



Policy & Procedure on HEERF Fund Student Grants 2020

On March 24th, 2020 L'esprit Academy moved all campuses to temporary distance education in accordance with guidance from the USDOE, NACCAS, and Bureau of Professional Licensing (LARA). This decision was made in accordance with social distancing recommendations released by the President related to Covid-19.

On March 27th, the President signed the CARES Act, which included \$30.75B dedicated to the Education Stabilization Fund of which approximately \$14.23B is set aside for the Higher Education Emergency Relief Fund. Monies in the Higher Education Emergency Relief Fund are allocated proportionately across higher education institutions based upon their relative share of full-time equivalent enrollment of Pell Grant recipients.

The purposes of these grants are to provide emergency financial aid to students for expenses related to the disruption of campus operations due to coronavirus which includes a student's cost of attendance, such as food, housing, course material, technology, health care and childcare.

Under this program, \$89,167 has been allocated to L'esprit Academy in emergency financial aid grants. This money will be awarded directly to students affected by disruption of campus operations due to coronavirus. L'esprit Academy has discretion to determine amount of each grant and distribute the grants in compliance with all applicable laws, including non-discrimination.

*The school believes that all students have been financially impacted by coronavirus and the transition to distance education with regard to cost of attendance as described. Therefore, the emergency grants will be used to assist all eligible students and distributed equally to each student that earned any distance education hours between the dates of **March 13th and April 15th**.*

This allocation policy follows guidance from FAQ from the Dept. of Education regarding which students are eligible to receive emergency financial grants from the HEERF. Specifically, this guidance states that, "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. If a student has filed a Free Application for Federal Student Aid (FAFSA), then the student has demonstrated eligibility to participate in programs under Section 484 the HEA. Students who have not filed a FAFSA but who are eligible to file a FAFSA also may receive emergency financial aid grants. The criteria to participate in programs

under Section 484 of the HEA include but are not limited to the following: U.S. citizenship or eligible noncitizen; a valid Social Security number; registration with Selective Service (if the student is male); and a high school diploma, GED, or completion of high school in an approved homeschool setting.”

Allocation Funds to Students: Grant monies will be divided equally among all students that earned any distance education hours between dates of March 13th and April 15th. The school has identified 125 eligible students based on this criteria. If the final list of eligible students remains at 125, each student will receive \$713.34. This amount is subject to change based on the final student allocation list after all possible students have been fully screened for eligibility.

Should any students decline or be deemed ineligible for funds, any outstanding funds will be distributed equally among future starting students that were not included in the original allocation but did clock any distance education hours after April 15th and July 15, 2020.

We have identified 73 students in this group; these outstanding funds of \$30,673.12 will be divided equally among all students in this cohort.

1. One hundred percent of this first allocation must be used exclusively for student emergency financial aid grants. The first portion for student relief is \$89,167.
2. Engage the institution’s financial aid office, student services team, and other senior leaders to guide this important work. Business office and support staff to be used.
3. Create a separate interest-bearing depository account for the emergency financial aid grants with a bank insured by the Federal Deposit Insurance Corporation or the National Credit Union Administration. Include the phrase federal emergency grant funds in the name of the account. Interest earned on the funds should be repurposed as emergency financial aid grants to students. This process will enable an institution to reject any allegations of using/co-mingling such funds with the school’s general operations. Some institutions have inquired if they can use an existing account, such as one that already handles student disbursements. We discourage this simply to protect an institution from any accusation of using such grants intended for students for other purposes.
4. Create a form (not a contract) of award or attestation that articulates to the student the exact amount of the emergency financial aid grant he or she will receive. If it is given for a specific purpose, include such language. Such an award should have signatures by both the institution’s staff person(s) administering the grant program and the student. Include language, to be signed by the student, which both acknowledges receipt of this amount of emergency assistance and serves as a student’s commitment to using the funds as stated. Although the CARES Act makes clear these grants must go directly to students, you also want some level of protection for the institution if a student uses the funds for a different purpose. Many institutions are requesting that students complete a

request for emergency funds form/application, which documents a student's need for an emergency financial aid grant.

5. L'esprit Academy's cohort of eligible students consists of all students who earned any hours of training via temporary distance education from March 13, 2020 - April 15, 2020. These dates encompass the COVID-19 period as defined both by the school closure as well as the effective date of the US Department of Education announcement of the availability of emergency grants.
6. SMART reports of attendance indicating the eligible students for both campuses will determine attendance portion of cohort.
7. 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 by demonstrating:
 - a. Filed FAFSA or eligible to file for the FAFSA;
 - b. Not in default on NSLDS
 - c. GED or high school diploma or completion of high school in an approved homeschool setting
 - d. U.S.citizenship or eligible noncitizen;
 - e. a valid Social Security number;
 - f. registration with Selective Service (if the student is male)
8. The school will distribute a small amount of emergency financial aid grants to all eligible students immediately, making clear that the funds may only be used for eligible expenses. After these initial funds are disbursed, then invite students to apply for additional funds based on significant financial need.
9. The school is making every reasonable effort to distribute this grant money to eligible students as quickly as possible.
10. An institution should keep detailed accounting records of every emergency financial aid grant (i.e., the recipient's name, how the amount was calculated, the date and amount disbursed, the form of such disbursement, the student's intended use of such funds, and any instructions or directions that the institution gave to the student about the grant). Track and audit all funds carefully. Institutions are expected to file reports with the Department regularly on the use/distribution of the emergency financial aid grants.
11. Funds will be distributed by physical check.
12. Students must sign an acknowledgement/certification/attestation.
13. Funds will be tracked on CARES ACT Student Funds Spreadsheet.
14. Funds will NOT be reported on ledgers.
15. Maintain track of the staff time involved in the management and distribution of the emergency financial aid grants. Keep track of every hour of staff time and account for how every dollar is distributed.
16. Funds report will be posted on website under disclosures (or if other guidance is given) 30 days after funds are received in account through G5, then updated and posted every 45 days after.