

**Subject:** Emergency Assistance for Non-Public Schools Program Update #10

**Date:** September 10, 2021

**From:** EANS email account

Greetings Wisconsin EANS Program Participants and Interested Parties,

The purpose of this email is to provide timely updates regarding the EANS program in Wisconsin. It includes new allowable expenses, reminders about reimbursement timeline and processes, and information about EANS as funded in the American Rescue Plan (ARP) Act.

### **EANS funds may be used to support vaccine incentive programs.**

We understand that some schools are interested in using EANS funds for vaccine incentive programs. We have updated the [allowable expenses document](#) to show that such expenses are allowable. Vaccines significantly reduce the spread of COVID-19 and reduce the severity of the virus when spread. Further, the [CDC lists](#) promotion of vaccination as a key COVID-19 prevention strategy.

Vaccination-related activities should be placed in category 6 (other materials, supplies, or equipment recommended by the CDC for reopening and operation of school facilities to effectively maintain health and safety). You will be able to request future reimbursement or direct service for these programs, which typically provide something like a gift card or other incentive (like school supplies or a tablet) for staff, students, and household members that provide evidence of full vaccination.

This [FAQ from the U.S. Department of Education](#) regarding allowable use of EANS funds for vaccine incentive programs is a useful resource. It includes this:

*Any incentives that an LEA provides with ESSER and GEER funds must meet the requirements in 2 CFR Part 200, including the requirement that the amount of the incentive be reasonable and may not violate any other applicable laws or requirements (e.g., incentives may not involve alcohol per 2 CFR § 200.423).*

If you choose to use EANS funds in support of a vaccine incentive program, please note the following:

- In order to comply with reasonableness requirements, and to help the program run as efficiently as possible (i.e., to cut down on steps in the claim process for you and for CESA 6), the maximum allowed incentive will be \$100.
- The program cannot provide cash rewards but can provide something like a Visa or other allowable gift card.
- When requesting future reimbursement or direct service, include the amount and type of incentive(s) that you plan to provide (e.g., \$100 Visa gift cards, or; we request to purchase three iPads totalling \$x,xxx to be distributed as part of a drawing of vaccinated 1) staff; 2) students; and 3) household members).
- Schools will provide final counts and dollar amounts to CESA 6 as part of the direct service or reimbursement process. CESA 6 will not collect vaccine information from schools; schools are responsible to collect and maintain appropriate evidence and contact information for individuals participating in the vaccine incentive program. Again, schools

should *not* provide any specific records of vaccination to CESA 6; only final counts are required for CESA 6 to issue a purchase order.

- Support for vaccine incentive programs through direct service will require final counts that you have certified before the incentive may be provided. Please consider how you will communicate about these timelines to participants.

*CESA 6 will host a webinar about vaccine incentive programs on Wednesday, September 15, from 2:00-3:00. Please [register here](#) or plan to access the recording after.*

## **Claims for past reimbursement must be submitted no later than September 30, 2021.**

As a reminder, past reimbursements cover allowable purchases from March 13, 2020 through June 1, 2021.

CESA 6 hosted a webinar on September 9th for schools that have not yet expended any of their available EANS funds. Anyone can access the [recording](#) of this webinar. We have heard that some schools may not be using their EANS funds because they have separately determined since submitting their applications that they in fact are not eligible for EANS. In most cases, this is because the school did receive a PPP loan on or after December 27, 2020, which would negate their program eligibility. As a reminder, the EANS application required schools to certify that they had not received such a loan, but in some cases the person completing the application did not know that the school had received a PPP loan on or after December 27, 2020. If this is the case for your school, please email [EANS@dpi.wi.gov](mailto:EANS@dpi.wi.gov) to let us know. It is important that we update our records accordingly. Thank you in advance.

## **Governor Evers's office submitted Wisconsin's application for the American Rescue Plan (ARP) Act EANS Program.**

The ARP EANS program differs from CRRSA (or round 1) EANS in two important ways:

1. ARP EANS funds may only be used for direct services; reimbursements (past or future) are not allowed.
2. States are required to set eligibility criteria that incorporate *both* the impact of COVID-19 on a school *and* a school's low-income enrollment. This requirement has the potential to limit the number of schools that are eligible for the program by a significant amount.

DPI's approach to setting ARP EANS eligibility criteria is based upon a goal of including as many schools as reasonably possible within the language of the law.

### *Wisconsin's Eligibility Criteria*

Note that a school must satisfy *both* eligibility criteria in order to be eligible.

*COVID Impact:* All schools participating in CRRSA EANS were significantly impacted by COVID-19.

*Low-income enrollment:* Schools with 20 percent low-income enrollment should be considered as enrolling a significant portion of students from low-income families.

*Additional criteria:* Also include schools that have demonstrated need by accessing CRRSA EANS services and assistance by completing at least one transaction with CESA 6 (the EANS Program Administrator) on or before September 30, 2021. This includes schools with low-income enrollment that below 20 percent.

Please note the additional criteria; your eligibility is based upon your school's action. Submitting a claim for reimbursement or request for service by the end of September will be necessary for schools with low-income enrollment below 20 percent to be eligible based upon Wisconsin's proposal.

### Next steps for ARP EANS

State applications were due on September 9th. Because Wisconsin did not select the recommended thresholds in our application, we anticipate some dialogue with the U.S. Department of Education (USDE). This may delay our application approval, but we can't anticipate for how long. It is also possible that the final criteria that are approved differ from our initial proposal, given what we learn in conversation with USDE. We will keep you aware of our application status as new information becomes available.

Thank you for your attention to the content of this email. If you have any questions about ARP EANS, please email me at [EANS@dpi.wi.gov](mailto:EANS@dpi.wi.gov). If you have questions about vaccine incentive programs we hope you can join [the webinar](#) on Wednesday, September 15th, from 2:00-3:00. All other program questions should go to [EANS@CESA6.org](mailto:EANS@CESA6.org).

The beginning of the 2021-22 school year likely looks different than last school year, but also different than perhaps many of us expected even a couple months ago. I hope that it has gone smoothly and safely for all of you, your staff, and students, and I wish you a happy and healthy school year.

Warmly,  
Laura

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