

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

All other Frequently Asked Questions for the Adolescent Pregnancy Prevention Program on COVID-19 flexibilities have been rescinded and is replaced by this version with updated guidance.

This document provides the Administration for Children and Families' (ACF) interpretation of the Office of Management and Budget's (OMB) <u>M-21-20: Promoting Public Trust in the Federal</u> <u>Government through Effective Implementation of the American Rescue Plan Act and Stewardship of</u> <u>the Taxpayer Resources</u> Appendix 3 - Disaster Relief Flexibilities to Reduce Burden for Financial Assistance. This OMB memorandum was issued on March 19, 2021.

In accordance with the OMB memorandum, the Family and Youth Services Bureau's (FYSB) Adolescent Pregnancy Prevention (APP) Program grantees are subject to the 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.

Several of FYSB's APP state, territory, tribal, faith-based, and community-based grantees continue to have 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, in alignment with the OMB and ACF guidance, 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:** Advanced approval has been waived; however, ACF/FYSB grantees/recipients must continue to seek official approval to avoid any potential disallowance or dispute based on unreasonableness or allocability for the allowable cost proposed or charged to the Federal award related to COVID-19. Grantees/recipients should remain in communication with ACF/FYSB and the ACF Office of Grants Management (OGM) and must continue to act within existing guidelines for use of Federal funds as outlined in the applicable funding opportunity announcement and statutory authority. Grantees must 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 ((financial management) and 45 CFR §75.361 (record retention). Where prior approval had been required per 45

CFR §75.407, grantees must seek 'after the fact' approval and maintain documentation of OGM Specialist and/or Federal Project Officer (FPO) approval.

*Reference:* (45 CFR §75.407)

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

**Answer:** Yes. ACF is allowing OGM, in consultation with FPOs, to allow recipients to delay submission of financial, performance and other reports up to three (3) months beyond the normal due date. If OGM and FPOs allow such a delay, recipients may continue to draw down Federal funds without the timely submission of these reports. These reports, however, must be submitted at the end of the extension period. In addition, recipients must notify ACF/FYSB of problems, delays, or adverse conditions related to COVID-19 on an award by award basis.

Requests for an extension on the submission of reports must be submitted to OGM and FPO at least fifteen (15) business days prior to the original report due date. The request must be submitted on an official letterhead and signed by the Authorized Representative listed on the grant application. It must describe how COVID-19 has directly affected the recipient's ability to submit their report on the original due date. The request must be uploaded to Grant Notes in Grantsolutions.

Reference: (45 CFR §75.328, .342, and .342(d)(1))

SF-425 Federal Financi Annually (Competitive	ial Reports—Due Semi- e Grants)	
Reporting Period	Original Due Ry Date	Extended Due Date (with notification to FPO)
April 1, 2021– September 29, 2021	October 30, 2021	December 30, 2021

SF-425 Federal Financial Reports—Due Annually (State/Formula Grants)		
Reporting Period	Original Due Ry Date	Extended Due Date (with notification to FPO)
October 1 –		
September 30, 2021	December 30, 2021	March 31, 2022

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 Progr	ess Report—Due Semi-Annually	
Reporting Period	Original Due By Date	Extended Due Date (with notification to FPO)
April 1, 2021 - September 29, 2021	October 31, 2021	December 30, 2021

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)).

Reference: (45 CFR §75.341, 45 CFR §75.342, 45 CFR §75.343)

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

**Answer:** ACF/FYSB will be conducting virtual site monitoring visits beginning June 2021. On-site monitoring visits will resume in the future when deemed safe. If your organization is selected and unable to participate in virtual monitoring due to operational limitations, you will need to alert your FPO.

### 4) 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 grantee events via email notification. All topical trainings scheduled through September 2021 will be conducted virtually and the 2022 APP Grantee Conference is tentatively scheduled to be hosted in Atlanta, Georgia in May 2022.

#### 5) Will ACF/FYSB publish Notice of Funding Opportunities (NOFO) in 2021?

**Answer:** Yes. FYSB/APP Program has published five NOFOs and the links to the announcements are below:

- Personal Responsibility Education Program Innovative Strategies (PREIS) <u>https://www.grants.gov/web/grants/view-opportunity.html?oppId=328908</u>
- Personal Responsibility Education Program Competitive (CPREP) <u>https://www.grants.gov/web/grants/view-opportunity.html?oppId=328909</u>
- Tribal Personal Responsibility Education Program for Teen Pregnancy Prevention <u>https://www.grants.gov/web/grants/view-opportunity.html?oppId=328996</u>
- Title V Competitive Sexual Risk Avoidance Education https://www.grants.gov/web/grants/view-opportunity.html?oppId=328895
- Sexual Risk Avoidance Education Program <u>https://www.grants.gov/web/grants/view-opportunity.html?oppId=328896</u>

#### 6) I am implementing my program using a hybrid or in person approach. How can I keep my staff and youth safe?

**Answer:** To help prevent the spread of COVID-19, APP grantees should make Personal Protection Equipment (PPE), including face masks, hand sanitizers, thermometers, and disposable gloves available for all staff and youth while they are attending in-person sessions. Grantees are encouraged to train staff and youth on the proper use of PPE. APP grantees should also have disinfecting products, including disinfecting wipes, disinfecting cleaners, and bleach to clean and sanitize all spaces utilized for programming. Staff should practice physical distancing and implement strategies for youth to also practice physical distancing to help prevent the spread of COVID-19. Grantees should also have in place safety policies and guidelines that align with Centers for Disease Control and Prevention (CDC) as is available in the <u>School Considerations: Readiness and Action</u> Planning Tool, Toolkit for K-12 Schools, and <u>COVID-19 Vaccines for Children and Teens</u>.

## 7) 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, local 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, staff development on addressing crisis and trauma, etc. A few of the available resources to support ongoing youth engagement during the pandemic as listed below:

- <u>Tips for Virtually Engaging Parents & Caregivers During Social Distancing</u> This tip sheet provides you with strategies you can use to reach out to parents virtually and provide them with support and information to help them cope with the challenges of the pandemic situation.
- <u>Toolkit for K-12 Schools</u> Centers for Disease Control and Prevention have a webpage available to provide guidance and tools to help school personnel make decisions to protect their students and staff. This resource may be helpful to grantees that are providing APP Program services in schools and community settings.

### 8) Will budget revisions be allowed to incorporate supplies necessary for virtual services to be provided?

**Answer:** Yes. Budget revisions will be allowed for costs not normally chargeable to awards to support virtual services.

### 9) Will there be other T&TA resources to support grantees that are implementing programming virtually, in-person, or a hybrid?

**Answer:** ACF/FYSB will continue having our training and technical assistance (TA) providers schedule TA, cluster calls, and office hours to support all grantees as they adapt program implementation using a variety of methodologies. Grantees will continue receiving notification of such sessions through e-blasts from the PREP and SRAE training and technical assistance contractors.

### **10)** Will the project period be extended to accommodate for the time lost when grants project periods have an expiration date of September 29, 2021?

**Answer:** ACF guidance must be followed for grantees that submit requests for prior approval of a no-cost extension for projects with an expiration date of September 29, 2021. The Grantee Guidance Document provided to grantees for each APP funding stream provides details on the requirements for no cost extension approval. Also, grantees should contact their FPO or Office of Grants Management (OGM) Specialist for no-cost extension guidance.

For grants that have already received a no-cost extension and to the extent permitted by law, OGM may approve an additional no-cost extension for awards that were active as of March 31, 2021 and scheduled to expire prior or up to December 31, 2021, automatically at no cost for a period of up to 12 months. This will allow time for recipient assessments, the resumption of many individual projects, and a report on program progress and financial status to POs and OGM. Project-specific financial and performance reports will be due 90 days following the end date of the extension.

OGM and the FPO will review any no-cost extension request beyond the first 12 months that does not meet the aforementioned date requirements on a case-by-case basis.

If this is the grantee's first no-cost extension request not extending the project beyond 12 months, please work with OGM per the usual procedures.

ACF will examine the need to extend other project reporting as the need arises.

*Reference: (45 CFR §75.309)* 

#### 11) Will extension be granted for the closeout of grants slated to expire in September 2021?

**Answer:** ACF is allowing OGM, in consultation with FPOs, to allow recipients to delay submission of any pending financial, performance and other reports required by the terms of the award for the closeout of expired projects, provided that proper notice about the reporting delay is given by the recipient to OGM.

Requests for an extension on the submission of closeout document must be submitted to OGM and FPO at least fifteen (15) business days prior to the original report due date. The June 22, 2021

request must be submitted on an official letterhead and signed by the Authorized Representative listed on the grant application. It must describe how COVID-19 has directly affected the recipient's ability to submit their closeout documents on the original due date along with the planned submission date. The delay in submitting closeout documents may not exceed one year after the award expired. This request must be uploaded to Grant Notes in Grantsolutions.

(45 CFR §75.381)

#### 12) Will there be flexibility with SAM registration/recertification?

**Answer:** Yes. If not registered at time of award, recipients must obtain a unique entity identifier and complete SAM registration within 30 days of the Federal award date. Current registrants in SAM with active registrations expiring between April 1, 2021 and September 30, 2021 will automatically be afforded a one-time extension of 180 days.

#### Performance Measures and Evaluation FAQs

#### 1) When is the deadline for submitting the next round of performance measures?

**Answer:** The next round of SRAE and PREP Performance Measures will be submitted to the respective portals between July 1 and August 16, 2021. For this round, grantees will submit

- a. Measures of structure, cost, and support for the period of October 2020 through September 2021 grant year, and
- b. Measures of attendance, reach, and dosage collected between January through June 2021; and
- c. Participant entry and exit surveys administered from January through June 2021.

## 2) 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 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 anticipate challenges with collecting or reporting on these measures.

### 3) 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.

### 4) Are SRAE and PREP grantees required to shift to online data collection for participant entry and exit surveys as part of their performance measures?

**Answer:** No, online data collection is not required. However, grantees are encouraged to consider using online data collection methods for administering participant entry and exit surveys, particularly if the grantees provide online programming and completing paper-and-pencil surveys is not possible.

Please note that PREP and SRAE grantees are still required to collect and report on the OMB-approved (federal) performance measures. If you are not collecting data online, you should consider other ways to collect data, including in person, by telephone, or by mail.

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

**Answer:** There are several existing resources available to grantees to support the transition to online data collection. Past materials and upcoming events on online data collection for SRAE grantees can be found at <u>www.sraepas.com</u> and for PREP grantees can be found at <u>https://www.prepeval.com/</u>. Grantees that are switching to an online platform can also request technical assistance through their FPO to learn about methods and strategies to build their capacity.

# 6) 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:** See response above to question #10 (Programmatic and Fiscal Related FAQs) above.