

STRENGTHENING GEAR UP COMPLIANCE & OPERATIONS

About this Exploration Lab

TOPIC Identify a broad range of challenges related to compliance and operations, followed by in-depth conversation with a focus on solutions on several topics.

DATE 2/15/2022 **# OF PARTICIPANTS** 111 **LENGTH** 2 hours **FACILITATOR(S)** Dr. Samantha Briggs
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Exploration Labs are one of [NCCEP's strategies](#) to encourage the GEAR UP community to network, share, learn, and solve problems. Participants contribute ideas to crowdsource promising practices and potential solutions. The collective input of the group is synthesized in this brief Lab Report.

The challenges

Administering a GEAR UP grant is remarkably challenging. Not only does it require a top-notch programmatic team, but it also requires a strong budget, finance, and compliance infrastructure.

Yet, learning how to navigate the federal compliance issues and standing up financial and operational controls, policies, and processes that are responsive to the unique implementation model of GEAR UP can take years to develop.

KEY PARTNERS TO CONSIDER

- U.S. Department of Education program officers
- GEAR UP staff
- Business officers and finance managers
- School administrators and school board
- Coordinators and teachers
- Colleges and community partners
- Subaward recipients

TOPICS DISCUSSED

- [Do's and don'ts of GEAR UP funds](#)
- [GEAR UP policies and procedures](#)
- [Navigating match](#)
- [Subrecipients and subawards](#)
- [Carryover funds and no-cost extensions](#)
- [Impact of COVID and GEAR UP operations](#)
- [Navigating audits](#)

OTHER CHALLENGES FOR FUTURE DISCUSSION

- Balancing providing new services while staying in compliance
- Creating living documents across agencies
- Return on investment within time constraints
- Communication
- Supporting effective transitions
- Engaging partners for resources
- Staffing issues: COVID-related but also turnover and short-term staff
- Creating a GEAR UP “playbook” for expenditures and match
- Reconciling requirements of grant and school

Do's and don'ts of GEAR UP funds

CHALLENGES

- How to allocate GEAR UP funds most effectively

Potential repercussions

- Differing opinions of what “reasonable” is all about (activities that do not align with the goals of the program)
- Different priorities can cause us to lose focus

Root causes

- Lack of information and/or not knowing where to start

SOLUTIONS

- Ask and speak up, even if you are not sure of what you need
- Use resources that are already created - search for and ask about them
- Hire someone who knows a spreadsheet!

Key partners

- Program officers
- Business/budget offices at your institution

Helpful resources

- [Uniform Guidance Allowable Expenses](#)
- [NCCEP Quad](#)
- [GEAR UP Digest](#)



GEAR UP policies and procedures

CHALLENGES

GEAR UP compliance requirements are expansive, and often cannot be satisfied with preexisting institutional policies and procedures. In addition:

- There is a constant need to update policies and procedures
- Uniform guidance isn't black and white, so you have to use judgement
- Training for staff as compliance requires the support of all

Potential repercussions

- Bad things happening
- Not making policies and procedures concise so that they don't apply to a one-off incident

Root causes

- Disconnects between existing policies and the needs of GEAR UP
- Some issues don't have a single source of “truth”
- Not having policies and procedures clearly and succinctly written

SOLUTIONS

- Create an online version of the manual to make it more accessible
- Set times to review the policies and procedures
- Create an environment where everyone is responsible for compliance
- Poll staff to see what they are not clear on
- Have staff check-off that they have read the policies and procedures manual
 - “Touch-base Tuesday” or “Training Tuesdays” with staff to discuss issues/items that may come up

Key partners

- Campus administrators
- Federal and state guidelines
- Vendors / partners

Helpful resources

- [GEAR UP Legislation and Regulations](#)
- [Harvard Office of Sponsored Programs](#)
- [University of Utah STARS! GEAR UP Site Coordinator Manual](#)
- [Cornell Office of Sponsored Programs](#)

Navigating match

CHALLENGES

- Establishing common forms, processes, and documentation methods
- Making sure that all match partners understand that for volunteer time for teachers likely cannot be counted as match if their it occurs during time covered under their contract, but time outside of normal contract hours can often be counted—consult with your program officer
- Counselors: are they treated like administrators or teachers?
- Administrators can meet throughout the regular day
- Facilities are treated very differently from services and there are many complex rules
- If you are not allowed to spend GEAR UP money on something, you can't collect match for it

Potential repercussions

- Loss of federal grant dollars
- Loss of community partners that are not 100% on board
- What the district contributes in-kind influences total amount you can request for your federal budget

Root causes

- Budget for match: how much do I need to ask to run my program?
- The compliance requirements of match mirrors the complexity of using federal dollars

SOLUTIONS

- Collect every dollar of the match and extra in the event you get audited and they don't approve some of your services.
- Document, document, document in the event of an audit
- Understand the full suite and potential of match sources
- WalMart school supplies donations can be counted
- Forecast for match is a way to innovate and see what else can be brought in to elevate the program and gather a wider more diverse range of stakeholders
- If eligible, apply for a match waiver to reduce your match obligation
 - *Legislation*: request to reduce match granted only under extreme circumstances
 - *Pandemic*: Congress inserted language into the CARES Act to allow GEAR UP to request waiver to gather remaining match from March 2020–September 2022

Helpful resources

- [Common Match Sources in GEAR UP](#) (PDF)

Subrecipients and subawards

CHALLENGES

- Defining a partner as a subrecipient or a contractor—there are tradeoffs with each
- How to monitor subrecipients to ensure compliance across the board (services, funds, data) in a timely manner
- How to ensure subawards take ownership in their roles and duties
- Establishing a risk assessment and monitoring process for audit purposes

Potential repercussions

- Non-compliance
- Audit findings

Root causes

- Lack of understanding and clarity related to subrecipients

SOLUTIONS

- Regular discussion around operations and procedures: what is working, what isn't
- Come to an agreement on what works for all parties and agencies, trial and error
- Establish a monitoring system for subrecipients
- Single source documentation: providing templates, examples on how to report, everyone knows where to go for forms

Key partners

- Everyone: programming & operations working together!
- Knowledgeable leadership that can explain the whys

Helpful resources

- [USU GEAR UP Schools Risk Assessment](#)
- [NCCEP Quad](#)
- Small learning communities (BOO Group, Directors' meetings)

Carryover and no-cost extensions

CHALLENGES

- Consistency when spending throughout the years to avoid carryover. Staying aligned with the proposal submitted at the start of the application/grant award
- Proposed and allotted funds for scholarships
- Burn out and the repercussions of COVID - ability to provide scholarships for students who took a year off
- How to end grant and pay for staff to finish reporting

Root causes

- Competition that doesn't happen
- Unexpected savings or slow to spend down
- 120 days to get invoices and final paperwork in

SOLUTIONS

- Have partners who can fill in the gap (ex. state funding)
- Focus on sustaining programs
- Some initiatives are let go once GEAR UP funding no longer exists
- Hire evaluation team to help with reporting and using carryover funds
- Final report done before the end of the grant; after September 25 - fiscal agents take on the cost

Key partners

- Postsecondary institutions and state to sustain funding

Helpful resources

- [About No-Cost Extensions](#) (PDF)



Impact of COVID and GEAR UP operations

CHALLENGES

- Being able to launch and plan for events especially in person events, everything taking more time because of having to go through virtual channels
- Attendance, engagement outside of the classroom and in the virtual space; how do we connect with our students; how to capture attendance for reporting
- Buy in from schools
- Being able to go into schools/have teachers be willing to give their time to join sessions
- Virtual engagement

Potential repercussions

- Losing your staff, staff morale, questions of how do we move forward, how do you align with district and school initiatives
- Burnout and retirement of qualified teachers and staff
- Constant changes in work plans being unable to really plan for everything
- Strikes happening
- Students/families and guardians are fearful of the future because there is so much uncertainty

Root causes

- COVID has brought to life several of the educational inequities on a larger scale

SOLUTIONS

- Be proactive, think of creative strategies, don't shy away from presenting solutions to district leaders, really utilize your space and ideas
- Build the capacity for virtual events (including the tech infrastructure) to bring people together as much as you can. Make events really open and allow conversations to be open and fluid. Make virtual events as great as they can be
- Be creative. Throw out the idea of sticking to what we used to do. We need to be open to new ideas and processes that are currently better suited to help our students and staff
- Be aware that not all solutions are perfect
- Lean on partnerships to help leverage communications and strategies
- Establish mediums for communication for internal and external partners

Key partners

- Colleges
- GEAR UP staff
- Site administrators
- Buy in from everyone

Helpful resources

- [U.S. Department of Education COVID-Related Flexibilities](#)
- Text for success platform to communicate with students



Navigating audits

CHALLENGES

- Ensuring that your program complies with the fiscal agent's policies/procedures and U.S. Department of Education (ED). When there's a conflict, show your agency supporting documentation from ED.
- Ensuring that your program has supporting documentation
- Collecting and managing the data (calculations are appropriate, protecting spreadsheets, etc.)
- Checks and balances—communication is key!

Potential repercussions

- An orange or tan jumpsuit-LOL
- Losing the grant
- Students and families lose access to services
- Tarnished reputation
- Loss of access to future funding

Root causes

- Not having a good system in place to collect/ manage data (memorializing/institutionalizing data process)
- Not being adaptable
- Knowledge of responsibilities/expectations (roles/responsibilities should be frequently reviewed/updated)
- Consistent messaging re: policies and procedures (internal audits)
- Inconsistent communication w/school partners
- Infrequent communication re: operations + compliance from leadership
- Infrequent drawdowns + large carryovers

SOLUTIONS

- Learn from other auditing experiences
- Ensure adequate documentation
- Produce and refer to your policies and procedures manual

Additional NCCEP resources

Visit the [NCCEP Quad](#) to view resources and ask questions of the GEAR UP community.