

GEER RFP Guidance

Questions are organized by topic, below, and continuously numbered. This document will be updated as questions are received by applicants.

Eligibility

1. What makes a program's services "new, unique, or additional"?

As part of the CARES Act, GEER funds are intended to help the state respond to the coronavirus. That means that uses of the funds should be limited to programs and expenses that would not have occurred but for the pandemic. Programs that existed before March 13, 2020, serving the same children, with the same model or features do not count as "new," "unique," or "additional." More guidance on each of these terms is below.

- A "new" program is one that an organization started after March 13, 2020, to respond to the needs of their community that arose from the pandemic. New programs did not exist at the organization prior to March 13, 2020.
- A "unique" program is one that is substantially different than a program that the organization operated prior to March 13, 2020. This may be because the program has altered its model to meet the needs of the pandemic or otherwise distinguished the program.
- "Additional" services are those services that represent an expansion of the organization's existing offerings as of March 13, 2020. Such an expansion may include adding program seats to an existing childcare program in order to fill new needs in the community or extending the program to serve new age groups or specific types of children most affected by the pandemic.

In addition to the program offering new, unique, or additional services after March 13, 2020, it must also not already be supported through CARES funds or another source. The Governor intends for GEER funds to fill unmet needs. Newly created programs, for example, that are already being paid for by CARES are not "new" according to GEER. Programs must meet both of these tests—that they represent a post-March 13 change and that they had no other source of funding—in order to be considered new, unique, or additional.

2. If a program started in July or August using tuition, does it qualify for GEER?

It depends. If the program meets the "new, unique, or additional" services test, the program may qualify for GEER if it ceases to collect tuition from program recipients as of the program's GEER start date. The program may not collect tuition for the same services and the same hours that are funded by GEER. If the program intends to add-on to the GEER program—such as for "after care" for a

part-time or school-day program—the program may charge tuition for these additional hours. The program may also have some tuition-funded participants as well as some GEER-funded recipients; however, the GEER-funded recipients may not be charged any difference between tuition and the GEER grant for the duration of the official GEER program.

3. What does “continue to pay employees and contractors to the greatest extent practicable” mean?

One of the purposes of the GEER Fund is to enable education-related organizations to maintain jobs throughout the pandemic and to support these organizations’ ongoing functionality. GEER Fund recipients should not stop paying employees or contractors during time periods in which GEER programming is disrupted or facilities are closed due to the coronavirus, if at all possible.

4. If my organization is a for-profit company that is not a childcare center or a school but specializes in education-related equipment, products, or other services, do I qualify for any Priority Task?

The Notice Announcing Availability of Funds from the US Secretary of Education states, “A Governor may...award funds to any...LEA, IHE, or education-related entity within the State that the Governor deems essential to carry out emergency educational services to students, provide childcare and early childhood education, provide social and emotional support, and protect education-related jobs.” Under the Secretary of Education’s GEER guidance, she further clarifies that education-related entities—including for-profit entities—must support preschool, elementary, secondary, or higher education. This specifically includes for-profit schools and for-profit childcare centers. If the company qualifies for, and is willing to undergo, the expedited review process to become a childcare center, it would qualify to apply for Priority 1.1 or 2.1. Otherwise, the company should partner with a qualifying entity in order to participate in Priority 1.2 or 2.2.

5. My organization is not already licensed as a childcare provider by the Mississippi State Department of Health. What is an “expedited review process for temporary licensure or temporary registration,” and how do I qualify?

Due to the needs of the pandemic, the Mississippi Department of Human Services, working in conjunction with the Mississippi Department of Health, has created an expedited process for new applicants to achieve licensure and thus become eligible for GEER funds. The process is based on the CCAIR (Childcare Crisis Assistance in Isolation Response) process developed by the Department of Human Services and State Department of Health earlier this year. It will require organizations to meet basic licensure standards in order to receive their temporary license or registration.

In order to qualify for this expedited process, the applicant must be eligible according to the Licensure Form and then complete the required steps. *ONLY* GEER-funded programs are eligible to receive licensure under this expedited process.

6. My organization received full childcare or DMH certification/licensure after September 1, 2020, but before the application deadline. Can I apply for Priority 1.1, 2.1, or 2.2, as relevant, if I intend to serve an eligible population?

If you receive full certification before the application deadline, please apply. We will handle cases such as these on a case-by-case basis. Please note, however, that no extensions of the deadline will be granted for this or any reason.

7. Under Priority Task 1.1, 2.1, and 2.2, eligibility refers to children in foster care “and/or whose parents...” or “and/or who meet...” What does the “and/or” mean?

Children in foster care are eligible to be served under Priority Tasks 1.1, 2.1, and 2.2. These children must *additionally* meet, or have foster care parents who meet, one of the bulleted criteria. This is the “and” part of the “and/or.”

Children not in foster care are eligible to be served under Priority Tasks 1.1, 2.1, and 2.2. These children are only required to meet, or have parents who meet, one of the bulleted criteria. This is the “or” part of the “and/or.”

Equitable Services

8. Do LEAs responding to this RFP have to provide “equitable services”?

Unless and until the guidance from the US Department of Education is overturned, LEAs must initiate the consultation process with non-public schools prior to applying for GEER. If non-public schools decline to participate in consultation or in the GEER program more generally, LEAs do not have to provide equitable services.

Timeline

9. If the program start date is later than October 12, 2020, may the program calendar extend past February 5, 2021?

Yes. GEER funds may be spent until June 2, 2021. However, the Governor wants funds to meet immediate needs during the ongoing pandemic. Once the pandemic wanes, the need for GEER programs will also decline. If the pandemic continues into 2021, and GEER funding is increased by Congress, the Governor may choose to extend programs.

Funding

10. The federal government has approved an indirect cost rate higher than 15% for my organization. Can I use this higher number?

No. The GEER Fund regulations provide the Governor with the ability to cap administrative costs chargeable to the grant by awarded organizations. The Governor has chosen to do so at 15%.

11. If we apply under Priority 2.1 but ultimately serve a child eligible under Priority 2.2, are we eligible for the higher grant rate for that child?

Yes, with conditions. Your application must reflect the grant rate for Priority 2.1, but if your application is accepted for funding, and if you serve a child eligible for 2.2 in your 2.1 program, GEER will fund at the higher rate for that child *as funds allow*.

General

12. If I am a qualifying entity but have an idea or program that does not fit in one of the Priority Tasks, how can I apply for GEER funds?

You should not apply under this RFP if your idea or program does not fit in one of the Priority Tasks. If your idea can be described as an “Innovative Educational Solution,” you may be eligible to apply for the second RFP, to be released soon. If you nonetheless apply under a Priority Task unrelated to your idea, your application will be marked as ineligible in the very first stage of the review process.

13. How should an organization responding to Priority Task 1.1, 2.1, or 2.2 determine if a student’s parents meet any of the eligibility criteria?

The Governor requires a reasonable assurance from the organization that a student in a GEER-funded program is eligible. There are no hard-and-fast rules as to what documentation an organization must require. The organization should use its application process to make this determination and balance the need for accuracy with the burden of documentation requested from parents affected by the pandemic. Organizations are allowed to have parents sign an assurance as to their eligibility in addition to any other documentation requested.

14. Does a child have to have an IEP or 504 plan reflecting a qualifying diagnosed disability in order to participate in a 2.2 program? What if my entity accepts children based on parent interest and diagnoses them later?

A child must have a qualifying diagnosed disability reflected on an IEP or 504 plan prior to September 1, 2020. Children who are diagnosed later through the entity’s offering are not eligible at this time for Priority 2.2. Such a child may be served in a Priority 2.1 program but would not qualify for the higher rate, even if funds allow.

15. Can an entity apply for both the current RFP (Essential Emergency Educational Solutions) and the forthcoming RFP (Innovative Educational Solutions)?

Yes, if the two applications propose different activities or programs. The second RFP is not yet finalized, but a funded entity under the first RFP will not be considered for additional funding under the second RFP for the same activities or programs.