

**EANS Annual Data Collection 60-day FRN Comment Responses**

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-0103-0008 ED-2021-SCC-0103-0007 ED-2021-SCC-0103-0006	AASA, The School Superintendents Association American Atheists American Federation of State, County and Municipal Employees American Federation of Teachers American Humanist Association Americans United for Separation of Church and State Association of Educational Service Agencies Association of School Business Officials International (ASBO) Baptist Joint Committee for Religious Liberty (BJC) The Center for Inquiry and The Richard Dawkins Foundation for Reason & Science Clearinghouse on Women's Issues Council of the Great City Schools Feminist Majority Foundation GLSEN Interfaith Alliance National Association of Secondary School Principals (NASSP) National Disability Rights Network (NDRN) National Education Association National School Boards Association Network for Public Education Public Funds Public Schools Secular Coalition for America The Southern Education Foundation Council 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: <ul style="list-style-type: none"> <li>The type(s) of services each non-public school</li> </ul>	Q12, Q13	ED-2021-SCC-0103-0008	AASA, The School Superintendents Association	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

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<p>requested</p> <ul style="list-style-type: none"> <li>• The type(s) of services received</li> <li>• The date(s) when services were received</li> </ul> <p>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</p>		<p>ED-2021-SCC-0103-0007 ED-2021-SCC-0103-0006</p>	<p>American Atheists American Federation of State, County and Municipal Employees American Federation of Teachers American Humanist Association Americans United for Separation of Church and State Association of Educational Service Agencies Association of School Business Officials International (ASBO) Baptist Joint Committee for Religious Liberty (BJC) The Center for Inquiry and The Richard Dawkins Foundation for Reason &amp; Science Clearinghouse on Women's Issues Council of the Great City Schools Feminist Majority Foundation GLSEN Interfaith Alliance National Association of Secondary School Principals (NASSP) National Disability Rights Network (NDRN) National Education Association National School Boards Association Network for Public Education Public Funds Public Schools Secular Coalition for America The Southern Education Foundation Council of the Great City Schools</p>	<p>sufficient transparency to address the concerns raised by the commentors.</p>
<p>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.</p>	<p>Q12, Q13</p>	<p>ED-2021-SCC-0103-0008 ED-2021-SCC-0103-0007 ED-2021-SCC-0103-0006</p>	<p>AASA, The School Superintendents Association American Atheists American Federation of State, County and Municipal Employees American Federation of Teachers American Humanist Association Americans United for Separation of Church and State Association of Educational Service</p>	<p>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.</p>

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			<p>Agencies          Association of School Business Officials International (ASBO)          Baptist Joint Committee for Religious Liberty (BJC)          The Center for Inquiry and The Richard Dawkins Foundation for Reason &amp; Science          Clearinghouse on Women's Issues          Council of the Great City Schools          Feminist Majority Foundation          GLSEN          Interfaith Alliance          National Association of Secondary School Principals (NASPP)          National Disability Rights Network (NDRN)          National Education Association          National School Boards Association          Network for Public Education          Public Funds Public Schools          Secular Coalition for America          The Southern Education Foundation</p>	
<p>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)</p>	<p>Q12, Q13</p>	<p>ED-2021-SCC-0103-0008          ED-2021-SCC-0103-0007          ED-2021-SCC-0103-0006</p>	<p>AASA, The School Superintendents Association          American Atheists          American Federation of State, County and Municipal Employees          American Federation of Teachers          American Humanist Association          Americans United for Separation of Church and State          Association of Educational Service Agencies          Association of School Business Officials International (ASBO)          Baptist Joint Committee for Religious Liberty (BJC)          The Center for Inquiry and The Richard Dawkins Foundation for Reason &amp; Science          Clearinghouse on Women's Issues          Council of the Great City Schools</p>	<p>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.</p>

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			<p>Feminist Majority Foundation          GLSEN          Interfaith Alliance          National Association of Secondary School Principals (NASSP)          National Disability Rights Network (NDRN)          National Education Association          National School Boards Association          Network for Public Education          Public Funds Public Schools          Secular Coalition for America          The Southern Education Foundation</p>	
<p>Ask States to identify schools, if any, are subject to any complaints from the Office for Civil Rights</p>	<p>Q12, Q13</p>	<p>ED-2021-SCC-0103-0008          ED-2021-SCC-0103-0007          ED-2021-SCC-0103-0006</p>	<p>AASA, The School Superintendents Association          American Atheists          American Federation of State, County and Municipal Employees          American Federation of Teachers          American Humanist Association          Americans United for Separation of Church and State          Association of Educational Service Agencies          Association of School Business Officials International (ASBO)          Baptist Joint Committee for Religious Liberty (BJC)          The Center for Inquiry and The Richard Dawkins Foundation for Reason &amp; Science          Clearinghouse on Women's Issues          Council of the Great City Schools          Feminist Majority Foundation          GLSEN          Interfaith Alliance          National Association of Secondary School Principals (NASSP)          National Disability Rights Network (NDRN)          National Education Association          National School Boards Association</p>	<p>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.</p>

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			<p>Network for Public Education          Public Funds Public Schools          Secular Coalition for America          The Southern Education Foundation</p>	
<p>Require the SEAs to identify whether the non-public school is accredited and report the accreditation body that accredited the non-public school</p>	<p>Q12, Q13</p>	<p>ED-2021-SCC-0103-0008          ED-2021-SCC-0103-0007          ED-2021-SCC-0103-0006</p>	<p>AASA, The School Superintendents Association          American Atheists          American Federation of State, County and Municipal Employees          American Federation of Teachers          American Humanist Association          Americans United for Separation of Church and State          Association of Educational Service Agencies          Association of School Business Officials International (ASBO)          Baptist Joint Committee for Religious Liberty (BJC)          The Center for Inquiry and The Richard Dawkins Foundation for Reason &amp; Science          Clearinghouse on Women's Issues          Council of the Great City Schools          Feminist Majority Foundation          GLSEN          Interfaith Alliance          National Association of Secondary School Principals (NASSP)          National Disability Rights Network (NDRN)          National Education Association          National School Boards Association          Network for Public Education          Public Funds Public Schools          Secular Coalition for America          The Southern Education Foundation</p>	<p>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.</p>
<p>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</p>		<p>ED-2021-SCC-0103-0008          ED-2021-SCC-0103-0007          ED-2021-SCC-0103-</p>	<p>AASA, The School Superintendents Association          American Atheists          American Federation of State, County and Municipal Employees</p>	<p>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.</p>

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<p>appropriations allocated?</p>		<p>0006</p>	<p>American Federation of Teachers          American Humanist Association          Americans United for Separation of Church and State          Association of Educational Service Agencies          Association of School Business Officials International (ASBO)          Baptist Joint Committee for Religious Liberty (BJC)          The Center for Inquiry and The Richard Dawkins Foundation for Reason &amp; Science          Clearinghouse on Women's Issues          Council of the Great City Schools          Feminist Majority Foundation          GLSEN          Interfaith Alliance          National Association of Secondary School Principals (NASSP)          National Disability Rights Network (NDRN)          National Education Association          National School Boards Association          Network for Public Education          Public Funds Public Schools          Secular Coalition for America          The Southern Education Foundation</p>	
<p>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</p>			<p>AASA, The School Superintendents Association          American Atheists          American Federation of State, County and Municipal Employees          American Federation of Teachers          American Humanist Association          Americans United for Separation of Church and State          Association of Educational Service Agencies          Association of School Business Officials International (ASBO)          Baptist Joint Committee for Religious</p>	<p>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.</p>

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			<p>Liberty (BJC)  The Center for Inquiry and The Richard Dawkins Foundation for Reason &amp; Science  Clearinghouse on Women's Issues  Council of the Great City Schools  Feminist Majority Foundation  GLSEN  Interfaith Alliance  National Association of Secondary School Principals (NASSP)  National Disability Rights Network (NDRN)  National Education Association  National School Boards Association  Network for Public Education  Public Funds Public Schools  Secular Coalition for America  The Southern Education Foundation</p>	
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	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.

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services or assistance from CRRSA EANS funds in the non-public schools				
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