



# STATE OF WISCONSIN

## DEPARTMENT OF ADMINISTRATION

Tony Evers, Governor  
Joel Brennan, Secretary

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**Date:** July 16, 2020  
**To:** U.S. Department of Education  
**From:** Wisconsin Department of Administration, on behalf of Governor Tony Evers  
**Subject:** Initial 45-day report for GEER Funding

On behalf of Governor Tony Evers, the Wisconsin Department of Administration is pleased to submit Wisconsin's initial 45-day report for the GEER funding awarded on June 1, 2020. For clarity, the four required components are included, with Wisconsin's response following each component.

**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;**
- 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**
  - ii. **"Essential" for carrying out emergency educational service;**
- 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**
- d. **Any specific funding conditions or requirements the State will place on awards to ensure the funds are spent for specific purposes or activities.**

The State is finalizing the design and implementation of a system for awarding GEER funds to LEAs throughout Wisconsin that will be easy to access, ensures fiscal accountability, and, most important, that provides timely funding to address the educational needs of the school districts that have been most significantly impacted by coronavirus in Wisconsin. The State intends to make award funds available to LEAs in as expedited a manner as possible, particularly in light of the back to school discussions happening in Wisconsin LEAs. We want to ensure LEAs meeting Wisconsin's definition of most significantly impacted by coronavirus have the additional resources they need as they make decisions about how students will learn in the upcoming school year. One piece of this is the importance of remote learning as an option to deliver a high-quality education to students during the COVID-19 pandemic. Technological capacity and access are necessary for all students for remote learning to be a successful model of instruction.

In close consultation with State education leaders at the Wisconsin Department of Public Instruction (DPI), the Governor's Office has developed a set of criteria that considers four different factors:

1. Percent of economically disadvantaged students enrolled in the district
2. Percent of households in the district with no access to personal computing devices
3. Percent of households in the district with no access to internet service
4. Percent of students scoring "Below Basic" on the English Language Arts Assessment

With the exception of one school that will not be in operation during the 2020-21 school year, all LEAs were scored according to the aforementioned criteria. Those in the top 35% of all LEAs in Wisconsin based on the above criteria were deemed to be the most impacted by school closures, and thus eligible for GEER Funds. GEER funds will be dispersed to those LEAs that qualify based on their 2019-20 enrollment numbers.

In addition, three Wisconsin tribal schools will receive GEER funds. The Governor's Office identified these education-related entities to receive GEER awards based on two factors. First, 100% of the students that attend these tribal schools receive free-and-reduced price lunch, which indicates the students are economically disadvantaged. Second, a significant portion of the student population for these tribal schools report issues accessing internet service at home and/or not having access to any personal computing devices at home that would allow participation in remote learning. They will receive the same per pupil payment as the LEAs.

The State will provide GEER funds to LEAs through the WISEgrants system, which is an online portal developed by DPI and used regularly by LEAs and private schools across the state. Use of the WISEgrants portal will ensure GEER funds are spent only on eligible items as more fully described in the State's response in section 2. The State is also working towards providing GEER funds to tribal schools through the same portal.

**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.**

The State will use the system of internal controls and grant monitoring procedures established by DPI and used for its federal grants that are subject to the requirements of the Uniform Guidance (2 CFR 200) and the Education Department's General Administrative Regulations (EDGAR), to ensure funds are used for allowed purposes under GEER. These established internal controls and monitoring plans include the following:

- Conducting a fiscal risk assessment as prescribed in 2 CFR 200.331(b), and applying appropriate terms and conditions to subawards to mitigate identified risks.
- Developing and providing technical assistance to subrecipients to ensure they understand GEER awards must be used to address issues related to supporting remote learning for all students, including historically underserved populations. Technical assistance resources and activities are expected to include:
  - Collaborating with the Wisconsin Association of School Business Officials to host a conference on grant requirements.
  - Providing one-on-one support to LEAs as needed.
  - Making available general and GEER-specific federal grant information via the web:
    1. General federal grants management information:  
<https://dpi.wi.gov/wisegrants>. This website provides technical assistance documents for LEAs regarding the Uniform Guidance (2 CFR 200) including written procedures for cash management, verifying allowable costs, and conflicts of interest.
    2. GEER grant requirements: URL to be announced. This website will provide the following technical assistance documents:
      - a. Start guide for LEAs;
      - b. Frequently Asked Questions;
      - c. Ensuring compliance with GEPA 427;
      - d. Equitable Participation for Private Schools;
      - e. Ensuring the LEA is paying employees to the greatest extent practicable;
      - f. Eligible costs; and
      - g. Reporting requirements.
- Developing a GEER grant application review guide and a training plan for grant reviewers to ensure consistency during the GEER grant application review.
- Requiring subrecipients to comply with Wisconsin's Uniform Financial Accounting Requirements (WUFAR).
- Administering GEER grants through the WISEgrants system, which as previously noted, is an online portal developed by DPI and used regularly by LEAs and private schools across the

state. The system aligns with the Uniform Guidance, EDGAR, and WUFAR and will require LEAs to complete the following steps for GEER grants:

1. Digitally sign assurances that the LEA will comply with the provisions of all applicable statutes and regulations, including an assurance about maintaining staff to the extent practicable.
  2. Digitally sign assurances that meet the requirements of section 442 of the General Education Provisions Act (GEPA) (20 U.S.C. 1232e).
  3. Upload an affirmation of consultation form from each private school located within the school district's boundaries confirming or denying their participation in GEER grant services. Amounts for equitable participation will automatically be calculated in WISEgrants.
  4. Provide a description of the steps the LEA proposes to take to ensure equitable access to, and participation in, its Federally-assisted program for students, teachers, and other program beneficiaries who may experience any of these barriers: gender, race, national origin, color, disability, and age as required under GEPA Section 427.
  5. Develop separate budgets, under a single grant, for regular education, special education, and private school equitable services. The WISEgrants system will allow:
    - a. Each detailed budget item to be tied to an allowable activity under Section 18003(d), including Educational Technology.
    - b. Each detailed budget item to be tied specific private schools served by the LEA.
    - c. Staff FTE to be collected to determine the LEA's need to use federal funds to continue employing existing staff.
    - d. Carryover amounts to be tracked for each budget type (regular education, food service, special education and private school services).
  6. Claim funds based upon DPI-approved applications, only. Funds will be claimed and reimbursed by budget type (general education, special education, private school services) and by allowable GEER activity (educational technology, etc.).
  7. Grant Award Notifications to be provided to LEAs and retained.
- Reviewing claims for reimbursement to ensure compliance with the approved budget/allowable costs.
  - Retaining grant applications, claims, and other data in WISEgrants to meet the state and federal records retention requirements.
  - Reviewing single audits in order to issue management decisions in accordance with 2 CFR 200.331

**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.**

GEER funds will not be awarded or used for payments to SEA or IHE administrators, executives, and/or state or local teachers' unions or associations.

**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.**

The WISEgrants system will ensure that LEAs receiving GEER funds provide equitable services to students and teacher in non-public schools as required by law. The process used for GEER funds will be the same as that for ESEA, which involves meaningful consultation and submission of Affirmation of Consultation forms. Specifically,

as part of their application in WISEgrants, LEAs must upload an affirmation of consultation form from each private school located within the school district's boundaries confirming or denying their participation in GEER grant services. Amounts for equitable participation will automatically be calculated in WISEgrants.

Guidance documents related to GEER equitable participation will be developed and made available through the GEER website described above. See the State's response in section 2 for more detail.