

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

**FREQUENTLY ASKED QUESTIONS AND ANSWERS**

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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 far as possible under the grant using 85.005 or distance 3.521(e) after 311(d) (we-if)

Communication through mail or conference calls or the othe

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.

If projects cannot conduct virtual activities for the foreseeable duration of the COVID-19 pandemic, the Department will evaluate the ability of a project to resume project activities as part of the grantee's no-cost extension request or continuation award.

For more information about providing distance learning opportunities for students with disabilities, please see: Fact Sheet: Addressing the Risk of COVID-19 in Schools While Protecting the Civil Rights of Students (March 16, 2020); Supplemental Fact Sheet: Addressing the Risk of COVID-19 in Schools While Protecting the Civil Rights of Students (March 16, 2020).

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-

iii. In identifying a revised expiration date, the grantee must identify the actual time

even to provide partial or full student scholarships. Please see the Department's COVID-19 website for more information at: <https://ed.gov/coronavirus>

### **Waivers for Prior Approval Requirements**

#### **13. Will there be any waivers to prior approval requirements?**

While under normal circumstances grantees are required to obtain prior approval from their ED program specialist before making changes in the program or allocation of funds under [2 CFR 200.407\(d\)](#), as a result of significant disruptions caused by COVID-19, the Department is exercising its authority under OMB Memorandum M-20-17 and will temporarily waive the prior-approval requirement for the programs covered by this guidance during the period between March 13, 2020 and September 3, 2020.

Grantees must notify the program specialist of any changes to the project activities or budget prior to making them, and should retain appropriate documentation to support those changes, which must also be reported in the grant's APR.

### **Carryover**

#### **14. If as a result of COVID-19 disruptions, a grantee is unable to conduct certain of its proposed activities, will they be allowed to carryover funds to budget period 2020-2021?**

The Department understands the nature of COVID-19 disruptions and will work collaboratively with grantees to determine appropriate carryover amounts for budget period 2020-2021. Grantees should contact their ED program specialist to initiate this discussion.

## **GUIDANCE THAT APPLIES TO TRIO, GEAR UP, and GAANN GRANT PROGRAMS**

### **Financial Support for Students**

#### **15. Is it permissible to provide direct financial support to students from existing grant funds, especially those that had to leave institutions or those in need of food, shelter, and/or other basic needs?**

This depends on the allowable costs associated with your grant program:

**Student Support Services Program:** Under the Student Support Service Program regulations, in addition to Grant Aid, 34 CFR 646.30(j) allows for the use of project funds to provide temporary housing during breaks in the academic year for homeless students, children and youths or were formerly homeless children and youth, and students who are foster care youth.

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



that are incurred in connection with such enrollment or attendance (see

