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Reference: Page 10 Section D. of the Draft Program Guidelines, dated today 1/20/2021

“Third parties may complete applications on behalf of LEAs but may not sign or enter into agreements on behalf of LEAs. No funding will be provided for the costs of completing an application for funding or for third-party consultant fees for implementing programs.”

Comment: The SEES programs as described are very technical in their measures and will be beyond the expertise of many in-house LEA staff members of all but the largest school districts. Yet the program purports to reach “underserved communities” first. The prevailing wage and public works requirements also will not be easy to successfully navigate for smaller, “underserved” LEAs. As are the reporting and verification requirements. Eliminating the participation and support of third-party consultants in the programs by prohibiting funding for them will therefore be unlikely to achieve the desired stimulus result. It would not be possible to dedicate sales, marketing, project management, and verification/reporting resources towards developing these important programs and projects without compensation. Most smaller, “underserved” LEAs would likely not be able to participate on their own.

Thank you for the opportunity to comment.

With gratitude, thank you.



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