

**State of Rhode Island**  
**Governor's Emergency Education Relief (GEER) Funds**  
**Award Number S425C200028**  
**Initial Report – September 1, 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;

Funds will be awarded throughout FY21.

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;

To make this determination, the Governor's Office has and will continue to consult the Rhode Island Department of Education (RIDE), the state's Office and Management and Budget (OMB), the Department of Administration (DOA), the Office of the Postsecondary Commissioner (OPC), the state's institutions of higher education, local education agencies (LEAs) and PK-12, higher education and early learning stakeholders. Based on their continued input, we are paying specific attention to the public health and economic factors needed to safely continue education at all levels in a pandemic environment, including increased capacity for remote learning and equitable access to education services across the state. As we begin the process of reopening schools for the 2020-2021 school year, GEER funds will be prioritized in a way that ensures the safe and effective continuation of educational services at all levels.

In addition, we have determined that our most vulnerable students, including multilingual learners (MLLs), students with differing abilities, and low-income students were likely to be most negatively impacted by the COVID-19-related closure of schools and disruption in learning. These populations will be prioritized.

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

We intend to utilize both grants and contracts, and will follow a reimbursement model wherever possible.

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

All grant and contract agreements will include specific funding conditions and requirements to ensure the funds are spent for the intended purposes and activities described above.

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.

State agencies utilize a uniform statewide financial accounting system known as RIFANS and must comply with policies and procedures established by the State's Department of Administration, Office of Accounts and Control. Also, a number of other agencies within the Department of Administration including the Office of Purchases and Division of Human Resources issue a variety of policies and procedures regarding their respective areas of control. In addition, state agencies have internal policies, procedures and subsidiary accounting systems that deal with the compliance aspects of the programs they administer, including associated internal controls. Also, the Office of Accounts and Control issues certain other guidelines for the use by State agencies when managing federal programs. These help ensure that funds are recorded in compliance with generally accepted accounting principles for governments and that payments and reimbursement requests are made in a manner that is consistent with federal cash management principles as set forth in the Cash Management Improvement Act and the related agreement between the state and the US Treasury Department.

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.

We do not intend to use GEER funds for this purpose.

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.

Any grant agreement providing funds directly to an LEA will require LEAs to acknowledge that they are required to provide equitable services to students and teachers in non-public schools located within their LEA, consistent with the requirements of the CARES Act.