



## **Temporary Procedure: CARES Act Emergency Financial Aid Grants to Students**

**Sponsor: Business and Administrative Services**

### **Purpose**

The Coronavirus Aid, Relief, and Economic Security (CARES) Act includes a Higher Education Emergency Relief Fund (HEERF) that provides more than \$14 billion in emergency funding to higher education. Of those funds, more than \$6 billion must go directly to students in the form of emergency financial aid grants (HEERF-student share) for expenses related to the disruption of campus operations due to the COVID-19 crisis. On April 9, 2020, the Department of Education (ED) published a list of individual institutional allocations, a certification form that must be signed and returned in order to access the funds, and a letter from Secretary Betsy DeVos outlining ED's implementation of the CARES Act program. On April 21, 2020, ED released additional clarification on student eligibility and allowable uses of HEERF-student share funds. CCC applied for the CARES Act HEERF- student share funds on April 10, 2020 and was awarded \$552,365 on April 27, 2020. Phase two of the CARES Act is not covered in this procedure.

### **Procedure**

The CARES Act Financial Aid Grants to Students is intended to provide emergency financial aid to students affected by COVID-19 for expenses including food, housing, course materials, technology, health care, and child care. CARES Act Student Share funds may not be applied toward tuition or institutional charges. They must be disbursed directly to the student. Coconino Community College (CCC) will use the time period of April 10, 2020 to December 30, 2020 to disburse these funds with heavy allocation to students enrolled in the Spring 2020 semester, who were most affected by the COVID-19 crisis.

The following terms are used interchangeably in the procedure:

1. CARES Act Financial Aid Grants to Students
2. HEERF Student Share funds
3. HEERF Emergency Grants to Students
4. CARES Act Phase 1 funds for students

The CCC Cares Implementation Team determined the three guidelines in awarding CARES Act Financial Aid Grants to Students:

1. Maximize equity by keeping red tape for students to a minimum
2. Maximize impact by ensuring that the application and distribution processes are quick
3. Maximize efficiency by imposing as little administrative burden as possible on program staff

The CCC Cares Implementation Team met and agreed that in totality, all CCC students had incurred additional expenses due to our campus disruption, including campus closure and movement of all classes to on-line venues that occurred beginning March 23, 2020. Quantification of amount of expenses is difficult to ascertain and is not required in the Act, the financial aid staff had learned from students that they had dealt with food price spikes and shortages and an inability to eat food sold at the CCC campus, leading to alternative, more expensive purchases, unexpected child care expenditures, expenditures

related to transportation and relocation to complete school work at alternative locations, technology upgrades and purchases including cable internet and cell contract alterations and overage charges associated with attending classes virtually via cell phone. The CCC Cares Implementation Team determined that financial aid applicants (those with a FAFSA) were all part of the cohort experiencing financial harm due to the campus disruption caused by COVID-19. Based on ED guidance, only students who are or could be eligible to participate in programs under Section 484 in Title IV of the Higher Education Act of 1965, as amended (HEA), may receive emergency financial aid grants. These items specifically are:

1. Financial aid applicants with a 2019-2020 FAFSA that was sent to CCC.
2. Enrolled in a degree or certificate program at CCC.
3. Making satisfactory academic progress.
4. Not owe an overpayment on Title IV grants or loans.
5. Not be in default on a Title IV loan.
6. Filed "as part of the original financial aid application process" a certification that includes
  - a. A statement of educational purpose.
  - b. Student's Social Security Number (SSN).
7. Be a U.S. citizen or national, permanent resident, or other eligible noncitizen.
8. Have received a High School diploma or GED equivalent certification
9. Have returned fraudulently obtained Title IV funds if convicted of or pled guilty or no contest to charges.
10. Not have fraudulently received Title IV loans in excess of annual or aggregate limits.
11. Have repaid Title IV loan amounts in excess of annual or aggregate limits if obtained inadvertently.
12. Have had Selective Service registration verified.
13. Have had Social Security Number verified.
14. Not have a federal or state conviction for drug possession or sale, with certain time limitations.

Systematically and equitably, CCC has selected all students who have a completed FAFSA file that passed and has been verified with all Department of Education HEA484 edit checks and are currently enrolled in a degree or certificate program, are enrolled at least one credit, are making Satisfactory Academic Progress, as of May 7, 2020. Students enrolled in on-line programs have been deemed ineligible. However, students who are taking classes on-line, but are not in an on-line program have been deemed eligible if they meet the other criteria.

HEERF emergency grants are not counted as income for the calculation of Expected Family Contribution (EFC) or estimated financial assistance (EFA) and as such, Financial Aid will make a Cost of Attendance positive negative budget adjustment of the same amount of the CARES award to ensure students are not flagged into an over award situation.

The Spring 2020 awarding and disbursement will take place May 7, 2020. The award amount for all eligible students will be \$600. Additional awarding will take place during Summer 2020 for summer students. Funds may be pro-rated if the allocation balance becomes depleted. Once fund balance becomes depleted, no additional students may be awarded.

### Reporting

As explained in the Funding Certification and Agreement for the Emergency Financial Aid Grants to Students, each institution will report to the Secretary the following:

1. How HEERF-student grants were distributed to students.
2. The amount of each grant awarded to each student.
3. How the amount of each grant was calculated.

4. Any instructions or directions given to students about the grants.

CCC will also comply with the reporting requirements under Section 15011 of the CARES Act and the notice in the Federal Register to be posted by ED at a future date. CCC's first report must be submitted within 30 days of signing the certification form (May 9, 2020), and every 45 days thereafter.

#### Website

A website was set up at <https://www.coconino.edu/cares-grant> to communicate with students, community members and to be transparent for reporting purposes to Department of Education.

#### **Definitions**

None

#### **References**

<https://www2.ed.gov/about/offices/list/ope/caresact.html>

<https://www2.ed.gov/about/offices/list/ope/coverletterhbcumsisiptccu.pdf>

<https://www2.ed.gov/about/offices/list/ope/heerfInstitutionalcertificationagreement42020v2.pdf>

<https://www2.ed.gov/about/offices/list/ope/heerfstudentfaqs.pdf>

Section 484 in Title IV of the Higher Education Act of 1965

#### **Procedure History**

05/08/2020 New Temporary Procedure

#### **Legal Review**

None