ARP ESSER Extended Learning and Recovery Grant
Frequently Asked Questions

1. **Is this grant subject to Uniform Grant Guidance (UGG) and Education Department General Administrative Regulations (EDGAR)?**

   Yes. The ARP ESSER grantees must follow Uniform Grant Guidance (UGG) and the Education Department General Administrative Regulations (EDGAR). Among other requirements, all expenses paid with ARP ESSER funds must be necessary and reasonable under the circumstances. What might be necessary and reasonable in one circumstance might not be in another.

2. **Does this grant have a supplement, not supplant requirement?**

   No. The supplement, not supplant rule does not apply to ESSER funds.

3. **Does this grant require a Final Expenditure Report (FER)?**

   Yes. ESCs will complete the Final Expenditure Report (FER) beginning with fiscal year (FY) 2023 since the grant is in the FY23 Application in CCIP. Any carryover funding will be moved into FY24. Recipients must obligate and expend the remaining funds by 9/30/24.

4. **May an indirect cost be charged to the grant?**

   Yes. If your ESC has an approved Indirect Cost Rate from the Department, you may charge the unrestricted rate to this grant. Please note that if you submit the grant prior to July 1, 2022, you must use the FY22 approved rate. After July 1, 2023, you must use the FY23 approved rate. Additional information and application materials for Indirect Costs can be found on the Department website here.

5. **If we use an approved Indirect Cost Rate, can we also budget funds on the Governance/Administration line of the budget grid?**

   ESCs may budget funds on the Governance/Administration line but are reminded that they should be able to demonstrate how these funds are reasonable and necessary. Generally, there should be no more than 10% budgeted for Governance/Administration.

6. **Is there a requirement to upload any revisions made to the budget?** Yes. For each revision to the budget, the ESC should complete, sign, and upload a new grant template. We ask that you leave all previous versions of the template in the CCIP and name the uploaded file accordingly so that it is obvious that it is a revision. If you have multiple revisions, consider naming the files with revision numbers.

7. **Are there any restrictions to what we are allowed to charge to this grant?**

   As with all grants, the funds must be used according to the allowable purposes. For this grant, the Department is limiting the uses of these funds to activities to address learning loss. Specifically, the recipient of these funds shall address learning loss according to one or more of the following activities:

   - administering and using high-quality assessments to assess students' academic progress and meet students' academic needs, including through differentiating instruction;
   - implementing evidence-based activities to meet the comprehensive needs of students;
   - providing information and assistance to parents and families on how they can effectively support students, including in a distance learning environment; and/or
   - tracking student attendance and improving student engagement in distance education.

8. **Are the ESCs (award recipients) permitted to subgrant these funds?**

   The Department does not recommend or support subgranting. For the Department to allow for an ESC to subgrant this award, the ESCs would need to demonstrate to the Department that the recipient of such a subgrant is able to comply with Federal Financial Management and Internal Controls. The ESC would need to create their own agreement/contract with their legal counsel.

9. **May an ESC use these funds to reimburse an LEA for the cost of substitute needed for their teachers attending professional development and trainings?** Yes. As with all grants, the charges must be reasonable and necessary. The ESC should maintain documentation to verify which people attended the professional development and for what length of time to ensure that the reimbursement is appropriate.

10. **Is it allowable to pay teachers who participate in trainings outside the regular workday and/or summer with a stipend?**

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

11. **May the ESCs use these funds to pay the salary for teachers already employed by the LEA?**

    The ESC should work with their legal counsel to develop a contract/MOU with the LEA if it wishes to use the Extended Learning and Recovery funds to pay for teachers of an LEA whose work focuses on learning loss. The ESC is the fiscal agent and responsible for following all federal requirements.

12. May the ESC use these funds to purchase food for people attending trainings or professional development on this program?

Generally, the answer is no. **There is a very high burden of proof to show that paying for food and beverages with Federal funds is necessary** to meet the goals and objectives of a federal grant. When a grantee is hosting a meeting, the grantee should structure the agenda for the meeting so that there is time for participants to purchase their own food, beverages, and snacks. In addition, grantees may want to consider a meeting location in which participants have easy access to food and beverages. While these determinations will be made on a case-by-case basis, there may be some circumstances where the cost would be permissible. These circumstances will be rare. Therefore, grantees will have to make a compelling case that unique circumstances justify these costs as reasonable and necessary. Consult with your legal counsel for additional questions.