

# **CARES Act - Governor's Emergency Education Relief (GEER) Fund for Ohio Higher Ed Mental Health Support**

**84.425C GEER-ODHE**

## **Guidance & Frequently Asked Questions**

**Funding Period:**

**March 13, 2020 – June 30, 2022**

**US Department of Education passed through the  
Ohio Department of Higher Education**

**CFDA # 84.425C**

*NOTE: As U.S. Department of Education issues future guidance and clarifications, the specific guidelines listed in this document are subject to change. Changes may be addendums to this document in the Frequently Asked Questions section.*

The purpose of this document is to provide guidance to Ohio's higher education institutions (institutions) receiving Governor's Emergency Education Relief (GEER) Funds through the Ohio Department of Higher Education (ODHE) per the ODHE allocation of federal funds.

## Funding Information

The GEER funds were awarded to the State of Ohio under the Coronavirus Aid, Relief, and Economic Security Act ("CARES Act") section 18002. The US Department of Education (USDE) suggested that GEER funds be used for student services that promote a student's emotional and physical well-being outside the context of the formal instructional program. On September 28, 2020, The Office of Budget and Management requested Controlling Board approval to establish appropriation authority for the Departments of Mental Health and Addiction Services, Higher Education, and Education in FY 2021. The request allowed the agencies to use federal funds made available from the Federal Coronavirus Relief Fund and the Governor's Emergency Education Relief Fund under the CARES Act, to support a coordinated approach to respond to the behavioral health impacts of the COVID-19 pandemic. Under the direction of Governor DeWine, the state has been working across multiple agencies to support Ohio's response to the COVID-19 pandemic.

The CARES Act funds are being coordinated to establish a comprehensive, statewide behavioral health strategy across Ohio elementary, secondary, and higher education institutions and in our local communities.

### Governor's Emergency Education Relief - Higher Education Mental Health

The requested \$8.5 million will be appropriated from the Governor's Emergency Education Relief Fund and will be utilized by the Ohio Department of Higher Education for longer-term support and capacity development, connection to community resources, and implementation of behavioral health supports in response to the COVID-19 pandemic. Funds will be disbursed to Ohio's higher education institutions to address mental health needs on campuses across the state during January - June 2021. Funds are critically needed to support rise in demand for mental health and counseling support services for students enrolled in Ohio's public universities, community colleges, and non-profit higher education.

## Federal Assistance Information

- Grant Name/Project Description: Governors Emergency Education Relief Fund
- CFDA: 84.425C
- Program Title: Education Stabilization Fund
- FAIN: S425C200040
- Awarding Agency: US Department of Education passed through the Ohio Department of Higher Education
- Regulations: EDGAR as applicable, 2 CFR as applicable
- Federal Award Date: 6/2/2020
- Subaward Period of Performance Start Date: 3/13/2020
- Subaward Period of Performance End Date: 6/30/2022

## Performance Period

The U.S. Department of Education has determined that a Governor or an eligible entity may use GEER funds for any allowable expenditure incurred on or after March 13, 2020, the date the

President declared the national emergency due to COVID-19 through September 30, 2022 which includes the Tydings period (General Education Provisions Act §421(b)(1)). However, the GEER Fund is an emergency appropriation to address the harm to students and the ongoing functionality of LEAs and IHEs caused by COVID-19. As a result, the USDE Secretary strongly urges LEAs, IHEs and education-related entities to deploy GEER funds quickly.

As this is a reimbursement grant, there should not be cash on hand. However, if there is, any cash on hand that was not spent must be returned to ODHE so that ODHE can return the funds to the USDE. Returns of grant funds must be sent to the Ohio Department of Higher Education and postmarked no later than October 15, 2022.

The time period between June 30, 2022 and September 30, 2022 may only be used as a liquidation or account reconciliation period. This period is strictly to finalize payments for performance and delivery of goods and/or services that occurred prior to June 30, 2022 and/or make accounting adjustments for eligible activity that was paid prior to September 30, 2022. Failure to provide the final report in a timely manner could result in the final payment not being made or a refund due of awarded funds.

## Use of Funds

### General Eligibility Information

The CARES Act requires that the payments from the GEER fund be used to cover expenses that –

- A. Provide emergency support through grants to the LEAs that the State educational agency (SEA) deems to have been most significantly impacted by COVID-19 to support the ability of such LEAs to continue to provide educational services to public and non-public school students and to support the on-going functionality of the LEA;
- B. Provide emergency support through grants to IHEs serving students within the State that the Governor determines have been most significantly impacted by COVID-19 to support the ability of such institutions to continue to provide educational services and support the ongoing functionality of the institution; and
- C. Provide support to any other IHE, LEA, or education-related entity within the State that the Governor deems essential for carrying out emergency educational services to students for authorized activities described in section 18003(d)(1) of the CARES Act or the Higher Education Act of 1965, as amended (HEA), the provision of childcare and early childhood education, social and emotional support, and the protection of education-related jobs.

The GEER funds are subject to the Uniform Guidance, which in general requires that grant expenses are reasonable, allocable and necessary to accomplish the goals of the federal program. In this case, **necessary** means expenditures were required because of the public health emergency with respect to COVID-19. (As stated in the USDE FAQ, the GEER Fund is an emergency appropriation to address the harm to students and the ongoing functionality of LEAs and IHEs caused by COVID-19.)

## ODHE – Higher Ed Mental Health Support

ODHE is awarding GEER grants specifically for mental health support for public universities, public community colleges and independent not-for-profit colleges and universities that were included in the ODHE allocation. **The Mental Health Support CRF shall be used to support immediate behavioral health response and recovery needs related to the COVID-19 pandemic on Ohio college and university campuses.** Funds will be disbursed to Ohio's higher education institutions to support the rise in demand for mental health and counseling support services for students on campuses across the state.

When determining the best use of these funds, please consider activities that:

- 1) increase knowledge and awareness of care options,
- 2) increase access to and availability of care options, and/or
- 3) remove barriers to care options.

Ideas such as expansion of telehealth options to provide greater service coverage and continuity of care, increased awareness of phone and text care line services, and expansion of certified peer educator programs should be considered, among other options.

When determining eligibility to distribute GEER funds it received, an institution should evaluate all proposed expenditures based on guidance contained within the U.S. Department of Education Guidance and Frequently Asked Questions which can be found at <https://oese.ed.gov/offices/education-stabilization-fund/governors-emergency-education-relief-fund/>

If an institution has any questions regarding the eligibility of a cost, please contact ODHE via e-mail at [OdheFiscalReports@highered.ohio.gov](mailto:OdheFiscalReports@highered.ohio.gov) ODHE cannot make determinations about the expenditures that an institution may deem necessary to respond to COVID-19, but can provide guidance regarding eligibility.

## Application Process

ODHE prepared a funding allocation and institutions of higher education listed in that funding allocation may apply for a grant award up to that allocation amount. Institutions must apply on the Ohio Grants Partnership website at <https://grants.ohio.gov/> In order to apply, an institution must have a valid DUNS number and SAM registration. The System for Award Management (SAM) is an official website of the US Government found at <https://www.sam.gov/>.

ODHE will review the grant application/registration and assess subrecipient risk. Once the application/registration is approved, the grants contact listed on the application will be e-mailed login credentials to access the Ohio Grants Portal where institutions will upload their budget spreadsheet. ODHE will review the budget and if the subgrant is approved, ODHE will email a Grant Award Notification (GAN) document and invoice/cash request form to the institution.

## Requesting Funds

Grant payments will be made on a reimbursement basis. Payments under this award will be made via EFT through the Ohio Department of Higher Education HEI subsidy payment system for those institutions in the system. For those not in the system, payments will be processed as regular State of Ohio voucher.

After allowable expenses have been incurred, the subgrantee should request reimbursement by completing the ODHE GEER Reimbursement/Cash Request form and e-mailing the form to the ODHE Fiscal Office at [invoices@highered.ohio.gov](mailto:invoices@highered.ohio.gov) no more than monthly.

## Reporting

Reporting will be done in the Ohio Grants portal. The grant contact named in the portal is the individual responsible for completing reports on behalf of the entity and is the one with access to the portal. The grants contact is established at the time of registration/application. At approval of the registration/application, an e-mail was sent with log-in information. Please refer to the Ohio Grants Portal “Reporting Job Aid”, for instructions on entering expenditure reports in the portal. Entities requiring assistance with access should e-mail the Ohio Grants Partnership at [grants@obm.ohio.gov](mailto:grants@obm.ohio.gov).

**The 10 percent rule** - The portal reporting must align with your institution’s approved budget. Grantees may report up to 10 percent more than that approved in the most current budget by category. For example, under category salaries, the total amount approved for salaries is \$1,000. If your actual expenses exceed the approved budgeted amount, the amount reported on the interim/final report could reflect up to 10 percent more, resulting in a total of \$1,100 for salaries. If you anticipate the budget will vary by more than 10 percent in a category, please send a revised budget to ODHE at: [OdheFiscalReports@highered.ohio.gov](mailto:OdheFiscalReports@highered.ohio.gov)

If your institution’s grant expenses include direct student financial assistance, when reporting on the use of funds in the Ohio Grants Portal, per USDE reporting requirements you will be specifically asked to enter the following:

- ❖ Amount of expended funds used by the IHE to provide student financial aid grants, and
- ❖ Number students who received financial aid grants as result of GEER funds.

At this time, ODHE is requiring an interim and a final financial and performance report.

- The first interim report is due September 30, 2021 for activity through June 30, 2021.
- A final close-out report is due September 30, 2022 for activity from July 1, 2021 through June 30, 2022. Liquidation activities should be completed by September 30, 2022. Any cash on hand reported on this report must be returned to ODHE no later than October 15, 2022.

Additional reports may be required. Notification of these dates, if any, will be announced as additional guidance is issued by the U.S. Department of Education.

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As this is a reimbursement grant, there should not be cash on hand. However, if there is, any cash on hand that was not spent must be returned to ODHE so that ODHE can return the funds to the USDE. Returns of grant funds **must be sent to the Ohio Department of Higher**

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**Education and postmarked no later than October 15, 2022.** Returns can be made via check payable to the Treasurer of the State of Ohio and mailed to:

Ohio Department of Higher Education  
ATTN: Fiscal Department, GEER Mental Health Grant Refund  
25 South Front Street, 2<sup>nd</sup> Floor  
Columbus, Ohio 43215

**Performance Reporting** – In addition to financial information, campuses will be required to answer the following questions as part of the interim and final reports in the Ohio Grants Portal:

- Please describe the process used to identify how the funds would be spent to support immediate behavioral response and recovery needs related to COVID-19.
- What specific outcomes or goals were developed to guide the use of these funds.
- Please provide a detailed list of the work completed, estimated number of students who benefited, and the funds used to achieve each outcome or goal. If outcome or goal was not achieved please provide an explanation, along with the detailed information requested (i.e. work completed, number of students attempted to reach, and funds use).
- Please identify any of the work completed with the grant funds and how it will inform or direct on-going efforts on the campus.

#### **Responsibilities, Records, & Future Audits**

All GEER Reimbursement/Cash Requests and interim/final expenditure reports are subject to review and reported expenditures must be supported with sufficient evidential documentation (invoices, timesheets, payroll ledgers, proof of payment etc.). **Grantees must submit documentation upon request by the Department. Expenditures without proper support documentation are unallowable.**

The GEER award is subject to future audits to ensure appropriate use with ultimate recoupment by USDE. Records must be made available to ODHE, the Ohio Auditor of State, Independent Public Auditors that perform audits on behalf of Ohio Auditor of State, the federal government, and/or other oversight entities for audit or review. Records shall be maintained and audited in accordance with the Uniform Guidance.

The GEER award is subject to the single audit requirements in 2 C.F.R. 200.501. **Single Audit Reports should be submitted to [OdheFiscalReports@highered.ohio.gov](mailto:OdheFiscalReports@highered.ohio.gov) as soon as possible following completion of the audit.**

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## Frequently Asked Questions

*NOTE: That this information is provided as a reference and is current as of February 17, 2021. In the event of a conflict between this document and state law, federal law, or USDE guidance, the state and federal laws and guidance supersede this document. This document may be updated if the USDE provides future clarifications.*

### **How should the GEER mental health support funds be used?**

The Mental Health Support CRF shall be used to support immediate behavioral health response and recovery needs related to the COVID-19 pandemic on Ohio college and university campuses.

Each Ohio campus is unique, with its own diverse student population. A one-size-fits-all approach from the state is not the best way to address this complex issue. You and your teams are in the best position to identify the specific and acute needs of your campus community. Therefore, we strongly encourage you to convene a multi-disciplinary team to discuss how your allocation will be used. It is suggested that your campus look to fill that team with representatives from multiple offices who work with different communities on your campus. We encourage the involvement of persons from student success, diversity and inclusion, gender equity and women's resource centers, residence life, international programs, counseling centers, and more. We strongly encourage you to also include a representative from your community mental health board, as well as students.

When determining the best use of these funds, please consider activities that 1) increase knowledge and awareness of care options, 2) increase access to and availability of care options, and/or 3) remove barriers to care options. Ideas such as expansion of telehealth options to provide greater service coverage and continuity of care, increased awareness of phone and text care line services, and expansion of certified peer educator programs should be considered, among other options.

The GEER funds are subject to the Uniform Guidance, which in general requires that grant expenses are reasonable, allocable and necessary to accomplish the goals of the federal program. In this case, **necessary** means expenditures were required because of the public health emergency with respect to COVID-19. (As stated in the USDE FAQ, the GEER Fund is an emergency appropriation to address the harm to students and the ongoing functionality of LEAs and IHEs caused by COVID-19.)

### **Can GEER Funds be used to address food insecurity through the purchase of food and other supplies for campus food pantries?**

No, GEER funds should not be used to address food insecurity through the purchase of food and other supplies for campus food pantries. Coronavirus Relief Funds (CRF) has a "Food Programs" category to address food insecurity; therefore, we encourage campuses to support their campus food pantries and other food insecurity matters through those funds. In addition, Congress has recently authorized new flexibilities in SNAP law that grant access to the program

for many students who were previously excluded<sup>1</sup>. Students who are enrolled half-time or more and who:

- (a) are “**eligible** to participate in a State or federally financed work study program during the regular school year as determined by the institution of higher education,” (previously students had to be actively **participating** in work study to qualify) or
- (b) in the current academic year, have an expected family contribution of \$0 as determined in accordance with part F of title IV of the Higher Education Act of 19[6]5 (20 U.S.C. 1087kk et. seq.).<sup>2</sup>

Additional information will be sent to the Chief Financial Aid Officer, Chief Student Affairs Officer, and President for each campus around the start of March.

### **Can GEER Mental Health Funds be used to purchase gift cards or other incentives?**

No, Federal guidelines only allow funds to be designated for incentives in very limited circumstances. Gift cards, in particular, are difficult to audit and can be used for non-mental health related items. Therefore, the use of gift cards, or other incentives, to encourage participation in campus programs, training, or other similar activities falls outside the intent behind the funding.

### **May a subgrantee use GEER mental health funds for indirect costs?**

Yes. The subgrantee may charge as an expense to the GEER Fund an amount that is reasonable and necessary to effectively administer the program consistent with cost principles in 2 C.F.R. part 200, subpart E of the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance). **However, to maximize the funds available for services to students and the public, the USDE encourages each Governor and subgrantee to minimize the amount of administrative costs charged to the program.**

### **What is the difference between the Authorized Representative and the Grant Contact?**

ODHE is collecting information from institutions receiving funds to allow for future administration and monitoring. The Authorized Representative is the main executive within the institution that can authorize acceptance of the funds on behalf of the institution. The grant contact will be the main person ODHE will reach out to for monitoring, obtaining resolutions, or other questions regarding the funds. This contact will be responsible for completing the reporting in the OBM grants portal on behalf of the institution. Institutions can enter the same person for both contacts if applicable.

### **How do I access the OBM grants portal after receiving a log-in?**

The grants portal can be accessed at <https://applicationgateway.obm.ohio.gov/Account/Login.aspx>

<sup>1</sup> “Consolidated Appropriations Act, 2021,” Pub. L. No. 116–260 (2020), Sec. 702(e), <https://www.congress.gov/bill/116th-congress/house-bill/133/text/enr>.

<sup>2</sup> The general federal student exclusion from SNAP does not apply to college students enrolled less than half-time. A student’s EFC is calculated from the information supplied on their FAFSA.

### What if I'm having trouble logging in or submitting a report?

Below are some common issues and solutions:

- If you are not able to log into the reporting portal, please ensure you are the Grant Contact and not the Authorized Representative. Currently, only the Grant Contact has access to the portal. If you would like the roles changed, please email the Ohio Grants Partnership at [Grants@obm.ohio.gov](mailto:Grants@obm.ohio.gov) and request the change.
- It is suggested that only web browsers Chrome and Edge are used to access the reporting portal.
- Ensure pop up blockers are turned off.
- Go to <https://applicationgateway.obm.ohio.gov/Account/Login.aspx>
- Enter (control+F5) to refresh your cache when you're at the login screen

### In addition to the CARES Act GEER Fund, should my institution setup a separate fund to account for other CARES Act and federal COVID-19 financial assistance?

Institutions should refer to the terms and conditions of their federal award. Generally, federal programs with new or expanded COVID-19 assistance require separate accountability and institutions will need to establish either a Special Revenue Fund (for a new program) or a subfund/special cost center (for expanded assistance within an existing federal program) to separately track the receipt and expenditure activity of the COVID-19 funding.

### Are these funds allowed to be used as cost-share or match to other federal grant programs?

No, these funds may not be used to fill revenue shortfalls or as a match for other federal programs and funds should supplement, and not supplant, local, state or federal funds that have also been appropriated for the same purpose.

### How long should institutions retain records relating to the CRF and supporting expenditures?

Records shall be maintained for a period of three (3) years following completion of the activities for which the subgrantee uses the federal or state funding, in accordance with the Uniform Guidance 2 CFR 200.334.

### Who is my grant contact for questions or concerns?

ODHE is available to answer any questions or concerns that you may have via e-mail at [OdheFiscalReports@highered.ohio.gov](mailto:OdheFiscalReports@highered.ohio.gov) For questions related to log-in or issues with the portal, please e-mail OBM at [grants@obm.ohio.gov](mailto:grants@obm.ohio.gov).

### Helpful Resources:

USDE GEER website: <https://oese.ed.gov/offices/education-stabilization-fund/governors-emergency-education-relief-fund/>

Ohio Grants Partnership - <https://grants.ohio.gov/forstateagencies.aspx#state-agencies-resources-manuals-training>

Federal System for Award Management - <https://beta.sam.gov/>

Ohio Auditor of State - [https://www.ohioauditor.gov/resources/COVID19\\_assistance.html](https://www.ohioauditor.gov/resources/COVID19_assistance.html)