

WEBINAR FOLLOW UP (updated April 5, 2021)

This document provides a summary of answers to common questions received during the series of webinars NCDPI hosted for nonpublic schools on March 25 and March 26, 2021. The Questions and Answers will be updated on a regular basis to reflect new questions NCDPI receives.

You may also refer to resources on the EANS website, including the following guidance:

- [FAQs](#), U.S. Department of Education | updated 3/19/21

Acronyms

CARES = Coronavirus Aid, Relief, and Economic Security Act

CRRSA = Coronavirus Response and Relief Supplemental Appropriations Act

DPI = NC Department of Public Instruction

LEA = local education agency

NCPRO = NC Pandemic Recovery Office

NCSEAA = North Carolina State Education Assistance Authority

PPE = personal protective equipment

PPP = Paycheck Protection Program

SBE = State Board of Education

SEA = State Educational Agency

The original question and answer document was issued on March 25, 2021 and provided as a supplement to EANS program guidance issued by the U.S. Department of Education. Answer to questions posed during the webinars hosted on March and March 26, 2021 are indicated in parentheses). Schools and stakeholders interested in the EANS program are strongly encouraged to review [federal guidance](#) in addition to the information provided below.

Section A – Program Overview and Eligibility

A-1. What is EANS?

The **Emergency Assistance for Nonpublic Schools (EANS)** program was established by Congress as part of the Governors Emergency Education Relief Fund (GEER). The purpose of the program is to provide **funding for services or assistance to eligible nonpublic schools to address educational disruptions caused by COVID-19.**

A-2. Who administers the program?

The U.S. Department of Education awards EANS funds to the Office of the Governor. By federal law, the Governor must designate the State Educational Agency (SEA) to administer the program.

Therefore, **the North Carolina Department of Public Instruction (DPI)** administers the EANS program in North Carolina.

A-3. Who should we contact with questions?

DPI will hold technical assistance webinars and consultations about EANS funding. Check the [EANS website](#) for more details or email EANS@dpi.nc.gov.

A-4. Who can apply?

Nonpublic elementary or secondary schools are eligible to receive assistance through EANS if they:

- Are non-profit
- Are accredited, licensed, or otherwise operates in accordance with State law. In NC, this means the school must be registered with the Division of Non-Public Education at the NC Department of Administration.
- Were in existence prior to March 13, 2020
- Did not, and will not, apply for and receive a loan under the Small Business Administration's Paycheck Protection Program (PPP) on or after December 27, 2020

A-5. Are home schools eligible for EANS funding?

No; home schools are not eligible for EANS funding.

A-6. Are religious schools eligible for EANS?

Yes, provided that the school meets the eligibility criteria detailed above. However, federal law and guidance clarifies that any materials, equipment, and any other items used to provide services or assistance through EANS must be used for secular, neutral, and nonideological purposes.

A-7. Can our school apply for EANS and a PPP loan?

Schools are ineligible for EANS if they have received or will receive a Paycheck Protection Program (PPP) loan on or after December 27, 2020.

Schools that received PPP loans **prior to** December 27, 2020, are eligible for EANS, but expenditures that were covered by PPP may not be reimbursed through the EANS program.

A-8. Our school received funds from the State of North Carolina via the NC State Education Assistance Authority through the Coronavirus Relief Fund (CRF). Are we eligible for EANS?

Yes, but any expenditures reimbursed using CRF may not be reimbursed through EANS.

A-9. Will an EANS award change our school's Federal funding status?

No. Federal law specifies that schools that participate in EANS will not be considered recipients of Federal financial assistance.

A-10. If we did not lose enrollment and we did not lose revenue are we still eligible for EANS? *(updated April 1, 2021)*

Not losing enrollment does not make your school ineligible. Eligibility is based on the program criteria, [detailed above](#).

A-11. If the schools who take PPP Round 2 leave more funds available in this program, will those funds be allocated to the schools who are eligible to participate in this program? *(updated April 1, 2021)*

Opportunities for increased awards will be communicated after the application period has closed.

A-12. When the application is asking for dollar amounts such as amount received through PPP funds, can we round or do we need to make sure numbers are exact to the dollar and cents? *(updated April 1, 2021)*

Provide the exact amount.

A-13. How does participation in PPP disqualify a school from participating in the EANS program? *(updated April 1, 2021)*

Under federal law, a school cannot participate in both EANS and PPP if the PPP loan is received on or after December 27, 2020. If a school received funds from a PPP loan prior to December 27th, the school is eligible for EANS, but any expenditures that have been or will be paid for using PPP funds may not be reimbursed through the EANS program. Merely applying for a PPP loan on or after December 27, 2020, does not make a school ineligible for the EANS program. However, if a school has entered an agreement to receive a PPP loan on or after December 27, 2020, they are ineligible for the EANS program.

A-14. Are ESSER funds the same as the equitable relief funds referenced in the webinar? (updated April 1, 2021)

Yes.

A-15. CARES Act funds we received do not need to be counted as CRF funds? (updated April 1, 2021)

Expenditures that have been or will be reimbursed by another federally-funded program (e.g., CRF, PPP, ESSER) may not be reimbursed through EANS.

A-16. What are the Coronavirus Relief Funds that we were supposed to have received through Opportunity Scholarships? Is there another name for these funds? (updated April 1, 2021)

Session Law 2020-97 of the General Assembly directed Coronavirus Relief Fund (CRF) aid to non-public schools to cover the cost of PPE. By State law, the funds were allocated based on the non-public school's share of Opportunity Scholarship recipient students. NCSEAA administered these funds and disbursed them to schools in October 2020.

A-17. Are the CRF funds the same as ESSER funds? (updated April 1, 2021)

No. CRF is the state aid provided to North Carolina in the CARES Act and allocated by the General Assembly through session law. ESSER I was also created by the CARES Act but was granted directly to NCDPI to allot to LEAs. There was an equitable services requirement for ESSER I but not ESSER II or ESSER III.

Section B – Allocations and Application Process

B-1. How much funding is available?

The total EANS award for North Carolina is \$84,824,393. Federal law provides that half of a percent (0.5%) may be used to administer the program. Therefore, up to \$84,400,271 is available to support assistance to nonpublic schools through EANS. Initial planning amounts are available at <https://www.dpi.nc.gov/media/10240/download>. Final award amounts will be provided following the application period to participating schools based on the approved formula (see guidance below).

B-2. How are allocations determined?

Federal policy requires North Carolina to prioritize services to schools that serve students from low income-families. Therefore, the allocations formula considers the number of students enrolled at a school and available “low income” indicators.

The allocation formula is comprised of three elements:

- “Base Amount”- flat foundation provided to each eligible school to ensure smaller schools that serve smaller communities have sufficient assistance through EANS. It further helps mitigate the impact of fluctuating enrollment.
- "Enrollment Share" - based on total enrollment for all students regardless of income. Enrollment is based on enrollment data provided by the Division of Non-Public Education for the 2019-20 school year.
- "Low Income Share"
 - (1) the share of Title I funds directed toward the school district in which the school is physically located
 - (2) the number of Opportunity Scholarship recipients attending the school

Element	Share %
Base Amount	10%
Enrollment Share	40%
Low Income – Service Area	25%
Low Income – Opportunity Enrollment	25%
	100%

B-3. My school has different enrollment than is reflected in the planning allotment. Can that be amended?

No. Enrollment data is based on what the school reported to the Division of Non-Public Education for the 2019-20 school year. If a school had not provided a report for the 2019-20 school year, the Division of Non-Public Education used enrollment data from the school’s most recent report prior to the 2019-20 school year. The 2019-20 school year is used per federal guidance.

B-4. My school meets the eligibility criteria but is not on the “planning allotments” list. How do I apply?

You school’s director should contact EANS@dpi.nc.gov to provide documentation of eligibility. This will require (1) an 501(c)(3) determination letter from the IRS, (2) verification from the Division of Non-Public Education, and (3) confirmation that your school was in operation prior to March 13, 2020. We have set aside funds to accommodate circumstances like this.

B-5. When will applications be available and when are they due?

The applications will open on March 25, 2021, and close on May 31, 2021.

B-6. When would we be able to purchase items under EANS given your timeline? *(updated April 1, 2021)*

We are currently planning to start processing reimbursements and vendor purchases for approved non-public schools at the end of April, but that is subject to change, as the application period does not end until May 31, 2021.

B-7. Who can submit the application?

Individual schools or organizations that have governing authority over a group of nonpublic schools. Organizations may submit an application on behalf of their member schools, but funds will be based on the component schools' allocations.

B-8. What is enrollment share? *(updated April 1, 2021)*

Enrollment share is a per pupil amount based on the number of students a school reported to the Department of Administration.

B-9. What criteria is used for determining low income? *(updated April 1, 2021)*

North Carolina has limited data on students enrolled in non-public schools. As suggested by federal guidance, we have identified two proxy indicators: share of Opportunity Scholarship recipients and a calculation based on the share of low-income students in the school's surrounding community.

B-10. Should we include preschool students in our enrollment number, or does this apply only for kindergarten and up? *(updated April 1, 2021)*

Preschool students should not be counted toward enrollment numbers, per federal guidance.

B-11. Can you confirm that the timing of our application submission will not impact the amount of funds we would receive (not first come first served) as long as we submit our application by the 5/31 deadline? *(updated April 1, 2021)*

The planning amounts published on February 24, 2021, can be considered as a "guaranteed" eligibility amount for schools who apply before the deadline and are approved to participate.

B-12. What if our physical address does not have a mailbox to be able to receive mail? (updated April 1, 2021)

The physical address is needed for the FFATA reporting that will have to be completed. The FFATA system requires the physical address to match the site with the DUNS number and congressional district. The physical address is needed for reporting, but will not be needed for actual “mailing” of information.

B-13. Will our allotment change based on low income information in the application? (updated April 1, 2021)

No. The low-income information is required on the application by federal law and will be used from informational purposes. The allocation amount is based on publicly available information, in alignment with federal guidance.

B-14. Will the school need a separate DUNS number if the church that operates the school has a DUNS number? (updated April 1, 2021)

The DUNS number is tied to the school. If the church is the fiscal agent, it could be one and the same.

B-15. Could our funding be more if fewer than 739 schools apply? (updated April 1, 2021)

Potentially, but there is no guarantee that allocation amounts will adjust. Schools approved to participate will receive notice if they become eligible for more funding.

B-16. If our application is rejected will we be able to submit a modified application? (updated April 1, 2021)

Yes.

B-17. If you did the consultation with LEA but did not take funding, do you answer question 31 yes or no? (updated April 1, 2021)

The private school would only mark yes if they participated in receiving equitable services from the district (services/assistance). If they consulted and did not receive equitable services (no funding is actually transacted-only equitable services provided by district) then they would answer no.

Section C – Use of Funds

C-1. How can we use the funds?

The EANS program does not provide financial grants but rather makes the non-public school eligible for assistance and services provided by DPI (or any entities it contracts with to provide services). Approved schools will be able to request assistance and services in the following ways:

1. Reimbursement for eligible expenditures incurred between March 13, 2020, and the award date;
2. Reimbursement for eligible expenditures incurred after the award date during the allowable period.
3. Payment for eligible services or goods made by DPI and made available for use by the schools.

Federal law **requires public control** of EANS funds. Therefore, the State of North Carolina retains title to property, materials, or goods paid for through the EANS program.

C-2. Who owns equipment, property, and materials paid for through EANS?

Per federal law, DPI will retain ownership of equipment and supplies purchased with EANS funds for a nonpublic school. Equipment and supplies may be used for the authorized purposes of the EANS program through September 30, 2023 or until the equipment and supplies are no longer needed for the purposes of the EANS program. At that point, DPI (or another public agency) must take possession of any non-consumable assets (e.g., laptops, portable air filters, etc.). Please refer to federal guidance (Sections D and E) for more details on requirements and procedures.

Schools will be required to provide inventory of all goods reimbursed or paid for through EANS and a physical inventory of any non-consumable assets may be required at the beginning of the award period and periodically throughout to comply with state and federal requirements.

C-3. What expenditures are eligible under EANS?

Nonpublic schools may apply to receive services or assistance to address educational disruptions resulting from COVID-19 under several categories.

Categories:

1. Supplies to sanitize, disinfect, and clean school facilities
2. Personal Protective Equipment (PPE)
3. Improving ventilation systems, including windows or portable air purification systems

4. Training and professional development for staff on sanitation, the use of PPE, and minimizing the spread of infectious diseases
5. Physical barriers to facilitate social distancing
6. COVID-19 testing
7. Educational technology
8. Redeveloping instructional plans for remote or hybrid learning or to address learning loss
9. Leasing sites or spaces to ensure social distancing
10. Reasonable transportation costs
11. Other materials, supplies, or equipment recommended by the CDC for reopening and operation of school facilities to effectively maintain health and safety
12. Initiating and maintaining education and support services or assistance for remote or hybrid learning or to address learning loss

In general, EANS funds may cover supplies, materials, and property related to the above categories and may not cover personnel and labor costs. Further, EANS funds explicitly may not be used to cover payroll or other personnel costs at a non-public school. Please refer to federal guidance (Section D) for details.

C-4. Are window screens a permissible use of EANS funds? We now keep all windows open to improve air flow. (updated April 1, 2021)

Yes.

C-5. In addressing ventilation to isolate our classrooms, would these funds be approved to install mini-splits so that each room is isolated from the other? (updated April 1, 2021)

Yes, provided that any such installation can be removed at the end of the grant period or when the equipment is no longer needed. Please review question E-2 of the federal guidance.

C-6. In Part D/Improvements to ventilation systems it says we may not be reimbursed for funds spent prior to March 25 except for portable air purification systems: does this mean we can ask for reimbursement for past items to improvement to ventilation systems? (updated April 1, 2021)

No. The only reimbursable expenditure related to ventilation systems are portable air purification equipment, per federal law. Please review question E-2 of the federal guidance.

C-7. Would lease payments be allowed on mobile units to ensure safe social distancing? (updated April 1, 2021)

Yes.

C-8. Can funds be used to pay past due or delinquent lease payments? *(updated April 1, 2021)*

EANS funds may be used to reimburse the leasing of sites or spaces necessary to ensure safe social distancing in accordance with CDC and NCDHHS guidance.

C-9. Could funds be used to upfit a rental facility required to provided social distancing? We need to bring the fire alarm system up to standards prior to occupying the building. *(updated April 1, 2021)*

Federal guidance does not provide for this as a permissible expense.

C-10. It states that the funds can be used for leasing property. Could it be used to reconstruct classroom space or rent portable classrooms? *(updated April 1, 2021)*

Costs associated with installing physical barriers to facilitate safe social distancing are permissible, provided that the barriers are not permanent and can be removed at the end of the grant period. Please review question E-2 of the federal guidance. EANS funds may be used to reimburse the leasing of sites or spaces necessary to ensure safe social distancing in accordance with CDC and NCDHHS guidance.

C-11. Could we use funds to pay staff to offer afterschool intervention programs and summer recovery? *(updated April 1, 2021)*

EANS funds may not be used on personnel costs. However, the State would be allowed to contract with non-public school staff to provide services beyond their normal, contractual duties as an employee of a non-public school.

C-12. Our janitorial service costs increased to allow for thorough disinfecting of the entire school. Is this an allowable expense? *(updated April 1, 2021)*

No. If a school has contracted for cleaning and seeks reimbursement, they may be reimbursed for the cost of supplies but not for labor costs.

C-13. We have been face to face all year and our enrollment has almost double. We are in great need of tables/desks and supplies. Would these be covered? (updated April 1, 2021)

Federal guidance does not provide additional supplies due to increased enrollment as a permissible use. Any such costs would have to be directly related to facilitating safe social distancing or mitigating the spread of infectious disease.

C-14. How does the reimbursement and vendor purchase process work?

Requests for reimbursements and vendor purchases will be submitted through a central online portal.

The participating school will be required to submit full source documentation (e.g., receipts and invoices) to justify any requests for reimbursement for eligible expenditures. All reimbursements will be reviewed by State staff prior to approval. The title to any property, material, or goods reimbursed through EANS transfers to NCDPI, in accordance with federal law, even if the nonpublic school originally purchased and owned the item.

Vendor purchases will be fulfilled by the State upon review of reasonableness and allowability. NCDPI will retain title to any items paid for through EANS.