



# CARES Act Funding Resources

## Draft FAQ

### CARES ACT USE OF FUNDS FAQs 7.23.2020 DRAFT\*

These questions were generated from the 7.23.2020 CARES Act webinar on the ESSER LMS fund and the Idaho Rebounds Coronavirus Relief, Distance/Blended Learning fund.

*\*The information in this document reflects what we know currently. We will communicate up-to-date information as we learn more.*

The three criteria for the Coronavirus Relief Funds include:

1. The expenditure is necessary and was incurred due to the public health emergency with respect to the Coronavirus Disease 2019 (COVID-19).
2. The expenditure is not accounted for in the LEA's budget most recently approved as of March 27, 2020 (the date of enactment of the CARES Act).
3. The expenditure incurred during the period that begins on March 1, 2020 and ends on December 30, 2020.

**Q1. I was told the relief funds will be based on a request and approval prior to acceptance? Is this correct?**

- A. There are currently three separate funding sources from the Coronavirus Relief Funds. The Distance/Blended Learning (\$30 M) funds requires an application to be completed, signed and submitted. This application is available at <https://www.sde.idaho.gov/federal-programs/cares-act/index.html> All applications will be reviewed by a committee. As the committee finishes each LEA application review, Federal Programs will upload the LEA's allocation into the GRA. Expenditure requests will go through the GRA process, which includes a Reimbursement Template that will be reviewed by the State Controller's Office (SCO) for final approval.

**Q2. Will you be discussing the Non-ESSERF funds that a few [LEAs] received and requirements?**

- A. A webinar for the Non-ESSERF allocations was conducted on July 23. The webinar was recorded and the archived webinar is available at [link to access a recording of the webinar](#). The archived webinar will also be available on [the Federal Programs CARES Act](#)

[webpage](#). On 7.24.2020, the PowerPoint and FAQs from the live webinar were emailed to registrants.

**Q3. For the equitable services piece of the ESSER funds, does the same methodology for allocation apply to the non-public schools? Set-up fee, PD and per student? Or is it just a per student allocation based on enrollment? What enrollment date should be used? The methodology has three steps, do we follow all three or just enrollment if it is determined the non-public needs a LMS?**

- A. For the equitable services portion of the ESSER funds, the enrollment for the school as of March should be used. LEAs will want to check with the private school to determine if they have a need for an LMS or training related to using on LMS. If so then the LEA will determine the amount of funding available from this allocation for equitable services to determine if there is enough available to meet the needs. The other ESSER equitable services funding could be used for this as well. Just a reminder that equitable services does not apply to the Coronavirus Relief Funds.

**Q4. Can we use the [Coronavirus Relief Distance/Blended Learning] funds for a fully online option being offered to families?**

- A. See the three criteria listed at the top of this page. Would any of these expenditures have been approved in the LEA's budget as of March 27, 2020? If so, then no. The State Controller's Office (SCO) states that a cost was not accounted for in the most recently approved budget if the cost is for a substantially different use from any expected use of funds. SCO has determined that "a public function does not become a 'substantially different use' merely because it is provided from a different location or through a different manner. For example, although developing online instruction capabilities may be a substantially different use of funds, online instruction itself is not a substantially different use of public funds than classroom instruction."

**Q5. Could I use the funds to pay a stipend for teachers to attend PD on blended learning?**

- A. It's possible the Distance/Blended Learning funds could be used to pay a professional development stipend if the learning occurred outside of the teachers' contract time. The State Controller's Office will have final approval on all Coronavirus Relief Fund expenditures. Guidance from the Department of Financial Management (DFM) states that only hazard pay and overtime pay may be considered for reimbursement. Consider also using ESSER flow through funds for this purpose if the professional development occurred outside of the teachers' contract time. Any activity authorized by the ESEA is allowable under ESSERF.

**Q6. We would like to use Coronavirus Relief Funds Distance/Blended Learning to pay \$100 stipend to the teachers who are willing to keep and fully educate a student who will be fully online and not coming into the building first semester. This stipend would help pay for the additional workload that comes with teaching both face-to-face and online students at the same time.**

- A. It's possible the Distance/Blended Learning funds could be used to pay a stipend if the worked occurred outside of the teachers' contract time. The State Controller's Office will have final approval on all Coronavirus Relief Fund expenditures. Guidance from the Department of Financial Management (DFM) states that only hazard pay and overtime pay may be considered for reimbursement. Consider also using ESSER flow through funds for this purpose if the work occurred outside of the teachers' contract time. Any activity authorized by the ESEA is allowable under ESSERF.

**Q7. Can you elaborate more on "infrastructure for staff" what this includes?**

- A. Infrastructure for staff includes devices and connectivity for staff.

**Q8. If/when our district has to go online can any of these funds be used for elective classes like woodshop, art, or music? Some of these type course will require hands on materials to purchase and send home like art and woodshop kits. Our teachers would work through a blended model of online instruction with students using supplies at home.**

- A. Distance/Blended Learning funds may not be used to buy supplies for online hands-on instruction. It stands to reason that the costs for these supplies were already taken into consideration when establishing a lesson plan and a budget. Expenditures must not be accounted for in the LEA's budget most recently approved as of March 27, 2020 and must be related to COVID-19. Consider using ESSER flow through funds to cover these expenditures.

**Q9. Can this be used for internet service at the home of a teacher or student?**

- A. The Distance/Blended Learning Coronavirus Relief Funds may be used for internet service at home for students and staff. Other CARES Act funding sources may also be used for connectivity. Consider ESSER flow through funds, Coronavirus Relief Funds for Technology (only 60 LEAs have these funds) or Coronavirus Relief Funds for Non-ESSERF (only 53 LEAs have these funds).

**Q10. Can you please email everyone on this call the PowerPoint deck that is being presented? Can we get this slide show? Please link this recording to the FAQ that will be sent out on Monday or please say again where this will be posted.**

- A. The PowerPoint with notes and the archived webinar are being posted on the new [CARES Act website](#).

**Q11. Idaho Rebound Coronavirus Relief Funds must be used by Dec 30 2020. If we hire a teacher for online learning delivery, can we only hire them through Dec 30 or is it obligated if the contract is for the year?**

- A. If the obligation is for salaries and benefits of the subgrantee's employee, the obligation is made when the services are performed. This means that, for example, if the teacher performs the service after December 30 (after the end of the performance period), these funds cannot be used to cover payroll related to this teacher. However, you could fund the remaining months on the contract through ESSER flow through allocations. (Note: The type of expense determines when an obligation is made.) Guidance from the Department of Financial Management (DFM) states that only hazard pay and overtime pay may be considered for reimbursement for expenditures not in the approved budget as of March 27, 2020.

**Q12. If our District uses Google Classroom we would not need funds to purchase Google Classroom as an LMS, however our staff would need additional PD. Is that an appropriate use of the Non-ESSERF? Is the LMS checklist on the SDE website now? If not, when do you anticipate that list being posted? (And same question for the LMS approved vendor list.)**

- A. Professional development related to implementing online or blended learning is appropriate for the ESSERF LMS Funds, the CRF, Distance/Blended Learning Funds and the ESSER Flow through Funds. The District LMS Checklist is available at the CARES Act webpage and is required to be submitted in the GRA IF the LEA is requesting reimbursement for a current LMS. The LMS approved vendor list is expected to be posted by the end of the first week of August.

**Q13. Headphones needed for at home students to help with distractive noise. Can we use these funds for those headphones?**

- A. Yes, Distance/Blended Learning funds may be used to purchase materials related to online learning delivery. ESSER flow through funds would also be an appropriate funding source.

**Q14. We need to hire an extra 1/2 time custodian to keep up with in school sanitation for those who choose to attend school. Is that allowable?**

- A. This is not an allowable expense for the Distance/Blended Learning funds. Consider using ESSER flow through funds for this purpose.

**Q15. Can we pay for their IDLA classes online if they don't choose the Google live being used in real time with their teacher/classes at the school? Can it be used to pay for IDLA \$75 per student distance learning for full semester for students who stay home due to COVID-19?**

- A. In an online/virtual school setting, our understanding is that such student online fees are related to the expenditures of running an online school. In other words, online students who have participated in online instruction BEFORE Covid-19, have not had an interruption of their learning experience due to the pandemic, and therefore Coronavirus Relief Funds could not be used for these classes. Consider using ESSER flow through funds for the \$75 class fee for students who attend a brick and mortar school, but need an online/distance learning environment because of COVID-19. It does not appear that Distance/Blended Learning funds can be used to purchase content.

**Q16. What does it mean to be COVID related? Is everyone on the same page on that definition?**

- A. In general, the CARES Act Fund was created "to prevent, prepare for, and respond to coronavirus."

**Q17. To clarify, is Infrastructure specific to Technology? Or can it be used for any furniture/facility necessities to adhere to any safety guidelines?**

- A. Infrastructure for the Distance/Blended Learning CRF grant is specific to technology. Consider the ESSER flow through grant for other infrastructure needs related to COVID-19.

**Q18. In regards to the Coronavirus Relief Funds you said that the "the expenditure is not accounted for in the LEA's budget most recently approved as of March 27, 2020". Does this mean last years (2019-2020) budget? Our school board did not approve our current (2020-2021) budget until last month, in June. Thoughts?**

- A. In this case, it would mean last year's (2019-2020) budget. The most recently approved budget would be the budget in place as of March 27, 2020.

**Q19. It sounds like there is significant interest in using the funds for salaries. Can I unmute and talk about our plan as an example? I think that would help people understand what is and what isn't allowable.**

- A. Please send your specific salary examples to Karen Seay at [kseay@sde.idaho.gov](mailto:kseay@sde.idaho.gov). We will research and follow-up.

**Q20. If we purchase software licenses are they prorated until December 31st or can they be reimbursed for a one-year subscription?**

- A. The performance period for the Coronavirus Relief Funds ends December 30, 2020. If the license is purchased by December 30<sup>th</sup>, the expenditure should be allowable.

**Q21. Our LMS contract was put in place FY20 and is a 3 year agreement with a cancellation clause pending funding. Can the FY 21 annual payment be made from the ESSER LMS set aside funds?**

- A. Yes, as long as the LEA's current LMS meets the technical and functional criteria determined by the digital divide committee. This document is available on [the CARES Act webpage](#) and is called District LMS Assurance Checklist. Complete the District LMS Assurance Checklist and attach it to the GRA drawdown request.

**Q22. When will the RFP Award list be available?**

- A. The Request for Proposals applications closes July 27th. The ISDE is hoping to have a vendor list available by the end of the first week in August.

**Q23. Our county was given funds we can apply for some excesses in spending due to COVID going back to March 1. That may be a resource for some of the extra staffing funding. All counties received those funds.**

- A. Thank you for this reminder!

**Q24. Could we purchase a multi-year software subscription?**

- A. We are researching this for the Coronavirus Relief, Distance/Blended Learning Funds. Consider using ESSER flow through funds for this expenditure. ESSERF has a performance period until September 30, 2022 and software is an allowable activity.

**Q25. Can you point me to where I can find the LMS checklist on the SDE website? I am looking for the LMS checklist as well. Can't find it.**

- A. This document is available at [the CARES Act webpage](#) and is called District LMS Assurance Checklist. I found [the checklist here](#).

**Q26. Is there rationale for the window on this spending ending in December? I don't think anyone thinks the pandemic will be over by December. Is there a chance or discussion around the deadline being extended?**

- A. Congress identified the performance period for these funds (Coronavirus Relief Funds, Title VI Sec.601(d)). We can only speculate that it was their intention that these funds would be used for the most immediate needs related to COVID-19. We have not heard any conversations around extending this deadline, but if we do, we will immediately communicate the information to LEAs.

**Q27. As I understand, the IRC funds can be used to support:**

- **devices (laptops, cameras, mics etc) to support students and teachers.**
- **connectivity (does this include fees for internet service plan upgrades, access points, switches, servers etc)**
- **infrastructure for staff (is this IT hardware or is it something that includes the cameras, mics, stands etc for teachers?)**
- **PD. I assume this PD would have to be directly related to digital or blended learning.**

- A. Devices include laptops, Chromebooks, etc. These usually come with microphones and cameras, so if the LEA wanted to be reimbursed for these, then more information would be needed. The State Controller's Office will have final approval. We are researching your connectivity question. Infrastructure for staff includes devices and connectivity. Professional development related to LMS/distance/blended learning is allowable with the use of these funds.

**Q28. I am new and am wondering how the funding works? Do we commit the funds and ask for reimbursement or do we send our proposed purchases, get approval and then order?**

- A. Some CARES Act funds require an application and others don't. The Coronavirus Relief Funds Distance/Blended Learning funds do require an application which will be reviewed by a committee. Part of the application includes a budget for the list of allowable activities. The application may be found at [the CARES Act webpage](#). All state expenditures are reimbursed to LEAs through the [Grant Reimbursement Application \(GRA\)](#). The State Controller's Office will have final approval on all Coronavirus Relief Fund expenditures.

**Q29. We would like to use Idaho Rebounds Coronavirus Relief, Distance/Blended Learning funds to pay for educational assistants to work in the classroom to specifically help with the distance learning aspect of technology set-up such as Google Meets, Edmodo, answer distance learner questions, and manage the large amount of extra work for the teacher that**

**having students in person daily, teaching those that are only out for a short period due to COVID related issues via Google Meets/Edmodo and teaching those who are out the entire semester through Google Meets/Edmodo. These are totally unexpected needs as a result of COVID-19 and are not in our approved budget as of March 27, 2020. Will the Idaho Rebounds Coronavirus Relief Funds for Online/Blended learning cover staffing? For instance, we are planning on opening school and offering an at home learning option. Rather than our teachers having to do two jobs, can we hire someone to handle the remote teaching?**

- A. Idaho Rebounds Coronavirus Relief, Distance/Blended Learning funds may be used for salaries and benefits for hazard pay (defined as work involving physical hardship related to COVID-19) and overtime pay (above and beyond contract pay not already budgeted). Payroll expenses for employees whose services are “substantially dedicated to mitigating or responding to the COVID-19” may be covered. For example, payroll and benefit costs associated with public employees who could have been furloughed or otherwise laid off but who were instead repurposed to perform previously unbudgeted functions substantially dedicated to mitigating or responding to the COVID-19 public health emergency may be covered. This could include expenditures for payroll and benefit costs of educational support staff or faculty responsible for developing online learning capabilities necessary to continue educational instruction in response to COVID-19-related school closures. A cost was not accounted for in the most recently approved budget if the cost is for a substantially different use from any expected use of funds. The State Controller’s Office position is that “a public function does not become a ‘substantially different use’ merely because it is provided from a different location or through a different manner. For example, although developing online instruction capabilities may be a substantially different use of funds, online instruction itself is not a substantially different use of public funds than classroom instruction.” The SCO has final approval for all Coronavirus Relief Fund expenditures. Consider using ESSER flow through funds for staffing expenditures specifically related to COVID-19.

---

### **For Questions Contact**

Federal Programs Department  
Idaho State Department of Education  
650 W State Street, Boise, ID 83702  
208 332 6800 | [www.sde.idaho.gov](http://www.sde.idaho.gov)