

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

## A. Budgeting and Subawards

CARES Act  
Section 18002(c)

CRRSA Act  
Section 312(c)

GEER Certification and Agreement

### [Davis-Bacon and Related Acts](#)

EDGAR

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

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

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

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

[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](#)

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

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<sup>1</sup> GEER I refers to GEER funds authorized under the Coronavirus Aid, Relief, and Economic Security (CARES) Act. GEER II refers to funds authorized under the Coronavirus Response and Relief Supplemental Appropriations (CRRSA) Act. 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.

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(s), Program Attorney(s), Program Accountant(s)

Subtopics:

- Budget Preparation
- Support for Development of Subrecipient Program Budgets
- Prior Approval Process and Construction
- Review of subrecipient Program Budgets

Suggested documentation:

- Sample communications with the State regarding how program funds are to be used (including any cost allowability requirements)
- Documented procedures for formation of program budgets (or other descriptions of the process)
- 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 Preparation	During the process of developing program budgets, how were subrecipient-level and/or school-level (if applicable) needs established for GEER?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Budget Preparation	Describe the subrecipient’s process for preparing budgets and planning for the use of GEER funds. Also, identify the individuals responsible for preparing the GEER Fund budget.	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Budget Preparation	If applicable, how did the subrecipient incorporate input from key stakeholders (e.g., school leaders) during the budget preparation process for GEER?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Budget Preparation	How did the subrecipient ensure that proposed uses of funds are for allowable activities and allowable expenditures during the budget preparation process?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Budget Preparation	How did the subrecipient ensure compliance with the requirement that, to the greatest extent	<i>(Enter brief response here)</i>	

	practicable, they continue to compensate their employees and contractors?		
<b>GEER I &amp; II:</b> Support for Development of Subrecipient Program Budgets	What types of guidance or technical assistance did the grantee provide on budgeting and using GEER funds?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Support for Development of Subrecipient Program Budgets	What types of guidance or technical assistance did the grantee provide on prior approval requests from subrecipients?	<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 SEA provide to LEAs 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> Prior Approval Process and Construction	Did the LEA request prior approval for any construction, renovations, and applicable capital improvements projects? If so, what were the projects and the associated costs?	<i>(Yes/No)</i>	
<b>GEER I &amp; II:</b> Prior Approval Process and Construction	If applicable, what was the SEA's process for providing prior approval for construction, renovations, and applicable capital improvements?	<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><i>Subtopic</i></b>	<b><i>Question</i></b>	<b><i>Response</i></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 and subrecipients. ***	

### **B. Award Process**

CARES Act  
Section 18002(c)

CRRSA Act  
Section 312 (c)

EDGAR

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

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

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

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

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

Uniform Guidance

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

**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 Subrecipient Program Director(s), Subrecipient Program Attorney(s), Subrecipient Program Accountant(s)

**Subtopics:**

- Grant Award Notice
- Subaward Application Submission

**Suggested documentation:**

- Documented procedures for completing and submitting subaward information
- 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> Subaward Application Submission	Please describe how you were notified of the opportunity to receive <b>GEER I &amp; II</b> funds.	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Grant Award Notice	Describe how the grantee notified you of the submission process for receiving a <b>GEER I or II</b> subaward. Also, describe the submission process for each.	<i>(Enter brief response here)</i>	

<b>GEER I &amp; II:</b> Subaward Application Submission	Please describe how you received guidance or technical assistance regarding award requirements as a subrecipient.	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Subaward Application Submission	Please describe what information and any application you were required to submit to the grantee for receipt of <b>GEER I &amp; II</b> funds.	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Subaward Application Submission	What type of feedback does the grantee provide once award information is submitted?	<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 and subrecipients. ***	

**C. 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(s), Program Attorney(s)

**Subtopics:**

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

**Suggested documentation:**

- Sample communications from the grantee notifying the subrecipient of planned monitoring activities, including descriptions of monitoring processes
- Sample monitoring report from the grantee notifying the subrecipient of monitoring results
- Corrective Action follow-up activities for monitoring findings included in the report, including both communications with grantee and evidence of corrective action for each finding (if applicable)
- 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> Monitoring Activities	Has the subrecipient participated in monitoring activities for <b>GEER I and/or II</b> ? (If <b>NO</b> , move to next topic section.) If yes, please describe the process.	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Pre-Monitoring Process	How did the grantee notify the subrecipient when it has been selected for monitoring?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Pre-Monitoring Process	How did the grantee communicate expectations to the subrecipient regarding the monitoring process and the requirements covered during reviews?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Pre-Monitoring Process	Describe the types of evidence provided to the grantee by the subrecipient in advance of monitoring.	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Monitoring Activities	How did the grantee monitor subrecipient 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 did 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 used to <b>monitor financial/fiscal requirements</b> .	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Monitoring Activities	How did the grantee monitor to ensure compliance with prior approval and other requirements for construction, renovations, and applicable capital improvements 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?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Monitoring Activities	How did the grantee monitor to ensure that construction activities, including renovations, remodeling, or other applicable capital improvements are necessary for a subrecipient to prevent, prepare for, and respond to COVID-19?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Monitoring Activities	How does the grantee monitor to ensure compliance with the requirement that a subrecipient record the notice of federal interest in the official real property records for the jurisdiction in which the facility is located as soon as it receives the notice of award to construct?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II:</b> Monitoring Activities	If applicable, How did the SEA follow up if there was 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> Monitoring Activities	How did the grantee monitor to ensure compliance with requirements from Davis-Bacon and Related Acts?	<i>(Enter brief response here)</i>	

<b>GEER I &amp; II: Post-Monitoring Process</b>	How were monitoring results communicated to the subrecipient? Did the grantee provide timely feedback to the subrecipient following a monitoring review?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II: Post-Monitoring Process</b>	Did the grantee provide actionable feedback to the subrecipient following a monitoring review?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II: Post-Monitoring Process</b>	How was feedback received as a result of monitoring used to improve implementation and/or ensure compliance?	<i>(Enter brief response here)</i>	
<b>GEER I &amp; II: Post-Monitoring Process</b>	Describe the process by which the grantee followed up on corrective actions required to address issues identified through monitoring (i.e., frequency of grantee communication regarding corrective actions and types of grantee feedback provided).	<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><i>Subtopic</i></b>	<b><i>Question</i></b>	<b><i>Response</i></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. ***	

**D. 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 Subrecipient Program Director(s), Subrecipient Program Attorney(s), Subrecipient Program Accountant(s)

Subtopics:

- Provision of Equitable Services
- Equitable Services Oversight
- Equitable Services Guidance

Suggested documentation:

- Sample documentation of the topics covered during consultation with private school officials (if available). Please include the date when the LEA first engaged in consultation with private school officials and note if consultation is on-going or when that consultation ended
- Sample communications with private schools or private school organizations about the services the LEA will provide
- Samples of communications of allocations with private school organizations for the current school year
- Sample communication with private schools or private school organizations regarding equipment and supplies purchases
- Sample communications with the SEA, if applicable
- Sample journal entries or other documentation showing provision of equitable services under GEER I
- The most recent guidance provided by the grantee related to the provision of GEER I equitable services
- A link to webinars or other presentations

*Self-Assessment Questions*

<i>Subtopic</i>	<i>Questions</i>	<i>Response</i>	<i>Supporting Documentation</i>
<b>GEER I:</b> Provision of Equitable Services	How many private schools were participating in equitable services under GEER I? How does that compare to typical ESEA equitable services (such as Title I, Part A, Title II, etc.)?	<i>(Enter brief response here)</i>	
<b>GEER I:</b> Provision of Equitable Services	Describe the types of services the LEA is providing to private school students and teachers. Briefly describe how the LEA provides equitable services to students attending private schools and private school teachers.	<i>(Enter brief response here)</i>	
<b>GEER I:</b> Provision of Equitable Services	What was the amount and proportion of GEER I funds that the LEA has available to provide equitable services?	<i>(Enter dollar amount and percentage here)</i>	
<b>GEER I:</b> Provision of Equitable Services	How did the LEA determine the amount of funds available for equitable services in each participating non-public school?	<i>(Enter brief response here)</i>	

<b>GEER I: Provision of Equitable Services</b>	How did the LEA provide notice to appropriate private school officials of the amount of funds that would be available for educational services and other benefits under GEER I that the LEA has determined are available for eligible private school children, teachers and other educational personnel, and families?	<i>(Enter brief response here)</i>	
<b>GEER I: Provision of Equitable Services</b>	Describe how the LEA engaged in timely and meaningful consultation with private school officials for equitable services, including the topics discussed during consultation.	<i>(Enter brief response here)</i>	
<b>GEER I: Provision of Equitable Services</b>	Describe the process used to ensure the appropriate title to and use of any equipment or supplies purchased using funds reserved for equitable services.	<i>(Enter brief response here)</i>	
<b>GEER I: Equitable Services Guidance</b>	Did the grantee/designated agency administering GEER I provide assistance to the LEA in calculating the proportional share for providing equitable services?	<i>(Yes/No)</i>	
<b>GEER I: Equitable Services Oversight</b>	Describe the types of evidence that the LEA provided to the grantee/designated agency administering GEER when confirming compliance with equitable service requirements.	<i>(Enter brief response here)</i>	
<b>GEER I: Equitable Services Guidance</b>	What support (for example, guidance) has the grantee/designated agency administering GEER I provided to the LEA regarding equitable services requirements?	<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><i>Subtopic</i></b>	<b><i>Question</i></b>	<b><i>Response</i></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 and subrecipients. ***	

## E. 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
- Subrecipient Monitoring
- Drawdown Progress

### 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
<b>Liquidation of Funds:</b> Liquidation of Funds	What is the status of CARES GEER and CRRSA GEER liquidations/drawdown of funds?	<i>(Enter brief response here)</i>	
<b>Liquidation of Funds:</b> Liquidation Extension Request Approval	If applicable, describe the process of collecting information and documentation to submit to the grantee for inclusion within the State's Liquidation Extension Request.	<i>(Enter brief response here)</i>	
<b>Liquidation of Funds:</b> Subrecipient Monitoring	If applicable, how is the grantee monitoring the subrecipient's implementation of its approved Late Liquidation Extension Request?	<i>(Enter brief response here)</i>	
<b>Liquidation of Funds:</b> Subrecipient Monitoring	If applicable, what documentation has been collected from subrecipients for inclusion in the grantee's approved Late Liquidation Extension Request related to timely obligation and allowable uses of funds?	<i>(Enter brief response here)</i>	
<b>Liquidation of Funds:</b> 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>	
<b>Liquidation of Funds:</b> Subrecipient Monitoring	What technical assistance or support has been provided 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>	
<b>Liquidation of Funds:</b> 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. ***	

