



## *Policy and Procedures for Student Relief Funds under CARES Act*

### *Overview:*

*On April 9, 2020, U.S. Secretary of Education Betsy DeVos announced that more than \$6 billion will be distributed immediately to colleges and universities to provide direct emergency cash grants to college students whose lives and educations have been disrupted by the coronavirus outbreak. The funding is available through the Higher Education Emergency Relief Fund (HEERF) authorized by the Coronavirus Aid, Relief, and Economic Security (CARES) Act, signed into law by President Donald J. Trump in March.*

### *School Position and Responsibility:*

*It is CAVT's position that relief funds are being offered to support students who have been financially impacted by the COVID-19 crisis and who are attempting to continue their educational pursuits in spite of these hardships. As well, it is the responsibility of CAVT to administer these funds to eligible students in accordance with the provisions of Section 18004(a)(1) of the CARES Act. The primary responsibilities include the following:*

- a. Obtain assurance that student recipients have been affected by the disruption of campus operations due to the coronavirus,*
- b. Inform student recipients of the allowable expenses that can be covered by these funds:*
  - Food*
  - Housing*
  - Course materials or technology*
  - Health care*
  - Childcare*
- c. Inform student recipients that these funds cannot be held by CAVT for:*
  - Tuition and Fees*
  - Outstanding balances owed to the school*
  - Expenses incurred to provide emergency educational alternative modalities, such as online learning platforms*
- d. Determine the population of students to whom the school will distribute funds. Students who will be included in the population of eligible recipients must:*
  - Be eligible to receive Title IV funds*

- *Be in compliance with regulations that would otherwise jeopardize Title IV eligibility, such as being in default of existing TIV loans or having outstanding overpayments of TIV grants*
  - *Be meeting Satisfactory Academic Progress (either directly or via appeal provisions or meeting the terms of academic plans)*
  - *Have been in attendance in Winter 2020 classes as of March 13, 2020; and continued to attend the Spring 2020 Quarter or took a COVID-19 related leave of absence*
  - *Have been enrolled to begin Spring 2020 classes and are currently in attendance*
  - *Not have been withdrawn or on a leave of absence (LOA) prior to March 13, 2020.*
- e. *Determine the allocation methodology to be used to calculate each student's award:*
- *CAVT has decided that the most equitable means of distribution is to give an equal amount of funds to all eligible students.*
  - *Students who have chosen to take a leave of absence will receive their funds upon returning from their leave.*
  - *Students in attendance will receive their funds within two weeks of the federal deposit of funds into CAVT's bank. NOTE: CAVT does not control or have influence to control when funds will be received.*
  - *All funds will be distributed at one time with no hold backs for future needs, except as noted for students on LOA. CAVT encourages students to be mindful that there may be no other funds available from the US Department of Education in future, and therefore they should be frugal in their use of these funds.*
- f. *Provide required documentation and reporting to the US Department of Education in the timely manner set forth by the provisions in the CARES Act.*

*Student Responsibility:*

*Not all students may have experienced a hardship due to the coronavirus and its impact on their learning experience. Therefore, CAVT will expect students to attest to the following prior to receiving funds:*

1. *Student has been financially impacted as a result of the disruption of campus operations due to the COVID-19 crisis*
2. *Students must acknowledge their understanding that these funds will be used to cover allowable expenses as set forth in the Student Certification Form.*

*Other Related Topics:*

Uncleared or returned checks: After distribution of HEERF student checks, CAVT will monitor the clearing these checks through its bank account. Should a HEERF student check remain outstanding for 60 days or greater, or have been returned as undeliverable, CAVT will:

- Stop payment of the check
- Make no less than 2 attempts to contact the student for reissuance
- If after 30 days, no contact with recipient has been successful, then the funds will be considered available for distribution to other students.

Students who fail to return from LOA: If a student has not returned from LOA by December 31, 2020, the funds set aside for them will be returned to the general HEERF funds for distribution to other students who have remained in school.

Safeguarding of and accounting for funds: CAVT will move all HEERF funds to a bank account separate from its normal operating account. As well, CAVT will record transactions related to HEERF funds in separate General Ledger accounts and specifically identify the transactions as HEERF funds via the use of the "Class" process in QuickBooks.

Recordkeeping and Reporting: CAVT will make available to authorized US officials, including but limited to external auditors, designated US Department of Education personnel and designated State authorities, all records relating to the receipt and distribution of the HEERF funds. Students and parents may have access to records related specifically to their individual distribution in accordance with FERPA and other Privacy regulations. While it is CAVT's intent to be transparent, it must also comply with all other federal and state regulations.

The intent of this document is to provide written guidance and establish a framework under which CAVT will compliantly participate in the receipt and distribution of HEERF funds under the 2020 CARES Act. This policy document is based on information and guidance available as of May 15, 2020 and may require revision or changes based on future guidance.