



## **Federal Stimulus Funding Frequently Asked Questions**

This document is a list of frequently asked questions (FAQs) regarding the three Elementary and Secondary School Emergency Relief Fund (ESSER or ESSERF) grant programs authorized by the three federal stimulus relief packages: Coronavirus Aid, Relief, and Economic Security Act (CARES Act); the Coronavirus Response and Relief Supplemental Appropriations Act (CRRSAA); and the American Rescue Plan Act (ARPA). It also includes information regarding the Governor's Emergency Education Relief Fund (GEER or GEERF) grant program authorized under the CARES Act.

LEAs should check this FAQ frequently as it will be continually updated as more guidance is available. The information in this document includes existing statutes, regulations, and program guidance available to the Wisconsin Department of Public Instruction. Each FAQ includes the date it was posted by DPI.

If you have additional ESSER questions (for all three acts), please send them to [essergrants@dpi.wi.gov](mailto:essergrants@dpi.wi.gov).

If you have additional GEER questions under the CARES Act, please send them to [geergrants@dpi.wi.gov](mailto:geergrants@dpi.wi.gov).

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### **General Questions**

1. **Since ESSER funds from all three relief packages go to LEAs using the Title I funding formula, does that mean Title I regulations must be followed?**

ESSER funding is not Title I funding and is much more flexible than Title I. However, for the funds received under the CARES Act, LEAs must provide equitable services in the same way they do under ESEA Title I, Part A (CARES Act, Section 18005). Refer to this [guidance document on CARES Act equitable participation](#) for more information. CRRSAA and ARPA do not require LEAs to provide equitable services. CRRSAA and ARPA require DPI to provide equitable services to private schools.

*Updated 3/20/2021*

**2. Are there reporting requirements associated with the relief funds?**

Yes. DPI will gather as much report data from applications submitted in WISEgrants as possible to reduce the reporting burden on LEAs.

*Updated 3/20/2021*

**3. Do the relief funds include a supplement, not supplant requirement?**

No, therefore funds can be used for any allowable cost under the acts, no matter how the cost was paid for in the past.

*Posted 6/9/2020*

**4. Which indirect cost recovery rate (restricted or unrestricted) can LEAs use?**

The relief funds do not include a supplement, not supplant provision and therefore utilizes LEAs will use the unrestricted indirect rate for the purposes of indirect cost recovery. There is no provision for reserving grant funds for direct administrative costs.

*Posted 7/30/2020*

**5. Do the relief funds require LEAs to follow the same “Parents Right to Know” requirements as defined in the Elementary and Secondary Education Act (ESEA) Title IV, Part A? In other words, would mental health screening or services paid for with ESSER funding require active consent from a parent/guardian?**

The relief funds do not specify this requirement and the United States Department of Education has not provided additional guidance about this topic at this time. Considerations related to consents required for school-based mental health screening or services can be found at <https://dpi.wi.gov/sspw/mental-health/mental/behavioral-health-screening>.

*Posted 9/8/2020*

**6. How do I know if my LEA received GEER Funds under the CARES Act Funds?**

159 LEAs received a GEER Grant. DPI’s webpage for GEER (<https://dpi.wi.gov/cares/governors-emergency-education-relief-geer-grant-program>) identifies which LEAs were eligible and received GEER grants. The webpage also includes the allocation amount for each LEA.

*Updated 3/20/2021*

**7. If an LEA wants to make a grant claim for the 2020-21 school year for ESSER II funds, how do they do so when the ESSER II grant appears in FY 2021-22 in WISEgrants?**

The ESSER II grant appears in the 2021-22 year in WISEgrants, but it has no bearing on when the expenses were from or when you will receive the payment. Be sure to use the report period end date to identify when the expenses are from.

*Posted 10/21/2021*

**8. Must an LEA engage stakeholders for each ESSER III budget revision?**

LEAs need to engage stakeholders as they develop their ESSER III plan and define their level of engagement when they submit their initial application. DPI encourages LEAs to engage stakeholders throughout the entire performance period for the ESSER III funding, but it is not a requirement under the American Rescue Plan Act to engage stakeholders for each ESSER III budget revision. It is critical that LEAs meaningfully engage their stakeholders and be transparent with their plans to support students, families, educators, staff, and the community. As with all other federal stimulus funds, it is best practice to have meaningful consultation with stakeholders regarding the use of federal funding.

*Posted 1/28/2022*

**9. Must the ESSER III LEA Plan be updated every six months?**

The ESSER III LEA Plan for funding does not have to be updated every six months, however it is good practice to review and update the plan as needed. Please note, this plan will update each time the LEA receives a budget approval, and the most current version must be uploaded to the LEA's website to ensure compliance with the federal regulation. The LEA's Return to In Person Instruction and Continuity of Services Plan must be reviewed and updated as necessary every six months.

*Posted 1/28/2022*

**10. Is my LEA / CESA required to accept stimulus grant(s)?**

No. Each LEA / CESA has the authority to accept or surrender the stimulus grant(s) they are eligible for.

*Posted 6/24/2022*

## Allowable Costs and School Finance

Information about specific allowable costs can be found in the [ESSER Guidance on Allowable Costs](#) or [GEER Guidance on Allowable Costs](#).

1. **Can LEAs use stimulus funds to replace revenue lost because of kids going to home schooling for one year? Can they use funds to replace lost admissions costs? Can they use funds to reimburse lost concessions for the school booster club?**

No. LEAs may not use any of the stimulus funding to replace uncollected revenue from any account (2 CFR 200.426).

*Posted 4/14/2021*

2. **Can LEAs put their stimulus funds into Fund 46?**

No. The Federal Uniform Grant Guidance (2 CFR 200.305(b)(1)) prohibits this.

*Posted 3/20/2021*

3. **Can LEAs use their stimulus funds to support its instructional programs and then put their state and local funds into Fund 46?**

No. Many federal programs have maintenance of effort requirements for LEAs. Reducing the LEAs state and local funds for instructional programs could negatively impact allocations of other federal grant programs (i.e. all the Titles under ESEA programs).

*Posted 3/20/2021*

4. **Are administrative costs (direct and indirect) allowed?**

Yes. An LEA may charge direct costs that are reasonable and necessary for the administration of the relief funds. Keep in mind that all salaries paid for with relief funds must be supported by time and effort documentation required by the Federal Uniform Grant Guidance (2 CFR 200.430). Additionally, since the funds do not have a supplement, not supplant provision, LEAs may use their unrestricted indirect rate (34 CFR 76.563).

The salary and benefits of a superintendent or district administrator cannot be charged to federal grants even if the administrator is providing support to this program (2 CFR § 200.444).

If an LEA is providing equitable services to a private school(s) under the CARES Act, LEA staff should discuss the cost for administration during the consultation process with the private school(s) before final decisions regarding services/benefits are determined.

*Posted 6/9/2020*

**5. Can LEAs use stimulus funds to support the local Families First Coronavirus Response Act (FFCRA) plan for staff?**

Yes, an LEA may use stimulus funds to support the FFCRA Plan, but only up to the cost that the LEA actually incurs.

Some employers qualify for dollar-for-dollar reimbursement through tax credits for all qualifying wages paid under the FFCRA. Qualifying wages are those paid to an employee who takes leave under the Act for a qualifying reason, up to the appropriate per diem and aggregate payment caps. Applicable tax credits also extend to amounts paid or incurred to maintain health insurance coverage. For more information, please see the Department of the Treasury's website.

The portion of salary that the tax credit covers varies depending on reason for the leave, and so LEAs may use stimulus funds to cover the employee's funded leave, rather than out-of-pocket. There is also a limit on how many weeks the tax credit covers, and if any the LEA exceeds this, the LEA may cover the overage with the stimulus funds. If an LEA did receive a tax credit for a cost paid with stimulus funds, the LEA would need to credit funding back to the federal program and should contact [essergrants@dpi.wi.gov](mailto:essergrants@dpi.wi.gov) for assistance with this process.

*Posted 3/20/2021*

**6. My LEA does not get the tax credits for FFCRA, may we use stimulus to cover the costs associated with FFCRA?**

Yes.

*Posted 3/20/2021*

**7. Can LEAs purchase Wide-Area Network (WAN) with ESSER funds?**

Yes, if WAN upgrades are meant to help the LEA increase its ability to provide access to students for learning. This might be especially true if LEAs are exploring ways to increase community area public wifi (also often called private LTE networks). These are solutions that essentially extend the LEA's network to locations outside the building(s). When an authorized user logs in, they get exactly what they get at school. It is NOT regular, commercial Internet access. It's Internet access users get within school.

*Posted 3/20/2021*

**8. What are the accounting requirements for ESSER funds?**

Information on project coding for ESSER and other federal K-12 stimulus expenditures is available from the SFS Team at: <https://dpi.wi.gov/sfs/wufar-coding-cares-act-funds>

ESSER revenues are coded using WUFAR source 730 in the same fund as the reimbursed expenditures. ESSER is unusual in that the period of performance is not tied to a fiscal year. The performance period for each ESSER program is listed below:

- ESSER I March 13, 2020 - September 30, 2022
- ESSER II March 13, 2020 - September 30, 2023
- ESSER III March 13, 2020 - September 30, 2024

LEA program staff, business officials, and auditors should work together to ensure the process and timeline for submitting budgets and claims allows the LEA to align ESSER revenues and expenditures within each fiscal year.

Again, LEAs must ensure that ESSER revenues and expenditures in the Special Education Funds (Fund 27) align within the appropriate fiscal year and project codes. DPI will not consider administrative exceptions if an LEA fails IDEA Maintenance of Effort (MOE) due to its ESSER revenues and expenditures not being aligned in Fund 27.

As a federal grant, requirements under the Uniform Grant Guidance, including requirements on purchasing, tracking, documentation, use of non-debarred vendors, and other requirements apply to ESSER funds. Federal and state requirements pertinent to ESSER funding are detailed in the certifications and assurance documents and federal subaward document in WISEgrants.

*Updated 4/8/2021*

#### **9. What are the accounting requirements for GEER funds under the CARES Act?**

GEER expenditures are coded with WUFAR project 162. GEER revenues are coded using WUFAR source 730 in the same fund as the reimbursed expenditures.

LEAs must ensure that GEER revenues and expenditures in the Special Education Funds (Fund 27) align within the appropriate fiscal year and project codes. DPI will not consider administrative exceptions if an LEA fails IDEA Maintenance of Effort (MOE) due to its GEER revenues and expenditures not being aligned in Fund 27.

As a federal grant, requirements under the Uniform Grant Guidance, including requirements on purchasing, tracking, documentation, use of non-debarred vendors, and other requirements apply to GEER funds. Federal and state requirements pertinent to GEER funding are detailed in the certifications and assurances documents and federal subaward document in WISEgrants.

*Posted 10/13/2020*

#### **10. Can relief funds be used to pay membership fees?**

No. Expenditures related to state or local teacher or faculty unions or associations are not allowed.

*Posted 6/9/2020*

**11. Can we purchase gift cards and/or other items as door prizes to incentivize students to participate in online learning?**

No. LEAs may not use federal funds to incentivize student participation. This is not allowed because it would be similar to paying students to attend class (Letter to: Anderson, U.S. Department of Education: U.S. Den 07-023021/SASA-127, January 15, 2008).

*Posted 6/9/2020*

**12. Can an LEA use relief funds for CNA training for our health aide as it would be extremely beneficial for the aide to know this information once the students return. Would this be considered an allowable cost?**

No. CNA training is not specific or limited to meeting the needs related to COVID-19.

*Posted 6/12/2020*

**13. Our LEA received approval for the Seamless Summer Option (SSO) meals program so that we could provide Grab-n-Go free meals to our students during the COVID crisis in March-May 2020. With a new program and Continuity of Pay provided to all of our support staff, our district incurred additional food service preparation expenses that we would not have if this program was not provided. Would those costs be considered Allowable Costs under ESSERF?**

Yes, these costs would be considered allowable costs under ESSERF.

*Posted 6/22/2020*

**14. If a summer school class for academic purposes is funded or supported using stimulus funds, can that academic summer school class be included as a Private School Choice Program (Choice) or Special Needs Scholarship Program (SNSP) summer school class that is part of a summer program for which the school receives state aid?**

Yes, stimulus funds, including ESSER and EANS, may be used to support Choice or SNSP summer school courses that are offered for academic purposes as part of the Choice or SNSP summer school program.

*Posted 4/8/2021*

**15. May stimulus funds be used to support pre-existing academic summer school programs?**

Yes, stimulus funds may cover costs to support summer school programming for academic purposes, either pre-existing programs offered in previous years or new programs to address learning disruption and other impacts of the COVID-19 pandemic.

*Posted 4/8/2021*

**16. If a district uses stimulus funds to support summer school programs for academic purposes, may the district count the instructional minutes for membership?**

Yes. A district may include academic instructional minutes for eligible summer and interim session courses regardless of funding source. However, a district is responsible for adherence to statutes, rules, and guidelines for eligible course offerings. It is the district's responsibility to ensure that meeting grant requirements is consistent with claiming instructional minutes for summer and interim session minutes.

*Updated 6/13/2022*

**17. May an LEA use stimulus funds to support non-academic summer programming to address social-emotional needs related to the COVID-19 pandemic?**

Yes. Providing mental health services and support is an allowed activity. Note that non-academic stipends summer programming may not be included in a school district's count of summer school minutes for membership FTE.

*Posted 4/8/2021*

**18. Are stipends for additional work that staff are conducting allowable?**

Yes, this should be documented as Hazard/Premium Pay.

*Posted 10/21/2021*

**19. What is hazard/premium pay?**

Hazard pay is additional compensation for performing hazardous duty or work involving physical hardship that in each case is directly related to COVID-19. Hazard/Premium pay is a higher pay rate. The federal guidance provides an example of using COVID-19 relief funds to cover hazard/premium pay. Staff coming in close contact with students/parents to bring students back into the classroom, would be allowed, but across-the-board hazard pay for all members of an LEA regardless of their duties would not be allowed. (2 CFR § 200.430(f))

*Updated 1/6/2022*

**20. Can we offer hazard/premium pay using federal stimulus funds?**

Yes, provided the hazard pay meets the definition and is related to an allowed purpose under the grant program.

*Updated 10/21/2021*

**21. May an LEA use ESSER and GEER funds to provide “hazard/premium pay” or other additional compensation for teachers, principals, and other school personnel, including school nutrition staff and custodians?**

Yes. Hazard/Premium pay must be reasonable and necessary and consistent with 2 CFR § 200.430(f), and given pursuant to an established plan (which could be established in response to the COVID-19 pandemic), consistent with applicable collective bargaining agreements and other relevant policies and requirements.

*Posted 10/21/2021*

**22. Can we offer targeted staff incentives or financial rewards using federal stimulus funds?**

Yes. Ensuring that students have access to the teachers and other critical staff they need to support their success by hiring additional educators and school staff and improving compensation to recruit and retain educators and school staff are allowable uses of ESSER and GEER funds. ([Frequently Asked Questions ESSER and GEER Use of Funds to Prevent, Prepare for, and Respond to the COVID-19 Pandemic, US Department of Education](#).)

The US Department of Education released additional resources to help LEAs understand allowable uses of ESSER and GEER funds:

- [Using American Rescue Plan Funds and Other Federal Resources to Address Teacher Shortages](#)
- [Using American Rescue Plan Funds and Other Federal Supports to Address Staff Shortages](#)

Also, LEAs may provide financial incentives and rewards to teachers who serve in schools identified under Title I or Title II for comprehensive or targeted support and improvement activities, for the purpose of attracting and retaining qualified and effective teachers. Therefore, this would be an allowed cost with ESSER funds. Details regarding incentive and financial rewards are available in our [“Using Title I and Title II Funds for Educator Rewards and Incentives” document](#). ([ESEA 1113\(c\)\(4\)](#))

*Updated 2/18/2022*

**23. We are having difficulty hiring bus drivers due to the pandemic. Can we offer hiring bonuses or hazard pay using federal stimulus funds?**

Yes. An LEA may use ESSER funds for recruitment and retention bonuses for current bus drivers, for salary increases, or for the cost of hiring additional bus drivers to address the shortage of bus drivers due to the pandemic. Similarly, if an LEA is operating more bus routes due to physical distancing, funds may be used to hire additional bus drivers. In addition, funds may be used to pay for the costs associated with obtaining a commercial driver’s license for new bus drivers, including the required training. An LEA may

also use ESSER funds to provide bus drivers with Hazard/Premium pay. ([Frequently Asked Questions: United States Department of Education, November 2021](#))

*Updated 1/6/2022*

**24. Can ESSER and GEER funds be used to address expanded cybersecurity and data security needs that arise due to shifts in hybrid learning?**

Yes. If a school, LEA, or State is improving cybersecurity and data security to better meet educational and other needs of students related to preventing, preparing for, or responding to COVID-19, it may use ESSER or GEER funds. For example, if an LEA needs to increase its use of technology, such as for potential temporary shifts to hybrid learning if COVID-19 cases arise, expanded cybersecurity and data security needs to facilitate that activity may also be addressed using ESSER or GEER funds.

See the [CESA Purchasing Digital Learning Bridge website](#) for examples of vendors and purchases that can help to expand an LEA's cybersecurity and data security.

*Posted 7/21/2021*

**25. Can we use ESSER funds as a supplemental fund source to support other broadband initiatives including broadband grants?**

ESSER funds may be braided with other grants funds (e.g., the Public Service Commission's ARPA Broadband Access Grants) to meet local needs related to broadband expansion. An LEA should confirm with any other granting authority that this is allowable under the rules governing their grant program. DPI has information available on the [expanding broadband page](#) and offered a [webinar](#) that provides additional information.

- LEAs may choose to use their ESSER funds to support broadband expansion so long as the LEA can explain how the broadband will best meet student needs. Additional consideration must be given to the following when utilizing ESSER federal funds:
  - The LEA as the fiscal agent must retain ownership of any physical infrastructure (e.g., fiber optic cable) that is deployed using federal ESSER grant funds.
  - The term of service for the broadband project must not extend beyond the ESSER grant period of performance. All services provided by an internet service provider (i.e., internet access) must be received by the LEA during the ESSER grant period of performance. Leases for service or other contractual obligations cannot extend beyond the ESSER grant period of performance.
  - Projects must conform to the ESSER grant objectives, and the LEA must be able to reasonably demonstrate how the project will assist the LEA in addressing the impact of the COVID-19 pandemic on student learning.
- DPI provides LEAs with [tools](#) and [resources](#) to help demonstrate how broadband will support the students most impacted by the pandemic for their ESSER applications.

*Posted 9/10/2021; Updated 3/6/2023*

**26. May an LEA that has experienced significant, unbudgeted increases in unemployment costs use ESSER and GEER funds to pay for those costs?**

Yes. An LEA may use ESSER or GEER funds to pay for unemployment costs if necessary. As with all grant activities, the use of funds must meet all applicable Uniform Guidance requirements, and be reasonable and necessary to meet the purpose of the programs.

*Posted on 10/21/2021*

**27. How should an LEA document short term work (short term subs, substitute paraprofessionals, extended contract time)?**

Timesheets with supporting documentation would be acceptable, however make sure the time sheet identifies the work that was done. As an example, for a substitute teacher, having a signed off timesheet will not suffice, the time sheet must address the funding source, such as listing which teacher the sub was supporting. Additionally, this needs to be documented as the work happens and not after the work has been done or the expenditures will be considered unallowed costs (even if they were allowable costs when the work took place). The supporting documentation, not the timesheet, is what determines the allowability.

*Posted on 10/21/2021*

**28. As a result of COVID 19, an LEA may be experiencing a lack of substitute teachers which results in staff being unable to take personal days. May an LEA pay out personal days to staff due to a lack of substitute teachers as a result to COVID-19?**

Yes, this is allowable (U.G.G. 200.431(b/c)). This should be coded under Preparedness and Response to COVID-19.

*Posted on 10/21/2021*

**29. May our LEA use ESSER or GEER funds to purchase an exterior electronic sign to share event announcements and general information with the community including information related to COVID-19?**

No, this would not be a reasonable use of funds related to the ESSER and GEER grant objectives. An LEA should consider using local funds for exterior electronic signs used to convey information about school, athletic, and community events. ESSER and GEER funds must be used for costs that are reasonable and

necessary to prevent, prepare for, and respond to COVID-19 by allowing students and staff to return to and safely sustain in-person instruction. Expenses must also address the educational inequities that have been exacerbated by the COVID-19 pandemic including students' social, emotional, mental health, and academic needs. While an exterior electronic sign may communicate information about COVID-19 to the school and community, this would not be a reasonable use of funds.

*Posted on 7/18/2021*

**30. May our LEA use ESSER or GEER funds to purchase video surveillance equipment including cameras and the necessary software to manage the surveillance equipment?**

In order for an LEA to use ESSER or GEER funding to purchase video surveillance equipment, the LEA must respond to specific questions to ensure student privacy and civil rights considerations are adequately addressed. The LEA must also provide a rationale for why the video surveillance equipment is a reasonable and necessary expenditure that aligns with the grant objectives. See the [US Department of Education's ESSER and GEER Use of Funds FAQ question B-14](#). May ESSER and GEER funds be used for the cost of purchasing and installing video systems for security purposes? (New December 7, 2022).

LEAs will be asked by DPI staff to please provide responses to the following questions regarding the security camera system and software and corresponding surveillance activities.

- How does a security camera system allow the LEA to prevent, prepare for, and respond to COVID-19 including addressing students' academic, social, emotional, and mental health needs?
- How would the LEA comply with federal civil rights laws to ensure nondiscrimination based on race, color, national origin, sex (including sexual orientation and gender identity), disability, and age in the district's surveillance activities?
- Does the LEA have a clearly established policy on the use of video systems on school property? Provide any additional information on how the policy addresses student privacy concerns and FERPA.
- In order to create a plan for the ESSER III funds that meets the needs of local students and families, LEAs are required to hold stakeholder engagement sessions to ensure that they understand the needs of local students and families and the impact of the COVID-19 pandemic on students and families. LEAs must provide the public the opportunity to provide input to the ESSER III Plan and take such input into account.

To the extent present in or served by the LEA, LEAs must also consult with:

- American Indian Nations;
- Civil rights organizations (including disability rights organizations); and
- Stakeholders representing the interests of children with disabilities, English learners, children experiencing homelessness, children in foster care, migratory students, children who are incarcerated, and other underserved students

- Regarding the stakeholder consultation for ESSER III funding above, have the community and the LEA's stakeholders supported the use of federal ESSER III funding on purchasing security cameras?

LEAs should consider using ESSER funding for instructional materials, additional staffing supports for high-dosage tutoring or interventions, extending the school day or year through summer school or before/after school learning opportunities, professional learning for educators, social and emotional supports, mental health services, or other expenditures that conform with the ESSER grant objectives.

*Posted on 4/28/2023*

## Paying Employees and Contractors

- 1. If an LEA has discontinued payments to employees and/or contractors but intends to resume payments in full with the receipt of relief funds, when do those payments have to resume?**

An LEA resuming payments in full to employees and/or contractors must do so on or before the first day it incurs any expenditures that it intends to include in its budget for relief funds.

For example, if an LEA laid off employees and discontinued payments to contractors at the start of the public health emergency, and the LEA subsequently determines that its “greatest extent practicable” is to recall those employees and resume those payments on May 1, then the LEA’s ESSER budget could include allowable expenditures incurred from May 1 onward.

*Posted 6/12/2020*

- 2. If an LEA continues to pay all employees and pay contractors to the greatest extent practicable, can it implement a pay freeze for 2020-21 and still receive relief funds if all other conditions are met?**

Yes. The LEA would still receive relief funds so long as they continue to pay employees and contractors to the greatest extent practicable.

*Posted 6/12/2020*

- 3. Do LEAs need to update their certification regarding the continued payment to employees and contractors to the greatest extent practicable if their circumstances change (i.e. need to lay off staff at the end of the semester)?**

LEAs are encouraged to keep their certification regarding the continued payment to employees and contractors to the greatest extent practicable as up-to-date as possible. State legislators and vendor groups review this data periodically to ensure employees and contractors are continued to be paid during the pandemic.

*Posted 11/25/2020*

- 4. Will LEAs need to complete Time and Effort for ESSER grants?**

LEAs that are charging salary and wage expenses to the federal stimulus grants will need to record Time and Effort.

The level of detail needed for the supporting documentation is dependent on the job responsibilities for the employee/objectives of the federal funding source (ESSER). To meet the supporting documentation standard of time and effort reporting, each subrecipient must understand the objectives of the federal grant program, then for each employee charged to the federal grant program the subrecipient must determine and document if the position is a single cost objective or multiple cost objective. If 100% of the position could be charged to the federal grant program as an allowable cost then the position is a single

cost objective-this reporting has simplified procedures. For example, maintain job descriptions that demonstrate the allowability of 100% of the position's compensation (this can be combined with quarterly check-ins that specify the job responsibilities are still 100% toward the federally funded program, but this is up to the LEA to decide how this is maintained/supported).

If only a portion of the position's responsibilities are applicable to the federal grant program then they are considered to have multiple cost objectives. The subrecipient must be able to demonstrate the amount of time charged to the federal grant program. Suggested documentation would be class schedules for a specific subject, time sampling, personnel activity reports, etc. (This process is up to the LEA). Examples of documentation that would not qualify are job description percentages or percentage based on federal grant budgeted amounts. When looking at this report a good practice is to ask: "How do we know that we can charge the grant this amount of salary and benefits?". The supporting document must be such that an individual reviewing it could be reasonably assured that the costs were properly allocated and accurate. For a more detailed explanation and examples please see the [Federal Stimulus Funds Time and Effort document](#).

*Posted 10/21/2021*

**5. Under "Continued Staff Employment (18003(d)(12)", may LEAs code all of their staff under the ESSER/GEER grant(s) for the subsequent year?**

This is not advised. This action puts satisfying federal Maintenance of Effort requirements for ESEA and IDEA grant programs at risk. Coding all staff salaries to ESSER/GEER grants could reduce the LEA's state and local funds for instructional programs which in turn would have a negative impact on allocations of other federal grant programs (i.e. all the Titles under ESEA programs).

*Posted 10/21/2021*

**6. If an LEA hired additional staff due to COVID-19 (ex. Part-time health worker, custodian, bus driver, paraprofessional). Under ESSER II and III, is the LEA required to keep the employees if the LEA desires to utilize the ESSER II and III funding?**

Section 18006 of the CARES Act still applies, and states that subrecipients must "continue to pay its employees and contractors during the period of any disruptions or closures related to coronavirus." If an LEA is back in person, no longer needs the additional staff hired during hybrid or remote learning and does not continue to employ those staff, then the LEA would not be in violation of the requirements outlined under section 18006. The continued payment requirement ensured that staff and contractors were still paid (to the greatest extent possible) when everything was closed or modified due to COVID-19. The requirement does not apply if the LEA is no longer experiencing disruptions or closures related to COVID-19.

*Posted 10/21/2021*

## CARES Act Private School Equitable Participation

LEAs are required to provide equitable services to private schools with ESSER and GEER funds received under the CARES Act only. LEAs are not required to provide equitable services to private schools with funds received under CRRSAA and ARPA. CRRSAA and ARPA require DPI to provide equitable services to private schools.

- 1. Some of the students attending the private school that is located in our LEA's boundaries live in a neighboring LEA. Do we need to call the neighboring LEA and coordinate services for those students?**

No. LEAs only need to consult with and provide services to the private schools located in their boundaries. All students attending the private school(s) choosing to participate in the CARES Act ESSERF and/or GEERF grants are eligible for services/benefits.

*Posted 6/9/2020*

- 2. When LEAs gather the number of low-income children attending a private school, does that count include ALL low-income students—even those who do not reside in the LEA?**

Yes. Both the LEA and private school enrollment data should include all the low-income students, including those who do not reside within the LEA's boundaries.

*Posted 6/9/2020*

- 3. When can private schools begin making purchases with CARES Act funds? Do they need to wait for the LEA's application to be approved, or can purchases begin after we've consulted and before the application is approved? Private schools are concerned about shortages on the items they need the most if they delay these purchases.**

As with other federal funding programs (e.g. ESEA and IDEA), private schools are not allowed to obligate the federal funds. LEAs should follow their procurement procedures and make purchases and contract for services on behalf of private schools. LEAs may not reimburse the private school for supplies or materials they have purchased. In addition, any property, materials, or equipment purchased with ESSER and/or GEER funds for private school equitable participation must remain the property of the LEA (CARES Act, Section 18005).

*Posted 6/9/2020*

- 4. Do we count all the children attending the private school or just those between the ages of 5 and 17?**

LEAs are not required to limit the enrollment data to children between the ages of 5 and 17. LEAs and private schools must be consistent with their enrollment data. If the LEA is counting all children attending the LEA, then they must count all children attending the private school.

*Posted 6/9/2020*

5. **We have a private high school that is not serviced for Title I because our district only services elementary schools. Will that private school be eligible to receive services for equitable participation under ESSER or GEER if they don't receive Title I equitable services?**

Private schools may choose to participate in ESSER or GEER equitable participation even if they are not eligible for or choose not to participate in equitable services for Title I, Part A or any other federal program.

*Posted 6/9/2020*

6. **Can an LEA use the private school's income verification information from the 2020-21 Private School Choice Program application to determine the number of low income students attending the private school?**

The income verification information used to determine eligibility for the Private School Choice Program should not be used to determine low-income status for the CARES Act grants. The threshold used to measure poverty for the Private School Choice Program can be as high as 300% of the federal poverty level whereas the threshold used to measure poverty for national school lunch data, most often used by the public schools, can only be as high as 185% of the federal poverty level.

There are three key points LEAs need to meet when collecting low-income enrollment from the private school(s) for ESSER.

1. The threshold to determine low-income status in the LEA and all participating private schools needs to be the same. The measurement tool to collect low-income data does not need to be the same, but the threshold to determine low-income status does;
2. The LEA and private school(s) needs to collect the data in the same time period (e.g. both the LEA and the school(s) use the 2019 3rd Friday in September count or both the LEA and the school(s) use data collected in the spring of 2020, etc.); and
3. All students enrolled in the LEA and participating private school(s) must be included in the count for CARES Act Grants. Note that this is different from the Title I-A process, which includes the district of residence.

Please refer to the document on [Poverty Measurement Tools for Determining ESSER Equitable Participation](#) for more information.

*Posted 6/12/2020*

7. **If a private school wants non-capital equipment (devices such as tablets, laptops, etc.) for equitable participation, what happens with the devices when the grant period ends on September 30, 2022?**

There is no difference between CARES Act grant programs and other federal grant programs with regard to ownership and use of non-capital equipment. The non-capital equipment is the property of the LEA. Non-capital equipment purchased with CARES Act funds would be available to the private school for the duration of the grant period (through September 2022).

If after September 2022, the private school participates in other federally funded programs (such as Title IV, Part A of ESEA or IDEA), then the LEA may use the non-capital equipment to support those programs. The non-capital equipment must support the intended purpose of the federally funded program and be determined necessary for that program by the LEA and private school through consultation.

If after September 2022, the private school does not participate in any other federal program, then the LEA must collect the non-capital equipment for use with other federally funded programs in the LEA (2 CFR 200.314 and 34 CFR 76.661).

*Posted 6/22/2020*

**8. Can an LEA charge the private school if non-capital equipment is damaged?**

The LEA should follow its written procedures for loss, theft, or damage of property.

*Posted 6/22/2020*

**9. Should the private school follow the same procurement procedures the LEA uses for purchases?**

The private school shall not procure goods and services with CARES Act funds. LEAs are responsible for providing equitable services and therefore responsible for following their procurement procedures. LEAs may not reimburse private schools for any goods or services (CARES Act Section 18005).

*Posted 6/22/2020*

**10. Can an LEA require the private school to use the same technology the LEA uses to better support the program at the private school (i.e. Chromebooks versus Macs)?**

The LEA and private school should discuss this issue during consultation. If the LEA chooses to purchase technology they support rather than what the private school uses, then the LEA must explain to the private school in writing the reasons why the LEA made the decisions it did (20 USC 6320(b)(1)(H)).

*Posted 6/22/2020*

**11. Do private schools also have to offer an assurance that they have continued to pay employees or is this only a requirement for the LEA?**

This question is answered in the [Paying Employees and Contractors](#) section.

*Posted 6/22/2020*

**12. Do private schools also have to offer an assurance that they have continued to pay employees or is this only a requirement for the LEA?**

No. Private schools are not required to offer this assurance. Section 18006 of the CARES Act requires LEAs receiving funds under “Education Stabilization Fund,” shall to the greatest extent practicable, continue to pay its employees and contractors during the period of any disruptions or closures related to coronavirus.

*Posted 6/22/2020*

**13. Did DPI require private schools to sign private school affirmation forms (for both ESSER and ESEA grants) by June 30, 2020?**

No, this was not a requirement for either program. However, in order for LEAs to budget funds for these grant programs, LEAs must upload signed private school affirmation forms and DPI must accept those forms. ESEA grant applications are due on August 31, 2020 so forms for ESEA equitable participation will need to be signed and uploaded well before August 31st, that way the LEA may complete and submit their application on time. The due date for ESSER grants has not been established.

*Posted 7/14/2020*

**14. How does the indirect rate affect the calculation determining the private school equitable participation under the CARES Act?**

Indirect is not reserved prior to calculating equitable participation. LEAs should discuss indirect costs during the consultation with the participating private schools.

The amount for indirect costs can be budgeted under each subbudget based upon the LEA's unrestricted indirect rate, the available public or private share of available funds, and the total amount budgeted for direct costs within the subbudget.

*Posted 7/30/2020*

**15. Our LEA requires parents to sign a user agreement in order to check out technology, such as computers and hotspots. For the non-publics who would like to use CARES Act funds to purchase technology, is it the LEA's responsibility to have parents sign or is this something we can have a school representative sign and then allow them to use their own process for checking computers out to students?**

Since all supplies, materials, or devices purchased with CARES Act funds remain the property of the LEA, the LEA should ensure the same process for lending devices to students in the public schools is followed for the private school students when they are taking devices home. If the LEA process is to collect signed

forms from parents, then they could ask a private school representative to collect signed forms from students' parents on behalf of the LEA.

*Posted 7/30/2020*

**16. What is the LEAs responsibility to support technology used for private school equitable participation, such as updating security, if a battery dies, if a computer stops working, if something needs to be updated or replaced?**

Technology is the property of the LEA and the LEA should follow their policies and procedures for technology purchases regardless of if the technology is used in public or private schools. The cost to maintain the technology throughout the performance of the grant should be discussed with private school representatives and if reasonable and necessary, planned for in upcoming school years.

*Posted 7/30/2020*

**17. If there are additional costs to provide required transportation for private school students due to different private school schedules, additional buses needed for social distancing protocols, etc. can these costs be expensed to the private school's portion of the equitable shares of CARES Act funds or because transportation is required to be provided would these costs be part of the public allocation?**

The Wisconsin state law requiring transportation of eligible private school students by school districts ([Wis. Stat. § 121.545](#)), unless a district has exercised the "city option" ([§121.54\(1\)](#)), remains in effect. As this is a school district responsibility under state law, transportation for eligible private school students is not an equitable service in and of itself and may not be paid using CARES Act funds. This includes the provision of transportation if a private school is open but district public schools are closed and providing remote instruction.

Specific, additional costs related to implementing social distancing for transportation (such as adding bus routes or installing physical barriers) are an eligible use of CARES Act funds. A district may include a discussion of transportation social distancing costs in their private school consultation and, as appropriate, charge a reasonable and allocable share of those additional costs as an equitable service to the private schools' portion of the district's grant.

More information on transportation for private school students is available on the DPI website: <https://dpi.wi.gov/parental-education-options/transportation/private-school-information>.

*Posted 8/27/2020*

**18. If the amount of funds available to support the private school are not enough to cover the full cost of requested materials or devices, can the private school pay for a percentage of the cost(s)?**

No. An LEA must have full control and ownership of any items, materials, and services purchased with CARES Act funds. In order for the LEA to meet their responsibility in managing and having full control of the equipment, it is not possible for the private school to have any title rights to the equipment.

*Posted 10/8/2020*

**19. Can devices purchased with CARES Act funds be used to support religious instruction?**

No, devices purchased under the grant must be used to provide secular instruction. Educational services or benefits under the grant, including the use of materials and equipment, must be secular, neutral, and non-ideological (20 U.S.C. 6320(2)(a)).

*Posted 10/8/2020*

**20. Can an LEA use ESSER and/or GEER funds under the CARES Act funds to support substitute teachers working in the private school?**

The LEA may use CARES Act funds to pay for substitute teachers for private school staff attending instructional staff training and or working to develop curriculum to respond or prepare for COVID-19.

The LEA may not pay for substitute teachers in the private school to support the existing level of instruction in the private school (34 CFR 76.658).

*Posted 7/30/2020*

**21. What are some general items of cost that would not be allowed for private school equitable participation under the CARES Act?**

The Education Department General Administrative Regulations (EDGAR) prohibits some specific items of cost for private school equitable participation. This includes construction, private school employee salaries, and equipment that can't be removed from the private school without remodeling (34 CFR 76.651-76.662). Some unallowed items are listed on the next page, with alternative options that would be allowed. Note, this is not an exhaustive list.

| <b>Unallowed Cost for Private School Equitable Participation</b>                                                     | <b>Alternatives</b>                                                                                                                                                                                                                                                                                                                                                                                                |
|----------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Replacing drinking fountains with refillable water bottle stations<br><br><i>Posted 6/9/2020</i>                     | The LEA could contract with a bottle water delivery service.                                                                                                                                                                                                                                                                                                                                                       |
| Salaries of private school staff<br><br><i>Posted 6/9/2020</i>                                                       | Private school administrators may use the <a href="#">Paycheck Protection Program</a> (also part of the CARES Act) to pay the salaries of the private school staff. The Paycheck Protection Program is separate from the ESSERF and GEERF grant programs. (Note: private schools that utilize the Paycheck Protection Program after December 27, 2020 will not be eligible for the <a href="#">EANS program</a> .) |
| Constructing new walls to reduce the number of students in a classroom<br><br><i>Posted 6/9/2020</i>                 | The LEA could provide temporary partitions that can be removed from the private school once it is safe to do so.<br><br>The LEA could purchase or rent a classroom trailer for the private school to use.                                                                                                                                                                                                          |
| Installation of touchless soap dispensers and paper towel dispensers on bathroom walls<br><br><i>Posted 6/9/2020</i> | The LEA could purchase or rent freestanding touchless soap dispensers and paper towel dispensers.<br><br>The LEA could purchase or rent free standing hand sanitizing stations.                                                                                                                                                                                                                                    |
| Wiring the private school for WIFI<br><br><i>Posted 6/9/2020</i>                                                     | The LEA could purchase hotspots and data plans for students in the private school to use.                                                                                                                                                                                                                                                                                                                          |

|                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Update the HVAC system in the private school</p> <p><i>Posted 7/30/2020</i></p> | <p>Upgrade HVAC filters (not the actual system) as appropriate for the specific system.</p> <p>Use portable air cleaners (also known as air purifiers) to supplement the HVAC system ventilation and filtration.</p> <p><i>Considerations:</i></p> <p>The use of air cleaners alone cannot ensure adequate air quality, particularly where significant pollutant sources are present and ventilation is insufficient.</p> <p>Do not use ozone generators in occupied spaces. Some products sold as air cleaners intentionally generate ozone. These products are not safe to use when people are present because ozone can irritate the airways. When used at concentrations that do not exceed public health standards, ozone applied to indoor air does not effectively remove viruses, bacteria, mold, or other biological pollutants.</p> |
|------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

## LETRS Grants

- 1. Does the LETRS grant signal DPI's reading priorities? Is DPI requiring all educators to complete LETRS training?**

This grant was developed by elected members of the Wisconsin Joint Committee on Finance, not by DPI. There is no requirement that all Wisconsin educators complete LETRS training.

*Posted 6/24/2022*

- 2. If my LEA/CESA does not want to participate in LETRS, what are the eligible alternative reading trainings?**

Per Wisconsin Motion 57, eligible alternative reading trainings are available on this [website: https://effectivereading.org/knowledge-and-practice-standard](https://effectivereading.org/knowledge-and-practice-standard).

*Posted 6/24/2022*

- 3. How do I know which alternative reading training is right for my LEA/CESA?**

DPI encourages LEAs and CESAs to review their literacy vision, literacy beliefs, data about local student literacy needs, and literacy-focused elements of local school improvement plans. If you choose to accept the \$4,000 reading training grant, DPI recommends that your reading professional development selection be aligned to local student needs, local vision, local beliefs, and local school improvement plans.

Each CESA has conducted extensive research into the cost, time commitment, and content of the eligible reading trainings. Therefore, DPI encourages LEAs to reach out to their local CESA to inform their decision about which reading training is best aligned to their local needs and priorities.

*Posted 6/24/2022*

#### **4. What are allowable expenses for the \$4,000 LETRS or eligible alternative grant?**

These grant funds may only be used to pay an eligible vendor for the cost of the course and required training materials. While CESAs may choose to host these reading trainings, they are not an eligible vendor for this grant, therefore they may charge an additional fee for hosting these reading trainings.

The following WUFAR combinations will be available in WISEgrants:

- Fund 10 (General Education) or Fund 27 (Special Education), Object 310 (Payment to Private Vendor), Function 221300 or Function 264400
- Fund 10 (General Education) or Fund 27 (Special Education), Object 382 (Payment to LEA), Function 221300 or Function 264400
- Fund 10 (General Education) or Fund 27 (Special Education), Object 386 (Payment to CESA), Function 221300 or Function 264400

Only the cost of the vendor payment is eligible for reimbursement. Costs related to staff compensation, substitute teachers, employee travel, stipends, and consortium administrative fees are not eligible for reimbursement. Materials, supplies and books provided as part of the vendor training should be coded to object 310, 382 or 386 (as applicable).

*Posted 6/24/2022*

#### **5. My LEA/CESA wants to participate in LETRS training, but the vendor will not accommodate single participants. What should I do?**

An LEA or a CESA may purchase seats from an approved vendor on behalf of other agencies to meet 'minimum seat requirements.' In those cases, the LEA or CESA would invoice the participating agencies and those agencies would submit claims for LETRS reimbursement. (E.g. a CESA/LEA purchases multiple seats for LETRS training and actual participants include staff from multiple LEAs and CESAs. The CESA/LEA that purchased multiple seats invoices participants. Participants submit their LETRS claims and pay the purchasing agency.) Note that if the purchasing agency decides to charge any fees above and beyond the cost of the course and required materials, those fees may not be claimed against this grant. See #6 for more information.

*Posted 6/24/2022*

#### **6. Who is eligible to participate in the \$4,000 LETRS or eligible alternative reading training?**

*Created 6/9/2020; Last Update: 3/6/2023*

Administrators (general education or Special Education) and teachers (general education or Special Education) are eligible to participate in this grant-funded reading professional learning.

*Posted 6/24/2022*

**7. A staff member completed LETRS training in a previous school year. Can we use these grant funds to cover that expense?**

Technically, yes but talk to your local business services staff. As with all ESSER funds, these funds may be used on allowable expenses incurred between March 2020 and September 2024. At the same time, local business services staff must follow accounting rules and procedures that include fiscal year deadlines, so talk to your business services staff to understand their deadlines and accounting procedures.

*Posted 6/24/2022*

**8. How does my LEA or CESA accept the reading grants we are eligible for?**

LEAs and CESAs will accept or surrender reading grants they are eligible for in the WISEgrants system.

*Posted 6/24/2022*

**9. What if my LEA/CESA initially surrenders or does not reply to the \$4,000 LETRS grant opportunity in WISEgrants by July 8, 2022?**

If an LEA/CESA does not accept the \$4,000 LETRS grants in WISEgrants by the July 8, 2022 deadline, DPI will interpret that as surrendering the funds and those funds will be reallocated according to the rules outlined in Wisconsin Motion 57 for unused reading initiative funds. DPI anticipates that there will be more opportunities to accept funds in the future. The exact amount will depend upon the amount of unused funds remaining.

*Posted 6/24/2022*