



Introduction

Missouri received \$54.6 million under the Governor’s Emergency Education Relief (GEER) Fund authorized by the Coronavirus Aid, Relief and Economic Security (CARES) Act. After receipt of Grant Award Notification number S425C200016, Missouri allocated \$24.6 million to the Department of Higher Education and Workforce Development (MODHEWD) and \$30 million to the Department of Elementary and Secondary Education (MODESE). The two agencies have worked collaboratively and with the Governor’s Office to establish greatest impact determinations, state priorities and methods of administration. Projects funded by GEER funds include addressing the digital divide and school transportation for local education agency (LEAs) and institutional support and a workforce development program for institutions of higher education (IHEs).

Process for awarding GEER funds

Timelines

Distribution of funds to LEAs

MODESE estimates that LEA allocations under the two grant programs funded by GEER will be available by August 1, 2020. Grant applications and guidance for both programs will be opened by September 1, 2020. LEA grant applications will be evaluated, approved or returned for revision as quickly as possible. Both grant programs will disburse funds on a reimbursement basis. Approved reimbursement requests will be paid weekly. The timeline for disbursement of funds is dependent on LEAs. However, MODESE estimates that grants will be fully distributed by June 30, 2021.

Distribution of funds to IHEs

MODHEWD estimates that they will begin receiving completed agreements before the end of July and will follow up with institutions that are unable to submit their agreements by August 14. When MODHEWD receives an agreement, funds will be available for the institutions to draw down from the department. When an institution receives its funds, MODHEWD will remind the institution of its reporting requirements, the timeline for reporting use of funds, and its agreement with MODHEWD. MODHEWD will assist institutions throughout the process and preliminarily expects institutions to draw down all funds before June 30, 2021.

Criteria, Process and Deliberations

Local Education Agencies

Uses of Funds for LEAs

Consistent with the certification and agreement for the GEER Fund, the State Education Agency, MODESE, has identified two significant areas of need and methods of identifying the LEAs most impacted by COVID-19 in those areas. Missouri's GEER certification and agreement indicated an intention to support LEAs and non-public schools by addressing the digital divide, providing professional development resources for distance education, and equipping educators to meet the social-emotional learning needs of students. MODESE has determined an additional area of need for LEAs, student transportation. Because getting students to schools is a critical equity issue and because student transportation poses unique challenges in terms of social distancing and public health protection, Missouri has determined that offsetting the COVID-19-related costs associated with student transportation is a critical priority. Missouri has identified alternate funding sources for the distanced professional development and social-emotional learning areas originally proposed for GEER funds. Missouri will address connectivity and transportation using GEER funding.

Criteria for determining LEAs most significantly impacted by coronavirus Digital Divide

As noted in the GEER certification and agreement, Missouri has an estimated 200,000 K-12 students who lack access to digital learning resources. This fact challenges schools to maintain continuity of learning when public health factors cause school closure. Causal factors vary significantly based on local conditions. In many cases, the primary issue is affordability. Families simply cannot afford cellular data or monthly broadband charges. In some areas, broadband infrastructure is simply not present. MODESE, in collaboration with the Missouri Office for Broadband Development, the Missouri Online Research in Education Network, the Department of Higher Education and Workforce Development, the Missouri State Library Network, and the Missouri Department of Natural Resources, have prioritized implementing community Wi-Fi and providing Wi-Fi enabled devices as primary strategies to address internet availability and affordability. The cross-divisional team was the group charged with deliberating the criteria and methodology for identifying the most significantly impacted LEAs in regard to connectivity.

Missouri will use approximately \$15 million of GEER funds allocated to MODESE to address the digital divide. These funds will be made available through grants to LEAs with the greatest connectivity needs and least ability to address them. The focus of the grant program will be to increase the number of Wi-Fi enabled devices available to students. Increasing the availability of Wi-Fi enabled devices is a primary strategy because MODESE, using additional Coronavirus Relief Funds has developed a companion grant program to increase Wi-Fi availability in LEAs. The combination of the two strategies, increasing Wi-Fi and device availability, will significantly increase the number of students able to access the internet and digital learning resources.

The criteria for determining LEAs most significantly impacted by coronavirus are as follows.

- Digital Divide Index, including the Infrastructure adoption sub score

- Device availability from LEA surveys
- Rate of students qualifying for Free and Reduced Lunch

The difference in the capabilities of schools to provide continuity of education during spring 2020, was made clear. While all schools closed, not all schools could provide distanced education effectively. Lack of connectivity and lack of local resources were the primary factors in the difference. The Digital Divide Index and the rate of students qualifying for free or reduced lunch were used to establish an impact index representing COVID impact and burden for each LEA. The logic model is that each of the factors makes it more difficult for students to access remote learning and more difficult for schools to meet students' needs. The impact index is used to identify LEAs with the greatest need and therefore priority for funding allocation.

Transportation for LEAs

The need to address increased student transportation expenses emerged through conversations with school leaders. In the course of several meetings with superintendents, questions around how to safely transport students emerged as a primary concern. To protect public health, schools are implementing a variety of strategies. These include running more bus routes so that each route carries fewer students, using masks, increased sanitation, and adding health aids to busses. All of the strategies increase expenses. MODESE will provide \$15 million in grants to LEAs for student transportation to offset these increased expenses.

Deliberations regarding the distribution of GEER funds to support transportation included the Governor's Office, superintendents, through the Commissioner's Advisory Committee, the Executive Leadership Team of MODESE, and MODESE transportation staff. Discussion included which factors should be used to identify the greatest burden and how to distribute aid.

To determine the level of impact and burden, MODESE has taken three factors into account.

- Number of miles driven
- Number of students transported
- Annual transportation expenses

These three factors provide equity of allocation across districts that have a large geographic area (miles), a large student population (students transported), and cost of transportation (annual expenses). The three factors have been used to develop an index for each LEA. The index representing impact and burden is expressed as the LEA's proportional burden compared to the rest of the state. That proportion is used to determine the proportion of the \$15 million each LEA will receive.

MODESE anticipates opening the application process no later than September 1, 2020. Completion of distribution is dependent on LEA applications for reimbursement.

Institutions of Higher Education

Criteria for determining IHEs that are most significantly impacted by coronavirus

Missouri will use the portion of GEER funds allocated to MODHEWD through grants to IHEs to ensure that students whose success depends on staff, infrastructure and technology to support distance education, or remote learning; academic support for libraries, laboratories, and other academic facilities; institutional support for activities related to personnel, payroll, security, environmental health and safety, and administrative offices; and student services that promote a student's emotional and physical well-being outside the context of the formal instructional program receive the support they need. MODHEWD will achieve these priorities by allocating grants to significantly impacted institutions of higher education. These institutions will use the grant funds to address needs that align with student success.

The criteria used to identify the entities that have been most significantly impacted and are essential for carrying out emergency educational services include:

- **Impact of state budget restrictions.** Among all recipients of state funding, Missouri's public colleges and universities have been the most significantly impacted by dramatic declines in state revenue collections resulting from the coronavirus. In the fiscal year that ended June 30, 2020, about 12 percent of each institution's annual operating appropriation was restricted. These restrictions will severely compromise public colleges' and universities' ability to carry out the services listed above. Including them as a criterion in identifying the institutions that have been most significantly impacted and are essential for carrying out emergency educational services is essential.
- **Numbers of faculty and staff on campus.** Including this factor reflects the reality that the majority of institutions' additional costs to continue to successfully educate students will lie in personnel costs. Institutions with more faculty and staff on campus will spend more on professional development and remote work/teaching capability. Investing in organizations' people and culture will have an impact on every student on campus, and will have long-term positive effect that will support institutions' ability to successfully educate students this fall and in light of new and currently unimagined future scenarios.
- **Overall enrollment, with heavier weight for the number of Pell Grant recipients.** These factors reflect institutions' increased challenges in serving all students, as well as in mitigating additional difficulties many low-income students faced as they transitioned to remote learning.
- **In addition, Missouri will use a portion of its GEER funds to provide grants to low-income adults who enroll in a postsecondary institution to earn a credential that will prepare them to work in a high-demand occupation.** Like many states, Missouri has seen a surge in unemployment claims – many from people who will not return to the job they were laid off from. Access to short-term training programs is essential to these individuals' and the state's economic recovery.

Description of the process and deliberations involved in formulating the criteria

The selection of these criteria was informed by months of surveying and dialog with college and university leaders, the Missouri Coordinating Board for Higher Education, and colleagues throughout state government.

- **Surveys.** In April and May, MODHEWD issued three surveys to identify institutions' unmet financial needs related to coronavirus and the rapid transition to online education. MODHEWD staff also conducted telephone interviews with chief academic officers to learn more about those needs. Each of these feedback mechanisms indicated that while students do need support for remote learning, including improved internet service and devices, their success depends heavily on access to dedicated faculty and staff who can help them navigate the challenges of remote and/or blended learning, cope with financial insecurity and increased stress, and establish personal relationships that keep students connected with institutions as their living and learning environments adapt to coronavirus. This feedback informed the selection of the criteria the state will use to allocate GEER funds and MODHEWD's [after-action report](#) on postsecondary education's online rapid response in spring 2020.
- **Open dialogue.** Commissioner of Higher Education Zora Mulligan holds regular meetings with college and university presidents, chancellors, and other leaders. Commissioner Mulligan has held a running dialog with institutions about the GEER fund and included agenda items specific to the topic during meetings on April 14, May 5, May 12, June 2, and June 16.
- **Discussion with Coordinating Board for Higher Education.** Commissioner Mulligan has discussed GEER funds with members of the CBHE, including discussion at the board's April 21 and June 17 public meetings.
- **Incorporation of GEER fund decisions into statewide coronavirus response strategies.** Missouri is taking a collaborative, cross-department approach to the state's response to the health and economic crises resulting from the coronavirus. Missouri's planned use of GEER funds is an essential element of one of the state's economic recovery priorities: Support struggling Missourians and help citizens become economically resilient. Reopening the state's public colleges and universities and equipping them to meet student needs is necessary to achieve that priority.

Funding Mechanisms

Funding for LEAs

MODESE will distribute GEER Funds to LEAs by using grant processes and by adapting existing infrastructure for applications, approval, allocations, distribution, reporting and monitoring. The transportation grant under GEER will be entitlement-based. The Digital Divide grants will be entitlements to qualifying LEAs.

Use of Funds for IHEs

How funds will be allocated and monitored

Overview

Public colleges and universities will receive GEER funds based on the extent to which they meet each of the criteria identified. They will be instructed that they may use the funds for purposes including staff, infrastructure and technology to support distance education, or remote learning; academic support for libraries, laboratories, and other academic facilities; institutional support for activities related to personnel, payroll, security, environmental health and safety, and administrative offices; and student services that promote a student's emotional and physical well-being outside the context of the formal instructional program, and further that they may not use funds for "administrative or executive salaries and benefits" in accordance with the certification and agreement signed by the State of Missouri and the U.S. Department of Education.

Agreement and reporting

Institutions will sign an agreement with MODHEWD indicating that they will abide by the aforementioned guidance and comply with the reporting requirements detailed in the CARES Act. Institutions will regularly report this information to MODHEWD prior to the deadline for Section 15011(b)(2) of Division B of the CARES Act. MODHEWD will review the submissions and transmit the information to the U.S. Department of Education through the MODESE. Any fund mismanagement or failure to comply with the terms outlined in the agreement between the institution and MODHEWD will be subject to penalty or repayment. MODHEWD will closely monitor and ensure that GEER funds are spent for their allowable purposes.

Communication

Commissioner Mulligan will meet with public institution presidents and chancellors to describe the GEER fund allocations, agreements with MODHEWD, reporting requirements, and process for awarding funds. In addition, MODHEWD will host a webinar with institutions' chief financial officers to describe the process in more detail.

Distribution of funds

MODHEWD staff estimate that they will begin receiving completed agreements before the end of July and will follow up with institutions that are unable to submit their agreements by August 14. When MODHEWD receives an agreement, institutions will be eligible to request funds through the Statewide Advantage for Missouri (SAM II) financial system. When an institution receives its funds, MODHEWD will remind the institution of its reporting requirements, the timeline for reporting use of funds, and its agreement with MODHEWD. MODHEWD will assist institutions throughout the process and preliminarily expects institutions to draw down all funds before June 30, 2021.

Internal Controls

MODESE enters into a Cooperative Agreement on Accounting, Auditing, and Internal Control Activities annually with the State of Missouri, Office of Administration. The current agreement runs through June 30, 2021. The Department's Internal Control Plan is outlined in the Department of Elementary and Secondary Education Accounting Administrative Manual as well as Human Resources Policies and Procedures Manual.

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SEA or IHE Administrative Salaries

As noted above, DHEWD will inform IHEs that GEER funds are not to be used to pay executive salaries. MODESE will distribute all of the GEER funds for the specific purposes noted above. None of the funds will be used for executive salaries at MODESE or MODHEWD.

Equitable Services

MODESE will provide each LEA with a list of the nonpublic schools with which they must consult and to which they must provide services. MODESE further calculates the equitable share amount for each nonpublic school. MODESE will monitor the consultation process through the collection of the Affirmation of Consultation with Nonpublic School Officials for CARES Act forms. MODESE will monitor expenditures for nonpublic school services through the reporting process associated with the grant.