



# COVID-19 AND FEDERAL GRANT FUNDS: FREQUENTLY ASKED QUESTIONS

*DEPARTMENT OF GRANT COMPLIANCE AND  
ADMINISTRATION*

Compiled from TEA's Published [COVID-19 Support and Guidance](#)

# Contents

<b>COVID-19 and Federal Grant Funds: Frequently Asked Questions</b> .....	<b>0</b>
<b>Introduction</b> .....	<b>1</b>
<b>Guidance Forthcoming from USDE</b> .....	<b>1</b>
<b>FAQ</b> .....	<b>1</b>
<b>Federal Grant Funds and Staff/Teacher Pay</b> .....	<b>1</b>
1. May an LEA continue to pay salary and hourly-wage staff who are paid with federal grant funds administrative leave while the LEA is closed due to COVID-19? (03/20/2020) .....	1
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? (03/20/2020) .....	1
3. 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? (03/27/2020) .....	1
<b>Waiver Request</b> .....	<b>1</b>
1. Is TEA requesting flexibility from Feds on federal funding awards? (03/20/2020)..	1
2. 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? (03/27/2020).....	2
<b>Funding and Use of Funds</b> .....	<b>2</b>
1. What type of expenditures will the USDE reimburse? What documentation will we need to receive reimbursement? (03/20/2020) .....	2
2. What happens to my Federal/State grant funding if expenses (travel/conferences/etc) are now cancelled? (03/20/2020) .....	2
3. What types of flexibility are available for federal funding? (03/20/2020) .....	2
4. Can any of the Hurricane Harvey recovery grant funds be used to support COVID-19 response activities? (03/27/2020).....	2
5. Do you expect current federal grant allocations to change due to COVID-19? (03/27/2020) .....	2
6. What potential impact will school closures have on federal grant funds? (03/27/2020) .....	3
7. Can districts use federal grant funds to provide hotspots for students without home Internet access? (03/21/2020).....	3
<b>EDGAR Requirements</b> .....	<b>3</b>
1. Will there be any flexibility to federal EDGAR regulations around procurements, such as price quotes or competitive processes? (03/27/2020) .....	3
<b>Grant Deadline/Extensions</b> .....	<b>4</b>
1. What specific grant programs do the deadline extensions announced by the Department of Grant Compliance and Administration (GCA) apply? (03/27/2020) .....	4
2. Will grants with project end dates between now and September 2020 receive extensions to the end dates? (03/27/2020) .....	4
<b>Carryover</b> .....	<b>4</b>

1. Will there be exceptions for carryover amounts for Title funds and grants?  
(03/20/2020) ..... 4

## Introduction

This FAQ provides answers to questions related to federal grant funds and how they may be used in regard to COVID-19. Responses will be posted here after they are approved and posted on the [Coronavirus \(COVID-19\) Support and Guidance](#) page of the agency's website. The date after each question indicates when it was posted there.

Refer to the [Coronavirus \(COVID-19\) Support and Guidance](#) page for additional information from TEA regarding COVID-19 and its impact on Texas K-12 schools and students.

## Guidance Forthcoming from USDE

USDE is expected to issue ongoing federal grant allowability guidance. TEA will issue guidance as soon as it is received. The Office of Management and Budget (OMB) has issued recommendations to the federal agencies to offer guidance and flexibility to grantees; however, USDE must make the decision and notify grantees before any flexibility is granted.

## FAQ

As this document is updated, the version and date on the cover will change to indicate the new release. New questions and answers will be added to the end of each section as information is approved or received from USDE.

### Federal Grant Funds and Staff/Teacher Pay

- 1. May an LEA continue to pay salary and hourly-wage staff who are paid with federal grant funds administrative leave while the LEA is closed due to COVID-19? (03/20/2020)**

Per federal regulations, as long as the district has a 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, the LEA may continue to pay federally funded staff with federal grant funds consistent with how they are paying state or locally funded staff.

- 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? (03/20/2020)**

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

- 3. 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? (03/27/2020)**

Per federal regulations, as long as the district 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.

### Waiver Request

- 1. Is TEA requesting flexibility from Feds on federal funding awards? (03/20/2020)**

Yes, TEA will request waivers under ESSA, Section 8401 related to various EDGAR federal regulations, such as extending the period of availability (life) of the funds when needed. These ESSA waivers can generally cover all federal grant programs when they

are waiving EDGAR requirements. These waivers can also be requested for specific ESSA programmatic requirements. However, IDEA does not have a similar waiver provision for IDEA programmatic provisions such as MOE.

**2. 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? (03/27/2020)**

ESSA program requirements that are part of the planning process for 2020-2021 school year are not being waived as of March 27, 2020. However, each TEA program office will make decisions regarding any waivers needed to programmatic requirements when changes or additional waivers are needed.

Your 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 you document your circumstances and try to meet the intent of the law as best as you can at the time.

## **Funding and Use of Funds**

**1. What type of expenditures will the USDE reimburse? What documentation will we need to receive reimbursement? (03/20/2020)**

Until guidance is received from USDE, document the expenditures as you normally would and include the need for the expenditure, the reasoning for the expenditure, why federal funds are needed to address the need, and that it is COVID related. If possible, consider a subcat or local option code in your accounting system so that you can specifically identify these types of costs should USDE deem they are allowable uses of federal grant funds in this situation.

**2. What happens to my Federal/State grant funding if expenses (travel/conferences/etc) are now cancelled? (03/20/2020)**

TEA expects some flexibility in this area but know that your 2019-2020 federal grant funds generally have a 27-month life and this year's funds will carryover into next school year. For federal grants that have statutory limitations on carryover, TEA can issue Ed-Flex waivers. For grants that do not have statutory carryover limitations, TEA has flexibility to allow higher percentages than normal.

**3. What types of flexibility are available for federal funding? (03/20/2020)**

USDE is expected to issue guidance soon around types of allowable expenditures, such as for activities, services, or materials that may be cancelled. Please note the federal regulations do not allow a grantee to obligate federal grant funds for travel until the date the travel is taken so a grantee should not have travel obligations prior to the actual trip.

**4. Can any of the Hurricane Harvey recovery grant funds be used to support COVID-19 response activities? (03/27/2020)**

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.

**5. Do you expect current federal grant allocations to change due to COVID-19? (03/27/2020)**

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

**6. What potential impact will school closures have on federal grant funds? (03/27/2020)**

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.

District's planning process for the next school year may also need to be altered. 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.

**7. Can districts use federal grant funds to provide hotspots for students without home Internet access? (03/21/2020)**

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 will 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 this purpose: ESSA, Title I, Part A served Schoolwide campuses may use their Title I, Part A funds to provide internet hot spots 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 an implemented, there is not a supplanting issue.

**Note:** The campus may update their CNA to include new needs identified as a result of the COVID-19 pandemic. 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 internet hot spots this year or in the prior year.

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

## **EDGAR Requirements**

**1. Will there be any flexibility to federal EDGAR regulations around procurements, such as price quotes or competitive processes? (03/27/2020)**

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.

## Grant Deadline/Extensions

- 1. What specific grant programs do the deadline extensions announced by the Department of Grant Compliance and Administration (GCA) apply? (03/27/2020)**

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

Refer to Universal Errata #1, linked to the [TEA Grant Opportunities](#) page and to the [main GCA page](#) (where this FAQ is linked), for current information on deadline extensions.

- 2. Will grants with project end dates between now and September 2020 receive extensions to the end dates? (03/27/2020)**

As of March 27, 2020, grant project end dates have not been extended. TEA will offer as much flexibility as possible and is currently examining all options.

## Carryover

- 1. Will there be exceptions for carryover amounts for Title funds and grants? (03/20/2020)**

Yes. For federal grants like Title I, Part A that have statutory limitations on carryover, TEA can issue Ed-Flex waivers. For grants that do not have statutory carryover limitations, TEA has flexibility to allow higher percentages than normal.