



COFFEE AND CONVERSATION: CFP & ESSER I

18 FEBRUARY 2021

- CFP/ESSER I compare and contrast
- ESSER uses of data quality/grants management
- Planning for post-ESSER sustainability (“The Fiscal Cliff”)
- Carryover of Title IA funds
- Questions and Answers

HOSTS

Education Quality

- Josh Souliere, Assistant Division Director
- Toni Marra, Education Quality Coordinator
- Patrick Halladay, Division Director

Federal Education and Support Programs

- Jesse Roy, Assistant Division Director
- Kristine Seipel, State Title I Director
- Karen Abbott, CFP Grants Manager
- Megan Kinlock, State Title II Director
- Katy Preston, State Title IV Director
- Anne Bordonaro, Division Director

Finance

- Jill Briggs-Campbell, COVID-19 Federal Emergency Funds Manager
- Abby Houle, School Finance Analyst
- John Leu, Finance Director
- Bob Coathup, Finance Analyst I
- Cassandra Ryan, Director of Regulatory Compliance and Risk Management

TEAMS

- Conversation
- Raise Hand
- Closed Captioning
- patrick.halladay@vermont.gov

CFP/ESSER I COMPARE AND CONTRAST

Question	FY21 CFP	ESSER I
Application/amendment deadline?	9 April 2021	20 March 2021
Period of availability of funds?	1 July 2020-30 June 2021	13 March 2020-30 September 2022
Deadline to obligate funds?	30 June 2021	30 September 2022
Supplement not Supplant Applicable?	Yes	No
Admin. cap (including indirects)?	10% (Title IA & IIA); 2% (Title III & IVA)	10%
Restrictiveness of allowable uses?	More restrictive than ESSER	Less restrictive than Title (includes all activities allowed under ESSA, in addition to many others)
Restrictions on which schools may be served	Yes (ex. Title I Targeting & Ranking required)	No, all schools and students may be served, and LEA may use funds for LEA-wide activities and purchases or target particular schools or students.

ESSER USES OF DATA QUALITY/GRANTS MANAGEMENT

- Provide data collection, progress monitoring, and data analysis training
- Purchase tech infrastructure to improve data collection and quality
- Hire grants or data manager
- Allowed, as long as LEA ties to COVID response, including learning loss.
(Uses #'s 5, 7, 10)

PLANNING FOR POST-ESSER SUSTAINABILITY (“THE FISCAL CLIFF”)

Mostly, moving cost from ESSER to other federal source is fine

1. Typically (e.g., Titles IA, IIA, and IVA), supplanting occurs when LEA uses federal funds to replace state and local, as opposed to federal to federal. As ESSER is federal, moving to another federal is not supplanting concern.
 - Cost must be allowable under the new program
2. For programs prohibiting supplanting other federal funds (e.g., Title IIIA, 21C), ED usually allows if previous program ends.
 - Nothing to “supplant” if original funding source ends

CARRYOVER OF TITLE IA FUNDS

- Local carryover limited to 15% previous year allocation
- LEAs can apply to AOE for waiver to limit once every three years
- Ed Flex authority allows AOE to waive limit second time in three-year period
- VT received waiver allowing all LEAs relief from 15% limit in FY21
- LEAs with more than 15% carryover of FY20 Title I allocation can apply to keep all funds
 - CFP Team will contact LEA if waiver needed
 - LEA report Q1 Title I expenditures to AOE for determination
- New waiver still counts toward total waivers allowed in three-year period
- LEAs develop plans and procedures for spending funds to limit future carryover
- Funds carried forward must be spent down before new funds can be applied
 - Excess carryforward in one year contributes to excess carryforward following year

Questions and Answers

FUNDING FOR GRANTS ADMINISTRATION

	CFP Funds	ESSER Funds
Administration Caps	Title I, Title II – 10% Title III, IV, V – 2%--Includes direct and indirect administration	10%--Includes direct and indirect administration
Direct Administration Allowable Activities	<p>Oversight of the Grant</p> <ul style="list-style-type: none"> • Research and development of application • Needs assessments and SWP planning as connected to federal funds • Meeting assurances • Overseeing the implementation of investments (e.g., organizing PL, supplies, family engagement) • Supervision of staff paid for with funds • Evaluation of grant investments • Consolidated administration for CFP Team Leader, audit, and bookkeeping that can be directly attributed to grant activities • Conference attendance directly related to CFP work <p>Single Audit Services: Must be allocable to grant</p> <p>Bookkeeping: Time spent on activities directly attributed to grant</p>	<p>Oversight of the Grant</p> <ul style="list-style-type: none"> • Research and development of grant application • Work on needs assessments • Overseeing implementation (e.g., organizing PL, supplies, family engagement) • Supervision of staff paid for with funds • Evaluation of grant investments <p>Single Audit Services: Must be allocable to grant</p> <p>Bookkeeping: Time spent on activities directly attributed to grant</p>
Indirect Administration	Funds are earned on funds spent with an approved rate	Funds are earned on funds spent with an approved rate

EXTENDED YEAR/SUMMER PROGRAMMING

- **Title I, Part A***

- Allowable for academic instruction, tutoring, and intervention

- **Title IV, Part A***

- Allowable to support well-rounded educational opportunities, improving conditions for student learning, and/or effective use of technology in the classroom

- **ESSER I**

- Supporting technology, sanitation supplies/PD, mental health, extended learning, maintenance of operations and employment, planning long-term closures, vulnerable populations, coordinating with governments, resources for leadership, preparedness/response efforts, any Title activities
- Expenses may include, but are not limited to supplies, salaries, contracted services, etc.
- Single grant application

* Expenses may include, but are not limited to, salaries & benefits (BCO), contracted services, supplies, etc. Potentially both FY21 and FY22 CFP grant applications

ALLOWABLE SPENDING FOR TECHNOLOGY

- **Title I**
 - Targeted Assistance: Students most at-risk of not meeting state academic standards **SnS applies***
 - Schoolwide: All students in meeting academic standards, particularly those most at-risk **SnS applies***
- **Title II:** Supplemental activities that strengthen the quality/effectiveness of educators (e.g., professional development, evaluations) **SnS applies****
- **Title III:** English learners in attaining English proficiency and academic achievement **SnS applies****
- **Title IV:** LEAs or schools providing well-rounded educational opportunities, learning/improving of student social, emotional, and physical health and use of technology **SnS applies****
- **ESSER:** Broad allowability for needs brought on by Covid-19, purchase of technology, activities authorized under ESEA and “other activities necessary to maintain LEA operations [and] services” **SnS does not apply**

**With some exceptions, LEAs are required to develop and employ a documented Title I-Neutral Budgeting Methodology to meet Title I SnS requirements before spending.*

***Funds may not be used for local/state/federal required activities or to fund activities in place of local/state funds used for the same purposes in the past year.*

ALLOWABLE MENTAL HEALTH, REENGAGEMENT, ACADEMIC LOSS

■ Title I

- Targeted Assistance: LEAs must illustrate correlation between mental health/disengagement and achievement of students at-risk of not meeting state academic standards, using local findings
- Schoolwide: LEAs must illustrate correlation between mental health/disengagement and achievement of all students in meeting academic standards, particularly those most at-risk, using local findings

- **Title II:** Supplemental activities that strengthen the quality/effectiveness of educators (e.g., professional development, evaluations) in supporting achievement. LEAs must illustrate correlation between addressing mental health/disengagement and achievement of students, using local findings.

- **Title III:** English learners in attaining English proficiency and academic achievement and promoting involvement of their families/communities. LEA must illustrate correlation between mental health/disengagement and English acquisition, achievement, or engagement of families/communities, using local findings.

- **Title IV:** LEAs or schools providing well-rounded educational opportunities, **learning/improving of student social, emotional, and physical health** and use of technology

- **ESSER:** Broad allowability for needs brought about by Covid-19, including mental health supports; meeting needs of historically marginalized students; summer, extended, and afterschool; all activities authorized under ESEA.

Previous described SnS requirements apply.

INDOOR AIR QUALITY

- \$15M Coronavirus Relief Fund (CRF) approved to extend Indoor Air Quality grant through 12.30.2021
 - Efficiency Vermont
- ESSER allows HVAC costs
 - Partner with Efficiency Vermont and AOE to determine whether cost belongs to IAQ or ESSER
- “As is the case with all activities charged to the ESSER...funds, construction costs must be reasonable and necessary to meet the overall purpose of the program, which is *“to prevent, prepare for, and respond to” the COVID-19 pandemic.*” – US Department of Education

CHANGES AND UPGRADES TO SCHOOL FACILITIES

- “...construction costs must be *reasonable and necessary* to meet the overall purpose of the program, which is “*to prevent, prepare for, and respond to*” the COVID-19 pandemic... Therefore, any construction activities, including renovations or remodeling, that would be necessary for an LEA to prevent, prepare for, and respond to COVID-19 would be permissible... subject to prior written approval by its SEA.”
- “Approved construction projects must comply with applicable Uniform Guidance requirements, as well as the Department’s regulations regarding construction at 34 CFR § 76.600... and must meet all Davis- Bacon prevailing wage requirements...”
- Examples include renovations that:
 - permit an LEA to clean effectively (e.g., replacing carpet with easily-cleanable tile)
 - sustain social distancing (e.g., bringing unused wing school into fire/safety compliance to create more space)

ESSER I EQUITABLE SERVICES

- Non-profit, approved/recognized independent schools are eligible for equitable participation in ESSER I funds.
- LEA responsible for outreach to independent schools (within and outside boundaries) before applying
- Same method for determining amounts as Title I:
 - Students enrolled in independent schools who reside in LEA attendance AND are low-income
 - Includes independent schools outside LEA's boundaries—equitable participation funds “follow” students
 - Application performs calculation based on number of qualifying students
 - Numbers of students and schools needs to be within allowable uses of ESSER
- LEA may choose, through consultation with independent, to reimburse expenses beginning 3.13.2020. Expenses still appear in LEA application.
- Otherwise, all funds should remain in LEA control.

WHO DO I CONTACT IF I HAVE A QUESTION ABOUT...

- ESSER Allowable Costs or Programmatic Questions: [Josh Souliere](#)
- ESSER Equitable Services: [Jesse Roy](#)
- ESSER GMS or Accounting: [John Leu](#) or AOE.GMSHelp@vermont.gov
- Title I: [Kristine Seipel](#)
- Title II: [Megan Kinlock](#)
- Title IV: [Katy Preston](#)
- ESSER or CFP Fiscal and Regulatory: [Cassandra Ryan](#), [Bob Coathup](#), [Abby Houle](#)