

Emergency Assistance for Nonpublic Schools (EANS)

Eligible Expenses

The purpose of this document is to provide further technical assistance on Minnesota's Emergency Assistance for Nonpublic Schools (EANS) Funding. The US Department of Education has also released a <u>Frequently Asked Questions</u> document, which is referenced for each item.

The Minnesota Department of Education (MDE) has contracted with the Metro Educational Service Cooperative (Metro ECSU) of the Minnesota Service Cooperative (MSC) to administer Minnesota's EANS program. Metro ECSU will manage all reimbursements and disbursements of EANS funds to nonpublic schools. Those items requiring service contracts will have contracts established with and by their local service cooperative on behalf of the nonpublic school.

Please note that an invoice and proof of payment will be required to submit a claim for a reimbursement, and MDE will hold title to the materials, equipment and property purchased with EANS funding. Schools will be required to provide documentation that any purchases made with EANS funds were in direct response to the COVID crisis in the event that they are audited. EANS states that if a cost for materials, equipment or property is reimbursed, the item will no longer be owned by the 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. All services or assistance provided by EANS funds, including any materials, equipment and any other items used to provide such services or assistance, are limited to secular, neutral, and non-ideological purposes.

To request reimbursement or a direct service, nonpublic schools who have successfully applied for EANS funding can access the appropriate form on Metro ECSU EANS Program website.

This list of eligible expenses is not an exhaustive list of what can be an eligible expense and will be updated periodically. This is a living document and schools are encouraged to check back frequently for clearly marked updates.

Item SANITATION SUPPLIES	Category	Direct Service	Future Reim- bursement		USED FAQ Reference	Justification and Notes
Vendor to clean facilities	Supplies to sanitize, disinfect, and clean school facilities	No	No	No	D-3	March 19, 2021 guidance from the U.S. Department of Education clarifies that the law allows for supplies to sanitize, disinfect, and clean school facilities, but that authority does not extend to contracting with a vendor to perform cleaning.
UV lights	Supplies to sanitize, disinfect, and clean school facilities	No	No	No	D-1	UV lights are not currently on List N of products identified by the Environmental Protection Agency to effectively kill the virus that causes COVID-19. The effectiveness of these tools has not been fully established.
Electrostatic sprayer	Supplies to sanitize, disinfect, and clean school facilities	Yes	Yes	Yes	D-1	This is allowable, but the CDC cautions regarding use of wide-area electrostatic spraying. CDC guidance indicates that washing daily with soap and water, or disinfecting with items on the Environmental Protection Agency's List N of products that effectively kill the virus that causes COVID-19 is sufficient to maintain school health and safety.
VENTILATION SYSTEM IN	IPROVEMENTS					
Custom UV systems	Improving ventilation systems, including windows or portable air purification systems	Yes	No	NO	D-1; E-2	Ultraviolet germicidal irradiation, or UVGI, is the use of ultraviolet (UV) energy to kill viral, bacterial, and fungal organisms. (https://www.cdc.gov/coronavirus/2019-ncov/community/ventilation/UVGI.html). The systems would likely be considered a capital improvement and would thus not be allowed, but the service to install the systems could be covered by EANS funds, through direct provision only.
HEPA filters	Improving ventilation systems, including windows or portable air purification systems	Yes	No	No	D-8	Improvements to ventilation systems (except portable air purification systems) are not reimbursable.
Furnaces		No	No	No	D-8	Improvements to ventilation systems (except portable air purification systems) are not reimbursable. Additionally, this would be a capital improvement. The service to install a furnace purchased with private dollars would be allowable. Published May 24, 2021

ltem	Category	Direct Service	Future Reimbursement	Past Reim- bursement	USED FAQ Reference	Justification and Notes
Windows	Improving ventilation systems, including windows or portable air purification systems	No	No	No	D-8	Improvements to ventilation systems (including windows), except portable air purification systems, are not reimbursable. Additionally, this would be a capital improvement, which is not allowed. However, service to install new windows (that are purchased with private funds by the school) or to repair existing windows may be eligible.
Air purifiers	Improving ventilation systems, including windows or portable air purification systems	Yes	No	*Yes	D-8	*Reimbursements are only allowable for portable air purification systems. Improvements to ventilation systems, except for portable air purification systems, are not allowable as either past or future reimbursement, and any system that would be considered a capital improvement is not allowed, so in most cases the air purification system does have to be portable to be an allowable direct purchase or reimbursement.
New ventilation system	Improving ventilation systems, including windows or portable air purification systems	No	No	No	E-2	While the law allows services or assistance to improve ventilation systems, capital improvements are not allowable. As such, an allowable expense in this area would be limited to services to fix and/or improve ventilation systems, but not to purchase a new system.
Air conditioners (purchase of)	Improving ventilation systems, including windows or portable air purification systems	No	No	No	D-1; D-8	While the law allows services or assistance to improve ventilation systems, capital improvements are not allowable. As such, an allowable expense in this area would be limited to services to fix and/or improve ventilation systems, but not to purchase a new system. Therefore, EANS funds may be used to repair existing air conditioners or install new units, but not purchase the air conditioners.
Services to install ventilation systems, including windows or portable air purification systems	Improving ventilation systems, including windows or portable air purification systems	Yes	No*	No*	D-1; D-8; E- 2	Services related to improvements to or installation of ventilation systems are allowable. These have to be directly provided via service contract through the MN Service Cooperative. *Reimbursements (past or future) are allowable only for portable air purification systems.

ltem	Category	Direct Service	Future Reim- bursement	Past Reim- bursement	USED FAQ Reference	Justification and Notes
TRAINING/PROFESSIONAL	. DEVELOPMENT					
Reimbursement for existing staffing who have been directly addressing on safe school environments (nursing staff, janitorial staff, technology support)	Training and professional development for staff on sanitation, the use of PPE, and minimizing the spread of infectious diseases	N/A	No	No	D-8	In general, staffing is not covered by EANS, even if those staff were directly involved in creating safe school environments. EANS focuses on supplies to sanitize, disinfect, and clean school facilities; training on sanitization, use of PPE, and minimizing spread of infection disease (but this is not reimbursable; it's only available as a direct service); and other materials, supplies, or equipment recommended by the CDC for reopening and operation of school facilities to effectively maintain health and safety.
PHYSICAL BARRIERS			•		•	
Gym curtain to divide space	Physical barriers to facilitate social distancing	Yes	Yes	Yes	D-1	Okay to repair or replace a gym curtain to provide additional space due to COVID-19
Temporary walls to divide rooms		Yes	Yes	Yes	D-2	Okay to place a temporary wall to provide additional space due to COVID-20, provided this is not a capital improvement.
OTHER CDC-RECOMMEND	ED SUPPLIES					
Desks, tables	Other materials, supplies, or equipment recommended by the CDC for reopening and operation of school facilities to effectively maintain health and safety		Yes	Yes	D-1	Purchases of desks or tables is allowable when the additional desks or tables facilitate recommended social distancing guidelines (e.g., when a classroom currently has tables that are not large enough to facilitate social distancing and desks could replace the tables). MDE will hold the title for the desks or tables.

ltem	Category	Direct Service	Future Reim- bursement	Past Reim- bursement	USED FAQ Reference	Justification and Notes
Lunch program supplies	Other materials, supplies, or equipment recommended by the CDC for reopening and operation of school facilities to effectively maintain health and safety	Yes	Yes	Yes	D-1	Lunch services and meals are not allowable, but the CDC does recommend disposable food service items as one type of supply that can help ensure schools are effectively maintaining health and safety. EANS funds may be used to purchase disposable food service items.
No-touch drinking fountains	Other materials, supplies, or equipment recommended by the CDC for reopening and operation of school facilities to effectively maintain health and safety	Yes	No	No	D-1; E-2	CDC recommendations for reopening and operation of school facilities to effectively maintain health and safety do advise staff to consider no-touch drinking fountains. However, these would be considered capital improvements, which are not allowed. MDE is allowing the service to install no-touch drinking fountains, but not the fountains themselves.
Automatic faucets for bathroom sinks	Other materials, supplies, or equipment recommended by the CDC for reopening and operation of school facilities to effectively maintain health and safety	Yes	Yes	Yes	D-1; E-2	CDC recommendations for reopening and operation of school facilities to effectively maintain health and safety do advise staff to consider automatic water faucets in high-use areas. However, these would be considered capital improvements, which are not allowed. MDE is allowing the service to install automatic faucets for bathroom sinks, but not the faucets themselves.

ltem	Catagory	Direct Service	Future Reim- bursement	Past Reim- bursement	USED FAQ Reference	Justification and Notes
Equipment for leased	Category Other materials,	Yes	Yes	Yes	D-1	Purchasing materials, supplies, and/or equipment recommended
space	supplies, or equipment recommended by the CDC for reopening and operation of school facilities to effectively maintain health and safety		Tes	163	D-1	by the CDC for reopening and operation of school facilities - including operation in a leased facility or space - is an allowed use of EANS funds.
Fans	Other materials, supplies, or equipment recommended by the CDC for reopening and operation of school facilities to effectively maintain health and safety	Yes	Yes	Yes	D-1	We are not considering fans as part of ventilation systems, but rather part of other supplies to effectively maintain health and safety of schools. CDC recommendations offer this strategy: use a window fan, placed safely and securely in a window, to exhaust room air to the outdoors. This will help draw outdoor air into the room via other open windows and doors without generating strong room air currents. Similar results can be established in larger facilities using other fan systems, such as gable fans and roof ventilators. (https://www.cdc.gov/coronavirus/2019-ncov/community/ventilation.html)
Desk shields	Other materials, supplies, or equipment recommended by the CDC for reopening and operation of school facilities to effectively maintain health and safety	No	No	Yes	D-1	As of March 19, 2021, the CDC is no longer recommending the use of physical barriers in classrooms. Therefore, desk shields would be eligible for reimbursement of a purchase prior to March 19, 2021, but would not be eligible after that for reimbursement or direct purchase.

ltem	Category	Service	Future Reim- bursement	bursement	USED FAQ Reference	Justification and Notes
Tables and chairs	Other materials, supplies, or equipment recommended by the CDC for reopening and operation of school facilities to effectively maintain health and safety		Yes	Yes	D-1	Purchasing and reimbursing purchases of tables and chairs is allowed when the table and chairs enable recommended social distancing measure (noting that physical distance recommendations were amended from 6 to 3 feet on March 19, 2021).
CORONAVIRUS TESTING	ì					
Nursing staff	Expanding capacity to administer coronavirus testing to effectively monitor and suppress the virus	Yes	No	No	D-1; D-6	Staff must be employed directly by the MN Service Cooperative, but are allowable to expand capacity to administer testing, and to effectively monitor and suppress the virus.
TECHNOLOGY				•	•	
Internet connectivity	Educational technology (including hardware, software, connectivity, assistive technology, and adaptive equipment) to assist students, educators, and other staff with remote or hybrid learning	Yes	Yes	Yes	D-1	Devices to enable or improve internet connectivity (e.g., wireless hotspots) that are not capital improvements are allowable expenses.

ltem	Category	Direct Service	Future Reim- bursement	Past Reim- bursement	USED FAQ Reference	Justification and Notes
Chromebooks/laptops/ta blets	Educational technology (including hardware, software, connectivity, assistive technology, and adaptive equipment) to assist students, educators, and other staff with remote or hybrid learning	Yes	Yes	Yes	D-1	The purchase of any type of laptop for students or staff involved in remote or hybrid learning is an allowable expense. MDE will hold the title for laptops.
Interactive TVs	Educational technology (including hardware, software, connectivity, assistive technology, and adaptive equipment) to assist students, educators, and other staff with remote or hybrid learning	Yes	Yes	Yes	D-1	Interactive TVs are allowable as educational technology to support remote or hybrid learning. MDE will hold the title for interactive TVs.

ltem	Category	Direct Service	Future Reim- bursement	Past Reim- bursement	USED FAQ Reference	Justification and Notes
Wireless access points	Educational technology (including hardware, software, connectivity, assistive technology, and adaptive equipment) to assist students, educators, and other staff with remote or hybrid learning	Yes	Yes	Yes	D-1	Wireless access points that are not capital improvements would be allowable. MDE would hold the title for wireless access points.
Wireless system upgrades	Educational technology (including hardware, software, connectivity, assistive technology, and adaptive equipment) to assist students, educators, and other staff with remote or hybrid learning	Yes	Yes	Yes	USED link	Wireless system upgrades that are not capital improvements would be allowable in EANS as a purchase related to educational technology (and, specifically, connectivity). MDE would hold public title to relevant items.

ltem	Category	Direct Service	Future Reimbursement	Past Reim- bursement	USED FAQ Reference	Justification and Notes
Online subscriptions for remote learning	Educational technology (including hardware, software, connectivity, assistive technology, and adaptive equipment) to assist students, educators, and other staff with remote or hybrid learning	Yes	Yes	Yes	D-1	This is limited to subscriptions to support remote learning. Online purchases characterized in support of initiating and maintaining education and support services or assistance for remote or hybrid learning or to address learning loss, or to redeveloping instructional plans, including curriculum development - are not reimbursable. Such services are limited to direct provision through the MN Service Cooperative.
Student information system	Educational technology (including hardware, software, connectivity, assistive technology, and adaptive equipment) to assist students, educators, and other staff with remote or hybrid learning	No	No	No	D-1	While a student information system can be helpful for a school generally, it does not directly address disruptions from COVID-19.

ltem	Category	Direct Service	Future Reim- bursement	Past Reim- bursement	USED FAQ Reference	Justification and Notes
Bigger firewall	Educational technology (including hardware, software, connectivity, assistive technology, and adaptive equipment) to assist students, educators, and other staff with remote or hybrid learning	Yes	Yes	Yes	D-1	This would be allowable as educational technology to support remote or hybrid learning, and specifically to accommodate higher speed internet and additional devices (connectivity)
New cabling	Educational technology (including hardware, software, connectivity, assistive technology, and adaptive equipment) to assist students, educators, and other staff with remote or hybrid learning	No	No	No	E-2	Cabling would be considered a capital expense which is not allowable per USED guidance. Service to install cabling will be allowed under the category of educational technology to improve connectivity.

ltem	Category	Direct Service	Future Reimbursement	Past Reim- bursement	USED FAQ Reference	Justification and Notes
New server	Educational technology (including hardware, software, connectivity, assistive technology, and adaptive equipment) to assist students, educators, and other staff with remote or hybrid learning	Yes	Yes	Yes	D-1	A server would be allowable if not a capital expense. MDE would have to hold public title to the server.
Protective software	Educational technology (including hardware, software, connectivity, assistive technology, and adaptive equipment) to assist students, educators, and other staff with remote or hybrid learning	Yes	Yes	Yes	D-1	Protective software mitigates possible connectivity and access issues and would thus be allowable as an expense for educational technology.

ltem	Category	Direct Service	Future Reimbursement	Past Reim- bursement	USED FAQ Reference	Justification and Notes
Smartboards	Educational technology (including hardware, software, connectivity, assistive technology, and adaptive equipment) to assist students, educators, and other staff with remote or hybrid learning	Yes	Yes	Yes	D-1	Smartboards purchased/reimbursed with EANS funds would have to be in public title held by MDE. Services to install the Smartboard is considered part of the purchase, but not subject to public title.
Smartboard installation	Educational technology (including hardware, software, connectivity, assistive technology, and adaptive equipment) to assist students, educators, and other staff with remote or hybrid learning	Yes	Yes	Yes	D-1	Purchasing a Smartboard with installation would make the item itself useless. We are considering one-time installation of educational technology part of the purchase of the technology.

ltem	Category	Service	Future Reim- bursement	bursement	USED FAQ Reference	Justification and Notes
Document Cameras	Educational technology (including hardware, software, connectivity, assistive technology, and adaptive equipment) to assist students, educators, and other staff with remote or hybrid learning	Yes	Yes	Yes	D-1	Allowable to support remote or hybrid learning. Title retained by MDE.
Setup/installation of technology	Educational technology (including hardware, software, connectivity, assistive technology, and adaptive equipment) to assist students, educators, and other staff with remote or hybrid learning	Yes	No	Yes*	D-1; D-8	Education technology is limited to purchases of items (hardware, software, connectivity, assistive technology, and adaptive equipment). One-time setup of technology that was part of the purchase of the technology may be covered (and reimbursed) by EANS funds. For future purchases, initiating or maintaining technology services that provide support for remote or hybrid learning falls under a category that is only eligible for direct provision of services, not future reimbursement.
INSTRUCTIONAL PLAN R	EDEVELOPMENT					
Curriculum	Redeveloping instructional plans, including curriculum development, for remote or hybrid learning, or to address learning loss	Yes	No	No	D-1; D-8	Adjusting or updating curriculum for remote or hybrid learning or to address learning loss is allowed only as a direct service.

ltem	Category	Direct Service	Future Reimbursement	Past Reim- bursement	USED FAQ Reference	Justification and Notes
SITE/SPACE LEASES	category	Service	barsement	barsement	Reference	sustification and Notes
	Leasing sites or spaces to ensure safe social distancing	No	No	No	E-2	Repairs that constitute capital improvements are not allowable expenses in EANS.
Additional space	Leasing sites or spaces to ensure safe social distancing	Yes	No	Yes	E-3	Leasing of additional space to provide sufficient social distancing is an allowable expense. Future leasing contracts must be adminstered through the MN Service Cooperative.
TRANSPORTATION			•		•	
1	Reasonable transportation costs	Yes	Yes	Yes	D-1	This is a reasonable transportation cost.
EDUCATION/SUPPORT SEF	RVICES					
Salary for reading interventionist	Initiating and maintaining education and support services or assistance for remote or hybrid learning or to address learning loss	Yes	No	No	D-6; D-8	Through direct provision only. Any staff hired must be under direct supervision of the public agency (MN Service Cooperative) providing services and can be documented as the school's direct response to the COVID crisis.
Instructional staff	Initiating and maintaining education and support services or assistance for remote or hybrid learning or to address learning loss	Yes	No	No	D-8	Through direct provision only. Any staff hired must be under direct supervision of the public agency (MN Service Cooperative) providing services and can be documented as the school's direct response to the COVID crisis.

Item	Category	Direct Service	Future Reim- bursement	bursement	USED FAQ Reference	Justification and Notes
Administrative staff (for supervision of program and facilities)	Initiating and maintaining education and support services or assistance for remote or hybrid learning or to address learning loss	Yes	No	No	D-8	Through direct provision only. Any staff hired must be under direct supervision of the public agency (MN Service Cooperative) providing services and can be documented as the school's direct response to the COVID crisis.
Academic assessments to measure learning loss	Initiating and maintaining education and support services or assistance for remote or hybrid learning or to address learning loss	Yes	No	No	D-1; D-8	Providing support services that address learning loss requires an understanding of that loss and current skills and abilities. This is not a reimbursable expense but may be provided directly through a service contract with the MN Service Cooperative.
Summer school program	Initiating and maintaining education and support services or assistance for remote or hybrid learning or to address learning loss	Yes	No	No	D-1; D-8	The program should prioritize students who have experienced learning loss due to the COVID-19 health crisis; if room remains, students who have not experienced learning loss may participate as well as long as additional staff are not needed.
Planning for summer programming	Initiating and maintaining education and support services or assistance for remote or hybrid learning or to address learning loss	Yes	No	No	D-1; D-8	This expense is allowable as a direct service provided through the MN Service Cooperative. This would cover the event of planning, not staff time, which is not allowable unless staff are directly hired and supervised by the MN Service Cooperative.

		Direct	Future Reim-	Past Reim-	USED FAQ	
Item	Category	Service	bursement	bursement	Reference	Justification and Notes
Paying teachers to help after school or in the summer	Initiating and maintaining education and support services or assistance for remote or hybrid learning or to address learning loss	Yes	No	No	D-1; D-6; D- 8	This is allowable only if the staff are directly employed by the MN Service Cooperative. This is not a reimbursable expense.
Online textbooks	Initiating and maintaining education and support services or assistance for remote or hybrid learning or to address learning loss	Yes	No	No	D-8	Online textbooks fall under the category of education and support services or assistance for remote or hybrid learning which is non-reimbursable, but eligible for direct provision through the MN Service Cooperative.
Mental health supports	Initiating and maintaining education and support services or assistance for remote or hybrid learning or to address learning loss	Yes	No	No	D-1; D-8	Initiating and maintaining education and support services may take into account the mental health needs of both students and staff to help address the impact of COVID-19 on the school community, to best address learning loss, and to support the transition or adjustments to remote or hybrid learning. This is only available as a direct service, but may include both resources to assist with supports and staff (employed by the MN Service Cooperative).
Interventionists to address learning loss	Initiating and maintaining education and support services or assistance for remote or hybrid learning or to address learning loss	Yes	No	No	D-1	Addressing learning loss via direct service is allowable in EANS. Interventionists must be directly employed by MN Service Cooperative.

ltem	Category	Direct Service	Future Reim- bursement	Past Reim- bursement	USED FAQ Reference	Justification and Notes
Paying teacher to attend PD sessions to address learning loss	Initiating and maintaining education and support services or assistance for remote or hybrid learning or to address learning loss	No	No	No	D-6	Paying for teachers to attend professional development is the same as paying for staff time, and EANS funds may not be used to pay salaries of non-public school teachers or other staff. EANS funds may be used for direct provision of the professional learning itself (if for an allowable topic), but not for the staff time to attend.
Books for intervention support	Initiating and maintaining education and support services or assistance for remote or hybrid learning or to address learning loss	Yes	No	No	D-1; D-8	Purchasing books to address learning loss (through interventionist services, afterschool programming, and/or summer school)
Items used for religious purposes	N/A	No	No	No	B-2	All services or assistance provided by EANS funds, including any materials, equipment, and any other items used to provide such services or assistance, are limited to secular, neutral, and non-ideological purposes.