



STATE OF CONNECTICUT
DEPARTMENT OF EDUCATION



To: Superintendents of Schools
School Business Managers

From: Roger Persson
Chief of Fiscal and Administrative Services

Date: January 19, 2024

Subject: American Rescue Plan (ARP)
Elementary and Secondary School Emergency Relief (ESSER)
Liquidation Extension

As the end of the grant period for the ARP ESSER funds is fast approaching, the Department has received additional guidance from the United States Department of Education (USED) regarding obligation and expenditure timelines. Below please find updated information regarding both topics.

Obligation Deadline:

All ARP ESSER funds **must be** obligated by September 30, 2024. If you had previously committed funds to an allowable activity and they are no longer needed for that purpose, you may obligate them for another allowable purpose prior to September 30, 2024. To do this, you must revise and resubmit your ARP ESSER application in the electronic Grants Management System (eGMS) for approval prior to September 30, 2024. To assist you in your decision making, outlined below is the USED guidance and federal regulations regarding when funds are considered obligated.

Pursuant to USED guidance and federal regulations at 34 C.F.R. § 76.707 funds are considered obligated as follows:

“Specifically, for services or assistance provided through a contract, the obligation is made on the date when the State or the subgrantee makes a binding written commitment to obtain the services, work, or products. For rental or lease of real or personal property, the obligation is made when the property is used.”

If the obligation is for:	The obligation is made:
a) Acquisition of real or personal property	On the date on which the State or the subgrantee makes a binding written commitment to acquire the property.
b) Personal services by an employee of the State or the subgrantee	When the services are performed.
c) Personal services by a contractor who is not an employee of the State or the subgrantee	On the date on which the State or the subgrantee makes a binding written commitment to obtain the services.

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If the obligation is for:	The obligation is made:
d) Performance of work other than personal services	On the date on which the State or the subgrantee makes a binding written commitment to obtain the work.
e) Public utility services	When the State or subgrantee receives the services.
f) Travel	When the travel is taken.
g) Rental of real or personal property	When the State or subgrantee uses the property.
h) A pre-agreement cost that was properly approved by the Secretary under the cost principles in 2 CFR part 200, Subpart E – Cost Principles	On the first day of the grant or subgrant performance period.

Expenditure/Liquidation Deadline & Request for Extension:

Pursuant to federal regulations 2 CFR § 200.344(b), grantees and subrecipients must liquidate ARP ESSER funds within 120 calendar days after the close of the obligation period. This means all funds must be liquidated by January 28, 2025. USED has the authority to approve liquidation extension requests for up to 18 months beyond the end of the obligation period to liquidate funds or 14 months beyond the automatic 120-day liquidation period. This means funds could continue to be liquidated until March 31, 2026.

A state may request in writing an extension of the liquidation period on behalf of itself and its sub-recipients. USED has created a process and a template for states requesting an extension of the liquidation period. My office will schedule an information and training session for Business Managers by late September. A reminder and an invitation will be forthcoming. Follow-up sessions will be scheduled as needed.

Please note that unlike the ESSER II extension request, we will conduct just a single extension request collection. This will consist of an opt-in/opt-out form as well as a spreadsheet to be completed for those districts opting in, to be sent out after the training sessions are held.

If you have any questions, please don't hesitate to call 860-713-6667 or email roger.persson@ct.gov.

Thank you.

RP:cw