

Finishing Strong: American Rescue Plan Act (ARP) Elementary and Secondary School Emergency Relief (ESSER) Program and Closeout

4/15/2024

Agenda



- 1. The ARP ESSER Program: A glimpse into the world of American Rescue Plan (ARP) ESSER
- 2. Program Closeout: What are the necessary actions to take to close out your ARP ESSER grants?
- 3. Knowledge Check
- 4. Questions?

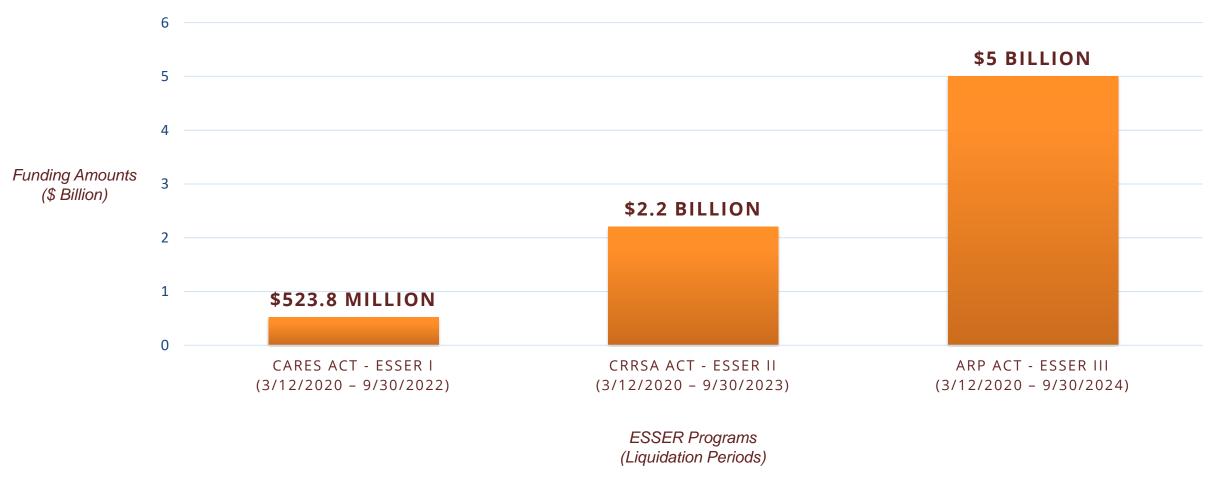


ARP ESSER Fundamentals



ESSER Allocations in Pennsylvania

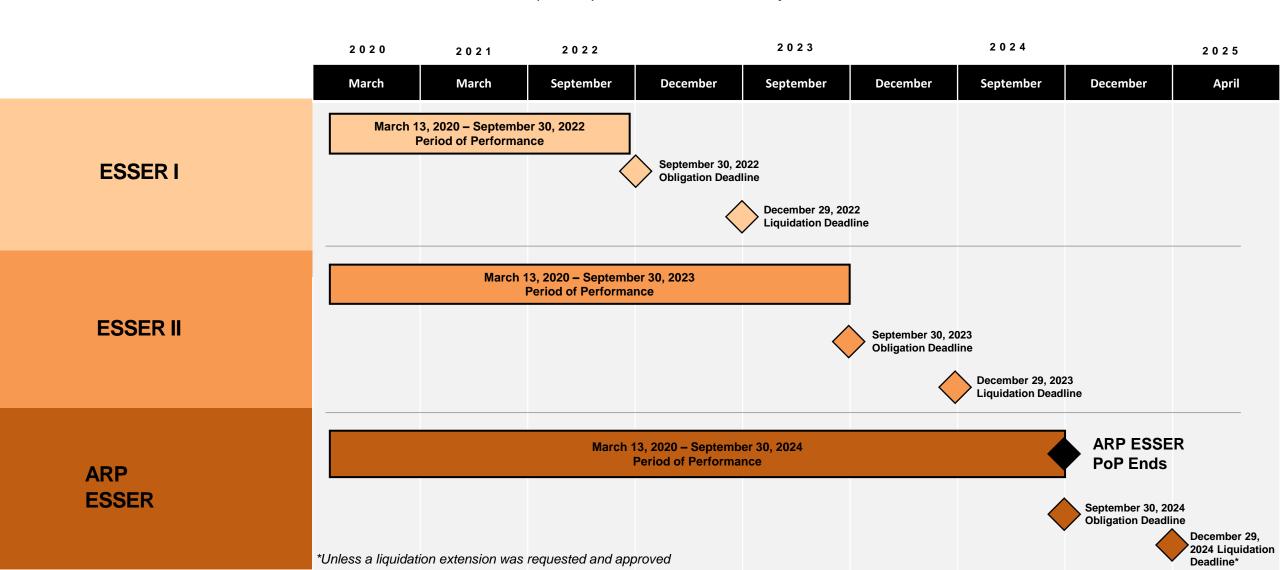
Pennsylvania received over \$7.7B in ESSER funding across ESSER I, ESSER II, and ESSER II





ESSER Grant Timelines

ARP ESSER Period of Performance (PoP) end date is September 30, 2024!





Allowable Uses of ESSER Programs

- The following activities are allowed under ESSER I, ESSER II, and ARP ESSER
 - Coordinate preparedness and response efforts to COVID-19
 - Provide principals and other school leaders with resources to address individual school needs
 - Address the unique needs of low-income children, children with disabilities, English learners, racial and ethnic minorities, students
 experiencing homelessness, and foster care youth
 - o Implement systems to improve LEA preparedness and response efforts
 - o Provide professional development for LEA staff on sanitation and minimizing the spread of infectious disease
 - Plan for and coordinate operations during long-term closures, including providing meals, technology for online learning, guidance for carrying out Individuals with Disabilities Education Act (IDEA) requirements, and providing educational services
 - o Purchase educational technology (including hardware, software, and connectivity) for students
 - Provide staff and student mental health services and supports
 - Plan and implement summer learning and supplemental afterschool programs
 - Initiate other activities necessary to maintain LEA operations and services and employ existing LEA staff, including activity authorized by the Elementary and Secondary Act (ESEA)
 - Address learning loss among students, including low-income students, children with disabilities, English learners, racial and ethnic minorities, students experiencing homelessness, and children and youth in foster care
 - Make school facility repairs and improvements to enable the operation of schools to reduce the risk of virus transmission and exposure to environmental health hazards and to support student health needs
 - Inspect, test, repair, and other projects to improve the indoor air quality in school facilities
 - Develop strategies to implement public health protocols policies for the reopening and operation of school facilities



ARP ESSER Breakdown

ARP ESSER had multiple allocations across funding codes for various purposes, detailed below

90% Main Distribution (990)

- Main ARP ESSER funds were distributed to LEAs for various purposes of which 20% must be used towards learning loss*
- 7% Set-Aside: 5% Learning Loss (994)
 - Implementation of evidence-based interventions to address learning loss. Additional cost tracking requirements apply*
- 7% Set-Aside: 1% Summer Enrichment (995)
 - Implementation of evidence-based summer enrichment programs
- 7% Set-Aside: 1% After-School Program (996)
 - Implementation of evidence-based afterschool programs
- 2.5% Set-Aside: Relief for Other LEAs (998)
 - Must be spent in accordance with section 2001(e)(2) of the ARP Act and includes programs for delinquent, neglected, and at-risk youth

ARP ESSER 20% Learning Loss



Of the 90% ARP ESSER distribution, at least 20% of funding must address learning loss per Section 2001 (e) (1) of ARP Act.
This funding should be coded to funding code 990; consider tracking these expenses separately to make sure the minimum requirement is met.

Mandatory Reserve

- LEAs must reserve at least 20% of the 90% ARP ESSER award to address learning loss
- While learning loss portion of costs should be tracked, there is no separate Chart of Account code for this portion. These costs should be coded as 990.

Implementation

- The purpose of this reservation is to address learning loss through implementation of evidence-based interventions, such as:
 - Summer learning or summer enrichment
 - Extended School Day
 - After-School Programs
 - Extended School Year Programs

Purpose

 LEA must make sure that interventions respond to students' social, emotional, and academic needs that address the disproportionate impact of COVID-19 on underrepresented student subgroups



5% Learning Loss Set-Aside

- For the 5% ARP ESSER Learning Loss Set-Aside distribution, at least 48% of funding must address evidence-based interventions per Section 2001 (f) (1) of the ARP Act.
 Pennsylvania ACT 24 of 2021 prescribes other use requirements in the categories below.
 This funding should be coded to funding code 994, consider tracking these expenses separately to make sure minimum requirement is met.
 - At least 30%
 - o **Must** be targeted to **social**, **emotional**, **or mental health supports** to students
 - At least 10%
 - Must be targeted to professional development and technical assistance to educators and school staff to address the social, emotional, and mental health needs of students
 - At least 8%
 - o **Must** be targeted to **reading support** and improvement for students



ARP ESSER Late Liquidation Overview

- Applies across the ARP ESSER Grant Program including Set-Asides
 - o For Allowable Costs such as:
 - HVAC contracts
 - Instructional Services Contracts
 - Delayed materials/supplies and contract labor shortages
 - Other allowable uses
 - Funds must be obligated by September 30, 2024 (if unable to spend by December 29, 2024 liquidation deadline)
 - Applicable only for justifiable circumstances, needing more time to spend funds is **not** a justification for a liquidation extension

ARP ESSER Late Liquidation Timeline



The late liquidation 14-month extension period is through March 28, 2026

2020 2024 2024 2025 2023 2025 2025 2025 2026 March September September December January March September **December** March March 13, 2020 -**ARP ESSER PoP Ends September 30, 2024** Period of Performance (PoP) **September 30, 2024 Obligation Deadline** December 29, PDE 2024 PDE Liquidation Liquidation Deadline* **Deadline** ARP ESSER US DE January 28, 2025 Liquidation **Statutory Liquidation** Late liquidation **Deadline** Date Period Ends, March 28, 2026 Late liquidation Period



ARP ESSER Late Liquidation Process Instructions

LEA's requesting late liquidation must complete DE's ARP ESSER EANS Liquidation Extension Request form

- ARP ESSER EANS Liquidation Extension Request form to PDE, available <u>ARP ESSER</u> <u>Liquidation Extension</u>
- Information should reflect valid data as of September 30, 2024
- Subrecipient Information Tab: Columns F, G, and H summarizing current amounts should calculate automatically once financial data is entered for the allocation total, amount obligated, and amount liquidated
- Subrecipient Information Tab: Columns I, J, and K should represent LEA-specific
 justifications currently available and may also include any other relevant subrecipient data
 notes
- All supporting documentation should be available and on file consistent with 2 CFR 200.334
- Late liquidation requests should be consistent with ED guidance



Program Closeout

Program Closeout



As defined by 2CFR §200.1, closeout is the process by which the Federal awarding agency or pass-through entity determines that all applicable administrative actions and all required work of the Federal award have been completed and takes actions as described in §200.344

- a) Recipient must submit all required reports within 120 days. Subrecipient must do so within 90 days, with possible extensions
 - Submit your FER and Budget revision
- b) Non-Federal entity must clear financial obligations within 120 days, unless an extension is granted
 - Liquidate funds and reconcile ledgers
- c) Prompt payments must be made by the Federal agency for eligible costs
- d) Non-Federal entity must promptly refund any unobligated cash, following specific guidelines
 - Return unspent funds
- e) Adjustments to the Federal share of costs must be settled according to the award terms
- f) Non-Federal entity must account for all property acquired with Federal funds
 - Keep inventory lists up-to-date
- g) Federal agency must promptly complete all closeout actions, ideally within a year of the end of the performance period
- h) If reports aren't submitted, closeout proceeds with available information within a year
- i) Failure to submit reports may result in reporting to FAPIIS and potential enforcement actions
 - Submit reports on time



PDE Closeout Requirements

- Is funding fully spent, regardless of Period of Performance deadline?
 - Once all funds are fully expended for ARP ESSER the Final Expenditure Report (FER) must be submitted within 30 days
- Have you reconciled your ARP ESSER expense subledger to reflect actual costs incurred?
- Do your expenses align with the allowable uses as outlined in the Appendix B Budget?
 - If your actual cost by function code is greater or equal to 20% compared to budget amount, a budget revision should be submitted. Please see LEA Budget and Program Revision Procedures instructions
- Have you completed the FER? Is it submitted in eGrants?
 - Budget revisions must be approved before the FER is created
 - FER amounts entered in eGrants should reflect actual recorded expenditures
- Have you addressed all your Observations (if any) from the monitoring visit?
- Do you have all the relevant documentation to support your expenditures as reported in your internal records and FER?



Closeout Process

The following processes must be completed for closeout

Work Deadline Review

 Expenses submitted must be within the work deadline and Period of Performance. Time extension request should be submitted for expenses outside the work deadline

Reconciliations

 General Ledger should reflect the actual cost incurred. The Budget should be revised if actual expensed amount is greater or equal to 20% for any line item (function) of the current budget.

Allowable Uses

Expenses claimed should align with allowable uses in accordance with ESSER guidelines

Expense Documentation

 Expenses claimed at closeout must be supported with an invoice/receipt or timesheets. Proof of payment is recommended to support costs for each work category and costs over the current budget

Final Expenditure Report (FER)

Costs recorded in the FER should reflect actuals spent during the period of performance of the grant.



Final Expenditure Report (FER)

 The Final Expenditure Report is a document to close projects and approve final payments. The FER MUST equal the total expenses claimed in the General Ledger and should be supported by the current/revised budget and retained documentation, such as invoices, payroll, proof of payment (POP), procurement, etc. The Commonwealth of Pennsylvania requires supporting documentation to be retained for a minimum of seven years



Closeout Observations

Six Observations that result from closeout re

1. Final Expenditure Report Not Submitted

• The Subrecipient did not submit a FER within 30 days of spending funds

2. Budget Revision Not Submitted

 The Subrecipient did not submit a budget revision where variances to the approved budget amounts were at or exceeded 20 percent by function code

3. FER Does Not Match GL at Object Code Level

 The Subrecipient's Final Expenditure Report (FER) and General Ledger amounts did not match at the Object Code level

4. No Subledger to Support FER

• The Subrecipient did not provide a subledger to support the FER reported amounts

5. FER Total is Greater than GL Total

 The Subrecipient's total as listed on their Final Expenditure Report (FER) was greater than the total on their General Ledger

6. FER Total is Less than GL Total

 The Subrecipient's total as listed on their Final Expenditure Report (FER) was less than the total on their General Ledger



Knowledge Check



What is the regular state liquidation deadline and late liquidation deadline?

- a) January 28, 2025 & March 28, 2026
- b) December 29, 2024 & March 28, 2026
- c) September 30, 2025 & January 28, 2026
- d) March 13, 2020 & September 30, 2024



What two ARP ESSER allocations have additional requirements which do not have a separate Funding Source code to track?

- a) Learning Loss 1% & Summer Programs 1%
- b) ARP ESSER 90% & Learning Loss 5%
- c) Learning Loss 5% & Afterschool Programs 1%
- d) ARP ESSER 90% & Summer Programs 1%



The ARP ESSER 20% Learning Loss Set Aside is intended for the following evidence-based interventions except:

- a) Summer learning or summer enrichment
- b) Extended School Day
- c) Extended Mental Health Fieldtrips
- d) After-School Programs
- e) Extended School Year Programs



Without considering late liquidation, when must ARP ESSER funds be obligated by?

- a) March 28, 2025
- b) January 28, 2025
- c) December 29, 2024
- d) September 30, 2024



How should LEAs apply for late liquidation?

- a) Submit an email request to the Division of Federal Programs
- b) Submit completed ARP ESSSR EANS Liquidation Extension Request form to PDE
- c) Submit a written request to the Monitors
- d) Submit completed ARP ESSER EANS liquidation Extension Request form to the Monitors



At what point(s) during the grant lifecycle is your FER due?

- a) Within 30 days of funds being liquidated
- b) Within 30 days of your latest budget revision
- c) Within 30 days of the grant liquidation deadline
- d) Both (a) and (b)
- e) Both (a) and (c)



In which of the following scenarios must you submit a budget revision prior to closing out your grant?

- a) When your actual cost for any object code are greater or equal to 20% of the budget
- b) When your FER and Subledger don't match at the object code level
- c) When the monitoring team tells you to
- d) When your actual cost for any function code are greater or equal to 20% of the budget



True or False: Costs recorded in the FER should reflect actual amounts spent and recorded during the period of performance of the grant.

- a) True
- b) False



What is the record retention requirement in Pennsylvania?

- a) 5 Years
- b) 12 Years
- c) 7 Years
- d) 10 Years



What should you do if you have any recorded unallowable expenditures for ESSER?

- a) Have the supporting Documentation for this expense readily available
- b) Move the expense out of ESSER
- c) If nominal amount, leave as is
- d) Try to tie it to ESSER in any way possible



Answer Key

Question 1: b

Question 2: b

Question 3: c

Question 4: d

Question 5: b

Question 6: e

Question 7: d

Question 8: a

Question 9: c

Question 10: b



Contact/Mission

For more information on the Finishing Strong ARP ESSER and Closeout please visit PDE's website at www.education.pa.gov

The mission of the Department of Education is to ensure that every learner has access to a world-class education system that academically prepares children and adults to succeed as productive citizens. Further, the Department seeks to establish a culture that is committed to improving opportunities throughout the commonwealth by ensuring that technical support, resources, and optimal learning environments are available for all students, whether children or adults.