

## ELC Reopening Schools FAQs

As of September 28, 2021

### Allowable costs

1. Will additional funds be awarded to support the ongoing testing in the 2021-2022 school year?
2. Can *ELC Reopening Schools* funds cover the cost of testing for individuals covered under the state employee health plan or other health insurance?
3. Can funds be used to follow-up on positive cases? Do the positive cases need to be identified through a screening testing program?
4. Is whole genome sequencing (WGS) allowable with these resources?

### Incentives

5. Can incentives be given to schools or may incentives only go to individuals?

### Issues with school recruitment

6. Some of our schools do not see a need to start testing now. Are we required to test a certain proportion of schools, students, teachers, or staff? How can we meet the requirements for Activity 3?
7. If we can't meet the requirements or can't get school districts to participate, how would that impact ELC funding?

### Support to school districts

8. If we contract with a university to conduct the testing of samples collected at schools, would that be covered under the 85% to school districts or the 15% that health departments can retain for administrative costs?
9. Is funding expected to go out individually to school districts? Or can they go out through state-wide contracts, labs, etc.?
10. Can this funding be used to support positions within the school?
11. If a lab is contracted by the state for the testing program (specimen collection, processing, lab testing, reporting), could a sliding scale based on school size (small, medium, large) be established to directly reimburse/compensate schools for their costs associated with screening testing?
12. If a school district wants to do diagnostic testing and not screening testing, can they use *ELC Reopening Schools* funds for testing and other prevention measures?
13. If a state wanted to expand NAAT testing capacity by equipping public health labs in a new state network, could these ELC funds be used to hire laboratory directors for these labs, provided the labs performed testing on samples from schools?

### Testing logistics and eligible events

14. Can funds be used to test during outbreaks or for symptomatic individuals?
15. Are we required to use any specific models (e.g., Operation Expanded Testing) to implement school testing?
16. Are we required to utilize any specific kind of test?
17. Can resources be used to augment support being provided by other federal sources, for example, personnel at Operation Expanded Testing (OpET) sites?

### Monthly reporting

18. What are the due dates for the Monthly Testing Reporting?
19. How do I make changes to my school testing data, school district information, or my implementation plan?
20. Do I need to submit school testing data for a month in which there is not any data to report (e.g., the school year has not yet begun, no changes in testing data, etc.)?
21. How are pooled testing results reported?
22. How do we include home-based screening testing results, along with any resulting positives?
23. Can we use the FEMA test kits we have received and include in our data collected and reported monthly for *ELC Reopening Schools*?
24. Are we expected to report results if the student is tested at an external/non-school-related testing event?

### Terms & Conditions

25. We are developing a website to provide guidance and resources to schools regarding testing and mitigation efforts. There are numerous pages, each translated into a different language. Do we have to have an 'acknowledgement of Federal funding' on each page and translated into the language that matches the rest of the page content?
26. If a recipient uses funds to provide financial support to private schools for COVID-19 screening testing, do the private schools have to follow the Federal reporting and other requirements listed in the guidance and/or Notice of Award Terms & Conditions?

### Appendix A: Allowable Testing Populations

### Appendix B: Examples of Allowable Expenses



### Allowable costs

1. Will additional funds be awarded to support the ongoing testing in the 2021-2022 school year?
  - a. At this time, the ELC does not have plans to award additional funds to jurisdictions to support screening testing in the K-12 environment. The Reopening Schools awards were planned to cover the 2021-2022 school year.
2. Can *ELC Reopening Schools* funds cover the cost of testing for individuals covered under the state employee health plan or other health insurance?
  - a. Regarding insurance billing, *ELC Reopening Schools* funding can be used in the following ways:
    - i. Uninsured: Funds can cover costs associated with screening testing for the uninsured.
    - ii. Billing serves as a real or perceived barrier to timely test delivery: Funds can cover costs associated with screening testing when establishing billing services (directly or through a contractual agreement) would delay testing and/or reduce the jurisdiction's ability to rapidly increase testing capacity to meet needs.
    - iii. Payor of last resort when billing insurance: In situations where screening testing is billed to insurance and is either not covered or partially covered by a third-party payor (e.g., private insurance, CMS, etc.), after the claim is rejected or partial reimbursement occurs, the outstanding balance can be covered using *ELC Reopening Schools* funds.
3. Can funds be used to follow-up on positive cases? Do the positive cases need to be identified through a screening testing program?
  - a. *ELC Reopening Schools* funds can be used to support costs associated with initiating appropriate follow-up on positive tests (e.g., confirming case status, identification of contacts, collaboration with public health on case investigations) and conducting mitigation efforts to prevent spread within the school population. There is an expectation that the recipient health department will have case investigation/contact tracing efforts (and associated surveillance systems) already in place that can further support schools when a positive case is identified. Prior ELC awards provide support for these activities and systems.
4. Is whole genome sequencing (WGS) allowable with these resources?
  - a. The ELC has provided recipients resources explicitly aimed at the genomic sequencing of COVID-19 specimens. Should an existing contract already include basic sequencing of positives, and that activity cannot easily be removed from the contract agreement, the resources may be used. The ELC would prefer other ELC COVID funds be utilized for sequencing of specimens.

### Incentives

5. Can incentives be given to schools or may incentives only go to individuals?
  - a. Monetary incentives are only allowable to encourage participation in screening testing. Under this award, gift cards may not exceed a face value of \$25/person. If you have any questions regarding allowability, please contact your ELC Project Officer.
  - b. Monetary reimbursement is also allowable. While not an, 'incentive,' reimbursement of the cost to schools for participation in the program is not only allowable, but also count toward the 85% required to go to districts. Some ELC recipients have hired staff on behalf of districts or reimbursed for necessary items through third-party sites, like ClassWallet. If you have any questions about allowability, please contact your ELC Project Officer.
  - c. Non-monetary incentives may also influence participation in screening testing programs. Some examples the ELC has observed include reducing distancing requirements for districts that successfully achieve a certain percentage of screening testing. Additionally, some jurisdictions are using 'test to stay' or 'test to play' approaches that require some frequency of screening testing to participate in school activities. We encourage everyone to follow CDC guidelines to the greatest extent possible.

### Issues with school recruitment

6. Some of our schools do not see a need to start testing now. Are we required to test a certain proportion of schools, students, teachers or staff? How can we meet the requirements for Activity 3?
  - a. While the goal is to have comprehensive screening testing available, it is not the requirement for every single school or district. There is intentional flexibility in the guidance to allow recipients to use funds to meet their unique circumstances in terms of school screening testing and mitigation efforts. Flexibility should be given whenever possible to ensure schools that wish to quickly bring on screening testing may be accommodated.
7. If we can't meet the requirements or can't get school districts to participate, how would that impact ELC funding?

- a. Screening testing is a required activity under this award. While a comprehensive screening program is ideal, any movement in the direction of the goal is encouraged.

### Support to school districts

8. If we contract with a university to conduct the testing of samples collected at schools, would that be covered under the 85% to school districts or the 15% that health departments can retain for administrative costs?
  - a. The 85% that must go to the school districts can be met through direct support and indirect support (not to be confused with 'indirect costs'). Contracting with the university to support the processing of tests coming from schools would be a form of 'indirect support'; therefore, allowable and also would count against the 85%, not the 15%.
9. Is funding expected to go out individually to school districts? Or can they go out through state-wide contracts, labs, etc.?
  - a. There is flexibility to do what works best for your jurisdiction and a variety of ways to support school districts. Contracts or other indirect support are allowable.
10. Can this funding be used to support positions within the school?
  - a. 15% of the award is reserved for administration, oversight, and support. In addition, staff working in schools to administer testing or collecting/reporting testing data may be supported through the 85% of resources allocated to schools. If you have any questions about including costs in the budget, please reach out to your ELC Project Officer.
11. If a lab is contracted by the state for the testing program (specimen collection, processing, lab testing, reporting), could a sliding scale based on school size (small, medium, large) be established to directly reimburse/compensate schools for their costs associated with screening testing?
  - a. Yes, it is allowable.
12. If a school district wants to do diagnostic testing and not screening testing, can they use *ELC Reopening Schools* funds for testing and other prevention measures?
  - a. The *ELC Reopening Schools* award requires recipients to conduct K-12 screening testing in K-12 settings. Funding should substantially support this required activity across the jurisdiction. How the jurisdiction achieves this focus working across school districts is at the jurisdiction's discretion and may involve variability across districts. If only diagnostic is desired within a school district, other federal funds may be a more appropriate fit to support those testing needs-- including previously awarded ELC funds, or funding from Treasury, Education, or FEMA.
13. If a state wanted to expand NAAT testing capacity by equipping public health labs in a new state network, could these ELC funds be used to hire laboratory directors for these labs, provided the labs performed testing on samples from schools?
  - a. Yes, this falls into the allowable costs category. Recipients would need to make it clear in the budget justification whether the associated costs are part of the 15% of the award that is reserved for administration, oversight, and support; or indirect support that is attributable to the 85% that is mandated to go to school districts.

### Testing logistics and eligible events

14. Can funds be used to test during outbreaks or for symptomatic individuals?
  - a. Yes. In the event that a student or staff member becomes symptomatic while at school, the on-site resources for a school screening testing program could certainly be extended to test that student or faculty member. It should be noted, however, that students or staff who are symptomatic should not go to school and should be directed to seek testing in clinical care sites or at existing testing sites in the community.
15. Are we required to use any specific models (e.g., Operation Expanded Testing) to implement school testing?
  - a. No. The ELC shares tools and models as resources but no individual tool or model is mandatory. You may also use a combination of resources if that best suits your needs. For example, ELC resources may be used to support staffing for sample collection and Operation ET may be used to support the actual testing. It should be noted that some recipients have already set up successful models within their own jurisdictions that are different from other HHS initiatives. If you would like to learn about these models, or share your own successful model, please begin by contacting your ELC Project Officer. The ELC will continue to share optional models and other resources that recipients are welcome to employ, if they so choose.
16. Are we required to utilize any specific kind of test?
  - a. No; however, we encourage that recipients utilize FDA EUA tests whenever possible and to monitor market availability of your preferred testing supplies and reagents. Recipients should have plans in place in the event of a shortage of test reagents or ancillary items such that you are able to continue testing should a shortage occur. If you are working with a vendor, please ensure they also have the ability to accommodate fluctuations in the marketplace.

17. Can resources be used to augment support being provided by other federal sources, for example, personnel at Operation Expanded Testing (OpET) sites?
  - a. While ELC funds may not *duplicate* support provided from other sources, we encourage recipients to utilize all of the resources available to them in order to provide the most complete array of support for their communities. For example, ELC funds may support personnel at schools participating in OpET.

### Monthly reporting

18. What are the due dates for the Monthly Testing Reporting?
  - a. The ELC is using recipient feedback to inform a change in due dates for monthly testing data. Moving forward, beginning in October, testing data is due no later than the 15<sup>th</sup> of each month. Should you need technical assistance, or have template-related concerns, you should submit earlier in the month to receive technical assistance before the due date window closes; templates for the upcoming month will be available on the 15<sup>th</sup> of the preceding month (e.g., templates for November will be available October 15<sup>th</sup>).
19. How do I make changes to my school testing data, school district information, or my implementation plan?
  - a. Please contact your ELC Project Officer before making any changes. They will provide instructions and ensure your data is submitted correctly.
20. Do I need to submit school testing data for a month in which there is not any data to report (e.g., the school year has not yet begun, no changes in testing data, etc.)?
  - a. If you do not have any data to report, please provide this information in the notes section of the REDCap reporting. Both the monthly district data and the testing plans are of great interest to CDC and HHS leadership. Please make every effort to ensure the submissions are on-time and complete.
21. How are pooled testing results reported?
  - a. Both individual and pooled tests should be reported in the 'Tests Conducted: PCR' and/or 'Tests Conducted: Antigen' as appropriate. The reporting of testing is not intended to be for surveillance purposes, instead we are only monitoring existing and increased testing activities.
22. How do we include home-based screening testing results, along with any resulting positives?
  - a. As the number of tests sent home might not reflect positive test results *received* if a district is employing home-based testing (e.g., BinaxNOW), include the total number of kits sent out by the school district in the 'Other' column; include a comment in the 'Notes' column that indicates this is from home-based tests. Any positive test results associated with home-based tests should be entered into the 'Positive Tests' column.
23. Can we use the FEMA test kits we have received and include in our data collected and reported monthly for *ELC Reopening Schools*?
  - a. Reporting should include all school testing done on a population, regardless of the source.
24. Are we expected to report results if the student is tested at an external/non-school-related testing event?
  - a. No, you are not expected to report results from students tested outside of school-based or school-sponsored testing events. Please focus your efforts on collecting results coming from school-based programs, school-sponsored events, etc.

### Terms & Conditions

25. We are developing a website to provide guidance and resources to schools regarding testing and mitigation efforts. There are numerous pages, each translated into a different language. Do we have to have an 'acknowledgement of Federal funding' on each page and translated into the language that matches the rest of the page content?
  - a. If the page in question has content, resources, description of work, or progress reported which is supported (partially or in full) using funds from the *ELC Reopening Schools* award, then the acknowledgement of federal funding must be on the page and translated in the predominate language being used on the page to convey the information.
26. If a recipient uses the funds to provide financial support to private schools for COVID-19 screening testing, do the private schools have to follow the Federal reporting and other requirements listed in the guidance and/or Notice of Award Terms & Conditions?
  - a. As the private schools are sub-recipients of Federal funds (i.e., *ELC Reopening Schools*), they are bound by the same HHS mandates and award terms and conditions that apply to the ELC recipient.

## Appendix A: Allowable Testing Populations, ELC Reopening Schools

<b>Teacher and/or student population in question</b>	<b>Allowable?</b>
City-sponsored programs (e.g., summer YMCA-programs)	Yes, if they are providing educational and/or recreational activities to K–12 youth
Colleges & Universities	Currently not allowable
Daycare centers	Currently not allowable
Non-public schools (e.g., charter, independent, private)	Yes
Pre-K or early care and education programs	Yes, if the students/faculty are co-located with K-12 students/faculty
School-affiliated summer programs (e.g., camps, summer instruction)	Yes
Schools that are already open for in-person instruction	Yes
Schools that are open using a hybrid option	Yes
School-sponsored events (e.g., book fairs, graduations, sporting events)	Yes
Tribal schools	Yes

## Appendix B: Examples of Allowable Expenses, ELC Reopening Schools

Activity or Expenditure	Allowable?
Support for diagnostic testing (e.g., administration, etc.)	Yes
Testing events that may also involve other mitigation activities (e.g., promotion of vaccine)	Yes
Promotion of vaccinations as part of testing/contact tracing activities within schools	Yes, when characterized as a COVID-19 mitigation strategy
Portable high-efficiency particulate air (HEPA) fans	Yes
Air filtration systems / other small items that improve air circulation	Yes
Incentives to participate in screening	Yes, see allowable cost #13 in guidance for requirements and <a href="#">Incentives area</a> in this document
Transporting individuals to get tested	Yes
Developing, improving, or linking schools with testing service providers (e.g., web-based platforms)	Yes
Testing and monitoring isolated individuals	Yes
Wrap-around services for individuals who test positive	Yes
Purchasing/leasing vehicles	Yes, see allowable cost #10 in guidance for requirements
Personal Protective Equipment	Yes, see <a href="#">current CDC guidelines</a> for details
Providing clinical care or medication to individuals who test positive	No
Minor or major construction	No
Vaccine registry enhancements	No