

EMERGENCY FINANCIAL AID GRANTS POLICY

1.0 Objective/ Purpose

To disburse emergency financial aid grants directly to students for expenses related to the disruption of campus operations due to coronavirus (including eligible expenses under a student's cost of attendance such as food, housing, course materials, technology, health care, and child care) based on The Coronavirus Aid, Relief, and Economic Security (CARES) Act provided to Gurnick Academy of Medical Arts (the "Academy").

2.0 Documents Used/ Referenced

CARES Student Fund Certification

Attachment 1: Coronavirus Aid, Relief, and Economic Security Act or CARES Act

Attachment 2: Letter of Secretary of Education April 9, 2020

3.0 Who Should Use

Financial Aid Department

Campus Directors

Accounting Department

Process Department

COO

CPO

CEO

4.0 Policy

This policy is to ensure that the above mentioned funds are distributed as widely as possible.

Gurnick Academy is awarding the **CARES Grant equally to every eligible student***. **The Academy is following the guidance provided by the Secretary of Education in the April 9th, 2020 letter (see attached):**

"The CARES Act provides institutions with significant discretion on how to award this emergency assistance to students. This means that each institution may develop its own system and process for determining how to allocate these funds, which may include distributing the funds to all students..."

In addition, the letter states the acceptable student uses of CARE Grant Funds by students:

"expenses related to disruption of campus operations due to coronavirus, including for food, housing, course materials, technology, health care, and child care."

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* Eligible students include all ACTIVE students in core programs as of **April 10th, 2020****, and had their method of delivery changed to a distance education modality due to the Coronavirus pandemic.

Please refer to the **Addendum for more specificities and updates.

Addendum:

On October 6th, 2020 during Gurnick Academy HEERF Executive Meeting further assessment of the eligibility criteria has been discussed. For purpose of awarding remaining HEERF funds during the final round, it has been determined that the eligible students include all ACTIVE students as of **August 1st, 2020**, regardless of the actual disbursement date of the funds to the students.

5.0 Procedure Steps:

Ledger Code will be: **CARES Grant**

This is to be considered a Non–Title IV award and will not be included on the 1098-T or included as Title IV funds in the 90/10 calculations.

The disbursement will be treated as a pass-through award and will be issued in the form of a check made payable directly to the student.

GEGI will send out automatic email to all Active students (as of April 10) with the attachment of CARES Student Fund Certification via Right Signature.

If we receive notification from a student that they do not have significant financial need, they will not be included in the program distribution.

If a grant check is not cashed within 90 days of issue date, the check is to be cancelled and the funds will be reallocated back into the Academy's Student Relief Fund and disbursed to other students at the sole discretion of the Director of Financial Aid after a needs based review. Alternatively, the Academy may choose to return undistributed funds back to the government.

Individual CARES Grant Award disbursements are to be kept and tracked by accounting for reporting every 30 and 45 days as required.

Each student requesting a grant will be required to execute a certification form as to allowable uses of the funds.

The amount of the distribution will be \$950. All student certifications will be processed, starting on **May 8th, 2020** which coincides with the due date for return of all Student Certification Forms (see attached). Accounting will then begin with the appropriate general ledger entries and check production to send to

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the certified students. Any funds remaining after all 'certified' student applications have been paid, will be available for the Financial Aid Department to distribute to financially impacted students based on a needs analysis.

Best efforts will be made to send these grant checks by **May 22nd, 2020** assuming there are no issues with availability of federal funds or the certification return process including the need to update student information such as address changes and name changes.

CALCULATION FORMULA FOR GRANT DISTRIBUTION EXAMPLE:

{Available Student Relief Fund} less {# of Students Certified for the Program} * \$1,200 = Financial Aid Discretionary Fund for High Need Students

For Example: if the fund is \$2,000,000 and 1,500 students sign certifications of need as defined by the secretary, each certified would receive \$1,200. That would leave a \$200,000 discretionary fund for Financial Aid to disburse to high need students (based on a needs based analysis).

The Academy agrees that we have and will continue to pay all of our employees and contractors during the period of any disruptions or closures to the greatest extent practicable, explaining in detail all specific actions and decisions related thereto, in compliance with Section 18006 of the CARES Act.

6.0 Management Measurement / Monitoring

GEGI Student Management System will provide an automatic report indicating all students who have signed and accepted the certification. Campus Directors will be point of contact for problems and concern in regards to the CARES funds. Accounting will review and provide the appropriate distribution of the funds.

7.0 Lessons Learned

- January 7, 2021 – All funds have been disbursed. The final check was issued on December 18, 2020.
 - Total amount disbursed: \$1,739,236.00
 - Total number of students who received financial aid grants: 1600
- October 6, 2020 – The 3rd round of funding to disburse the remaining funds include students who were active as of August 1st.
 - 858 students were eligible for the 3rd round fund distribution.
- August 7, 2020 – As of this date, 1445 students received their financial aid grant.
- June 26, 2020 – Due to the low response from the EFC0 students for the 2nd round of funding, students from the 1st round of funding were added to the list with a reply date of July 10th.
 - 56 students were eligible for 2nd round fund distribution.
- June 25, 2020 – As of this date, 1430 students received their financial aid grant.



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- June 22, 2020 – Information from our FA consultant alerted us that a federal judge ruled that international and undocumented students in California can receive emergency financial aid grants while this injunction is in place.
 - Our legal council advised that this ruling only applies to community colleges.
 - Decision was to not pay non-citizens or those who did not clear that comment code on their FAFSA.
- June 11, 2020 – List of students who received the 1st round of funds and have an EFC0 was sent to Financial Aid.
 - Total of 745 students were identified to have EFC0 and received funds from 1st round.
 - Burke provided verbiage for email communication to students regarding 2nd round of funds. Students who feel that they are eligible should contact their FA by June 26.
 - On June 24, it was discovered that students who had empty EFCs were included in the EFC0 list by accident. The revised number of students is 574 students with EFC0.
- May 29, 2020 – As of this date, 1386 students received their financial aid grant.
- May 18, 2020 – Additional 77 students were identified to be added to the student list.
 - The students were San Mateo and Fresno ASUT students who started in Jan 2019.
- May 15, 2020 – Students have begun to receive their checks. As of this day, 548 students received their financial aid grant.
- May 11, 2020 – Letters were sent to students who were on LOA as they are also eligible, but was not included in the original list.
- May 11, 2020 – Students who did not participate in FA were also notified that they needed to complete FAFSA to determine if they would have been eligible for FA to get the grant money.
- May 5, 2020 – Students identified to not have FA were checked for additional criteria.
 - Selective Service
 - US Citizenship or equivalent
 - SAP
- April 17, 2020 – List of students eligible for the Emergency Financial Aid Grant was determined based on start date and whether the change in delivery method to distance education had affected their education.
 - Total of 1503 students were identified as eligible.
 - Emails were sent to students on behalf of each Campus Director through GEGI.
 - The email contained verbiage to complete the attached certification form, but that form was not included and was to be sent as a separate email.
 - Due to the limitation of RightSignature, only a limited number of certification forms were able to be sent at one time that resulted in students receiving the certification forms over a few days.
 - For students who have a change in address, the Campus Directors are to make the change in GEGI and send an email to Vitaly and Lena informing them of the updated address.
- Policy is based under the Coronavirus Aid, Relief, and Economic Security (CARES) Act CARES Grant Administration Policy/Procedure