



# Texas Association of Community Schools

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**TACS COVID Debrief Notes**  
Updates from TEA COVID Webpage  
October 2, 2020

## **Hold Harmless Extended Six Weeks**

Yesterday TEA announced it would extend the current minimum funding guarantee established for the pandemic an additional six weeks, which for most, but not all districts, means a funding guarantee is in place for the entire first half of the school year. This “hold harmless” guarantee will only be available to school districts that offer in-person instruction for any Texas family that desires it. Districts must also demonstrate a good faith effort to allow for on-campus attendance. Remote instruction will also continue to be fully funded for those who wish to stay home for classes online. [Read more here.](#)

## **Updates to Instructional Continuity Planning Card**

TEA has added a couple questions on the [20-21 Asynchronous Plan FAQ](#).

**Question 12:** I submitted our district’s Asynchronous plan but can the agency let me know where our plan review is in the process?

If you received a confirmation email when you submitted your plan, it has been received. Please reach out to your ESC within one week after submitting for an update on where your plan is in the process.

**Question 23:** Our district is not ready to submit its Asynchronous plan by the October 1st deadline. Is it possible to submit the plan late?

October 1st was a target date for submission to ensure the district would have an approved plan by the end of the 3rd six weeks grace period. Districts can submit their plan after that date, but may have limited time to revise and resubmit should their plan not be approved after initial submission. We recommend districts submit as soon as possible to ensure approval prior to the end of the grace period.

## **Updates to Public Health Card**

A couple questions were added to the [Case Reporting and Enrollment Survey PDF](#).

**Question 8:** Will the hospitalization rate or death rate be included in this data set?

No, that information is not included in the report school districts must submit as part of the COVID-19 Public School Case Report form.

**Question 9:** Why are some districts’ COVID-19 case report dashboards different in format from the DSHS Texas Public School data display, and why do some of those district dashboards show different numbers than the state display provides?

Each school district can independently determine if it wants to share a separate dashboard. Because the information included in a district's dashboard is not standardized each school district can determine what type of info is collected and shared on its dashboard.

They've also added a bit of info to the [Case Reporting Instructions FAQ](#) on page 5:

**Question 8:** The data my district submitted in its COVID-19 Public School Case Report form does not match the data presented on the DSHS Texas Public School data display. Who does my district need to contact to correct or reconcile the numbers?

Please email <mailto:TCECSupport@dshs.texas.gov>. In that email, please ensure the information in the table below is included to ensure that DSHS has all the information to research and respond to your issue.

School district name: \_\_\_\_\_

School district CDCN: \_\_\_\_\_

Campus name Week in question (please include your specific case report number if you have it): \_\_\_\_\_

What you consider inaccurate or incorrect:

\_\_\_\_\_

### **Updates to Waivers, Finance, and Grants Card**

TEA has added one question to the [Federal Funding and Grants FAQ](#) on page 33.

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

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

They have also added a question to page 17 of the [CARES Act Funding and Expense Reimbursement FAQ](#).

**Question 5:** When must LEAs pay invoices related to expenses submitted to TDEM for reimbursement?

TDEM is aware that LEAs have submitted orders for remote learning equipment and received partial fulfillment of their orders to date, for which they may have provided partial payment. Continue to follow your existing procurement and payment policies. LEAs must document the obligation for the expense occurred during the allowable dates of March 1 through May 20, 2020. This guidance is not intended to mandate a 90-day liquidation period but reference a general expectation for when payments would be made. Funds must liquidate before December 30, 2020.

TEA has updated the [CARES Act Equitable Services FAQ](#) with more information about the new Federal Interim Rule (IFR) on page 2. They also added several new questions to this guidance under the *"Equitable Services for Participating PNP Students and Teachers"* section:

**Question 41:** What must an LEA revise if it followed ED's IFR calculation options prior to TEA's guidance on September 10?

The district will need to eventually do the following:

- Document updated and continuous consultation with PNP school(s) within the district's boundaries.

-Ensure all documentation is dated

- Collect applicable revised Title I, Part A low-income data from PNP schools residing within LEA boundaries (using one of the ESSA, Section 1117 calculation methods).

-This calculation must be completed by October 31, 2020, after new consultation with private school officials.

- Revise the PNP CARES Act ESSER Affirmation, resubmit at a later date to be determined by TEA.
- Amend the CARES Act, ESSER Application; submit at a later date to be determined by TEA.
- Keep all dated documentation on file for auditing purposes, including guidance during the applicability of the IFR and afterwards.

**Question 42:** What happens if the district calculated the equitable services amount under option 1b or 2 originally, and that was much more services than the new calculation provides, and the district has already provided more services to the PNPs than the new calculation allows?

TEA's guidance is that funds already expended would be allowable given the reasonable reliance on the regulation in place at the time. However, that would only apply to funds expended prior to September 10, 2020, when TEA revised its guidance. This is supported by USDE's recent policy letter.

For example, if the equitable service has been expended (paid) or already provided (delivered) to the PNP campus before September 10, 2020, the service was allowable and stays with the PNP campus through September 30, 2022. If the item has not been expended (paid) and has not been delivered to the PNP campus, the item should be recoded to a district campus and used accordingly.

**Question 43:** Should the district retrieve over-provided equitable services items or request reimbursement from the PNP when the district has already expended more on equitable services than the new Section 1117 calculation provides?

Unless specifically directed by TEA or USDE, the district does not retrieve equitable services items already distributed to the PNP campuses before September 10, 2020, or request any repayment from the PNP. If the PNP volunteers to reimburse the district for overpayment of equitable services it may do so, but it is not required and not to be requested by the district.

For eligible reimbursements to the PNP (eligible expenditures paid by the PNP between March 13, 2020, and the start date of ESSER consultation before September 10, 2020), the district may still reimburse the PNP if the commitment for the reimbursement was already made to the PNP prior to September 10, 2020, since the expenditure being reimbursed was paid during the allowable period of the IFR by the PNP.

**Question 44:** Can the ESSER grant serve only the low-income students who generate the equitable services allocation?

Yes, unless the district and private nonprofit school officials agree during consultation to utilize the proportionality method for calculating the number of low-income students in the private schools.

**Question 45:** Can the ESSER grant serve only the low-income students who generate the equitable services allocation?

No. While age 5-17 low-income students who 1) attend a PNP located within the district's 25 boundaries, and 2) reside in eligible Title I attendance areas within the district, generate the funding amount for ESSER equitable services; the ESSER grant can serve any student or staff member at a PNP, located within the district's boundaries, who chooses to participate in the ESSER equitable services program.

**Question 46:** What is a "Title I eligible attendance area" referred to in this guidance?

This means it's a campus attendance area (the geographical area in which the children reside who are assigned to that campus) in which the percentage of children from low-income families is at least as high as the percentage of children from low-income families served by the district as a whole. These campuses are Title I eligible attendance areas.

**To the Administrator Addressed**

The following new Texas Education Agency Correspondence has been posted at the TEA website:

Date	Title	Division
2020-10-01	<a href="#">Attendance Projections for the 2020-2021 and 2021-2022 School Years</a>	State Funding
2020-10-01	<a href="#">The University of Texas at Austin Automatic Admission Policy</a>	Share with high school junior-level students and their parents
2020-10-01	<a href="#">Competitive LOI Opportunity: Teacher Leadership</a>	Educator and Systems Support
2020-10-01	<a href="#">Validations of Fiscal Data Reported by LEAs for Federal Grants</a>	Federal Fiscal Compliance and Reporting
2020-10-01	<a href="#">Special Education Fiscal Compliance Survey Reporting Requirement</a>	Federal Fiscal Compliance and Reporting
2020-10-01	<a href="#">Bilingual Education Exceptions and English as a Second Language (ESL) Waivers</a>	Special Populations

**SBEC Meeting Agenda**

The State Board for Educator Certification will meet virtually October 9, 2020 at 8:30 AM. Information on joining the livestream and the full agenda can be found [here](#).

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*Disclaimer: This information is accurate as of October 1, 2020. It is intended for informational and educational purposes only, and is not a substitute for legal advice.*