



## Spending Down CARES Act Funds for FVPSA Grantees

FVPSA grantees (including States, Tribes, DV Coalitions and local DV programs) have until 9/29/21 to use their CARES awards. Any unspent funds will be reverted back to Treasury. Carry-over and extension requests cannot be granted. Grantees should consult their State Administrator, Grants Specialist or Federal Project Officer for questions or clarifications about obligation and liquidation deadlines.

The two main sources of guidance on the flexibility that agencies and Tribes have in using CARES funds to prevent, prepare for and respond to COVID-19 are:

- [FY 2020 Coronavirus Aid Relief & Economic Security Act \(CARES Act\) Allowable Use of Funds for FVPSA Grantees \(States, Tribes & DV Coalitions\)](#)
- [FAQs on Allowable Use of FVPSA Funds during the COVID-19 Public Health Emergency](#)

### Suggested Spending Strategies & Regulatory Considerations

*(see farther below for more examples of allowable expenses and how you can find help)*

- 1) If you haven't yet billed other grants for recent expenses in the current fiscal year, you may want to allocate them to this CARES Act award (following your established cost allocation plan<sup>i</sup>). You'll need to consider the fiscal periods of all your grants, and whether or not a budget modification may be needed<sup>ii</sup>.
- 2) Look for **big-ticket items** (this minimizes your administrative effort). Some of the largest expenses relate to staff, housing assistance and equipment (incl. vehicles). Examples are shown in **green** below.
- 3) Invest in your team with raises, **appreciation/hazard pay<sup>iii</sup> and stipends** (following federal guidance<sup>iv</sup> with written, Board-approved policies and your established cost allocation plan<sup>v</sup>). We understand that for tribal programs the process to accomplish this will be different from non-profits.
- 4) Grantees have a great deal of flexibility in **paying for survivors' needs**. Direct cash assistance to survivors is *not* permitted; however, payments to 3<sup>rd</sup> parties (e.g., landlords, utility companies, schools) are allowable. **Covering survivors' housing expenses is a particularly good option** – covering these with CARES Act funds helps bypass other, more complicated housing programs.

- 5) You can **purchase vehicles and large pieces of equipment**<sup>vi</sup>. Any vehicle purchase, and any equipment purchase over \$5,000 requires prior approval from your State Administrator, Grants Specialist or Federal Project Officer<sup>vii</sup>, so submit your request no later than 8/31/21. It may take a while to order these products and you may experience unforeseen delays in delivery due to COVID-19. These purchases must be spread across funders following your cost allocation plan<sup>viii</sup>. There are other specific purchasing and reporting requirements related to these items<sup>ix</sup>.
- 6) **This is an opportunity to build your organizational capacity.** Grantees can put in place contracts for consultant projects related to your organizational development needs, as well as items for traditional and cultural practices that promote healing. You'll need to follow appropriate procurement processes and spread these expenses across funders per an established cost allocation plan<sup>x</sup>. Under certain conditions, you may be able to charge the costs of a contract even though some of the services will be performed after 9/29/21 (please discuss with your Federal Program Officer if you plan to use funds in this way).
- 7) If you anticipate significant budget category variances, you will need to **submit a budget modification to FVPSA by 8/31/21 for approval** before you can spend those funds<sup>xi</sup>.

## Spending Examples

*(see above and the endnotes for federal guidance and grant requirements)*

### a. Personnel<sup>xii</sup>

- Provide livable wages<sup>xiii</sup> through salary increases
- Offer work from home allowances, **incentive pay (i.e., bonuses), appreciation/wellness/hazard pay** (see sample policies<sup>xiv</sup>)
- Provide additional **salary bumps for specialized knowledge/skills** (e.g., survivors' lived expertise, 2<sup>nd</sup>-language skills, documented experience working with un/underserved communities)
- Be careful salary increases don't negatively impact staff (e.g., taxes, unemployment benefits)

### b. Fringe Benefits<sup>xv</sup>

- Provide employee stipends (i.e., child care, mental health/counseling, fitness programs, commuter stipends, tech stipends, healthcare stipends for part-time staff, etc.)
- Cover roadside assistance plans for employees conducting mobile advocacy

### d. Equipment<sup>xvi</sup>

- Vehicles to support mobile advocacy, survivor pick-ups, transports to/from court/services, child transports to school/child care/activities can be purchased with CARES Act (as well as FVPSA and ARP) funds
- Mobile advocacy vehicles may include automobiles, trucks, 4-wheel vehicles, transportation watercraft, RVs
- Include auto maintenance/service/warranty packages
- Examples of other auto expenses are listed below (*see Section H. Other*)

### e. Supplies<sup>xvii</sup>

- Household **appliances** for shelters and for survivors' apartments/homes (i.e., washer/dryer, refrigerator, oven)
- Household supplies for shelters and for survivors' apartments/homes (i.e., personal protective equipment, beds, furniture, annual supplies of food, clothing, toiletries, diapers, hair products)
- Items for traditional and cultural practices that promote healing

**(Supplies, continued)**

- Wellness care packages for survivors and their children
- Utility fees for gas, fuel oil and propane for programs and for survivors
- Generators, air filtration equipment, space heaters, window air condition units (installation costs *not* allowed)
- IT upgrades for programs and for survivors (i.e., laptops, audio/video equipment for tele-conferencing)
- Assistive devices for people with disabilities
- Breast pumps and related equipment for nursing mothers
- Crates, pet food and other supplies if housing pets with survivors

**f. Contracts<sup>xviii</sup>**

- Contracts with hotels/motels for emergency shelter
- Legal fees for eviction proceedings and DV related legal issues
- Counseling services for survivors and their children; clinical supervision for staff
- Kennel / boarding services if survivors' pets cannot be housed
- Interpretation and translation services (i.e., translate agency materials and website)
- Organizational capacity-building services (i.e., strategic planning, training and technical assistance, needs assessments, evaluation/research support, Board development, fiscal management services)
- Communication, graphic design and marketing services (e.g., re-design/upgrade website, multi-media & multi-lingual outreach materials that reflect new services, mobile advocacy, etc.)
- IT assessment and infrastructure plan (i.e., contract IT expert to develop plan for remote work); virus protection plans; Zoom accounts for tele-conferencing

**h. Other<sup>xix</sup>**

- Third-party payments to cover **survivor housing and related expenses** (back to start of your current fiscal year)
  - Rental subsidies, late fees, back rent payments
  - Utilities (i.e., deposits, monthly charges, amounts owed)
  - Application/credit fees, first/last month rent deposits<sup>xx</sup>
  - ID replacement
- Cover other survivor expenses:
  - Car repairs, new tire/snow tire/chain purchases, roadside maintenance plans
  - Travel for relocation
  - Medical expenses
  - Education & employment expenses (i.e., laptops, cameras, headsets, tuition, training/certification programs, books, educational supplies, uniforms, transportation)
- Professional development stipends for employees (e.g., trainings, certifications, clinical supervision, books, resources, materials, conferences, professional memberships, subscriptions)

**Need Help?**

- |                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                               |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>✓ Contact Your FVPSA Federal Project Officer or State Administrator</li> <li>✓ Contact the following Technical Assistance Providers:</li> <li>✓ <a href="#">Alaska Native Women's Resource Center</a></li> </ul> | <ul style="list-style-type: none"> <li>✓ <a href="#">Domestic Violence and Housing Technical Assistance Consortium</a></li> <li>✓ <a href="#">National Network to End Domestic Violence</a></li> <li>✓ <a href="#">National Indigenous Women's Resource Center</a></li> </ul> |
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## Office Hours

*Log-in, ask questions, hear others' ideas and get customized help*

### FVPSA Office Hours

- **Thursday, 8/26/21, 3:00 – 4:00 pm ET**  
<https://hhs.webex.com/hhs/j.php?MTID=m95d4266328caae579acafe359b8b8b63> +1-415-527-5035; Access code: 199 970 4089
- **Monday, 8/30/21, 3:00 – 4:00 pm ET**  
<https://hhs.webex.com/hhs/j.php?MTID=m8ea79c18ca435ee4e439aa984726ec9e> +1-415-527-5035; Access code: 199 462 0645
- **Friday, 9/10/21, 1:00 – 2:00 pm ET**  
<https://hhs.webex.com/hhs/j.php?MTID=ma5395e3da34734c2a7273f66eca70eb5> +1-415-527-5035; Access code: 199 785 2087
- **Thursday, 9/16/21, 3:00 – 4:00 pm ET**  
<https://hhs.webex.com/hhs/j.php?MTID=m168611703a49f4f371450cbd8f58b484> +1-415-527-5035; Access code: 199 441 3213
- **Tuesday, 9/21/21, 3:00 – 4:00 pm ET**  
<https://hhs.webex.com/hhs/j.php?MTID=m168a002269225ec2e547c04b2ad03d39> +1-415-527-5035; Access code: 199 391 1279
- **Monday, 9/27/21, 2:00 – 3:00 pm ET**  
<https://hhs.webex.com/hhs/j.php?MTID=mc32b2acc3420480dd9f1d49730d54864> +1-415-527-5035; Access code: 199 527 4834

### National TA Providers Office Hours

- **Friday, 8/27/21, 4:00 - 7:00 pm ET**  
<https://nnedv.zoom.us/j/97938732826>  
 Meeting ID: 979 3873 2826  
 Dial by your location:  
 +1 669 900 6833 US (San Jose)  
 +1 253 215 8782 US (Tacoma)  
 +1 346 248 7799 US (Houston)  
 +1 646 558 8656 US (New York)  
 +1 301 715 8592 US (Washington DC)  
 +1 312 626 6799 US (Chicago)  
 Find your local number:  
<https://nnedv.zoom.us/j/97938732826>  
<https://nnedv.zoom.us/u/adfCMz1u2T>

<sup>i</sup> Cost allocation: [45 CFR §75.407](#) & [45 CFR §75.439](#).

<sup>ii</sup> Budget modifications: [Uniform Administrative Guidance §75.308](#). The following all require budget modifications approved by FVPSA: (a) Variances of 25% or more for grants *under* \$250,000; (b) Variances of 10% of more for grants *over* \$250,000; and (c) Variances of 10% or more for *formula grants* (e.g., Coalitions & Tribes). [Sample budget modification form](#).

<sup>iii</sup> [Sample Hazard Pay Policies](#).

<sup>iv</sup> Employee compensation: [Uniform Administrative Guidance §75.430](#) & [fringe benefits](#).

<sup>v</sup> Cost allocation: [45 CFR §75.407](#) & [45 CFR §75.439](#)

<sup>vi</sup> Updated Guidance: [Vehicle Purchases with FVPSA CARES Act funds](#) (8/3/21).

<sup>vii</sup> Equipment & other capital expenditures: [45 CFR § 75.439](#).

<sup>viii</sup> Cost allocation: [45 CFR §75.407](#) & [45 CFR §75.439](#)

<sup>ix</sup> [ACF Tangible Personal Property Guidance](#).

<sup>x</sup> [Uniform Administrative Requirements, Cost Principles & Audit Requirements for HHS Awards](#) at 45 CFR §75 (particularly sections on [§75.403 Factors affecting allowability of costs](#), [§75.404 Reasonable costs](#), [§75.405 Allocable costs](#)), as well as the [Allowable Uses for CARES Act Funds](#) document from FVPSA.

<sup>xi</sup> Budget modifications: [Uniform Administrative Guidance §75.308](#). The following all require budget modifications approved by FVPSA: (a) Variances of 25% or more for grants *under* \$250,000; (b) Variances of 10% of more for grants *over* \$250,000; and (c) Variances of 10% or more for *formula grants* (e.g., Coalitions & Tribes). [Sample budget modification form](#).

<sup>xii</sup> "Personnel" refers to costs of employee salaries & wages.

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<sup>xiii</sup> [Livable Wage Calculator](#)

<sup>xiv</sup> [Sample Hazard Pay Policies](#)

<sup>xv</sup> "Fringe Benefits" entails costs of employee fringe benefits (*unless treated as part of an approved indirect cost rate*).

<sup>xvi</sup> "Equipment" means an article of nonexpendable, tangible personal property having a useful life of more than 1 year per unit & an acquisition cost that equals or exceeds the lesser of: (a) The capitalization level established by the organization for the financial statement purposes, or (b) \$5,000. (*note: Acquisition cost means the net invoice unit price of an item of equipment, including the cost of any modifications, attachments, accessories or auxiliary apparatus necessary to make it usable for the purpose for which it is acquired. Ancillary charges, such as taxes, duty, protective in-transit insurance, freight & installation, shall be included in or excluded from acquisition cost in accordance with the grantee's regular written accounting practices.*)

<sup>xvii</sup> "Supplies" refers to costs of tangible personal property other than those categorized as Equipment. This includes office & other consumable supplies with a per-unit cost of less than \$5,000.

<sup>xviii</sup> "Contractual" expenses includes costs of contracts for services & goods, except for those that belong under other categories (e.g., equipment, supplies, etc.). This includes contracts with secondary recipient organizations & specific projects/businesses to be financed by the grantee. This area is not for individual consultants (those should fall under Other).

<sup>xix</sup> "Other" entails expenses related to consultant costs; local travel; insurance; food (when allowable); medical & dental costs (non-contractual); professional services costs (including audit charges); space & equipment rentals; printing & publication; computer use; training costs (such as tuition & stipends); staff development costs; administrative costs.

<sup>xx</sup> When tenancy ends, deposits must be returned to the Program (not direct cash to survivor).