CCIP Note #562

Re: ARP ESSER Closeout and Sustainability, Monitoring, and Real Property Recording and Reporting
Date: November 8, 2024
To: Authorized Representatives, Fiscal Representatives and Consolidated Funding Application Contacts of Traditional Districts, Community Schools, Independent STEM Schools, Education Service Centers, Board of Developmental Disabilities, JVSDs, and Nonpublic Schools

ARP ESSER CLOSEOUT

CCIP Note 554 outlines important ARP ESSER closeout deadlines and reminders. CCIP Note 556 lays out important information about late liquidation. The note below summarizes the new Department of Education and Workforce (DEW) guidance on ARP ESSER sustainability, closeout monitoring, and real property recording and reporting.

NEW ARP ESSER SUSTAINABILITY GUIDANCE

The Department has released new guidance concerning the closeout of ARP ESSER and the sustainability of programing funded from ARP ESSER. In this guidance, LEAs can find more information on dates and deadlines, considerations about end of grant reporting, and sustainability through ESEA funding. This guidance may be found here.

ARP ESSER FY25 MONITORING

ARP ESSER FY25 closeout monitoring will be released soon. ARP ESSER monitoring will remain located in the Fiscal Year FY24 section of the Monitoring system for the LEAs selected for FY25 monitoring. Approximately 40 LEAs will be monitored. If the LEA is chosen for monitoring, the assigned Education Program Specialist will reach out to advise of them of the requirement and deadlines. See the FY24 ESSER Monitoring Manual for information on the surveys and accessing the system.

GUIDANCE ON RECORDING A NOTICE OF FEDERAL INTEREST (NFI) AND REPORTING ON REAL PROPERTY

On March 21, 2024, the United States Department of Education released guidance regarding recording and reporting requirements for Federal funds used to improve facilities, including school buildings. All grantees and subgrantees that have a renovation, major remodeling, construction (34 CFR §222.176(a)), or real property project (2 CFR § 200.1) in any Elementary and Secondary School Emergency Relief (ESSER) or Governor's Emergency Education Relief Fund (GEER) grant are subject to this recording and reporting.

REQUIREMENTS TO RECORD A NOTICE OF FEDERAL INTEREST (NFI)

Grantees who spent an excess of $1 million on a singular renovation, major remodeling, construction, or real property project in any Elementary and Secondary School Emergency

Relief (ESSER) fund or Governor's Emergency Education Relief (GEER) fund are required to record the Notice of Federal Interest (NFI) to their local jurisdiction by **January 28, 2025**. LEAs should contact their county recorder and/or legal counsel for further information on filing the NFI.

REQUIREMENTS ON REAL PROPERTY REPORTING

The reporting requirement (2 CFR § 200.330), set by the Office of Management and Budget (OMB), provides that grant and subgrant recipients must report annually, for **at least the first 15 years**, on the status of the real property in which the Federal government has made a monetary investment and therefore has an ongoing interest. DEW will be releasing a survey and instructions in the coming months to all entities subject to this requirement.

For assistance, please contact the Office of Federal Programs at federalprograms@education.ohio.gov.