The following questions have been compiled to assist LEA finance officers in determining the effects of the current health crisis on the financial records and reporting deadlines. The responses are based on the information available as of this date and may change as more guidance is provided by federal and state authorities.

**STATE ALLOTMENTS**

**Will QBE continue to be paid?**
Yes. There is no plan to limit payment of QBE based on school closures. GaDOE has taken steps to ensure the payments will continue monthly. The Amended FY 2020 adjustments were included in the March payment.

**Will the state categorical grant periods be extended to ensure the grant funds can be spent?**
Several LEAs have expressed a possible need for an extension to the June 30 deadline of a few state categorical grants, and GaDOE will provide guidance as soon as available. LEAs should continue to assume that the June 30 deadline still applies as of today.

**When will the FY 2021 QBE estimates be provided? Should we anticipate raises for our certified staff, transportation, and nutrition employees?**
The 2019-2020 legislative session was suspended after March 13, 2020. At that time, the House had released their recommendations for the FY 2021 Budget, and those recommendations did modify the budget as presented by the Governor. Because the FY 2021 Budget has not made its way through the complete legislative process, we cannot provide estimates. We encourage each district to review the budget tracking document, located on the House website: [http://www.house.ga.gov/budget/en-US/budgetdocuments.aspx](http://www.house.ga.gov/budget/en-US/budgetdocuments.aspx). If you have any questions, please contact FBO Budget Services or Financial Review.

**Should LEAs assume the FY 2021 QBE estimates will include salary increases?**
There has been no further communication regarding the FY 2021 Budget since the legislative session was suspended after March 13, 2020. However, Financial Review recommends LEAs plan on a very conservative budget for FY 2021, with no anticipated salary increases included in the state appropriations. If an LEA chooses to include salary increases in the local budget, the LEA should anticipate funding those salary increases with local funds.
FEDERAL GRANTS
What funding is available to the LEAs through the CARES Act?
The CARES Act includes $2.2 trillion in emergency funding.

The funding is allocated as follows:
- Approximately $104 million to the Governor’s Emergency Education Trust Fund, covering Pre-K, K-12, and higher education
- Approximately $450 million to the Georgia Department of Education
  - 90% allocated to districts as a formula grant, based on FY 2020 Title I allocations.
  - Estimated allotments have been shared with superintendents.

When will the funding be available?
GaDOE is still awaiting detailed guidance, assurances, and the application from the U.S. Department of Education (USED) for the state to apply for K-12 CARES Act funding. GaDOE is committed to a quick turnaround and will work in earnest to allocate funds to LEAs once they are made available from USED.

What activities are allowable to be funded with the CARES Act?
GaDOE is proactively planning to structure the CARES Act stimulus funding to LEAs to specifically address:
- At-risk student populations
- Distance learning
- School meals
- Mental health
- Supplemental learning
- Facilities and Equipment

Is the CARES Act Education Stabilization funding retroactive to cover expenditures already incurred?
We have requested clarification from the U.S. Department of Education on whether the funds can be used to account for expenditures incurred since the pandemic initiated. There may be expenditures that the LEA chooses to reclassify to the CARES Act program code.

How will the CARES Act funding be provided?
We are awaiting further guidance from the U.S. Department of Education, but we currently anticipate utilizing the budgetary infrastructure of the consolidated application to ensure all the requirements, including equitable services, are met.

Will the CARES Act require a completion report?
The CARES Act Education Stabilization funding will require a completion report. This will ensure GaDOE has the final expenditure reports necessary to report the use of the CARES Act K-12 funding to U.S. Department of Education.

Will the general federal grant periods be extended to ensure the grant funds can be spent?
GaDOE has received approval to extend grant periods for existing federal awards. Such extensions currently include federal formula-based grants that are set to expire on or before December 31, 2020, which would include current FY 20 formula grants to LEAs that expire on September 30, 2020. GaDOE will develop plans and procedures to allow these funds to extend for an additional 12-month period. At this time, it is unclear if the 2020 grants will be extended, or if the waiver to the carryover threshold will
be utilized to allow for the funds to be carried over to the 2021 grant period. The CARES Act is already set for a period through September 30, 2021, and can be extended to September 30, 2022. Additional guidance from our Federal Programs Division is forthcoming.

**Will the Title I limit of 15% carryover be waived?**
The GaDOE Federal Programs Department did receive approval to waive the limit of 15% for carryover of the 2020 grant award. Additional guidance from the Federal Programs Division is forthcoming.

**Will the cash drawdown process continue to operate in the same manner?**
Yes. Districts should continue to request cash drawdowns of all federal and state categorical grants using the same process used during normal operating times. GaDOE has put provisions in place to ensure cash drawdown requests continue to be processed each Thursday at 3 p.m. LEAs should ensure the cash drawdown requests are submitted prior to 3 p.m. each Thursday in order to be paid the following Thursday. Any questions regarding this process should be directed to Regina Hailey at rhailey@doe.k12.ga.us.

**Will the payment of salaries for employees, both exempt and non-exempt, be considered an allowable expense for the federal grants?**
The U.S. Office of Management and Budget has released guidance that the payment of salaries and benefits during the school closures is allowable with federal funds as long as the payments are consistent with the LEA’s policy of paying salaries (under unexpected or extraordinary circumstances) from all funding sources, federal and non-federal. Therefore, the LEA must consistently follow the same methodology in determining payment for salaries and benefits for employees paid with federal and non-federal funds.

**Does the CARES Act require continued payment of salaries for employees in order to be eligible to receive the funds?**
The CARES Act, section 18006, states the following: A local educational agency, State, institution of higher education, or other entity that receives funds under “Education Stabilization Fund”, shall to the greatest extent practicable, continue to pay its employees and contractors during the period of any disruptions or closures related to coronavirus.


> “in general, a grantee or subgrantee may continue to charge the compensation (including but not necessarily limited to salaries, wages, and fringe benefits) of its employees who are paid by a currently active grant funded by the Department to that grant, consistent with the organization’s policies and procedures for paying compensation from all funding sources, Federal and non-Federal, under unexpected or extraordinary circumstances. If a grantee or subgrantee does not currently have in place a policy that addresses extraordinary circumstances such as those caused by COVID-19, the grantee or subgrantee may amend or create a policy in order to put emergency contingencies in place for Federal and non-Federal similarly situated employees.”
“A grantee and subgrantee must maintain appropriate records and cost documentation as required by 2 CFR §200.302 (financial management), 2 CFR §200.430(i) (standards for documenting personnel expenses), and 2 CFR §200.333 (retention requirements for records) to substantiate the charging of any compensation costs related to interruption of operations or services.”

Based on the CARES Act and the guidance presented by U.S. Department of Education, GaDOE Financial Review recommends LEAs consult with their Board of Education’s legal counsel in developing and approving written policies for salary and fringe benefit payments during the time period affected by the COVID-19 pandemic. Because of the varying schedules, responsibilities, and shifts in job duties that have been implemented by each LEA, the guidance cannot be uniform for every LEA. Therefore, it is imperative that you follow the advice of your board attorney during the time of the school closures. All documentation supporting the decisions made on salary and fringe benefit payments must be maintained for Single Audit purposes.

**SCHOOL NUTRITION**

How do we account for the additional costs (salaries/supplies/transportation) related to the meal services while schools are closed?

The U.S. Department of Agriculture has released guidance to the Nutrition Departments that indicates the LEAs will operate during the school closure under the Summer Seamless Feeding Program. There are no additional reimbursements through the nutrition program for transportation costs, so LEAs should determine if the nutrition program income will pay for those costs or the General Fund. The same fund and program codes should be utilized for this program that are utilized for the Child Nutrition Cluster program. Guidance for the operations of the meal program should be sought and provided by the Nutrition Program Specialists at GaDOE.

Additionally, the CARES Act allows funding to be utilized for providing meals to eligible students. LEAs should seek guidance from the GaDOE Nutrition Division.

**SALARIES, TRAVEL AND PAYMENTS TO EMPLOYEES**

How should LEAs track the payment of leave in accordance with the Emergency Paid Sick Leave and Expanded Family and Medical Leave Acts?

If an employee is eligible for payment through either the emergency paid sick leave or expanded family and medical leave acts, the district should develop a new leave/pay code to differentiate the payment.

An LEA will most likely need three (3) new codes:
- One code for 100% of pay rate, up to the cap, for the emergency paid sick leave,
- One code for 2/3 of the rate of pay, up to the cap, for the emergency paid sick leave, and
- One code for 2/3 of the rate of pay, up to the cap, for the expanded family and medical leave.

Guidance on allowability of the paid leave for specific individuals should be provided by your school district legal counsel.

**Will LEAs be reimbursed for the payments of leave in accordance with the Emergency Paid Sick Leave and Expanded Family and Medical Leave Acts?**

The Families First Coronavirus Response Act includes provisions for tax credits for paid sick and paid family and medical leave. However, **LEAS are not eligible for that tax credit**. The Act, Sec. 7001 (e)(4)
states, “This credit shall not apply to the Government of the United States, the government of any State or political subdivisions thereof, or any agency or instrumentality of any of the foregoing.”

Will payments of leave in accordance with the Emergency Paid Sick Leave and Expanded Family and Medical Leave Acts be considered an allowable cost for the CARES Act Education Stabilization funding?
While the LEA is not eligible for the tax credit, the CARES Act Education Stabilization funding is an allowable funding source for the payments. The CARES Act, §18003(d)(12) indicates the use of funds includes “other activities that are necessary to maintain the operation of and continuity of services in local educational agencies and continuing to employ existing staff of the local educational agency.” However, the LEA should keep in mind that the leave paid is in lieu of salary, and an employee is only eligible if not currently being paid their salary. Therefore, the funding resources in FY 2020 that budgeted for salary payments could also support the emergency paid leave payments. The payment of the leave is also considered an allowable expense of other federal grants, to the extent the LEA’s local emergency plan is applied consistently to both federal and non-federal staff.

Will the payment of travel costs, conferences, etc. that have been cancelled but are nonrefundable be considered an allowable expenditure of state and/or federal funds?
Yes. Costs associated with the cancellation of events, travel or other activities necessary and reasonable will be an allowable expenditure of the General Fund. If there are services or goods that will be consumed by your LEA, and you are not sure of the allowability, please contact Financial Review and the assigned Program Specialist for the specific grant. The U.S. Office of Management and Budget released guidance specific to federal grants to indicate the SEA may allow recipients of grant funds to charge the full cost of cancellation when the event, travel, or other activities are conducted under the conditions of the grant. However, do not assume there will be additional funds available to carry out the purpose of the grant. There are no additional grant allocations as of the date of this document.

ACCOUNT CODES
What account codes do we utilize for extra goods/services directly related to the current health crisis?
For function/object codes, some suggestions include: 1) Function 2600 for additional cleaning/disinfecting. 2) Function 2100 for additional nursing services or supplies such as masks. 3) Expenditure object code 610 for general supplies. 4) Additional salaries will be reported based on the job duty associated with the activity.

What account codes have been created to track the CARES Act funding?
GaDOE Financial Review has created one new LEA Program Code:
• 4155 - Federal grant passed through GaDOE to support schools with the effects of the COVID-19 pandemic in compliance with the CARES Act. Fund 100, Effective FY 2020.

GaDOE Financial Review has created one new LEA Revenue Source Code:
• 4535 – Federal grants through GaDOE and any other agencies related to the COVID-19 pandemic.

The CARES Act Education Stabilization funding will be reported in Fund 100 on the DE 46 Annual Financial Report, similar to the reporting of the ARRA Educational Stabilization funding several years ago.
PROCUREMENT REQUIREMENTS
Is it acceptable to waive procurement requirements of the school district to purchase items in an emergency?
GaDOE Financial Review recommends following your local policy on emergency procurement purchases and obtaining board approval for those purchases outside the normal procurement process in accordance with the timeframe set forth in your local policy. Additionally, the Georgia Department of Administrative Services (DOAS) has guidance on their website for state agencies that may be followed by LEAs. This is the Georgia Purchasing Manual excerpt below regarding emergency purchases:

1.3.5 Emergency Purchases
In accordance with (O.C.G.A.) Section 50-5-71, State Purchasing Division has granted the authority to state entities to purchase urgently needed items arising from unforeseen causes, including, but not limited to, extreme weather conditions or official declared emergencies.

Emergency purchases are an exception to the Order of Precedence. An emergency procurement is handled outside of the normal competitive process for purchases greater than $24,999.99 because of the urgency of the circumstances, such as the immediate welfare of the general public. Therefore, State Purchasing Division approval is not required in advance of the emergency purchase. Poor planning or the pending expiration of funds does not constitute a valid justification for an emergency purchase. It is always good business practice and considered to be in the best interest of the state of Georgia to make any procurement as competitive as time permits. The state entity is authorized to handle the emergency purchase whether or not the dollar amount of the emergency purchase falls within the state entity’s delegated purchasing authority.

Additionally, DOAS has created an FAQ specifically regarding emergency purchases for state agencies that can be accessed here. Because these are guidelines for the state level that may conflict with your local emergency policy, please contact your board attorney with specific questions regarding the procurement procedures for your LEA.

BUDGET REQUIREMENTS
Will the budget requirements set forth in O.C.G.A. §20-2-167(a)(5) and §20-2-167.1 be waived for FY 2021?
The requirements to adopt a balanced budget in order to operate are still in effect. School systems are required to follow the budget requirements set forth in O.C.G.A. §20-2-167(a)(5) and §20-2-167.1 School systems may pass a Spending Resolution for each month in FY 2021 until a balanced budget is adopted at the local level. The GaDOE Financial Management Handbook for Georgia’s Local Units of Administration (FMGLUA), Section IV – Chapter 2, includes details on passing a Spending Resolution for each month of the fiscal year until an annual budget is adopted. Please see full chapter here.

Should LEAs continue with the plan to hold public meetings to adopt the budget prior to June 30, 2020?
LEAs have the ability to adopt a monthly spending resolution until the initial fiscal year budget is adopted. The spending resolutions can be adopted without the requirements of advertising and holding public meetings. The LEAs should adhere to the Governor’s orders of shelter-in-place and
should not jeopardize the safety of the community by hosting public meetings until it is considered safe to do so.

**DE046 AND OTHER FINANCIAL REPORTING ISSUES**

**Will the annual reporting deadlines for the FY 2020 Final Budget, the FY 2020 Final Actuals, and FY 2021 Initial Budget be extended?**
The GaDOE Financial Review Division is aware that the delay may result in districts being unable to meet the annual budget reporting requirements to GaDOE as outlined in State Board Rule 160-5-2-.21 and FMGLUA Section II - Chapter 6 in the time frame set. We will continue to monitor the situation and will amend your reporting deadlines to GaDOE as necessary.

**Are there specific reporting requirements related to the CARES Act K-12 Education Stabilization funding?**
Yes. The Office of Management and Budget (OMB) released Memo, M-20-21, dated April 10, 2020. That memo included specific reporting requirements for COVID-10 related expenditures. We are working with our IT staff to best determine the method to collect the additional information. It is the goal of the Georgia Department of Education to eliminate any unnecessary reporting obligations of the LEA while still complying with the directives required by federal agencies.

**AUDIT DEADLINES**

**Will audit deadlines for the FY 2019 and FY 2020 audit periods be extended?**
The U.S. Office of Management and Budget has released guidance indicating that the Single Audit submissions for fiscal year ends through June 30, 2020 may be extended 6 months beyond the normal due date (March 31st). However, the application of this extension is currently being reviewed by the Georgia Department of Audits and Accounts (DOAA), and any changes to the audit schedule must be communicated by their agency. The Georgia Department of Education is not the responsible party for setting the audit schedules and will update our deadlines for corrective action plans based on the deadlines set by DOAA. Additionally, DOAA released a memo dated April 1, 2020, outlining their plans for continued audit services during the COVID-19 Pandemic. Please direct any questions regarding the LEA’s FY 2019 audit to Sara Rohrbach at (404) 732-9198 or rohrbach@audits.ga.gov.

**RESOURCES**
- Georgia Department of Labor: [https://dol.georgia.gov/](https://dol.georgia.gov/)