**GEER I, ESSER I, and ESSER II Combined School District Monitoring Form**

**District Name:** Select School District from LIst.

*Updated 1/31/23*

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| **Indicator 1, GEPA** |

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| **Legal References:**  **Certification and Agreement for Funding under the Education Stabilization Fund Program Elementary and Secondary School Emergency Relief Fund CFDA Numbers: 84.425D**  *To the extent applicable, an LEA will include in its local application a description of how the LEA will comply with the requirements of section 427 of GEPA (20 U.S.C. 1228a). The description must include information on the steps the LEA proposes to take 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 equal access to, or participation in, the program.* | **Demonstration of Compliance:**  (a) Written Policy: The district has a written policy that complies with section 427 of GEPA.  (b) Specific Steps: The district’s written policy contains information on the steps the district proposes to take 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 equal access to, or participation in, the program. | **Sample Sources of Evidence:**   * District written policy * Board policy * Policy or procedure manuals * District memos |

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| **District Response, Indicator 1** | **District Attachments, Indicator 1** |
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| **Indicator 2, Non-Public Schools Outreach**  This indicator is not applicable if the district does not have any operational private schools in the district |

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| **Legal References:**    **Section 18005(b) of the CARES Act**    *An LEA that receives funds under the CARES Act programs must provide equitable services to students and teachers in a non-public school in the same manner as provided under section 1117 of the ESEA, as determined in consultation with representatives of non-public schools.* | **Demonstration of Compliance:**  Consultation: The district conducted timely outreach to officials in all non-public schools in the LEA to notify them of the opportunity to obtain equitable services under the CARES Act (ESSER I and GEER I). | **Sample Sources of Evidence:**   * Copies of dated letters and emails sent to non-public schools * Phone logs contacting non-public schools * Public announcements inviting private schools to consult |

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| **District Response, Indicator 2** | **District Attachments, Indicator 2** |
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| **Indicator 3, Equitable Services (Non-Public Schools Participating)**  This indicator is not applicable if the district does not have any operational private schools in the districts, or if the private schools declined participation in COVID funding |

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| **Legal References:**  **Section 18005(b) of the CARES Act**  *An LEA that receives funds under the CARES Act programs must provide equitable services to students and teachers in a non-public school in the same manner as provided under section 1117 of the ESEA, as determined in consultation with representatives of non-public schools.* | **Demonstration of Compliance:**  (a) Allowability: District has established procedures in place to ensure non-public school costs are reasonable, necessary, and allocable to the CARES Act (ESSER I and GEER I).  (b) Secular: Educational services or other benefits to private school students, teachers and parents are secular, neutral and non-ideological.  (c) Public Control of Funds: District has policy documents outlining public control of funds for services and assistance provided to non-public school students and teachers under the CARES Act programs (ESSER I and GEER I). District has policies that declare the district owner of materials, equipment and property purchased with such funds. | **Sample Sources of Evidence:**   * District policies outlining approval processes, public control of funds, and district ownership of items purchased for non-public schools * Inventory lists of items provided to non-public schools indicating district ownership |

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| **District Response, Indicator 3** | **District Attachments, Indicator 3** |
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| **Indicator 4, Continuation of Employee Compensation** |

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| **Legal References:**  **CARES Act, Section 18006**  *An LEA that receives funds under ``Education Stabilization Fund'', shall to the greatest extent practicable, continue to pay its employees and contractors during the period of any disruptions or closures related to coronavirus.* | **Demonstration of Compliance:**  The district continued to compensate their employees and contractors during times of closures due to COVID-19, to the greatest extent practicable. | **Sample Sources of Evidence:**   * District policy or memos indicating continued payment during closures * Union agreements indicating continued payment during closures * Payment logs   **Please redact any personally identifiable information (PII) before sending to DEED.** |

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| **District Response, Indicator 4** | **District Attachments, Indicator 4** |
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| **Indicator 5, Evaluation of Program** |

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| **Legal References:**  **CARES Act, Section 18005** | **Demonstration of Compliance:**  The district measured the effectiveness of programs and activities funded with ESSER I, ESSER II, and GEER I funds and allowed for any needed adjustments. | **Sample Sources of Evidence:**   * Budget revisions * Meeting minutes * District memos * Evaluation data |

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| **District Response, Indicator 5** | **District Attachments, Indicator 5** |
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| **Indicator 6, Unallowable Salaries (ESSER Funds Only)** |

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| **Legal References:**  **Certification and Agreement for Funding under the Education Stabilization Fund Program Elementary and Secondary School Emergency Relief Fund CFDA Numbers: 84.425D**  *The Department generally does not consider the following to be an allowable use of ESSER funds, under any part of 18003: 1) subsidizing or offsetting executive salaries and benefits of individuals who are not employees of the SEA or LEAs or 2) expenditures related to state or local teacher or faculty unions or associations.* | **Demonstration of Compliance:**  (a) Executive Salaries: The district did not utilize ESSER I or ESSER II funds to pay executive salaries and benefits of individuals who are not employees of the district.  (b) Teacher Unions: The district did not utilize ESSER I or ESSER II funds to pay expenditures related to state or local teacher unions or associations. | **Sample Sources of Evidence:**   * District policies * District memos * District payment logs   **Please redact any personally identifiable information (PII) before sending to DEED.** |

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| **District Response, Indicator 6** | **District Attachments, Indicator 6** |
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| **Indicator 7, Executive Salaries (GEER Funds Only)**  This indicator is not applicable if the district did not receive GEER I funds |

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| **Legal References:**  **Certification and Agreement for Funding under the Education Stabilization Fund Program Governor’s Emergency Education Relief Fund CFDA Numbers: 84.425C**  *Generally speaking, the Department does not expect administrative or executive salaries and benefits for IHEs, SEAs, or the other education related entities referenced at § 18002(c)(3) to be a lawful purpose for GEER funds.* | **Demonstration of Compliance:**  The district did not utilize GEER I funds to pay executive salaries. | **Sample Sources of Evidence:**   * Payment logs, with staff titles, for any salaries paid with GEER I funds   **Please redact any personally identifiable information (PII) before sending to DEED.** |

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| **District Response, Indicator 7** | **District Attachments, Indicator 7** |
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| **Indicator 8, Time & Effort** |

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| **Legal References:**  **2 C.F.R. Part 200, Subpart E, §200.430(i)**  *Charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed.* | **Demonstration of Compliance:**  The district charges to federal awards for salaries and wages must be based on records that accurately reflect the work performed. These records must be supported by a system of internal controls which provide reasonable assurance that the charges are accurate, allowable, and properly allocated. | **Sample Sources of Evidence:**   * Written time and effort policies or processes for employees funded with ESSER I, ESSER II, or GEER I funds * Policies and procedures for district’s time and effort system – documentation should include description of the controls designed to ensure accurate, allowable, and allocable personnel charges for COVID grants   **Please redact any personally identifiable information (PII) before sending to DEED. Please do not send specific time and effort records for each employee funded with these funds, but rather provide a broad overview of the district’s systems, policies, and/or procedures.** |

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| **District Response, Indicator 8** | **District Attachments, Indicator 8** |
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| **Indicator 9, Procurement** |

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| **Legal References:**  **2 C.F.R. Part 200, Subpart D, §200.318(a)**  *The non-Federal entity must have and use documented procurement procedures, consistent with State, local, and tribal laws and regulations and the standards of this section, for the acquisition of property or services required under a Federal award or subaward. The non-Federal entity's documented procurement procedures must conform to the procurement standards identified in* [*§§ 200.317*](https://www.ecfr.gov/current/title-2/section-200.317) *through* [*200.327*](https://www.ecfr.gov/current/title-2/section-200.327)*.* | **Demonstration of Compliance:**  The district has documented procurement procedures, which reflect applicable state, local, and tribal laws and regulations, provided that the procurements conform to applicable federal law and the standards identified in this part. | **Sample Sources of Evidence:**   * Procurement manual or other documented procurement procedures * If not included in procurement manual or other documented procurement procedures, written standards of conduct covering conflicts of interest * Documentation of policies and procedures intended to prevent contracting with suspended or debarred parties |

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| **District Response, Indicator 9** | **District Attachments, Indicator 9** |
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| **Indicator 10, Allowable Uses of Funds** |

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| **Legal References:**  **2 C.F.R. Part 200, Subpart D, 200.302;**  **2 C.F.R. Part 200, Subpart E, 200.403-408**  *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 allocable, reasonable and necessary for the accomplishment of program objectives.* | **Demonstration of Compliance:**  The district has written procedures for determining the allowability of costs in accordance with subpart E of the Uniform Grant Guidance and the terms and conditions of the Federal award. An LEA can only use program funds for allowable costs, as defined in the Uniform Administrative Requirements, Cost Principles, and Audit Requirements (2 C.F.R. §200), which include, among other things, the requirement that costs be reasonable and necessary for the accomplishment of program objectives.  **Guiding Questions:**   * During the process of developing program budgets, how were district and school-level needs established for ESSER I, ESSER II, and GEER I? * Describe the LEA’s process for preparing budgets and planning for the use of ESSER I, ESSER II, and GEER I funds. Also, identify the individuals responsible for preparing the budgets. * How did the LEA incorporate input from key stakeholders (e.g., school leaders) during the budget preparation process for ESSER I, ESSER II, and GEER I? * How did the subrecipient ensure that proposed uses of funds are for allowable activities and allowable expenditures during the budget preparation process? | **Sample Sources of Evidence:**   * Written procedures for determining allowability of costs (or other documented descriptions of fiscal controls) * Documented procedures for formation of program budgets (or other descriptions of the process) |

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| **District Response, Indicator 10** | **District Attachments, Indicator 10** |
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| **Indicator 11, Equipment and Supplies Management** |

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| **Legal References:**  **2 C.F.R. Part 200, Subpart D, 200.313-314**  *Equipment must be used by the non-Federal entity in the program or project for which it was acquired as long as needed, whether or not the project or program continues to be supported by the Federal award, and the non-Federal entity must not encumber the property without prior approval of the Federal awarding agency. The Federal awarding agency may require the submission of the applicable common form for equipment. When no longer needed for the original program or project, the equipment may be used in other activities supported by the Federal awarding agency, in accordance with 2 C.F.R. Part 200, Subpart D, 200.313.* | **Demonstration of Compliance:**  The district has procedures for managing equipment (including replacement equipment), whether acquired in whole or in part under a federal award, until disposition takes place.  *Even if an LEA did not purchase equipment with Federal funds, a sample of the most current inventory list (State or other funds) must be provided, unless the LEA has a written policy restricting the use of Federal funds for equipment or electronics.* | **Sample Sources of Evidence:**   * Equipment and Supplies Management manuals, handbooks, SOPs, etc. * Most recent inventory of equipment and supplies purchased with program funds * Policies for managing access and use of equipment and supplies * Policies for conducting physical inventories and reconciliations * Policies for disposition of equipment and supplies purchased using program funds * Documented policies regarding access, storage, and use of technology items purchased using Federal funds |

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| **District Response, Indicator 11** | **District Attachments, Indicator 11** |
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| **Indicator 12, Construction, Capital Projects, & Capital Equipment**  This indicator is not applicable if the district did not have expenses in object codes 500, 510, or 540 for ESSER I, ESSER II, or GEER I funds. |

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| **Legal References:**  **2 C.F.R. Part 200, Subpart E, 200.407**  **34 C.F.R. 76.600 and 75.600-75.618**  **20 U.S.C. 1232b Labor Standards** | **Demonstration of Compliance:**  (a) Management Procedures: The district has procedures for managing construction, capital projects, or capital equipment funded (in whole or in part) with ESSER I, ESSER II, or GEER I funds.  (b) Prior Approval: The district has procedures for receiving prior written approval from DEED (through GMS application or email) for equipment and other capital expenditures funded with ESSER I, ESSER II, or GEER I.  (c) Davis Bacon: For minor remodeling, renovation, repair, or construction contracts (funded with ESSER I, ESSER II, or GEER I) over $2,000, the district has policies and procedures in place to meet all Davis-Bacon prevailing wage requirements. | **Sample Sources of Evidence:**   * Capital project management manuals, handbooks, SOPs, etc. * Most recent list of capital projects funded with ESSER I, ESSER II, or GEER I * Policies for managing capital projects funded with federal funds * Policies for conducting physical inspections and reconciliations of capital projects * Policies for disposition of capital equipment * Documented policies regarding access, storage, and use of capital equipment (vehicles, technology servers, etc.) * Construction contracts that specify all contractors or subcontractors must pay wages that are not less than those established for the locality of the project (prevailing wage rates) |

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| **District Response, Indicator 12** | **District Attachments, Indicator 12** |
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| **Indicator 13, Timely Reimbursement Requests** |

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| **Legal References:**  **2 C.F.R. Part 200, Subpart D** | **Demonstration of Compliance:**  The district has a procedure in place to ensure timely submittal of quarterly reimbursement requests. | **Sample Sources of Evidence:**   * History logs of reimbursement requests * Policy or procedure documents * Fiscal handbooks |

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| **District Response, Indicator 13** | **District Attachments, Indicator 13** |
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