



STATE OF MICHIGAN
DEPARTMENT OF EDUCATION
LANSING

GRETCHEN WHITMER
GOVERNOR

MICHAEL F. RICE, Ph.D.
STATE SUPERINTENDENT

MEMORANDUM

DATE: March 18, 2020

TO: Local and Intermediate School District Superintendents
Public School Academy Directors

FROM: Venessa A. Keesler, Ph.D., Deputy Superintendent *V. Keesler*
Division of Educator, Student, and School Supports

SUBJECT: Use of Federal Title Funds During Mandated COVID-19 Closure

The Michigan Department of Education (MDE) has received a number of inquiries regarding a mandated closure of schools due to a state or federally declared public health emergency and the potential impact of such closure in the use of federal Title funds. MDE is providing the following guidance to assist Local Education Agencies (LEAs) and Public School Academies (PSAs) with the implementation of federal programs.

1. May LEAs and PSAs use federal funds to compensate employees currently paid from these sources during the mandated school closings amid the COVID-19 pandemic?

Yes, LEAs may use federal funds to compensate employees who are currently paid from these sources. In other words, if an LEA has an employee currently paid using Title funds, it may continue to use Title funds to pay that employee during the period of closure. The Office of Educational Supports (OES) can work with districts individually on how to address questions related to allocating salaries and benefits to federal grants. OES will be providing additional resources in the coming weeks on this topic.

See Education General Administrative Regulations (EDGAR) 2 CFR 200.430(a)(1) and 2 CFR 200.431(a) for regulations.

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2. May an LEA or PSA use federal funds to cover fees associated with the cancellation of conferences and related travel expenses due to the COVID-19 pandemic?

Current guidance allows Title II, Part A funds to be carried over at 100% of the following year's allocations. At this time, MDE is waiting for clarification from the United States Department of Education (USED) on allowing these fees to be paid with 2019-20 funds.

3. Will LEAs be allowed a late amendment period to adjust the 2019-20 Consolidated Application due to the COVID-19 pandemic?

The Office of Educational Supports (OES) will allow late amendments once the COVID-19 pandemic school closures have been lifted. The OES will provide more information and timelines once determined.

4. Will any flexibility be provided regarding the 15% Title I, Part A

MDE is working with USED in requesting a statewide waiver to allow all LEAs to exceed the 15% carryover limitation on 2019-20 Title I, Part A funds into the 2020-21 program year.

5. Will private schools be able to carry over unused funds as a result of the COVID-19 pandemic?

MDE will direct LEAs to return to individual private schools any unspent 2019-20 funds allocated to that private school as direct carryover into the 2020-21 program year.

MDE will provide updated information as it becomes available.

For questions, please contact Shoua Vang, vangs1@michigan.gov.

cc: Michigan Education Alliance