# Sullivan University Higher Education Emergency Relief Fund Policy and Procedures

The CARES Act, which establishes and funds the Higher Education Emergency Relief Fund (HEERF), directs institutions of higher education ("institutions") to use no less than 50 percent of funds received under Sections 18004(a)(1) and 18004(c) of the CARES Act to provide emergency financial aid grants to students for expenses related to the disruption of campus operations due to coronavirus. Sullivan University understands that eligible expenses include food, housing, course materials, technology, healthcare and childcare. This document sets forth Sullivan University's understanding of the Act based on published guidance, webinars and conference calls with federal and state officials, and in collaboration with auditors and trade associations.

Sullivan University sets forth the following as the foundation for its distribution program:

- Sullivan University will distribute \$1,451,609.00 in HEERF funds to eligible students
- Sullivan University understands that eligible expenses include food, housing, course materials and technology, healthcare and childcare.
- Sullivan University understands that only those students who are Title IV eligible may receive
  funds from this program. To comply with this requirement, Sullivan University will require a
  student to have completed a FAFSA and eligibility established before approving and disbursing
  HEERF funds.
- Any student enrolled in a <u>program</u> that is only available all-online from March 13, 2020 forward is ineligible for participation. Those include:
  - AS Community Health Services
  - o AS Health Information Management
  - Medical Coding Diploma
  - BS Human Resource Leadership
  - BS Hospitality Management
  - Computed Tomography
- Given institutions have one year to disburse funds, and given a common understanding among other institutions, Sullivan University understands that disbursements may be made to students in terms that begin subsequent to March 13, 2020.
- Sullivan University understands, agrees with and supports the fact that relief funds may not be used in any way as an incentive to enroll.
- Students eligible for a disbursement must actively affirm, in advance, that they have need in one or more eligible categories, and that the need is the result of factors related to the disruption of campus operations due to coronavirus.
- Students will be required to submit an attestation that the information they have provided is true and correct; that they are Title IV eligible, and that their awarded funds will be used for eligible expenses under a student's cost of attendance in the calculation of Federal Financial Aid, such as food, housing, course materials and technology, health care, and child care. Each student will attest to their understanding and the money received is intended to cover expenses related to the disruption of campus operations.
- Sullivan University understands that disbursements may be made by check or debit card.

- Sullivan University understands that funds designated for students may not be used to reimburse the institution for any costs related to coronavirus, or administration of this program as fiduciary.
- Sullivan University understands that funds may not be used by the institution to pay down a student's obligation to the institution. Rather, grants must be paid out directly to eligible students for use toward approved expenses.
- Sullivan University understands that reporting requirements are stipulated by the U.S.
   Department of Education that require an initial report with 30 days of application for funds.
   Subsequent reports will be due 45 days thereafter.
- Sullivan University will develop a repository to hold all records related to the application for and
  disbursement of HEERF funds. The repository will include documentation of HEERF funds made
  available to Sullivan University; copies of notifications sent to students; copies of each student
  attestation and rubric; copies of each notification to each student announcing award; evidence
  and documentation of the date and manner of disbursement of each student's grant; copies of
  reports forwarded to the U.S. Department of Education and other authorities, as required.
- Sullivan University understands that institutions have broad discretion to determine how best to award funds to students, subject to the qualifying criteria stipulated in the Act, and reaffirmed herein.

In consideration of the above understandings, Sullivan University has crafted its Plan to provide HEERF funding to students based on the following.

#### STEP 1 – Students Will Receive the Following Email:

To: All Students

Subject: CARES Act - Higher Education Emergency Relief Fund (HEERF) Availability

As a result of disruptions caused to post-secondary students by the coronavirus, the U.S. Congress has made funds available to help mitigate the impact as it relates to several categories. This email is to advise all students that \$1,451,609.00 of HEERF funds are now available for distribution through this Act. Sullivan University has developed a Plan to provide limited funds to impacted students through an attestation process that provides grants to eligible students on a first-come, first-served basis, while funding lasts.

Eligible students were identified following this criteria:

- Funds are available for 5 categories which include:
  - o Food, Housing, Course Materials and Technology, Healthcare, Childcare
- Students must have completed a FAFSA and be eligible for any type of Title IV Financial Aid
- Students enrolled in an all-online program prior to March 13, 2020 are not eligible for participation. This limitation was written into the CARES Act authorized by Congress. Sullivan University has no control or ability to disregard this limitation. Those programs include:
  - AS Community Health Services
  - o AS Health Information Management
  - o Medical Coding Diploma
  - o BS Human Resource Leadership
  - BS Hospitality Management
  - Computed Tomography
- Eligible students will receive \$500. Students with an Expected Family Contribution (EFC) of \$0.00, as determined by the FAFSA, may receive an enhancement of \$250.00.
- The maximum amount awarded to any one student at this time is \$750.00

Once approved and before disbursement of funds, students must complete an attestation certifying that (1) The information provided in the attestation is true and correct to the best of the student's knowledge; (2) The student is eligible for Title IV Federal Financial Aid; (3) That student understands that any money awarded from the grant is to be used for expenses related to the disruption of campus operations due to coronavirus. Expenses include eligible expenses under a student's cost of attendance in the calculation of Federal Financial Aid, such as food, housing, course materials and technology, health care and childcare. Money received through this grant is intended to cover expenses related to the disruption of campus operations.

For the purposes of notifications and administration of this program, and, because external email addresses cannot be verified for security and authenticity, **Sullivan University officials will ONLY communicate with students through their Sullivan University Student Email account**.

If Sullivan University has determined you have eligibility based on the above criteria, you will receive an attestation form to complete in your student email. If you are approved for the HERRF grant, you will receive an email confirmation that your funds will be disbursed through our normal stipend process to

your designated account with BankMobile. If you believe you meet all the following criteria, but did not receive an attestation form via email, please contact Financial Planning @ <a href="slvfinplan@sullivan.edu">slvfinplan@sullivan.edu</a>.

#### **Step 2– Student Completes Attestation:**

Email goes out to students we have identified as eligible:

Dear <Student>,

Sullivan University has determined you may have eligibility for the HEERF grant as a result of disruptions to campus operations caused by the coronavirus.

Please complete the Attestation form by following this link: INSERT LINK

If you are approved for the HERRF grant, you will receive an email confirmation that your funds will be disbursed through our normal stipend process to your designated account with BankMobile. If you are not approved, you will receive email confirmation of that as well.

Thank you,

**Financial Planning** 

Once eligible students have been identified, the student will be emailed a link to complete the following attestation web form.

# Sullivan University CARES Act – HEERF Attestation

Section 18004 CARES Act - Student Acceptance of Emergency Financial Aid ("Aid")

Student Name:	
Student Number:	
Mailing Address:	
Phone number(s):	
Sullivan University Student Email Address:	

If deemed eligible, I accept the grant award provided to me from funding made available to my institution under the CARES Act.

I certify the following:

- All information provided as part of this attestation is true and correct to the best of my knowledge.
- I am eligible for Title IV Federal Financial Aid, as verified by the FAFSA.
- I was not enrolled in any of the following online programs prior to March 13, 2020, as none are eligible for participation: Those programs include:
  - AS Community Health Services
  - o AS Health Information Management
  - Medical Coding Diploma

- o BS Human Resource Leadership
- o BS Hospitality Management
- Computed Tomography
- I understand that any money awarded from this grant is to be used for expenses related to the disruption of campus operations due to coronavirus. These expenses include eligible expenses under a student's cost of attendance in the calculation of Federal Financial Aid, such as food, housing, course materials and technology, health care, and childcare. The money I am receiving is intended to cover my expenses related to the disruption of campus operations.
- I agree and consent to use an e-signature, but typing my name and date below.

#### **SUBMIT**

#### <u>Step 3 – Processing Attestations:</u>

Students who indicate a need as a result of coronavirus will receive up to \$500. Students with an Expected Family Contribution (EFC) of \$0.00 may receive an enhancement of \$250. The rubric used to determine eligibility for funds is as follows:

## **Sullivan University HEERF Application Eligibility Rubric**

Student Name:			
Student ID Number:			
Is student's EFC 0?		Yes / No*	
Is student Title IV Eligible:		Yes / No*	
Was student in one of these all-online program prior	to March 13, 2020:		
<ul> <li>AS Community Health Services</li> </ul>			
<ul> <li>AS Health Information Management</li> </ul>			
<ul> <li>Medical Coding Diploma</li> </ul>			
<ul> <li>BS Human Resource Leadership</li> </ul>			
<ul> <li>BS Hospitality Management</li> </ul>			
<ul> <li>Computed Tomography</li> </ul>			
		Yes* / No	
Is student currently active:		Yes / No*	
* Student is NOT eligible for funding under the HEER	F		
*Student NOT eligible for EFC enhancement			
Based on stated criteria, is student eligible for funds?	?	Yes / No	
Calculation of Grant Amount:			
Student has affirmed a need, caused by coronavirus,	for any of the following c	ategories:	
Food, Housing, Course Material and Technology, Hea	althcare and/or Childcare	Yes / No	
Award amount		\$500	
Zero EFC Enhancement		\$250	
Total Award:			
	/ /	/ /	
Name of awarding official	Date of decision	Date student notified	

### <u>Step 4 – Student Disbursement Notification</u>

Once the stipend has been processed and sent to BankMobile, student will receive disbursement email:

Dear Student,

Your HEERF grant is approved and has been sent to BankMobile. Please allow 24-72 hours for your funds to be available through your elected account with BankMobile.

Thank you,

Financial Planning slvfinplan@sullivan.edu

#### Or:

Dear <Student>,

After reviewing your criteria for eligibility, it has been determined you are not eligible for HEERF funds at this time. If you have any questions, please email slvfinplan@sullivan.edu

Thank you,

**Financial Planning** 

#### **Step 5 – Funding and Documentation**

Upon receipt of an electronically signed attestation, the Senior Director of Financial Planning will notify the Program Coordinator (Sullivan University's Fiscal Officer) to disburse the approved amount of funds to the student by posting the funds to his/her ledger card in such a manner that prevents the funds from being applied in any manner that is not consistent with the requirements of this program. Immediately after the funds are posted to the ledger, they will be released to the student through the BankMobile system.

Both the Senior Director of Financial Planning and the Fiscal Officer will be responsible for ensuring all necessary documents are retained and uploaded to the appropriate repository for documentation and record keeping.

The Fiscal Officer, in conjunction with the Vice President for Accounting, will take all necessary steps to ensure all funds are accounted for, and that HEERF funds are not co-mingled with any other funds.