



CARES Act Governor’s Emergency Education Relief (GEER) Fund

45 Day Report

1. Please describe the State’s process for awarding GEER funds to LEAs, IHEs, and/or other education-related entities, including:

a. Timeline(s) for awarding GEER funds to LEAs, IHEs, and/or other education-related entities;

LEAs: The Minnesota Department of Education released award information and application materials to LEAs on June 8, 2020. LEAs will begin submitting applications on June 30, 2020. Applications will be reviewed on a rolling basis and either approved or returned for resubmission within ten business days from submission.

IHEs: The Minnesota Office of Higher Education is awarding funds to Institutes of Higher Education through direct allocation and a competitive grant process. Tribal institutions will receive direct allocations. The Office anticipates executing contracts for direct allocations by June 30, 2020 with funds distributed immediately following contract execution. For fund distributed via competitive grant process. The Office of Higher Education will be issuing a Request for Proposals the week of June 22 with grant proposals due approximately July 16. Upon review, the Office of Higher Education will notify funded requesters in August 2020 with funds distribution beginning September 1, 2020.

Other Education-related Entities: We expect to award grants to other educational entities in summer 2020. A portion will go to the Minnesota Initiative Foundations to distribute funding for wrap around early education services to educational entities impacted by Covid-19 portion in rural areas. This will likely happen in July 2020. Another portion of the funding reserved for early education providers will be distributed via a competitive grant opportunity to metro area providers. Awards will be made in August 2020.

b. The criteria, process and deliberations you use to determine which LEAs, IHEs, and/or other education-related agencies are:

i. “Most significantly impacted by coronavirus;” and/or

LEAs: Through a daily needs survey, related follow-up communication and information sharing, and a final survey to all superintendents that indicated their unmet technology needs, the LEAs most significantly impacted in their work to provide all students with distance learning were identified and the associated student device and internet connectivity needs documented. The balance of the funds were allocated based on the number of historically underserved students that each LEA served.

IHEs: While many of Minnesota’s postsecondary institutions have conducted informal assessments with students regarding barriers to remote learning, these assessments served to identify immediate resource needs. For both direct allocations and competitive grant funds, OHE will ask institutes of higher education to document the following factors at the start of the funding period:

- How has COVID-19 affected operations in terms of the provision of educational services and the on-going functionality of the institution(s)?
- What resources are/were available to support students/faculty during COVID-19 (March 13 to present)?
- How has COVID-19 exacerbated opportunity gaps that existed prior to the pandemic at your institution(s) and/or geographic location? How has COVID-19 specifically affected lower-income students, students of color, indigenous students, and students with disabilities at the institution?
- How has COVID-19 affected teacher candidates and faculty, specifically teacher candidates and faculty of color, those that are considered lower-income, and/or living with a disability?
- In what ways have the institution’s technology needs increased/ been impacted by COVID-19?

Subsequent reporting will provide documentation of the funding impact on their indicators.

Other Education-related Entities: MDE consulted with the Governor’s Office / Minnesota Children’s Cabinet to identify the best approach for awarding early childhood education funding to eligible educational entities. Governor Walz reserved \$5 million for early childhood education programs.

MDE is collaborating with six regional foundations (Minnesota Initiative Foundations (MIFs) in Greater Minnesota to distribute funding for wrap around early education services targeting the 0-8 age band in rural areas. The MIFs have longstanding ties within their communities that make them valuable partners in accessing needs. They are also geographically distributed across Minnesota; ensuring funds are allocated fairly across the state.

Minnesota Initiative Foundations conducted needs assessments with regional early education service providers in order to determine the areas of greatest impact/need relative to Covid-19. \$2.5 million will be divided equally among the six MIFs to ensure an equitable distribution of funding across the state.

The metro region within Minnesota is not covered under the Minnesota Initiative Foundation umbrella. As such, MDE will run a competitive grant opportunity to select and award grants for metro area projects. \$2.5 million is reserved for the metro area competition and subsequent grant awards.

Prioritizing the needs of low-income students, students with disabilities, English learners, racial and ethnic minorities, migrant students, students experiencing homelessness, children in foster care and rural students disproportionately impacted by the pandemic will be factors in distributing funds.

Applicants for any early childhood funding will be expected to identify in a Statement of Need a description and analysis of data for the targeted group that will benefit from this project and how they were impacted by Covid-19.

ii. “Essential” for carrying out emergency educational service;

Governor Walz determined that the provision of early childhood education programs is essential for carrying out emergency educational services to students. Therefore, \$5 million of Minnesota’s GEER funding was reserved for education-related entities providing these programs.

c. The funding mechanisms (e.g., grants, contracts) the State will use to provide GEER funds to LEAs, IHEs, and/or other education-related entities; and

LEAs: GEER funds will be provided to LEAs through sub grants. LEAs will submit an application to the Minnesota Department of Education (MDE) indicating their distance learning and academic summer school needs. After all K-12 student technology needs related to distance learning are met, any remaining available funds will be used to address increasing the number of staff available for academic summer school programs in order to incorporate social distancing while addressing known student learning gaps as soon as possible. LEAs that serve the greatest number of low-income children or students, children with disabilities, English learners, racial and ethnic minorities, students experiencing homelessness, and foster care youth – as well as students in rural areas of Minnesota – will be prioritized.

IHEs: The funding model for IHEs will ensure funds are available to public institutions, private institutions, and tribal colleges through direct allocation and a rapid competitive grant process.

Other Education-related Entities: \$2.5 million in grants will be awarded to the Minnesota Initiative Foundations for early childhood education. They will administer grant programs on MDE’s behalf providing funding to local early education providers impacted by Covid-19 in rural areas. \$2.5 million is reserved for the metro area competition and subsequent grant awards to other educational entities.

d. Any specific funding conditions or requirements the State will place on awards to ensure the funds are spent for specific purposes or activities.

LEAs: All reimbursement requests will require documentation that funds were spent on allowable costs.

IHEs: The Office of Higher Education will contract with each institute of higher education receiving funding to ensure that the funded requests meet the purpose of and the allowable activities of GEER. For IHE’s receiving funding via competitive grant process, they must submit the following information dependent on the funding category chosen by the institution:

1. Equity in Education: Targeted support of Teacher Preparation Programs and Postsecondary Faculty
 - a. Teacher preparation programs
 - i. Disaggregated number of Minnesota teacher candidates who identify as persons of color, indigenous, low income, or living with disabilities.
 - ii. Uses of funds – a description of how funds were utilized in support of equity in education
 - iii. Amount of funds distributed by use identified in a(ii)
 - iv. Data or evidence on the impact of funds
 - b. Postsecondary Faculty
 - i. Provide disaggregated number of faculty and impacted students who identify as persons of color, indigenous, low income, or living with disabilities
 - ii. Uses of funds – a description of how funds were utilized in support of equity in education
 - iii. Amount of funds by use in b(ii)
 - iv. Data or evidence on the impact of funds
 - c. Lessons learned in the process that impacted the work plan and budget
2. Technology and Remote Learning Needs for Underserved Students
 - a. Disaggregated number of underserved students that benefited from technology and remote learning services through GEER funds
 - b. Uses of funds – a description of how funds were utilized to meet technology and remote learning needs for underserved students
 - c. Amount of funds by use identified in 2b
 - d. Lessons learned in the process that impacted the work plan and budget

Other Education-related Entities: Prior to payment of any reimbursement requests MDE will require two separate reviews and approvals of expenditures. Fiscal monitoring that involves reconciliation of reimbursement requests with supporting documentation will also be conducted.

2. Describe the system of internal controls the State will use to ensure that GEER funds are expended for allowable purposes and in accordance with cash management principles and the Uniform Guidance. See 2 CFR §200.303.

LEAs:

1. **Grant Award Process:** Grant awards will be processed electronically through the state’s accounting system, after approval of awards
2. **Audit Authority:** All awards are subjects to review of the relevant records, documents, and accounting procedures and practices of the LEA and are subject to examination by the Minnesota Department of Education and either the legislative auditor or the state auditor, as appropriate, for a minimum of six years.
3. **Fiscal Procedures:** All GEER awards to LEAs will be tracked using a unique identifier, which can be readily identified and verified. Final narrative and financial reports must be submitted and approved prior to grant closeout. Amendment windows will allow LEAs to make official requested changes and updated to their approved plans. Should there be unexpended funds at the end of the grant period, they will be reallocated to other LEAs or returned to the U.S. Department of Education. Expenditures in excess of approved budget amounts or for unallowable or unapproved costs will be the responsibility of the LEA.

IHEs: In compliance with the State of Minnesota procedures for administration of grant funds will utilize the following internal controls:

1. **Grant Award Process:** Grant contracts will be processed electronically through the state's accounting system, after approval of awards, acceptance of negotiated awards by the project director, and financial review (if applicable).
2. **Audit Authority:** All contracts with IHEs will contain an audit clause indicating that the relevant records, documents, and accounting procedures and practices of the IHE are subject to examination by the Office of Higher Education and either the legislative auditor or the state auditor, as appropriate, for a minimum of six years.
3. **Fiscal Procedures:** All GEER Grant funds must be assigned to individual accounts, which can be readily identified and verified. If an IHE receives more than one grant, separate accounts should be established for each grant. Once a grant contract has been fully executed the IHE may begin related grant activities, which will be reimbursed based on an agreed-upon schedule of payment. Submission of an interim narrative report and an interim statement of project expenditure will be required. Final narrative and financial reports must be submitted and approved prior to grant closeout. Request to change project activities, project personnel, or to move funds between approved budget lines must be submitted in advance, with appropriate justification. Should there be unexpended funds at the end of the grant period, they will be reallocated to other IHEs or returned to the U.S. Department of Education. Expenditures in excess of approved budget amounts will be the responsibility of the IHE.
4. **Final Reports:** Each IHE must submit a final narrative and financial report within thirty (30) days of the conclusion of grant activities. Program financial reports must be submitted from and signed by the institution's chief fiscal officer. At a minimum, the final narrative report must include the reporting that documents how well the objectives of the grant have been met.

Other Education-related Entities: A detailed work plan and budget that is tied to specific GEER Covid-19 activities will be submitted by each MIF to receive a grant. It will include their plan for further distribution of funding to their local early education providers. They will also submit a monitoring plan for how they will maintain oversight of funds administered on MDE's behalf. MDE will require prior approval of any competitive grant opportunities the MIFs post and any subsequent awards to ensure funding is in line with GEER requirements and that internal controls are adequate.

For all grants, (MIF + Metro) MDE will conduct a risk assessment based on organizational capacity, award size, prior experience with the grantee and a search of state and federal disbarment databases to further guide monitoring activities. This will be done prior to execution of any grant awards.

Interim progress reports outlining accomplishments will be collected periodically to evaluate program effectiveness.

Prior to payment of any reimbursement requests MDE will require two separate reviews and approvals of expenditures. Fiscal monitoring that involves reconciliation of reimbursement requests with supporting documentation will also be conducted.

3. If GEER funds are being awarded or used for payments to SEA or IHE administrators, executives, and/or state or local teachers' unions or associations, please describe your process for reporting the amount of funds used for this purpose, and how the funds are consistent with allowable uses of funds under section 18002(c) of the CARES Act.

Not applicable.

4. If you intend to provide GEER funds to LEAs, please describe the process you will use to ensure that LEAs receiving GEER funds provide equitable services to students and teachers in non-public schools located within the LEA in the same manner as provided under section 1117 of the ESEA.

GEER funds will be granted to LEAs who have indicated a need for additional educational technology in order for all students and teachers to adopt equitable distance learning. LEAs, including charter schools and intermediates, serving the greatest number of low-income children or students, children with disabilities, English learners, racial and ethnic minorities, students experiencing homelessness, and foster care youth – as well as students in rural areas of Minnesota – often have the highest needs for technology to support distance learning. LEAs receiving GEER funds will provide equitable services to students and teachers in non-public schools located within the LEA as determined through timely and meaningful consultation with representatives of non-public schools. The State of Minnesota will follow the intent and language of the law by allowing districts to initially distribute the Federal funds to nonpublic schools according to the number of children living in low-income households to prioritize those students with the greatest need. Prior to the interim final rule guidance provided by ED, the Minnesota Department of Education recommended that school systems hold an estimated equivalent of the disputed amount of the funding in escrow and make no draws from that amount until there was a final resolution to the questions about the Federal determination. LEAs are unable to spend or make draws from that amount until the State fully understands the implications of the final interim rule and provides updated guidance.