

FREQUENTLY ASKED QUESTIONS



On the use of ESSER II and ESSER III Funds for Construction

The U.S. Department of Education issued updated guidance on December 7, 2022, regarding the use of ESSER funds which included guidance on utilizing these funds for construction.

Many states are reporting that a large majority of these federal funds have not yet been allocated or spent by K-12 education agencies. Now is the time to leverage this funding to address backlogged maintenance issues related to HVAC assets as well as roofing and building envelope components.

Find updated guidance on how funding under the Elementary and Secondary School Emergency Relief (ESSER) Fund, including the American Rescue Plan ESSER (ARP ESSER) program, and the Governor's Emergency Education Relief (GEER) Fund may be used in response to the impact of the coronavirus disease 2019 (COVID-19) pandemic on students in pre-K-12 education.

PLEASE VISIT:

<https://oese.ed.gov/files/2022/12/ESSER-and-GEER-Use-of-Funds-FAQs-December-7-2022-Update.pdf>

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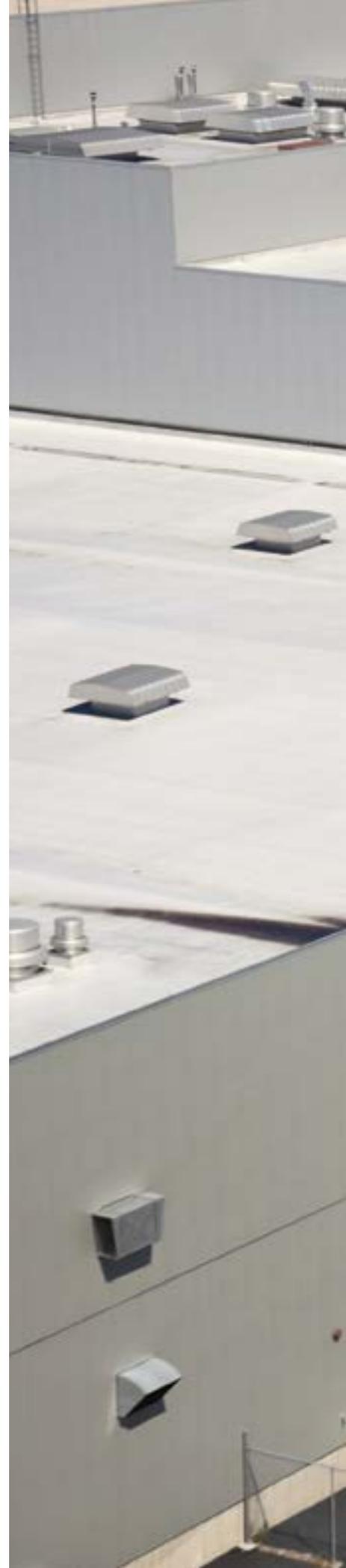
Below is a summary of the updated guidance on how schools may use ESSER funding as it relates to roofing, building envelope, and construction projects.



What type of facility improvements/upgrades can be done using ESSER funds?

In accordance with the [original guidance](#) and the [updated guidance](#), ESSER II and ESSER III funds can be used for:

- // School facility repairs and improvements to enable the operation of schools to reduce the risk of virus transmission and exposure to environmental health hazards, and to support student health needs.
- // Inspection, testing, maintenance, repair, replacement, and upgrade projects to improve the indoor air quality in school facilities, including mechanical and non-mechanical heating, ventilation, and air conditioning systems, filtering, purification, and other air cleaning, fans, control systems, and window and door repair and replacement.
- // Developing strategies and implementing public health protocols including, to the greatest extent practicable, policies in line with guidance from the CDC for the reopening and operation of school facilities to effectively maintain the health and safety of students, educators, and other staff.
- // Other activities that are necessary to maintain the operation of and continuity of services in local educational agencies (LEAs) and continuing to employ existing staff.





Can ESSER and GEER funds be used for construction?

Yes. Construction is authorized under Title VII of the ESEA (Impact Aid) and therefore is an allowable use of GEER and ESSER funds under sections 18002(c)(3) and 18003(d)(1) of the CARES Act, sections 312(c)(3) and 313(d)(1) of the CRRSA Act, and section 2001(e)(2) of the ARP Act. The broad Impact Aid definition of “construction” includes new construction as well as remodeling, alterations, renovations, and repairs under which many activities related to COVID-19 would likely fall. *However, the Department strongly discourages LEAs from using ESSER or GEER funds for new construction.* The Impact Aid program statute defines “construction” as “(A) the preparation of drawings and specifications for school facilities; (B) erecting, building, acquiring, altering, remodeling, repairing, or extending school facilities; (C) inspecting and supervising the construction of school facilities; and (D) debt service for such activities.”



Do the requirements in the Uniform Guidance apply to ESSER and GEER Funds?

Yes. The requirements in the Uniform Guidance apply to expenditures of ESSER and GEER funds. Below are some important Uniform Guidance requirements to keep in mind. Specifically for construction, projects must comply with applicable Uniform Guidance requirements, as well as the Department’s regulations regarding construction at 34 CFR § 76.600. As is the case with all remodeling or construction contracts using laborers and mechanics financed by Federal education funds, a LEA that uses ESSER or GEER funds for minor remodeling, renovation, repair, or construction contracts over \$2,000 must meet all Davis-Bacon prevailing wage requirements and include language in the contracts that all contractors or subcontractors must pay wages that are not less than those established for the locality of the project (prevailing wage rates).



Is there a deadline to obligate the funds?

Yes. The ESSER II and GEER II deadline is **September 30, 2023**, and the ARP ESSER III deadline is **September 30, 2024**.



What do I need to do to be compliant with Education Department General Administrative Regulations (EDGAR)?

When a purchasing agency seeks to procure goods and services using funds under a federal grant or contract, specific federal laws, regulations, and requirements may apply in addition to those under state law. Per requirements for Federal Awards, 2 CFR 200, referred to as the “Uniform Guidance” or “new EDGAR,” all respondents submitting proposals must complete the EDGAR Certification form. Since ESSER II and ESSER III are federal grants, work must follow federal standards. Take note: cooperative purchasing contracts, such as those held by Tremco Roofing/ Weatherproofing Technologies, Inc. (WTI) are EDGAR compliant. Speak to your local Tremco field advisor to learn more.



What causes poor indoor air quality (IAQ)?

The building envelope separates the interior and exterior of a building. When it doesn't function as intended, excess moisture infiltrates and can cause mold problems. Contaminants from outside sources include pollen, fungal spores, dust, industrial pollutants, vehicle exhaust emissions, radon, and pesticides. These can also breach the building envelope to negatively impact IAQ. Common factors contributing to poor IAQ include:

- // Leaky roofs, windows, doors, and roof/wall connections
- // Heating, ventilation, and air conditioning (HVAC) system cleanliness and performance issues
- // Insufficient cleaning or excessive use of cleaning chemicals
- // Other maintenance issues





How does indoor air quality (IAQ) impact student health and academic performance?

As [reported by the EPA](#), studies and field experiences demonstrate that maintenance and repair programs designed to improve the school environment are likely to improve health, reduce absenteeism and enhance academic performance.

- // The presence of dampness and mold increases the risk of asthma and related adverse respiratory health effects in homes by 30-50 percent. The evidence in schools points to similar conclusions.
- // There is evidence that modest changes in room temperature affect students' abilities to perform tasks requiring mental concentration.
- // Children in classrooms with high outdoor air ventilation rates tend to achieve higher scores on standardized tests in math and reading than children in poorly ventilated classrooms.

Research links key environmental factors to health outcomes and students' ability to perform. Improvements in school environmental quality can enhance academic performance, as well as teacher and staff productivity and retention.

Source: <https://www.epa.gov/iaq-schools/frequently-asked-questions-about-improved-academic-performance#factors>



How can a school improve IAQ?

Roofing and building envelope continuity, HVAC disinfection, and moisture management play a crucial role in achieving optimal indoor air quality and ensuring a dry, comfortable, healthy, and safe environment for learning.

- // The first step in improving IAQ is to control moisture to avoid dampness and mold, both of which are linked to respiratory illnesses. You must identify and remediate sources of moisture, which may be leaky roofs, pipes, or damaged foundations. Stopping sources of unwanted moisture will help you to avoid major repairs and replacement costs in the long term.



How can a school improve IAQ? *Continued*

- // A comprehensive air barrier audit can identify where air leaks occur – which allow moisture in.
- // Conduct an evaluation of your HVAC system along with mold assessments and allergen screenings. Test surface samples, and the measuring of temperature, relative humidity, and wall moisture.



How do you keep mold out of buildings?

Mold can grow on a variety of surfaces, such as ceiling tiles, wallpaper, insulation, drywall, carpet, and fabric. People with asthma and other respiratory conditions and those with mold allergies or weakened immune systems should avoid buildings suspected or confirmed to have mold contamination. If dampness or mold is detected, the source of water entry needs to be discovered and then remediated to maintain a safe environment for occupants.

- // Inspect buildings for evidence of water damage and visible mold as part of routine building maintenance, and correct conditions causing mold growth (e.g., water leaks, condensation, infiltration, or flooding) to prevent mold growth. This includes promptly fixing leaky roofs, windows, pipes, and other sources of moisture and dampness.
- // Adequate ventilation and air purification are key prevention strategies for helping to mitigate the spread of airborne infections, such as COVID-19. Improving indoor air quality can reduce the spread of airborne pathogens and help reduce allergens, dust particles, and volatile organic compounds (VOCs) in schools to help create healthier environments for students, educators, and staff.
- // ESSER II and ESSER III funds can be used to optimize ventilation and maintain improvements to indoor air quality to reduce the risk of germs and contaminants spreading through the air.





Why is it important to address other environmental hazards now?

While the focus of the original ESSER funding was on COVID-19-related assistance, in both the original and updated guidance, addressing indoor air quality issues is key to supporting student health needs. That's why federal funds may be used for renovation, including for such projects as making improvements to a school facility to improve indoor air quality. Continuing to utilize funds on COVID-19-related items is critical; however, other environmental hazards must continue to be addressed as they may result in allergic reactions and more serious illness. In an environment where a poor roof and/or building envelope is present, the ventilation effectiveness may be significantly impaired and a variety of IAQ issues may arise. The impacts on environmental conditions (temperature/relative humidity) and ventilation may also adversely affect steps taken to minimize the risk of spreading COVID-19.

While it is crucial that ventilation systems be kept in a clean, hygienic state, an airtight building envelope, including roofs, allows the ventilation system to work more effectively, thus providing better-controlled air movements and environmental conditions. A properly functioning roof and building envelope will help reduce allergens from mold caused by water intrusion from leaks and condensation.

The upkeep of your roofing and building envelope components can help ensure that building occupants are in a safe and healthy classroom environment. Poor IAQ has been tied to symptoms such as headaches, fatigue, trouble concentrating, and other related effects. A building envelope system that allows uncontrolled water into the interstitial space allows for active mold, fungus growth, and poor indoor air quality or sick building syndrome. Faculty, staff, and student exposure to a poor indoor air environment can produce flu-like illness.

**Pertinent information above has been copied from the sources cited.*

If you have questions about prospective roofing, building envelope or HVAC projects using ESSER funding, visit YourRoofExperts.com or call 800.852.6013 to request a complimentary consultation with your local Tremco Roofing Field Advisor.



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tremcoroofing.com/find-a-rep

SOURCES

Updated Guidance:

<https://oese.ed.gov/files/2022/12/ESSER-and-GEER-Use-of-Funds-FAQs-December-7-2022-Update.pdf>

IAQ in Schools:

<https://www.epa.gov/iaq-schools>

ADDITIONAL GUIDANCE CAN BE FOUND HERE:

ARP ESSER:

<https://oese.ed.gov/offices/education-stabilization-fund/elementary-secondary-school-emergency-relief-fund/>

State and Local Education Agency (LEA)/School District Plans:

<https://oese.ed.gov/offices/education-stabilization-fund/elementary-secondary-school-emergency-relief-fund/stateplans/>



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