# ESEA Office Hours Q & A 9.17.2020

## NPS Interim Rule

Q: If we choose as a district to support all enrollment for nonpublic schools, can we continue this way or do we have to redo and only count their T1 students for ESSER funding?

A: You will need to re-do that calculation depending on whether you have obligated funds to the NPS or not.

Q: Did DPS include neighboring district students in their count?

A: Yes, DPS included Neighboring District Title I eligible students.

Q: Do we use FRL numbers from 19-20 or the numbers we will be reporting for 20-21?

A: We will not have the numbers from 20-21. Unless you are planning on submitting your application in December, we recommend that you use the FRL numbers from 19-20.

Q: So DPS only gave charters FRL count allocations? Why didn't you do per pupil for all students?

A: This is a good question. We wanted there to be consistency. We budget private schools under FRL and wanted to keep this the same under ESSER and expanded this method to all charter schools.

Q: Is DPS using ESSER for all students at district level or only Title schools?

A: This was based on FRL, so there are not separate allocations determined for our district-managed schools. The allocations can be applied to all students in the non-public schools because ESSER funds are not held to Title I requirements. Districts can use whatever calculation makes sense for their district.

Q: So, just to be sure I understand - we are not allowed to give our NPS per pupil allocations but MUST use the Sec. 1117 basis to determine their allocations - correct?

A: That is correct. You will use 1117 proportionate share rules to determine what amount of money will be available for services and supports. No checks are to ever go to NPS for dollars.

## Connecting Colorado Students Grant (CCSG)

Q: Will these funds pay for past due balances so families can connect again?

A: If that is the reason families are not able to connect to the internet, this funding can pay for that connectivity. We want to make sure that the services being provided will be available for the full school year. This also applies to educators.

Q: Can we get a waiver to reimburse non-public schools if a receipt is provided?

A: There is not a waiver to reimburse NPS. Once a NPS receives federal funding, they now must comply with all federal and reporting requirements. The only possible way for a NPS to be reimbursed if the provider reimburses the NPS and then bills the district. We are not aware of a waiver currently.

## CRF & RISE

Q: CRF Question: Is employee leave (up to 80 hrs) and substitute costs allowable for days not worked waiting for COVID test results when the District requires an employee to get tested for COVID due to state guidelines before coming back to work and if the results are negative. Would the employee leave and sub pay still be allowable?

A: Those expenses should be allowable for CRF as they are connected to COVID response.

Q: So, Q2 tab is still only July-Sept correct?

A: Yes, correct

Q: Would overtime for our payroll clerk be considered admin costs? She is working overtime to process additional timesheets for extra duty pay due to COVID?

A: Yes, that is allowable as long as it can be tied to COVID response.

Q: Is just additional BASE need allowable -- nothing was cut, but there could be additional need?

A: If you must increase your BASE to facilitate dealing with COVID 19, yes, the additional percentage above your BASE would be an allowable CRF expenditure.

Q: What if we planned to continue at same levels, but due to social distancing we must hire or have more staff available to separate students?

A: Yes, just document it! Remember when you document indicate the climate, the level of closure or restriction, etc., to provide a good picture of the situation.

Q: If we have hired FTE and their job duties are all COVID related, can we just do the bi yearly Time & Effort documentation, or do we have to do something monthly?

A: If the job duties are similar to a Paraprofessional who would submit bi-weekly, then the same method would be true for this position. We encourage you to highly document that they are working on COVID related activities and that you can provide evidence thereof if you are ever audited.

Q: It was mentioned that some of the CRF reporting categories at the TOP of the report might be removed (instructional - salary, support-supplies, etc). Is that still possible?

A: This is still in the works. We are trying to look ahead to any data that data pipeline will not be able to provide.

Comment: Can you send it out ASAP- waiting another week for this information with a deadline in a month is problematic.

Answer: Absolutely, I should have an answer I am hoping in the next day or two and then will re-post the CRF Reporting workbook with updates if necessary :)

Q: Do you know what the spend deadline will be?

A: December 30, 2020

Q: What is the distribution methodology to districts if based on at-risk increase, distribution from district to charters? Will this have a separate grant code?

A: CDE will need to look at this and come back with an answer.

Q: We are offering free meals to everyone so not as many families are completing the FRL applications; may negatively impact our at-risk numbers?

A: You should not encourage this but these free meals expire in December so you will need the applications and documentation to continue this in January.

Q: So, the calculation is based on an increase from the budgeted at-risk, not from last year's actual at-risk?

A: Look at your calendars to see if you need the waivers. You need documentation from last year to carry it over to this year.

Q: Sorry I missed will there be a new grant code for this new/next CRF fund allocation?

A: Grant Code 5012, Source Code 4000. Yes new grant code entirely, new workbook for reporting but will be identical, same categories and same due dates.

Q: When is the FRL extension due?

A: September 15, 2020 but preferrable before October 1, 2020. There is no form but it is an email or letter outlining that you are requesting a waiver to accurately count FRL.

Q: is there any more talk about a waiver for rank order for title I?

A: It is being treated as a grant and is subject to the reporting requirements. We will be talking more about this at the next Committee of Practitioners meeting.

Q: are the distribution amounts for the district posted for this grant?

A: The distribution amounts are not yet calculated. Yes, the same CRF guidance applies for expenditures for the $37million.