

## **Emergency Assistance to Non-public Schools (EANS) Frequently Asked Questions**

### **A. THE APPLICATION PROCESS**

**1. Can I submit my application via mail or email?**

No. Only applications submitted through the online platform will be accepted.

**2. Will applicants be notified if there are portions of their application that do not meet the requirements prior to the deadline?**

Applications must be completed in full by the deadline. Late applications will not be accepted. Incomplete applications will be considered non-responsive and will not be scored.

**3. Can an EANS application include multiple categories or does it need to focus on only one spending need?**

EANS applications should list any items that the non-public school wishes to fund through the program. Non-public schools are not required to restrict their funding requests to only one program area.

**4. Can non-public schools receive reimbursement for items that are purchased moving forward?**

Newly acquired items under the EANS program can be purchased by either the Kentucky Department of Education (KDE) or the individual non-public school. Non-public schools may elect to purchase their own items and apply for a procedural reimbursement from KDE. These items should be placed in the “new services” section of the application.

**5. Items purchased to “Initiate and maintain education and support services or assistance for remote or hybrid learning or to address learning loss” are allowable under the EANS program but are not reimbursable. Can you clarify the difference?**

Purchases under this description made prior to the EANS program cannot be reimbursed. New purchases under this description can be funded moving forward. To provide clarity, the KDE has removed this description as an option on the reimbursement section of the EANS application.

**6. Does the application need to identify everything that a non-public school plans to fund through the EANS program?**

Yes, a completed application must include all items that a non-public school plans to fund through the EANS program and the cost of the items.

**7. My non-public school does not participate in the Title I program; therefore, families do not fill out free and reduced--price lunch applications. What other sources of low-income data are acceptable?**

The KDE will accept the following as proof of enrollment and low-income status: (1) free or reduced-price lunch data; (2) scholarship or financial assistance data; (3) E-Rate data; or (4) other relevant data, such as data the non-public school has provided to the state for purposes of state or local programs.

For non-public schools where such data are not readily available, and in order to avoid new or unnecessary data collections from non-public schools and families, the following are potential sources of estimates of the number of students from low-income families: a) data imputing the number of students from low-income families based on the American Community Survey (ACS) or the Small Area Income and Poverty Estimates (SAIPE) program by the U.S. Census Bureau [1]; or b) proportionality data: the number of students enrolled in a non-public school who reside in a Title I school attendance area multiplied by the percentage of public school students in that same attendance area who are from low-income families. If the non-public school has students who reside in more than one Title I school attendance area, multiple calculations would be necessary.

**8. Our non-public school was granted a waiver through the National School Lunch Program for 100% of our students to be fed for free. Prior to this waiver we were feeding approximately 50% free and reduced-price. Which number do we use to determine our low-income eligibility?**

Non-public schools that received National School Lunch Program waivers should not list all students as low-income eligible. Non-public schools should only count students who are considered low income as determined by other data sources.

**9. What school year should non-public schools use when determining the number of low-income students?**

Non-public schools should provide their low-income student count from the 2019-2020 school year.

**B. EZ VENDOR and W-9 FORMS**

*Note: Additional guidance relating to the completion of the EZ Vendor and W-9 forms is forthcoming.*

**1. Multiple non-public schools in our network share a tax ID number. How do we complete the EZ Vendor form?**

Each non-public school in the network should complete the EZ Vendor form with the network's tax ID. The remaining information should be specific to the non-public school (name, address, etc.) The applicant should upload the W-9 for their network.

**2. What is the procedure for submitting the EZ Vendor and W-9 forms early?**

The EZ Vendor and W-9 forms can both be completed early and submitted via email to: [kdefinmanvendreg@education.ky.gov](mailto:kdefinmanvendreg@education.ky.gov). This is an optional step that will expedite grant processing. The EZ Vendor and W-9 forms are required to be uploaded with your application regardless of whether or not you submit them to KDE early.

**3. Can we submit the EZ Vendor and W-9 forms as links to shared drives (such as Google Drive or OneDrive)?**

No. Files must be submitted as attachments when emailed to the department or uploaded to the application.

**4. If our non-public school already has a vendor number, are we required to apply for a new one?**

In the event the non-public school has a valid K-number designated for nutrition payments, non-public schools may be required to apply for a new vendor number. However, non-public schools must submit a completed EZ Vendor form with their application. Non-public schools may submit their previously approved EZ Vendor form. If a non-public school already has a vendor number for nutrition payments, please contact [Shara Wiley](#) prior to submitting your EANS paperwork.

**10. Should non-public schools submit W-9 forms for vendors that they intend to pay from the EANS program?**

No. Non-public schools are only required to submit their own W-9 form to KDE.

**C. GRANT MANAGEMENT**

**1. How often will reimbursement requests be processed?**

KDE will make every effort to process reimbursements as quickly as possible. However, many elements of the reimbursement process exist outside of the agency's control. Non-public schools should not request reimbursement for expenses if they cannot support the temporary budget implications. KDE can administer funds and make purchases on behalf of the non-public school to ease this situation.

**2. When will award notifications be distributed? (Updated 06/07/21)**

Schools were provided award notifications on 04/22/21. Due to lower than expected participation, the award was significantly higher than what schools budgeted on the application form. Schools have until June 15, 2021 to submit an amended budget. Schools that do not submit an amended budget will retain the original award amount.

KDE will review all amended budgets, a notification of the final award amount will be sent by July 15, 2021.

**3. Will non-public schools receive regular updates about their EANS spending and remaining balances? (Updated 06/07/21)**

The KDE Division of Budgets and Financial Management will post a monthly report reflecting the remaining balance of the awards provided to participating non-public schools. The report will be posted on the [KDE EANS](#) website. Expect the first summary report in July 2021.

**4. Items purchased under or reimbursed through the EANS program belong to the state, are they reflected on or depreciated as assets of our non-public school?**

No. Items acquired through the EANS program become property of the state and are reflected on the state's list of assets.

**D. HVAC UPGRADES**

**1. The application states that HVAC upgrades are allowable, yet not reimbursable. Can you explain this discrepancy?**

HVAC upgrades made prior to the EANS program cannot be reimbursed. New HVAC upgrades can be funded moving forward. To provide clarity, KDE has removed HVAC upgrades as an option on the reimbursement section of the EANS application.

**E. CAFETERIA EXPENSES**

**1. Are disposable cafeteria items, such as plates or utensils, allowable under the EANS program?**

Yes, disposable plates and utensils are allowable expenses under the EANS program because it supports sanitization efforts.

**2. Is cafeteria furniture an allowable expense under the EANS program?**

Yes, cafeteria furniture is an allowable expense under the EANS program because it supports social distancing.

**F. PRESCHOOL PROGRAMS**

**1. Do preschool programs qualify for the EANS program?**

A standalone private preschool does not qualify for the EANS program. A non-public school that includes multiple grade levels in addition to preschool does qualify for the EANS program. This non-public school should not include preschool students in its total student population numbers.

## **G. STAFFING**

*Note: In general, future staffing expenses are allowable under the EANS program if the work performed by the staff member supports an allowable expense category. As EANS funds are one-time funds, non-public schools should create a plan for the sustainability of these positions should they be necessary in the future.*

### **1. Is summer programming that addresses learning loss an allowable expense under the EANS program?**

Yes, summer programming is an allowable expense under the EANS program.

### **2. Is the hiring of additional staff (instructional aids) to address learning loss an allowable expense under the EANS program?**

Yes, hiring additional staff to address learning loss is an allowable expense under the EANS program.

### **3. Can the hiring of substitute teachers necessary to cover classes for teachers who were allowed to teach from home due to health issues an allowable expense under the EANS program?**

Yes, the hiring of substitute teachers is an allowable expense under the EANS program.

### **4. Is the hiring of additional custodial staff an allowable expense under the EANS program?**

Yes, hiring additional staff to support sanitization efforts is an allowable expense under the EANS program.

### **5. Can a non-public school hire an extra teacher for the 2021-2022 school year to support learning loss?**

Yes, future staffing expenses that support students experiencing learning loss are allowable under the EANS program.

### **6. Does the EANS program support staff benefits in addition to salaries?**

Yes. Non-public schools may apply for the complete cost of staffing, including salaries, benefits and taxes.

### **7. Can a non-public school hire a staff person to administer the EANS program?**

No. Administrative costs are not allowable under the EANS program.

## **H. PAYCHECK PROTECTION PROGRAM (PPP) LOANS**

- 1. Our non-public school received funds that were awarded to our network and distributed out to schools. Should we enter the total amount of PPP loan received by the network, or only the portion distributed to our non-public school?**

If a non-public school is applying for the EANS program independently of their network, the non-public school should only list the portion of PPP funds it received from the larger loan. If the network is applying for the EANS program on behalf of its schools, the network should list the entire PPP loan amount on the application.

- 2. If our non-public school did not receive a PPP loan prior to Dec. 27, 2020, can we use EANS funds to reimburse staff salaries?**

Staff salaries are reimbursable under the EANS program if the staffing needs align with a reimbursable category. For example, salaries for teaching staff that would have otherwise been required to facilitate a usual non-public school year are not reimbursable. Salaries for custodial staff that were required to improve sanitation efforts would be allowable.

## **I. TECHNOLOGY**

- 1. If we need to purchase technology for the current non-public school year because we still do not have adequate devices, does our purchase have to be done through a specific vendor or can we choose the vendor?**

Non-public schools may choose to purchase their own items and file for reimbursement or allow KDE to purchase items on their behalf. Items purchased by KDE on behalf of non-public schools must follow established state procurement laws and procedures.

- 2. Are non-public schools required to provide technology quotes before applying to the EANS program?**

Non-public schools are not required to provide technology quotes before applying to the EANS program. Non-public schools should do their due diligence to research and report approximate costs before applying.

- 3. Can we apply for reimbursement for technology purchased at the start of the non-public school year?**

Yes. Technology is allowable for reimbursement under the educational technology spending category.

- 4. Can KDE provide a list of approved vendors in advance?**

Statewide KDE master agreements can be found on the [KETS Product and Technical Standards](#) webpage.

**5. Will the state be reacquiring technology items purchased under the EANS program?**

Non-public schools will be allowed to use technology items purchased under the EANS program until they reach the end of their useful life or until they are no longer needed by the non-public school. KDE is required to reacquire and dispose of technology at the end of its useful life.

**J. NON-PUBLIC SCHOOL TUITION**

**1. Can a non-public school apply for reimbursement of lost tuition?**

No. Reimbursement for lost tuition is not an allowable expense under the EANS program.

**2. Can a tuition-based non-public school continue to collect special fees if they receive EANS funding?**

Yes. Tuition or fees do not impact EANS funding eligibility if the school is a non-profit, non-public school.

**3. Can additional tuition assistance offered due to COVID-19 be reimbursed?**

No. Tuition is not a reimbursable expense under the EANS program.

**K. MISCELLANEOUS**

**1. How far forward will non-public schools be able to plan for use of the EANS funds?**

Non-public schools should plan to use all their available EANS funds by Sept. 30, 2023.

**2. Our non-public school applied for FEMA support but has not heard back. Can we apply for the same items under the EANS program?**

Generally, FEMA does not allow for the reimbursement of expenses that can be covered under other federal programs. Non-public schools should not plan to request EANS funding for items requested on their FEMA application.

**3. If there is extra money allocated for the EANS program after all awards have been granted, will non-public schools be allowed the opportunity to apply again? (Updated 06/07/21)**

The EANS Final Notice of Assistance/Service will be sent to participating schools and posted to the EANS website once all the amended budgets have been approved (targeted for mid-July). For budgets that do not obligate the entire amount the school was

awarded, the Governor's Office will direct KDE on what to do with the unobligated funds. By the end of the program (September 30, 2023), KDE will also notify the Governor's Office of any obligated amounts not spent by participating schools.

**4. Can non-public schools be reimbursed for additional cleaning services required due to the COVID-19 pandemic? (Updated March 23, 2021)**

No. Non-public schools may request supplies for cleaning and sanitization but may not be reimbursed for cleaning services provided by a vendor.

**5. How will the EANS fund be distributed?**

Non-public schools will receive a base per-pupil amount based on their 2019-2020 total enrollment. Non-public schools also will receive an additional bonus for each student identified on the application as low-income.

**5. Do items funded through the EANS program require state property tags? (Updated 06/07/21)**

Both the reimbursement and procurement process impact inventory. An asset will be tracked through KDE's inventory process if the asset meets the \$500 threshold amount or if it is technology related item that KDE determines must be tracked. If a school requests reimbursement for an asset that meets inventory requirements, the school will be sent an asset tag for the item and an inventory form when the reimbursement is processed. The school's designated Asset Custodian will affix the inventory tag to the item. The Asset Custodian will also complete the inventory form and return it to KDE. The form will capture the tag number and identifying information for the asset. For assets that KDE will procure on behalf of the school, KDE will send the asset tags and the inventory form to the school's Asset Custodian when KDE places the order for the goods. The goods will be shipped directly to the school. Upon receipt of the items, the Asset Custodian will affix the asset tag to the item, add the item to the accompanying inventory form and return the form to KDE. Whether the item is a reimbursement or new purchase, the school's Asset Custodian will affix the inventory tag, update the inventory form, and return the updated inventory form to KDE. Annually, the school's Asset Custodian will provide the school's inventory as recorded at KDE to verify that the tagged assets remain in the possession of the school.

**8. Can the EANS program be used to provide counseling support to students experiencing emotional trauma? (Updated 06/07/21)**

Social and Emotional Learning activities do not meet the intent of the EANS program.