

## GEER<sup>1</sup> Monitoring – Program Fiscal and Program Requirement Domains – Grantee Self-assessment

### A. State Context

CARES Act  
Section 18002

CRRSA Act  
Section 312

GEER Certification and Agreement

Description: Congress set aside approximately \$3 billion of the \$30.75 billion allotted to the Education Stabilization Fund through the Coronavirus Aid, Relief, and Economic Security (CARES) Act for the Governor’s Emergency Education Relief Fund (GEER Fund) and \$4 billion through the Coronavirus Response and Relief Supplemental Appropriations (CRRSA) Act to include both GEER funding and funding for an Emergency Assistance to Non-Public Schools (EANS) program. The Department awarded grants to Governors to address the impact that COVID-19 has had, and continues to have, on the education activities in their States. Funds must be used for allowable activities to prevent, prepare for, and respond to COVID-19.

Recommended Participants: GEER Program Director, Program Attorney(s), Program Accountant(s)

#### Subtopics:

- State Context – Implementation
- State Context – K-12 Impact
- State Context – Fiscal Impact
- State Context – Technical Assistance

### *Self-Assessment Questions*

<i>Subtopic</i>	<i>Questions</i>	<i>Response</i>
<b>GEER I &amp; II:</b> State Context –	In general, how is the implementation of the GEER program proceeding?	<i>(Enter brief response here)</i>

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<sup>1</sup> GEER I refers to GEER funds authorized under the CARES Act. GEER II refers to funds authorized under CRRSA. GEER I and II funds may be used for pre-award costs dating back to March 13, 2020, when the national emergency was declared. For GEER I, the grantee was required award the funds within one year of receiving them, which was April through June 2021, depending on the award date. GEER I funds were available for obligation by the grantee and subrecipients through September 30, 2022. For GEER II, the grantee was required to award the funds within one year of receiving them, which was January 2022. GEER II funds are available for obligation by the grantee and subrecipients through September 30, 2023.

Implementation		
<b>GEER I &amp; II: State Context – Implementation</b>	What have been some of the major barriers (if any) to implementation? Were there any difficulties in obtaining personal protective equipment and other supplies necessary to ensure that school personnel were safe? How have the barriers to implementation changed from 2020 to today?	<i>(Enter brief response here)</i>
<b>GEER I &amp; II: State Context – Implementation</b>	What actions taken by the State or LEAs in response to the pandemic and its impact on public K-12 education do you believe was the most effective and/or the most essential?	<i>(Enter brief response here)</i>
<b>GEER I &amp; II: State Context – Implementation</b>	Please describe how the State determined needs to be addressed using GEER funds in 2020 at the start of the pandemic. Please also explain, if new needs were identified, how the determination of needs changed when implementing GEER II.	<i>(Enter brief response here)</i>
<b>GEER I &amp; II: State Context – Implementation</b>	How did overall implementation of the GEER program change during the pandemic (March 2020 to current day)?	<i>(Enter brief response here)</i>
<b>GEER II: State Context – Implementation</b>	Did the State use any of its other CARES Act or CRRSA Act funds, such as the Coronavirus Relief Fund, to support K-12 education in the State? If yes, how did access to those funds impact how the State implemented the GEER program?	<i>(Enter brief response here)</i>
<b>GEER I &amp; II: State Context – K-12 Impact</b>	Has the State experienced a decline in enrollment in K-12 public schools? If so, what do you think the underlying cause is? Are the declines across the board or more prominent among certain groups of students, such as students from high-income families or students from low-income families? Are private school enrollments increasing? Is home-schooling increasing? Does the State have a strategy to recapture these students?	<i>(Enter brief response here)</i>
<b>GEER I &amp; II: State Context – K-12 Impact</b>	Please describe any declines in the number of K-12 public school teachers because of the pandemic and detail how the State has addressed these declines.	<i>(Enter brief response here)</i>
<b>GEER I &amp; II: State Context – Fiscal Impact</b>	Are you aware of any waste, fraud, or abuse regarding GEER fund grants, subgrants or contracts, either at the State or local level? If so, what was the process used to identify and report the issue? What type of follow-up occurred or occurs when waste, fraud, or abuse is identified?	<i>(Enter brief response here)</i>
<b>GEER I &amp; II: State Context – Technical Assistance</b>	What assistance or information can the Department provide to help the State with its implementation?	<i>(Enter brief response here)</i>

## On-site/Desk Review Questions

<i>Subtopic</i>	<i>Question</i>	<i>Response</i>
TBD	*** Desk review questions will be derived from the initial review of the self-assessment responses, and other documentation and reports submitted by grantees and LEAs or other subrecipients. ***	

### B. Budgeting of the Administrative Reservation (as applicable) and Subawards<sup>2</sup>

CARES Act  
Section 18002(c)

CRRSA Act  
Section 312(c)

GEER Certification and Agreement

EDGAR  
[34 C.F.R. 76.530 \(General Cost Principles\)](#)

Uniform Guidance  
[2 C.F.R. 200.403-475](#)

Description: A grantee and its subrecipients can only use program funds for allowable costs, as defined in the Uniform Administrative Requirements, Cost Principles, and Audit Requirements (2 C.F.R. Part 200), which include, among other things, the requirement that costs be reasonable and necessary for the accomplishment of program objectives, which are to prevent, prepare for, and respond to coronavirus. Additionally, with funds not otherwise allocated, a State may reserve a reasonable amount necessary to administer the grant.

Recommended Participants: GEER Program Director, Program Attorney(s), Program Accountant(s)

#### Subtopics:

- Budget Development Process
- Assurances – Administrative or Executive Salaries and Benefits
- Support for Development of Subrecipient Program Budgets
- Review of Subrecipient Program Budgets

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<sup>2</sup> This section covers subawards to subrecipients, which are distinct from contracts and the procurement process. Procurement requirements are covered in a separate, cross-cutting fiscal protocol.

Suggested documentation:

- Documented procedures for developing budgets, including criteria staff use to evaluate proposed costs and activities
- Technical assistance or guidance documentation (handbooks, emails, presentations, etc.) provided to subrecipients
- Budget documentation
- Budget or other documentation demonstrating State administrative costs
- For subrecipients participating in this review – submitted budgets or applications for GEER as well as any communications between the grantee and the subrecipient during the application review process
- Sample guidance or other communications with subrecipients regarding how program funds are to be used (including any cost allowability requirements)
- Other documentation that would serve as evidence for the questions asked

*Self-Assessment Questions*

<b>Subtopic</b>	<b>Questions</b>	<b>Response</b>	<b>Supporting Documentation</b>
<b>GEER I &amp; II:</b> Budget Development Process	How did the grantee prepare budgets and plan for the use of administrative funds from GEER?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Budget Development Process	If applicable, did the grantee continue to pay its employees and contractors during the period of any disruptions or closures related to COVID-19?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Budget Development Process	How is the grantee monitoring subrecipient compliance with the requirement that, to the greatest extent practicable, they continue to compensate their employees and contractors?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Support for Development of Subrecipient Program Budgets	Please describe how you provide guidance or technical assistance to subrecipients for the purposes of their budget preparation.	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Review of Subrecipient Budgets	If applicable, please describe the process used to review subrecipient budgets and/or other information submitted during the application review process for GEER to ensure that subrecipient proposed uses of funds are only for allowable activities and allowable expenditures.	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Assurances – Administrative or Executive Salaries and Benefits	How did the grantee ensure that eligible entities did not use GEER funds for executive compensation?	<i>(Enter brief response here)</i>	

<b>GEER I &amp; II: Review of Subrecipient Budgets</b>	How does the grantee ensure that GEER reimbursements, pre-award costs, or other allowable expenditures were incurred on or after March 13, 2020 (the date the President declared the national emergency due to COVID-19)?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II: Review of Subrecipient Budgets</b>	What is the grantee's process for determining if the above expenses are:		
<b>GEER I &amp; II: Review of Subrecipient Budgets</b>	<ul style="list-style-type: none"> <li>• <i>Consistent with the purposes of GEER (to prevent, prepare for, and respond to coronavirus)?</i></li> </ul>	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II: Review of Subrecipient Budgets</b>	<ul style="list-style-type: none"> <li>• <i>Allowable under CARES 18002(c) and CRRSA 312(c) to provide educational services to students and/or to support the on-going functionality of an LEA or IHE, or are otherwise specifically authorized by the plain statutory language and context of § 18002(c)(3) of the CARES Act) and § 312(c) of the CRRSA Act?</i></li> </ul>	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II: Review of Subrecipient Budgets</b>	<ul style="list-style-type: none"> <li>• <i>Reasonable &amp; necessary?</i></li> </ul>	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II: Review of Subrecipient Budgets</b>	Does the grantee have a process to evaluate prior approval requests from subrecipients? If so, please describe that process.	<i>(Enter brief response here)</i>	
Additional Documentation	For all subtopics, provide any additional documentation that would serve as evidence for the questions asked.	<i>(Enter list of documents here)</i>	

**On-site/Desk Review Questions**

<b>Subtopic</b>	<b>Question</b>	<b>Response</b>
TBD	*** Desk review questions will be derived from the initial review of the self-assessment responses, submitted supporting documentation and other documentation and reports submitted by grantees. ***	

**C. Allocations/Sub-Award Process**

CARES Act  
Section 18002(c)

CRRSA Act  
Section 312 (c)

[Davis-Bacon and Related Acts](#)

EDGAR

[34 C.F.R. 76.50](#)

[34 C.F.R. 76.51](#)

[34 C.F.R. 76.300](#)

[34 CFR 76.600](#)

[34 CFR 75.600-75.618](#)

[34 C.F.R. 76.789](#)

[34 C.F.R. 76.792](#)

Uniform Guidance

[2 C.F.R. 200.331\(a\)](#)

[2 CFR 3474](#)

**Description:** The grantee shall ensure that, when subawarding funds to subrecipients, it makes subawards in accordance with applicable statutory requirements (including requirements related to the process for subawarding funds and the amounts to be subawarded to individual subrecipients).

**Recommended Participants:** GEER Program Director, Program Attorney(s), Program Accountant(s)

**Subtopics:**

- Allocations
- Subaward Application Submission
- Prior Approval Process and Construction
- Grant Award Notice

**Suggested documentation:**

- Program manual or handbook excerpt or link describing subrecipient allocation process for GEER
- Subrecipient application template or link for GEER (or a consolidated plan template if used)
- If not included in program manual or handbook for GEER, descriptions of:
  - Process used to calculate subrecipient amounts
  - Sample subrecipient award notice for GEER
  - List of subrecipients (including amounts) for each GEER subrecipient for the current fiscal year, as applicable
  - Documentation (or description) of process used to review, verify, and approve subrecipient calculations prior to award
  - Other documentation that would serve as evidence for the questions asked

*Self-Assessment Questions*

<b>Subtopic</b>	<b>Questions</b>	<b>Response</b>	<b>Supporting Documentation</b>
<b>GEER I &amp; II:</b> Allocations	How did the grantee determine which IHEs, LEAs, or education related entities within the State were deemed essential for carrying out emergency educational services to students for authorized activities?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Allocations	If applicable, how did the grantee determine which IHEs have been most significantly impacted by coronavirus?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Allocations	If applicable, how did the grantee determine which significantly impacted IHEs would be served?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Allocations	Please describe any differences in process, outlined above, for distribution of GEER I funding as compared to GEER II funding.	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Allocations	If applicable, how did the grantee and/or SEA determine which LEAs have been most significantly impacted by coronavirus?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Allocations	If applicable, how did the grantee determine which significantly impacted IHEs would be served?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Allocations	If applicable, please describe any differences in process, outlined above, for distribution of GEER I funding as compared to GEER II funding.	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Allocations	If applicable, how did the grantee determine which other educational entities have been most significantly impacted by coronavirus?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Allocations	If applicable, how did the grantee determine which significantly impacted other educational entities would be served?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Allocations	If applicable, please describe any differences in process, outlined above, for distribution of GEER I funding as compared to GEER II funding.	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Allocations	If applicable, please describe the process for determining, at the discretion of the Governor, how to distribute GEER funds, including any process for determining subaward and/or contract amounts, and	<i>(Enter brief response here)</i>	

	obtaining and reviewing data to calculate award amounts and determine eligibility.		
<b>GEER I &amp; II:</b> Allocations	If applicable, please describe the process for determining, at the discretion of the Governor, whether GEER funds would be provided through subawards or contracts?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Allocations	Please describe the process for determining whether subawards and/or contracts for GEER funds would be awarded competitively or noncompetitively? If noncompetitive awards of grants or contracts were made, how did the grantee determine this was the right thing to do?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Allocations	If applicable, please describe any differences in process, outlined above, for distribution of GEER I funding as compared to GEER II funding.	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Allocations	To the extent applicable, how did the Governor work with the SEA to determine which LEAs were most significantly impacted by coronavirus, and distribute funds? Did this process and the resulting identification of LEAs change between GEER I and GEER II?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Allocations	After determining how GEER funds would be distributed, describe the grantee's process for notifying and distributing GEER funds to eligible recipients. Address any changes in notification or distribution processes between GEER I and GEER II.	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Application Submission	If applicable, describe how the grantee collects subrecipient information for grant awards from eligible entities for GEER I and GEER II.	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Application Submission	If applicable, describe how the grantee collects subrecipient information for contracts from eligible entities for GEER I and GEER II.	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Application Submission	If applicable, describe how the grantee collects subrecipient information for inter-agency agreements from eligible entities for GEER I and GEER II.	<i>(Enter brief response here)</i>	



<b>GEER I &amp; II:</b> Prior Approval Process and Construction	Please describe the grantee’s process to evaluate subrecipient prior approval requests for construction, remodeling, alterations, renovations, or repairs projects, including how the grantee ensures that the projects are related to preventing, preparing for, or responding to COVID-19.	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Prior Approval Process and Construction	What guidance and/or technical assistance does the grantee provide to subrecipients regarding the requirements under Davis-Bacon and Related Acts and other requirements around construction, renovation, and other applicable projects?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Grant Award Notice	Does the grantee’s subrecipient Grant Award Notice for GEER I and GEER II include the required information from <a href="#">2 C.F.R. 200.331(a)</a> ?	<i>Yes/No (Circle One)</i>	
Additional Documentation	For all subtopics, provide any additional documentation that would serve as evidence for the questions asked.	<i>(Enter list of documents here)</i>	

**On-site/Desk Review Questions**

<i>Subtopic</i>	<i>Question</i>	<i>Response</i>
TBD	*** Desk review questions will be derived from the initial review of the self-assessment responses, submitted supporting documentation and other documentation and reports submitted by grantees.***	

**D. Transparency Act Reporting**

CARES Act  
Section 15011

CRRSA Act  
Section 312(a)

Federal Funding Accountability and Transparency Act of 2006 (FFATA), Pub.L. 109-282, as amended by the Digital Accountability and Transparency Act (DATA Act), Pub.L. 113-101

Reporting Subaward and Executive Compensation Information (2 C.F.R. Part 170)  
[2 C.F.R. 170.220\(a\)](#)

[2 C.F.R. 170 App. A](#)

Uniform Guidance  
[2 C.F.R. 200.300\(b\)](#)

**Description:** States that received ESSER I, ESSER II, ARP ESSER, GEER I, GEER II, EANS I or APR EANS funds must comply with the FFATA reporting requirements. On a monthly basis, a State is required to report information identifying subrecipients (name, address, UEI) and subawards (CFDA number, award number, title) if, at any point during the award period, the SEA subawards \$30,000 or more in program funds (cumulatively) to any single subrecipient. For more information on FFATA see [FSRS – Federal Funding Accountability and Transparency Act Subaward Reporting System](#).

**Recommended Participants:** GEER and EANS Program Directors, Program Attorney(s), Program Accountant(s)

**Subtopics:**

- FFATA Reporting
- FFATA Data Accuracy

**Suggested documentation:**

- Documented policies and procedures for FFATA reporting
- Other documentation that would serve as evidence for the questions asked

**Self-Assessment Questions**

<b>Subtopic</b>	<b>Questions</b>	<b>Response</b>	<b>Supporting Documentation</b>
<b>GEER I &amp; II:</b> FFATA Reporting	What process does the grantee use to ensure that all required Federal Funding Accountability and Transparency Act (FFATA) subawards are reported accurately to the FFATA subaward reporting system (FSRS) in accordance with established timelines (i.e., by the end of the month following the month in which the qualifying award was made)?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> FFATA Reporting	Who is responsible for submitting FFATA reports for the grantee?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> FFATA Reporting	If the grantee has experienced reporting challenges, what documentation was provided to the Department to serve as evidence of effort made to resolve issues?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> FFATA Reporting	What is the current status of grantee FFATA subaward reporting? Are there any outstanding	<i>(Enter brief response here)</i>	

	issues?		
<b>GEER I &amp; II: FFATA Reporting</b>	What internal controls are in place to ensure accurate subaward reporting?	<i>(Enter brief response here)</i>	
<b>EANS and ARP EANS: FFATA Reporting</b>	What process does the grantee use to ensure that all required Federal Funding Accountability and Transparency Act (FFATA) subawards are reported accurately to the FFATA subaward reporting system (FSRS) in accordance with established timelines (i.e., by the end of the month following the month in which the qualifying award was made)?	<i>(Enter brief response here)</i>	
<b>EANS and ARP EANS: FFATA Reporting</b>	Who is responsible for submitting FFATA reports for the grantee?	<i>(Enter brief response here)</i>	
<b>EANS and ARP EANS: FFATA Reporting</b>	If the grantee has experienced reporting challenges, what documentation was provided to the Department to serve as evidence of effort made to resolve issues?	<i>(Enter brief response here)</i>	
<b>EANS and ARP EANS: FFATA Reporting</b>	What is the current status of grantee FFATA subaward reporting?	<i>(Enter brief response here)</i>	
<b>EANS and ARP EANS: FFATA Reporting</b>	What internal controls are in place to ensure accurate subaward reporting?	<i>(Enter brief response here)</i>	
Additional Documentation	For all subtopics, provide any additional documentation that would serve as evidence for the questions asked.	<i>(Enter list of documents here)</i>	

**On-site/Desk Review Questions**

<b>Subtopic</b>	<b>Question</b>	<b>Response</b>
TBD	*** Desk review questions will be derived from the initial review of the self-assessment responses, submitted supporting documentation and other documentation and reports submitted by grantees. ***	

**E. Risk Assessment (Subrecipient)**

Uniform Guidance  
[2 C.F.R. 200.332\(b\)](#)

**Description:** To determine the appropriate method and level of subrecipient monitoring, a grantee shall evaluate each subrecipient’s risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward.

**Recommended Participants:** Chief Financial Officer (or CFO representative), GEER Program Director, GEER Program Attorney(s)

**Subtopics:**

- Subrecipient Risk Assessment Process
- Use of Subrecipient Risk Assessments
- Risk Data and Risk Assessment Improvements

**Suggested documentation:**

- Documented risk assessment policies and procedures
- Sample risk assessment frameworks, tools, etc.
- Explanations (and examples) of how risk assessments are utilized to inform program management
- Other documentation that would serve as evidence for the questions asked

**Self-Assessment Questions**

<b>Subtopic</b>	<b>Questions</b>	<b>Response</b>	<b>Supporting Documentation</b>
<b>GEER I &amp; II:</b> Subrecipient Risk Assessment Process	Does the grantee have a documented process to assess subrecipient risk for GEER I and II? If so, when does the grantee evaluate each subrecipient’s risk level? Are all subrecipients included in the process?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Subrecipient Risk Assessment Process	What risk indicators are included in the grantee’s subrecipient risk assessment? Address any changes in process or indicators between GEER I and GEER II.	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Risk Data and Risk Assessment Improvements	How does the grantee obtain the data needed for its risk assessment process? Has the grantee identified strategies to facilitate the data collection process for risk assessment?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Use of Subrecipient Risk Assessments	How does the grantee utilize the results of its risk assessment(s)?	<i>(Enter brief response here)</i>	

Additional Documentation	For all subtopics, provide any additional documentation that would serve as evidence for the questions asked.	<i>(Enter list of documents here)</i>
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**On-site/Desk Review Questions**

<i>Subtopic</i>	<i>Question</i>	<i>Response</i>
TBD	*** Desk review questions will be derived from the initial review of the self-assessment responses, submitted supporting documentation and other documentation and reports submitted by grantees. ***	

**F. Subrecipient Monitoring**

[Section 442 of the General Education Provisions Act \(GEPA\), 20 U.S.C. 1232e.](#)

Uniform Guidance  
[2 C.F.R. 200.332\(d\), \(e\)](#)  
[2 C.F.R. 200.403-475](#)

[Davis-Bacon and Related Acts](#)

EDGAR  
[34 CFR 76.600](#)  
[34 CFR 75.600-75.618](#)

**Description:** A grantee shall monitor subrecipients and any other entities, including external providers, receiving Federal funds from programs to ensure that all applicable fiscal and programmatic performance goals are achieved and that subawards are used for authorized purposes and in compliance with Federal statutes, regulations, and the terms and conditions of Federal awards.

**Recommended Participants:** GEER Program Director, Program Attorney(s)

**Subtopics:**

- Pre-Monitoring Process
- Monitoring Activities
- Post-Monitoring Process

**Suggested documentation:**

- Subrecipient monitoring handbooks, SOPs, etc. for GEER I and GEER II

- Subrecipient monitoring schedules or monitoring plans for GEER I and GEER II
- Sample subrecipient monitoring protocols for GEER I and GEER II (or a multi-program monitoring protocol if applicable)
- Subrecipient monitoring report for a subrecipient from most recent visit with a monitoring finding
- Documentation of corrective action follow-up activities for subrecipient monitoring findings including both communications with subrecipient and evidence of implementation of corrective action (if available)
- Other documentation that would serve as evidence for the questions asked

### Self-Assessment Questions

<i>Subtopic</i>	<i>Questions</i>	<i>Response</i>	<i>Supporting Documentation</i>
<b>GEER I &amp; II:</b> Pre-Monitoring Process	How does the grantee select subrecipients for monitoring? Does the grantee use its risk assessment process?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Pre-Monitoring Process	How many subrecipients are monitored annually for GEER I and GEER II?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Pre-Monitoring Process	How does the grantee notify subrecipients selected for subrecipient monitoring?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Pre-Monitoring Process	How does the grantee coordinate and train its program staff (and/or contractors) for subrecipient monitoring?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Monitoring Activities	How does the grantee monitor LEA compliance with the requirements of Section 442 of the General Education Provisions Act (GEPA), 20 U.S.C. 1232e.?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Monitoring Activities	What types of <b>program monitoring</b> activities does the grantee engage in to ensure that subrecipients are meeting requirements that program funds are used only for authorized purposes and in compliance with all applicable Federal statutes, regulations, and the terms and conditions of Federal awards?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Monitoring Activities	Describe the process the grantee uses to <b>monitor financial/fiscal requirements.</b>	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Monitoring Activities	How does the SEA monitor compliance with the requirements for construction, remodeling, alterations, renovations, and repairs from Uniform Guidance Cost Principles ( <a href="#">2 C.F.R. 200.403-475</a> ), as well as the Department’s applicable regulations regarding construction at <a href="#">34 CFR 76.600</a> and <a href="#">75.600-75.618</a> and any other applicable statutes or		

	regulations? (See Frequently Asked Questions Elementary and Secondary School Emergency Relief Programs Governor’s Emergency Education Relief Programs, B-6)		
<b>GEER I &amp; II:</b> Monitoring Activities	How does the SEA monitor compliance with the requirement that an LEA record the notice of federal interest in the official real property records for the jurisdiction in which the facility is located as soon as possible but ideally when the LEA receives approval from the SEA to construct or renovate a facility?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Post-Monitoring Process	How does the grantee communicate monitoring results to subrecipients?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Post-Monitoring Process	Describe the process the grantee uses to ensure that subrecipients address and resolve issues identified during subrecipient monitoring (i.e., monitoring follow-up).	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Post-Monitoring Process	How does the SEA follow up with an LEA if there are Davis-Bacon violations or noncompliance with the requirements for construction, remodeling, alterations, renovations, and repairs from Uniform Guidance Cost Principles ( <a href="#">2 C.F.R. 200.403-475</a> ), as well as the Department’s applicable regulations regarding construction at <a href="#">34 CFR 76.600</a> and <a href="#">75.600-75.618</a> and any other applicable statutes or regulations?		
<b>GEER I &amp; II:</b> Post-Monitoring Process	How does the grantee follow up with subrecipients when there is a GEPA issue related to the steps the LEA takes to permit students, teachers, and other program beneficiaries to overcome barriers (including barriers based on gender, race, color, national origin, disability, and age) that impede access to, or participation in, the program?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Post-Monitoring Process	How are monitoring activities finalized prior to the closeout of subrecipient grants?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Post-Monitoring Process	How does the grantee identify and address any issues that repeatedly arise during subrecipient monitoring visits (both for the same subrecipients and across subrecipients), as applicable? Were any improvements made in the implementation of GEER	<i>(Enter brief response here)</i>	

	II as a result of GEER I subrecipient monitoring?		
Additional Documentation	For all subtopics, provide any additional documentation that would serve as evidence for the questions asked.	<i>(Enter list of documents here)</i>	

**On-site/Desk Review Questions**

<i>Subtopic</i>	<i>Question</i>	<i>Response</i>
TBD	*** Desk review questions will be derived from the initial review of the self-assessment responses, submitted supporting documentation and other documentation and reports submitted by grantees. ***	

**G. Equitable Services (as applicable)**

CARES Act  
Section 18005

ESEA  
[Section 1117](#)

EDGAR  
[34 C.F.R. 76.661](#)

**Description:** A local educational agency receiving GEER funds under section 18002 of the CARES Act shall provide equitable services in the same manner as provided under section 1117 of the ESEA to students and teachers in non-public schools, as determined in consultation with representatives of non-public schools.

**Recommended Participants:** GEER Program Director, Program Attorney(s), Program Accountant(s), Equitable Services Ombudsman

**Subtopics:**

- Grantee Oversight of Equitable Services
- Equitable Services Guidance and Support

**Suggested documentation:**

- If appropriate, a copy of the memorandum of understanding, interagency agreement, or other document that formally transfers the administration of GEER I to another State agency.



- Guidance provided to LEAs regarding provision of equitable services
- Samples of any reviews conducted regarding equitable services
- Guidance or sample communications with private schools or private school organizations around the provision of equitable services
- Guidance or sample technical assistance documents provided to private school officials or private school organizations
- Other documentation that would serve as evidence for the questions asked

### Self-Assessment Questions

<b>Subtopic</b>	<b>Questions</b>	<b>Response</b>	<b>Supporting Documentation</b>
<b>GEER I:</b> Applicability of Equitable Services Requirements	Were GEER I funds awarded to LEAs? (If <b>NO</b> , move to next topic section.)	(Yes/No)	
<b>GEER I:</b> Grantee Oversight of Equitable Services	If the grantee is <b>not</b> directly administering GEER I funds awarded to LEAs, which State agency is responsible for such administration?	(Enter brief response here)	
<b>GEER I:</b> Grantee Oversight of Equitable Services	How has the grantee/designated agency ensured that LEAs engaged in timely and meaningful consultation with private school officials?	(Enter brief response here)	
<b>GEER I:</b> Grantee Oversight of Equitable Services	What process (or processes) did the grantee/designated agency use to ensure that LEAs are providing equitable services to private schools in accordance with applicable requirements?	(Enter brief response here)	
<b>GEER I:</b> Grantee Oversight of Equitable Services	How has the grantee/designated agency ensured that LEAs are properly monitoring the distribution and use of equipment and supplies purchased for the purposes of providing equitable services to eligible private schools?	(Enter brief response here)	
<b>GEER I:</b> Grantee Oversight of Equitable Services	What information did an LEA provide to the grantee/designated agency during the subrecipient application process, if applicable, regarding its	(Enter brief response here)	

	plans for providing equitable services using GEER I funds?		
<b>GEER I: Equitable Services Guidance and Support</b>	Did the grantee/designated agency provide guidance to private school officials to enable them to better understand the requirements and process for equitable services and to facilitate the process of consultation with LEAs?	(Enter brief response here)	
Additional Documentation	For all subtopics, provide any additional documentation that would serve as evidence for the questions asked.	(Enter list of documents response here)	

**On-site/Desk Review Questions**

<b>Subtopic</b>	<b>Question</b>	<b>Response</b>
<b>GEER I: Grantee Oversight of Equitable Services</b>	Describe the types of information an LEA provided to the grantee/designated agency during the subrecipient application process regarding its plans for providing equitable services using GEER I funds, as applicable.	

**H. Approved Liquidation Extension Requests**

CARES Act  
Section 18002

CRRSA Act  
Section 312

Uniform Guidance  
[2 CFR § 200.344\(b\)](#)

**Description:** Under [2 CFR § 200.344\(b\)](#), properly obligated funds must be liquidated within 120 calendar days (or by January 28, 2023, for CARES Act funds). The Department has the authority to approve liquidation extension requests for properly obligated funds upon review of a written request made by a grantee on its own behalf or on behalf of its subgrantees. Final approval of a grantee’s written request will be based upon the specific facts and

circumstances, in accordance with [2 CFR § 200.344\(b\)](#). If approved under this process, grantees and subgrantees may have an extension to the liquidation period of up to 14 months beyond the 120 days already available to liquidate funds.

**Recommended Participants:** GEER Program Director, Program Attorney(s), Program Accountant(s)

**Subtopics:**

- Liquidation of Funds
- Liquidation Extension Request Approval
- Drawdown Progress
- Subrecipient Monitoring

**Suggested documentation:**

- G5 drawdown information
- Approved liquidation extension letter
- Liquidation Extension Request submitted by grantee
- Guidance provided to subrecipients regarding need for liquidation extension
- Samples of any collected documentation reflecting timely obligation and allowable uses of funds for liquidation extension inclusion
- Samples of any reviews conducted regarding subrecipient liquidation extension
- Guidance or sample technical assistance documents provided to subrecipients related to liquidation of funds
- Other documentation that would serve as evidence for the questions asked

**Self-Assessment Questions**

Subtopic	Questions	Response	Supporting Documentation
Liquidation of Funds	What is the status of CARES GEER and CRRSA GEER liquidations/drawdown of funds?	<i>(Enter brief response here)</i>	
Liquidation Extension Request Approval	Describe the process of collecting information and documentation from subrecipients included within the State’s Liquidation Extension Request. (If the recipient does not have an extension to the period of liquidation, no further responses are necessary.)	<i>(Enter brief response here)</i>	
Subrecipient Monitoring	How is the grantee monitoring the implementation its approved Late Liquidation Extension Request for	<i>(Enter brief response here)</i>	

	those subrecipients that received an extension to the liquidation period?		
Subrecipient Monitoring	What documentation has been collected from subrecipients included in the grantee's approved Late Liquidation Extension Request related to timely obligation and allowable uses of funds?	<i>(Enter brief response here)</i>	
Subrecipient Monitoring	How does the grantee ensure that LEAs are using late liquidation funds on approved uses and not modifying contracts or budgets in a manner that is not in compliance with the Late Liquidation Extension Request?	<i>(Enter brief response here)</i>	
Subrecipient Monitoring	What technical assistance or support has been provided to subrecipients related to the final liquidation of funds regarding contracts and contracted services included in the Late Liquidation Extension Request?	<i>(Enter brief response here)</i>	
Drawdown Progress	When are the State-level late liquidation funds anticipated to be liquidated? <i>(If there are no State-level funds included, proceed to the next question).</i>	<i>(Enter brief response here)</i>	
Drawdown Progress	When are subrecipient late liquidation funds anticipated to be liquidated?	<i>(Enter brief response here)</i>	
Additional Documentation	For all subtopics, provide any additional documentation that would serve as evidence for the questions asked.	<i>(Enter list of documents here)</i>	

**On-site/Desk Review Questions**

Subtopic	Question	Response
TBD	*** Desk review questions will be derived from the initial review of the self-assessment responses, submitted supporting documentation and other documentation and reports submitted by grantees. ***	