Ohio | Department of Education

Governor's Emergency Education Relief (GEER) Fund
Non-Title I Awarded Educational Entities (NT1AEE)
Frequently Asked Questions
Office of Federal Programs
November 25th, 2020

A portion of Ohio's GEER program is used to support grants to schools and districts that did not receive funding through the subsidy portion of the Elementary and Secondary School Education Relief Fund (ESSERF). These funds are provided to specific Non-Title I Awarded Educational Entities (NT1AEE) including Educational Service Centers (ESCs), County Boards of Developmental Disabilities (CBDD) serving school age children, the Ohio School for the Deaf and the Ohio School for the Blind, and Joint Vocational School Districts (JVSDs).

This Frequently Asked Questions document is intended to provide additional guidance to NT1AEEs regarding their GEER award. This document will be updated as needed.

With the closures last year, we were unable to fulfill some services on our service contracts and districts were unwilling to pay out the contracts through the end of the school year resulting in a loss of earnings as we maintained those staff. Would lost revenue be reimbursable under the GEER funding?

The CARES Act/GEER funds are intended to cover costs associated with maintaining operations due to the pandemic including staff. The grant has a Substantially Approved Date of March 13th, 2020. Therefore, funds would not be for lost revenue, but rather used to maintain staff during the pandemic. Please budget appropriately on the GEER Budget grid, and select activities from the GEER Application PDF that match this use of funds.

Can GEER funds be used to recover costs to pay for personnel whose duties were diverted to other initiatives to support our district's pandemic related issues with proper Time and Effort Logs?

Yes, this is an allowable expense. You will want to include these costs on the appropriate function and object codes on the GEER Budget grid. You will also want to select allowable activities on the GEER Application PDF that match this use of funds. For instance, you could select "L. Other activities necessary to maintain the operations and continuity of services in the educational organization and continuing to employ existing staff of the educational organization."

Can GEER funds be used to address expenses related to enhanced/expanded FLMA leave, unemployment costs and refunds (specifically preschool tuition)?

The purpose of GEER is to maintain employees and cover costs related to COVID. The Department recommends you use the funds for retaining staff rather than paying for unemployment for laying off staff. However, Activity Box L on the GEER Application does allow for activities that ensure continuity of services. It appears this use of funds could fall within Allowable Activity L.

Can GEER funds be used to upgrade HVAC or install filtration systems?

This use of funds may be allowable if the organization has obtained approval from the Ohio Department of Education. Approval can be obtained by making a History Log note in the CCIP GEER History Log describing the proposed use, and receiving a return History Log note granting approval. The Code of Federal Regulations state that capital expenditures for general purpose equipment, buildings, and land are unallowable as direct charges, except with the prior written approval of the Ohio Department of Education. Capital expenditures for

special purpose equipment are allowable as direct costs, provided that items with a unit cost of $5,000 or more have the prior written approval of the Ohio Department of Education. Capital expenditures for improvements to land, buildings, or equipment which materially increase their value or useful life are unallowable as a direct cost except with the prior written approval of the Ohio Department of Education.

We recently started a virtual academy. In response to the overwhelming enrollment the program experienced as a result of the pandemic, we hired a new full time supervisor to manage the program and three student mentors to serve these students. Is this something we could charge to GEER?

This appears to be an allowable GEER use of funds, with the caveat that expenditures must be attributed to operational costs associated with the pandemic. Remember to document how these funds were used to meet the intent and purpose of GEER. In addition, be sure to complete the GEER Budget grid and GEER Application PDF appropriately.

Can we apply all or any portion of supervisor costs to these GEER funds? Keeping in mind that while we did in fact have this as a previous position, this position is now full-time to manage the large increase in enrollment due to COVID.

This appears to be an allowable GEER use, with the caveat that expenditures must be attributed to operational costs associated with the pandemic. Remember to document how these funds were used to meet the intent and purpose of GEER. In addition, be sure to complete the GEER Budget grid and GEER Application PDF appropriately.

Can use these GEER funds to cover all workbook and program fees with Edgenuity as well as the student mentor serving the K-5 grade band? The K-5 band was not part of our original plan.

This appears to be an allowable GEER use, with the caveat that expenditures must be attributed to operational costs associated with the pandemic. Remember to document how these funds were used to meet the intent and purpose of GEER. In addition, be sure to complete the GEER Budget grid and GEER Application PDF appropriately.

Is it your understanding ESCs (or educational service agencies) are not typically responsible for equitable services in traditional grant programs because they don't have school attendance areas relevant to Title I and don't have a fixed "jurisdiction" relevant for other federal programs?

ESEA Section 1117 (nonpublic equitable service requirements) are required on LEAs receiving CARES Act funds including ESSER and GEER. The USED Guidance issued on October 9, 2020 clarified that LEAs are required to provide these services, but Institutions of Higher Education and other educational organizations receiving GEER funds are not required to provide these services. Therefore, we are asking that ESCs certify they are not LEAs for purposes of GEER funds.

My grant is at "Consultant Approved", but I can't do a PCR until it is in "Final Approved" status. When will these grants be Final Approved?

The Office of Federal Programs is approving applications as quickly as possible. We have three times as many applications as we did last year due to multiple CARES Act grants and the Consolidated funding applications. We ask for patience and remind you that you may reimburse your costs back to March 13, 2020 once the application is final approved and you have access to the funds. The funds also have a date of September 30, 2022 to be expended.

Is there a requirement to complete a needs assessment to receive GEER funds?

The organization is not required to complete a separate needs assessment in order to receive GEER funds. It is important, however, to assess the organization's needs and utilize GEER funds in a way that meets the assurances of the grant. The assurances can be found at the top of the GEER PDF Application, which gets uploaded to the CCIP GEER Upload Documents page.

Please direct any questions to your Office of Federal Programs consultant or **federalprograms@education.ohio.gov**.