



REPORT

District of Columbia CARES-GEER 45-Day Report

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 District will use GEER funds to provide support to the Office of the State Superintendent of Education (OSSE), which the Mayor deems essential for carrying out emergency educational services to students for authorized activities described in section 18003(d)(1) of the CARES Act and social and emotional support.

The Mayor deemed OSSE essential for carrying out emergency educational service because it is the state education agency. The Mayor also deemed OSSE essential because it is the only public educational agency that can enter into contractual agreements providing for technological, mental health, and school safety services to students with consideration for both public and public charter sectors.

These contractual agreements will take the form of memoranda of understanding (MOU) and comply with the District's contracting, procurement, and anti-deficiency laws. Specifically, OSSE intends to enter into MOUs with (1) the D.C. Office of Chief Technology Officer to provide technology services to students and to reduce the digital divide; (2) the D.C. Department of Behavioral Health to provide mental health services to students; and (3) the D.C. Office of Neighborhood Safety and Engagement to provide school safety services and support to students. The above-named agencies have subject matter expertise, existing portfolio and capacity to provide the named services and have demonstrated success in providing such services.

OSSE will enter into MOUs with the above-named state agencies all of which will have option year extensions until Sept. 30, 2022. Each MOU will detail the responsibilities of parties, which will include delivery of specific services aligned to the allowable uses of GEER funds. Moreover, each MOU is subject to federal and District anti-deficiency law, prohibiting the funds to be used for an unauthorized or unappropriated purpose. Furthermore, MOUs will include reporting requirements on spending, including to satisfy reporting requirements of the Federal Funding Accountability and Transparency Act of 2006 (FFATA), Pub.L.109-282, which provides an additional mechanism for ensuring allowable uses.

July 10, 2020

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 §200.313.

Transactions with other DC Agencies, including the three planned GEER MOUs, are handled through the Intra-District process. The participating agencies agree to the terms of the services provided via an MOU outlining the terms of the agreement in alignment with the allowable uses of GEER funds and intended focus areas based on DC's approved application. The MOU is signed off by all responsible parties and the funds advance to the respective seller agencies. Once the seller agency receives the advance, it is able to establish budget and will submit a spend plan to Office of Budget & Planning (OBP) to have that budget established in the appropriate comptroller source groups to spend based on the terms of the agreement.

On a monthly basis, OSSE's Office of the Chief Financial Officer (OCFO) accounting department runs a review of the spending via two financial system transaction reports for intra-district revenue and expenditures.

- The DAFR 550 report: shows all the spending on the Intra-District project during the fiscal year. *The expenditure less revenue represent the available balance to bill and represents the spending since the last billing.*
- Actual expenditures: Shows the available spending during this period. *At the end of the fiscal year, the Intra-District balance has to be closed out and any unspent funds have to be returned to the buyer agency.*

Cash Management responsibilities are coordinated between the agencies' accounting departments and the District's Office of Finance and Treasury. OCFO works with OSSE staff for the application, administration, and financial management of each grant, including the drawdown of funds, grantor reporting requirements and the overall successful implementation of the grant. Seller agencies will provide to OSSE on a documentation that supports allowable expenditures per the MOU that form the basis of the drawdown or other claim for reimbursement. OSSE program staff will review drawdowns/claims for reimbursement against the approved agreement in coordination with OCFO's fiscal review. The drawdown process for the District's federal grants are done for compliance with the Cash Management Improvement Act (CMIA) requirements.

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.

N/A. DC does not intend to award GEER funds 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.

N/A. DC does not intend to grant GEER funds to LEAs.