

The following guidelines were generated to accommodate the implementation of the U.S. Department of Education's guidance relative to LEAs approving CARES Act equitable services direct reimbursements to non-profit non-public schools.

The guidelines below only apply to the CARES Act of 2020. The CARES Act reimbursement guidance and LDOE guidelines do not apply to the formula grants/funds (Titles I, II, III, and IV).

NON-PUBLIC SCHOOLS' REIMBURSEMENT GUIDELINES:

- The LEA may use CARES Act funds to reimburse a non-public school for allowable COVID - 19 related expenses the non-public school incurred **on or after March 13, 2020, prior to the onset of equitable services before the LEA and non-public school officials engaged in timely and meaningful consultation and the onset of equitable services by the LEA.**
- **The deadline date for CARES Act reimbursements is July 30, 2020.**
- Under section 18005(b) of the CARES Act and 34 C.F.R. § 76.665(f), an LEA must maintain control over the funds for services and assistance provided to non-public school students and teachers under a CARES Act program and keep title to materials, equipment, and property purchased with such funds, and the LEA must administer such funds, materials, equipment, and property. All goods/services purchased with CARES Act funds via allocations for services are property of the LEA and not the non-public school.
- LEA may only reimburse a non-public school for necessary expenditures the non-public school incurred between March 13, 2020 – July 30, 2020, in response to COVID-19 under limited circumstances where it can do so while also meeting these requirements.
- The LEA must ensure those activities, materials, or equipment are allowable under the CARES Act and are secular, neutral, and non-ideological.
- Technology devices, equipment, items, etc. purchased must be free of religious symbols.
- **The non-public school must have sufficient documentation to support the reimbursements and produce evidence that the school actually received the services, items, or assistance related to all expenditures submitted.**
- The receipts/invoices must be in the LEA's name or an individual non-public school administrator/employee and not in the non-public school's name.
- If receipt/invoice is in the non-public school's name:
 - ask vendor to put it in the LEA's name because it is the fiscal agent and resubmit the receipt/invoice to the LEA.

- the non-public school and vendor will need to work out a reimbursement for the non-public school by:
 - either having the vendor reimburse the non-public school before or after it receives the payment from the LEA

Please note... LEAs are to use their districts normal reimbursement documentation forms, policies/procedures. If there are any questions regarding reimbursement approvals, documentation, or need for clarification, contact the State Ombudsman by email... Daphne.Flentroy@la.gov