

Date: April 29, 2024

Title: 032924-508507-DeptofEducation-Inviting

Speaker 0 00:00:00 Welcome and thank you for joining today's conference, consolidated Administrative Funds Tidings Waiver. Please note this conference is being recorded and all audio connections are muted at this time. If you require technical assistance, please open chat with the associated icon at the bottom of your screen and send a message to the event producer. You may also submit written questions throughout the conference by selecting all panelists from the dropdown menu in the chat panel. With that, I'll turn the conference over to Adam Shot, acting Assistant Secretary, office of Elementary and Secondary Education.

Speaker 1 00:00:37 Thank you, Candace. Uh, good afternoon or good morning, depending on where you're joining us from. On behalf of Secretary Cardona, thank you for all you are doing to administer Covid Relief, ESEA and other ED programs. The secretary came to the US Department of Education from an SEA. So did I, and so did my predecessor. We get that our work is dependent on yours, that virtually everything we are trying to do on behalf of kids and schools depends on your ability to implement it. We've tried to back that understanding up with actions, whether that's working to restructure OSCs Comprehensive Centers program to provide enhanced supports to states or proposing to adjust the long standing Title one administrative cap to provide LEA to provide SCAs, I'm sorry, with more capacity to administer programs that serve underserved kids or providing flexibilities like those. We'll walk through today. I want to hit two really brief points at the top.

Speaker 1 00:01:33 In the past, ED has offered sample templates to support states in making waiver requests, and I expect that one question we might get during the program today is why we didn't do that here. Just to be direct, earlier, pandemic era flexibilities have expired, and so it takes more time to develop and clear a document like that. And it was our sense that states want to move quickly on this front. So while we can't provide a sample template, we hope that last week's communication, today's webinar and support from our team will help every state gets to where it wants to go. Speaking of teamwork, we have all worked together over the past three years to communicate to sub-grantees that the September 30th, 2024 deadline for obligations cannot move, won't move. As you are evaluating whether this waiver makes sense for your state, in your context, and as you're planning for the public comment posting, please keep that fact front and center and underscore that this flexibility is for program administration funds only, and that all other funds must be obligated five months from tomorrow. With that quick introduction, I'm going to turn things over to Britt and Christopher from the SGR team to walk you through this flexibility.

Speaker 2 00:02:43 Thanks, Adam. Next slide, please, and good afternoon or good morning to all of you. We're so glad you could that so many of you could make it today. This is going to be a relatively brief presentation, allowing you much time for questions. Of course, we will post the slides and also share them with you via G six after the webinar. Next slide please. We want to remind you here that we, the department already provided the AR SER and ARP s grantees with the ability to consolidate their administrative funds. The policy we shared on Thursday extends that flexibility to the ARP Homeless Children and Youth Program or HCY program.

Speaker 2 00:03:28 Next slide, please. We also want to remind you of the administrative caps or the ceilings that apply to these three programs. So for arp, HCY, the Homeless Children Youth Program, the state education Agency may not use all of its state set aside for program admin. They

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can use, uh, the SCAs can use an amount that's necessary and reasonable to administer the program. For our best, sir, the, the allowances not more than or up to, and not more than half of 1% of the grant award for administrative purposes for ARP e emergency assistance for non-public schools, SEA may use, um, not use more than the greater of half of 1% or \$200,000 of its grant for administrative purposes. You, um, we also wanted to note again that you don't need to ask us permission to consolidate. Um, and you can do that at any time, which means that even if you didn't intend to consolidate, uh, sooner, you can still elect to do so now. And finally, I want to note that states that previously com consolidated our ESSER and RPS administrative funds that may have, um, that may have, or that may, may perhaps will exhaust those funds by September 30th, 2024, may still apply for a waiver to extend the period of availability for any remaining consolidated administrative funds under the ESEA in order to continue the administration of the three R programs discussed in the Dear Colleague letter. And here, next slide, please.

Speaker 2 00:05:15 Um, in order to consolidate administrative funds, we want to make sure you're aware that SCAs must be able to demonstrate that a majority of its administrative resources come from or are derived from non thorough resources. Also, we want to make note that states that do consolidate administrative funds are not required to track time and effort. The state educational agency does not have to provide evidence when they're, um, seeking a waiver of the fact that they, that the majority of their administrative resources have come from non-Federal force, uh, resources. However, we may review the administrative resources during regular program monitoring. So now I'm going to turn this over to Christopher Tate to talk about the kind of information that you will, um, be asked to include in your waiver requests. Christopher.

Speaker 3 00:06:15 Thank you, Brett. Now I'm going to share guidance for seeking a request, and we will, uh, share these slides as Brett mentioned immediately after today's presentation, so that you can use this guidance as you prepare your requests. Next slide, please. As noted in the department's Dear Colleague letter sent a state's last Thursday, the department is inviting states to seek a waiver of Section 4 21 B of the General Education Provisions Act. This will extend to the period of availability for ARP administrative funds and fiscal year 2022 ESCA program, administrative funds that they choose to consolidate under ESEA section 82 0 1. The funds may be extended through March 31st, 2026. The waiver extends the timeframe for obligating the funds to account for the work the SEA may need to do to collect report data and close out the grants during the late liquidation period. As Britt noted earlier, a state does not need a waiver to elect to consolidate administrative funds as this is already permitted by the ESEA.

Speaker 3 00:07:26 Next slide, please to request a tidings waiver for this purpose, we want to be clear that the instructions shared here are intended to streamline the request process absent a template, and then we also want to ensure that grantees receive approval for their request quickly. Again, we'll share these slides via email later today so that you have these instructions in hand. As you prepare your requests, a state may submit a single page request to waive the period of availability for the programs it chooses to consolidate through March 31st. The state's request must identify the programs for which the waiver is being requested. The request may include administrative funds consolidated under any of the ESEA programs noted here, and also any or all of the a RP programs are Pesa, rbe, and RHCY. Note that the state only needs to submit a single request for all programs that is intending to extend the period of availability for when emailing the states.

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Speaker 3 00:08:32 Our program, mailbox OSCs, office of State and Grantee Relations will coordinate with other program offices to ensure the period of availability is extended for all programs a state includes. And its request, the provision of additional information or the omission of information requested today could result in the delay of approval for a grantee's request. And again, we're aiming to move these requests through quite quickly, um, to ensure that states have the approvals in hand, they need to plan appropriately, uh, for the work that they will continue during the liquidation period. Um, and so with that in mind, I want to turn now to a couple of specific pieces of information that additionally need to be included in your request. Next slide, please. The waiver, the waiver request, excuse me, must also describe two items. First, how the waiver will advance student academic achievement, and second, also how schools will continue to provide assistance to the same populations served by the programs included in the waiver. The descriptions provided here need not be exhaust exhausted or exceptionally detailed. They must just simply describe each required EL element to be sufficient. Next slide please.

Speaker 3 00:10:00 Finally, an S E'S waiver must include these two assurances. First, the state must assure that it will use consolidated administrative funds under the respective programs in accordance with the provisions of all applicable statutes, regulations, program plans, and applications not subject to the, uh, to these waivers. And the state must assure that his provided the public and all LEAs in the state with notice of and the opportunity to comment on this request by posting the information regarding the waiver and the process for commenting on the state's website in the manner in which the SEA customarily provides such notice and opportunity to comment when submitting its waiver request. The SEA must enclose any comments received from the public and include a description of how the SEA addressed any such comments. Next slide, please.

Speaker 3 00:11:02 Finally, ENC close. When you're prepared to submit your request, please send the following three items to your state's mailbox using the address convention. Here you'll include the state's signed waiver request, any comments the state has received from the public specific to its request. And finally, the state's description of how it addressed any comments that it received. The department will quickly approve all complete requests. Do not be concerned about ensuring other program offices are aware of your submission. When you email the states, our mailbox OSCs office of state and grantee relations will again coordinate with these other program offices to ensure the period of availability is extended for all programs a state has included in its request and that other program offices are made aware of your state's intent. Next slide, please. And at this time, I'd just like to go ahead and open the line to questions.

Speaker 0 00:12:05 Just as a reminder, you can submit questions in chat to all panelists, or if you would prefer, you can click the hand icon at the bottom of the screen to go into the question queue and ask your question verbally.

Speaker 3 00:12:26 I do see a couple of questions, uh, coming into the chat.

Speaker 2 00:12:33 Yeah, Christopher, I can, um, with you. So the first question is, are there compelling reasons for SES to not combine administrative costs? I, I think <inaudible>

Speaker 3 00:12:51 I think it the, um, it would be very case specific about what your state's intended plan is to continue to implement, um, A SR ARP E and our HCY after the September, uh,

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September 30th deadline, when the administrative funds for those programs are no longer available. But we know that, you know, states will continue to manage, uh, the implementation of any associated closeout activities. And so it would be very much case specific with regard to the other resources that your state may have on hand to continue that work, um, for any of the personal services that will be required at the SEA level after September 30th.

Speaker 2 00:13:39 Thank you. Another question, um, does the request need to indicate the projected amount of funding being extended and or the timeframe over which the funds will be expended?

Speaker 3 00:13:55 It does not. Um, one, the request does not, um, require that. One thing that I will say though is that, um, if you, your state does OPT to seek a liquidation extension at that point, um, we might follow up to understand the additional funding that will be, um, liquidated over the associated timeframe as a way of understanding consistent with our implementation of those requests. Um, where, uh, when you may be submitting to us, um, a request to draw down funds that includes these additional administrative, um, a RP, uh, s er or HCY funds. And that's because our oversight process, um, for those states that, that have not sought an extension just so that you're aware when your extension is improved, the grant during the extended period goes on route payment. And so that what we do is that when you submit that request, um, into G six to liquidate those funds, you additionally flag for your program officer, um, the amounts associated at both the SEA and the sub-recipient level that are being drawn down at any given time. Um, and so we would just, um, use that as a mechanism for continued oversight for any administrative funds that are drawn down during that period.

Speaker 5 00:15:27 Thank you.

Speaker 2 00:15:28 Can you clarify if or how this allowance and expansion to consolidate administrative funds applies to subrecipients of the SCA for those entities that the SCA passes, uh, through funds to, especially for the, for these three programs, um, in, uh, in dis under discussion are beings our bets and R-B-H-C-Y.

Speaker 3 00:15:53 So I am going to kick that question over to, I believe we have one of our program attorneys.

Speaker 5 00:16:07 Hi. Hi, Christopher. You want you want me to, to take this?

Speaker 3 00:16:11 Yes. Would you please

Speaker 5 00:16:12 <laugh>? Sure. I'm not camera ready, so I'll stay off camera, but, okay. Yes. Um, so the, the waiver that we are inviting is only applicable to the state level consolidated administrative funds. We are not inviting a waiver with respect to any sub-recipient level admin funds. Um, the only other clarification I would offer is that the department has designated ARC funds and the, the ESEA funds under the statute may be consolidated the admin funds. So, um, LEAs, for example, already have the authority to consolidate the ARP s or admin funds with their ESEA admin funds, but the waiver extending the period of availability of funds only applies to the state level admin funds. I hope that answered the question.

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Speaker 2 00:17:01 Great. Thank you, Jane. Um, someone has asked where to find the link to the webinar. Um, as we noted, we will be sending, uh, the, the slides directly to you through G six. So anyone who is an authorized, uh, uh, state director or authorizing official in G six will get this directly. And then we will, as we always do, we'll echo it in our news flash, um, on Monday. Um, but we post these all on our deadlines and announcements page, um, and we can put a link to that in the chat as well. Um, I'm seeing questions just, uh, a thank you, um, and we're thrilled to provide you with some good news that will help you administer your programs during this period. Um, we have a,

Speaker 3 00:17:59 I'm sorry,

Speaker 2 00:18:01 Go ahead.

Speaker 3 00:18:02 I was going to say we have another question, um, coming in. How does consolidating impact reporting, for example, how do we respond to ED'S survey questions about the uses of Title two part A funds?

Speaker 2 00:18:18 I'm not going to, um, see if Patrick wants to address that.

Speaker 6 00:18:27 Sorry. Uh, hey everyone, this is Patrick Rooney. I think, um, if there are already questions about whether you are transferring funds from Title two to another program, I don't believe that the survey currently asks questions about whether you consolidate admin funds. Um, but I, I don't think this would impact that at all. because it's, this is just the, you know, the small amount of the Title two funds that you're using for administration. Um, I don't know that we would ask you to detail because you, you won't be able to, if you consolidate funds, uh, your admin funds, you won't be able to detail like, you know, which programs you're spending on administration. I think you would, you would answer to that survey question. The percentage of funds that you're spending on administrative activities would be the same. You know, they will lose their individual meaning as you are paying for your administrative costs at the SCA level. Um, but you won't necessarily say, you know, this much goes to the person who runs title two. You'd be spending it just generally on state administrative activities. Hopefully that answers your question.

Speaker 2 00:19:36 Thanks Patrick. And I'm going to go to a question that, um, is on the same topic while we're here, and then I'll go back to another question. But, so to clarify, if the SCA chooses to consolidate administrative funds, then they will not be required to track time and effort. Would this include salaries for personnel working on multiple cost objectives? IE esser administration and Title one A administration?

Speaker 6 00:20:06 Uh, I'm happy to take that one. Again, this is Patrick. That's correct. You would not have to track time and effort and you, um, essentially would be pulling all your, your administrative funds and then using them interchangeably to, to pay for the administrative activities that you are carrying out. So you could be, um, drawing down the programs one at a time as you go through them. Or you could just be, um, you know, proportionally taking from each of the programs during the year and, um, paying for all your administrative costs. You still have to do all of the administrative things you have to do for each of the programs, but you don't have to track time and effort to say how much time this person was working on Title two or Title one or a RP ser. Um, you would just be using the funds to, to pay for your administrative costs.

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Speaker 2 00:20:50 Thanks, Patrick. Um, going back to a previous question, which is specifically these funds would be for reporting, monitoring, closeout activities and not for continuing programs in LEAs. Correct. And I will go ahead and answer that and just say, yes, that is correct. Um, next question. If an SEA has consult, I'm sorry. If an SEA has consolidated our best or administrative funds and then determines that for the purposes of extending remaining funds, it would be helpful to un consolidate. Is that a problem?

Speaker 5 00:21:37 Brit? Britt, do you want me to hop in?

Speaker 2 00:21:39 Yeah, jump in, Jane.

Speaker 5 00:21:40 Yeah, I'm not sure I totally understand the question, but, um, just to be really clear, this waiver to extend the period of availability of funds only applies to the consolidated administrative funds. So to the extent that a state decided they don't want to consolidate their remaining or better admin funds, this waiver would not apply to those funds, and the remaining or better admin funds would have to be obligated for allowable administrative purposes for ARP SER specifically by September 30th of this year.

Speaker 2 00:22:09 Thanks, Jen Jane, um, there's another question about, um, whether or not LEAs are able to consolidate their, our better administrative funds with ESEA administrative funds. And as Jane already chimed in earlier, um, no, this waiver is specifically for, um, the SEA

Speaker 5 00:22:30 And bri. Can I offer one clarification just really quickly? Yes. The LEAs can consolidate their admin funds with ESEA funds. We permitted that. If you look back at the, um, Esser and Gear FAQs, there's an FA Q that makes that clear that an LEA may consolidate. Um, it's just the waiver extending the period of availability of funds does not apply at the LEA level.

Speaker 2 00:22:54 Thank you. Jane,

Speaker 3 00:23:02 I see Brent that we had a couple Oh, I'm sorry. Go ahead.

Speaker 2 00:23:05 Yeah, it says, uh, I, I see a question. It says with the comments from the public, is the department intending for SESS to have a specific public comment on the proposed waiver? So the

Speaker 3 00:23:20 SCA should, um, solicit com Oh, go

Speaker 2 00:23:25 Ahead. I, I guess, yeah, go ahead, Christopher. I guess I wasn't quite sure if the questioner was asking about, um, the public comment period that the state would initiate. Um, but let's assume it is, and I think you were going to answer that.

Speaker 3 00:23:43 Yes. And that is the, as that was the assumption that I was making, um, as well, is that the state would make public its waiver and solicit comment, um, in the way that it would, um, traditionally there isn't any sort of additional exceptional step that the state would need to take, um, to solicit feedback for the purposes of gathering comment on this waiver, which also gets at the second question is about, is there a requirement to hold a public hearing together, uh, public comment? Again, you would follow the, um, standard process that you would implement at the state level to solicit comment on these, uh, requests.

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Speaker 2 00:24:29 Um, another follow up question. Can consolidated funds just be our besser and other ARP administrative funds? Or must the consolidated funds include other title program administration?

Speaker 5 00:24:45 Um, I'm, I'm happy to hop in here as well. Um, it, it is completely fine for it just to be one or two programs, and it's fine if those are just the A programs. Just keep in mind the requirement under 82 0 1, all of the requirements under 82 0 1 apply to those consolidated administrative funds, even if they are just the ARC funds. So for example, um, in significantly the requirement that the majority of the state's admin resources be derived from non-federal sources, so all of the 82 0 1 consolidated admin requirements apply to whichever buckets of funds, um, you determine you're going to be consolidating. It is not required that those include all or even any of the ESEA programs.

Speaker 2 00:25:30 Thank you, Jane,

Speaker 6 00:25:31 Sorry, this is Patrick. Just to jump into that question, um, if you only consolidated your A RP ESS or E NS and HCY funds, keep in mind that period of obligation ends September 30th, 2024. The tings waiver that Christopher and Britt walked through, um, is if you consolidate with ESEA funds, you can then get a tings waiver for the ESCA funds, which would apply then to whatever you consolidate with the ESCA funds. So I, I think that, um, nuance is important.

Speaker 2 00:26:11 Thank you, Patrick. So I, I think I'm hearing here a distinction between folks, um, you know, whether they can consolidate, uh, uh, if, if they have to consolidate, um, all the programs or if they can pick and choose. Um, but even if they, my understanding is that even if they don't consolidate with ESE EA funds, if you decide to consolidate your A funds, you can still get the waiver. So do you want to say any more about that?

Speaker 5 00:26:45 Yeah, I mean, the, the, the waiver applies to any funds that are consolidated under section 82 0 1 of the ESEA. And so a state has discretion to determine among the programs that are permitted to be consolidated, which programs admin funds are going to include. Um, so in the hypothetical, and I will say maybe we need to follow up on this because we haven't discussed this exact hypothetical where there are no ESEA funds included in the 82 0 1 consolidation, but, so we can follow up and, and get back to you, but generally, states have discretion to determine which funds are consolidated under a D 2 0 1, among those that are permitted to be consolidated. And, um, we can follow up on sort of what that looks like with respect to the programs that ESCA programs and the programs that the secretary designates in addition to the 82, the ESEA programs and what that means for purposes of this waiver.

Speaker 2 00:27:46 Thanks, James. Um, I'm going to move to another question. So, how much detail for consolidated administrative expenditure will be required to be submitted to the US Department of Education with requests to draw down funds? This could be quite detailed.

Speaker 3 00:28:04 It's, so I'm going to jump in here. It would be, um, there is no documentation, uh, during a period of extension that would be required to be submitted by the state. Um, if we were to select a state for monitoring, we would, you know, have a sampling of, of documentation consistent with our general practice for monitoring, um, uh, an SEA, you know, for, for any purpose for any program here at the department. Um, but there would be no, again, no, uh, expectation that

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you would provide any documentation. What I was speaking about earlier is that during the period of a liquidation extension, because states are on route payment, they just send an email to their program officer indicating that they've initiated a draw down, and then within that, the body of that email, they simply list the entity and the amount to be drawn for that entity.

Speaker 3 00:29:05 Um, so that we have a comprised understanding of where those funds are going at the time of the liquidation consistent with the state's, uh, approved request. I say all that to say again, no additional documentation or clarification would be required, um, that what happens during our period of extension is, is, um, very much simply an email to us notifying of the intent to make the drawdown during that period of extension and a short list of the entities that will receive those funds so that we can ensure that the amounts, um, total and that the recipients listed in the request match the state's approved liquidation extension.

Speaker 2 00:29:53 Thanks, Christopher. We have a couple questions about the deadline or the, the, to submit a waiver. Would you address that?

Speaker 3 00:30:03 Sure. There is no deadline, uh, to submit a request. Um, we anticipate that some states that we've, uh, spoken with will move quite quickly. We certainly understand that there are other considerations happening, um, across states. And so there is no deadline, but we're prepared to start receiving them, um, as soon as states, uh, want to submit them. And obviously we'll continue to, uh, move forward with processing any requests that we receive, you know, when we receive them.

Speaker 2 00:30:37 Thank you. Does this, um, I assume waiver flexibility include IDA funds, if at the SEA the answer is no, this, this specific authority is, um, uh, related to the programs that we, um, shared in the, the slides, which we'll be sending out shortly after this webinar. Um, question, is this referring solely to administrative funds and not SEA activity funds?

Speaker 3 00:31:24 Yes. This waiver, uh, opportunity is only for administrative funds, activity funds, and other programmatic uses for, um, our sr, I'm sorry, ar SRR beings and our HCY, uh, funds all must be obligated by September 30th, 2024.

Speaker 2 00:31:47 Thank you. We have a question. Um, can personnel, other than those specifically administering, such as doing monitoring, closeout activities, et cetera, the grant be paid for through consolidated administrative funds? I'll, I'll jump in and just say that these funds, they, they are for the purpose of administering the program, and we address what that means in our FAQs. Um, if you need more specific guidance, uh, you have a specific case that you want to talk about, please email your state mailbox. But yes, these funds are administrative funds and they must continue to be used for administrative purposes.

Speaker 2 00:32:39 Uh, another question. Can we submit the Esser waiver separate from the title waiver? Um, I, I, I'm not sure what I think that I, I think that's a, that con that, that's a confusing question because, um, the whole purpose here is that if you have, if you have consolidated funds, then they've, they've been consolidated and, um, you're asking to, um, receive more time to spend them when, when you submit the waiver request. Um, if that doesn't address your question, um, please resubmit it. Um, there's a question that is very specific to the, a homeless Children and youth program about, um, you know, using them to the greatest extent possible to support children

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and youth. I would ask that you submit that question to your program officer, um, in the A HCY program, since that's a, uh, a program specific question. Um, there's

Speaker 3 00:34:00 A question. I see we have a,

Speaker 2 00:34:01 Oh, go ahead. No, finish. No,

Speaker 3 00:34:03 I was just going to say, um, I see that we have a question about the availability of admin funds post March 31st, 2026, given the current, uh, a RP timelines, um, at this time, we have, uh, not moved forward with inviting a waiver beyond March, uh, 31, 20 26. Um, we do recognize that there may be, uh, some considerations that we need to make, uh, beyond March 31st, 2026, but we are not prepared to speak to those at this time, and we will, uh, be providing more information about that in your future.

Speaker 2 00:34:42 Thank you. Um, there's a question that talks about, um, once the waiver, if, if approved, if, so, if an SEA submits a request for a waiver, it's approved, then the period of availability comes to an end. Would the SEA be free to revert back to a system that doesn't use a consolidation of administrative funds? How do we end the consolidation?

Speaker 6 00:35:12 This is Patrick. I, a, a state can elect to just stop consolidating its funds. I, I think that one simple way that occurs to me to do it would be, you know, if you were to consolidate your funds in FY 22, when you have your FY 23 grant, you can revert back to not consolidating the funds and then tracking time and effort and, um, the way you might have done it before this came along and you decided to consolidate now, um, you would do something similar, I would think, going at that point in time.

Speaker 2 00:35:48 Thanks, Patrick. Um, I see there were a few people, um, that who came in late, and hopefully you saw Chloe's note to everybody that we are emailing the slides to you, um, or I should say to grantees who are in G six, the state director and the authorizing official immediately after this presentation. And then in addition, we'll be posting them on our website and sending them out in the news flash. So, um, I believe Chloe put in the chat the link to our deadlines and announcements page on a, um, but if not, she'll, she'll put that in the chat. Um, but that's where you can find it if you're not, um, one of those authorized users in G six. Um, someone asked if we could spend a little more time with this statement about what are the requirements related to the percentage of state funds and eligibility for the waiver.

Speaker 2 00:36:44 We could go back to that slide. Um, would you mind going back to slide? I believe it's three, maybe it's, uh, two slide two. Nope, sorry. Four <laugh>. Thank you. Is it, I hope this is the slides you, um, are ref referring to. Um, but each of these programs, each of the A programs has a, a statutory requirement related to how much in funding a state can set aside for program administration. And so these ceilings or caps, um, apply still, um, that doesn't change. So it, in order to be e to further that thought on the question, um, in order to be eligible for the waiver, you have to have, um, or moving forward consolidate your administrative funds. If there's more, um, that you want us to address on that, please, please, uh, ask a follow up question. Um, another question. So ARP and E-S-E-A-F-F-F-Y 22 administrative funds period of availability could be included in the core request. Do we need to report? We are going to consolidate before requesting the waiver. If we do not already, mark,

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Speaker 3 00:38:31 You wouldn't need to, um, provide that information to us prior to submitting your waiver. Um, as we note in the presentation that we'll share with you, one of the slides, lists all of the programs that you might opt to consolidate. What we would anticipate is that when you submit your, um, waiver requests to us, that the request will include those programs for which you are seeking the waiver to extend the period of availability, uh, for those administrative funds. Um, so you know, that is the same letter that you'll, um, receive public comment on. So there's no need to let us know of your intent, um, to consolidate for any of those programs prior to submitting your, your waiver request.

Speaker 2 00:39:19 Thanks Christopher. And, um, to those of you who are asking where you'll be able to find the slides in the webinar, Chloe has posted that link in the chat, so hopefully you can see that. Um, so somebody asked, what if you did not consolidate the funds from the start of the grant, but would like to ask for a waiver? So, um, per this, uh, flexibility, you are still able to consolidate funds even if you didn't do so at the min at beginning of your grants. And you do not have to ask us permission to consolidate, you can do it at any time. Um, it's the waiver for the additional time to spend those funds that you need to, um, send us a waiver request for request for. Um, there's a question. If we are approved for the waiver and need to submit a late liquidation request for ARP SR or E ns, how do we report administrative funds on the late liquidation request?

Speaker 3 00:40:38 Sure, that's a really easy one. Um, if you choose to seek, um, a late liquidation request within the request template, we have a tab that's specifically related to, um, the funds that a grantee intends to use during that period of extension. What we would ask is that you adjust, include a line item there, item, um, you know, indicating the total amount of funds to be liquidated during the, uh, period of extension. So it's as simple as that. The one question that came up in our liquidation extension office hours, um, last week is that I, I want to make clear that the approval of either this waiver, um, or the liquidation extension there are independent. So you need not have one to request the other.

Speaker 2 00:41:36 Thanks, Christopher. Um, here's a question. Will the extension of the period of availability also apply to the ESEA titles that were consolidated? So I think that's the whole, you know, that by nature when, when you consolidate funds, they, they lose their identity. And so, um, the extension of the, if you, if, if you first consolidate funds and then you apply for a waiver and receive a waiver, then that a wa that waiver applies to all the funds that you have consolidated. Um, here's a question. Are consolidated state admin funds subject to supplanting rules? I'm not sure what that context, what the context would be in that case. Um, so unless one of my colleagues, um, understands what the a, a context would be, then I would going to ask you to send that question to your state mailbox.

Speaker 3 00:42:59 Um, Brett, one quick item. I did send a note to the, um, event host and just ask that she progressed the slides to slide seven, um, to again reiterate and illustrate the programs that, that, um, are eligible to be waived here if consolidated, so that they can, uh, seek the extension since we've had several questions on that.

Speaker 2 00:43:28 Super.

Speaker 3 00:43:42 Do we have any folks, uh, who have their hands, hands raised, Candace, that may wish to ask a question?

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Speaker 2 00:43:50 There's no one in queue at this time.

Speaker 3 00:43:53 Thank you.

Speaker 2 00:44:03 It, it, someone in the chat noted that there was a sentence that someone stated that prompted a question about, um, whether or not there are circumstances in which an SCA is not eligible for this waiver. Um, and I would just say I, I think that's a, um, if you could provide more detail about a specific situation, um, I'm, I'm not sure which sentence you're referring to there, there. So I, I don't want to take a shot in the dark. Um, so please just restate the question, um, specifically as specifically as possible. Thank you,

Speaker 5 00:44:44 Brit. I, yes, I think the, I think the question was actually about the requirement in 82 0 1, that the majority of resources for administration, um, be derived from non-federal sources. Okay. Um, so, so just to say a little bit more, there is a requirement in section 82 0 1 of the ESEA, that's the section that permits, um, consolidation for state admin. Um, and that requirement is not specific to the waiver, it's specific to consolidating state administrative funds. Whenever a state consolidates to state administrative funds under section 82 0 1, there is this requirement that the majority of resources for administration be derived from non-federal sources. So that's not a new requirement, it's not a waiver specific requirement, but it does apply, um, in order for a state to be permitted to consolidate. And that's true for regardless of arc. That was true. That's true. If a state's just consolidating it's Title one, title two and title three state admin funds, for example.

Speaker 2 00:45:45 Thanks Jane. Um, there's a question in the chat that says if we would be consolidating for the first time, when would the consolidation start now or after we get the waiver approved? Um, again, on an earlier slide, we noted that, um, you have the ability to consolidate at any time. You could have done it, you know, when we first announced the, um, the, the, your, that flexibility. And, but even if you didn't do it, then you can do it at any time. Um, so, uh, and you don't need our permission to do it. So go ahead and consolidate and then submit your waiver.

Speaker 3 00:46:30 Brett, we had another question that came into the chat, um, from someone who joined the presentation, uh, late. And the question was, could we choose to consolidate any programs from the, from the list and request a waiver for those consolidated funds? Is that correct? Also, uh, is McKinney-Vento not included? Um, so I'll answer the first question, then I'll kick it over to, to Jane or Patrick to answer the second question related to McKinney-Vento. Um, yes, you may choose, um, to request a waiver for any of the consolidated, uh, program administrative funds from the programs that are listed, uh, here on this slide with regard to McKinney-Vento, uh, Patrick or Jane, do you

Speaker 5 00:47:17 Yeah,

Speaker 3 00:47:18 Just speak more to that. Oh,

Speaker 5 00:47:19 Patrick, do you want, go

Speaker 6 00:47:21 Ahead. This is Patrick McKinney. Bento is not included on this list. Uh, it is not one of the programs that is, um, designated by secretary to be included in the consolidation of

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state admin funds. So at this time, you could not include McKinney Bento, but the rest of the programs listed could be included.

Speaker 3 00:47:48 I think we, um, so all of the, any of the administrative funds on the slot on the, uh, on this list can be consolidated. Um, so that includes both the ESEA programs listed and the, uh, art programs that are listed as well.

Speaker 2 00:48:31 So there's a specific question about AR beings funds that have re reverted to the governor, um, for allowable uses under gear. And, um, I think it, the, I'm assuming the question is specific to, um, you know, that, that there's a need to use administrative funds for those, um, the administration of those funds. Um, I'm going to ask you to send, um, that question to your state mailbox, but the second question says, can the Governor's office request extension on administrative funds for closing out funds without consolidating? No. The answer is no. This, this, um, flexibility applies to funds that you have consolidated.

Speaker 3 00:50:16 I do see one additional question that just came in. Um, are there any additional requirements for requesting this waiver to be used for bipartisan safer Community Acts funds? And I'm going to have to phone in front on this one.

Speaker 5 00:50:48 Um, we can follow up. I meant, um, I know those funds were allocated as part of, and Patrick maybe, you know, title four part A and so to, oh, um, I let, let us follow up because I don't know enough about the BSEA programs to know if they're considered. I, I, I, unless anyone else knows, I don't know the answer, so we can follow up on that. Okay.

Speaker 6 00:51:11 The short answer for Title IV part B, which was a small part of the Bipartisan Safer Communities Act funds, is that they were obligated and became Title four Part B funds in addition to the rest of the, the grant funds. Uh, I think we'd need to check to make sure that definitely happened for the Title four part A piece, which was the much larger piece. Um, but I believe it, I believe it was. And so if you were to consolidate those programs with your other funds and the a RP funds, um, and then request a tings waiver, then you could use them for administration. But we, we can confirm that and then send out a clarification if we need to.

Speaker 3 00:51:50 Uh, Michael, can I just ask, I, I know that you're the person who submitted the chat, uh, or I'm sorry, the question in the chat, if you could also email that question to your, um, program officer and that way we can make sure that we get a response back to you that would be helpful.

Speaker 2 00:52:24 Again, there's a question about, you know, do we have to consolidate or can we just request the TIDINGS waiver for just our, as our administrative funds, for example. So the order of operations is that this is, um, uh, this flexibility of more time is applicable to funds that have been consolidated. So no, you cannot request a, a waiver, a time waiver for just arps or administrative funds, for example, or just a E NS administration straight funds or arp, HCY administrative funds. You first have to consolidate the funds because this flexibility is, uh, connected to the ESCA programs. Um, I also manage SCG, I'm sorry, what are SCG funds? I'm not sure what SCG funds are. So stronger Connection grant,

Speaker 6 00:53:34 Sorry, Brett. There was a, um, a question of right before that that came in about the, when the consolidated funds can be drawn down and whether March 31st, 2026 is the

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last day they can be drawn. And it's, um, if you ask for a TIGHTENINGS waiver for your consolidated administrative funds through March 31st, 2026, that would be the period of obligation. And then you will have 120 days to liquidate per the, um, the liquidation period in Edgar. So that, that would apply at that point for the liquidation periods at the end of whenever the obligation period ends

Speaker 2 00:54:15 There, there's still a number of questions about which programs are eligible for this flexibility. And slide seven, which is on the screen right now, um, shows you which programs the three are programs and the eight under the ESCA. So other programs not included on this slide are not eligible for this flexibility that we're discussing today.

Speaker 3 00:54:59 So Brent, we are, um, nearing the end of the hour. I think we're getting close to having responded to all of the questions, uh, that have come in. If, if we have missed your question or, um, when you receive the materials, you have further questions, um, please reach out to your, uh, program officer at your state mailbox and I'm going to ask if we can go to the, um, I believe it's the ninth slide to just remind folks before we close, um, sorry, it's the 10th slide. Um, again, when submitting, uh, any questions that you have, please feel free to reach out to your program officer via your state mailbox. So that's state name dot oe@ed.gov. And that will ensure that we, um, track your question and get a response back to you as quickly as possible. Um, if you have questions, um, as you're flipping through today's slide deck about, um, what it, what, what to include in your request or the submission process, again, encourage you to reach out to, to our office. We will be coordinating with other program, offices, offices as we receive your requests and move them forward for approval. Um, so please know that we're endeavoring to, to get approvals back to states quickly and ensure that we are coordinating internally so that we're sharing out all of the information pertinent to each of your individual requests.

Speaker 3 00:56:33 So with that, thank you for, for your time and please look for these slides to be shared out, um, later this afternoon. Thank you.

Speaker 0 00:56:42 That concludes our conference. Thank you for using in teller events. You may now disconnect.