| **Comment Summary/Suggestion for change**  | **Applicable question(s) on EANS Form (60-day notice FRN)** | **Applicable Comments ID#** | **Commentor(s)** | **Proposed ED Response** |
| --- | --- | --- | --- | --- |
| Require SEAs to report/identify each non-public school that requested services or assistance under the EANS program | Q12, Q13 | ED-2021-SCC-0103-0008ED-2021-SCC-0103-0007ED-2021-SCC-0103-0006 | AASA, The School Superintendents AssociationAmerican AtheistsAmerican Federation of State, County and Municipal EmployeesAmerican Federation of TeachersAmerican Humanist AssociationAmericans United for Separation of Church and StateAssociation of Educational Service AgenciesAssociation of School Business Officials International (ASBO)Baptist Joint Committee for Religious Liberty (BJC)The Center for Inquiry and The Richard Dawkins Foundation for Reason & ScienceClearinghouse on Women's IssuesCouncil of the Great City SchoolsFeminist Majority FoundationGLSENInterfaith AllianceNational Association of Secondary School Principals (NASSP)National Disability Rights Network (NDRN)National Education AssociationNational School Boards AssociationNetwork for Public EducationPublic Funds Public SchoolsSecular Coalition for AmericaThe Southern Education FoundationCouncil of the Great City Schools | Form change. The Department believes that requiring States to provide the names of non-public schools that were served by the EANS funds provides important and sufficient transparency to address the concerns raised by the commentors.  |
| Require SEAs to report for each non-public:* The type(s) of services each non-public school requested
* The type(s) of services received
* The date(s) when services were received

Require States to report the financial amounts of services requested by each non-public school, the amounts of services approved, and the date of each obligation | Q12, Q13 | ED-2021-SCC-0103-0008ED-2021-SCC-0103-0007ED-2021-SCC-0103-0006 | AASA, The School Superintendents AssociationAmerican AtheistsAmerican Federation of State, County and Municipal EmployeesAmerican Federation of TeachersAmerican Humanist AssociationAmericans United for Separation of Church and StateAssociation of Educational Service AgenciesAssociation of School Business Officials International (ASBO)Baptist Joint Committee for Religious Liberty (BJC)The Center for Inquiry and The Richard Dawkins Foundation for Reason & ScienceClearinghouse on Women's IssuesCouncil of the Great City SchoolsFeminist Majority FoundationGLSENInterfaith AllianceNational Association of Secondary School Principals (NASSP)National Disability Rights Network (NDRN)National Education AssociationNational School Boards AssociationNetwork for Public EducationPublic Funds Public SchoolsSecular Coalition for AmericaThe Southern Education FoundationCouncil of the Great City Schools | No change. The Department believes that requiring States to provide the names of non-public schools that were served by the EANS funds provides important and sufficient transparency to address the concerns raised by the commentors. |
| Require SEAs to report additional data on the total number of students in each non-public school and total number of students from low-income families at the non-public schools that received services from EANS. | Q12, Q13 | ED-2021-SCC-0103-0008ED-2021-SCC-0103-0007ED-2021-SCC-0103-0006 | AASA, The School Superintendents AssociationAmerican AtheistsAmerican Federation of State, County and Municipal EmployeesAmerican Federation of TeachersAmerican Humanist AssociationAmericans United for Separation of Church and StateAssociation of Educational Service AgenciesAssociation of School Business Officials International (ASBO)Baptist Joint Committee for Religious Liberty (BJC)The Center for Inquiry and The Richard Dawkins Foundation for Reason & ScienceClearinghouse on Women's IssuesCouncil of the Great City SchoolsFeminist Majority FoundationGLSENInterfaith AllianceNational Association of Secondary School Principals (NASSP)National Disability Rights Network (NDRN)National Education AssociationNational School Boards AssociationNetwork for Public EducationPublic Funds Public SchoolsSecular Coalition for AmericaThe Southern Education Foundation | No change. The Department believes that requiring States to provide the names of non-public schools that were served by the EANS funds provides important and sufficient transparency to address the concerns raised by the commentors. |
| Require SEA to report data on what other federal, state, and local funds has each private school received, including from state voucher programs, educational saving accounts, or the Paycheck Protection Program (PPP) | Q12, Q13 | ED-2021-SCC-0103-0008ED-2021-SCC-0103-0007ED-2021-SCC-0103-0006 | AASA, The School Superintendents AssociationAmerican AtheistsAmerican Federation of State, County and Municipal EmployeesAmerican Federation of TeachersAmerican Humanist AssociationAmericans United for Separation of Church and StateAssociation of Educational Service AgenciesAssociation of School Business Officials International (ASBO)Baptist Joint Committee for Religious Liberty (BJC)The Center for Inquiry and The Richard Dawkins Foundation for Reason & ScienceClearinghouse on Women's IssuesCouncil of the Great City SchoolsFeminist Majority FoundationGLSENInterfaith AllianceNational Association of Secondary School Principals (NASSP)National Disability Rights Network (NDRN)National Education AssociationNational School Boards AssociationNetwork for Public EducationPublic Funds Public SchoolsSecular Coalition for AmericaThe Southern Education Foundation | No change. The Department believes that requiring States to provide the names of non-public schools that were served by the EANS funds provides important and sufficient transparency to address the concerns raised by the commentors. |
| Ask States to identify schools, if any, are subject to any complaints from the Office for Civil Rights | Q12, Q13 | ED-2021-SCC-0103-0008ED-2021-SCC-0103-0007ED-2021-SCC-0103-0006 | AASA, The School Superintendents AssociationAmerican AtheistsAmerican Federation of State, County and Municipal EmployeesAmerican Federation of TeachersAmerican Humanist AssociationAmericans United for Separation of Church and StateAssociation of Educational Service AgenciesAssociation of School Business Officials International (ASBO)Baptist Joint Committee for Religious Liberty (BJC)The Center for Inquiry and The Richard Dawkins Foundation for Reason & ScienceClearinghouse on Women's IssuesCouncil of the Great City SchoolsFeminist Majority FoundationGLSENInterfaith AllianceNational Association of Secondary School Principals (NASSP)National Disability Rights Network (NDRN)National Education AssociationNational School Boards AssociationNetwork for Public EducationPublic Funds Public SchoolsSecular Coalition for AmericaThe Southern Education Foundation | No change. The Department believes that requiring States to provide the names of non-public schools that were served by the EANS funds provides important and sufficient transparency to address the concerns raised by the commentors. |
| Require the SEAs to identify whether the non-public school is accredited and report the accreditation body that accredited the non-public school | Q12, Q13 | ED-2021-SCC-0103-0008ED-2021-SCC-0103-0007ED-2021-SCC-0103-0006 | AASA, The School Superintendents AssociationAmerican AtheistsAmerican Federation of State, County and Municipal EmployeesAmerican Federation of TeachersAmerican Humanist AssociationAmericans United for Separation of Church and StateAssociation of Educational Service AgenciesAssociation of School Business Officials International (ASBO)Baptist Joint Committee for Religious Liberty (BJC)The Center for Inquiry and The Richard Dawkins Foundation for Reason & ScienceClearinghouse on Women's IssuesCouncil of the Great City SchoolsFeminist Majority FoundationGLSENInterfaith AllianceNational Association of Secondary School Principals (NASSP)National Disability Rights Network (NDRN)National Education AssociationNational School Boards AssociationNetwork for Public EducationPublic Funds Public SchoolsSecular Coalition for AmericaThe Southern Education Foundation | No change. The Department believes that requiring States to provide the names of non-public schools that were served by the EANS funds provides important and sufficient transparency to address the concerns raised by the commentors. |
| For the SEAs where EANS appropriations from either the Coronavirus Response and Relief Supplemental Appropriations (CRRSA) Act or the American Rescue Plan (ARP) Act were not all obligated but remained with the state, ask how were those non-obligated appropriations allocated? |  | ED-2021-SCC-0103-0008ED-2021-SCC-0103-0007ED-2021-SCC-0103-0006 | AASA, The School Superintendents AssociationAmerican AtheistsAmerican Federation of State, County and Municipal EmployeesAmerican Federation of TeachersAmerican Humanist AssociationAmericans United for Separation of Church and StateAssociation of Educational Service AgenciesAssociation of School Business Officials International (ASBO)Baptist Joint Committee for Religious Liberty (BJC)The Center for Inquiry and The Richard Dawkins Foundation for Reason & ScienceClearinghouse on Women's IssuesCouncil of the Great City SchoolsFeminist Majority FoundationGLSENInterfaith AllianceNational Association of Secondary School Principals (NASSP)National Disability Rights Network (NDRN)National Education AssociationNational School Boards AssociationNetwork for Public EducationPublic Funds Public SchoolsSecular Coalition for AmericaThe Southern Education Foundation | Form Change. The Department has included a new section (II) in the EANS report to specifically collect data from States on unobligated EANS funds returned to the Governor for authorized uses under the GEER II Fund. |
| Require SEAs to report the hiring and admissions policies of each participating non-public school including limiting admissions or employment based on student, family, or employee religion, sexual orientation, gender identity, disability, or English fluency, and whether the school requires students or staff to adhere to codes of conduct or statements of faith |  |  | AASA, The School Superintendents AssociationAmerican AtheistsAmerican Federation of State, County and Municipal EmployeesAmerican Federation of TeachersAmerican Humanist AssociationAmericans United for Separation of Church and StateAssociation of Educational Service AgenciesAssociation of School Business Officials International (ASBO)Baptist Joint Committee for Religious Liberty (BJC)The Center for Inquiry and The Richard Dawkins Foundation for Reason & ScienceClearinghouse on Women's IssuesCouncil of the Great City SchoolsFeminist Majority FoundationGLSENInterfaith AllianceNational Association of Secondary School Principals (NASSP)National Disability Rights Network (NDRN)National Education AssociationNational School Boards AssociationNetwork for Public EducationPublic Funds Public SchoolsSecular Coalition for AmericaThe Southern Education Foundation | No change. The Department believes that requiring States to provide the names of non-public schools that were served by the EANS funds provides important and sufficient transparency to address the concerns raised by the commentors. |
| Require SEAs to report the per pupil equivalent amount of the services approved (calculated based the number of enrolled students) for each non-public school. | Q12, Q13 | ED-2021-SCC-0103-0006 | Council of the Great City Schools | No change. The Department believes that requiring States to provide the names of non-public schools that were served by the EANS funds provides important and sufficient transparency to address the concerns raised by the commentors.  |
| Make this question optional for SEAs to reports. States were given flexibility regarding how they prioritized non-public schools this question should be optional or if applicable | Q5 | ED-2021-SCC-0103-0005 | Delaware Department of Education | No change. SEAs generally have flexibility with regard to how it prioritizes non-public schools to receive services or assistance under the EANS program; however, the statute requires an SEA to target low-income schools and schools most impacted by COVID-19. The Department believes that SEAs should be transparent about the factors considered in prioritizing non-public schools to receive services or assistance under the EANS program through the CRRSA Act. |
| Since the tables do not include a column for administrative obligations and expenditures the tables will not reflect the full amount of obligations and expenditures | Q12, Q13 | ED-2021-SCC-0103-0005 | Delaware Department of Education | Form change. The Department has included a category for administrative use. |
| Please clarify this question. It is unclear if this is asking for the total number of low-income families in the schools that received CRRSA EANS funding; or the total number of low-income families who received services or assistance from CRRSA EANS funds in the non-public schools. | Q18 | ED-2021-SCC-0103-0005 | Delaware Department of Education | Form clarification. This question asks SEAs to provide the total number of students (low-income student enrollment) from low-income families enrolled in the non-public schools that received services or assistance under CRRSA EANS funding. |
| Please clarify this question. It is unclear if this is asking for the total number of low-income families in the schools that received CRRSA EANS funding; or the total number of low-income families who received services or assistance from CRRSA EANS funds in the non-public schools | Q24 | ED-2021-SCC-0103-0005 | Delaware Department of Education | Form-clarification. This question asks SEAs to provide the total number of students (low-income student enrollment) from low-income families enrolled in the non-public schools that received services or assistance under ARP EANS funding. |