



**ELC REOPENING SCHOOLS:  
SUPPORT FOR SCREENING  
TESTING TO REOPEN & KEEP  
SCHOOLS OPERATING SAFELY**

**UPDATED GUIDANCE: 8/2/2021**

Project E: Emerging Issues

Supported through the American Rescue Plan Act of 2021

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## ELC REOPENING SCHOOLS: SUPPORT FOR SCREENING TESTING TO REOPEN & KEEP SCHOOLS OPERATING SAFELY UPDATED GUIDANCE PROJECT E: EMERGING ISSUES

### EXECUTIVE SUMMARY

Since the publication of the *ELC Reopening Schools Guidance* the pandemic has evolved. While students over 12 years are presently eligible to receive the COVID-19 vaccine, significant numbers of K-12 students still remain unvaccinated or may be ineligible to receive the vaccine due to age. Additionally, because the pandemic has persisted, communities may soon be dealing with seasonal influenza in addition to COVID-19. Because some of the symptoms of flu, COVID-19, and other respiratory illnesses are similar, the difference between them cannot be made based on symptoms alone. Testing remains critically important to identify and appropriately mitigate the spread of respiratory illness throughout communities.

Updates to the previously published *guidance* reflect the current needs of recipients as they implement plans to address COVID-19 during the 2021-2022 school year. The red font throughout this guidance indicates new or updated content. A high-level summary of updates includes:

1. Activities now explicitly include both detection and prevention of COVID-19 in schools, with a continuing focus on screening testing as a mitigation strategy. Recipients are expected to utilize CDC guidance to implement the appropriate strategies for detecting and mitigating the spread of COVID-19 in K-12 schools. Please refer to CDC guidance: [Operational Strategy for K-12 Schools](#).
2. Expansion of allowable costs, in addition to required screening testing activities, to include:
  - a. Support for diagnostic testing
  - b. Testing events that may also involve other mitigation activities (e.g., promotion of vaccine) to limit

- the spread of COVID-19.
- c. The promotion of vaccinations as part of testing/contact tracing activities, and when characterized as a mitigation strategy to prevent widespread COVID-19 within the school and the community.
  - d. Costs related to prevention may also include portable high-efficiency particulate air (HEPA) fan/filtration systems or other small items that may allow for improved air circulation.
3. Required reporting frequency for test volume by school district has been reduced from weekly to monthly. Any weekly data collected after July 5 may be submitted via an attachment in REDCap.
  4. Recipients will be required to submit an updated K-12 plan that details screening testing strategies and other activities to reduce the spread of COVID-19 and maintain safe operations in schools as community transmission and/or vaccination rates change. Whenever possible, the proposed plans should align with [CDC guidance](#). Templates for the plan will be provided or information collected via REDCap.

## BACKGROUND AND PURPOSE

To support safe, in-person instruction in kindergarten through grade 12 (K-12) schools, screening testing provides another important layer of prevention to protect students, teachers, and staff, and slow the spread of SARS-CoV-2, the virus that causes Coronavirus Disease 2019 (COVID-19). While it is critical for schools to remain open for academic, social, emotional benefits, it is equally important to do so safely ([Operational Strategy for K-12 Schools](#)). Since funds were awarded to ELC recipients in April of 2021, made available from the American Rescue Plan Act of 2021, P.L. 117-2, recipients have been working to integrate screening testing in an overall prevention strategy to allow their schools to safely open for in-person instruction in the Fall, and remain open throughout the 2021-2022 school year. The goal is to maximize in-person learning days.

In addition to the \$10 billion provided as a part of this award, approximately \$30 billion had already been awarded to public health departments to support activities, including screening testing, through the *ELC Enhancing Detection (ED)* and *ELC ED Expansion* supplements. Using those supplemental funds, public health departments increased their ability to provide screening testing broadly to their communities, including congregate settings, like schools. The resources available through this award are aimed at providing support for schools to detect and prevent the transmission of COVID-19 within schools. Recipients should ensure equitable access to the support being provided by this opportunity and where appropriate, coordinate with other initiatives that may already be targeting areas with high Social Vulnerability Index (SVI).

## FUNDING STRATEGY & SUPPORT TO SCHOOL DISTRICTS

As the pandemic has evolved and vaccine coverage increased, strategies used to prevent the spread of COVID-19 continue to be important, including tools like screening testing emphasized in the original iteration of the *ELC Reopening Schools* guidance.

The objectives and goals of this funding are primarily focused on providing needed resources to implement screening testing programs Recipients should, whenever possible, align their approach with CDC recommendations for K-12 ([Operational Strategy for K-12 Schools](#)).

As stated in the original guidance, a minimum of 85% of the award total must be allocated to supporting prevention efforts in school districts. This support can include directly providing funds to schools or indirectly by providing support to increase screening testing and support for related prevention strategies in all K-12 schools (public or private) within the recipient's jurisdiction. Recipients may use a combination of approaches (examples follow below) to successfully provide the necessary support to schools.

Up to 15% may be used by direct recipients for coordination, management, technical assistance, monitoring, and data collection and reporting activities to support K-12 screening testing programs and/or provide necessary support for prevention strategies. These funds may not be applied to expenditures incurred before the date of award. However, recipients can use previously awarded funds for any school screening testing activities that are consistent with those awards and in a way that is not a duplication of effort but an enhancement or complementary effort. School screening testing is an allowable activity under the prior two supplemental awards: *ELC Enhancing Detection* and *ELC Enhancing Detection Expansion*.

**Examples of providing funding directly to support school districts, public charter schools, and private schools include, but are not limited to:**

1. Contracting with testing companies to directly implement programs in K-12 schools and school districts.
2. Partnering with local or chain pharmacies to provide screening testing for K-12 schools and school districts (e.g., contract or fee-for-service model).
3. Partnering directly with laboratories with or without established regional footprints.
4. Directly contracting with K-12 schools and school districts within a recipient's jurisdiction for the completion of the activities in this guidance.
5. Establishing an account or a mechanism to allow K-12 schools and school districts to be reimbursed for costs associated with screening testing.
6. Coordinating with the state or jurisdictional Department of Education to facilitate financial support for K-12 schools and school districts.
7. Sub-awarding to Local Health Departments to support school screening testing directly.
8. Supporting IT systems to monitor screening testing in K-12 schools and school districts and ensure positive results are linked to public health action.

*\* Each jurisdiction is different; it is assumed that any proposed approach will align with existing jurisdictional laws, regulations, and business practices, while remaining consistent with this award.*

**Examples of indirectly providing materials and services to school districts, public charter schools, and private schools include, but are not limited to:**

1. Recipient using purchasing authorities to obtain screening testing kits, and necessary supplies, and providing them to school districts, public charter schools, and private schools within their jurisdiction.
2. Providing courier services to improve turn-around time for results.
3. Providing Personal Protection Equipment (PPE) or other items, such as [appropriate air filters](#), directly to the school.
4. Providing laboratory support.
5. Personnel support, onsite, such as a screening testing coordinator, for sample collection, or other additional staff

- needed to implement testing programs, etc.
6. Logistical and operational support, including IT systems and data management, as needed. Financial expenditures will be monitored and assessed with recipients monthly.

Financial expenditures will be monitored and assessed with recipients monthly.

## ALLOWABLE COSTS

The financial resources provided are required, by law, to support school-based screening testing activities intended to support open, in person K-12 school environments during the COVID-19 pandemic. Additionally, these resources may be used to support items or activities aimed at implementation of prevention strategies necessary to curtail the spread of COVID-19. Recipients should review the updated [Operational Strategy for K-12 Schools](#) and consider requesting the following when revising their *ELC Reopening Schools* budgets:

1. Personnel (term, temporary, students, overtime, contract staff, etc.).
2. Laboratory equipment used for COVID-19 testing and necessary maintenance contracts.
3. Collection supplies, test kits, reagents, consumables, and other necessary supplies for existing testing (screening or diagnostic) or onboarding new platforms to support this testing.
4. Personal Protective Equipment Please see the most current CDC guidance for details ([Operational Strategy for K-12 Schools](#)).
5. Hygiene and cleaning supplies.
6. Hardware and software necessary for reporting to public health and communication and coordination of follow up on any positive cases detected.
7. Tools that assist in the rapid identification, electronic reporting, monitoring, analysis, and evaluation of control measures to reduce the spread of COVID-19, that may be translatable to other diseases (e.g., GIS software, visualization dashboards, cloud services).
8. Contracts with academic institutions, private laboratories, other non-commercial healthcare entities, and/or commercial entities that may provide all or part of the screening testing needs. This may include contracts with companies that offer comprehensive support for screening testing in K-12 (e.g., sample collection, screening testing, and reporting).
9. Software or systems to assist with laboratory resource management (e.g., software for inventory management, temperature notifications, etc.), quality management, biosafety, or training needs.
10. Leasing/purchasing vehicles (e.g., mobile screening testing, providing K-12 screening testing services in underserved areas, etc.). Note: Recipients will need to submit quotes with their revised budgets and receive prior approval from the Office of Grant Services (OGS). If need arises before or after the revised Notice of Grant Award (NOA) is issued, requests for leasing/purchasing must be made through GrantSolutions and include the necessary quotes.
11. Portable high-efficiency particulate air (HEPA) fan/filtration systems or other small items that may allow for improved air circulation
12. Public health events that include students and other community members and are aimed at providing opportunities for increased detection and prevention of COVID-19. *Please note that promotion of vaccination may be considered a prevention strategy for preventing further spread of COVID-19; however, recipients are asked to coordinate these activities between ELC and Immunization staff within the jurisdiction. Additionally, coordination with ELC Project Officer and Immunization Project Officer is crucial to ensure there is not duplication between the two sources of financial support.*
13. Program incentives may be considered to encourage individuals to participate in screening testing. Recipients interested in exploring this option must submit a plan that covers all of the following elements: (a) justification, (b) cost savings [e.g., how it will defray costs or have a positive return on investment], (c) defined amount (not to exceed \$25 per instance), (d) qualifications for issuance, and (e) method of tracking. When submitting the revised budget within 60 days of award issuance, the program incentive plan must be included in the 'budget justification' section of the ELC budget workbook and receive CDC approval before implementation. After the revised NOA is issued, any subsequent requests for using

funds to support program incentives must be made in GrantSolutions, including the program incentive plan, and must receive CDC approval before implementation.

14. Wrap-around (e.g., hoteling, food, laundry, mental health services, etc.) services for those who test positive.
15. Expenses associated with outreach and assistance (e.g., support provided through community-based organizations).
16. Costs associated with transporting individuals to get tested.
17. Expenses associated with technical assistance to establish school-based screening testing programs (NGOs, academic institutions, foundations, etc.).
18. ELC Reopening Schools funds can be used to cover screening and diagnostic testing costs (e.g., administration, etc.) fully. Recipients should follow all appropriate federal laws and regulations pertaining to testing reimbursements, including assuring that charges are not covered both by ELC funds and other reimbursement sources.
19. Testing events that may also involve other mitigation activities (e.g., promotion of vaccination) to limit the spread of COVID-19.
20. The promotion vaccinations when characterized as a mitigation strategy to prevent widespread COVID-19 within the school and the community.
21. Costs related to prevention may also include portable high-efficiency particulate air (HEPA) fan/filtration systems or other small items that may allow for improved air circulation.

The above list covers the anticipated, most relevant costs associated with achieving the activities in this guidance. This list does not represent a full list of allowable costs. Recipients are referred to the cost principles regulation found at [45 CFR Part 75 Subpart E – Cost Principles](#).

In determining if costs are allowable, consideration must be given to applicable regulations; the overall underlying cooperative agreement (CK19-1904); be considered necessary and reasonable; and be considered allocable (see: [45 CFR 75.403](#)). Any questions about specific budget items should be directed to the OGS and the ELC Project Officer.

Please also note, the CDC is not prescribing the specific tests that may be used for implementing screening testing; however, recipients are encouraged to adhere to CDC and FDA guidance when selecting a test type and determining the approach to testing.

## COVID-19 TERMS AND CONDITIONS

**Coronavirus Disease 2019 (COVID-19) Funds:** A recipient of a grant or cooperative agreement awarded by the Department of Health and Human Services (HHS) with funds made available under the Coronavirus Preparedness and Response Supplemental Appropriations Act, 2020 (P.L. 116-123); the Coronavirus Aid, Relief, and Economic Security Act, 2020 (the “CARES Act”) (P.L. 116-136); the Paycheck Protection Program and Health Care Enhancement Act (P.L. 116-139); the Consolidated Appropriations Act and the Coronavirus Response and Relief Supplement Appropriations Act, 2021 (P.L. 116-260) and/or the American Rescue Plan of 2021 [P.L. 117-2] agrees, as applicable to the award, to: 1) comply with existing and/or future directives and guidance from the Secretary regarding control of the spread of COVID-19; 2) in consultation and coordination with HHS, provide, commensurate with the condition of the individual, COVID-19 patient care regardless of the individual’s home jurisdiction and/or appropriate public health measures (e.g., social distancing, home isolation); and 3) assist the United States Government in the implementation and enforcement of federal orders related to quarantine and isolation.

In addition, to the extent applicable, Recipient will comply with Section 18115 of the CARES Act, with respect to the reporting to the HHS Secretary of results of tests intended to detect SARS-CoV-2 or to diagnose a possible case of COVID-19. Such reporting shall be in accordance with guidance and direction from HHS and/or CDC. HHS laboratory

reporting guidance is posted at: <https://www.hhs.gov/sites/default/files/covid-19-laboratory-data-reporting-guidance.pdf>.

Further, consistent with the full scope of applicable grant regulations (45 C.F.R. 75.322), the purpose of this award, and the underlying funding, the recipient is expected to provide to CDC copies of and/or access to COVID-19 data collected with these funds, including but not limited to data related to COVID-19 testing. CDC will specify in further guidance and directives what is encompassed by this requirement.

This award is contingent upon agreement by the recipient to comply with existing and future guidance from the HHS Secretary regarding control of the spread of COVID-19. In addition, in accordance with HHS' regulatory requirements for pass-through entities at 45 CFR 75.352, recipient is expected to flow down these terms to any subaward, to the extent applicable to activities set out in such subaward.

To achieve the public health objectives of ensuring the health, safety, and welfare of all Americans, Recipient must distribute or administer testing without discriminating on non-public-health grounds within a prioritized group.

**Acknowledgement of Federal Funding:** When issuing statements, press releases, publications, requests for proposal, bid solicitations and other documents --such as tool-kits, resource guides, websites, and presentations (hereafter "statements")--describing the projects or programs funded in whole or in part with U.S. Department of Health and Human Services (HHS) federal funds, the recipient must clearly state:

1. The percentage and dollar amount of the total costs of the program or project funded with federal money; and,
2. The percentage and dollar amount of the total costs of the project or program funded by non-governmental sources.

When issuing statements resulting from activities supported by HHS financial assistance, the recipient entity must include an acknowledgement of federal assistance using one of the following or a similar statement.

**If the HHS Grant or Cooperative Agreement is NOT funded with other non-governmental sources:**

This [project/publication/program/website, etc.] [is/was] supported by the [full name of the OPDIV/STAFFDIV] of the U.S. Department of Health and Human Services (HHS) as part of a financial assistance award totaling \$XX with 100 percent funded by [OPDIV/STAFFDIV]/HHS. The contents are those of the author(s) and do not necessarily represent the official views of, nor an endorsement, by [OPDIV/STAFFDIV]/HHS, or the U.S. Government. For more information, please visit [OPDIV/STAFFDIV website, if available].

**The HHS Grant or Cooperative Agreement IS partially funded with other nongovernmental sources:**

This [project/publication/program/website, etc.] [is/was] supported by the [full name of the OPDIV/STAFFDIV] of the U.S. Department of Health and Human Services (HHS) as part of a financial assistance award totaling \$XX with XX percentage funded by [OPDIV/STAFFDIV]/HHS and \$XX amount and XX percentage funded by non-government source(s). The contents are those of the author(s) and do not necessarily represent the official views of, nor an endorsement, by [OPDIV/STAFFDIV]/HHS, or the U.S. Government. For more information, please visit [OPDIV/STAFFDIV website, if available].

The federal award total must reflect total costs (direct and indirect) for all authorized funds (including supplements and carryover) for the total competitive segment up to the time of the public statement.

Any amendments by the recipient to the acknowledgement statement must be coordinated with the HHS Awarding Agency.

If the recipient plans to issue a press release concerning the outcome of activities supported by HHS financial assistance, it should notify the HHS Awarding Agency in advance to allow for coordination.

### **Termination**

This award may be terminated in whole or in part consistent with 45 CFR 75.372.

CDC may impose other enforcement actions in accordance with 45 CFR 75.371- Remedies for Noncompliance, as appropriate.

## **SUPPORTING MANAGEMENT OF ACTIVITIES AND RESOURCES**

There are special reporting requirements (see ‘Summary of Reporting Requirements’ in the ‘Performance Measures and Reporting’ section) which will likely require dedicated personnel resources to ensure timeliness and completeness of data being reported. Please note that these requirements have been updated.

Examples of support in the form of coordination, management, technical assistance, monitoring and reporting, include but are not limited to:

1. Contracting for the development of a web-based platform, linking school districts, public charter schools, and private schools with testing service providers, with a program overview, toolkit and resources, and communication materials (e.g., [COVID-19 Educational Testing](#)).
2. Adapting, modifying or implementing testing program toolkits or playbooks to support school districts, public charter schools, and private schools in program design (e.g., [The Rockefeller Foundation Playbook for Educators and Leaders](#)).

## **PROCESS FOR WORKPLAN AND BUDGET SUBMISSION**

At the time of guidance update, recipients should have provided resources to districts and/or determined the method(s) with which support to school districts will be conducted. Please see the ‘Activities’ section of this guidance for details pertaining to the updated required activities under this award. A K-12 plan for implementing screening testing and other measures is required and should be submitted via REDCap (due within 30 calendar days of release of this guidance via GrantSolutions).

This funding was awarded in the ELC Budget Period 2 (BP2) (i.e., August 1, 2020 – July 31, 2021) under CK19-1904. However, recipients should note that this supplemental funding is for a 16-month project period and will end on July 31, 2022. The expanded project period coincides with the end of Budget Period 3 (BP3) (i.e., August 1, 2021 – July 31, 2022) of the ELC Cooperative

Agreement (CK19-1904). Recipients are reminded that expanded authority<sup>1</sup> applies, in terms of carryover of unobligated from one budget period to the next budget period to cover the approved workplan activities.

## REQUIRED TASKS

**Note:** If a recipient does not meet the below required tasks and has not received written approval for an extension from CDC, recipient may have their funds restricted in the Payment Management System (PMS) for specific costs/activities.

Recurring or repeat non-compliance may result in additional restrictions or other actions being taken, consistent with applicable grant regulations.

In addition to the programmatic activities noted below in further detail, recipient responsibilities include but are not limited to the following:

1. Regular participation in calls with CDC/HHS for technical assistance and monitoring of activities supported through this cooperative agreement. *Please note, at the time of guidance update, at least one call with CDC should have taken place.*
2. On-time submission of all requisite reporting. This may include but is not limited to reporting of performance measures, progress on milestones, and/or financial updates within REDCap.
3. Report expenditures and unliquidated obligations (ULO) on a monthly basis. On the 5<sup>th</sup> day of the month, the expenditures and ULOs from the prior month shall be reported in the REDCap 'ELC Reopening Schools: COVID Award' portal under the 'ELC Reopening Schools Financial Reporting' page.
4. Documentation of any necessary budget change/reallocation through GrantSolutions and REDCap.
5. **Updated reporting:**

In accordance with previous guidance, recipients should have already been reporting the following items on a weekly basis through July 7 via REDCap:

- a. The number of tests conducted by school district;
- b. Test type; and
- c. Cases identified.

Testing reporting changes are effective immediately upon publication:

- a. Weekly reporting of test volume data from K-12 schools will be moved to a monthly reporting schedule
- b. Recipients are required to submit an updated K-12 plan that details strategies used to reduce the spread of COVID-19 and maintain safe operations in schools as community transmission and/or vaccination rates change. All plans must describe the role of screening testing in as it pertains to the changing conditions of the pandemic. Wherever possible, recipients should follow the CDC guidance for K-12 schools ([Operational Strategy for K-12 Schools](#)). A template will be provided, and the plans should be submitted to REDCap per instruction. Plans will be due within 30 days of publication in GrantSolutions unless otherwise communicated.

*The ELC may be add performance reporting on other mitigation/prevention activities, TBD.*

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<sup>1</sup> Expanded Authority is provided to recipients through 45 CFR Part 75.308, which allows carryover of unobligated balances from one budget period to a subsequent budget period. Unobligated funds may be used for purposes within the scope of the project as originally approved. Recipients will report use, or intended use, of unobligated funds in Section 12 "Remarks" of the annual Federal Financial Report.

## ACTIVITIES

This award has three (3) required overarching activities that are designed to meet the immediate needs to safely reopen schools and the ongoing efforts to keep schools operating safely.

### **Activity 1: Rapid deployment of screening testing resources** *(At the time of this guidance update, this activity is complete)*

The focus for Activity 1 is to jumpstart the ability for jurisdictions to implement school testing (estimated timeframe April to June). A minimum of 85% (direct and indirect) of the award must be allocated to support schools (public or private) that cover all or some K-12 grades within the recipient's jurisdiction. Recipients may use a combination of mechanisms to successfully provide the necessary support to schools. While not exhaustive, examples of mechanisms to provide financial support are listed in the 'Funding Strategy' section above. Additionally, examples of types of support may be found under the 'Allowable Costs' section. Recipients will need to support school district implementation with technical assistance and monitoring, as well as identifying public health actions needed based on school screening testing information. Recipients should assure that school districts, public charter schools, and private schools have adequate plans for action when they identify a positive test result.

Recipients may also plan and implement support for screening programs in school-affiliated summer programs, including camps and summer instruction. Recipients can also consider summer programs outside of schools that focus on providing equitable access to educational and recreational activities.

### **Updated Activity 2: Development and submission of K-12 screening testing implementation plan**

*Please note that support for prevention strategies that extend beyond screening testing have been added as allowable (optional) costs.*

Recipients are required to submit an updated K-12 plan that details screening testing strategies and other activities used to reduce the spread of COVID-19 and maintain safe operations in schools as community transmission and/or vaccination rates change. All plans are required to include screening testing in the approach. Wherever possible, recipients should follow the CDC guidance for K-12 schools ([Operational Strategy for K-12 Schools](#)). A template will be provided, and the plans should be submitted to REDCap per instruction. Unless otherwise communicated, plans will be due within 30 days of the revised guidance being uploaded into GrantSolutions.

### **Activity 3: Implementation screening testing action plan**

Using the screening testing plan as a guide, recipients will progress through the stepwise implementation of the plans to support schools safely opening/remaining open for the 2021-2022 school year. The implementation plan should include methods to monitor effectiveness and integrate modifications as needed based on lessons learned over time.

*Please note that additional supplemental guidance may be released to recipients based on information collected from performance measures, milestone progress reporting, and/or additional scientific understanding of SARS-CoV-2.*

## PERFORMANCE MEASURES

Should additional performance measures be requested beyond the reporting requirements noted below, the ELC will work with recipients to maximize the impact of the measures being collected. Whenever possible the ELC utilizes existing data sources.

## SUMMARY OF REPORTING REQUIREMENTS

The following is an updated summary of reporting requirements for the *ELC Reopening Schools* award, **effective upon publication**.

1. For those conducting screening over the summer, weekly test data collected after July 5, may be submitted via an attachment in REDCap.
2. Within 30 days of the revised guidance being uploaded into GrantSolutions , recipients should submit an updated K-12 plan for screening testing and the prevention strategies that will be utilized to prevent the spread of COVID-19 in the 2021-2022 school year. A template for this summary will be made available in REDCap.
3. Monthly reporting of test volume data from K-12 schools.
4. Monthly fiscal reports, entered in REDCap with final report in GrantSolutions via Grant Note, beginning 30 days after NOAs are issued. On the 5<sup>th</sup> day of the month, the expenditures and ULOs from the prior month shall be reported in the REDCap 'ELC Reopening Schools: COVID Award' portal under the 'ELC Reopening Schools Financial Reporting' page.
5. Performance measure data.
6. CDC may require recipients to develop annual progress reports (APRs). CDC will provide APR guidance and optional templates should they be required.

*The ELC will be adding performance reporting on other mitigation/prevention activities, TBD.*