

CRF Operation Connectivity Prior Purchase Reimbursement Program (PPRP)



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DEPARTMENT OF GRANT COMPLIANCE AND ADMINISTRATION

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Overview of CRF Funding

PPRP Program Guidelines

- Eligibility
- Generating Funding
- Uses of Funding

Application Process

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- Demo Submission Process

LEA Process Overview

- Application
- Invoice Upload
- Audit Review
- Payment

Compliance Requirements

- Reporting
- Monitoring
- Reminders



Overview of CARES Act, Coronavirus Relief Fund (CRF) Funding



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Third stimulus bill

Many different sources of funding

Several fund sources that may impact LEAs



• CRF funds retain their identification as federal funds and do not become state or local funds, even when reimbursing for something that state or local funds were originally expended for...



Section 5001, Coronavirus Relief Fund (CRF) – this funding is administered by the Governor's Office and is designated for state, high population county and city government uses

Governor and legislative leadership have approved an amount of the state's portion of the CRF for K-12 education





- Necessary expenditures incurred due to COVID-19 pandemic
- Allowable costs that were not accounted for in the most recently approved budget as of March 27, 2020*
- Allowable costs incurred March 1, 2020, through December 11, 2020

*Allowable uses must be supplemental

Specific Educational Uses of CRF Reimbursement Funds

From Treasury Guidance, LEAs may only use CRF funding for—

- Expenses to facilitate distance learning, including technological improvements, in connection with school closings to enable compliance with COVID-19 precautions, OR
- Other eligible expenditures include payroll and benefit costs of educational support staff or faculty *responsible for* developing online learning capabilities necessary to continue educational instruction in response to COVID-19-related school closures

TEA Unallowable CRF Uses of Grant Funds

 Payroll or benefits expenses for employees whose work duties are not substantially dedicated to mitigating or responding to the COVID-19 public health emergency (general LEA employees)

Duplication of Benefits (Double Dipping)

 Expenses that have been or will be reimbursed under any federal program, such as, but not limited to, ESSER, TDEM's LEA CRF
 Reimbursement program, or TEA's Op Conn
 Reimbursement program



Prior Purchase Reimbursement Program (PPRP) **Program Guidelines**



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No PNP Equitable Services Requirement

- Private school equitable services do not apply to CRF reimbursements (CARES Act, Section 5001)
- Private school equitable services only apply to GEERF and ESSER (CARES Act, Sections 18002 and 18003)



Who, What, and How... Three very different answers

Who is eligible to apply?

What expenses generate reimbursement funds?

How can the reimbursement funds be used by the LEA?



Eligibility – Who can apply for reimbursement?

> Any LEA that:

Generated eligible funding for PPRP

Regardless of Title I, Part A or ESSER or other program Eligibility



PPRP Expenditures Eligible for Reimbursement – What generates the reimbursement funding?

- Expenditures for all eligible devices* purchased by the LEA,
- Not including the Op Conn TEA bulk order purchases, and
- Expenditures incurred May 21 or later

*laptops, (including Chromebooks), tablets, and/or hot spots—required fees to make the device functional, such as Chromebook licenses, hot spot data plans and CIPA filtering, are allowable

TEAC Uses of CRF Reimbursement Funds – How can the LEA use the reimbursement funds?

- Funds used to reclassify the original expenditures; use federal reimbursement funds and free up other state/local funds.
 - Required for original expenses in the current fiscal year
 - Preferred for original expenses in the prior fiscal year, if the LEA can do so

TEAR Uses of CRF Reimbursement Funds – How can the LEA use the reimbursement funds?

If, due to timing of the original expense, the LEA cannot reclassify the original expenditures, then it must use reimbursement funding for other CRF-allowable activities—

- Expenses to facilitate distance learning, including technological improvements, in connection with school closings to enable compliance with COVID-19 precautions, OR
- Other eligible expenditures include payroll and benefit costs of educational support staff or faculty *responsible for* developing online learning capabilities necessary to continue educational instruction in response to COVID-19-related school closures



PPRP Expenditures NOT Eligible for Generating Reimbursement Funding

The following examples of expenditures are not eligible for generating reimbursement funding under PPRP; but *may* be an allowable use of the reimbursement funds:

- Desk top computers
- Monthly internet service (LEA general internet access)
- Cameras, microphones, other peripherals
- Op Conn Bulk Order purchases, local share of bulk order costs
- Student interactive devices
- Teacher interactive boards



- LEAs may receive 75% of the total expenditures submitted and cannot exceed the maximum reimbursement
- The 75% reimbursement amount may be
 - ratably reduced, or
 - ratably increased

based on applications received and reimbursements requested by LEAs



- Complete applications will be prioritized and processed for payment in three application periods
- Reimbursement percentages may vary between application periods based on funding requested
 - November 20 December 1
 - December 2 7
 - December 8 11



- LEAs may receive the greater of
 - \$300 per economically disadvantaged student count

or

• \$50,000



\$300 X Number of Eco Dis Students = Max Reimbursement*

*If max reimbursement is less than \$50,000, round up to \$50,000



\$300 X 3010 = \$903,000 # Eco Dis Students max reimbursement

LEA must submit \$1,204,000 in expenditures to receive \$903,000 (75% of total expenditures submitted)



\$300 X 100 = \$30,000* → \$50,000 # Eco Dis Students max reimbursement

*When max reimbursement calculation results in less than \$50,000, round up to \$50,000

LEA must submit \$66,667 in expenditures to receive \$50,000 (75% of total expenditures submitted)

PPRP Key Dates



*Reimbursement requests will be processed in the order received until all funds are expended

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LEA Process Overview



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TEA Application/Reimbursement Process

Application

Starting 11/20/2020—

- LEAs request and submit dynamic, online forms
- Signed by LEA authorized official through DocuSign

TEA To Request Reimbursement Application

- LEA sends email to <u>customerservice@teabulkorder.com</u> to request reimbursement application – starting at the end of this training
- All correspondence related to the reimbursement application will go through <u>customerservice@teabulkorder.com</u>, NOT direct to TEA staff
- LEA will receive email with link to pre-filled application



- Complete all sections of the application
- Authorized official sign in DocuSign
 - Authorized official must be a staff member who has been authorized by the superintendent or local school board to enter the LEA into legally binding agreements.
 - Certifies to 2 CFR 200.415 to ensure expenditures are proper in accordance with terms and conditions of funding



"'By signing this report, I certify to the best of my knowledge and belief that the report is true, complete, and accurate, and the expenditures, disbursements and cash receipts are for the purposes and objectives set forth in the terms and conditions of the Federal award. I am aware that any false, fictitious, or fraudulent information, or the omission of any material fact, may subject me to criminal, civil or administrative penalties for fraud, false statements, false claims or otherwise."

(U.S. Code Title 18, Section 1001 and Title 31, Sections 3729–3730 and 3801–3812).

TEA Application/Reimbursement Process

Application

Invoice Upload

Starting 11/20/2020-

- LEAs request and submit dynamic, online forms
- Signed by LEA authorized official through DocuSign

- Upload all invoices or billing statements
- No duplication of benefit from TDEM program, bulk-order, or LMRP



- At end of application process, LEA will receive a link to upload expenditure documentation
- Application will *not* be approved without the documentation upload

- LEA must upload invoice(s) or billing statement(s) by December 11, 2020
- TEA will monitor/audit in Spring 2021



Date of purchase

Type of device

Number of devices

Amount per device

The invoice or billing statement should also include an agreed upon "ship date"

TEA Application/Reimbursement Process

Application

Starting 11/20/2020-

- LEAs request and submit dynamic, online forms
- Signed by LEA authorized official through DocuSign

Reimbursement Funding

- Reviewed and approved by TEA staff;
- Processed FIFO
- Payment through TEA Accounting

Payment to LEAs

- Reimbursement payments to LEAs
- Fund Code 277
- Direct-deposit to LEA account on file with TEA



Application Completion and Submission Demo

Gaby Rowe



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Compliance Requirements



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FEDERAL

STATE

LOCAL



• OIG



- Department of Treasury Program Monitoring
- Any other federal agency charged with compliance



- Fiscal Monitoring
 - Desk reviews
 - Potential onsite review
- Program Validations
 - Targeted compliance checks, such as...
 - Use of reimbursement
 - Validate number of devices purchased and reimbursed
 - Etc.





Independent auditor may review

• Federal Internal Controls and Self-Monitoring







One quarterly report at end of the project



Due January 2021



CRF Quarterly Reports

At this time, TEA does not expect to need to collect further information from the LEAs for the required report.

It appears Treasury will collect the data listed in the CARES Act.

- the amount of funds received that were expended or obligated for each activity;
- a detailed list of all projects or activities for which funds were expended or obligated, including:
 - the name of the activity, and description of the activity



Who can assist with questions on the bulk order process and devices not yet received or our PPRP eligible orders where we have not yet received the devices?

Email <u>customerservice@teabulkorder.com</u> and explain your situation and questions. They may be able to assist with vendors.



Do purchases under the local share of the Op Conn TEA bulk order qualify for PPRP reimbursement?

No, PPRP eligibility is for purchases outside the bulk order purchase program.

The bulk order local match reimbursement program (LMRP) was available to assist with the local share of those purchases.



Can we purchase additional hotspots or devices after our bulk order purchase is received?

Yes, and if those devices can be received by 12/30/2020 then those purchases may be eligible for PPRP.

However, the bulk order program is closed. The LEA would order the devices on their own.



Can parents pay for insurance on devices or for the insurance portion on damaged devices?

Yes, if the parent chooses to do so.

The parent is not required to pay any insurance costs.



What timeframe of purchases does PPRP cover?

PPRP covers eligible device purchases May 21 and after.

Devices must have a commitment from the vendor to receive the device by 12/30/2020.

If shipments are delayed, <u>customerservice@teabulkorder.com</u> may be able to assist you in working with the vendors.



We ordered in August but due to shipping backlog the vendor estimates delivery mid-January. Can we apply?

Devices must have a commitment from the vendor to receive the device by 12/30/2020. If devices incur shipping delays, we may have limited flexibility to allow the LEA to receive the devices in early January.

If shipments are delayed, <u>customerservice@teabulkorder.com</u> may be able to assist you in working with the vendors.



We ordered early, but due to the total cost we agreed to a lease purchase payment plan over multiple years. Can we apply?

There appear to be only two options to apply.

- Submit only the current year amount of payments that have been made by the date you apply for PPRP
- 2. Pay off the lease purchase now and apply for 75% reimbursement of the full amount of the purchase

Contact customer service and we will call you to discuss your situation.



Do you really expect to ratably reduce the reimbursement percentage down to less than 75%?

Yes, we expect more requests than the \$420M appropriated for this program if the whole state applies and our survey data are accurate.

We hope to fully fund the first application period (11/20-12/1) at 75%, but expect to ratably reduce the reimbursement percentage in either the second and/or third application period



What are immediate next steps for my LEA?

- Email <u>customerservice@teabulkorder.com</u> to request the application, <u>even if you have already done so prior to this training</u>
- Identify an emergency contact who will be available during holidays/school closure
- Notify superintendent and any other Authorized Officials that may be signing and certifying the application
- Collect/organize invoices and/or billing statements that would qualify for this program



 All communications to TEA regarding the PPRP must be sent through the CRM at <u>customerservice@teabulkorder.com</u>

TEA will copy <u>customerservice@teabulkorder.com</u> on all responses

All documentation and tracking is available in the CRM



Customer Service Office will be closed 8pm to 7am daily

Limited customer service staff working on weekends, response emails may take an additional 24 hours



 Applicants should document other COVID-19 related expenditures for safely reopening schools (both remote and inperson instruction) if additional funding becomes available.



This presentation is intended solely to provide general information and guidance to Texas LEAs, ESCs, and participating Private Schools and reflects the Texas Education Agency's current understanding of the CARES Act and applicable federal guidance.

The content of this presentation is subject to change as a result of further potential information and guidance provided by federal agencies with regulatory oversight of CARES Act programs.

This presentation does not constitute legal advice, and LEAs are, therefore, advised to seek legal counsel regarding the information and guidance provided in this presentation before acting on such information and guidance.



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