



THECB

Texas Higher Education
COORDINATING BOARD

Optimizing Your GEER Award

List of Current GEER Grant Programs

Reskilling Rounds 1, 2, & 3

TRUE Institutional Capacity Grant

Texas Completion Repayment Grant

Work-based Learning Internships & Apprenticeships

Reporting Modernization Grant

Accelerating Credentials of Purpose and Value

Open Educational Resources Course Development and Implementation

Grant Program

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Legal Framework

Statutory Authority – Federal CARES Act, specifically section 18002

Federal Regulations – Uniform Grant Guidance [2 CFR 200](#)

Grant Award – Certification and Agreement with the Office of the Governor

Subgrant - Grant award from the Officer of the Governor to the THECB

Subawards – Grant awards from THECB to Institutions of Higher Education

Grantees Should:

- Carefully review the RFA & Institution's submitted application
- Review the Notice of Grant Award
- Eligibility Requirements
- Understand specific program regulations identifying allowable and unallowable activities and expenditures
 - RFA/Grant Agreement
 - GEER Specific Requirements as set forth by the U.S. Department of Education
 - [Governor's Emergency Education Relief Fund - Office of Elementary and Secondary Education](#)
- Document Progress and Use of Funding



General Principles for Costs to be Allowable

- To be allowable the costs must:
 - Align with the grant award terms and conditions
 - Be consistently categorized by the grantee across awards
 - Comply with grantee's established policies and procedures
 - Adhere to Generally Accepted Accounting Principles
 - And not be included in other federally funded programs including matching or in-kind contributions; and
 - Be necessary, reasonable, or allocable for the grant project
 - Necessary to complete the activities within the grant. See 2 CFR 200.403
 - Reasonable is a cost that if in its nature or amount, does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost. See 2 CFR 404
 - Allocable means it can be traced to specific activities of a grant project. Costs to the project are in accordance with the benefits received. See 2 CFR 405

Allowable and Unallowable Costs

- The allowability of costs are detailed at [2 CFR 200.420-.475](#)
 - Currently 54 cost categories
 - Recommend bookmarking for easy reference
- Keep in mind that Uniform Grant Guidance allows for program laws and regulations to deviate from allowable and unallowable costs. Thus, a review of the grant award is also necessary to determine allowability.

Prior Written Approval

- Some allowable costs require prior written approval from the Grantor to be allowable.
- These include but are not limited to: purchase of real property, equipment and capital equipment (including new construction and remodeling), entertainment, travel costs, program income, and pre-award costs. See [200.407](#) for full list.
 - **For GEER grant awards**, prior written approval must be from the U.S. Department of Education or Governor's Office.
 - The U.S. Department has provided prior written approval for pre-award costs dating back to March 13, 2020.

Allowable Use?

- An institution wants to use a GEER grant award to pay fringe benefits for its part-time staff who are assisting in pandemic recovery efforts. The institution does not generally pay fringe benefits for part-time staff.
 - Is this allowable?

Fringe benefit are generally allowable. See 200.431. However, costs must be treated consistently. See 200.403.

Allowable Use?

- An institution received a GEER grant award to assist students obtain employment in their degree field. The institution wants to use grant funds to become a member of a national association for career counselor so that they have access to up-to-date career service innovations.
 - Is this allowable?

Yes, membership, subscription and professional cost activities are generally allowable so long as the primary purpose of the association is not lobbying. See 200.454.

Allowable Use?

- An institution received a GEER grant award for recovery from the Covid-19 pandemic. A student sues the institution over its mask mandate and remote instruction decisions on constitutional grounds. The institution decides to settle the case out of court and wants to use a portion of the grant funds.
 - Is this allowable?

No. Costs including settlement costs resulting from violation or alleged violation of law or regulations are unallowable. There are exceptions to this if the cost is incurred as a result of compliance with specific provisions of the grant award or with prior written approval of the U.S. Department of Education. See 200.435.

Allowable Use?

- A group of faculty want to use funds from a GEER grant award to travel to peer institutions to collaborate on developing short-term credentials.
 - Is this an allowable cost?

No. Travel costs require prior written approval from the Federal agency pursuant to 200.407. GEER awards do not have prior written approval.

Allowable Use?

- Federal Grant funds were advanced in full to an institution in the amount of \$500,000. The institution deposits the grant award in an interest-bearing account. The institution wants to use the interest generated to fund administrative costs tied to the grant award.
 - Is this allowable?

Yes, to an extent. The institution may retain up to \$500 of earned interest to cover administrative costs. Any interest earned over \$500 must be remitted to the Federal Government. See 2 CFR 200.305.

Allowable Use?

- An institution receives a grant award to develop an innovative new certificate program. Part of the grant program involves recruiting students into the program and the institution is holding several information sessions for prospective students. Free food and drinks is a proven method to get prospective students to attend an information session.
 - Is the purchase of food and drinks allowable?

No. There is a very high burden of proof to show that paying for food and beverages with Federal funds is necessary to meet the goals and objectives of a Federal grant. When a grantee is hosting a meeting, the grantee should structure the agenda for the meeting so that there is time for participants to purchase their own food, beverages, and snacks. In addition, when planning a meeting, grantees may want to consider a location in which participants have easy access to food and beverages.



Change Requests

- Follow and monitor your approved grant budget and project
- The following changes to must be receive prior approval
 - Budget changes in any category of plus or minus 25% or more
 - Changes in scope or objective of the grant
 - Changes in key personnel
 - See [2 CFR 308](#)
- Change requests may result in audit findings, additional monitoring requirements, and/or modifications to the grant award.

Audits – Don't Roll the Dice

- GEER fund audits are occurring and ongoing
 - State and Federal audits
 - At THECB and at grantee institutions
- Follow documentation procedures and policies
- Maintain records as set forth in the grant award/RFA
- Organization is helpful





Consequences

- If unallowable costs are reported or uncovered during an audit:
 - Refund of costs plus interest
 - Termination of grant award
 - Major Finding in a Federal Audit
 - Designation of High-Risk on future federal or state grant awards
 - Corrective action plan



Questions?

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