

# 2022 Nebraska Emergency Assistance to Non-Public Schools

ARP EANS, GEER II Supplemental & Gap Assistance Overview

March 22, 2022



# WELCOME

## Before we begin:

- This webinar will be recorded and posted to the [NDE ARP EANS](#) webpage
- Slides will also be available on the [NDE ARP EANS](#) webpage
- There will be pauses throughout the presentation and at the end where you can unmute for questions.
- Please utilize the chat box for questions throughout the presentation

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- Programs Available
  - Eligibility
  - **Timeline**
  - **Application**
  - Allowable Uses
  - Control of Funds/Inventory
  - FACTS Resources
  - Website & Support



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# AGENDA

*What to  
expect next?*

— ” —

# 2022 Nebraska Emergency Assistance to Non-Public Schools: *Programs*

## ARP EANS

- \$17,054,414 in Services & Assistance
- Second round of EANS
- Expansion of EANS I
- Reimbursement prohibited
- New Significant Poverty Percentage threshold

## GEER II Supplemental Assistance

- \$2,173,039 in Services & Assistance
- Schools which did not receive a distribution under the ARP EANS program; or
- Incurred expenses prior to ARP EANS program commencement during the 2021-2022 School Year

## GEER II Gap Assistance

- \$921,078 in Services & Assistance
- Schools that received a loan under the Paycheck Protection Program (PPP) that was made on or after December 27, 2020 and experienced a funding gap due to ineligibility for assistance under the CRRSA EANS and ARP EANS programs.

*To address the  
impact of the  
current pandemic*

# 2022 Nebraska Emergency Assistance to Non-Public Schools: *Overview*

	ARP EANS	GEER II Supplemental Assistance	GEER II Gap Assistance
Services & Assistance	\$17,054,414	\$2,173,039	\$921,078
Period of Performance	September 30, 2024	September 20, 2023	September 20, 2023
Eligibility	Non-Profit, Accredited Rule 10 or 14 school, Operated prior to March 13, 2020 Did not receive PPP on or after 12/27/20 <b>22% Significant Poverty &amp; Most Impacted</b>	Non-Profit, Accredited Rule 10 or 14 school, Operated prior to March 13, 2020 Did not receive PPP on or after 12/27/2020 <b>No allocation under ARP EANS; or Incurred allowable EANS expenses in 2021-22</b>	Non-Profit, Accredited Rule 10 or 14 school, operated prior to March 13, 2020 <b>Received PPP on or after 12/27/20 More combined EANS resources than PPP</b>
School Data Year	2019-2020 School Year	2019-2020 School Year	2019-2020 School Year
Allocation	Significant Poverty % Targeting Index <u>and</u> Most Impacted PPA	Significant Poverty % Targeting Index <u>and</u> Most Impacted PPA	Formula Allocation = CRRSA EANS + ARP EANS - PPP
Allowable Uses	Same as CRRSA EANS, except reimbursement prohibited	<u>Not served under ARP EANS program</u> - same as ARP EANS, no reimbursement. <u>Reimbursement program</u> - allowable CRRSA EANS reimbursement activities	Same as CRRSA EANS, reimbursement allowed
	Application, Budgeting, Requesting & Provide Direct or Contracted Services <b>Reimbursement, <u>not</u> allowable</b>	Application, Budgeting, Requesting & Provide Direct or Contracted Services Reimbursement allowable	Application, Budgeting, Requesting & Provide Direct or Contracted Services Reimbursement allowable

# UPDATED TIMELINE | FOR ALL PROGRAMS

Date	Year	Activity
March 22	2022	Program Webinar: 2022 Emergency Assistance to Nonpublic Schools (Virtual link sent to non-public schools) Application Published
March 22-April 12	2022	Application Deadline
April 20	2022	Applications Approved, Final Services and Assistance Published
April 21	2022	Schools Begin Budgeting Distribution Approved Budgets - Begin Requesting/Obligating Services or Assistance
June 1	2022	Initial Budget Workbook Submission Deadline (to receive summer services)
August 15-September 15	2022	Amended Budget Workbook Submission Deadline Deadline for Obligation of Service/Assistance
September 20	2023	GEER II Supplemental/Gap Services and Assistance Period Ends
September 30	2024	ARP EANS Services and Assistance Period Ends

# ARP EANS

**New** 22% Significant Poverty %  
and Most Impacted Eligibility

*What is proportionality?*

## Most Impacted Factors:

- Social Vulnerability Index (UNMC)
- Number of COVID-19 cases per capita
- Number of COVID-19 deaths per capita
- Low-Income by grade span
- Economic impact, CDC mitigation costs

# APPLICATION & FINAL LEVELS OF ASSISTANCE

## Application:

- FACTS will contact school with application link
- Same application to apply for all three programs

## Final Levels of Assistance:

- NDE's [ARP EANS](https://www.education.ne.gov/cares-act/arp-eans/) webpage or [www.education.ne.gov/cares-act/arp-eans/](https://www.education.ne.gov/cares-act/arp-eans/)
- Located on the left side of the webpage: ARP EANS, Supplemental Assistance, or Gap Assistance tabs
- Final levels of assistance will be posted upon approval of applications



# Allowable Uses

- Supplies to sanitize, disinfect, and clean school facilities; **not service to perform**
- Personal protective equipment (PPE)
- Improving ventilation systems, including windows or portable air purification systems
- Training and professional development for staff on sanitization, the use of PPE, and minimizing the spread of infectious diseases.
- Physical barriers to facilitate social distancing
- Other materials, supplies, or equipment recommended by the CDC for reopening and operation of school facilities to effectively maintain health and safety
- Expanding capacity to administer coronavirus testing to effectively monitor and suppress the virus
- Educational technology (including hardware, software, connectivity, assistive technology, and adaptive equipment) to assist students, educators, and other staff with remote or hybrid learning
- Redeveloping instructional plans, including curriculum development, for remote or hybrid learning, or to address learning loss. • Leasing sites or spaces to ensure safe social distancing
- Reasonable transportation costs
- Initiating and maintaining education and support services or assistance for remote or hybrid learning or to address learning loss

## QUICK FACTS

### Allowable Activities:

Remains the same  
under all programs

### Reimbursement:

ARP EANS - **Prohibited**  
Supplemental-21/22 SY  
GAP-back to 3/13/2020  
\*Including Contracts\*

### For Reimbursement:

Reasonable/Necessary  
Allowable  
Support (Invoice)  
Actually Received  
Not supported with  
other Federal Funds

Does not make a non-  
public school a  
recipient of Federal  
financial assistance

# Future Allowable, Not Reimbursable:

- Improvements to ventilation systems (including windows), except for portable air purification systems, which may be reimbursed
- Any expenses reimbursed through a loan guaranteed under the PPP (15 U.S.C. 636(a)) prior to December 27, 2020
- Staff training and professional development on sanitization, the use of PPE, and minimizing the spread of COVID-19
- Redeveloping instructional plans, including curriculum development, for remote or hybrid learning or to address learning loss. • Initiating and maintaining education and support services or assistance for remote or hybrid learning or to address learning loss

*While the Nebraska Department of Education may not reimburse a nonpublic school for the above expenses, FACTS Education Solutions may provide these services or assistance directly to a nonpublic school or through a contract with an individual, association, agency, or organization.*

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# Installation of Equipment/Supplies

*May EANS be used to pay for installation of equipment or supplies purchased with EANS funds?*

- To the extent the purchase is allowable
- Tempered by several other provisions:
  - Section 312(d)(7) of the CRRSA Act
    - State must keep title to materials, equipment and property
  - 34 C.F.R. Section 76.661
    - Must be able to be removed without remodeling
  - 34 C.F.R. Section 76.662
    - Prohibits use of funds for construction/capital improvement
- Authorized activity being allowable depends on the attendant circumstances
  - Portable aid purification system – allowable, removed without remodeling
  - Ventilation system installed – not allowable, capital improvement
  - New windows – not permissible, not removable
  - Repairing old windows – permissible

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# Installation of Equipment/Supplies

*May EANS be used to pay for installation of equipment or supplies  
purchased by a non-public school  
for purposes of improving its ventilation system?*

- To the extent the purchase is allowable
  - Generally, may be used for installation of supplies or equipment that is otherwise allowable and not for activities that is not otherwise allowable
- 312(d)(4)(C) of the CRRSA Act
  - Authorizes use for improving ventilation systems
  - To install supplies or equipment that are otherwise unallowable as long as such supplies or equipment are needed to improve a non-public school's ventilation system
- For example:
  - Purchasing new windows using EANS funds – not allowable
  - Purchasing new windows using non-public school funds for the purpose of improving ventilation (e.g., replacing windows that do not open with ones that do), the State may use EANS funds for the installation of such windows

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# STATE RETAINS TITLE | PROPERTY, EQUIPMENT, & SUPPLIES

- 2 C.F.R. Section 200.1 apply to:
  - Directly procuring/providing
  - Contracting for services
  - Reimbursement for title (reasonable, allowable, documentation, school received, not supported by other federal dollars)
- With respect to property, equipment, and some tangible supplies:
  - Must maintain records of equipment and supplies to each non-public school (Inventory tags)
    - Laptops – retaining title is clear
    - Consumable tangible supplies – e.g., personal protective equipment (PPE) or cleaning supplies, available for short duration and consumed; documentation that the State provided such supplies is sufficient
    - Software license – no physical presence, has value, can be “owned” and controlled
    - Not consumed during period of performance (EANS: 9/30/2024, GEER II 9/20/2023) – must be removed but preferred to transferred for use under another Federal program (transferred to LEA for use under ESEA or IDEA)



# Resources

NDE Emergency Assistance Website:  
[www.education.ne.gov/cares-act](http://www.education.ne.gov/cares-act)

Select tab (left side): ARP EANS, GEER II  
Supplemental Assistance, or GEER II Gap  
Assistance tab

Program Takeaways

Eligibility

Timeline

Allowable Activities

FAQs & Fact Sheet

Preliminary Levels of Service

Recording of this Presentation & Slide Deck

# CONTACTS

For program, eligibility, application, allowable services, and student data questions, please contact the Nebraska Department of Education:



Jim Kent  
Nebraska Non-Public Ombudsman  
[Jim.Kent@nebraska.gov](mailto:Jim.Kent@nebraska.gov)

For budget workbook, requesting services and assistance, or spenddown report questions, please contact FACTS Education Solutions:



Elizabeth Shelton & Sarah Noble  
[EANSfunds@factsmgt.com](mailto:EANSfunds@factsmgt.com)