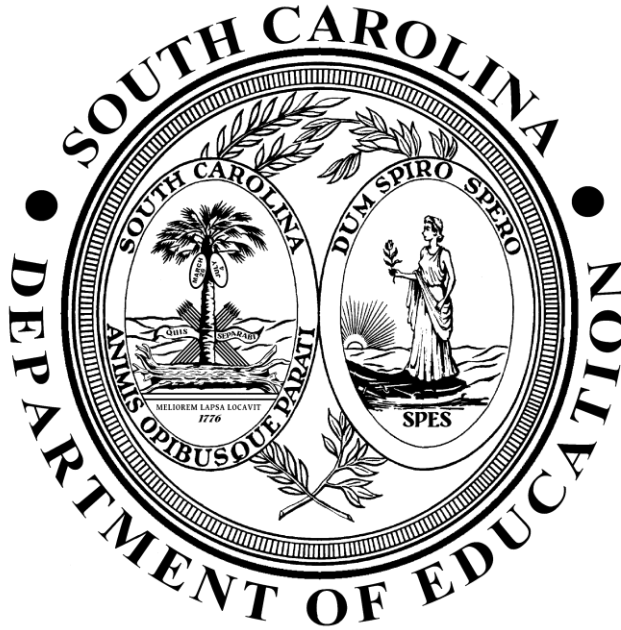


**STATE OF SOUTH CAROLINA**  
**DEPARTMENT OF EDUCATION**

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*STATE SUPERINTENDENT OF EDUCATION*



## Emergency Assistance to Non-Public Schools (EANS) Program FAQs

Coronavirus Response and Relief Supplemental Appropriations Act, 2021  
Public Law 116-260

March 12, 2021

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## **PURPOSE:**

The purpose of this document is to provide non-regulatory and non-statutory guidance to local non-profit, non-public schools for the Emergency Assistance to Non-Public Schools (EANS) program, as authorized by the Coronavirus Response and Relief Supplemental Appropriations Act, 2021, Public Law 116-260.

Answers are based on available information provided by the questions posed. Specific or nuances to these questions should be submitted to [SCEANS@ed.sc.gov](mailto:SCEANS@ed.sc.gov).

## **ALLOWABLE ACTIVITIES**

### **1. Would the increase in substitutes due to COVID-19 be reimbursable?**

No, schools may not be reimbursed for staff salaries or fringe costs.

### **2. Would nursing and counseling salaries be an allowable expense?**

Staff salaries and fringe benefits are not covered under the EANS program. Nursing services may be an allowable expense if they are provided by a third-party provider and are being utilized for purposes of monitoring and suppressing COVID-19. Future counseling services may be an allowable expense if provided by a third-party provider and are being utilized for purposes of providing support services for remote or hybrid learning or to address learning loss due to the COVID-19 pandemic.

### **3. Would the costs to lease another bus due to COVID-19 be an allowable expense?**

The actual costs of transportation incurred for these purposes would be an allowable expense, but the costs for the bus itself (i.e. any loan or lease payments) would not, nor would costs of any staff time/salaries. The transportation costs could be calculated utilizing a mileage rate, or the actual fuel costs incurred, but the basis must be consistent.

### **4. Would new leasing costs for portable classrooms to allow for more social distancing be an allowable expense?**

Yes, leases for portable classrooms would be an allowable expense. If the expense is a reimbursement, the lease must have been established after March 13, 2020 and must be in response to the COVID-19 pandemic. If this is a future expense, the lease should be provided prior to signature for approval by the SCDE. Additional considerations must be made, including but not limited to Americans with Disabilities Act (ADA) compliance, State Fire Marshall and school facility requirements, and potential conflicts of interest. The EANS funds can only be used to pay for costs through September 30, 2023.

Setup costs may also be included; however, insurance costs, repairs, and other maintenance costs would not be covered under the EANS program.

### **5. Can these funds be used to cover costs associated with converting one classroom into two, or vice versa, for purposes of social distancing?**

Only costs associated with temporary barriers may be allowable under the EANS program. The removal of a physical wall would not be a covered expense. The addition of a permanent, physical wall would also not be covered. However, a temporary or portable barrier used to separate a classroom for social distancing purposes may be covered.

**6. Would air filtration filters be reimbursable?**

No, only reimbursement of costs related to the purchase of the actual portable air purifiers would be allowable. However, purchases of these filters going forward would be allowable as future expenses.

**7. Can these funds be used for leasing tablets?**

Yes, leasing costs for tablets would be allowable so long as the expense is related to the COVID-19 pandemic. If the expense is a reimbursement, the lease must have been established after March 13, 2020. If this is a future expense, the private school may enter into a lease and request prospective reimbursement of allowable costs. The EANS funds can only be used to pay for costs through September 30, 2023.

**8. Would the costs associated with a third-party cleaning service be an allowable expense?**

No, except for the actual costs of the cleaning supplies. Although these expenses may have been incurred due to COVID-19, cleaning services do not fit into any of the 12 allowable categories under the EANS program.

**9. Do web- or phone-based applications qualify as an educational technology expense?**

Apps, programs, and other licensed products may be allowable educational technology expenses, so long as they were purchased due to the COVID-19 pandemic, the expenses are reasonable and necessary, and the purpose of the technology is to deliver already existing instructional plans. Any consumable materials or supplies included with the purchase of this technology may also be included but would not require transfer of ownership or recurring inventory.

If the purpose of the technology is to redevelop instructional plans, these costs would fall under Category #9. Such expenses are not reimbursable under EANS, and any future purchases would have to be coordinated through Catapult Learning.

If the purpose of the technology is to provide health services – such as screening or tele-med services – these costs would fall under Category #7. Reimbursements of this type of expense are allowable. For future services, schools with a current agreement or contract with a provider of this type of technology may continue to utilize those services; however, those without a current agreement with a provider will have to utilize Catapult Learning.

## **APPLICATION PROCESS**

**1. Can you save an application and finish it on a later date?**

No, applications are not able to be saved; they must be completed and submitted all at one time.

**2. Will an entire application be approved or denied?**

Applications may be approved in full or in part or denied in full or in part. Determinations will be made based on whether the requests in an application are allowable, reasonable, and necessary.

**3. Where do we provide links to the CDC for Category #6?**

Any link to the CDC for purposes of Category #6 may be submitted as a word document in Part E: Supporting Documentation.

**4. What is considered a future service/purchase, and what is considered a reimbursement?**

In general, future services or purchases would refer to those which are made after the application is submitted to the SCDE, and reimbursements refer to expenses which have been incurred as of the date of submission. If a contractual obligation exists at the time of application, the associated expense should be included as a reimbursement, whether it has been paid yet or not. If there is no such agreement or contract in place, the expense should be reflected as a future service, except for leases of computers or educational technology (See Question 7 under Allowable Activities). This applies to leases that are in effect at the time of application – all payments under the terms of the lease may be categorized as a reimbursement, rather than split between payments made prior to application and payments not yet made at the time of application.

We understand some materials or supplies may be purchased between the submission of the application and the processing of funds. If any items transition from a “future expense” to a “reimbursement” during this period, we will work with the private school to adjust the spending plan.

**5. Although our school has never applied for a Payroll Protection Program (PPP) loan, the umbrella organization under which we operate has applied for the PPP first draw and second draw. Are we eligible to apply for EANS funds?**

For the private school to still be eligible for EANS funds, two items will have to be addressed. First, any PPP funds that the parent organization applied for and received on or after December 27, 2020 must not have been provided to the private school. Second, any PPP funds that the parent organization applied for and received prior to December 27, 2020 may have been provided to the private school, but the private school must attest that any of these funds will not be used to cover the same costs as being applied for under the EANS program.

**6. Can reimbursement requests be applied for on a later date, after March 31<sup>st</sup>?**

No, the application should list all requests for reimbursement or payment of anticipated future expenses at the time of submission. Applications may not be edited on a later date to include costs that were left out. Although reimbursements for expenses made after March 13, 2020 may be claimed through August 15, 2021, the SCDE must know how much to expect in reimbursement expenses to provide a final award amount. If approved, a school would then

have until August 15, 2021 to make the reimbursement claim through our third-party vendor for expenses from March 13, 2020 to June 30, 2021.

## **PROCUREMENT AND OWNERSHIP**

### **1. Will anything that we ask to be reimbursed become property of the state?**

Any single item with a value of \$2,500 or more, or any piece of technological equipment of any value would be categorized as an asset, meaning ownership must be transferred to the SCDE during the EANS program period (until September 30, 2023). Any single, non-technological item under \$2,500 may be reimbursed without requiring a transfer of ownership.

### **2. How will the state handle disposition of electronic equipment?**

The SCDE will have to follow state disposition guidelines. The value of each individual asset would be monitored through the end of the EANS program period. If the value is determined to be negligible, we may have an option for the devices to be sold or donated to the private school. Further details will be provided in a Technical Assistance webinar that the SCDE will hold in early April once all applications have been received.

### **3. For any technology device that we submit and that the state will then own, when will the inventory have to take place or can it be at the school's discretion?**

Details on this are still being discussed, but there will likely be a 30-day window during the summer months for inventory, so the school has time to receive back all devices from students. The SCDE will hold another Technical Assistance webinar discussing the procurement, tracking, and inventory processes in April, after all applications have been received.

### **4. For any technology device that we submit and that the state will then own, what happens if the device is lost/stolen?**

The SCDE has a form [located here](#) which can be used in such instances. Further details will be provided in a Technical Assistance webinar that the SCDE will hold in early April once all applications have been received.

### **5. At what point do we need to obtain quotes?**

If the aggregate cost of the future purchase of supplies/materials/equipment is below or equal to \$10,000, one quote is necessary. If the aggregate cost exceeds \$10,000, three quotes must be obtained from qualified sources.

Quotes do not need to be provided with the initial application, but they will be required for approval when a claim is submitted. Further details will be provided in a Technical Assistance webinar that the SCDE will hold in early April once all applications have been received.

**6. Our school belongs to an association. Can the association obtain quotes from vendors on our behalf?**

Yes, they may. In fact, it may be beneficial for the association to do so if they have any existing relationships or if multiple schools require the same supplies, devices, and services, and a group bid may provide better prices. The association would have to provide the private schools with the three quotes obtained for their records. The individual schools must then supply those three quotes and their own invoice for the product or service when submitting a claim for approval.

**7. Are items such as speakers or microphones considered a technology device?**

Yes, speakers and microphones are considered an electronic device and would require transfer of ownership to the SCDE if EANS funds are used to cover the costs.

## **GENERAL INFORMATION**

**1. Where can I find a copy of the Technical Assistance session from February 24, 2021?**

The recorded webinar, along with the presentation slides, may be found on our [SC EANS website](#), under the section titled EANS Application and Materials.

**2. Where can I find more information regarding the services available through Catapult Learning?**

To learn more about Catapult Learning, the services they provide, and how they may be able to help address Learning Loss throughout the EANS funding period, please visit [their website](#) or email [SCEANS@catapultlearning.com](mailto:SCEANS@catapultlearning.com).