

Governor's Emergency Education Relief II

Support for Nonpublic Schools (GEER II SNS)

Frequently Asked Questions

Published September 2023
Updated February 2024

The Ohio Department of Education (The Department) GEER II SNS Frequently Asked Questions document is intended to answer questions that Ohio's nonpublic stakeholders may have regarding the Governor's Emergency Education Relief Support for Nonpublic Schools (GEER II SNS) program. This document will be edited as new information becomes available. If you have questions regarding the GEER II SNS program, contact EANS@education.ohio.gov.

What is the Governor's Emergency Education Relief II (GEER II SNS) program?

The Governor's Emergency Education Relief II Support for Nonpublic Schools (GEER II SNS) program is a program under the Governor's Emergency Education Relief II (GEER II) fund designed to serve nonpublic schools in response to COVID-19. The GEER II program is authorized through the Coronavirus Response and Relief Supplemental Appropriations (CRRSA) Act, 2021, Pub. L. No. 116-260 (December 27, 2020). Under the GEER II SNS program, the Department contracts with Education Service Centers (ESCs) to provide services to nonpublic schools in response to the COVID-19 pandemic.

How much funding did Ohio receive for the GEER II SNS program?

Ohio will provide \$26,192,54 to eligible nonpublic schools in Ohio. The Ohio Department of Education is responsible for the administration of the GEER II SNS program.

Which nonpublic schools are eligible to apply for services or assistance under the GEER II SNS program?

For purposes of the GEER II SNS program, an eligible nonpublic school is an elementary or secondary school that—

- Is non-profit (see the definition [here](#)).
- Is accredited, licensed, or otherwise operates in accordance with State law;
- Was not eligible for the Emergency Assistance to Nonpublic Schools (EANS) program due to receiving a PPP loan on or after December 27, 2020, as well as nonpublic schools that were not eligible for ARP because GEER II SNS because of the poverty threshold requirements.
- Nonpublic schools that received an EANS or ARP EANS service amount are eligible to apply for this GEER II SNS program but must demonstrate additional needs beyond the service amounts received under EANS.

Are faith-based nonpublic schools eligible to participate in the GEER II SNS program?

Yes. Faith-based nonpublic schools are eligible to participate in the GEER II SNS program to the same extent as other eligible nonpublic schools. All services or assistance provided under the program must be secular, neutral, and non-ideological.

Are faith-based curricula allowable under the GEER II SNS program? (Added February 2024)

No. Services under GEER II SNS must be secular and non-ideological. Faith-based curricula are not allowable under this program.

Is a nonpublic school that serves only preschool children eligible to receive services or assistance under the GEER II SNS program?

Not generally. Under the GEER II SNS program, in pertinent part, an eligible “nonpublic school” is a nonpublic elementary school that (A) is accredited, licensed, or otherwise operates in accordance with State law. (Section 316(6) of the CRRSA Act). Under section 8101(19) of the ESEA, incorporated by section 316(8) of the CRRSA Act, an elementary school is a school that provides elementary education, as determined under State law. Therefore, only nonpublic schools that provide elementary (or secondary) education are eligible for services or assistance under the GEER II SNS program. Preschool children who are enrolled in a nonpublic elementary school that receives GEER II SNS services may be served. However, a stand-alone nonpublic preschool is not eligible for services or assistance under the GEER II SNS program.

What steps did the State of Ohio and the Department take to ensure a consistent and accurate process for determining the eligible schools for GEER II SNS?

Ohio took a number of steps to ensure a consistent and accurate process for determining the eligible schools for GEER II SNS. The Department provided emails to allow as many schools as possible to demonstrate eligibility for GEER II SNS. The Department set up internal controls to review GEER II SNS data, including verifications with the Office of Federal Programs Data Manager and Management Analyst. These internal controls ensured that if more reliable data became available through our data verification process, the Department could create an accurate list of eligible schools as described above. Additional information about our GEER II SNS eligibility determination process can be found in [CCIP Note 533](#) and [CCIP Note 534](#).

Did a nonpublic school need to apply to receive services under GEER II SNS?

Yes. The Department sent nonpublic applications for the GEER II SNS program to eligible schools. The deadline to submit the GEER II SNS application was September 6, 2023. Eligible nonpublic schools needed to apply to receive a Final Service Amount.

What happens if a nonpublic school did not apply for GEER II SNS services or assistance?

Schools must apply for GEER II SNS to receive a GEER II SNS Final Service Amount. Schools that did not apply for GEER II SNS will not receive GEER II SNS services or assistance.

How did the Ohio Department of Education determine the amount of services and assistance that each nonpublic will receive through the GEER II SNS Program? (Updated September 21, 2023)

For GEER II SNS, the Department used a weighted approach to determine GEER II SNS service amounts based on total enrollment, poverty, requested amount on the application, eligibility due to PPP, eligibility for ARP EANS, and impact of COVID-19 data. Under the GEER II SNS program, nonpublic schools are not considered direct recipients of federal funds. Nonpublic schools that apply and are selected will receive a service amount. Services will be provided by Educational Service Centers (ESCs). The Department sought input from the participating schools regarding their preferences for ESC service providers, and the Department contracted with the ESCs who are interested in serving in this capacity. The contracted ESCs will provide services in the amount of the GEER II SNS service amount for each school.

If a nonpublic school is receiving equitable services under a CARES Act program, do the services or assistance provided under the GEER II SNS program need to be different?

No. The services provided to a nonpublic school under the GEER II SNS program may be the same as, or similar to, the equitable services the nonpublic school is receiving or has received under a CARES Act program. However, the services or assistance must be additive to what was provided under a CARES Act program. Under the GEER II SNS services or assistance to nonpublic schools include those authorized services in section 312(d)(4), nearly all of which are also authorized equitable services under the CARES Act programs.

Is a nonpublic school that received a PPP loan prior to December 27, 2020 eligible to receive services or assistance under the GEER II SNS program?

Yes. A nonpublic school that received a PPP loan prior to December 27, 2020, may receive services or assistance under the GEER II SNS program.

GEER II SNS Services and Assistance

How do nonpublic schools receive services and assistance?

The Ohio Department of Education contracted with Educational Service Centers (ESCs) to provide services and assistance to schools that received a GEER II SNS Final Service Amount. ESCs work directly with nonpublic schools to review the services and assistance that they requested on their GEER II SNS application, request supporting documentation, and provide the allowable requested services and assistance. Through consultation with the nonpublic school, the ESC reviews the services and assistance requested by the nonpublic school on its GEER II SNS application and provides allowable requested GEER II SNS services and assistance. The ESC, as the public entity contracted by the Department to provide GEER II SNS Services and Assistance, determines the means, manner, method and process of the delivery of GEER II SNS services in consultation with the nonpublic school. GEER II SNS services must be provided by September 30, 2024. GEER II SNS services and assistance must address educational disruptions resulting from COVID-19.

Can my school receive reimbursements or GEER II SNS funds directly?

No. Under the GEER II SNS program, nonpublic schools are not direct recipients of federal funds. Nonpublic schools that apply and are selected will receive a service amount. Services will be provided by the ESCs. The contracted ESC will provide services or subcontract to provide services in the amount of the GEER II SNS service amount for each school. The nonpublic school may not receive direct reimbursements or payments.

What services and assistance can be covered through the GEER II SNS program?

The following services and assistance are allowable through GEER II SNS for schools that did not receive both rounds of EANS:

- Supplies to sanitize, disinfect, and clean school facilities
- Protective Equipment (PPE)
- Improving ventilation systems, including windows or portable air purification systems
- Training and professional development for staff on sanitization, the use of PPE, and minimizing the spread of infectious diseases
- Physical barriers to facilitate social distancing
- Other materials, supplies or equipment recommended by the CDC for reopening and operation of school facilities to effectively maintain health and safety
- Expanding capacity to administer coronavirus testing to effectively monitor and suppress the virus
- Educational technology
- Redeveloping instructional plans for remote or hybrid learning or to address learning loss
- Leasing site or spaces to ensure social distancing

- Reasonable transportation costs
- Initiating and maintaining education and support services or assistance for remote or hybrid learning or to address learning loss
- Planning and implementing activities related to summer learning and supplemental after-school programs;
- Providing mental health services and supports, including through the implementation of evidence based full-service community schools and the hiring of counselors;
- Purchasing educational technology (including hardware, software, connectivity, assistive technology, and adaptive equipment) for students that aids in regular and substantive educational interaction between students and their classroom instructors, including students from low-income families and children with disabilities;
- Addressing the needs of children from low-income families, children with disabilities, English learners, racial and ethnic minorities, students experiencing homelessness, and foster care youth; and
- Activities authorized by the Elementary and Secondary Education Act of 1965, the Individuals with Disabilities Education Act, the Adult Education and Family Literacy Act, and the Carl D. Perkins Career and Technical Education Act of 2006.

For nonpublic schools that received both EANS and ARP EANS but have additional needs in response to COVID-19, funds may be used to support literacy efforts aligned to the Science of Reading and Ohio's Plan to Raise Literacy Achievement, including:

- Purchasing high-quality instructional materials;
- Professional development; and
- Literacy coaches.

If a nonpublic school wants to request services and assistance that are different from their original application what is the process?

The nonpublic school will discuss any proposed changes in consultation with the ESC to determine allowable services and assistance. After consultation, the ESC will determine the method, manner and process for providing allowable services and assistance to the nonpublic school. The ESC will submit invoice requests using the Department's GEER II SNS Invoice and Supporting Documentation form. GEER II SNS invoices may only include services rendered by the ESC or third-party provider. Approved GEER II SNS invoices will generally be paid within 10-30 days after submission to the Department.

May GEER II SNS funds be used to pay the salaries of nonpublic school teachers or other staff?

GEER II SNS funds may not be used to cover payroll. Under section 312(d)(7) of the CRRSA Act, a public agency must control funds for services or assistance provided to nonpublic school students and teachers under the GEER II SNS program. In Ohio, the Ohio Department of Education has contracted with ESCs to provide services and assistance. On behalf of the Department, the ESC may contract with a nonpublic school teacher directly to provide secular, neutral, and non-ideological services outside of the teacher's contractual obligation with the nonpublic school. The nonpublic school teacher must be employed by the ESC for GEER II SNS purposes outside of the time he or she is employed by the nonpublic school, and the nonpublic school teacher must be under the direct supervision of the contracted ESC with respect to all GEER II SNS activities. Teachers hired by an ESC under GEER II SNS must meet state licensure requirements as applicable. This may include certification in accordance with [ORC 3301.07](#) and [3301.071](#).

Do PPE purchases need to comply with safety requirements?

Yes. Ohio passed House Bill 169 of the 134th Ohio General Assembly regarding the purchase of personal protective equipment (PPE). Details can be found on this [letter](#) from Office of Budget and Management. Personal protective equipment purchases after January 14, 2022 must be either (1) approved by the National Institute for Occupational Safety and Health; or (2) Authorized for use by the United States Food and Drug Administration, including under emergency use authorization. The ESC or school should comply with Section 125.035 of the Revised Code if applicable. More information can be found at the following links: [National Institute for Occupational Safety and Health](#); [United States Food and Drug Administration](#).

What literacy activities are allowable under GEER II SNS? (Added February 2024)

GEER II SNS funds may be used to support literacy efforts aligned to the Science of Reading and Ohio's Plan to raise literacy achievement, including purchasing high-quality instructional materials, professional development and literacy coaches. See the [Read Ohio webpage](#) for more information. Nonpublic schools will work in consultation with their ESC provider to determine if a request is aligned to Science of Reading. The nonpublic school is not a direct recipient of federal funds, rather it receives services. After engaging in consultation regarding the requested literacy activities and the ESC determining that the service is aligned to the Science of Reading, the ESC will render the service or contract with a third-party provider to render the service.

Literacy Resources

Nonpublic schools can find important literacy resources on the Department's [Read Ohio webpage](#). Included are several helpful videos, guides, and professional development resources related to the Science of Reading. Literacy efforts aligned to the Science of Reading may be funded out of the GEER II SNS program.

What are the licensure requirements for a literary coach? (Added February 2024)

There is not a specific licensure requirement for literary coaches in the nonpublic setting. The individual must be qualified for the position since he or she is contracted by the ESC and paid with federal funds. The ESC determines the requirements needed for the position based on the responsibilities and duties listed in the job description and their own hiring policies, which should at a minimum comport with the Uniform Guidance requirements. The Department recommends that if an individual is coaching on instruction methods, a qualified individual would meet the requirements to provide instruction in the nonpublic setting (same state-issued license as would be necessary in a public school, a permanent non-tax certificate, or in the case of non-chartered, non-tax supported schools, a bachelor's degree, or equivalent diploma from a bible college).

Is professional development allowable under GEER II SNS? (Added February 2024)

Yes. All services rendered under the GEER II SNS program must meet the purpose of supporting nonpublic schools in response to COVID-19, fall into an allowable activity category, be considered reasonable and necessary, and meet all other applicable requirements of the program. The ESC will determine whether particular professional development requests meet these requirements and renders the service on behalf of the Department. The ESC should refer to their own travel policies to set up requested professional development in a manner that is consistent with the federal requirements and maintains control of the federal GEER II SNS resources on behalf of the Department. Professional development costs should be paid by the ESC and not reimbursed directly to the school, since nonpublic schools are not direct recipients of federal funds.

Is there a requirement to supplement, not supplant general fund resources under the GEER II Support for Nonpublic Schools program? (Added February 2024)

No. There is no supplement, not supplant requirement under the GEER II Support for Nonpublic Schools program. Schools may request services in response to COVID-19 that match the allowable use categories of the program referenced above. It is important to note that nonpublic schools are not direct recipients of federal funds. The ESC provider will render all services or contract with a third party to render services. Services should occur during the GEER II SNS period of availability, which runs until September 30, 2024.

Do the GEER II SNS services need to be in place by September 30, 2024? (Added February 2024)

Yes. The period of availability for the GEER II SNS funds ends on September 30th, 2024. All services must be in place by this date. There are instances where if for example a nonpublic school ordered Chromebooks prior to the deadline but they have not arrived, the Department could allow for liquidation beyond September 30, 2024. The Department will work with the ESC provider if these situations arise.

May nonpublic schools make purchases and submit receipts to the ESC for reimbursement? (Added February 2024)

No. Reimbursements are not allowable under GEER II SNS. Nonpublic schools may not make purchases under the GEER II SNS program. Nonpublic schools are not direct recipients of federal funds. Nonpublic schools will work in consultation with their ESC provider to request services. The ESC provider will determine if these services are allowable. Then, the ESC will render the services or contract with a third party provider to render the services.

If Chromebooks or other equipment are purchased with GEER II funds, will the equipment need to be returned to the Department after September 30, 2024? (Added February 2024)

Items can likely remain in the nonpublic setting in many scenarios. In general, federal funds have disposition requirements at the end of the period of performance. In most instances, items purchased by the ESC on behalf of the Department under GEER II SNS may remain in the nonpublic setting if the nonpublic school is using the item for other federal grant purposes, or it meets certain thresholds that match the federal disposition requirements. The ESC provider will work with the nonpublic school to identify the value of items purchased with GEER II SNS resources, and will keep the school informed through consultation regarding whether the items may remain in the school. The ESC will follow the Department's disposition policy regarding all items under GEER II SNS to ensure the Department maintains control of the resources.

Resources

[GEER II SNS Application Template](#)
[US Department of Education GEER Resources](#)
[Read Ohio Literacy Resources](#)

If you have questions, please contact EANS@education.ohio.gov.

If you have questions regarding the GEER II SNS