# ESEA Office Hours Q & A 6.25.2020

## GEER Funding Update

* No Questions

## CRF

Q: Do we get assigned funding or apply?

A: The CRF have already been distributed to districts. There is no application process for these funds. We prefer knowing upfront if a district could not use all their funds so that we can reallocate those funds.

* Follow ups on last week’s questions:
  + “Substantially different” defined? What personnel expenses can be covered with CRF funds?
    - The OSC came out with some payroll eligibility guidance. The flow chart does not address a fiscal YR21 expense. Use this side-by-side with CDE guidance to address these questions.
    - Will be revisiting this question in future ESEA office hours.
  + Can CRF funds be used to pay for sick days?
    - It is allowable. This guidance has not been posted on the CDE website yet.

Q: We are trying to create outdoor classrooms (related to COVID response). We need shade and outdoor tables perhaps some portable heaters. Are these allowable?

A: Response is included in the allowable uses document. If a purchase meets the capitalized threshold, it is not allowed.

Q: Is leasing a space a possibility to expand useable area?

A: Yes, this is allowable for the fall term through December 30th. Other funds would need to cover the lease starting in January 2021. Leasing is listed as allowable for ESSER and CRF funds.

Q: Who will that form go to -- asking as a lot of people are out now?

A: This form will go to the finance list serve and in a CDE update.

Q: In a synchronized learning / blended learning situation, Is providing child care for teachers permissible.

A: Yes, in-school child care that is aimed at facilitating compliance with COVID-19 public health measures and to mitigate the second-order effects of COVID19 through the provision of economic support, such as increasing instructional hours to enable the State’s workforce return to work. (Treasury Guidance - 4. and 5.)

Q: With the huge delays on laptops and devices for students, there is a chance some may not be RECEIVED by 12/30 but have been ordered as of today. Are these still allowable under CRF? Are they only allowed if received by 12/30?

A: Yes, if they are OBLIGATED by 12/30. You must have a purchase order in and committing those funds.

Q: In either CRF or ESSER is it allowable for 20-21 to pay for health assistants (not nurses) to help with both screening & contact tracing?

A: That would be very parallel to the allowable use for nurses and seems very directly tied to COVID response, so yes. We can add health assistants to our guidance document going forward, as well. The only constraint is that the CRF funds would only apply through December 30. The US Treasury's FAQ document states: The Guidance says that funding can be used to meet payroll expenses for public safety, public health, health care, human services, and similar employees whose services are substantially dedicated to mitigating or responding to the COVID-19 public health emergency. How does a government determine whether payroll expenses for a given employee satisfy the “substantially dedicated” condition?

## ESSER-Rural District Support and Guidance:

Q: If the new Opening Up America FEMA action includes schools, can either CRF or ESSER funds be used to offset the district's 25% portion of the FEMA requirement?

A: No answer; will need an answer.

Q: If we want to split cost a one-year software license for online learning between CRF & ESSER (so CRF - July-Dec & ESSER Jan-June) is that allowable? Yes, this is allowable.

Q: The non-public calc is for both ESSERS and CARES funds now?

A: The CARES act has a number of different funds, the Education Stabilization fund and CRF. The funds under the education stabilization fund need to be equitable to all schools, including non-publics.

Q: Any guidance for charters and if we have to do a pass through or we can do reimbursement for those funds?

A: CRF funds should be a pass-through on a per-pupil basis. CRF should be accounted for using Flow Through Coding. The district receives the money as a payment from CDE. The district then flows the payment to charter schools using Object Code 0594. A charter school receives the funds and records the funds as … Charter school spends funds on allowable expenses. The district should be providing guidance to the charter schools to ensure the correct coding is used.

Q: If a charter school does not want to participate in ESSER can we make a note of that in the application? Could see this be a possibility if they struggle with the CRF allocation spend down.

A: No check that a charter school has been allocated ESSER funds. Do not have a check regarding the allocation of funds to every charter school.

Q: Direct payment to charters? required or recommended? Are there reporting requirements for charter and CRF?

A: For CRF this is required. CRF funds should flow through accounting.

Q: Does the charter use the grant code 4012 on their expenditures?

A: Yes

Q: Is the district required to review the charter's expenditures for allowability? Or can we just flow through the revenue to them and let them spend it on their own without reimbursing those expenditures after we review them? Since CRF is included on the SEFA we thought we may need to review their expenditures first.

A: Any guidance that districts receive regarding allowable costs need to be shared with charter school officials. It would not be ok to give charter schools carte blanche. They need to be aware of the specific guidance. The charter schools should be monitored in the same manner and with the same level of control as the use of other federal awards.

Q: These are federal dollars; so are the charter schools considered a sub-grantee of the district (and, therefore, requiring subrecipient monitoring by the district)? Specifically about the SEFA requirements (The team will look up more information about this).

A: No, charters are not sub-grantees. CDE does not allow sub-granting. The district receives the award for CRF funds, then the district is the fiscal agent, the risk is on them, this requires coordination with charter schools.