

**Collected Questions & Answers from the Online Sessions
Elementary and Secondary School Emergency Relief Fund (ESSER)
May 21 & 22, 2020**

GENERAL QUESTIONS

1. Q: *Where is the application in CCIP?*

A: The application can be found in the 2019-20 application under Consolidated Related Documents.

2. Q: *Do supplement-not-supplant restrictions apply to ESSER funds?*

A: No.

3. Q: *If an application is submitted after June 1, 2020 what will be the substantially approved date? Will we be able to charge back to March 13, 2020, which is the project period established by the USDOE?*

A: The June 1st deadline is a soft deadline. Our goal is to make funds available to LEAs during the 2019-20 fiscal year, which is where this deadline came from. If applications are received after this deadline, the funds will not be forfeited; however, probability is that applications received after this date would not have funds released until the new fiscal year. This grant is initially awarded during the current fiscal year and is intended to help mitigate COVID-19 related barriers, thus you would be allowed to charge back to March 13, 2020.

4. Q: *Does my application have to go to Chief Administrator approved again?*

A: Yes.

5. Q: *When calculating total student enrollment do we include Pre-K enrolled students? If so, and the non-public school also has Pre-K enrolled students do we count them for their student enrollment number?*

A: No. When calculating enrollment, you would only use students ages 5-17 for both the private and public schools.

6. Q: *What types of stakeholder input do we need to document?*

A: There is no requirement for stakeholder input with this grant as it is intended to offset the impact of COVID-19.

7. Q: *Can a person currently paid from PRC 050 work on the administration of the program (PRC 163) OR does the person have to be paid from PRC 163 and 050? Also, since administration of the program (PRC 163) is similar to multiple federal programs, is time and effort captured under a PAR or semi-annual certification?*

A: Time and effort should be captured on a PAR when multiple PRCs are funding the position. If the staff member is only funded from PRC 163 then a semi-annual certification will apply.

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8. Q: Does submission of an application with errors cause a delay with application approval and allotment of funds?

A: Unfortunately, yes. We recommend consulting the "Application Checklist" document shared during the recent Q/A sessions and sent out on the Federal Program listserv.

9. Q: June 1st feels early for the submission of these applications, since we don't yet know what re-opening will be able to look like. Will we be able to amend this application at a later time as needed? How will that work?

A: Yes. See item 22 below.

10. Q: Will we see PRC 163 budget in CCIP too? Meaning do we need to submit that a few days prior to submitting entire app so both are in?

A: No, but we will begin review when the following three things are done: 1) the application is uploaded into the Consolidated Related Documents section of CCIP 2) the status of CCIP is moved to Chief Administrator Approved level and 3) the PRC 163 budget become available for review in BAAS; which happens 24 to 48 hours after it is submitted by the LEA.

11. Q: What type of tracking and inventory is going to need to be done with devices purchased with these funds? For example, if we buy hotspots, are we going to have to produce those hotspots 5 years from now or even 2 years from now for a monitoring visit?

A: The LEA should use the same process for fixed assets with this grant as it does with other federal programs.

12. Q: Does the budget need to be submitted by June 1 or approved by June 1?

A: June 1st is a soft deadline to submit the budget. It is not required that an LEA submit by June 1st, but this deadline is recommended if the LEA would like these funds to flow during this fiscal year.

13. Q: PRC 163 applications are due June 1, 2020. Is it true that if your district does NOT submit an application by the deadline, you will NOT receive funding for this PRC in the upcoming fiscal year until the state budget funding goes out?

A: No. Applications received after the deadline will receive access to funds in the next fiscal year (2020-21). It is anticipated for funds to begin dropping in mid-July for applications received after June 1st.

14. Q: If we are going to use a vendor that has an approved sole source waiver in place for 2019-2020 school year, can that waiver apply to PRC 163? Or do we have to resubmit?

A: Resubmission would only be required if you are amending the currently approved plan/contract. Please follow specific guidance released from the school business and finance division.

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BUDGET

15. Q: *Where can I find the Chart of Accounts for PRC 163?*

A: It is available in BAAS. It is also available, along with supporting documents [here](#).

16. Q: *How do I submit my budget?*

A: Your budget for PRC 163 will be submitted in the same manner as other federal funds, through your pre-BAAS software that will load to BAAS.

17. Q: *If apply by June 1 and get money this fiscal year, will a second budget submission after July 1 be required?*

A: Yes. In order for LEAs to be able to submit budget amendments, a carryover budget will have to be submitted.

18. Q: *Do I use the 860 department code (a.k.a. site code) for private schools when I complete the budget?*

A: A district has several options with the timing of private school consultations and the submission of the application for ESSER funds. These options are:

Option 1: Submit the ESSER Fund application and associated PRC 163 budget prior to completing the consultations with private schools.

A) Submit an initial budget with a reasonable estimate at site code 860 that is based on anticipated participation, if such an estimate can be made. Once consultations have been completed, amend the budget to adjust the amount of funds at site 860 to match the actual proportionate share amount.

B) Submit an initial budget with no funds at site code 860. However, if this option is selected, the district must maintain sufficient funds in unbudgeted reserve to cover any anticipated proportionate share that might be determined in the consultations. Once consultations have been completed, amend the budget to place all required proportionate share funds at 860.

Note: With either iteration of Option 1, all consultations and budget amendments must be completed no later than August 31st.

Option 2: Submit the ESSER Fund application and associated PRC 163 budget after the consultation with private schools has been completed. With this option, the initial budget must include all proportionate share funds at 860.

19. Q: *Can we use some of the ESSER funds for indirect costs?*

A: Yes. LEAs are allowed to use the same percentage of funds for indirect costs as allowed in other federal funds.

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20. Q: *When we create our plan do we need to make sure it is at the school level in BAAS?*

A: No. These funds are treated like Title II funds and are for the district to allocate as they best see fit. The funds can remain at the district level, can be budgeted at the school level, or a combination of the two.

21. Q: *Will CCIP need to “read” our budget in BAAS before we are allowed to submit our application?*

A: No, but Program Administrators will review budgets and applications at the same time.

22. Q: *Will we have the flexibility to adjust our district plan and move funds easily between codes in BAAS as our district plans evolve and change?*

A: Yes. It’s common for the amounts of funds in the budget line items to change, even though the plans are not being substantively altered from what has been approved in the application. In cases where plans do need to be substantively altered or when new plans need to be added, contact your DPI program administrator to describe any new plans and strategies prior to submitting the budget amendment.

23. Q: *If part of our sanitation priority requires the purchase of sprayers along with the solution. However, we are only seeing supplies listed and not equipment. Can you clarify if sprayers would be allowed under the sanitation supply code?*

A: If there is a budget code you would like to have added to the chart of accounts for this PRC, please email your request to alex.charles@dpi.nc.gov and copy roxane.bernard@dpi.nc.gov.

24. Q: *Do the funds have to be encumbered by June 30, 2020? What is the liquidation time for the grant?*

A: No. The funds must be encumbered by September 30, 2021 and liquidated by December 30, 2021.

25. Q: *Do federal procurement guidelines apply for mobile computing devices/hotspots purchased through PRC 163?*

A: Yes. All federal procurement guidelines apply to this PRC.

26. Q: *Are indirect costs optional as with Title I-A?*

A: Yes.

27. Q: *Can we have unbudgeted funds that will be planned for in 2020-2021?*

A: Yes.

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ALLOWABLE USES OF FUNDS

28. Q: *Is it permissible to set part of these funds for compensatory services for EC students?*

A: Yes, if the appropriate budget codes are listed in the chart of account and it is indicated as a need in the LEA's application for ESSER funds.

29. Q: *Can we purchase software programs like Canvas, Blackboard, etc., to enhance instruction virtually?*

A: Computer software is an allowable expenditure if it is identified as a need in the LEA's application for ESSER funds. During planning, check the chart of accounts for the needed codes and contact your DPI program administrator if the codes are not listed.

30. Q: *Can ESSER funds be used for salaries?*

A: Salaries are allowable expenses. However, we recommend districts consider the sustainability of the position as these are time-limited funds.

31. Q: *With the possibility of not being able to open up a cafeteria for a while, can these funds be used to purchase supplies and equipment for our school nutrition program to safely provide meals to classrooms?*

A: Yes. If equipment is needed due to processes being changed due to COVID-19, then it would be an allowable under PRC 163.

32. Q: *Could districts use this funding to support their migrant families (if they have a large population) in the purchase of mobile hotspots for rural areas or getting internet service in labor camps or for PPE for families/youth living in labor camps.*

A: Yes, if it is identified as a need in the LEA's application for ESSER funds. During planning, check the chart of accounts for the needed codes and contact your DPI program administrator if the codes are not listed.

33. Q: *Could these funds be used for "hotspots" to ensure access for students who do not have Internet service?*

A: Yes, if this is identified as a need in the LEA's application for ESSER funds. During planning, check the chart of accounts for the needed codes and contact your DPI program administrator if the codes are not listed.

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EQUITABLE SERVICES

NOTE: Please see the CARES Act Equitable Services Memo that was included in the 5/15/20 email to districts from Federal Program Monitoring and Support.

34. Q: *How do I calculate proportional share for equitable services if I don't know who is participating?*

A: You will not be able to complete a precise calculation until you have completed the consultations. Meanwhile, you could estimate the number of K-12 students at schools that will participate and generate an estimate proportionate share. Your application for CARES funds may be turned in prior to the completion of the consultations.

35. Q: *How do you determine the administrative costs for the private schools?*

A: Direct administrative costs are capped at 2%, and the indirect costs are based on a percentage determined at the district level. The sum of these two values could be used as the administrative costs during the consultation (and entered in the proportionate share calculator). For actual direct administrative costs incurred during implementation of the services, the district could consider how much of the administrators' time has been used for the outreach, consultation and implementation for equitable services. Those hours could be multiplied by an effective hourly rate based on the administrators' salaries. Travel costs for administrators related to equitable services can be determined per each occurrence. These direct administrative costs should be cost-allocated to site code 860. The indirect costs are automatically calculated and coded by the budget system and can't be placed at site 860. Instead, districts will need to keep up with how much of its indirect costs are associated with equitable services. The administrative costs in site code 860 would be short of the true equitable services cost by that amount, and the district should be prepared to report this difference to DPI upon request. The method for determining administrative costs should be explained to the private schools during consultation.

36. Q: *Are services made available to all private schools in our district or only the ones that partnered with us for the 2019-20 school year?*

A: All private schools in the district must be notified of the availability of equitable services. Prior acceptance or refusal of any other equitable services has no bearing on this.

37. Q: *As a charter school, are we required to also consult with private schools for the proposed funding?*

A: No. Charter schools in North Carolina are not required to offer equitable services.

38. Q: *Will a subgrant template be available for us to give to the private schools?*

A: DPI has not created any documents for private schools to complete, other than the *Affirmation of Notification, Invitation and Consultation for Equitable Services*.

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39. Q: *If private schools request technology (computers, hotspots, etc.), non-consumable materials under equitable services, how long do they keep the items since the items remaining property of the LEA? Also, since the property of the LEA, can the LEA restrict the type and brand of the computer provided to the school?*

A: The devices are property of the district and are to be used in the district's implementation of ESSER equitable services. When the district's implementation of the services ends, the devices remain district property to be used in a manner determined by the district.

40. Q: *If we have consulted with all private schools in the district for Title I, and they have opted to not participate in Title I, do we have to conduct a second attempt at consultation with all of the schools? Or is their denial to consult complete?*

A: Title I (ESSA) and the ESSER funds grant (CARES Act) each includes equitable share provisions. Whether or not a private school has consulted for Title I and whether or not they have participated in Title I have no bearing on the district's obligation to perform the required outreach for ESSER funds under the CARES Act.

41. Q: *If we don't have any private schools in our district, do we still check the assurance box regarding equitable services? What if we have private schools but none of them accepted services?*

A: Yes, check the box in all cases. If there are no private schools in the district or if you are a charter or LAB school, read that statement on the application as if it says, "if applicable." If there are private schools in the district but none of them accepts the invitation to consult, the district is complying with the law by providing the notification and invitation. If private schools consult but decline services, the district is complying by providing consultation. For each private school in the district, even the ones that do not consult and do not accept services, the district is required to complete an *Affirmation of Notification, Invitation and Consultation* form that was provided in the May 15 email from Federal Program Monitoring and Support.

42. Q: *Do the private schools have to disclose their poverty data in order to receive these funds?*

A: No. The US Department of Education issued guidance on April 30, 2020 indicating that equitable share is to be determined based on total enrollment, not on low-income numbers.

43. Q: *Are private school equitable shares based on their total enrollment percentage or just on what they indicate as their needs?*

A: The amount of funds available for equitable services is based on the calculation that is explained in the Proportionate Share Calculator for CARES Act that was emailed to federal program directors from their DPI Program Administrator on or around May 19.

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44. Q: Will we need to do Affirmation Forms for the CARES Funds and again for the Title IA for FY21? Do the forms need to be uploaded with the application?

A: The equitable share Affirmation form for CARES-ESSER will only need to be done once, with a deadline of August 31, 2020. The requirements for Title I-A and the other grants under ESSA are independent of CARES Act and must still be completed each year.

45. Q: Are homeschools considered private schools?

A: No. Homeschools are not considered private schools in North Carolina.

46. Q: How long does the private school keep the devices- does it ever return them to the LEA?

A: The devices are property of the district and are used in the district's implementation of ESSER equitable services. When the district's implementation of the services ends, the device remains district property and must continue to be managed in accordance with district policies. How the devices are used is to be determined by the district.

47. Q: Some usage licenses are for the LEA; how does that allow us to install on the devices for the private schools?

A: Devices purchased for use by private schools belong to the LEA. If there are not enough licenses, the funds for equitable services can be used to purchase additional ones for those devices.

48. Q: As a charter school, are we required to also consult with private schools for the proposed funding?

A: No. Charter schools are not required to consult with private schools.

49. Q: Is there a new form for consultation with private schools for this grant? Is there a form for denial to consult like Title I?

A: Yes. There is an *Affirmation of Notification, Invitation and Consultation for Equitable Services* form specific to this grant.

50. Q: For the estimated 860 set aside, what purpose/obj code is suggested?

A: The codes would reflect what the district expects is likely to be the type of funding needed. However, it really would not be expected that the district knows what codes will apply.

51. Q: Do we need to submit a form saying there are no private schools within our district?

A: At this time, there is no need for you to stipulate that in your application. DPI will follow up with school districts at a later date to request files related to equitable services. District that have no private in the Directory will not be asked for any such files.

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52. Q: Is there a handout with talking points for the equitable services for the private schools on ESSER that can be shared with us?

A: DPI has not created a handout for use by all districts. However, there some guidance is accessible via the May 15 email from Federal Programs Monitoring and Support. Attached to that email are a memo regarding equitable services and a *Summary of Topics and Statement of Assurances for CARES Act Equitable Services*. In addition, private school staff should be guided though the same type of identification of needs and strategies that the district conducted to complete its application for CARES Act funding.

53. Q: Do we upload the additional form?

A: Unlike the requirements for the consolidated grants, there are no equitable service documents to upload in CCIP for CARES Act-ESSER. Districts must maintain all documents in their files and make them available to DPI upon request at a future date.

54. Q: In the private school proportionate share, can monies be spent on funded strategies for private schools that are different strategies than those of the LEA?

A: Yes. The needs at the private school might be different from the needs at the public schools. The services are equitable in that the funding to support them is based on the same types of student counts at both the public and private schools.

55. Q: If a private school opts in and wishes to purchase devices that our district does not support would the cost of maintenance support need to be included in the 860 budgets. Would the private school portion also need to cover insurance for the devices?

A: If there are additional costs associated with selecting particular devices, those costs will be taken from the equitable share. If district policy is to require insurance for devices used in the public schools, then a similar requirement may be made for the devices

56. Q: If private schools ask for devices, are they to be used year after year, or just this year?

A: The devices are property of the district and are to be used in the district's implementation of ESSER equitable services. When the district's implementation of the services ends, the devices remain district property to be used in a manner determined by the district.

57. Q: Does the 2% direct administrative cap also include any administration tied to the administration of equitable services to private schools or separate from that?

A: The direct administrative costs of equitable services is included in the amount that is capped at 2%.

58. Q: Based on the calculator you sent us - How do we determine the reasonable and necessary administrative cost for private schools?

A: The district may document the number of hours its administrators devote to planning and implementing equitable services. These hours may be multiplied by hourly rates based on the administrators' salaries. Other administrative costs can be pro-rated between district and private schools, based on any relevant measure such as numbers of participating students or teachers or

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relative magnitude of a project. The resulting amounts for equitable share must be cost-allocated to the 860 site code.

59. Q: If devices are purchased through equitable services, are they restricted for use with only non-secular material?

A: Devices used for equitable services should be subject to the same user agreements and expectations that apply to similar devices used for district programs. The activities and materials accessed with the devices in conjunction with the agreed-upon equitable services must be secular, neutral and non-ideological.

60. Q: If a private school wants to extend the hours/days for their custodial staff or for any other staff member, how would we do that? Contracted services or blended funds?

A: Districts may never pay salaries of private school staff. If the district sees a need to hire an individual as a district employee, that would be allowable. Or, the district may contract with an individual to provide specified services. In either case, if the individual is also an employee of the private school, they must be working under the supervision of the district during the time for which they are being paid with federal funds. They may not be paid for time during which they are simultaneously being supervised or paid by the private school. District staff supervising the individual would not need to be on site at all times, any more than would be required if the individual worked at a district school. For any such expenditures, the district must adhere to all of its regular policies regarding hiring and contracting.