

## State of New Hampshire Frequently Asked Questions

Funds must be used in accordance to the CRRSA EANS grant.

*Ask yourself: How/Does this prevent, prepare and / or respond to COVID-19?*

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### CRRSA Act EANS

#### Questions from New Hampshire Schools & US Department of Education's Response

1. May EANS funds be used to reimburse a non-public school for salaries of faculty hired to enable a school to meet COVID guidelines?  
Per D-6 in the EANS FAQs: **D-6. May EANS funds be used to pay the salaries of non-public school teachers or other staff?** (NEW March 19, 2021)  
EANS funds may not be used to provide funds to non-public schools to cover payroll. Under section 312(d)(7) of the CRRSA Act, a public agency must control funds for services or assistance provided to non-public school students and teachers under the EANS program. However, an SEA may contract with a teacher at a non-public school directly to provide secular, neutral, and non-ideological services outside of the teacher's contractual obligation with the non-public school. The non-public school teacher must be employed by the SEA or another public entity for EANS purposes outside of the time he or she is employed by the non-public school, and the non-public school teacher must be under the direct supervision of the SEA or other public entity with respect to all EANS activities. Also, an SEA may contract with a vendor to provide staff, such as nurses or teachers, who will provide services in non-public schools. The contract must be under the control and supervision of the SEA or another public entity.
2. If a non-public school hires an additional nurse to assist with COVID screening and testing, would the salary and benefits associated with this hire be an approved expense for the EANS funds?  
An additional nurse for COVID testing and monitoring - is this allowable?  
See answer to #1 and FAQs.
3. If I purchased 150 of the same asset for 249.99 per item would these each be considered an individual asset by the Federal Government and not be required to be returned to the SEA?  
No, an item valued at less than \$250 is not considered a Capital Asset.
4. We have already planned some purchases for this month. To what date can purchases for reimbursement be made? April 25? Or was there a cutoff date?  
Any purchases you have not already made may not be considered reimbursements. By stating that you have purchases yet to be made confirms they are not reimbursements as they have not been purchased.
5. Under item #1, supplies to sanitize, disinfect, and clean school facilities – Does this apply reimbursement for payments to a third party who has been sanitizing school premises on a nightly basis?  
Only supplies are an allowable expenditure.

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6. When are applications due? May we adjust our purchase and reimbursement requests?  
Complete applications are due 4/25/2021. Once submitted, purchase and reimbursement requests may not be adjusted as the state will implement these reimbursement and purchases as soon as resources allow. If allocated funds for your school remain after the submission of your completed application on or before 4/25/2021, you may submit an additional template for reimbursement of purchases.
7. What does “obligated” mean?  
See FAQs. The regulations at 34 C.F.R. § 76.707 govern when an obligation of Federal funds by an SEA occurs. Specifically, for services or assistance provided through a contract, the obligation is made on the date the SEA makes a binding written commitment to obtain the services or work. For rental of real or personal property, the obligation is made when the property is used.
8. When must funds be obligated?  
See FAQs B-10.
9. If I request reimbursement for an item valued at more than \$250, would this item be considered a capital asset and subject to quarterly reporting?  
Those items already purchased for which we are asking for reimbursement....does the State own those items if over \$250.  
Yes. Any item valued at \$250 that the school utilizes EANS funds for the purchase or reimbursement of will be a capital asset and subject to reporting as required by the grant.
10. Would the COVID testing of students and employees weekly be covered?  
See FAQs D-7.
11. If we are in discussions for ESSER funds but have not received what we should have, do we include that information on the template and then delete if it is later reimbursed from the district?  
Yes, this must be answered within your application.
12. Where/How do we give you copies of paid invoices?  
Please scan them and email them with your complete application.
13. Assuming a school stays within its final allocation and the allowed usage of funds, what is the significance of the "order of preference" column? Is there a likelihood that some requests may not be filled due to some other constraint?

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This is to ensure we provide you with the reimbursement(s) and purchase(s) that meet your priority(s).

14. What if we bought cleaning supplies from our local Walmart? Can we provide receipts for those instead of official invoices?  
Yes, provided they show proof of payment. Receipts/Invoices may be requested during an audit.
15. Can we submit the application for something we want to purchase ourselves in June/July and send the copy of the paid invoice in August? Or does everything need to have already been done by now OR be considered a "purchase" by the state?  
Please submit your complete application by April 25, 2021. Any item that is to be purchased using EANS funds, or for which the school will request reimbursement, must be included in the application. If the individual cost is \$250+, the item is considered a capital asset and is subject to the reporting requirements.
16. Are cables (ethernet, HDMI, etc.) considered educational technology?  
Educational technology may include hardware, software, connectivity, assistive technology, and adaptive equipment. Please see FAQ D-2.
17. Would "reasonable transportation costs" include the cost of gas and/or mileage reimbursements so that staff could travel to provide home-based instruction to students whose parents requested home-based instruction?"  
Yes, gas or mileage reimbursements would be an allowable expense for reasonable transportation costs. You must choose either gas or mileage. Food is not an allowable reasonable transportation cost.
18. How should shipping and / or handling be noted on the EANS Application Reimbursement or Purchase Template?  
Please list this as a separate line item within the EANS Application Reimbursement or Purchase Template.
19. May I use EANS funds to build a playground?  
EANS funds may not be used for construction. However, funds may be used for the purchase or rental of playground equipment.
20. May I use EANS funds to build an addition to one of our buildings?  
May EANS funds be used to convert an unfinished space into a classroom space?  
EANS funds may not be used for construction purposes.

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21. May EANS funds be use for repairing windows?

Yes. However, EANS funds may not be used for replacing windows.

22. Is leasing technology allowable under EANS?

Yes.

23. Are districts allowed to restrict student movement from one district to another, due to COVID-19?

Our Federal partners replied: We believe that restricting student movement would be a State decision. There are no Federal requirements that would apply to your question of when students can move from one district to another.

24. Are warranties for computers covered as part of EANS?

No, this is not an allowable use of EANS funds.

25. School eligibility for EANS as related to the application/receipt of PPP: A non-public school also runs summer camps. They are one legal entity (the school), however they are regulated separately. DoE regulates and monitors the school. Dept of Health & Human Services regulates and monitors the camps. The camps applied for and received PPP during the time period that would disqualify an application for EANS funds. The school did not take part in the PPP during the disqualification time period. NH DoE has no concerns about our ability to ensure compliance and that EANS funds are only used by the school and regulating the school separately from the camp. Question: May the school still apply to EANS? Or, because the school is part of the one legal entity that also includes the camps, is the school disqualified from the EANS program due to the camps PPP?

Based on the information provided, we understand that the non-public school received a PPP loan on or after December 27, 2020. The PPP loan was used to support a summer camp operated by the non-public school. The non-public school is now interested in applying for EANS assistance.

Per section 312(d)(9) of the Coronavirus Response and Relief Supplemental Appropriations (CRRSA) Act, in order to be eligible for assistance under the EANS program, a non-public must submit an assurance that it did not, and will not, apply for and receive a loan under the Small Business Administration's Paycheck Protection Program (PPP) (15 U.S.C. 636(a)(37)) that is made on or after December 27, 2020.

We appreciate that the non-public school may have only used PPP funds to support the summer camp program. However, while the non-public school may operate various programs, it is our understanding that it does not do so as two separate entities. Based on the information

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provided, we do not believe the non-public school is eligible for EANS assistance. If our understanding of the specific circumstances is not accurate, please let us know.