



FAQ - Coronavirus Relief Fund (CRF) for Local Education Agencies (LEAs)

As of September 15, 2020

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Question 1: Where can I find additional information on CRF funding?**Answer**

The Treasury Department has provided guidance and an FAQ on the CRF program at: <https://home.treasury.gov/policy-issues/cares/state-and-local-governments>. Please note that the eligibility timeframe referenced by the Treasury Department is not applicable to CRF funds being provided to the State of Texas and utilized by LEAs. LEAs receiving CRF funding from TDEM may only use them for eligible expenses incurred between March 1 and May 20, 2020. Additionally, all reimbursement requests must be submitted by September 30, 2020.

Question 2: How does this program relate to the other CRF funding that has been allocated to local municipalities?**Answer**

While the Treasury Department is the source of all CRF funding, allocations to local municipalities are subject to the discretion of each individual jurisdiction. LEAs may reach out to jurisdictions that received CRF allocations to see if they can provide a portion of their funds for the LEA. These funds could then be used for any eligible expenditures incurred during the period of March 1 through December 30, 2020.

Question 3: Are there any special considerations for LEAs seeking reimbursements from multiple sources?**Answer**

When LEAs use multiple funding sources to pay for COVID-19-related expenses, they must ensure that there is no duplication of benefits. This means that if an expense or part of an expense is paid for by another source, this expense or portion of the expense can no longer be claimed under the CRF as it is already being paid for by another source. No expenses that have been or will be reimbursed under any source, such as insurance or any other federal grant program, may also be reimbursed through the CRF. For instance, if an LEA purchased \$10,000 of laptops or iPads and received \$2,000 in insurance proceeds for these items, CRF funds could only be used to reimburse the remaining \$8,000.

Question 4: If an LEA purchased laptops for students to engage in online classes, are these eligible for reimbursement through the CRF?**Answer**

Yes, this would be considered an eligible expense to facilitate distance learning, including technological improvements, in connection with school closings to enable compliance with COVID-19 precautions.



Question 5: Can funds be used to reimburse budgeted purchases or payroll expenses?**Answer**

CRF funds may only be used to cover costs that were not accounted for in the budget most recently approved as of March 27, 2020 for the LEA.

The Treasury Department has provided guidance that a cost meets this requirement if either (a) the cost cannot lawfully be funded using a line item, allotment, or allocation within that budget, or (b) the cost is for a substantially different use from any expected use of funds in such a line item, allotment, or allocation.

Costs incurred for a “substantially different use” include, but are not necessarily limited to, costs of personnel and services that were budgeted for in the most recently approved budget but which, due entirely to the COVID-19 public health emergency, have been diverted to substantially different functions. This would include, for example, the costs of diverting educational support staff or faculty to develop online learning capabilities, such as through providing information technology support that is not part of the staff or faculty’s ordinary responsibilities. Note that a public function does not become a “substantially different use” merely because it is provided from a different location or through a different manner. For example, although developing online instruction capabilities may be a substantially different use of funds, online instruction itself is not a substantially different use of public funds than classroom instruction.

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Question 6: What payroll expenses are eligible for reimbursement?**Answer**

Funds can be used for the unbudgeted payroll expenses of any personnel whose services were substantially dedicated to mitigating or responding to the COVID-19 public health emergency during the period of March 1 through May 20, 2020.

The Treasury Department has not developed a precise definition of what “substantially dedicated” means given that there is not a precise way to define this term across different employment types. Therefore, each LEA should maintain documentation of the “substantially dedicated” conclusion with respect to its employees and include this documentation when requesting reimbursement. The documentation may include a detailed narrative, activity logs, payroll hourly breakdowns, or any other information that would allow a reasonable conclusion that the employees were substantially dedicated to mitigating or responding to COVID-19.

If an employee is not substantially dedicated to mitigating or responding to the COVID-19 public health emergency, his or her payroll benefits may not be covered in full; however, a portion of such expenses may be able to be covered.

If an employee is not substantially dedicated to mitigating or responding to the COVID-19 public health emergency, his or her payroll and benefits expenses may not be covered in full by the CRF. However, a jurisdiction may track time spent by employees related to COVID-19 and request reimbursement for those costs as long as it is doing so consistently.

This means, for example, that an LEA could be reimbursed for payroll expenses allocated on an hourly



basis to employees' time dedicated to mitigating or responding to the COVID-19 public health emergency.

Question 7: If an LEA received donated resources, may they be reimbursed through the CRF?

Answer

No, the CRF cannot be used to reimburse donors for donated items or services.

Question 8: Can I use CRF LEA funds for the local share of my FEMA Public Assistance projects?

Answer

No. Under the terms and conditions of this funding, LEAs may not use CRF to meet the FEMA PA match requirement.

Question 9: In instances where a city or county has provided a portion of its CRF funding to an LEA, can those funds be used for the local share of its FEMA Public Assistance projects?

Answer

Some cities and counties that received CRF funding from TDEM may elect to designate a portion of their funding to LEAs within their geographic footprint. These funds are subject to different terms and conditions and may be used to meet the FEMA PA local share. Please refer to the TDEM FAQ located at <https://tdem.texas.gov/crf/>, which addresses the CRF allocation made to local jurisdictions.

Question 10: Is there a cost share requirement for CRF LEA funds?

Answer

TDEM will provide funding up to 75% of eligible expenditures, to be reimbursed subject to a cap per LEA and subject to CRF funding availability. Each LEA will be capped at a reimbursement amount equal to the greater of \$50,000 or \$250 per compensatory education (SCE) student in the LEA.

The application and reimbursement request submission period will close at 5:00 pm on September 30, 2020. At the end of this period, the statewide LEA funding requested will be reviewed and finalized.



Question 11: Can expenses that were incurred because of school closures that would not have occurred otherwise be an allowable expense, such as postage for having to mail packets to students?

Answer

Yes, this would be an allowable expense assuming it was necessary due to COVID-19-related school closures and incurred between March 1 and May 20, 2020.

Question 12: How do I submit a request for funding?

Answer

All funding requests will be submitted through TDEM's Grants Management System (GMS). TDEM has prepared job aids that provide step-by-step instructions on how to navigate through GMS. All job aids may be found at <https://grants.tdem.texas.gov/site/Job%20Aids.cfm>. Additionally, job aids specific to the CRF LEA process are referenced in this document.

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Question 13: How do I access the Grants Management System (GMS)?

Answer

LEAs may access GMS by navigating to <https://grants.tdem.texas.gov/> and either signing into an existing account or registering for a new one. Entities without an account will need to request access to the Texas Grants Management System as soon as possible. Accessing the system is a two-step process:

1. Complete the steps described in the Register for GMS Access Job Aid available at <https://grants.tdem.texas.gov/downloads/public.cfm?file=Job%20Aid%20%2D%20Access%20%2D%20Register%20for%20GMS%20Access%5FMarch%202020%2Epdf>
2. Complete and email in the Designation of Account Approval form. The form and instructions are at <https://grants.tdem.texas.gov/downloads/public.cfm?file=Form%20%2D%20Other%20%2D%20Designation%20of%20Account%20Approval%20Form%20June%202020%2Epdf>

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Question 14: How do I open a GMS Account?

Answer

After you receive access to the system, you will next need to request funding assistance in GMS under disaster LEA2020. TDEM has created an instructional job aid to facilitate this process: <https://grants.tdem.texas.gov/downloads/public.cfm?file=Job%20Aid%20%2D%20Request%20Funding%20Assistance%2Epdf>

You will then need to upload your application documents directly to your account. To help facilitate this process, TDEM has prepared a step-by-step job aide tutorial detailing account activation that is found at:



<https://grants.tdem.texas.gov/downloads/public.cfm?file=Program%20Specific%20%2D%20Coronavirus%20Relief%20Fund%20Local%20Education%20Agencies%20Targeted%20Account%20Activation%20Training%2Emp4>

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Question 15: How do I enter costs into GMS?

Answer

Costs are entered into GMS by the creation of individual expense entries. The expense entries are then converted to Requests for Reimbursement (RFRs) and submitted for eligibility review. In conjunction with each reimbursement request, you will complete the Payment of Funds Request Form and upload that to the RFR level in GMS. This must be completed by September 30th.

Please refer to the below job aids:

<https://grants.tdem.texas.gov/downloads/public.cfm?file=Job%20Aid%20%2D%20Financials%20%2D%20Create%20a%20New%20Expense%5FOct%202019%2Epdf>

<https://grants.tdem.texas.gov/downloads/public.cfm?file=Job%20Aid%20%2D%20Financials%20%2D%20Convert%20Expenses%20to%20a%20Reimbursement%20Request%5FOct%202019%2Epdf>

Additionally, TDEM has prepared a step-by-step job aide tutorial describing this expense entry process at: <https://grants.tdem.texas.gov/downloads/public.cfm?file=Job%20Aid%20%2D%20CRF%20%2D%20CRF%20Expense%20Entry%20and%20Reimbursement%20Request%20Tutorial%20%28Video%29%2Emp4>

Question 16: Is there training available?

Answer

Yes. TDEM has begun hosting COVID-19 FEMA-Public Assistance and Treasury Coronavirus Relief Fund (CRF) Training on TDEM's Grants Management System (GMS). These calls will occur each Tuesday, Wednesday, and Thursday at 1:00 pm until further notice. Please visit the link below to register for the COVID-19 FEMA-Public Assistance and Treasury Coronavirus Relief Fund (CRF) Training on TDEM's Grants Management System: <https://zoom.us/meeting/register/tJYpfu6urDqvG93eNoD578Ldt7F0yjOQnto8>. Once you complete your registration, you will be provided a Meeting Link, Meeting ID and Meeting Password.

Question 17: What documents have to be uploaded into the Grants Management System?

Answer

LEAs should upload all relevant documentation that supports both the eligibility of the expenditure and the proof of payment. Source documentation must be provided for every expense claimed. TDEM has prepared a job aid that identifies the various documentation requirements. This job aid may be found at: <https://grants.tdem.texas.gov/downloads/public.cfm?file=Job%20Aid%20%2D%20Program%20Specific%2>



[0%2D%20LEA%20Reimbursement%20Request%20Documentation%20Requirements%20July%202020%2Epdf.](#)

Question 18: Do I have to upload all information at one time into GMS or can I add information as it is completed?

Answer

Expenses may be created as they are incurred. However, all expenses must be converted to RFRs and submitted for reimbursement by September 30, 2020.

Question 19: What types of expenses are acceptable?

Answer

CRF-LEA funding may be used to reimburse LEAs for incurring eligible unbudgeted expenses between March 1 and May 20, 2020.

These expenses will primarily fall into the following two categories:

1. Expenses to facilitate distance learning, including technological improvements, in connection with school closings to enable compliance with COVID-19 precautions.
2. 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.

LEAs may also seek reimbursement for other categories of expenses identified by the Treasury Department. A list of expense categories may be found at this [link](#). Given the limited and retrospective eligibility period for this program, however, TDEM expects most expenses to fall within the two categories identified above.

Unallowable uses of funds include:

1. Expenses for the State share of Medicaid
2. Damages covered by insurance
3. 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)

The U.S. Treasury Office of Inspector General has oversight for determining allowability of costs and will recoup any funds determined to not be allowable.



Question 20: When will I receive funding?**Answer**

After September 30, 2020, TDEM will reimburse eligible costs by performing a review of the documentation that has been submitted for reimbursement. During the review process, TDEM may require additional information or supporting documentation to verify eligibility. Once the review process has completed, a payment will be electronically issued to the LEA.

Question 21: What is the last date that our district can submit expenses?**Answer**

All requests for reimbursement must be submitted by September 30, 2020.

Question 22: Is registration on SAM.gov required?**Answer**

Yes. The Terms and Conditions require all LEAs to comply with requirements regarding registration with the System for Award Management (SAM.gov). These requirements include maintaining an active registration and ensuring all associated information is up to date. TDEM will not issue payment until it can verify the registration is current.

Question 23: What is the definition of when a cost is "incurred"?**Answer**

Under this program, a cost "incurred" is defined as obligated by the LEA as of close of business on May 20, 2020. The federal term "obligated" means orders placed for property and services, contracts and subawards made, and similar transactions made during a specified period (from March 1, 2020, through May 20, 2020) that require payment by the LEA during the same or a future period.

Issuing a purchase order does not meet the federal definition of making an obligation. To be a binding obligation, the purchase order must be received and acknowledged by vendor.

The following chart reflects when an obligation is made, by federal regulations:



If the obligation is for—	The obligation is made—
(a) Acquisition of real or personal property	On the date on which the LEA makes a binding written commitment to acquire the property.
(b) Personal services by an employee of the LEA	When the services are performed.
(c) Personal services by a contractor who is not an employee of the LEA	On the date on which the LEA makes a binding written commitment to obtain the services.
(d) Performance of work other than personal services	On the date on which the LEA makes a binding written commitment to obtain the work.
(e) Public utility services	When the LEA receives the services.
(f) Travel	When the travel is taken.
(g) Rental of real or personal property	When the LEA uses the property.
(h) A pre-agreement (pre-award) cost that was properly approved by TEA under the cost principles in 2 CFR part 200, Subpart E—Cost Principles	On the first day of the performance period.

NEW
9/15/2020

Question 24: Is hazard pay or premium pay eligible for reimbursement?

Answer

Only in rare cases for LEAs. On September 2, the Treasury Department released updated guidance that limited which employees could be reimbursed for hazard pay under the CRF. Hazard pay may be covered if it is provided for performing hazardous duty or work involving physical hardship that in each case is related to COVID-19.

For example, the CRF may be used to cover hazard pay for a police officer coming in close contact with members of the public to enforce public health or public safety orders, but across-the-board hazard pay for all members of a police department regardless of their duties would not be able to be covered by the CRF.

For the purposes of this FAQ, premium pay is considered equivalent to hazard pay. Many LEAs provided premium pay to essential employees, such as child nutrition staff, during the end of the 2019 school year. However, the CRF does not take essential employees into consideration as a group. The CARES Act specifically limits payroll reimbursement to those employees whose work is substantially dedicated to mitigating or responding to COVID-19. Of that subset of employees, an LEA must be able to provide documentation of when and how each specific employee was performing hazardous duty or work involving physical hardship related to COVID-19 in order for TDEM to consider reimbursing premium pay or hazard pay.



Question 25: Who should I contact if I have any questions?

Answer

LEAs with questions should contact their Regional Unit Chief, as identified on the below map:

TDEM REGIONAL UNIT CHIEFS

Colleen O’Neal
Region 4 and 5
M: 806-740-8936
O: 806-474-4156
Colleen.Oneal@TDEM.texas.gov

Andrea Lowe
Region 1
M: 737-247-8531
O: 214-861-2057
Andrea.Lowe@TDEM.texas.gov

Judy Lucio
Region 3
M: 512-538-5382
O: 512-377-0016
Judy.Lucio@TDEM.texas.gov

Michelle Ellis
Region 2
M: 512-952-9061
Michelle.Ellis@TDEM.texas.gov

Daniella Scott
Regions 6 and 7
M: 737-229-0379
Daniella.Scott@TDEM.texas.gov

Additionally, LEAs may visit TDEM’s CRF for LEA website at <https://tdem.texas.gov/crf-lea/>.

