GEER Clarifications – WASHINGTON STATE RESPONSE

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

Funds will be awarded to the Institutions of Higher Education in July or August of 2020.

* 1. The criteria, process and deliberations you use to determine which LEAs, IHEs, and/or other education-related agencies are:
     1. “Most significantly impacted by coronavirus;” and/or
     2. “Essential” for carrying out emergency educational service;

In order to determine how to best use the GEER funds in Washington State, the state Office of Financial Management (the Governor’s budget office) worked with the Governor’s Education policy staff, K-12, higher education and early learning stakeholders to create a list of options to be considered. We evaluated which sectors were most impacted by coronavirus and determined that the higher education sector was severely and immediately impacted with fewer remedies available. While having to change the business model for providing education from in person, to remotely, hit K-12 and Institutions of Higher Education fairly equally, the ability of the higher education sector to be able to continue to carry out essential educational activities was significantly impacted by tuition revenue decreases from enrollment declines.

In Washington State, all public K-12 schools and institutions of higher education shifted to remote learning in March of 2020. K-12 schools continued to receive their full state funding (which is driven out through an apportionment model), and in addition, received additional funds from the Federal ESSER fund.

Institutions of Higher Education in Washington State are funded from a variety of sources, including state support, tuition paid by students (and tuition rates are capped by the state legislature), housing, and food services fees, among other sources of revenue. While state funding for higher education was maintained, many institutions of higher education, especially community colleges, saw drastic reductions in resources due to students choosing to not enroll (and pay tuition and other service fees) in the spring quarter of 2020. Community colleges in Washington State serve many low income, first generation, and communities of color, and we determined that continuing to make educational opportunities available to these populations was crucial for equity in educational access.

We made a recommendation to use GEER funds to provide allocations to the Institutions of Higher Education, weighted heavily toward the community college system, where there are fewer institutional resources that might allow them to continue providing a rich educational curriculum while suffering from declining enrollment.

We sought input from the Washington State Legislature by notifying them of our intent to use GEER funds for higher education, specifically.

* 1. 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

We will provide these funds to the Institutions of Higher Education via an allocation.

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

One condition of receiving the award is that the institutions of higher education who receive funds must use some of those funds to provide support services to students of color. We will require the Institutes of Higher Education who receive an allocation to report to the Office of Financial Management on the activities and programs for which such covered funds were expended, and the estimated number of jobs created or maintained, as applicable, per the CARES Act reporting requirements.

1. 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 §200.313.

The Washington State Administrative and Accounting Manual requires agencies to establish and maintain an effective system of internal controls. Agencies are required to document risk assessment and internal control monitoring activities for objectives related to financial reporting and federal program compliance. Because federal programs are administered at the agency level, the Office of Financial Management (OFM) relies on agencies to establish and maintain effective systems of internal control over federal program compliance. OFM relies on agency internal control systems and the monitoring of those systems to assert in writing that the state has materially complied with the provisions of federal programs in order to comply with the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. As evidence that OFM can rely on each agency’s internal control systems for statewide reporting purposes, every agency head and chief financial officer (CFO) is required to annually sign and submit a Financial Disclosure Certification and, if applicable, a Federal Assistance Certification, to OFM.

Reimbursement of federal funds will be requested after state funds have been expended in support of the program.

1. 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.

We do not intend for the Institutions of Higher education who receive GEER funds to use those funds for payments to administrators, executives, or unions, and we will specify that the funds cannot be used for that purpose in our allocation letters.

1. 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.

We do not intend to provide GEER funds to LEAs.