Funds may be reallocated from line items of the approved budget to cover the cost of electronic devices if allowable under the program statute and regulations, but grantees must first notify their program specialist to explain the reallocation and provide supporting documentation for any changes to the approved budget.

Grantees administering non-CARES Act grant programs may provide computers or other technology to students to enable them to continue learning during this period if allowable under the program and needed to accomplish the grant project's objectives. Because many students served by OPE's regular grant programs, particularly the GEAR UP and TRIO programs, are under the age of 18, we are not permitting grantees to provide cash awards to students unless doing so was an approved activity under your grant prior to COVID-19. Any changes to uses of funds must be reported to your program specialist and included in your Annual Performance Report (APR).

8. What options does a grantee have if it originally proposed to operate a summer program (residential or non-residential), but as a result of COVID-19, is now unable to do so?

The Department encourages grantees to consider substituting virtual summer programs that meet the goals of the original grant program and enable s hrab enaThe Tw 7.335 31enspartirRasmiB

- iii. In identifying a revised expiration date, the grantee must identify the actual time (months) needed to complete the work.

**Non-Competing Continuation Award (NCC)**

- 10.** Will the Department issue non-competing continuation awards (NCC awards) to grantees whose project activities were interrupted by COVID-19 campus closures or other disruptions of instruction?

The Department anticipates making NCC awards, including for grants that would otherwise expire, for budget period 2020-2021. In order to award an NCC award, program staff will review data from a grantee’s annual performance report (APR), which understandably may reflect necessary program interruptions, and the program staff may request additional follow-up information. This follow-up information may include a brief statement from the grantee and any partner institutions/organizations confirming that the grantee is in a position to: (a) resume or restore its project activities once COVID-19 interruptions are resolved; and (b) accept a planned continuation award. As we continue to monitor the situation, we will inform you of any updates to the issuance of NCC awards.

**Annual Performance Reports (APRs) and Financial Reports**

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even to provide partial or full student scholarships.

Projects that provide Grant Aid to students in their currently approved budgets may continue to distribute those funds to students. Students should be advised that they may use Grant Aid to cover the added costs associated with participation in online activities developed by the project in its efforts to continue to provide services to students, i.e., internet and/or phone services necessary for engagement. Projects must establish measures to document students' participation in online activities.

Grantees that do not have Grant Aid for students in their currently approved budgets, but who wish to reallocate funds for this purpose, must notify their program specialist by submitting a revised budget to their assigned program specialist. Note that under no circumstances can the amount of Grant Aid provided exceed the 20 percent cap as provided by the authorizing statute.

**Upward Bound, Upward Bound Math and Science and Veterans Upward Bound regulations:** Under the Upward Bound, Upward Bound Math and Science and Veterans Upward Bound regulations, 34 CFR 645.42 allows stipends for participants who are enrolled in postsecondary classes on a full-time basis. During the COVID-19 interruption of services, the Department is aware that many institutions are providing distance learning options to students, and as such, a student that continues to be enrolled full-time through distance learning remains eligible to receive allowable stipends.

**Ronald E. McNair Program:** Under the Ronald E. McNair Postbaccalaureate Achievement Program (McNair), the Department is encouraging projects to provide virtual activities and to develop methods to document student participation in those activities in order to receive stipends.

**Other:** For all other TRIO Programs, while direct financial support to participants is not allowed under the HEA, the CARES Act provides additional flexibilities that could include direct financial support to participants. The Department will not permit a grantee to provide cash awards to students under the age of 18; however, based on the flexibilities provided by the CARES Act, the Department will consider requests from other TRIO grantees to provide such support to students 18 or older. Doing so would require prior approval and is not subject to the waiver of prior approval provided for other activities.





- 19.** Can GAANN fellows who graduate this semester participate in activities that were planned to take place in the spring but have now been or will be delayed until after they graduate?

Yes. During the COVID-19 national emergency, the Department will allow graduates to complete graduate fellowship activities, pending approval by the student's institution, following the originally anticipated graduation date. All activities must be scheduled and completed by September 30, 2020.