

Tab 3

Governor Emergency Education Relief Fund Update

Coordinating Board for Higher Education

July 21, 2020

BACKGROUND

Missouri received \$54.6 million through the Governor Emergency Education Relief (GEER) Fund upon completion and approval of a certification and agreement with the U.S. Department of Education (USDE). The certification and agreement with USDE includes a description on how the state will use GEER Funds and requires the state to submit an initial report that details how the state will award funds to local education agencies (LEAs), IHEs, or other education-related entities within 45 days of receiving the funds. As part of the reporting requirements and assurances outlined in the Coronavirus Aid, Relief, and Economic Security (CARES) Act and USDE's certification and agreement, the state must also submit the criteria it used to determine those entities that are "most significantly impacted by the coronavirus" or are "essential for carrying out emergency educational services."

The GEER Fund is also subject to a maintenance of effort requirement which stipulates that as a condition of receiving GEER Funds "a State must maintain support for elementary and secondary education and State support for higher education (which must include State funding to IHEs and State need-based financial aid, and may not include support for capital projects or for research and development or tuition and fees paid by students) in fiscal years 2020 and 2021 at least at the levels of such support that is the average of such State's support for elementary and secondary education and for higher education in the three fiscal years preceding March 27, 2020." The CARES Act provides the USDE Secretary the flexibility to waive the maintenance of effort requirement for "the purpose of relieving fiscal burdens on States that have experienced a precipitous decline in financial resources." The CARES Act, nor the USDE, provides a definition for "a precipitous decline."

The GEER Fund can be used to:

- Provide emergency support through grants to the LEAs that the SEA deems to have been most significantly impacted by COVID-19 to support the ability of such LEAs to continue to provide educational services to public and non-public school students and to support the on-going functionality of the LEA;
- Provide emergency support through grants to IHEs serving students within the State that the Governor determines have been most significantly impacted by COVID-19 to support the ability of such institutions to continue to provide educational services and support the ongoing functionality of the institution; and
- Provide support to any other IHE, LEA, or education-related entity within the State that the Governor deems essential for carrying out emergency educational services to students for authorized activities

CURRENT STATUS

Funding. On Thursday, July 9, Governor Parson announced \$113.6 million in CARES Act funds for public institutions of higher education, \$23.6 million provided through the GEER Fund. Allocation amounts under the GEER Fund is based on a model which takes several factors into consideration, including each institution's share of statewide enrollment, Pell enrollment, and faculty/staff, as well as FY 2020 expenditure restrictions. The inclusion of FY 2020 expenditure restrictions and the weighting for faculty/staff reflects the Governor's interest in using these funds to reduce layoffs. DHEWD has established an agreement and reimbursement process by which institutions can access their portion of the GEER Funds. Institutions can draw down these funds by requesting reimbursement for eligible GEER Fund expenses. At the discretion of the institution, a percentage of each institution's funds will go to support remote learning, which aligns with the original GEER fund application submitted to the USDE by the State of Missouri. Unlike the CRF, these funds do not expire on December 30, 2020.

While the department encourages all institutions to use their GEER allocation as soon as possible, according to USDE's May 2020 GEER FAQ regarding how long GEER funds are available for obligation by subrecipients, an "LEA, IHE, or education-related entity receiving a subgrant from the Governor must obligate the funds by September 30, 2022, which includes the Tydings Period (General Education Provisions Act §421(b)(1)). However, the GEER Fund is an emergency appropriation to address the harm to students and the ongoing functionality of LEAs and IHEs caused by COVID-19. As a result, the Secretary strongly urges LEAs, IHEs and education-related entities to deploy GEER funds quickly."

Recognizing the expedience by which the Secretary and the Governor's Office wants the GEER Funds to be obligated, DHEWD recommends institutions draw down its allocation under GEER by June 15, 2020 so this fund is closed out with the conclusion of the state fiscal year.

Reporting. DHEWD, in collaboration with the Department of Elementary and Secondary Education (DESE), submitted the state's 45 day report to USDE on July 15, 2020. DHEWD will work with public institutions of higher education and DESE to meet the reporting requirements outlined under the GEER Fund and the CARES Act. DHEWD and DESE will also consult Office of Administration on Missouri's baseline Maintenance of Effort data which is required to be submitted to USDE by September 1, 2020.

NEXT STEPS

DHEWD will work with institutions in submitting their agreement to the department and begin receiving and reviewing each institution's requested use of their GEER Fund allotment.

ATTACHMENTS

- A. GEER Fund Allocations to Public IHEs
- B. GEER Fund Agreements and Reimbursement Forms

Tab 3, Attachment A
GEER Fund Allocations to Public IHEs

Total GEER					Allocation of Rest -- After Min Expenditure Restriction Recovery				
	\$23,643,000	Background Data				5%	10%	15%	75%
Institution	Total Enrollment	Number of Undergrads Awarded Pell	Total Faculty/ Staff	FY 20 Expenditure Restrictions	At Least X% of GEER Used to Address	Enrollment	Pell	Faculty & Staff	Total GEER Fund
Crowder College	4,401	1,997	630	\$ 741,164	\$ 37,058	\$ 34,873	\$ 83,202	\$ 217,387	\$ 372,520
East Central College	2,649	1,026	358	\$ 686,669	\$ 34,333	\$ 20,990	\$ 42,747	\$ 123,531	\$ 221,601
Jefferson College	4,196	1,442	467	\$ 1,013,762	\$ 50,688	\$ 33,248	\$ 60,079	\$ 161,143	\$ 305,158
Metropolitan Community College	15,770	5,313	2,905	\$ 4,070,263	\$ 203,513	\$ 124,958	\$ 221,357	\$ 1,002,398	\$ 1,552,227
Mineral Area College	2,640	1,096	385	\$ 720,628	\$ 36,031	\$ 20,919	\$ 45,663	\$ 132,848	\$ 235,461
Moberly Area Community College	4,849	1,725	548	\$ 803,411	\$ 40,171	\$ 38,423	\$ 71,869	\$ 189,093	\$ 339,555
North Central Missouri College	1,746	649	185	\$ 341,640	\$ 17,082	\$ 13,835	\$ 27,040	\$ 63,836	\$ 121,792
Ozarks Technical Community College	11,762	5,417	1,720	\$ 1,846,213	\$ 92,311	\$ 93,200	\$ 225,690	\$ 593,502	\$ 1,004,703
St. Louis Community College	17,294	5,964	2,519	\$ 5,574,457	\$ 278,723	\$ 137,034	\$ 248,480	\$ 869,205	\$ 1,533,442
St. Charles Community College	6,363	1,354	831	\$ 1,173,896	\$ 58,695	\$ 50,419	\$ 56,412	\$ 286,744	\$ 452,271
State Fair Community College	4,288	1,928	468	\$ 798,953	\$ 39,948	\$ 33,977	\$ 80,327	\$ 161,488	\$ 315,740
State Technical College of Missouri	1,724	495	235	\$ 769,080	\$ 38,454	\$ 13,661	\$ 20,623	\$ 81,089	\$ 153,827
Three Rivers College	2,967	1,548	333	\$ 671,001	\$ 33,550	\$ 23,510	\$ 64,495	\$ 114,905	\$ 236,460
Harris-Stowe State University	1,630	1,315	324	\$ 1,316,484	\$ 65,824	\$ 12,916	\$ 54,787	\$ 111,799	\$ 245,327
Lincoln University	2,436	1,235	438	\$ 2,221,761	\$ 111,088	\$ 19,302	\$ 51,454	\$ 151,136	\$ 332,981
Missouri Southern State University	5,604	2,543	740	\$ 3,040,999	\$ 152,050	\$ 44,405	\$ 105,950	\$ 255,344	\$ 557,749
Missouri State University	25,404	6,298	3,208	\$ 11,882,364	\$ 594,118	\$ 201,296	\$ 262,396	\$ 1,106,951	\$ 2,164,761
Missouri Western State University	5,608	1,859	616	\$ 2,803,593	\$ 140,180	\$ 44,437	\$ 77,452	\$ 212,557	\$ 474,625
Northwest Missouri State University	7,104	1,835	773	\$ 3,931,257	\$ 196,563	\$ 56,291	\$ 76,452	\$ 266,731	\$ 596,037
Southeast Missouri State University	10,637	3,069	1,235	\$ 5,782,006	\$ 289,100	\$ 84,285	\$ 127,865	\$ 426,148	\$ 927,399
Truman State University	5,231	1,132	743	\$ 5,242,662	\$ 262,133	\$ 41,449	\$ 47,163	\$ 256,379	\$ 607,125
University of Central Missouri	11,229	2,909	1,387	\$ 6,966,185	\$ 348,309	\$ 88,976	\$ 121,199	\$ 478,597	\$ 1,037,082
University of Missouri (all)	70,478	12,327	17,877	\$ 52,289,895	\$ 2,614,495	\$ 558,454	\$ 513,584	\$ 6,168,627	\$ 9,855,160
TOTAL	226,010	64,476	38,925	\$ 114,688,343					
					\$ 5,734,417	\$ 1,790,858	\$ 2,686,287	\$ 13,431,437	\$ 23,643,000

Tab 3, Attachment B
GEER Grant Packet for Public Institutions of Higher Education

Missouri Higher Education Initiatives

Grant Packet

Governor's Emergency Education Relief Fund (GEER)

Funded by:



In partnership with:

Office of the Governor

Office of Administration

Department of Elementary and Secondary Education

July 2020

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I. Grant Summary and Allowable Expenditures

NOTE – this document contains a summary of allowed and disallowed expenses for the Governor’s Emergency Education Relief (GEER) Fund. This information is based on a review of all federal FAQs and guidance for both funds as of July 8, 2020. This document is subject to change.

The Office of Administration did not prepare this document and has not reviewed it. This document is not legal advice and may be superseded by later guidance or other interpretations of available guidance for GEER funds.

The following lists are not comprehensive. They were created after reviewing the plain text of the statute (section 18002 of the CARES Act), the GEER Fund cover letter to the Governor, and the U.S. Department of Education FAQs on the GEER Fund.

The standard DHEWD and IHEs should apply to whether an expense is allowable is whether such expense will **“support the ability of such institutions to continue to provide educational services and support the ongoing functionality of the institution.”** (See Section 18002 of the CARES Act).

Institutions must use some portion of their GEER allocation to support remote learning.

DHEWD Approved Uses:

- **Any expense that can be justified as having been incurred or will be incurred to continue to provide educational services and support the ongoing functionality of the institution;**
- Staff payroll costs dating back to March 13, 2020, especially because institution state appropriations were significantly cut due to COVID-19. This can include payroll for cleaning staff, maintenance staff, instruction staff, and any other staff other than administrative and executive salaries;
- Any expenses associated with moving courses online;
- Staff professional development/training expenses associated with moving to remote learning;
- Expenses associated with providing students access to internet;
- Expenses associated with providing students computers or other hardware to take courses online;
- The purchase of software or applications to provide instruction and/or hold meetings online;
- Expenses to support wraparound services such as mental health, hunger, homelessness, job loss, and lack of childcare.

DHEWD Disallowed Uses:

- Administrative and executive salaries and benefits;
- Payments to faculty unions or associations;
- Expenses associated with lobbying efforts.

NOTE: the GEER Fund is more flexible for FY 20 costs because CRF cannot be used for expenses that were accounted for in the FY 20 budget. GEER can be used for these.

II. Funding Allocations by Institution

The following funding allocations includes the amount each institution is authorized to request reimbursement for eligible expenses. This model takes several factors into account, including each institution's share of statewide enrollment, Pell enrollment, and faculty/staff, as well as FY 20 expenditure restrictions. Inclusion of FY 20 expenditure restrictions and the weighting for faculty/staff reflects the Governor's Office's interest in using these funds to reduce layoffs.

Institution	GEER Funding
Crowder College	\$ 372,520
East Central College	\$ 221,601
Jefferson College	\$ 305,158
Metropolitan Community College	\$ 1,552,227
Mineral Area College	\$ 235,461
Moberly Area Community College	\$ 339,555
North Central Missouri College	\$ 121,792
Ozarks Technical Community College	\$ 1,004,703
St. Louis Community College	\$ 1,533,442
St. Charles Community College	\$ 452,271
State Fair Community College	\$ 315,740
State Technical College of Missouri	\$ 153,827
Three Rivers College	\$ 236,460
Harris-Stowe State University	\$ 245,327

Lincoln University	\$ 332,981
Missouri Southern State University	\$ 557,749
Missouri State University	\$ 2,164,761
Missouri Western State University	\$ 474,625
Northwest Missouri State University	\$ 596,037
Southeast Missouri State University	\$ 927,399
Truman State University	\$ 607,125
University of Central Missouri	\$ 1,037,082
University of Missouri (all)	\$ 9,855,160
TOTAL	\$ 23,643,000

III. Fiscal Reimbursement Process

When submitting any GEER reimbursement requests, a reimbursement form must be completed for each request with copies of all invoices paid.

You can find the forms at: <https://dhewd.mo.gov/reimbursements>

Steps are below on how to submit your reimbursement request.

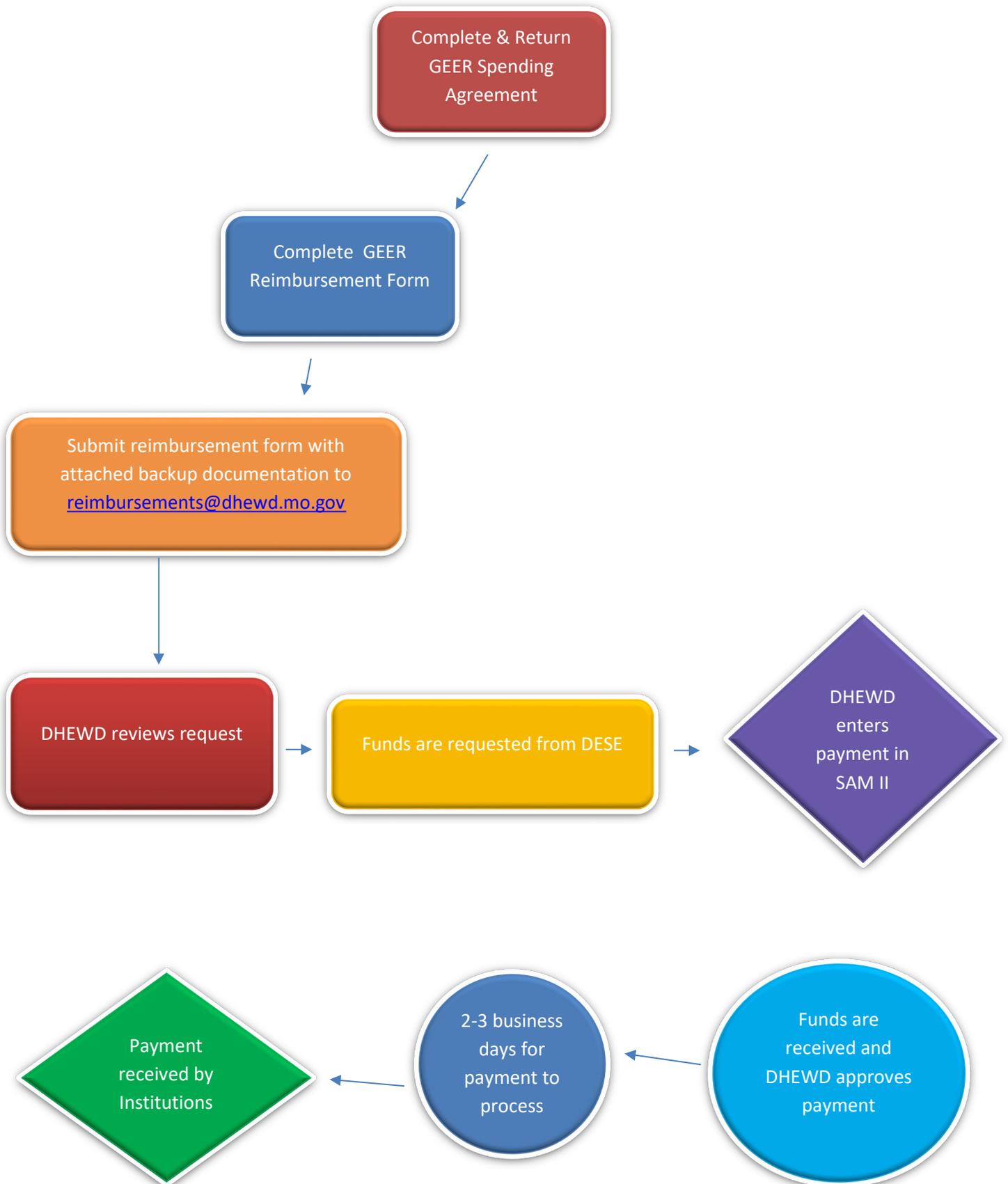
- Complete the correct reimbursement form for GEER funding. Each form is labeled at the top on which initiative it is for.
- Have all backup documentation to support your reimbursement request. The backup documentation must show proof of payment. **Purchase orders or packing slips will not be accepted in lieu of invoices.** Expenses must meet the guidelines in this document along with any new or additional guidance governing these funds released by either the federal government or the State of Missouri.
- Once the form is complete and all backup documentation is available, showing proof of payment, send request and documentation to reimbursements@dhewd.mo.gov. Include your institution name and the words “GEER Funding” in the subject line of the email. Documentation includes the correct reimbursement cover sheet (use multiple copies if needed or add lines if needed) and scanned copies of all invoices along with the cover sheet.

- When the form and documentation is received, they will be reviewed. Once reviewed and documentation is sufficient, the reimbursement request will be processed. DESE is the fiscal agency for this grant and DHEWD will work with them to request the funding as needed. If documentation is missing, we will notify you by email. Your request will not be processed until all proper backup documentation has been received.

Once DHEWD approves the reimbursement request, they will request DESE process a federal grant drawdown to meet cash needs. Then DHEWD will approve the SAM II payment documents created by DHEWD and notify the institution funds should arrive within a few days.

Once payment is submitted into the system, it normally takes approximately two business days before the funds are received.

Processing Reimbursements for GEER



IV. DHEWD Contact Information

All questions can be emailed to reimbursements@DHEWD.mo.gov or call either of the following staff listed below.

Pam Victor, Assistant Director for Budget (573) 751-1883

Nikki Wrinkles, Budget Analyst (573) 522-1364

V. Funding Terms & Conditions

The following terms and conditions also apply to sub recipients. Additional information on the GEER fund can be found at: <https://oese.ed.gov/governors-emergency-education-relief-fund/>

- I. The State must comply with the maintenance of effort provision in Section 18008(a) of Division B of the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) absent waiver by the Secretary pursuant to Section 18008(b) thereof.
- II. The State must submit to the Department, within 45 days of receiving Governor’s Emergency Education Relief (GEER) funds, an initial report detailing the State’s process for awarding those funds to local educational entities (LEAs), institutions of higher education (IHEs), or other education-related entities, including the criteria for determining those entities that are “most significantly impacted by coronavirus” and/or “essential for carrying out emergency educational services” and a description of the process and deliberations involved in formulating those criteria.
- III. The State must return to the Secretary any GEER funds that the State does not award within 1 year of this Grant Award Notification (GAN).
- IV. To the extent that the State charges, or authorizes eligible entities (i.e., LEAs, IHEs, and education-related entities) to charge, pre-award costs to the GEER Fund, the State and eligible entities will only use funds for allowable costs incurred on or after March 13, 2020.
- V. The State must comply with all reporting requirements including those in Section 15011(b)(2) of Division B of the CARES Act, Performance and Financial Monitoring and Reporting in 2 C.F.R. §§ 200.327-329, and submit required quarterly reports to the Secretary, at such time and in such manner and containing such information as the Secretary may reasonably require in the future.
 - a. *REPORTING ON USE OF FUNDS SEC. 15011. (a) In this section— (1) the terms “agency”, “appropriate congressional committees”, “Committee”, “covered funds”, and “Coronavirus response” have the meanings given those terms in section 15010; (2) the term “covered recipient” (A) means any entity that receives large covered funds; and (B) includes any State, the District of Columbia, and any territory or possession of the United States; and (3) the term “large covered funds” means covered funds that amount to more than 150,000... (b)(2) Not later than 10 days after the end of each calendar quarter, each covered recipient shall submit to the agency and the Committee a report that contains— (A) the total amount of large covered funds received from the agency; (B) the amount of large covered funds received that were expended or obligated for each project or activity; (C) a detailed list of all projects or activities for which large covered funds were expended or obligated, including— (i) the name of the project or activity; (ii) a description of the project or activity; and (iii) the estimated number of jobs created or retained*

by the project or activity, where applicable; and (D) detailed information on any level of subcontracts or subgrants awarded by the covered recipient or its subcontractors or subgrantees, to include the data elements required to comply with the Federal Funding Accountability and Transparency Act of 2006 (31 U.S.C. 6101 note) allowing aggregate reporting on awards below \$50,000 or to individuals, as prescribed by the Director of the Office of Management and Budget. (3) Not later than 30 days after the end of each calendar quarter, the Committee, in consultation with the agency that made large covered funds available to any covered recipient shall make the information in reports submitted under paragraph (2) publicly available by posting the information on the website established under section 15010(g). (4)(A) Each agency, in coordination with the Committee and the Director of the Office of Management and Budget shall provide user-friendly means for covered recipients to meet requirements of this subsection. (B) Federal agencies may use existing mechanisms to ensure that information under this subsection is reported accurately. (c)(1) The Director of the Office of Management and Budget, in consultation with the Secretary of the Treasury, the Administrator of the Small Business Administration, and the Chairperson of the Council of Economic Advisors, shall submit to the appropriate congressional committees and publicly release on the website established under section 15010(g) quarterly reports that detail the impact of programs funded through large covered funds on employment, estimated economic growth, and other key economic indicators, including information about impacted industries. (2)(A) The first report submitted under paragraph (1) shall be submitted not later than 45 days after the end of the first full quarter following the date of enactment of this Act. (B) The last report required to be submitted under paragraph (1) shall apply to the quarter in which the Committee terminates.

- VI. For further funding terms and conditions, see the attached Federal Funding Certification detailed below and required to be signed by the institution President before reimbursement is allowed.

Additional terms and conditions may be required and are subject to change by the U.S. Department of Education and the State of Missouri.

VI. Funding Agreement Required

All institutions are required to sign the accompanying Federal Funding Certification (Certification) for GEER Funds before submitting a request for reimbursement using GEER funds. By signing the accompanying Certification, the submitting institution agrees to be bound by all terms and conditions outlined above, all federal guidance and FAQs applicable to the GEER, as outlined above and as amended by the U.S. Department of Education, as well as all terms and conditions contained in the Certification.

Please submit the attached agreement (see page 9) for the receipt of GEER funding and return prior to submitting a reimbursement request to DHEWD. **No reimbursements will be processed until the signed agreement is received by DHEWD.**

***Requests for GEER funding must be received by June 15, 2021 in order to ensure processing by the end of the fiscal year.**

FEDERAL FUNDING CERTIFICATION – Governor’s Emergency Education Relief Fund

Completion of this certification is required before submitting requests for reimbursement for expenses from the State of Missouri’s Governor’s Emergency Education Relief Fund allocation of the CARES Act.

I, [Insert name of signatory], am the President [insert name of institution of higher education], and I certify that:

1. I have the authority on behalf of [insert name of institution of higher education] to request reimbursement from the State of Missouri from the allocation of funds to the State of Missouri from the Governor’s Emergency Education Relief (GEER) Fund as created in the CARES Act.
2. I understand that the State of Missouri will rely on this certification as a material representation in making a reimbursement to [name of institution of higher education].
3. [Insert name of institution of higher education]'s uses of the funds provided as reimbursements will be used only to cover those costs that-
 - a. Will support the institution of higher education’s ability to continue to provide educational services and support the ongoing functionality of the institution.
4. Funds will only be provided as reimbursements from the State of Missouri pursuant to this certification for necessary expenditures that were expended during the period that begins on March 13, 2020. While the federal government allows until September 30, 2022, to utilize funds, [Insert name of institution of higher education] must attempt to draw down all funds by June 15, 2021. Any unused funds remaining by June 15, 2021 may be subject to reallocation by the State of Missouri.
5. Funds provided as reimbursement from the State of Missouri pursuant to this certification must adhere to official federal guidance issued or to be issued on what constitutes a necessary expenditure.
6. [Insert name of institution of higher education] agrees not to request reimbursement for any expenditure that violates federal law.
7. [Insert name of institution of higher education] agrees that if the federal government determines that any reimbursement it received was in violation of the CARES Act or any other federal law, it will return the amount of the reimbursement to the federal government.
8. [Insert name of institution of higher education] agrees that it shall retain documentation of all uses of the funds, including but not limited to invoices and/or sales receipts for a period of five (5) years from the date of receipt of such reimbursement. Such documentation shall be produced to the State of Missouri and/or the any agency of the federal government upon request.
9. Funds received pursuant to this certification cannot be used for expenditures for which an institution of higher education has received any other emergency COVID-19 supplemental funding (whether state, federal or private in nature) for that same expense.
10. [Insert name of institution of higher education] agrees to abide by the Uniform Guidance, available a 2 CFR 200, et seq, to the extent applicable to all requests for reimbursement.

11. [Insert name of institution of higher education] agrees to abide by the regulations governing Cash Management, available a 31 CFR 205 subparts A and B, et seq, to the extent applicable to all requests for reimbursement.
12. [Insert name of institution of higher education] agrees to abide by the Requirements for a Drug-Free Workplace, available a 2 CFR 3186 and 2 CFR 182.
13. [Insert name of institution of higher education] agrees to comply with the following nondiscrimination statutes and their implementing regulations in all matters funded or reimbursed with federal dollars:
 - a. Title VI of the Civil Rights Act of 1964, as amended (42 U.S.C. § 2000 et seq.), which prohibits discrimination on the basis of race, color, or national origin;
 - b. Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. § 701 et seq.), which prohibits discrimination on the basis of disability (note: IMLS applies the regulations in 45 C.F.R part 1170 in determining compliance with § 504 as it applies to recipients of Federal assistance);
 - c. Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§ 1681–83,1685–86), which prohibits discrimination on the basis of sex in education programs; and
 - d. The Age Discrimination in Employment Act of 1975, as amended (42 U.S.C. § 6101 et seq.), which prohibits discrimination on the basis of age
14. [Insert name of signatory], on behalf of the [insert name of higher education institution] certifies to the best of their knowledge and belief that the institution is not delinquent in the repayment of any Federal debt.
15. [Insert name of signatory], on behalf of the [insert name of higher education institution] certifies that the institution will comply with Executive Order 13513 prohibiting text messaging and emailing while driving while conducting official grant business.
16. [Insert name of signatory], on behalf of the [insert name of higher education institution] certifies that the institution will comply with Division B, Title V, Section 505 of Public Law 115-245, Consolidated Appropriations Act, 2019 requiring specific disclosures when making public announcements related to the use of the federal funds.
17. [Insert name of signatory], on behalf of the [insert name of higher education institution] certifies to the best of their knowledge and belief that the institution will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing the CARES Act. As the duly authorized representative of the institution, I hereby certify that the institution will comply with the above certifications.

I certify under the penalties of perjury set forth in Section 575.040, RSMo, that I have read the above certification and my statements contained herein are true and correct to the best of my knowledge. By signing this Certification, the institution agrees to be bound by all terms and conditions outlined in the accompanying GEER IHE Grant Packet, all federal guidance and FAQs applicable to the GEER fund, and all terms and conditions contained herein.

By: _____

Signature: _____

Title: _____

Date: _____

Subscribed and sworn to before me this ____ day of _____, 2020.

Notary Public

My commission expires _____