For information on <u>general state funding</u> issues please see the *General State Funding FAQ* located on the [TEA Coronavirus webpage under Funding and Waivers.](#)

For information on <u>ADA, attendance, instructional minutes and enrollment</u>, please see the *Enrollment and Attendance FAQ* located on the [TEA Coronavirus webpage under Funding and Waivers](#).

For information on <u>FEMA-related questions</u>, please see the **FEMA FAQ** located on the [TEA Coronavirus webpage under Funding and Waivers](#).

For information on <u>CARES ACT</u>, please see the **CARES ACT Funding and Documentation FAQ** located on the [TEA Coronavirus webpage under Funding and Waivers.](#)

For information on the **CRF LEA Reimbursement Program**, please see the Guidance on TDEM's website at <u>https://tdem.texas.gov/crf/</u>. **Updated July 28, 2020**

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Flexibility and Waivers

1. **What if I had expenses associated with my federal grant for services that were cancelled but where certain fees are still charged (travel/conferences/etc.)?** **Updated April 14, 2020**

Provided that a subgrantee first seeks to recover nonrefundable costs (e.g., travel, registration fees) associated with a federal grant from the relevant entity that charged the fee (e.g., airline, hotel, conference organizer) grant funds may be used to reimburse unrefunded costs.

Some businesses are offering flexibility with regard to refunds, credits, and other remedies for losses due to the COVID-19 outbreak. Many agreements or contracts for conferences, training, or other activities related to a grant contain a force majeure or emergency provision, and the subgrantees must seek to exercise those clauses to the extent possible in light of the COVID-19 outbreak.

If a subgrantee is unable to recover the costs, the subgrantee may charge the appropriate grant for the cancellation costs, provided the costs were reasonable and incurred in order to carry out an allowable activity under the grant, consistent with the federal cost principles described in 2 CFR Part 200 Subpart E of the *Uniform Administrative Requirements, Cost Principles, And Audit Requirements For Federal Awards* (Uniform Guidance).

Subgrantees should not assume additional funds will be available should the charging of cancellation or other fees result in a shortage of funds to eventually carry out the event or travel. Subgrantees must maintain appropriate records and cost documentation as required by 2 CFR § 200.302 (financial management) and 2 CFR § 200.333 (retention requirements for records) to substantiate the charging of any cancellation or other fees related to the interruption of operations or services.

2. **Is TEA requesting flexibility or waivers from the Feds on federal funding awards?** **Updated April 21, 2020**

TEA received **approval from USDE** on April 10, 2020, for the following waivers:
 - Title I, Part A Carryover Limitation – SY 2019-2020 Title I, Part A funds that become carryover into SY 2020-2021 on October 1, 2020, will be allowed a general waiver to carryover more than the statutory 15%.
 - Period of Availability – SY 2018-2019 federal grant funds listed below, that would have ended September 30, 2020, are granted a one-year extension on the life of the funding. These funds will now be available until September 30, 2021:
     - ESSA, Title I, Part A Improving Basic Programs
     - ESSA, Title I School Improvement (Section 1003)
     - ESSA, Title I, Part B State Assessment Grant
     - ESSA, Title I, Part C Migrant
     - ESSA, Title I, Part D, Subpart 1 Neglected, Delinquent, State Agency Programs
     - ESSA, Title I, Part D, Subpart 2 Neglected, Delinquent, and At-Risk Programs
     - ESSA, Title II, Part A Teacher and Principal Training and Recruiting Programs
     - ESSA, Title III, Part A English Language Acquisition
     - ESSA, Title IV, Part A Student Support and Academic Enrichment Grants
     - ESSA, Title IV, Part B 21st Century Community Learning Centers
     - ESSA, Title V, Part B, Subpart 2 Rural and Low-Income Schools Program
     - McKinney-Vento Education for Homeless Children and Youth
 - ESSA, Title IV, Part A needs assessment requirement for SY 2019-2020. This waiver allows LEAs to address newly identified needs without the need to revise their needs assessment.
 - ESSA, Title IV, Part A three content area spending set-aside requirements for SY 2019-2020 (including carryover from SY2018-2019). This waiver allows LEAs to expend grant funds as needed.

➢ ESSA, Title IV, Part A limitation on technology infrastructure costs. This waives the 15% limitation and allows LEAs to expend grant funds as needed.
➢ ESSA definition of professional development for SY 2019-2020. This waiver ensures online or virtual training is allowable under ESSA grant funding.

TEA will implement these waivers for all subgrantees as long as the two assurances below are met by the subgrantees:

- Subgrantees ensure they will use funds under the respective ESSA programs in accordance with the provisions of all applicable statutes, regulations, program plans, and applications not subject to these approved waivers.
- Subgrantees ensure they will work to mitigate any negative effects, if any, that may occur as a result of these approved waivers.

On April 9, 2020, TEA submitted a broader waiver request to USDE under the Secretary's ESSA waiver process. USDE has provided a preliminary response to the following waivers that were **requested**:

- Period of Availability of all federal fiscal year 2018 education grant funds ending September 30, 2020, to September 30, 2021, and all federal fiscal year 2019 education grant funds ending September 30, 2021, to September 30, 2022. This waiver is broader than the USDE expedited waiver and would apply to the State and all eligible subrecipients to provide no-cost extensions to extend the "life" of the funds for an additional year. This will allow the state and eligible LEAs to have more time to expend these funds to meet newly identified needs.
  - ➢ On Friday, April 17, 2020, USDE indicated that each office in USDE will address individual flexibility and waivers. As of now the approved waivers for 2018-2019 ESSA programs listed above, and a new waiver for Perkins that is being offered, are the only period of availability waivers that USDE has offered. A waiver for IDEA is expected to be offered soon.
  - ➢ USDE also indicated that a waiver to extend the period of availability for SY 2019-2020 funds will not be considered at this time, since those funds have a life til September 30, 2021 already.
- Extend the Liquidation Period for obligations made during the award period for all federal fiscal year 2018 education grant funds ending September 30, 2020, for the State and all its eligible LEAs affected by COVID-19. This waiver would extend the amount of time eligible LEAs had to liquidate federal grant funds for obligations made during the grant period. This would allow eligible LEAs to have more time to receive goods and services that have been interrupted by the pandemic and resulting closures.
  - ➢ On Friday, April 17, 2020, USDE indicated that this waiver would be taken care of in the official approval of the expedited waivers above.
- Allowability of uses of federal funds regulations prohibiting subrecipients from paying for services not received. This would allow subrecipients to use federal grant funds to pay for activities and services that were properly procured and then cancelled due to COVID-19 without refunds to the subrecipient. This could include items such as restocking fees when items could not be delivered to the LEA due to closure.

> ➢ On Friday, April 17, 2020, USDE indicated this waiver would require additional conversation, but felt it may not be needed due to flexibility already offered.

On April 21, 2020, TEA received Period of Availability waiver **approvals from USDE** granting a one-year extension on the life of 1) the SY 2018-2019 federal Perkins CTE grant that would have ended September 30, 2020, and 2) the 2018 Restart grant that would have ended April 26, 2020. These funds will now be available until September 30, 2021.

3. **What types of flexibility are available for federal funding?** Updated April 14, 2020

USDE has just begun issuing federal flexibility in the past week and will continue to release flexibility on an ongoing basis.

See the prior questions under Flexibility and Waivers, question 1 under Salary Compensation, and question 3 under Uses of Grant Funds for flexibility issued from USDE.

4. **Will there be any flexibility to federal EDGAR regulations around procurements, such as price quotes or competitive processes?** Posted March 27, 2020

There may be flexibility moving forward, but it is uncertain at this time. TEA is requesting waivers of EDGAR related requirements from USDE. Remember that districts have some flexibility in this area within their local policies and procedures, such as internet searches are allowable for getting price quotes if the search result is documented, and your local procedures allow for internet quotes. If your local procedure does not allow for internet quotes, the federal regulations allow for you to revise your local procedures as needed.

5. **Does the Title IV, Part A limitation on technology infrastructure apply to COVID-19 related purchases of technology such as internet hot spots? If yes, can this requirement be waived?** Posted April 14, 2020

The Title IV, Part A technology infrastructure limitation has been waived. See question 2 under Flexibility and Waivers for more information.

6. **Any discussion on whether IDEA MOE will be addressed with the potential extra expenditures during and following the pandemic?** Posted April 21, 2020

TEA has asked USDE for flexibility and guidance; however, IDEA-B LEA MOE compliance is measured against the prior year's expenditures. The MOE compliance that might potentially be impacted will be calculated in Spring 2021. We expect USDE will say that decisions will be made later after we learn more of the full impact the pandemic has on LEAs. For now, focus on doing what is best for students.

7. **Is the Title IV, Part A technology waiver and the waiver for the three areas of allocation extending into 2020-2021 or does this last only until the end of fiscal year 2020?** Posted April 30, 2020

As currently approved, the waivers from USDE are for School Year 2019-2020 Title IV, Part A funding only.

8. **Now that the waiver for Title IV has been approved there have been questions from districts about how to amend the application. When they try to amend the application, it will not allow them to put more that 15% in the technology infrastructure line or put all the funds in one of the three areas as the waiver now allows. How do they complete the amendment?** Posted April 30, 2020

The eGrants programmers are working to adjust the schedule so that the LEAs can amend. TEA will update this response when that new functionality is available.

9. **Is the 15% carryover limitation on ESSA, Title I School Improvement (Section 1003) grant funds waived for this year?** Posted June 18, 2020

The 15% carryover limitation does not apply to Section 1003 funds so the waiver is not applicable.

Carryover and Application Issues

1. **Will there be exceptions for carry over amounts for Title funds and grants?** Updated April 14, 2020

See question 2 under Flexibility and Waivers for the list of waivers approved by USDE. The Title I, Part A 15% limitation on carryover has been waived as described above.

For grants that do not have statutory carryover limitations, TEA has flexibility to allow higher percentages than normal.

2. **Do you expect current federal grant allocations to change due to COVID-19?** Updated April 21, 2020

Current year federal grant allocations are already allocated and awarded (NOGAs have been issued). It would take federal statute to change the current year allocations.

School year 2020-2021 allocations have not been calculated, but there are no significant changes in the preliminary data received from USDE as of March 27th except for the Migrant Education Program. The ESSA statutory hold-harmless provision in the Migrant formula expires at the end of the 2019-2020 school year. The allocation of Migrant funding to the state is decreasing approximately 38% due to this formulary change. The reduction is not related to COVID-19.

3. **Will amendments be needed for the LOI or competitive grants, such as the Autism grant, or other noncompetitive grants where the grantee is not able to complete planned activities?** Posted April 14, 2020

Any time grant recipient is revising the scope or objectives of the grant, an amendment is needed. An associated budget amendment may also be required. However, TEA program offices may have flexibility to make some changes for grantees through the errata process. Check for any erratum and refer to the *When to Amend* guidance on the TEA Grants web site for further information.

4. **What potential impact will school closures have on federal grant applications?** Posted March 27, 2020

LEAs will receive all flexibilities available to TEA in the use of their federal grant funds. Information on stimulus funding for education is expected in the next 30 days to address COVID-19 needs; therefore, we do not anticipate significant changes to how you expend your current federal grant funds unless the needs of your students and school communities change.

After you update your comprehensive needs assessment, you may consider changes to the planned uses of your federal grant funds. Refer to the When to Amend guidance document and submit amendments (by email or eGrants only) when necessary.

5. **With the flexibility being provided due to COVID-19, do we have the flexibility to amend federal grant applications to purchase technology items so that instruction can be provided to students in a virtual setting, including summer school?** Posted April 14, 2020

Yes, federal grant applications may be amended, as needed, to reflect changing needs as a result of coronavirus. Also, remember districts already have an allowable 25% variance between open class-object codes within their grant budget if they are not adding items that require specific approval and the new items are allowable with the grant guidelines. Refer to the *When to Amend* grant guidance document for more information.

6. **If schools set goals around improvement on STAAR how does that affect how they respond to questions regarding meeting SC3001 SMART goals?   There may also be more schools that do not expend at least 90% of their planned budgets as indicated on the SC3001.** Posted April 14, 2020

Reporting on PR3001 will be suspended for SY 2019-2020 and the SC3001 will be suspended for SY 2020-2021. LEAs should focus on meeting the needs of students at this time, and not be concerned about goals set in SC3001 and data collection in PR3001.

7. **What information is available regarding the continued availability of IDEA-B grant funding for the current school year? Is it reasonably assumed that the funds we were granted for the current school year will remain available for use as intended in our grant applications?** Posted April 14, 2020

Yes. Current year federal grant entitlements are already allocated and awarded (NOGAs have been issued) to LEAs. It would take federal statute to change the current year allocations. We do not anticipate any changes to current year grant awards.

School year's 2020-2021 IDEA allocations have not been calculated, but there are no significant changes in the preliminary data received from USDE as of March 27th.

8. **Will carryover funds be reallocated in November/December like in the past, or will LEAs be able to utilize those funds continuously without any wait time for them to be re-allocated to the LEA? Posted June 4, 2020**

For ESSA grant programs under the USDE period of availability waiver, the extensions (described in question 5 of the Grant Extensions Section above) of the 2019-2020 ESSA grant application end date gives the LEA continuous access to the funds for the full 27-month period of availability for the 2019-2020 funds and there will be no carryover process in the fall for the 2019-2020 ESSA grant funds.

For other federal grant programs, 2019-2020 carryover into 2020-2021 cannot be calculated until after the LEA submits its Final Expenditure Report after the grant ends September 30, 2020. TEA calculates and issues the carryover funds with the maximum allocation in the November/December timeframe; however, the LEA has always had the ability to estimate its carryover and charge against those funds locally until they receive a NOGA with the maximum allocation**.**

9. **What is the amendment process to make changes to a grant application? Posted April 21, 2020**

Subgrantees are permitted to make certain changes to the approved budget without a written amendment. However, some changes do require the prior written approval of TEA through an amendment. You may refer to the When to Amend the Application and/or contact the grant negotiator assigned to your ESC region to assist in determining if an amendment is required.

How to Submit Amendments
For "paper" PDF grants, the following pages are required to be submitted for an amendment:
- *Applicant Information* page with up-to-date contact information and current authorized official's signature and date
- *Amendment Description and Purpose* page with changes identified and briefly described
- *Budget Summary* with changes to the budget included
- All other amended pages of the application affected by the change(s) described on the *Amendment Description and Purpose* page.

Submit noncompetitive paper grant amendments to grantapplications@tea.texas.gov
Submit competitive paper grant amendments to competitivegrants@tea.texas.gov
Submit LOI paper grant amendments to loiapplications@tea.texas.gov

For eGrants applications, the subgrantee must submit GS2900 – Purpose of Amendment, and any additional schedules affected by the proposed change are required to be submitted electronically using the eGrants system.

Amendment Deadlines
Amendments should be submitted by the Last Amendment Due Date as identified for the grant program on the Grant Opportunities page.   Amendments submitted after the deadline will be considered on a case-by-case basis if the amendment is allowable by program statute or regulation.

Amendment Review Process
Amendments are subject to review and negotiation. An amendment, after being approved by TEA, is considered effective on the date it was received by TEA in substantially approvable form.

Once the amendment is approved, subgrantees will receive an email containing the amended NOGA, Supplement to NOGA, and final negotiated amendment. The email will be sent to the superintendent as listed in AskTED, or the authorized official as identified on page one of the application, along with the primary and secondary contacts listed on page one of the application.

For More Information on Amendments
Additional details regarding the amendment process are fully described in the Amending the Application section of the General and Fiscal Guidelines. For further information, you may contact the grant negotiator assigned to your ESC region.

Required Documentation

1. **What documentation will we need to receive reimbursement? Updated April 21, 2020**

Please see question four on the **Coronavirus Costs and CARES Act Funding and Documentation FAQ** document on the TEA Coronavirus webpage under Funding and Waivers.

2. **Are the time and effort documentation requirements for federally funded staff any different when the organization is closed and requiring teleworking from federally grant funded staff? Posted March 27, 2020**

No, the staff should follow the same time and effort documentation procedures as normal.

3. **How do federally funded, split-funded hourly wage staff document their time and effort while schools are closed, and the staff are at home? Posted April 14, 2020**

Per federal regulations, as long as the LEA has a documented funding neutral local compensation leave plan/policy that is applied consistently to local, state, and federal activities, the costs are

allowable. Based on this plan or policy, the LEA may continue to pay federally funded staff with federal grant funds consistent with how they are paying state or locally funded staff.

Those staff should maintain the same type of time and effort documentation as normal. If that is not possible, the LEA could consider paying the split time based on an average of the last three months documented time and effort records. If an alternative method, such as a three-month average is used, the LEA needs to adopt a policy if it hasn't already.

4. **How will the LEA document extra-duty pay for tutors, i.e., teachers outside their normal contracted hours, and tutors at participating private nonprofit schools, when student sign-in sheets are not available?** **Posted April 21, 2020**

To the extent possible the employee will maintain the same documentation as before. Since sign-in sheets will not be available the LEA may substitute other methods of documenting who was in attendance. TEA will be flexible in compliance reviews if you document your circumstances and try to meet the intent of the law as best as you can at the time.

Extensions for Grants

1. **What specific grant programs do the application deadline extensions announced by the Department of Grant Compliance and Administration apply?** **Posted March 27, 2020**

All state-funded and federally funded grants from TEA are issued out of the Grants Administration Division within the Department of Grant Compliance and Administration. The application extensions announced apply to all state- and federally funded grants issued by TEA.

2. **Will grants with project end dates between now and September 2020 receive extensions to the end dates?** **Updated April 21, 2020**

The programs listed in question 2 of the Flexibility and Waivers section above have been granted a one-year extension for the 2018-2019 funds that would have ended September 30, 2020.
- Formula grant programs under these fund sources will automatically have the NOGAs extended and the subgrantees will receive an amended NOGA by email reflecting the new end date.
- State level projects funded with 2018-2019 ESSA funds will be reviewed to determine which projects can extend the end dates to June 30, 2021. These project subgrantees will be notified if the NOGA is extended.

As soon as NOGAs have been updated and project end dates are extended, TEA will post a list of those grants and end dates in this FAQ.

3. **Due to schools being closed because of COVID-19, will there be an extension to spend funds from the Carl D. Perkins Grant?** **Updated April 24, 2020**

It will take Congressional action to waive the twelve-month requirement for LEAs to expend the funds. We are told that such a Congressional waiver is being considered. More information will be shared if a waiver is approved.

4. **Could you please clarify if the Texas Title I Priority Schools Grant, Cycle 5 scheduled to end 7/31/2020 (funded by PL 107-110 Section 1003g) is granted a one-year extension under the USDE waiver?** Posted April 30, 2020

No. TTIPS is funded under old NCLB funding and is not part of the USDE waiver. However, TEA is reviewing other flexibility to determine if an extension is possible.

5. **How and when will the ESSA grant application end dates be extended?** Posted June 4, 2020

The Grants Administration Division is working to extend the end dates of the ESSA grant programs covered by the USDE waiver. The 2018-2019 grants (the funds actually extended by the waiver) are closed and any available carryover is in the 2019-2020 grant that is currently open.

To extend the 2018-2019 funds, we are extending the 2019-2020 grant application end date to 9/30/2021. This will cause the LEA to have two grants (2019-2020 and 2020-2021) running concurrently through 9/30/2021 and serving the same time period (July 1, 2020, through September 30, 2021).

6. **Is it true to say that the new 2020-2021 CIPs that we create will serve as appropriate documentation for either the 2019-2020 grants or the 2020-2021 ESSA grants that are being extended and will run concurrently, as long as both sets of grants are serving the same population for the same purpose.** Posted June 4, 2020

Yes, the 2020-2021 Campus Improvement Plan and the 2020-2021 ESSA application program schedules will guide the use of ESSA funds for school year 2020-2021, regardless of whether the LEA is charging the expense to the 2019-2020 grant or the 2020-2021 grant. The LEA must remember to draw down all the 2019-2020 grant funds as soon as possible to prevent the lapsing of any 2018-2019 carryover funds remaining in the 2019-2020 grant.

7. **Do the 2019-2020 grant funds need to be fully expended before the first 2020-2021 drawdown? What if the 2019-2020 grant only has funds budgeted in supplies in materials but do not have any funds budgeted in payroll? Is it going to be acceptable to draw down payroll costs charged to the 2020-2021 grant before the 2019-2020 supplies budget is fully expended?** Posted June 4, 2020

The 2019-2020 funds are not required to be fully expended before the LEA begins spending the 2020-2021 grant funds, but the LEA must remember to draw down funds from the 2019-2020 grant first to prevent the lapsing of any 2018-2019 carryover funds remaining in the 2019-2020 grant.

In the example, the LEA would have two options. You can amend the 2019-2020 budget to move the funds where you need them to access them early in the 2020-2021 school year, OR you can draw down from 6300 in the 2019-2020 grant and from 6100 in the 2020-2021 grant. Either way you need to ensure you draw down funds from the 2019-2020 grant first to prevent the lapsing of any 2018-2019 carryover funds remaining in the 2019-2020 grant. In January 2021, TEA will notify any grantees that still have unexpended 2018-2019 carryover funds in the 2019-2020 ESSA grants.

8. **How will carryover work for the 2019-2020 ESSA grant funds? Posted June 4, 2020**

There will be no carryover process for the 2019-2020 grant funds. With the extension of the end of the 2019-2020 grant application to September 30, 2021, you are receiving the full 27-month period of availability of the grant funds now rather than the grant ending in September 2020 and having to wait for the carryover process in the fall to add them to your 2020-2021 grant application.

9. **Will the 2020-2021 ESSA grant funds be extended next year like the 2019-2020 funds are being extended? Posted June 4, 2020**

No, it is not expected to be needed. However, we will reevaluate the situation next spring.

10. **My LEA currently operates as an independent project for 2019-2020. How can my LEA join a Shared Services Arrangement (SSA) in 2020-2021 if the 2019-2020 grant will stay open until 9/30/21? Posted June 4, 2020**

If you would like to join an SSA in 2020-2021 and you are currently an independent project, you can contract with the fiscal agent to provide services for the remainder of the 2019-2020 grant period. You will need to decide on a date when the contract begins, the services that will be provided, and the amount of funds that will go into the contract. You can contact the Grants Administration Division at grants@tea.texas.gov for more details on this process. For 2020-2021, you will need to indicate on the Applicant Designation and Certification (ADC) form that you plan to join an SSA.

11. **My LEA is currently in an SSA for 2019-2020 but plans to apply for funds independently for 2020-2021. How will I access my carryover funds if the 2019-2020 grant will stay open until 9/30/21 and no carryover process will occur? Posted June 4, 2020**

If the written SSA agreement between your LEA and the fiscal agent specifies that you will take your carryover with you when you leave the SSA, then you will need to contact the SSA and let them know that you will be applying independently for 2020-2021. The SSA will contact the Grants Administration Division and indicate the amount of the carryover from its remaining funds that will need to be moved to the departing LEA's 2020-2021 grant allocation. TEA staff will ensure that these funds are added to the LEA's grant by November or December 2020.

12. **Since the 2019-2020 ESSA grants will stay open until 9/30/21, do we need to amend the SC5000 for Title I, Part A, if campus eligibility changes during that time? Posted June 4, 2020**

TEA will accept amendments to the 2019-2020 application program schedules, including the SC5000, until June 30, 2020. These amendments only impact the program activities for the 2019-2020 school year.

After that date, 2019-2020 application program schedules cannot be amended. That means that the SC5000 cannot be changed. (Note: The budget schedules for the 2019-2020 grant application can be amended throughout the 2020-2021 year.)

If there are any changes needed to the SC5000, those will be reflected in the 2020-2021 grant application. The 2020-2021 application program schedules will govern the grant program for the 2020-2021 school year, regardless of whether 2019-2020 or 2020-2021 grant funds are used to pay the expenditure.

Salary Compensation

1. **May an LEA continue to pay salary and hourly-wage staff who are paid with federal grant funds that are 1) on administrative leave, or 2) who are teleworking while the LEA is closed due to COVID-19? Updated April 14, 2020**

Yes. Generally, a subgrantee may continue to charge the compensation (including but not necessarily limited to salaries, wages, and fringe benefits) of its employees who are paid by a currently active federal education grant.

Per federal regulations, as long as the LEA has a documented funding neutral local compensation leave plan/policy that is applied consistently to local, state, and federal activities, the costs are allowable. Based on this plan or policy, the LEA may continue to pay federally funded staff with federal grant funds consistent with how they are paying state or locally funded staff.

If a subgrantee does not currently have in place a policy that addresses extraordinary circumstances such as those caused by COVID-19, the subgrantee may amend or create a policy in order to put emergency contingencies in place for federal and non-federal funded employees. See also the ***FEMA FAQ*** section on School Board Policy to Support FEMA Reimbursement on the TEA Coronavirus webpage.

However, an employee who is currently being paid with federal grant funds can't perform different duties, not supported by the grant, while the program grant activities are closed in whole or in part due to the COVID-19 pandemic and also be paid separately for those different duties.

Subgrantees should consider ways that employees paid with federal grant funds can support continuing activities, including distance learning opportunities for students served by the grant.

2. **Can LEAs use federal grant funds to pay employee salaries for staff, who were not previously paid with federal funds, who are now conducting grant responsibilities due to COVID-19?** Posted April 21, 2020

If the staff are now serving students under various federal grant programs and conducting allowable federal grant activities, then yes, the staff may now be paid with federal grant funds. However, those employees job descriptions must be revised (date the revision) to reflect the allowable grant activities.

Grant Planning for School Year (SY) 2020-2021

1. **Will ESSA programmatic requirements such as updating policies, private school consultation, or parent meetings be waived in our planning process for next year's federal grant programs?** Posted March 27, 2020

ESSA program requirements that are part of the planning process for 2020-2021 school year are not being waived as of March 27th. However, each TEA program office will make decisions regarding any waivers needed to programmatic requirements when changes or additional waivers are needed. The district's planning process for the next school year may need to be altered based on the current circumstances at the time. TEA will be flexible in compliance reviews if the district documents their circumstances and tries to meet the intent of the law as best as they can at the time.

2. **What potential impact will school closures have on federal grant funds?** Posted March 27, 2020

LEA planning process for the next school year may need to be altered. TEA will be flexible in compliance reviews if districts document their circumstances and try to meet the intent of the law as best as they can at the time.

3. **Will grant application deadlines for 2020-2021 be extended?** Posted April 14, 2020

School year 2020-2021 grant applications (generally formula grants for SY 2020-2021) have not been extended. That decision will be made closer to when those grant applications are released (normally June).

The grant application deadlines that have been extended are current grant applications that are open for LEAs to apply. Any grant application deadline between March 27, 2020, through April 10, 2020, is extended to April 20, 2020. Current grant application deadlines originally posted for April 11 through May 3, 2020, will be extended two weeks.

4. **Is there a waiver being considered for the 2020-2021 ESSA Application process so districts may expedite the planning for 2020-2021 ESSA funding?** Posted April 14, 2020

Currently there is no plan to waive the 2020-2021 ESSA Consolidated Application. USDE has not offered this level of flexibility. TEA may revisit this question later if the situation changes.

5. **With current restrictions on gatherings, schools closed, and people working from home, how do we go about transitioning a Title I, Part A served campus from Targeted Assistance to become Title I Schoolwide for next school year?** Posted April 14, 2020

The LEA and its selected technical assistance provider may complete the planning process virtually. If the technical assistance provider is comfortable with the planning process, and can sign off on the process, TEA will accept the planning has been completed satisfactorily.

6. **As a Title I public school district, I know we are required to reach out to area private/non-profit schools and discuss title I with them if interested. Our informational meeting was set for mid-May, but now that we are in COVID-19 season I was not sure if we are still required to hold the meeting and send out information to interested parties? Do we hold a virtual meeting or postpone until later in the funding year?** Posted April 14, 2020

The requirements for outreach and consultation with eligible private nonprofit schools remain the same. Virtual meetings are acceptable if the district documents the meeting, discussions, and decisions made. The consultation timeline may be slightly delayed but must be completed before submitting the 2020-2021 application for funding to TEA. TEA will be flexible in compliance reviews if the district documents their circumstances and tries to meet the intent of the law as best as they can at the time.

7. **May an LEA use Facebook or other social media and virtual meeting options to conduct meetings which are required by Title I, Part A?** Posted April 21, 2020

The required Title I, Part A meetings may be held in a variety of virtual settings due to the circumstances. Document the meeting and those participating as best as you can. TEA will be flexible in compliance reviews if you document your circumstances and try to meet the intent of the law as best as you can at the time.

8. **How does TEA plan to address carryover of equitable services?** Posted April 21, 2020

Under ESSA, carryover of equitable services to private nonprofit schools requires approval from the state. Under the current COVID-19 pandemic, TEA will automatically approve all unexpended 2019-2020 equitable services funds to carryover into the next grant year. The LEA must document the amount of unexpended equitable services funds and include the uses of those funds in the consultation meetings with the private school officials when planning for the 2020-2021 equitable services. However, the LEA should be in consultation with the private school officials now to discuss alternative ways the equitable services might be provided through the end of the school year and this coming summer.

9. **With STAAR cancelled, TELPAS not able to be completed, and accountability now waived, we will not have 2020 results to use as part of the ESSA comprehensive needs assessment (CNA) and some of the performance objectives for 2020-2021 district and campus improvement plans. These of course are not the only data used, but the results drive a portion of the plan. Is going back to 2019 as a base okay, as well as using 2019-2020 benchmark data?** Posted April 30, 2020

For the required CNA under ESSA and specifically Title I, Part A, the LEA should consider all the data sources that are currently available such as progress monitoring results and other assessment data. The LEA may also need to use the 2019 assessments as a baseline as well. The LEA has some discretion in its data sources for the CNA.

10. **When will the entitlements for the 2020-2021 ESSA Consolidated Grant be posted?** Posted April 30, 2020

Planning amounts will be available by mid—May 2020.

11. **Due to COVID-19 school closures, is it correct that the EL Learner Identification assessment process cannot be completed virtually for participating PNP Schools? If yes, then how do we determine the number of eligible EL students for 2020-2021 ESSA Equitable Services Calculations on the application's schedule PS3099 (Part 2-D Line 2)?** Posted May 28, 2020

The identification assessment process to identify English learners for both the LEA and PNP cannot be completed virtually. The LEA can input an estimated count into their PS3099 (Part 2-D Line 2) until the LEA is able to continue the identification process at the beginning of the 2020-2021 academic school year. Once the PNP students have been assessed and identified for services, the LEA can amend their PS3099 with an updated count in Part 2-D Line 2.

12. **Is it required for the district to offer "pooling option" to the Title III participating PNP schools?** Posted May 28, 2020

While the pooling option for equitable services must be discussed during consultation for all ESSA programs, the LEA is not required to offer a "pooling" option for services.

13. **An LEA is moving a campus from Title I Schoolwide to non-Title I in 2020-2021. Because of the extension of the 2019-2020 grant into next school year, will this campus still have access to their 2019-2020 funds that were not expended this year, since the application on which they were identified as Schoolwide will still be active?** Posted May 28, 2020

No, if the campus is not to be served with Title I, Part A funds in 2020-2021, then the campus will cease to receive the 2019-2020 funding once the new school year begins. Any remaining funds from the campus would be reallocated to other participating campuses.

The program schedules in the 2020-2021 application for funding will overrule the 2019-2020 application program schedules for the 2020-2021 school year. The LEA will not amend the 2019-2020 application program schedules after the June 2020 deadline.

Eligible Uses of Grant Funds

1. **Can any of the Hurricane Harvey recovery grant funds be used to support COVID-19 response activities?** **Posted March 27, 2020**

No, disaster relief funds are specific to federal disasters as identified in the federal funding authorizing statute. Please note that we do expect federal stimulus funds for education that will likely be flexible in their allowable uses. Expect additional information in the next 30 days on availability, amount and eligible uses of any federal stimulus funds.

2. **Can LEAs use federal grant funds to provide hotspots for students without home Internet access or other costs associated with Learning from Home programs?** **Updated April 14, 2020**

Many school systems around the state are working to expand wireless hotspot locations in communities where free commercial Internet services are not otherwise available. Please document all costs associated with these expenditures, in anticipation that additional funding streams may become available as Congress continues to authorize financial support for COVID-19.

In the meantime, there are many sources of funds currently available to be redeployed for these types of purposes:
   ➢ ESSA, Title I, Part A served Schoolwide campuses may use their Title I, Part A funds to provide internet hot spots, technology resources, and other at home learning costs as long as it is identified in the campus comprehensive needs assessment (CNA) as a need.

Note: As long as the LEA has the required supplement, not supplant methodology documented and implemented, there is not a supplanting issue.

ESSA, Title IV, Part A may also be a potential federal fund source. However, Title IV has the traditional rules of supplant so it is only allowable if the LEA has not previously spent state or local funds for the same costs this year or in the prior year.

Other state or local funds may also be used for these types of activities, but keep in mind it may cause a supplant issue for the use of ESSA, Title IV, Part A funds as described above.

3. **If a subgrantee is planning future travel under a federal grant, may it purchase travel insurance with grant funds?** **Posted April 14, 2020**

Due to health concerns related to COVID-19, grant-supported travel generally should not be occurring. However, if travel is permitted by federal, state, and local directives and is the only means

to carry out an essential grant function that must be undertaken on a time-sensitive basis during the COVID-19 pandemic, consistent with the subgrantee's travel policy, travel insurance is an allowable cost, provided the cost is reasonable and allocable to the grant consistent with the Federal cost principles.

4. **Can activities, services, or technology applications paid with grant funds serve students who are not the intended beneficiaries of the grant program?** **Posted April 21, 2020**

Under most grant programs, no, grant funds may not serve other students who are not the intended beneficiaries of the grant program. Note that some grants may serve all students while other grants only serve a specific student group as identified in the grant statute and program guidelines.
Add to Eligible Uses of Grant Funds Section

5. **May Title III funds be used for supplemental pay for districts to have additional assistance with administering the LAS Links Assessment for reclassification purposes? If we are able to physically report in the summer months, we would like to consider offering supplemental pay for additional testers to support the work associated with administering the LAS Links for students who are potential for reclassification.** **Posted April 21, 2020**

Due to school closures ,the 2019-2020 English Learner Reclassification Criteria Chart was modified to reflect assessment changes. The LAS Links assessment is an option for LEAs to use to reclassify English learners only for the **2019-2020 school year**. The LAS Links assessment is the single statewide assessment that LEAs used to assess for English proficiency as per Texas Education Code (TEC) 29.056.

The following allowable use of funds/options were provided to LEAs to ensure that English learners that have access to their right to demonstrate English proficiency and to reclassify as English proficient during these unprecedented times:
- LEAs can use their local funds or Bilingual Education Allotment (BEA) funds to purchase the LAS Links assessments. Also, it would be an allowable expense to use Title III, Part A-ELA funds to purchase additional pre-LAS/LAS Links assessments to be used to reclassify English learners only for **2019-2020 school year**.
- LEAs can score the LAS Links assessments locally or LEAs can choose to send DRC the assessments to be scored for a fee. If LEAs choose to have DRC score the assessments for reclassification, their local funds or Bilingual Education Allotment (BEA) funds can be used to pay for such scoring. Also, it would be an allowable expense to use Title III, Part A-ELA funds to have DRC score the pre-LAS/LAS Links assessments for reclassification of English learners only for **2019-2020 school year**.
- LEAs can pay extra duty pay for teachers administering the LAS Links assessment (to be used for reclassification only for the 2019-2020 school year) using their local funds, Bilingual Education Allotment (BEA) funds. Also, it would be an allowable expense to use Title III, Part A-ELA funds only for the **2019-2020 school year.** Please note teachers administering the LAS Link assessments should be appropriately trained.

6. **Can ESSA funds pay for paraprofessionals to obtain teacher certification? Is there any additional flexibility in this area? Posted April 21, 2020**

A portion of Title I, Part A funds may be reserved at the LEA-level for LEA activities. Supporting paraprofessionals to become teachers could potentially be an allowable use of funds when all the programmatic requirements are met. However, Title I, Part A is a campus-based program to meet the identified needs of students so this type of LEA reservation would be limited. A better potential funding source would be Title II, Part A.

To date, USDE has been hesitant to waive the allowable uses of federal funds beyond the flexibility already described in the FAQ document.

7. **LEAs and ESCs have asked if a PNP may use Title I, Part A (eligible students), Title III, Part A (eligible students), and Title IV, Part A (all students) to purchase laptops/electronics? Hotspots are discussed elsewhere in the COVID-19 FAQ but not if an LEA may purchase hotspots for eligible PNP students. Updated MAY 28, 2020**

Under the current pandemic circumstances, ESSA equitable services funds may be used to purchase technology for instructional purposes. The grant funds may only be used to serve eligible students at the private school and all technology must be maintained in the control of the LEA, on the LEA inventory, and monitored for only non-ideological uses.

8. **How should an LEA handle a request in April from a private nonprofit school to start receiving equitable services under ESSA programs when the PNP turned down services in the consultation meetings earlier in the year? Posted April 21, 2020**

The LEA should politely notify the private school official that the deadline for requesting equitable services for 2019-2020 has passed and that program funds have been allocated to other uses. The LEA must also notify the private school official of the LEAs scheduled consultation dates for the 2020-2021 school year so the private school can be included in equitable services for next school year if they choose.

Note: USDE has in the past supported LEAs in closing the time period for a private school to request equitable services at the end of the fall semester.

9. **Do the grant end-date extensions apply to equitable services to participating private nonprofit schools? If so, how does an LEA continue to provide equitable services during school closure? Posted April 21, 2020**

The LEA should be in consultation with the private school officials now to discuss alternative ways the equitable services might be provided through the end of the school year and this coming summer. Distance learning is also occurring in most private schools, so the private school official will know the needs of the eligible students. Each case may be slightly different, but the LEA must ensure

they are in consultation with the private school officials and meeting the needs of the eligible students.

10. **Due to COVID-19, it allowable to use Title III PNP equitable service funds for instructional supplies/materials ONLY for use with EL students (with no direct instructional support services like tutoring)? What about once "normal" times resume after COVID-19 closures?** Posted May 28, 2020

Due to COVID-19, if needed and agreed upon, the LEA and the PNP can adjust the original agreement of equitable services using Title III funds to instructional supplies/materials only. For the following school year, the LEA and the PNP will consult and determine what equitable services will continue or adjust for English learners participating in a PNP.

11. **Is it allowable to use Title II, Part A grant funds to pay our teachers for our Summer School program this year in light of the current COVID-19 event that has created disturbance to the regular academic schedule and could possibly lead to an increase in summer school attendance?** Posted May 28, 2020

Generally, the only time teacher salaries are an allowable Title II, Part A expenditure is when you are adding teachers to reduce class size to a level that is evidence-based.

Specific Federal Grants - Migrant Students

1. **When all other LEA monetary resources have been expended, how can Migrant programs use their Migrant funds?** Posted April 14, 2020

TEA recognizes the key role that MEP staff play in outreach and advocacy for migratory families, therefore TEA urges MEP recruiters and staff to work to address those needs either directly, or by connecting the families to other available resources. However, the LEA must ensure this is an identified need for migratory children and their families and meets the intent and purpose of the program. Refer to the Title I, Part C Program Guidelines for allowable use of funds and the Supplement, Not Supplant Handbook.

2. **Can we use Migrant funds to provide migrant students with food and toiletries during the COVID-19 Pandemic?** Updated July 16, 2020

LEAs must continue to ensure that eligible migratory children are provided services from other available Federal, State, and local programs for which they are eligible. (See ESEA section 1306(b)(2)). For example, food for eligible migratory children should generally be provided by other Federal and non-Federal programs (e.g., school meals programs administered by the United States Department of Agriculture (USDA) Food and Nutrition Service, and community food banks). During this emergency, if food is not immediately available from other programs, the MEP may provide food to meet the identified needs of migratory children for a limited period, until other resources become available. In

addition, during these extraordinary circumstances, LEAs may take an approach to ensure eligible migratory children are able to access other necessities when there is a delay or lack of availability from other sources. Such necessities may include, but are not limited to, cleaning supplies for disinfection/sanitation purposes, first aid supplies, personal hygiene supplies, eyeglasses, hearing aids and batteries, and loaned equipment to access online learning.

3. **If an LEA learns of a new migrant family in the area, how will a COE be completed, if current LEA guidelines prohibit face-to-face contact?** **Posted April 14, 2020**

The Office of Migrant Education (OME) at USDE has instructed migrant districts to follow the guidance issued by their state educational agency (TEA) and local school district policy/procedures during periods of restricted personal contact. It is acceptable for the local MEP staff to conduct interviews with migratory families via telephone or video conferencing to obtain the information necessary to complete the Certificate of Eligibility (COE).

Once all the required information is collected on the COE except for the interviewee signature, proceed with the eligibility determination and COE approval process. Add a note to the Comments section of the COE to explain that COVID-19 procedures prevented the recruiter/interviewer from obtaining the interviewee's signature. After normal activities resume, contact the interviewee in-person, add the individual's signature to the COE and update the Comments section. Signatures may also be obtained by mail.

See this instructional video for information on how to electronically complete migrant forms and use electronic signatures.

4. **Districts are distributing books and supplies to students via a drive thru approach. Is purchasing masks, gloves and other health and safety related items with Migrant funds allowable for this activity?** **Updated July 16, 2020**

MEP funds may be used to provide the necessary supplies needed to perform migrant duties. However, the LEA must ensure that MEP funds first be used to meet the identified needs of migratory children that result from their migratory lifestyle, and to permit these children to participate effectively in school. MEP funds must meet the needs of migratory children that are not addressed by services available from other Federal or non-Federal programs and ensure funds are used to supplement, rather than supplant the use of non-Federal funds.

5. **Several Migrant project districts are teleworking. Are we still encoding on NGS? MSIX?** **Posted April 14, 2020**

If the district allows the staff to continue to work with confidential data while teleworking, MEP staff are to continue to comply with the FERPA requirements as outlined in the NGS and MSIX Oath Forms.

6. **With district closures, how will Migrant project LEAs be affected if/when NGS timelines are not met?** **Updated July 16, 2020**

Due to the current circumstance, NGS timelines will be re-evaluated and further guidance will be provided regarding the process.

NGS data collection timelines are extended to August 15th for the activities that occur throughout the spring and summer of 2019-2020. We encourage ESCs/LEAs to continue to follow the timelines for data entry as information becomes available. Please reach out to the NGS Helpdesk for guidance regarding the specific encoding process or refer the NGS/MSIX Manual. LEAs may consult with their ESCs if special circumstances exist in meeting the revised timelines.

7. **What are some ideas on facilitating Migrant transfer of records during LEA closures?** **Posted April 14, 2020**

If the district allows the staff to continue to work with confidential data while teleworking, we recommend that LEA MEP staff continue to use the tools available for transfer of records. These tools include reports found in NGS, MSIX. In addition, the [Texas Migrant Interstate Program](#) (TMIP) can assist with transfer of records.

8. **How will Migrant measurable performance objectives (MPOs) be affected by COVID-19?** **Posted April 14, 2020**

Due to the current circumstance, MPOs will be re-evaluated and further guidance will be provided regarding the process.

9. **How would an LEA offer Project SMART home-based instruction virtually?** **Updated May 28, 2020**

Because this program already includes a home-based curriculum, instructors have access to lessons that have been written to be delivered to one student. The major difference in delivering the lessons virtually instead of in-person is the preparation that the instructors will need to do ahead of time. This program is designed to offer hands-on, interactive lessons.

10. **What tools may Migrant administrators purchase to implement the summer program?** **Posted April 14, 2020**

TEA provides Project SMART as a free summer Migrant program available to MEP-funded LEAs. The LEA may choose other options for summer Migrant services, at their discretion.

11. **It was mentioned that we are to see funding decreases next school year in the Migrant program. What decreases can we anticipate? How will COVID -19 affect funding to MEP programs?** **Posted April 14, 2020**

The MEP will see approximately a 38% decrease in funding due to the hold harmless provision in statute expiring starting in 2020-2021. This is an ESSA statutory formula provision and is not an impact of COVID-19.

12. How can we do a Migrant residency verification form on a new potentially eligible child?
   Posted April 14, 2020

We recommend that Migrant Education Program (MEP) recruiters and other MEP ID&R staff follow the guidance issued by their local school district(s). It would be acceptable for the LEA to allow MEP staff to conduct these residency verifications with migratory families via telephone or video conferencing to obtain the information necessary to include in the Certificate of Eligibility (COE).

We recommend that the MEP document in COE Supplemental Documentation Form (SDF) section designated for the P2s Turning P3. This information may be used to update NGS records regarding RV. We further recommend that a note be added to the Comments section of the COE Supplemental Documentation Form (SDF) to explain the circumstances that prevented the recruiter/interviewer from obtaining the signature of the person interviewed for this verification. After normal activities resume, if MEP staff can contact the interviewee in-person, we recommend that the individual's signature be added to the COE SDF and the Comments section be updated. At that time, signatures may also be obtained by mail.

13. Has the issue of 3rd year migrant families that were going to migrate this summer, but now may not travel because of COVID-19, been addressed? Is TEA considering an expiration waiver for these families due to circumstances beyond their control? **Updated July 16, 2020**

In general, MEP funds may only be used for services and activities to identify and address the needs of currently eligible migratory children. However, there are exceptions, such as continuation of services for formerly eligible migratory children. (See section 1304(e) of the Elementary and Secondary Education Act of 1965 (ESEA)).

14. Does TEA have specific guidance on MEP Certificate of Eligibility (COE) during COVID-19?
   Posted April 30, 2020

Yes, a COE guidance protocol has been developed for districts. For more information on the Texas MEP COVID-19 COE Protocol please see the document located on the TEA Coronavirus webpage under Waivers, Finance, and Grants.

15. Is there a uniform comment that the Agency would like us to write on the Supplemental Documentation Form (SDF)? **Posted April 30, 2020**

For more information on the Texas MEP COVID-19 COE Protocol please see the document located on the TEA Coronavirus webpage under Waivers, Finance, and Grants.

16. After normal activities resume, will the COE be acceptable if the parent is no longer in the area for signature? Posted April 30, 2020

MEP staff should get the signature when the parent is available. In addition, the parent can sign and mail the signed COE after normal activities resume. If the family has left the area, then the existing COVID-19 COE is enough documentation to support their eligibility while they were in the district.

17. What does "signatures may also be obtained by mail" mean? Posted April 30, 2020

The parent can be mailed a copy of the COE for their signature after normal activities resume. The parent will then need to mail the COE and COE Supplemental Documentation Form (SDF) back. The signed COE, therefore, becomes the auditable copy for the LEA.

18. Are masks and gloves allowable costs with Migrant funds when needed to perform our Migrant responsibilities, such as recruitment and outreach, when we are following social distancing guidelines? Posted April 30, 2020

MEP funds may be used to provide the necessary supplies needed to perform migrant duties. However, the LEA must ensure that MEP funds first be used to meet the identified needs of migratory children that result from their migratory lifestyle, and to permit these children to participate effectively in school. MEP funds must meet the needs of migratory children that are not addressed by services available from other Federal or non-Federal programs and ensure funds are used to supplement, rather than supplant the use of non-Federal funds.

19. Does OME have a Recruiter Supplies List? Posted April 30, 2020

No, OME does not have a Recruiter Supplies List.

20. We understand that MPOs will be re-evaluated. Will copies of the MPO Forms be provided to ESCs for distribution or can we use the same ones from last school year? Posted April 30, 2020

Yes. TEA will be providing copies of the updated MPO Forms.

21. Aside from supplies, materials and resources, can migrant funds be expended on equipment for teachers and students (e.g., electronic devices, MiFi, headphones, etc.) to implement the summer program via distance learning? Posted April 30, 2020

Yes, these are allowable costs, but LEA must ensure that it is an identified need and it is reasonable.

22. If personnel are teleworking and do not have access to formerly completed COEs, can residency verification be documented on a contact log? Posted April 30, 2020

Yes, residency verification in this instance can be documented on a contact log.

23. After normal activities resume, can the recruiter transfer the residency verification documentation from a contact log to comments section of the SDF? **Posted April 30, 2020**

Yes.

24. ESCs were anticipating guidance from TEA MEP on how to instruct LEAs to complete the Quarterly Report which is Step 3 of the PFS Implementation Process. Will guidance be issued, or will this be placed on hold? **Posted April 30, 2020**

LEAs should, if able, continue to assess the needs of PFS students and provide services as appropriate and keep documentation locally.

25. Are districts required to conduct PFS Reviews for the second and third quarters of this school year? **Posted April 30, 2020**

LEAs should, if able, continue the reviews and keep documentation locally.

26. What materials would be needed to deliver the content of the Project SMART program virtually? **Updated May 28, 2020**

There are steps instructors will need to take when preparing for the virtual lessons that will differ from the preparation needed for face-to-face home-based instruction.
   a. Ensure access to a printer and all the materials/manipulatives needed for the grade bands/units they will be teaching.
   b. Plan for each unit of instruction one at a time, as there are many things to consider in the transition to virtual support.
   c. Read through Unit 1 and make note of any things to keep in mind when delivering the training virtually. For example:
      i. What documents/items will be shown on camera?
      ii. How will I record and display student responses to create an anchor chart with the student?
   d. Prep materials kits for **Unit 1** for each of your students. Include the following in each kit:
      i. Student Handouts packet
      ii. Cut-apart cardstock items, color-coded by lesson and separated. For older students and with parent permission, scissors and the cardstock pages to cut apart. Color coding the cardstock will make it easier for students to determine which items you are referencing during the live portion of the class)
      iii. Manipulatives that will be used during the lessons or access to virtual manipulatives such as:
         1. Ten frames
         2. Two color counters
         3. Beaded number line
         4. Connecting cubes

5. [Math rack](#)
6. Balance scale
7. [Base ten blocks](#) (for some lessons, this may be difficult to use due to larger quantities of blocks needed.
8. [Algebra tiles](#)
   iv. Other materials needed for the lesson (refer to [Materials List](#) or review the lessons in detail and only send those items for lessons you will actually teach).
e. Review the Teacher Handouts document for your grade band and decide if any of the items will need to be printed and placed in the Unit 1 Materials Kit for each student. For example, if there is a set of cards you will be holding up one at a time for students to look at, consider printing the cards and cutting them out.
f. Prep cardstock items and handouts that you will need to show onscreen.
   i. Ensure you have installed Adobe Acrobat Pro.
   ii. Download the Student Handouts and Teacher Handouts documents and save them to your desktop.
   iii. Practice sharing your screen and showing the document via your live session. Ensure you are only showing the page needed for the specific piece of the lesson.
   iv. Consider enabling annotations during your Zoom with each student so the student (and you) will be able to write directly on the document. For information on how to do this, click [here](#).

27. Due to school closures, is Project SMART required to be conducted by LEAs? **Updated May 28, 2020**

No, however, LEAs that have indicated they will be offering a Project Smart program on their grant application will need to submit an amendment if they decide not to offer the program.

28. There have been conversations of the regular school year being extended to the summer and/or the continuance of following social distancing through the summer. If districts had selected Summer Programs on their ESSA Application, will they have to amend? If yes, is there still time for districts to amend their applications? **Posted April 30, 2020**

Yes, LEAs can amend. See your program guidelines for the last date to amend the application.

29. As families are being contacted, they are expressing that they will be unable to migrate this year due to COVID19. Consequently, their eligibility will be expiring. Is the Office of Migrant Education planning to extend migrant child eligibility for continuation of services as the parents of the affected children are concerned that they need migrant program assistance? **Posted April 30, 2020**

This question has been sent to USDE. We will provide their response once it is received.

30. **Normally districts keep emails as a form of documentation when coordinating or communicating with stakeholders or other district staff. Due to COVID 19 ordinances, some people may not have a way to communicate through emails so text messages may have been sent. Will districts be allowed to use screenshots of text messages as evidence of required program items? Many districts are using text messaging to communicate because it is more accessible during this time.** **Posted April 30, 2020**

This mode of communication should be used with caution due to the security of information and confidential integrity of migrant student record data and transference in compliance with the Family Educational Rights Privacy Acts of 1974 (FERPA). Districts should have secure means to maintain auditable documentation to support the program requirements.

31. **How are district staff expected to complete the Migrant Progress Review for students when communication is limited, or the Migrant student is not receiving the same interventions as before COVID-19?** **Posted April 30, 2020**

The requirement for a progress review should be met as appropriate. LEAs should maintain documentation that demonstrates their efforts to meet the needs of Priority for Services (PFS) students, as appropriate, during the COVID-19 situation.

32. **How do Migrant program staff decide whether to offer face-to-face instruction or virtual instruction for Project SMART?** **Posted May 28, 2020**

This decision will need to be made by each individual LEA or ESC SSA staff using guidance provided from campus/district administrators or ESC leadership teams.

33. **What is the latest date an LEA can start or end a home- or center-based Project SMART program? Is there a minimum number of hours/days a program must be offered this summer?** **Posted May 28, 2020**

These decisions will need to be made by each individual LEA or SSA. Consideration should be given to the amount of instructional time that will be available. As evidenced by the data reviewed during the TOT, post-assessment scores increase from as little as one full unit of instruction.

At the present time, all Project SMART data is due to ESC 20 by August 1, 2020. We will be extending this due date to August 15 to ensure districts have time to submit data if they offer a longer program. Email sherri.nunneley@esc20.net if your LEA will be submitting data after that date.

LEAs offering virtual instruction of the program will not collect or submit pre- and post-assessment data.

34. **Can LEAs order Project SMART videos, even though we do not know when they will be ready to ship?** **Posted May 28, 2020**

Yes, LEAs can order the Project SMART DVDs via the ESC-20 eStore. The eStore staff are prepared to confirm each order when a shipping date is known, ensuring that LEAs who decide they no longer will need the DVDs have an opportunity to cancel the order.

As a reminder, all videos will also be available to stream at no charge to the LEA via the Project SMART website.

35. Are there examples of how Project SMART can be implemented in a region operating an SSA (Shared Services Arrangement)? Posted May 28, 2020

Operating Project SMART within an SSA will look different in every SSA. ESCs may decide to offer a center-based program at an LEA with a higher number of migrant students and offer home-based support for LEAs with fewer students. ESCs needing additional guidance in this area may email Rachel.Morales@esc20.net .

36. We may not have 20 parents in our region who complete the Parent Survey or 20 students who complete both the pre- and post-assessment. The sample size for this data is 20 parents and students per region. Should we submit what we received? Posted May 28, 2020

Yes, submit all parent surveys you receive even if you did not meet the minimum sample size requested.

Upload the Item Analysis data for as many students as possible, up to the requested sample size for each region.

37. What if students in the Project SMART program do not have devices (laptops/tablets) and/or internet access? Posted May 28, 2020

In order to participate virtually from home, students would need to have a tablet or laptop. If the LEA has not provided devices for students, and MEP staff have identified the need for a child to participate in the program, migrant funds may be used to provide devices for students/parents to check-out in order to participate in MEP-funded services and may provide access to the internet (via a hub that is checked out). MEP staff must ensure that:
    a. the purchase of technology and technology-related items are allowable;
    b. the devices can be purchased, received, and delivered to the students in time for the program to be implemented;
    c. students/parents are taught how to use the devices; and
    d. students are provided training on internet safety.

38. How will virtual instructors collect pre- and post-assessment Project SMART data? Posted May 28, 2020

Because we will not be able to ensure fidelity of the data collected when students are completing the assessments in a virtual setting without the instructor present, do NOT administer or submit assessment data if the program was taught in a virtual setting.

39. How will virtual instructors collect parent survey data? Posted May 28, 2020

Parent survey data may be collected by scheduling time for the parent to complete it in person. The instructor can drop off the survey at a predetermined location (on the front porch or in the mailbox), wait in the car for the parent to complete the survey, then collect it. Instructors can return to the home and repeat the process at the end of the summer.

Another option is to display the survey onscreen during a Zoom, ask the parent the questions, and record the responses received. Notate on the form that the parent provided verbal responses via virtual meeting.

40. Are there updated supply and materials lists for a Virtual Project SMART summer program? Posted May 28, 2020

No, the materials for virtual instruction would be the same as in face-to-face instruction. What will be different is how/whether the materials are provided to the students virtually or in materials kits created by the instructors.

41. Is an electronic book list available for Project SMART? Posted May 28, 2020

The program developers do not provide information on where or how to purchase books; the decision to purchase e-books or actual books is left to the LEA. That being said, providing the actual books to students has always been highly encouraged at the Project SMART TOT since many migrant families do not have home library collections for their children. In addition, many migrant families do not have internet access at home, nor do they own tablets or laptops on which to download the books.

42. What platforms would instructors use to deliver Project SMART virtual instruction? Posted May 28, 2020

Instructors should check with MEP staff regarding the appropriate virtual instruction platform for hosting classes with students in the LEA. The ideal platform will allow for both the instructor and student to share their screen, join by audio, join by video, and annotate documents.

43. If an LEA decides to not offer Project SMART, can they print the lessons and prep the materials for parents and suggest they use them as the "instructor" at home? Posted May 28, 2020

The Project SMART lessons were written specifically for use by educators. At this time, LEA staff are not permitted to provide copies of the lessons to the parent for general home learning use.

44. When can a MEP begin summer school services? Posted July 16, 2020

LEAs may begin MEP summer projects before the end of the regular school year, depending on when migratory children arrive and what their needs are, and making sure that the instruction does not interfere with the regular school year instruction and that it supplements it. However, these children may not begin generating a summer child count for the State until the regular school year has ended (see MEP Non-Regulatory Guidance, Chapter IX, B30). The closure of school buildings does not necessarily mean that the regular school year has ended, and the summer or MEP-funded summer or intersession has begun. A key consideration is whether school operations are continuing virtually while the buildings are closed and whether the school considers its virtually provided instruction to be part of the 2019-20 spring term/regular school year.

45. What is TEA's expectation for conducting a MEP evaluation for 2019-2020? Posted July 16, 2020

A program evaluation will still need to be conducted. However, the program implementation document, Fidelity of Strategy Implementation (FSI), will be modified to include two time frames: implementation from September 2019 to February 29, 2020, and from March 1, 2020 to the end of the school year (regular year programs), and/or through the summer 2020 (year-round programs). In addition, the number of surveys to be collected will be reduced, and the deadline to complete the FSI will be extended to August 31st.

46. What are LEAs that offered A Bright Beginning (ABB, the Migrant Early Literacy Program), going to do about post-tests? Posted July 16, 2020

Due to the challenges anticipated in administering the A Bright Beginning (ABB) assessments in a virtual setting, LEAs will not be required to administer either the pre- or post-assessment, if administration would need to occur in a virtual setting. However, the LEAs should maintain any documentation that serves as evidence of progress monitoring of the ABB students, such as anecdotal records and portfolio samples.

47. Will there be an extension on the deadline for contacting families of currently eligible migrant students to determine if new qualifying moves have occurred? Posted July 16, 2020

The *2019-2020 and 2020-2021 Texas Manual for Identification and Recruitment of Migrant Children* provides a template for an ID&R Plan that is intended to assist the LEA/ESC with their recruitment efforts within project and non-project LEAs. Section II, D of that templates provides August 29th as the deadline to *"Contact families of currently eligible migrant students to determine if new qualifying moves have occurred."* However, if additional time is needed, the LEAs may continue their efforts to reach out to those families and maintain documentation.

48. Due to current COVID circumstances, are LEAs required to implement the A Bright Beginning (ABB) program? Posted August 20, 2020

Title I, Part C Program-Specific Assurances state that LEAs accepting these funds, to the extent possible, assure the following:

- Coordinate with other programs (e.g., Head Start or other agencies that provide preschool services to migratory children ages 3-5 (not in kindergarten)) with access to school readiness services.
- Implement the TEA-approved early literacy program (A Bright Beginning) for migratory children ages 3-5 (not in kindergarten) that are not served by other programs. (Regular school year and during the summer)

49. What is the latest date an LEA can start or end a home- or center-based ABB program? Posted August 20, 2020

These decisions will need to be made by each individual LEA or SSA. LEAs offering virtual instruction of the program will not be required to collect or submit pre- and post-assessment data, unless the assessments were administered face-to-face.

50. Aside from supplies, materials and resources, can migrant funds be expended on equipment for teachers and parents/children (e.g., electronic devices, WiFi, headphones, etc.) to implement the A Bright Beginning program via distance learning? Posted August 20, 2020

Yes, these are allowable costs, but LEA must ensure that it is an identified need and it is reasonable.

51. What if the parents/children in the A Bright Beginning program do not have devices (laptops/tablets) and/or internet access? Posted August 20, 2020

To participate virtually from home, the parent/child would need to have a tablet or laptop. If the LEA has not provided devices for the parent child and MEP staff have identified the need for the child to participate in the program, migrant funds may be used to provide devices for parents/children to check-out in order to participate in MEP-funded services and may provide access to the internet (via a bug that is checked out). MEP staff must ensure that:
a. The purchase of technology and technology-related items are allowable
b. The devices can be purchased, received, and delivered to the parent in time for the program to be implemented; and
c. Parents are taught how to use the devices.

52. If an LEA decides to not offer A Bright Beginning, can they print the lessons and prep the materials for parents and suggest they use them as the "instructor" at home? Posted August 20, 2020

The A Bright Beginning lessons were written specifically for use by educators. At this time, LEA staff are not permitted to provide copies of the lessons to the parent for general home learning use.

53. How do Migrant program staff decide whether to offer face-to-face instruction or virtual instruction for A Bright Beginning? **Posted August 20, 2020**

This decision will need to be made by each individual LEA or ESC SSA staff using guidance provided from campus/district administrators or ESC leadership teams.

54. What platforms would instructors use to deliver A Bright Beginning virtual instruction? **Posted August 20, 2020**

Instructors should check with MEP staff regarding the appropriate virtual platform for hosting classes with students in the LEA. The ideal platform will allow for both the instructor and the participating ABB parent and child to share their screen, join by audio, join by video, and annotate documents.

55. How will virtual instructors collect pre- and post-assessment ABB data? **Posted August 20, 2020**

The assessment for ABB must be administered face-to-face to ensure fidelity of the data collected, since the instructor must be in proximity of the child to observe specific child behaviors. Instructions may choose to use parts of the assessment to capture formative data on the child and inform their instruction. No child assessment data should be entered into NGS unless the assessment was administered face-to-face.

56. How will virtual instructor collect parent survey data? **Posted August 20, 2020**

Recruiters, not virtual instructors, should collect the parent survey data to allow the parents anonymity in their responses.

Use the "**Completed by the parent**" version of the survey in one of the following ways.
1. Schedule time for the parent to complete it in person. The recruiter can drop off the survey at a predetermined location (on the front porch or in the mailbox), wait in the car for the parent to complete the survey, then collect it.
2. Send the survey electronically to parents who have computer and email access. Email the fillable survey to the parent. The parent can complete it electronically, save the document and email it back.

Or, use the "**Completed by MEP staff on behalf of the parent**" version of the survey in one of the following ways.
1. Display the survey onscreen during a Zoom, ask the parent the questions, and record the responses.
2. Complete the survey by communicating with the parent over the telephone. As the parent answers the question, mark the responses on either the fillable document or a hard copy.

57. Are there updated supply and materials lists for a Virtual A Bright Beginning program?
   Posted August 20, 2020

No. The materials for virtual instruction would be the same as in face-to-face instruction. What will be different is how/whether the materials are provided to the parent and child virtually or in materials kits created by the instructors.

58. Is an electronic book list available for A Bright Beginning? Posted August 20, 2020

A6. The program developers do not provide information on where or how to purchase books; the decision to purchase e-books or actual books is left to the LEA. Providing the actual books to the parents/children has always been highly encouraged at the ABB TOT since many migrant families do not have home library collections for their children. In addition, many migrant families do not have internet access at home, nor do they own tablets or laptops on which to download the books.

59. How would an LEA offer A Bright Beginning home-based instruction virtually? Posted
   August 20, 2020

Because this program already includes a home-based curriculum, instructors have access to lessons that have been written to be delivered to one child with parent involvement. The major difference in delivering the lessons virtually instead of in-person is the preparation that the instructors will need to do ahead of time. This program is designed to offer hands-on, interactive lessons. Instructors may want to consider meeting virtually with the parent before beginning each lesson to ensure all materials are readily available for use during the lesson.

Delivery of this content virtually may have unique challenges due to the short attention span of 3- and 4- year old students. Instructors may want to consider scheduling two half-hour sessions per week instead of the recommended one-hour session.

60. What materials would be needed to deliver the content of the A Bright Beginning
   program virtually? Posted August 20, 2020

There are steps instructors will need to take when preparing for the virtual lessons that will differ from the preparation needed for face-to-face home-based instruction.
   a. Ensure access to a printer and all the materials/manipulatives needed for the units they will be teaching.
   b. Plan for each unit of instruction one at a time, as there are many things to consider in the transition to virtual support.
   c. Read through the first unit and make note of any things to keep in mind when delivering the instruction virtually. For example:
      • What documents/items will be shown on camera?
      • How will I record and display the child's responses to create an anchor chart with the child?

d. Prep materials kits for the first unit for each of your students. Include the following in each kit:
- Copies of all handouts for the parent/child
- Cut-apart cardstock items, color-coded by lesson and separated. (Color coding the cardstock will make it easier for the parent to determine which items you are referencing during the live portion of the class)
- Manipulatives that will be used during the lessons or access to virtual manipulatives, if available.
- Other materials needed for the lesson (refer to Materials List or review the lessons in detail and only send those items for lessons you will teach).

e. Review the templates and documents for the unit and decide if any of the items will need to be printed and placed in the Materials Kit for each child. For example, if there is a set of cards you will be holding up one at a time for a child to look at, consider printing the cards and cutting them out.

f. Prep cardstock items and handouts that you will need to show onscreen.
- Ensure you have installed Adobe Acrobat Pro.
- Download the documents you need and save them to your desktop.
- Practice sharing your screen and showing the document via your live session. Ensure you are only showing the page needed for the specific piece of the lesson.
- Consider enabling annotations during your Zoom with each parent and child so they (and you) will be able to write directly on the document. For information on how to do this, click here.

61. Can students, who are properly identified as migrant, enroll in our district and receive instruction through remote instruction during the pandemic while they are outside the LEA due to their migratory lifestyle? Posted September 3, 2020

Yes, the identified migrant students may be enrolled and provided remote instruction by your LEA and must be coded ADA 0-Enrolled, Not in Membership while not residing in Texas.

62. How do we address the high number of students showing up in the Priority for Service Reports on NGS due to the list including students that did not test in the Spring?

LEAs should review the list of PFS students and determine the individual needs of students.

NEW
12/10/20

63. For migrant families reaching their third year of eligibility and who were not able to travel this summer because of COVID, is TEA considering an expiration waiver? NEW December 10, 2020

Guidance from USDE Office of Migrant Education is as follows, "*regarding the possibility of a MEP-eligibility expiration waiver for migratory children who will not move due to the pandemic and therefore will reach the end of their MEP eligibility, this is not allowable. The 36-month period of eligibility is established by Federal statute, as part of the definition of migratory child in ESEA section 1309(3)."*

Specific Federal Grants - TTIPS

1. **Will Texas Title I Priority Schools (TTIPS) grant campuses be required to submit the TTIPS Activity Plan and PSP Progress Reports on June 30, 2020 and the End of Year Part 1 and Part 2 reports on July 31, 2020?** **Posted May 7, 2020**

The Texas Education Agency is currently focused on supporting districts and campuses across the state in what matters most right now - the health and safety of students, staff, families and school communities. Additionally, we are doing our best to help support instructional continuity for students across the state. We believe this is where our schools and districts should be spending their time as well.

Regarding interventions and submissions, the Division of School Improvement is delaying pending submissions for the remainder of this school year. TEA School Improvement specialists will reach out with dates for submission of TTIPS Activity Plan, PSP Progress Reports and End of Year Part 1 and Part 2 reports. We will be working on guidance and resources that will allow campuses and districts to reflect on the implementation of this year's Targeted Improvement Plans in a way that provides focus and a strong starting point for next school year's Targeted Improvement Plans.

2. **Is the TTIPS grant covered by the most recent ESSA waiver submitted by the Texas Education Agency? If the TTIPS grant is not covered under the waiver, will the grant be extended into the 2020-2021 school year?** **Posted May 7, 2020**

The TTIPS Cycle 4 and Cycle 5 grants were authorized through the No Child Left Behind Act of 2001 and therefore were not included in the Every Student Succeeds Act (ESSA) waiver submitted by the Texas Education Agency to the United States Department of Education in April of 2020.

For TTIPS Cycle 4 grant recipients, the grant cannot be extended past the current end date of July 31, 2020. Cycle 4, Year 5 grant recipients must continue to follow the timelines listed on the TEA Grant Opportunities page, which include the last day to submit an amendment of May 1, 2020 and final and revised final expenditure reports due by August 31, 2020.

For TTIPS Cycle 5 grant recipients, the agency is authorized to extend the grant until June 30, 2021. However, there is not a specific timeline as to when the LEA should expect this process to be complete, as TEA has many subgrantees within each of the grant programs that will receive an extension. Please know this NOGA is an extension of current funds and not a new allotment. The purpose of this extension is to allow additional time to expend remaining TTIPS funds through the 2020-2021 school year.

3. **For TTIPS grant recipients whose grants are ending this year, does the campus need to do anything else to close the grant?** **Posted May 7, 2020**

TTIPS Cycle 4 grant recipients must continue to follow the timelines listed on the TEA Grant Opportunities page, which include final amendments to the grant due May 1, 2020 and final

expenditure report and final revised expenditure report by August 31, 2020. TEA School Improvement specialists will reach out with dates for submission of TTIPS Activity Plan, PSP Progress Reports and End of Year Part 1 and Part 2 reports.

4. **How will the requirement to provide incentive pay be addressed now that state assessments have been cancelled? Will the incentive pay requirement be waived or can the 2019-20 incentive plan be modified to include any campus measures met prior to COVID? Posted May 7, 2020**

For grant recipients that have included incentive pay as part of its grant application, the agency is recommending the campus modify its incentive pay plan to include criteria outside of state assessment data. Ultimately, LEAs will determine whether incentive pay will be awarded to teachers and staff for the 2019-2020 school year.

5. **For grant recipients who had an Effective Schools Framework Diagnostic written into their grants, will a partial ESF which reviewed the pre-work, but not the actual on-site campus diagnostic suffice? Posted May 7, 2020**

The Division of School Improvement shows that all TTIPS Cycle 4 and Cycle 5 grant recipients have received an Effective Schools Framework Diagnostic and have submitted the ESF Diagnostic Final Report in ISAM. If there are additional questions regarding the Effective Schools Framework Diagnostic, please reach out to the division at SIDivision@tea.texas.gov for clarification.

6. **With the TTIPS Cycle 5, Year 4 grant extension, will the school improvement interventions remain the same through the 2020-2021 school year? Will PSPs be assigned to assist in the 2020-2021 school year? Posted May 7, 2020**

The Division of School Improvement is currently considering multiple options for interventions for TTIPS Cycle 5, Year 4 grant recipients including the role of the Professional Service Provider. Final intervention requirements will be communicated to campuses as soon as possible.

7. **We have a significant amount of money allocated to field trips, many of which were happening at the end of the year and have been postponed. Should we shift this money to a different priority or is there the possibility of rescheduling the trips next year? Posted May 7, 2020**

For TTIPS Cycle 4 grant recipients, the grant cannot be extended past the current end date of July 31, 2020. Cycle 4, Year 5 grantees should review their approved budget and if necessary, submit an amendment to their current approved grant application. For more information on when to amend a grant, LEAs should review the When to Amend the Application on the Grants Administration Division website.

TTIPS Cycle 5, Year 4 grant recipients should be able to reschedule field trips into the 2020-2021 school year. If a Cycle 5, Year 4 grant recipient is unable to reschedule a field trip, they should review their approved budget and if necessary, submit an amendment to their current approved grant

application. For more information on when to amend a grant, LEAs should review the [When to Amend the Application](#) on the Grants Administration Division website.

Stimulus Funding under the CARES Act

For information on CARES ACT questions, please see the **CARES ACT Funding and Documentation FAQ** located on the [TEA Coronavirus webpage under Funding and Waivers.](#) **Posted May 21, 2020**

For information on the CRF LEA Reimbursement Program, please see the Guidance on TDEM's website at https://tdem.texas.gov/crf-lea/. **Posted July 28, 2020**