

EANS Program – Frequently Asked Questions

Updated: 3-10-2021

General

1. Is a school precluded from participating if we do not have students from low income families?
No. All nonpublic elementary and secondary schools that are authorized or registered to operate in the State are eligible for the EANS program.
2. What is the rationale for reimbursements only allowed up until 2/26/21? We are just received the allocations on that date, so how could we already have spent funding we didn't know we had?
Maryland is operating the EANS program on a reimbursable basis in order to expeditiously and efficiently provide relief to nonpublic schools. Nonpublic schools have been open and operating during the Pandemic and as such, have incurred costs to open and operate per the CDC guidelines.
3. How likely will schools receive funding above the per pupil allocation?
At this time, MSDE cannot provide this estimate.
4. School that received a PPP loan are not eligible, but on page 6 the application appears to allow schools to receive funds that were not already funded by the PPP. Can you clear that up?
The CARES Act, which was implemented in the spring of 2020 and the CRRSA that was implemented in December 2020 both include PPP programs. A nonpublic school may not participate in both the EANS program and the CRRSA PPP program. Schools that participated in the first PPP program are eligible to participate in the EANS program.
5. Reimbursement model only does not allow all schools to use the funds to best advantage of the school, what if a school does not have anything that needs to be reimbursed, does that mean they forfeit the money they are eligible to receive under the language of the law.
Schools must have eligible expenses to request reimbursement from the EANS program.
6. Can we extend the deadline for expenditures to at least one week from now but keep the April 2 deadline?
At this time, the deadline has not been extended.
7. is it true that funds not expended under this program revert to the governor and can be used for public schools?
State Education Agencies (SEAs) have six months from receipt of the program funds to obligate the funds. Funds not obligated at that time revert to the Governor's Emergency Education Relief Fund.
8. Will applications be reviewed all at once after April 2 or is the review on a rolling basis once applications are submitted?
MSDE expects to begin reviewing applications as they are received. However, incomplete applications will not be accepted, and therefore, not reviewed.
9. Was there any consultation with private schools in setting up this program.
Individual consultations with nonpublic schools is a requirement of the Equitable Services component of the federal ESEA and IDEA programs. It is not a requirement of the EANS program. However, MSDE staff met with CAPE leadership in late February to share the State's plan for administering the program.
10. Where any of the recommendations provided by CAPE implemented in the process?
The CAPE leadership shared concerns about the State's implementation plan.
11. If an application is rejected for incomplete information, will the school be notified and allowed to re-submit the application?
If an application is incomplete, it will not be accepted and the school will be notified.
12. If a school has multiple locations, do we need to submit separate applications for each location?

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If the individual locations have a separate MSDE ID#, they should submit separate applications.

Timeline

1. What if our allowable expenses were in July, 2020 going forward?
Expenses for allowable items that were incurred between March 13, 2020 and February 26, 2021 are eligible for reimbursement.
2. Schools will need items for 21-22 and the funds are intended to cover items until September 2023, why are we not permitted to be reimbursed for items going forward?
The program was developed to enable nonpublic schools to participate in emergency education relief associated with the COVID-19 pandemic. The CRRSA Act does not prescribe how an SEA distributes services or assistance to nonpublic schools; accordingly, an SEA has flexibility. SEAs should communicate, as soon as possible, the services and assistance available to each nonpublic school so that the school can weigh whether to pursue a PPP loan instead.
3. What is the timeframe for eligible purchases?
The timeline for reimbursement of eligible purchases is March 13, 2020 until February 26, 2021.

Enrollment/Staffing

1. What is total admin staff?
Administrative staff are those positions that have administrative responsibility for school operations.
2. What date do you want us to use for enrollment and staffing numbers? Those can change during the school year.
The enrollment and staffing data should be a single point in time/date for the 2019-2020 school year.
3. Are all non-teaching employees considered administrative staff?
No. Administrative staff are those that have administrative responsibility for school operations.
4. Is the question for 1A (enrollment for 19-20) what is being used to determine a school's EANS award or another enrollment number that MSDE already has on file somewhere?
MSDE does not have a mandatory, verified data collection for nonpublic school enrollment, student demographics, or staffing data. To meet the federal reporting requirement for this program, MSDE is asking nonpublic schools to provide the 2019-2020 school enrollment. The school allocation for the EANS program is explained in the application on page 8.
5. How are classroom assistants categorized? Administrative?
Classroom assistants are not a component of the data collection requested for this program.
6. What grade levels are included in the enrollment?
The enrollment should include students in grades K-12, for the grade levels served by the school.
7. Is total enrollment inclusive of PRek3 and PreK4 or K-8 only?
Prek students are not included in the enrollment total for this program.
8. Are teachers who are "conditionally certified" considered certified or non-certified for this application?
Conditionally certified teachers should be considered certified teachers for this data collection.

Poverty Data/Low income students

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1. Is there a reason we are not using the school enrollment data to determine funding allocations but instead at the county level?
The school enrollment is used to determine funding allocations. Because there is not a standardized, verified data collection for nonpublic school students, the county poverty rate is applied to the enrollment total to determine the number of low income students.
2. What are we not using our individual school FARMS or low income data?
Because there is not a standardized, verified data collection for nonpublic school students, the county poverty rate is applied to the enrollment total to determine the number of low income students.
3. Using county data hurts schools that have higher than the county average of low income data thus going against the language of the law.
The SEA is responsible for establishing poverty criteria from among generally available sources of poverty data, for nonpublic schools to identify the number and percent of children from low income families.
4. Schools have to explain how we define low income, but the program will calculate low income based on the rate in Schedule B, no matter how we calculate low income. Is that correct?
The application requests the total enrollment for the nonpublic school. Additionally, nonpublic schools are asked to provide the number of students from low income families as well as the means used to identify low income families. This data collection is separate from the allocation of EANS program funds to nonpublic schools.

School Allocations

1. Can you demonstrate again how to calculate per pupil rates?
Nonpublic schools multiply the 2019-2020 enrollment for students in grades K-12 served by the school by the poverty rate for the county where the school is located to identify the number of low income students. Next, subtract the number of low income students from the total enrollment to get the number of non-low income students. Multiply the low income student count by the low income per pupil amount - \$420. Multiply the non-low income student count by the non-low income per pupil amount - \$215. Add the results of the last two steps to determine the nonpublic school's calculated allocation of EANS program funds.
2. So this calculation actually determines the "low=income" students in your school?
The nonpublic school's calculated allocation of EANS program funds determines the low income students for purposes of the allocation. For Nonpublic schools that use a method of determining the number of low income students for other purposes, should report both the number of low income students and the method for identifying low income students in Part 1, item A on page six of the application.
3. How do you determine the number of low income students?
For the calculated allocation of EANS program funds, nonpublic schools multiply the 2019-2020 enrollment for students in grades K-12 served by the school by the poverty rate for the county where the school is located to identify the number of low income students. For Part 1, Item A on page six of the application, nonpublic schools that use a method of determining the number of low income students for other purposes should report both the number of low income students and the method for identifying low income students.

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If a nonpublic school does not identify low income students for other purposes, the information in Part 1, Item A should be zero, and none.

4. Should the per-student allocation calculation be rounded?

Yes. The result of the calculation to determine low income and non-low income students in the school should be rounded up or down to the nearest whole number.

Reimbursement Process

1. Can you confirm we can be reimbursed for any expenses paid before application i.e... we can still make purchases and be reimbursed in March?

Expenses for allowable items that were incurred between March 13, 2020 and February 26, 2021 are eligible for reimbursement.

2. Is the form on page 9 the one invoice mentioned at the bottom of the page or are you asking for an additional invoice?

The Payment Documentation is fully explained in Appendix C of the application. Nonpublic schools should submit one invoice from the school that includes the Payment Documentation table (Item C-2) as well as copies of the invoices that were paid by the school and included in the request for reimbursement.

3. Do we submit expenses that are exactly equal to our calculated allocation?

Nonpublic schools should identify items in the request for reimbursement that come as close as possible the school's allocation. If the payment documentation includes an invoice total that exceeds the school's calculated allocation, MSDE will only reimburse up to the school's total allocation.

4. Can we use the money for things we are planning on purchasing over the summer or just items that have already been purchased?

Expenses for allowable items that were incurred between March 13, 2020 and February 26, 2021 are eligible for reimbursement.

5. What evidence is needed of actual purchases?

The Payment Documentation is fully explained in Appendix C of the application. Nonpublic schools should submit one invoice from the school that includes the Payment Documentation table (Item C-2) as well as copies of the invoices that were paid by the school and included in the request for reimbursement.

6. Do we need to submit each individual monthly invoice for a recurring service, or will a monthly invoice do with a note of monthly status?

For allowable recurring expenditures, copies of the paid invoices should be submitted.

7. Is the invoice the only form of payment documentation needed for expenses?

The Payment Documentation is fully explained in Appendix C of the application. Nonpublic schools should submit one invoice from the school that includes the Payment Documentation table (Item C-2) as well as copies of the invoices that were paid by the school and included in the request for reimbursement.

8. How soon will reimbursements be issued?

MSDE estimates a total of six weeks to review the documentation certifications and to process payments.

9. Will all payments be electronic deposit or can checks be issued?

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MSDE believes that in the interest of time, checks will be issued by the Comptroller's General Accounting Division.

10. Would reimbursement be reduced by only out of scope expenses or rejected as a whole?
Out of scope expenditures should not be included in a request for reimbursement.
11. Do we have to limit the expenses we list to the amount we are allocated under the allocation calculation? Or should we list all expenses, knowing that our reimbursement will be limited?
Nonpublic schools should identify allowable expenditures for reimbursement up to the school's calculated allocation for the EANS program.
12. How will costs over the allocation limit be reimbursed?
At this time, MSDE believes that the allocation methodology will utilize all of the EANS program funds. As certification documents are received and reviewed by MSDE, the program fund balance will be monitored.

Allowable Uses

1. We had to hire additional teachers because of social distancing requirements. Is that allowable, if so, under what category.
EANS funds may not be used to provide funds to non-public schools to cover payroll.
2. We purchased a trailer, did not lease it, due to social distancing needs. Can that be included?
Yes, this is an allowable expense.
3. If the school nurse went from part time to full time can we claim for these funds?
EANS funds may not be used to provide funds to non-public schools to cover payroll.
4. Or extra staff due to smaller room sizes?
EANS funds may not be used to provide funds to non-public schools to cover payroll.
5. Would COVID testing supplies be covered under supplies recommended by the CDC for reopening?
Yes, COVID testing supplies would be an allowable expense.
6. Would upgrades to ventilation be included?
Portable air purifiers are an allowable expense.
7. Are stipends given to teachers for extra duties covered?
EANS funds may not be used to provide funds to non-public schools to cover payroll.
8. Is leasing cost allowable?
Yes, leasing sites or spaces to ensure social distancing are an allowable expense.
9. We have had a major increase in electricity due to new filtration system and filters due to Covid. Can we use this as an expense?
Although the statute authorizes the use of EANS funds to improve ventilation systems, it does not cover costs associated with the ongoing operation of such systems.
10. Are cleaning service contracts allowable?
Nonpublic schools may request reimbursement for supplies to sanitize, disinfect, and clean school facilities. State Education Agencies may not reimburse for the cost of a cleaning contract.
11. Is it acceptable to purchase desks to replace tables in areas like KG and library for social distancing?
Yes, this is an allowable expense.
12. Did you already address if costs of upgrading ventilation is allowable?
Portable air purifiers are an allowable expense. Upgrading ventilation is not a reimbursable expense.

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13. If we leased equipment rather than purchased equipment (i.e. portable air purifications systems) is that allowable for reimbursement?
Yes, this is an allowable expense.
14. If we purchased COVID tests for our students and faculty would those costs be covered?
Yes, COVID testing supplies would be an allowable expense.
15. Will you cover stipends and or salaries for additional staffing that was hired?
EANS funds may not be used to provide funds to non-public schools to cover payroll.
16. Would reimbursement made to Faculty/Staff for Home Internet be eligible?
Yes, this is an allowable expense.
17. Reimbursing staff for internet - what if the staff made the purchase before Feb 26, but we reimbursed them AFTER?
Expenses for allowable items that were incurred between March 13, 2020 and February 26, 2021 are eligible for reimbursement.
18. Is increased bandwidth an allowable expense?
Yes, this is an allowable expense.
19. Are contractual services (i.e. for professional development or student services) reimbursable?
No, contractual services for professional development or student services are not reimbursable.
20. Could you include zoom telehealth in your question about google classroom/google voice
Yes, this is an allowable expense.
21. Does this include Zoom licenses?
Yes, this is an allowable expense.
22. Does a contract to an outside company to monitor the additional technology equipment apply?
No, this is not allowable for reimbursement.
23. Are renovations to a new isolation room included?
Yes, this is an allowable expense.
24. If we leased Chromebooks but only made 2 lease payments, would we be able to apply those 2 payments since that was all that was made in the allowable period or could we apply for reimbursement for the total lease amount even though most would be future payments. The leasing company holds title and they revert back to the lease company at end of term.
Yes, this is an allowable expense.
25. What about online learning services such as Canvas, TurnItIn, Proctorio, that we would not have purchased in a face-to-face environment?
Yes, this is an allowable expense.

Public Control of Funds

1. For Capital expenditures or Educational Technology like laptops, does title of the asset remain with the school?
No, the title for the items that have been reimbursed transfers to the State.
2. So you are saying if we put the purchase of laptops for reimbursement the state will then own that equipment. Correct?
The State must retain title the equipment or materials purchased with EANS program funds.
3. A follow up to the comment about the state owning the laptops - what other types of things would that apply to?

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This would apply to any equipment and supplies included for reimbursement from the EANS program.

4. I did not hear, if we put laptops and Chromebooks for reimbursement at any point can the state take them?

Equipment and supplies purchased with EANS funds for students and teachers in a non-public school may be used for the authorized purposes of the EANS program during the period of performance (i.e., through September 30, 2023) or until the equipment and supplies are no longer needed for the purposes of the EANS program (see 34 C.F.R. § 76.661(b); 2 C.F.R. §§ 200.313(a)(1), (c)(1) and 200.314(a)).

In general, once equipment or supplies are no longer needed for purposes of the EANS program, an SEA must remove them from the private school. 34 C.F.R. § 76.661(d)(1). After equipment and supplies are no longer needed for the purposes of the EANS program, the SEA may continue to use the equipment or supplies in the non-public school to the extent they are needed for other allowable purposes under another federal education program, such as the ESEA or the Individuals with Disabilities Education Act (IDEA). In that case, the SEA must retain title to, and maintain administrative control over, the equipment and supplies or transfer title and control to another public agency such as an LEA providing equitable services under another federal education program.