

COVID-19 Pay Differential Policy

[Program Name] is currently operating under COVID-19 emergency procedures due to the COVID-19 public health pandemic. As much as possible, [program name] staff will be working remotely and providing direct services via telephone, on-line video conferencing, or other methods that do not require face-to-face interaction. Health officials have indicated that COVID-19 is very contagious and face-to-face interactions may be hazardous. Additionally, any face-to-face interactions with clients should include the use of personal protective equipment (masks, gloves, protective gowns) and the practicing of other good hygiene actions such as sanitizing commonly touched areas, washing hands often, covering coughs with a tissue or sleeve, and using hand sanitizer between hand washings.

[Program name] provides shelter services which require staff to have face-to-face interactions with clients in the shelter setting, including providing food, supplies, and support to families in the shelter facility who are in danger and/or experiencing emotional crisis due to sexual and domestic violence. Due to widespread shortages, [program name] has been unable to obtain the full range of necessary personal protective equipment (PPE) for staff, including masks, hand sanitizer, disinfecting wipes, gloves and gowns. As a result, staff/advocates who provide services in the shelter setting may not be fully protected or have necessary PPE during their time at work.

[Program name] is, therefore, offering a COVID-19 pay differential to those staff who work in the shelter during this public health pandemic. This COVID-19 pay differential will be \$XX/hour on top of the staff's regular hourly rate of pay. This rate of pay only applies to those staff working in the shelter. [Program name] will comply with all applicable state and federal labor laws and will pay overtime as required by law. This COVID-19 pay differential is retroactive to [DATE when organization began working remotely] and will be available until state public health officials have indicated that the public health emergency no longer requires such restrictions on face-to-face interactions.

Presented to and approved by the [Program Name] Board of Directors on [date]

When deciding whether to adopt this policy, consider this Guidance from OVW: "Hazard pay is subject to the same requirements in 2 C.F.R. § 430 as any other type of compensation. As stated in OVW's COVID-19 guidance, recipients (and subrecipients) may continue to charge salaries and benefits to their awards consistent with their policy of paying salaries and benefits under unexpected or extraordinary circumstances from all funding sources (Federal and non-Federal). As is the case for all compensation costs charged to an OVW award, any hazard pay must be reasonable, consistent with the recipient or subrecipient's policy, and applied in the same manner to both federally and non-federally funded staff. In developing and applying their policies on what constitutes a hazard in the context of COVID-19, recipients and subrecipients may look to federal, tribal, state, or local guidelines. Recipients are required to maintain copies of their policies and cost documentation (as required by 2 C.F.R. §§ 200.302, 200.333, and 431(b)(1)) to substantiate the charging of salaries and benefits to their awards."