Ohio | Department of Education

CCIP Note #472

Re: Steps to Complete ARP ESSER III District Allocations and Applications
Date: May 7, 2021
To: Superintendents, Treasurers, Authorized Representatives, Fiscal Representatives and Consolidated Funding Application Contacts of Public Districts, ESCs and Community Schools

American Recovery Plan Elementary and Secondary School Emergency Relief Fund (ARP ESSER)

The Ohio Department of Education (Department) has released the ARP ESSER Application and local educational agency (LEA) allocations in the CCIP. LEAs can access their CCIP application and allocations through the OH|ID Portal, CCIP, select Funding > Funding Applications and choose "Fiscal Year 2022 (FY22)". The application is titled ARP ESSER. A PDF version of the ARP ESSER LEA application and summary of the allocations may be found in the CCIP Document Library under the American Rescue Plan (ARP) Act > ARP ESSER folder. The CCIP Document Library can be found HERE.

Steps for LEAs to Take to Complete the Application

The US Department of Education (USED) issued Interim Final Requirements (IFR) on the ARP ESSER. Given the significant requirements outlined in IFR, the LEA ARP ESSER application will include significant budget details and planning for the uses of funds. Details of those requirements are outlined in more detail in the PDF version of the application noted above.

The steps needed to apply for the funds will be different from the typical grant process given the USED's interpretation on the definition of allocation, access to funds and various timelines that need to be met. As a result, the Department is requesting the LEAs address the application process in phases and steps:

Step 1: **On May 10**, the Department is releasing the ARP ESSER application with only $1.00 of funds allocated for all eligible LEAs. The first step is for the LEAs to check all the ARP ESSER assurances on the budget details page submit it through the CCIP by **May 17, 2021**. Any assurance that is not checked will result in an error message and will prohibit the application from being successfully submitted. The assurance is considered submitted when the application is in Authorized Representative Approved status. This is the first phase of this application process.

Step 2: **By May 17, 2021** the LEA must have agreed to the ARP ESSER assurances on the budget details page and submit through the CCIP.

Step 3: **By May 24, 2021** the Office of Federal Programs will send a history log message (to the LEAs that successfully submitted their assurances) acknowledging receipt of assurances, establishing that date as the substantially approved application for obligation purposes and loading the LEA allocations in the CCIP. The ARP ESSER application will be returned to the LEA in consultant-not-approved status. The LEA will be able to begin budgeting and completing all necessary reporting and planning requirements. The LEA will have 90 days to submit a complete application. This is the second phase of the application process.

Step 4: **By June 24, 2021** the LEA is required to post on the LEA website their plan for in-person instruction and continuity of services. The Department will be providing more details in the coming weeks on what is required for this "continuity of services" plan and suggestions on how other publicly reported information by the LEAs may be used to assist in this requirement. The "continuity of services" plan needs to be revised and updated regularly with stakeholder input. Please keep in mind that the "continuity of services" plan is a required assurance under ARP ESSER and is different than the ARP ESSER funding application in the CCIP.

Step 5: **By August 20, 2021** the LEA must complete and submit the entire ARP ESSER application with all applicable budget and reporting information. This is the final phase of the application process and will fulfill the 90-day requirement to submit the LEA ARP ESSER plan.

Step 6: **On a rolling basis,** but no sooner than May 24, 2021, the Office of Federal Programs will begin reviewing and approving LEA ARP ESSER applications (that are complete with all requested information) for the LEA to begin drawing funds. The plan review will include a focus on the quality and completeness of the LEA application for final approval. The information requested from the LEAs is an important part of the State's ARP plan requirements. Once the LEA application is in Final Approved status, the LEA will have access to submit Project Cash Requests (PCRs) for the ARP ESSER funds.

Special Spending Note: While the LEA is working on their ARP ESSER budgets and plans, we urge LEAs to continue spending the ESSER I and II funds on allowable activities. ESSER I and ESSER II funds expire before the ARP ESSER funds. LEAs are permitted to use ESSER I, ESSER II and ARP ESSER on allowable activities back to March 13, 2020 when the emergency was declared.

Program	**ESSER I**	**ESSER II**	**ARP ESSER**
Period of Availability including 12-Month Tydings Amendment	March 13, 2020 through September 30, 2022	March 13, 2020 through September 30, 2023	March 13, 2020 through September 30, 2024

Expedited Access to ARP ESSER Funds

The Ohio Department of Education understands the importance of providing these emergency relief funds in an expeditious fashion and has taken the appropriate steps to achieve that result. The Department will award funds in accordance with the uniform guidance to ensure the proper oversight and appropriate use of the billions of dollars of taxpayer funds. The process of reviewing and approving budgets and plans for the uses of funds is a necessary component in this process and helps to minimize issues later during the compliance review process.

The approach taken by the Department is somewhat more customary and consistent with past practice than what is implied in USED's interpretation of the Interim Final Requirements. However, the result is largely the same. Providing an award and access to funds without proper budgeting and planning creates potential risks for improper use of funds and weakens Ohio's well-established internal controls

process. That said, we believe that the approach being taken by the Department will not, in any way, delay access to financial resources to those districts and schools who have time-sensitive needs. LEAs already have access to their ESSER I and ESSER II funds if they have an approved budget as well as the ability to apply costs of the ESSER COVID Relief programs back to March 13, 2020. The Department understands that some LEAs may have already spent their ESSER I and ESSER II funds and need access to ARP ESSER funds more quickly than the process outlined above. For those districts, please contact the Office of Federal Programs and discuss your request with your assigned federal consultant so that you can be accommodated.