

Elementary and Secondary School Emergency Relief (ESSER III) Fund

John R. Payne, Deputy Superintendent

May 19, 2021

Molly M. Spearman – State Superintendent of Education

Purpose

- The purpose of these sessions is to provide an overview of the American Rescue Plan (ARP) Act, and specifically the funds provided by it under the Elementary and Secondary Schools Emergency Relief (ESSER III) Fund that will be awarded to school districts as subgrants.

Disclaimer

- This presentation is designed to help you understand state requirements and procedures for the new ESSER III Subgrant.
- This presentation is *not a substitute* for reading the subgrant agreement, all assurances, terms, and conditions, and applicable state laws and federal regulations.

Objectives

- To provide an overview of ESSER III and subgrant requirements
- To understand the ESSER funds including the state's responsibilities as well as districts' responsibilities
- To understand financial and auditing requirements and information about ESSER III funds
- To understand auditing components with ESSER III plans
- To understand your ESSER III Grant Award Notification and other legal requirements

ESSER III Series

- Today's session provides extensive information on the requirements of ESSER III
- Additional technical assistance sessions will be scheduled to provide training on completing the ESSER III Application/Plan and Return to In-Person Plan.
- These sessions will be posted to the ESSER III webpage

ARP GENERAL INFORMATION

ARP Act – General Information

- On March 11, 2021, the American Rescue Plan (ARP) Act was signed into law
- The US Department of Education is providing an additional \$122 billion for the Elementary and Secondary School Emergency Relief Fund (ESSER III Fund)
- USED awarded grants to state educational agencies (SEAs) for the purpose of providing local educational agencies (LEAs) with emergency relief funds to address the impact that COVID-19 has had, and continues to have, on elementary and secondary schools

Two Requirements of ARP Act

Return to In-person Plan

**ESSER III
Application
and Budget**

Know the Differences

Topic	ESSER I	ESSER II	ESSER III
Enacting Legislation	CARES Act	CRRSA Act	ARP Act
Period of Availability	September 30, 2022	September 30, 2023	September 30, 2024
Equitable Services	Required on part of LEA	Required on the part of SEA	Required on the part of SEA
Use of Funds	12 allowable uses of funds	15 allowable uses of funds, new uses include capital improvements and learning loss mitigation	15 allowable uses of funds, LEAs must publish budget and in-person plan online and spend at least 20% on learning loss
Tracking of Funds	ESSER I funds must be tracked separately from II and III	ESSER II funds must be tracked completely separately from I and III	ESSER III funds must be tracked completely separately from I and II

ARP ESSER PLAN REQUIREMENTS

ESSER III – School District Subgrants

- Based on FY21 (Summer 2020) Title I allocations
- South Carolina will receive \$2,112,051,487 in ESSER III funds from the Act
- 90 percent (\$1,900,846,338) will flow through to school districts
- The remaining funds (\$211,205,148) will be used for state-level activities to address issues caused by COVID-19

ESSER III Subgrant Specifics

- Districts are required to complete a new application and plan in addition to submitting a budget, GEPA statement, and signed GAN for ESSER III funds
- Districts are **NOT** required to use any ESSER III funds for Equitable Services to non-public, non-profit schools
- The ESSER III grant extends until **September 30, 2024**

ESSER Funds – Subgrant Specifics

- Funds cannot be used on
 - Subsidizing or offsetting executive salaries and benefits of individuals who are not LEA employees, or
 - Expenditures related to state or local teacher or faculty unions or associations
 - Supplement not Supplant does not apply to these funds; however, districts should ensure that the funds are spent on activities related to, caused by, or impacted by COVID-19 pandemic

Learning Loss, cont'd

- LEAs must reserve **at least 20%** of their total allocation to address learning loss
- LEAs ESSER III learning loss activities should align or duplicate the LEAs Academic Recovery Plans

Learning Loss, cont'd

- The ESSER III plan must include:
 - How the LEA will use funds to address the academic impact of lost instructional time using evidence-based interventions
 - How the LEA will ensure that the interventions respond to the social, emotional and academic needs of all students
 - How the LEA will ensure the interventions it implements addresses students' needs

Learning Loss, Cont'd

- The plan should address students disproportionately impacted by COVID-19 including:
 - Students from low-income families
 - Students of color
 - English learners
 - Children with disabilities
 - Students experiencing homelessness
 - Children in foster care
 - Migratory students

Other Allowable Uses of Funds

1. Any activities authorized under ESSA
 - a) IDEA
 - b) Adult Education and Family Literacy Act
 - c) Perkins Act
2. Coordinate emergency response
3. Address needs of highly vulnerable populations
4. Ensure preparedness and coordination (systems & procedures)
5. Training related to infectious diseases
6. Purchase cleaning supplies to sanitize and clean schools
7. Planning/coordinating for continued education

Other Allowable Use of Funds, cont'd

8. Purchase education technology
9. Mental health supports
10. Summer learning
11. Learning loss
12. Facility repairs and improvements
13. Improving indoor air quality
14. Developing strategies and implementing public health protocol
15. Other activities necessary for maintaining services and instruction

Detailed descriptions online at <https://ed.sc.gov/policy/federal-education-programs/esser-funding-information/esser-iii-funding-information/>

Facilities and Indoor Air Projects

- Provide detail in ESSER III plan and budget
- SCDE needs to determine the alteration level (Level 1 through 3)

Facilities and Indoor Air Projects, cont'd

- Special Considerations:
 - Justify it is *to prevent, prepare for, and respond to COVID-19*
 - Costs must be reasonable
 - Davis-Bacon rules apply
 - Cannot claim funds in this category until full approval from SCDE OSF
 - Must follow EDGAR requirements on construction

Office of School Facilities Approval

1. ESSER staff forwards plans with categories 12 & 13 budgeted to OSF staff for review
 - i. OSF reviews to determine sufficiency of information
 - ii. ESSER staff as applicable contacts district for additional information if needed
 - iii. OSF staff determines if the request is routine or non-routine maintenance
2. Routine Maintenance
 - i. No additional requirements from the SCDE
3. Non-Routine Maintenance
 - i. Districts will have to follow OSF procedures with submitting a plan for facility repairs and improvements

Building Codes

- Level 1 Alteration: The removal and replacement of the **covering** of existing materials using new materials that serve the same purpose
- Level 2 Alteration: Reconfiguration or extension of any space/system, addition or elimination of any door or window, or the installation of any additional equipment
- Level 3 Alteration: A level 1 or level 2 alteration where the work area exceeds 50% of the building area (includes new construction)
- Routine Maintenance: Changing air filters, painting, etc.

New Category 14

- Developing strategies and implementing public health protocols including, to the greatest extent practicable, policies in line with guidance from the Centers for Disease Control and Prevention for the reopening and operation of school facilities to effectively maintain the health and safety of students, educators, and other staff.

Prevention and Mitigation Strategies

Districts must describe the extent to which and how the funds will be used to implement prevention and mitigation strategies that are, to the greatest extent practicable, consistent with the most recent CDC guidance on reopening schools, in order to continuously and safely open and operate schools for in-person learning.

ESSER III Plan Public Input

- Must engage in meaningful consultation with stakeholders
- Must give the public an opportunity to provide input during the development of the plan
- Approved ESSER III plan must be posted publicly on the district's website

ESSER III Plan Public Input, cont'd

- Must consult with:
 - Students
 - Families
 - School and district administrators (including special ed)
 - Teachers
 - Principals
 - School leaders
 - Other educators or school staff
- If applicable, must consult with civil rights organizations and stakeholders representing student subgroups

RETURN TO IN-PERSON PLAN

Return to In-Person Plan

- LEAs must publish a plan online for safe return to in-person instruction and continuity of services by **June 24, 2021** (within 30 days of receiving GAN)
 - Must get public input
 - Must take public input into account
 - Template will be available for download on the ESSER III webpage

Return to In-Person Plan, cont'd

- Previous plan is allowable if
 - Plan is posted publicly, meets all requirements, and stakeholders have provided input
- LEAs must post plan on LEA website and allow for public input

Return to In-Person Plan, cont'd

- LEAs must review and as appropriate revise the plan every six months at minimum
- LEAs should take into consideration significant changes to CDC guidance to opening schools in revisions
- The revised plan must address and describe any LEA adopted policies

OTHER REQUIREMENTS AND TIMELINE

Other Requirements

- Maintenance of Equity
 - Sec 2004(c) of ARP
- Reporting requirements, including:
 - Mode of instruction
 - Uses of funds to meet needs, particularly by subgroup
 - Opportunity to learn data
 - Impacts and outcomes by subgroup
 - Student data (by subgroup) on COVID-19 impact
 - Jobs created/retained by type
 - Participation rates in ESSER III-funded activities

Timeline and Process Flow

May 24, 2021:

- Subawards and Assurances will be sent to LEAs

June 24, 2021:

- Deadline for LEAs to make reopening plan publicly available

August 24, 2021:

- ESSER III application due for review and approval



Budget Approval, Reimbursement and Reporting Procedures Specific to ESSER III Subgrant

Steven Strother, Finance Director
Office of Finance

Molly M. Spearman – State Superintendent of Education

Managing ESSER III Subgrant

- Important changes for using Grants Accounting Processing System (GAPS)
- Reporting Requirements

Grant Award Notification (GAN) Must Be Fully Executed

Superintendent has to:

- sign subaward GAN
- return signed GAN to scesser@ed.sc.gov
- retain copy (both signatures) for records

Setting up Budget in GAPS

- Budgets for all sub-recipients will be available in GAPS on May 24, 2021.
- Sub-recipients are not required to enter budget on May 24, 2021 however, the budget must be entered in GAPS within 90 days of availability.

Spending Plan Budget Summary

LEA Name:

Use of Funds Budget Summary

	Object	Salaries	Employee Benefits	Purchased Services	Supplies & Materials	Capital Outlay	Other	Indirect Costs	Total
Function	Code	100	200	300	400	500	600	700	
Instruction	100								
Support Services	200								
Community Services	300								
Other Charges	400								

Allocation Amount	Budgeted Amount	Remaining Balance

(Must be \$0.00 for approval)

)

Quarterly Reporting Requirements

Subgrantees must report the following quarterly:

- Amount of subgrant funds expended for each authorized activity at both detail function and object level
- The amount expended is the amount claimed during a reporting period
- Please note that there may be some changes to come in accordance to the US Department of Education reporting requirements and SC General Assembly.

Reporting Due Dates for ESSER III

Reporting Period	Reporting Due Date
April 1 – June 30	July 5
July 1 – September 30	October 5
October 1 – December 31	January 5
January 1 – March 31	April 5

Please notify SCDE if you are not going to meet the reporting deadline.



Revenue Code, Allowability, Time and Effort, and Maintenance of Equity Procedures Specific to ESSER III Subgrant

Nancy Williams, Chief Financial Officer
SC Department of Education

Molly M. Spearman – State Superintendent of Education

Revenue Codes for ESSER III

- Revenue Code: 4974
- Sub Fund: 218

Allowability Requirements

- Costs must be necessary, reasonable and allocable
- Adequately documented
- **PROCEED WITH CAUTION**
- Ask if there are any questions

Time and Effort

- All employees who are paid in full or in part with federal funds must keep specific documents to demonstrate the amount of time they spent on grant activities or cost objectives. (2 C.F.R. Part 200.430(i)(1))
- A personnel activity report (PAR) should be used to track time charged from multiple cost objectives.
- A semi-annual certification can be used to track time that is 100% charged to a cost objective in that period.

Time and Effort Cont'd

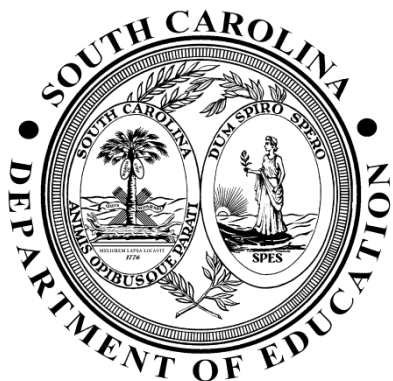
- The district should have an emergency pay policy and procedure that addresses compensation of salaries (including leave) from ESSER I, ESSER II and ESSER III funds.

Time and Effort Reminders

- Have a documented internal control procedure related to time and effort
- Ensure effort certifications are accurate
- Reconcile actual effort to funding source

Maintenance of Equity

- LEA cannot reduce per-pupil funding (from state and local funding) for “high-poverty school” more than total reduction LEA-wide divided by number of students currently enrolled in LEA
- Some exceptions exist for districts with smaller enrollments
- US Department of Education has yet to release guidance



ARP/ESSER III Technical Assistance Training

Melissa Myers

Director, Office of Auditing Services

Molly M. Spearman – State Superintendent of Education

Audits/Documentation Requirements

Audit of ARP/ESSER III

- Based on the risk factors, it is highly likely that the ARP/ESSER III program will be determined to be a major program for many LEAs
- Funds expended prior to June 30, 2021 will be subject to audit during the FY 2020-21 single audits
- OAS audit staff and program staff will also perform fiscal monitoring of district's use of ESSER grant funds

Documentation to Support Expenditures

- Annually, the SCDE Office of Auditing Services issues the “Guidelines for Retaining Documentation to Support Expenditures”

Adequate Supporting Documentation

- Claim for payroll and employee benefits
 - Timesheets
 - Personnel activity reports (PARS)
 - Semi-annual certifications
 - Payroll registers
 - Labor history reports
 - Salary agreement
 - Job description
 - Documentation of benefit rate for each type of benefit (federal and state tax forms, invoices, etc.)

Adequate Supporting Documentation (Cont'd)

- Purchased Services
 - Contractual agreement
 - Period of performance (dates)
 - Detailed description of service(s) to be rendered
 - Contract amount (payment terms)
 - Authorized signatures
 - Invoices to support payments made
 - Timesheets

Adequate Supporting Documentation (Cont'd)

- Supplies
 - Purchase Orders
 - Requisitions
 - Invoices or Receipts
 - Goods receipt
 - Packing slips

Adequate Supporting Documentation (Cont'd)

- Indirect Cost
 - Calculation of indirect cost charged
 - Journal entry to show indirect cost charge
 - Documentation of approved indirect cost rate

Inventory Control

- Like all other federal funds, all capital assets purchased with ESSER III funds must be inventoried
- Low valued technology assets, such as laptops, must also be inventoried

Indirect Costs

What are Indirect Costs?

- Two Criteria
 - They are incurred for a common or joint purpose benefiting more than one cost objective and
 - They are not readily assignable to the cost objectives specifically benefited.

Examples of Indirect Cost Functions

- Accounting
- Auditing
- Budgeting
- Payroll
- Personnel
- Purchasing

Types of Indirect Cost Rates

- Unrestricted – Used for programs without the supplement, not supplant requirement
- Restricted – Used for programs with the supplement, not supplant provision

Type of Indirect Cost Rate – ESSER Funds

- ESSER Funds are not subject to the supplement, not supplant requirement
- The unrestricted rate can be charged to this program; Lower rate can be charged
- Do not double dip! (Charge an expenditure as a direct cost and claim as an indirect cost also)

Resources

- Guidelines for Retaining Expenditure Documentation to Support Expenditures
 - <https://ed.sc.gov/finance/auditing/manuals-handbooks-and-guidelines/guidelines-for-retaining-documentation-to-support-expenditures1/>

Resources

- Indirect Cost Resources
 - <https://ed.sc.gov/finance/auditing/indirect-cost-resources/>



Subaward, Assurances, and GEPA Statement

Audrey Shifflett, Grants Program

Henry Gunter, Office of General Counsel

Division for Legal Services

Molly M. Spearman – State Superintendent of Education

Disclaimer

This presentation is designed to help you understand the ESSER III subgrant award notification, the program-specific assurances, and how to write a General Education Provisions Act (GEPA) statement.

This presentation is *not a substitute* for reading the subgrant award, any program-specific assurances, the SCDE's Assurances and Terms and Conditions for Federal Subawards, and the applicable instructions for developing the school district's GEPA statement for ESSER III funding.

ESSER III Subaward

- New format reflects 2020 revisions to 2 CFR Part 200.332(a)
- New item: Budget Period (defined in

5. Period of Performance:

Start: 3/24/2021 End: 9/30/2024

6. Budget Period:

Start: 3/24/2021 End: 9/30/2024

GAN Section 2 details funds

2. Subaward Information:

Grant Status: New

Grant Number: H63010497521

Subaward Name: ESSER II

Sub Program Number: 01

Award Amount: \$4,017,118.00

Total Amount of Funds Obligated to Subgrantee:
\$4,017,118.00

Total Amount of Funds Committed to Subgrantee:
\$4,017,118.00

District Revenue Code: 4977

District Subfund: 225

Award Amount

(Amount of Federal
Funds Obligated)

Total Amount of Funds
Obligated...

Total Amount of Funds
Committed...

Scope of Work in GAN Section 11

- Allowable uses of funds
- Fund amounts stated (20 percent, remaining 1/3, etc.)
- Requirements (written procedures, disclosing use of funds, domestic preference in procurements, etc.)
- Required actions (reports, retaining documentation, etc.)
- Reporting deadlines

New: 2 CFR Part 322

Domestic Preference for Procurements

“As appropriate and to the extent consistent with law, the subgrantee should, to the greatest extent practicable under a federal award, provide a preference for the purchase, acquisition, or use of goods, products, or materials produced in the United States (including but not limited to iron, aluminum, steel, cement, and other manufactured products).”

More about 2 CFR Part 322

- (1) “Produced in the United States” means, for iron and steel products, that all manufacturing processes, from the initial melting stage through the application of coatings, occurred in the United States.
- (2) “Manufactured products” means items and construction materials composed in whole or in part of non-ferrous metals such as aluminum; plastics and polymer-based products such as polyvinyl chloride pipe; aggregates such as concrete; glass, including optical fiber; and lumber.

One More Thing from 2 CFR Part 322

- “The requirements of this section must be included in all subawards including all contracts and purchase orders for work or products under this award.”
- Item 11.P in ESSER III subaward
- Incorporate into procurement processes
- Include language in contracts and purchase orders.

Know Your ESSER Subgrants

- Distinct federal legislation
- Different – but similar - purposes
- *Must* track each subgrant separately
- May be similar and share characteristics
- Get and stay organized—know specifics of what applies to *each* subgrant

Remember

- Keep district's SAM.gov registration current to continue to receive federal funds (legal requirement)
- Follow best practices for grants management

Best Practices

- “First in, first out”—spend oldest funds first
- “Document, document, document”
- Ensure internal controls are strong
 - Separation of duties
 - Inventory control (especially anything & everything that can “walk”)
 - Routinely review and update policies/procedures

Recommendations

- Adopt the 2020 Model School District Procurement Code (when approved)
<https://procurement.sc.gov/schoolscodes>
- When approved, will supersede 2011 version
- Incorporates significant changes (May 2019) to SC Consolidated Procurement Code and Regulations
- Aligns with federal regulations 2 CFR Part 200

Recommendation: Adopt Model Code

- Aligns with federal regulations
- Provides a written policy/procedures (as required)
- *All school districts* will be subject to federal audit requirement:
 - SC CARES/ESSER I subaward
 - ESSER II subaward
 - ESSER III subaward (in process/pending)
- Will allow district to benefit from new thresholds

Properly Use Federal Procurement Flexibilities

Small purchase procedures and thresholds *will not increase* for district's procurement (use of federal subgrant funds) *without approval* of district's Model Code from Division of Procurement Services of the State Fiscal Accountability Authority (SFAA).

Auditor is Coming



Need for COVID-19 Emergency Policies/Procedures

“the grantee or subgrantee may amend or create a policy in order to put emergency contingencies in place....”

– USED’s Fact Sheet, April 8, 2020

- After-the-fact policy/procedure (backdate to March 13, 2020)
- Auditors will ask for/examine these (low hanging fruit)

Example: Determining Allowability of Costs Procedures

Statement on Determining Allowability of Costs for COVID

- Procedure for determining whether to spend federal grant funds
- Required by 2 CFR Part 200 (written procedure)
- Retroactive to March 13, 2020 (National emergency declaration)

Other Affected Policies and Procedures

- Allowability Procedures – 2 CFR Part 200.302(b)(7)
- Managing Equipment – §200.313(d)
- Travel Policy - §200.474(b)
- Time and Effort Procedures
- Record Retention Procedures

Note: review SCDE's Assurances and Terms and Conditions for Federal Subawards for state requirements for time and effort reporting.

Prioritize!

- If your school district has already completed emergency procedures, congratulations! 😊
- If not, prioritize this (auditors coming and they'll ask for your written procedures)

May 3, 2021 2 CFR Frequently Asked Questions

The federal Office of Management and Budget (OMB) released a [new Frequently Asked Questions \(FAQs\)](#) to address questions about recent updates to Title 2 of the Code of Federal Regulations (CFR), including 2 CFR Part 200

Q-11 “Are recipients required to update their policies to account for the revisions (e.g., procurement thresholds or subrecipient monitoring requirements) by the effective date?”

OMB's Answer

“The revisions are effective for federal awards made on or after November 12, 2020. Unless otherwise noted, recipients must update their internal policies to reflect the changes in the Uniform Guidance upon accepting a federal award made on or after the effective date (November 12, 2020).”

Start Updating Procedures for New Fiscal Year

- Changes in 2 CFR Part 200 require updates to operating policies and procedures
- New fiscal year/next auditing cycle
- Redline document:
https://trumpadministration.archives.performance.gov/CAP/20200812-2-CFR-Revision-Redline_Final.pdf

Promises to keep...

ESSER III ASSURANCES

Haste

“...to make a significant portion of emergency relief funds under section 2001 of the ARP available as quickly as possible...”

March 24 – 2/3 of state’s grant award to SCDE

May 24 – 2/3 of subaward to LEA (pass-through)

ESSER III subgrant is not...

Free money!

Has “strings
attached”
called
Assurances!



Two Types of Assurances



Elementary and Secondary School Emergency Relief Fund (ESSER) III American Rescue Plan (ARP) Act of 2021

Assurances and Terms and Conditions for Federal Subawards
Effective date: 1/4/2021

Assurances and Terms and Conditions for Federal Subawards



Elementary and Secondary School Emergency Relief Fund (ESSER) III American Rescue Plan (ARP) Act of 2021 Program-Specific Assurances

Program-Specific Assurances

ESSER III Program-Specific

- 5 Assurances
- [American Rescue Plan \(ARP\)](#)
- Separate document to submit
- Superintendent and Financial Official to sign and date

Assurance 1

I certify that

- this local educational agency (LEA) will use American Rescue Plan Elementary and Secondary School Emergency Relief Fund (ARP ESSER) funds for activities allowable under section 2001(e) of the [ARP](#).

Assurance 2

I certify that

- this LEA will comply with the maintenance of equity provision in **section 2004(c)** of the [ARP](#).

Assurance 3

I certify that

- this LEA will reserve not less than 20 percent of its total ARP ESSER allocation to address learning loss through the implementation of evidence-based interventions, such as...

Assurance 3, continued

- summer learning or summer enrichment,
- extended day,
- comprehensive afterschool programs,
- extended school year programs, or
- other evidence-based interventions,
and...

Assurance 3 concludes

...ensure that such interventions respond to students' academic, social, and emotional needs and address the disproportionate impact of COVID-19 on student subgroups

(each major racial and ethnic group, children from low-income families, children with disabilities, English learners, gender, migrant students, students experiencing homelessness, and children and youth in foster care).

Assurance 4

I certify that

- this LEA will either:
 - a) within 30 days of receipt of ARP ESSER funds, develop and make publicly available on the LEA's website a plan for the safe return of in-person instruction and continuity of services as required in section 2001(i)(1) of the ARP, or
 - b) develop and make publicly available on the LEA's website such a plan that meets statutory requirements before the enactment of the ARP.

Assurance 4, continued

This LEA will, as required in section 2001(i)(2) of the ARP, before making the plan publicly available, have sought public comment on the plan and took such comments into account in the development of the plan.

Assurance 5: Reporting

I certify that

- this LEA will comply with all reporting requirements at such time and in such manner and containing such information as the Secretary may reasonably require, including on matters such as:

Assurance 5, continued

- how the LEA is developing strategies and implementing public health protocols including, to the greatest extent practicable, policies and plans in line with the CDC guidance related to addressing COVID-19 in schools;

More in Assurance 5

- overall plans and policies related to the LEA's support for return to in-person instruction and maximizing in-person instruction time, including how funds will support a return to and maximize in-person instruction time, and advance equity and inclusivity in participation in in-person instruction;

Assurance 5 continues further

- data on each LEA's mode of instruction (remote, hybrid, in-person) and conditions;
- LEA uses of funds to meet students' social, emotional, and academic needs, including through summer enrichment programming and other evidence-based interventions, and how they advance equity for underserved students;

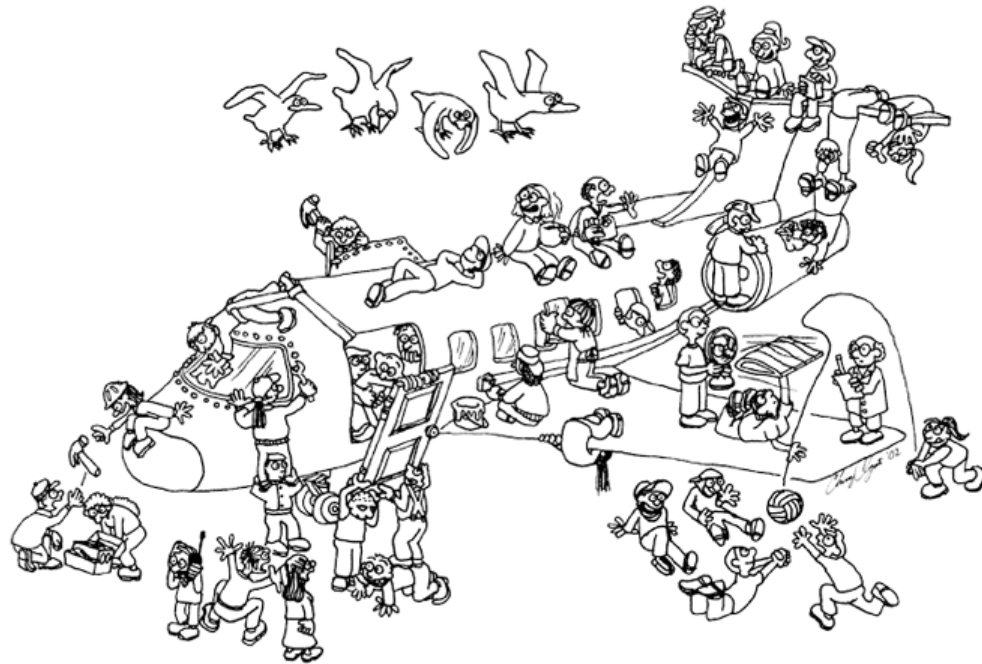
More “Such As” in Assurance 5

- LEA uses of funds to sustain and support access to early childhood education programs;
- impacts and outcomes (disaggregated by student subgroup) through use of ARP ESSER funding (e.g., quantitative and qualitative results of ARP ESSER funding, including on personnel, student learning, and budgeting at the school and district level);

Assurance 5 concludes

- student data (disaggregated by student subgroup) related to how the COVID-19 pandemic has affected instruction and learning;
- requirements under the Federal Financial Accountability Transparency Act (FFATA); and
- additional reporting requirements as may be necessary to ensure accountability and transparency of ARP ESSER funds.

Building the Plane as We're Flying it



leadershipfreak.blog

As Required by Section 427 of the General Education Provisions Act (GEPA)

GEPA STATEMENT

For Federal Education Subawards, Applicant

Must “include in its application a description of the steps the applicant proposed to take to ensure equitable access to, and participation in, its federally-assisted program for students, teachers, and other program beneficiaries with special needs.”

Benefit of GEPA Statement

“...allows applicants discretion in developing the required description.”

- Should be based on local circumstances

6 Barriers to Equitable Access/Participation

- Gender
- Race
- National origin
- Color
- Disability
- Age

GEPA Statement

- Create a statement that
 - Identifies at least one barrier that would prevent someone from participating in ESSER III subgrant-funded activities
 - Explains what will be done to overcome the barrier.
- Must align with proposed uses of funds/activities

One More Thought

- Lookout for fraud
- If you believe fraud is occurring, contact the SC Office of Inspector General
 - <https://oig.sc.gov/file-complaint> (online form)
 - 1-855-SCFRAUD (1-855-723-7283)

Additional Resources

- ESSER III Webpage: <https://ed.sc.gov/policy/federal-education-programs/esser-funding-information/esser-iii-funding-information/>
- USED ARP
Webpage: <https://oese.ed.gov/offices/american-rescue-plan/american-rescue-plan-elementary-and-secondary-school-emergency-relief/>
- ESSER I Webpage: <https://ed.sc.gov/policy/federal-education-programs/esser-funding-information/>
- ESSER II Webpage: <https://ed.sc.gov/policy/federal-education-programs/esser-funding-information/esser-2-funding-information/>

Questions?

- Please email the scesser@ed.sc.gov email account