



New Covid-19 Relief to Private Schools CRRSA January 12, 2021

The **Coronavirus Response and Relief Supplemental Appropriations Act (CRRSA)**, the latest Covid-19 relief bill, includes specific funding for private schools struggling financially due to Covid-19. Last Friday, AACCS staff participated in a meeting with Department of Education (ED) staff to discuss how Christian schools may benefit from this new program.

Of the \$81.88 billion appropriated for education, the CRRSA provides \$4.05 billion to supplement the GEER program started under the CARES Act. Within the renewed GEER there are two programs. First, the bill provides \$2.75 billion for the **Emergency Assistance to Non-Public Schools (EANS)** program. This program is set aside solely for the use of private schools. Second, the bill provides \$1.3 billion to supplement the GEER fund (GEER 2). The GEER 2 funds do not require equitable services to private schools because the EANS program specifically funds private schools. Because EANS is a new program, your state-level engagement is vital to ensure that EANS benefits Christian schools in your state.

Since this is a federal program to the states, a governor needs to submit a form to ED by **February 8, 2021**, in order to receive funds. The State Educational Agency (SEA) has thirty days after receiving the EANS funds to distribute applications to private schools. After a private school applies for the EANS, the state has six months to obligate the money for that school's qualified expenses. However, the private school community is concerned that a gray area in the bill allows a state to obligate the money within six months but withhold the actual payment of the funds until after six months, at which point the money automatically goes into a supplemental fund for the governor's use. This flaw in the program could function as an incentive for states to slow down the process so that obligated EANS funds convert to the flexible supplemental fund before the money reaches private schools.

ED is feverishly working to release guidance on the EANS that can help private schools navigate this new funding opportunity. Until that time, we cannot know all the details about how the program will work. However, as we wait for the guidance, **there are steps you can take** in your state to help secure EANS funds for Christian schools in need of financial aid.

STEPS TO TAKE FOR SCHOOLS WISHING TO PARTICIPATE

1. **Become familiar with ED resources on the EANS program.** This White Paper summarizes the EANS and how you can get involved, but ED has provided several very helpful resources on its [website](#) to help you navigate this new program. Below are links to these resources:
 - [Notice](#)
 - [EANS Allocation Table per State](#)
 - [Fact Sheet](#)
 - [Certification and Agreement](#)
2. **Contact your governor's office and encourage him or her to participate in the Emergency Assistance to Non-Public Schools program.** Because a state is not required to participate in the program, your voice on behalf of your schools is vital to providing this funding opportunity for Christian schools in your state. You should emphasize that Christian schools should receive reimbursements within the six-month window. Below is a link to a letter ED has provided as guidance to encourage your governor to participate in the EANS program. You can adapt the letter to suit the specifics of your state.
 - [Generic Letter to Governor](#)
3. **Watch for updates from the AACCS and from your SEA.** Along with receiving updates from our office, you can check your SEA's website periodically for state updates and important deadlines for the EANS program.

HELP FROM THE EANS

The EANS can help your ministry in several ways. Here are some top-line facts about the EANS.

- The EANS supplies funding for the following qualified expenses:
 - A. Cleaning and disinfecting supplies.
 - B. Personal protective equipment.
 - C. Improving ventilation and air purification systems.
 - D. Staff training on practices to contain the spread of infectious diseases.
 - E. Physical barriers used to ensure social distancing.
 - F. Other materials, supplies, or equipment used to maintain a safe in-person school environment according to CDC guidelines and recommendations.
 - G. COVID-19 testing and contact tracing.
 - H. Technology used to provide distance or hybrid learning, such as hardware, software, connectivity, assistive technology, and adaptive equipment.
 - I. Developing new curriculum plans for remote learning or to recoup learning losses.
 - J. Leasing classroom space to maintain social distancing and other health guidelines.
 - K. Reasonable transportation costs.
 - L. Providing support services for remote and hybrid learning or to address learning losses.
 - M. Reimbursement for any of the above expenses [except for C. (other than portable air purification systems), D., I., and L.] that the school incurred and that were not reimbursed through a PPP loan.
- Participating schools cannot seek reimbursement from both the PPP and EANS for the same expenses (no double-dipping).
- Schools cannot participate in both the **renewed** PPP and the EANS programs. The EANS application states that you cannot even apply for both these programs simultaneously; however, ED has indicated that it will interpret the guidance to allow a school to apply for one program if its application to the other program was denied.
- The EANS are intended to apply to all students with priority given to low-income families.
- Control of funds remains with the state, protecting Christian schools from being considered recipients of federal financial assistance (FFA). However, there is concern among the private school community that reimbursements for past purchases could be considered FFA.
*Although allowed under the program provisions (see below), Christian schools should be cautious about requesting reimbursements for purchases made **prior** to the passage of the bill, since this may open your ministry up to being considered a recipient of FFA.
- Schools have six months to apply for and receive the funds. After six months, the EANS funds will be reabsorbed into the governor's supplemental fund.
- Reimbursements are allowed back to March 13, 2020.
- Because every state will handle the EANS program differently, you will need to engage with your own state leadership to ensure that this opportunity benefits the schools in your state.

PAYCHECK PROTECTION PROGRAM (PPP)

The PPP was also renewed in the latest Covid-19 bill. Christian schools can participate in the PPP just as they did in the CARES Act, whether they participated previously or not. However, they cannot participate in both the renewed PPP and the EANS at the same time. The roll-out for the new PPP funds will begin this week.