



45-Day Reporting Requirements
Governor’s Emergency Education Relief (GEER) Fund
South Carolina
July 30, 2020

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;

South Carolina’s process for awarding GEER funds is to maximize all available state, other, and federal funds allocated or appropriated to assist public and private schools (K-12) and institutions of higher education that have been significantly impacted by the COVID-19 pandemic. To assist our office and the General Assembly in allocating funds from the Coronavirus Relief Fund (CRF) and in coordinating the expenditure of these funds with other Coronavirus Aid, Relief, and Economic Stimulus (CARES) Act funds, South Carolina retained Guidehouse, Inc. to build and operationalize the SC CARES Grant Management Program. Guidehouse, Inc. will work with the Department of Administration, the Executive Budget Office, the Office of the Governor and appropriate legislative staffs to ensure accountability for the expenditure of CARES Act funds.

Regarding the GEER fund, Guidehouse, Inc. will provide advice to the Office of the Governor and to the Executive Budget Office in awarding GEER funds. GEER funds will be awarded as a grant with the purposes or requirements of the grant explicitly specified in the award letter. Funds will be awarded based on the educational needs in our state for which CRF and other CARES Act monies have been allocated or appropriated.

Below is the original timeframe by which GEER funds would have been obligated; however, a legal challenge may impact the timeframe:

Date	Action
June 23 - 25, 2020	SC General Assembly is in session to authorize expenditure of a portion of our state's allocation of Coronavirus Relief Fund (CRF) monies in Phase 1
July - August 2020	GEER Funds Allocation – Phase 1
September 2020	SC General Assembly is in session to authorize expenditure of portion of CRF Funds in Phase 2
October - December 2020	GEER Funds Allocation – Phase 2

On July 9, 2020 Governor McMaster announced the first allocation of GEER Funds - \$2,423,396 for our state's historically black colleges and universities (HBCUs) to improve remote learning. Both public and private HBCU institutions are included. The allocation to each HBCU was based on the formula by which federal funds authorized under the Higher Education Emergency Relief Fund (HEERF) were dispersed: overall student enrollment at each institution and the percentage of Pell Grant recipients enrolled at each institution. The Governor will require each HBCU to sign a memorandum of agreement. The agreement will require public reporting that documents the expenditure of the funds and that measures the outcomes of the grant. The focus will be on addressing the impact of COVID-19. South Carolina wants to be an example of fiscal integrity, ensuring that we report publicly to our taxpayers how funds are spent and the impact of those funds. Our Office is in the process of entering memorandum of understanding with each HBCU.

On July 20, 2020 Governor McMaster announced the allocation of \$32,000,000 from the GEER Funds for Safe Access to Flexible Education (SAFE) Grants. Parents apply for SAFE Grants using an online platform. The online platform will determine student eligibility and then electronically make payments or subgrants to eligible K-12 schools on behalf of students in kindergarten through grade 12 approved for the grant. Student eligibility is defined as a student whose family income is 300 percent or less of the federal poverty level and who is enrolled in school year 2020-21 in an eligible independent school.

On July 21, 2020 a temporary restraining order was issued to prevent Governor McMaster from distributing GEER funds for the SAFE Grants.

On July 28, 2020 our office notified the HBCUs that, while, the temporary restraining order does not directly address the allocation to HBCUs, the lawsuit challenges the Governor's authority to allocate emergency GEER funding. Accordingly, the planned GEER fund allocation to HBCUs is suspended until further notice.

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;

The South Carolina Department of Education has identified the school districts most significantly impacted by the coronavirus pandemic and the closure of school buildings. The criteria used to identify these school districts were:

1. Per capita COVID-19 infections in each school district;
2. Percentage of students in poverty in each school district in the current school year. Students in poverty are students who qualify for Medicaid, Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), or are homeless, transient, or in foster care;
3. Each school district’s ability to use remote learning during the period of school closures. School districts used eLearning, blended learning or paper-and-pencil packets during the closure; and
4. Each school district’s index of taxpaying ability (ITA), which is a measure of the district’s relative wealth compared to all other districts in the state.

To date, we know that our historically black colleges and universities (HBCUs) have been identified by accelerateSC as having been significantly impacted by the pandemic. On April 20, 2020, Governor McMaster created accelerateSC, a group of 30 leaders from across our state representing health care, business and industry, law enforcement, education, the faith-based community, counties and municipalities. AccelerateSC was charged with considering and recommending economic revitalization plans for South Carolina. The objective was to determine how to accelerate our state’s economic engine. accelerateSC recommended that Governor McMaster allocate 5 percent of the GEER funds to the historically black colleges and universities for hardware upgrade, software, eLearning resources, and electronic textbooks to support online instruction. The recommendations of accelerateSC are posted online at <https://accelerate.sc.gov/>.

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

South Carolina will use a combination of grants and contracts. At a minimum, any entity that receives GEER funds will be required to sign a memorandum of agreement. These agreements and contracts will include reporting requirements that comply with federal reporting requirements.

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

South Carolina wants to be an example of fiscal integrity, ensuring that we report publicly to our taxpayers and to the US Department of Education how funds are spent and the impact

of those funds. We will require all grantees to report on how the funds were expended and the outcomes achieved.

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.

South Carolina will use the services of a professional grant services entity to ensure that the GEER funds are expended for allowable purposes and in accordance with cash management principles and the Uniform Guidance.

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.

To date, South Carolina does not intend to award GEER funds for any of these entities.

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.

If GEER funds are allocated to LEAs, the grant award will require that any LEA receiving provide equitable services to students and teachers in non-public schools located within the LEA. The reporting requirements will also require LEAs to document how students and teachers in non-public schools were provided equitable services.