

Mt. San Antonio College
CARES Act Plan
D – R – A – F – T

BACKGROUND

Letter from The Secretary of Education – April 9, 2020

Betsy DeVos

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 or only to students who demonstrate significant need.** [**

NOTE: THIS PROVISION CHANGES ON 4.21.20]

The only **statutory requirement** is that the **funds be used to cover 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).** With that said, I would like to encourage the leadership of each institution to prioritize your students with the greatest need, but at the same time consider establishing a maximum funding threshold for each student to ensure that these funds are distributed as widely as possible.

In order to access these funds, all institutions must **sign and return the Certificate of Funding and Agreement via: grants.gov** (<https://www.grants.gov/web/grants/applicants/registration.html>), acknowledging the terms and conditions of the funding. After the Department has received the certificate, institutions may draw down their emergency assistance funds using the Department's G5 system. The Department is also working expeditiously to allocate the remaining funding that is reserved for institutional use, and we will provide details on how institutions may apply for this institutional funding, as well as for other emergency funding, in the coming days.

- Mt. SAC's allocation is \$17,457,959.
 - 75% of the funds awarded based on institution's full time in-person Pell grant recipients as a share of the national total.
 - 25% of the funds awarded based on the institution's full time in-person enrollment who are not Pell Grant recipients as a share of the national total.
- \$8.7 million (50%) to students directly: original language on 4.9.20 said: open to assisting all students – those qualifying for financial aid, and those not – our interpretation was including Dreamers.
- The second \$8.7 million – will get guidance in 2 weeks –perhaps we can go backwards to cover costs of computers. This came out 4.21.20

GUIDANCE [EAB]

Within 30 days after filing our Certification and Agreement Form, "you must **report your policy for distributing the funds to students** to the Department of Education (ED) within 30 days. The totality of funds must be spent within one year of signing the agreement. ED strongly recommends distributing the funds as quickly as possible." Also, "these funds are not considered financial aid under Title IV of the Higher Education Act. They do not impact cost of attendance or EFC calculations." Funds will be made available immediately through the Title IV G5 system.

On April 14, ED provided clarification related to GEERF – Governor Emergency Education Relief Fund. CA get \$354.5 million - -that is for K-12 through higher ed. States have to establish their criterion to determine which schools are most impacted and to support essential emergency education operations.

ED has provided [updated guidelines](#) on April 9, 2020 for emergency CARES Act grants that stipulates:

- The funds can only be used to provide direct grant assistance to students
- Universities must make these funds available to students as soon as possible
- Institutions cannot use these funds to reimburse themselves on any incurred costs or expense, including refunds or aid previously issued to students
- Institutions have discretion over how to award aid with a few provided guidelines instead of mandates
 - Institutions should prioritize students with the greatest need and factor in student socioeconomic status
 - Institutions can elect to award aid to all their students aid or award aid only to those who have demonstrated need
 - ED recommends, but does not require, using the maximum Federal Pell grant (for the 2019-2020 academic year, \$6,195) as the maximum amount of aid awarded to each student
- Financial aid administrators should exercise “professional judgement” on a case-by-case basis to exclude this emergency aid from a student’s cost of attendance
- Emergency student aid will not be counted as Title IV aid
- Institutions will need to report in 30 days how they distributed the funds

Institutional Funding

The remaining balance of funds can be used for most costs incurred by COVID-19, including the shift to online instruction. Importantly, it excludes certain enrollment expenses, like payments to marketing vendors, and capital expenses associated with athletics facilities.

Released 4.21.20

Department of Education Announces Availability of Second Half of the Higher Education Emergency Relief Fund & Additional Clarity on Use of Funds

The Department announced today that the institutional share of the Higher Education Emergency Relief Fund under the CAREs Act is now available to institutions. A letter from Secretary DeVos announcing these funds can be found [here](#). This additional \$6.2 billion comes after the Department made funds for the emergency grants to students portion available [on April 9, 2020](#).

In order to access the funds, higher education institutions must submit a Certification and Agreement for Recipient Institutional Costs, which can be found [here](#). Institutions must also have executed the Certification and Agreement for Emergency Financial Aid Grants to Students before submitting the second certification and agreement.

The Department provided an [FAQ](#) document to clarify allowable uses for the institutional share of the Higher Education Emergency Relief Fund. Some key points follow:

- Institutions may reimburse themselves for refunds of room, board, and fees to students
- Institutions may make additional emergency financial aid students from these funds
- Institutions are permitted to pay for fees and services incurred by students in the transition to online education
- Funds will not be treated as revenue for the purposes of calculating an institution’s 90/10 score

The Department additionally shared an [FAQ](#) document regarding the use of funds from the Emergency Financial Aid Grants to Students portion of the CARES Act. Some of the key points follow:

- **Grants to students** may not be applied to their institutional accounts, they **must be provided to students directly** using checks, electronic transfer payments, debit cards, and payment apps that adhere to the Department’s requirements for paying credit balances to students
- **Grants cannot be applied to outstanding balances** or used to create scholarships for the next term
- Grants cannot be used to reimburse institutions for refunds given to students or for IT equipment or other items procured for student.
- Institutions may only reimburse themselves from the Student Emergency Grants share if they provided emergency grants given to eligible students as a result of disruptions on their education from COVID-19 on or after March 27, 2020.

Finally, the Department clarified that **funds from either the Institutional share or the emergency grants to students can only be given to Title IV eligible students**. These funds are also only available to students who were not exclusively enrolled in an online program at the time of the national emergency declaring on March 13, 2020.

Additional information on the Higher Education Emergency Relief Fund from the CARES Act, including the allocations to institutions and instructions on how to apply for the funds, can be found [here](#).

Department of Education 4.21.20

Institutional Share

The CARES Act establishes and funds the Higher Education Emergency Relief Fund (HEERF). Institutions of higher education are allowed to use up to 50 percent of the funds they receive to cover any costs associated with significant changes to the delivery of instruction due to the coronavirus so long as such costs do not include payment to contractors for the provision of pre-enrollment recruitment activities, including marketing and advertising; endowments; or capital outlays associated with facilities related to athletics, sectarian instruction, or religious worship (collectively referred to as “Recipient’s Institutional Costs”).

The Department provided an [FAQ](#) document to clarify allowable uses for the institutional share of the Higher Education Emergency Relief Fund. Some key points follow:

- Institutions may reimburse themselves for refunds of room, board, and fees to students
- Institutions may make additional emergency financial aid students from these funds
- Institutions are permitted to pay for fees and services incurred by students in the transition to online education
- Funds will not be treated as revenue for the purposes of calculating an institution’s 90/10 score

Q: *May institutions use the funds for Recipient’s Institutional Costs to purchase laptops, hotspots, or other information technology equipment and software to enable students to participate in distance learning as a result of a significant change to the delivery of instruction due to the coronavirus?*

May institutions use those funds to reimburse themselves for computers already purchased for and distributed to students?

Yes. Institutions may use the funds for Recipient’s Institutional Costs to **purchase equipment or software, pay for online licensing fees, or pay for internet service to enable students to transition to distance learning** as such costs are associated with a significant change in the delivery of instruction due to the coronavirus. Additionally, institutions that purchased computers or other equipment to donate or provide to students on or after March 13, 2020, the date of the Proclamation of National Emergency, may reimburse themselves for such computers or other equipment from the funds for Recipient’s Institutional Costs.

Q: *May institutions use the funds for Recipient’s Institutional Costs to make additional emergency financial aid grants to students?*

Yes. Institutions may use the funds for Recipient’s Institutional Costs received through the HEERF under Sections 18004(a)(1) and 18004(c) of the CARES Act to **make additional emergency financial aid grants to students**, provided that such emergency financial aid grants are 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). Additionally, as explained in the Frequently Asked Questions about the Emergency Financial Aid Grants to Students under Section 18004 of the CARES Act, **students must be eligible to receive emergency financial aid grants, and 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.**

Q: *May institutions that provide both online and ground-based education use the funds for Recipient's Institutional Costs to provide emergency financial aid grants to students who were enrolled exclusively in online programs prior to the national emergency?*

No. At institutions that provide both online and ground-based education, those students who were enrolled **exclusively** in **online programs** on March 13, 2020, the date of the Proclamation of National Emergency, are not eligible for emergency financial aid grants

Q: *May institutions use the funds for Recipient's Institutional Costs to award scholarships or to provide payment for future academic terms?*

It depends. As long as awarding scholarships and providing payment for future academic terms are costs associated with significant changes to the delivery of instruction due to the coronavirus or, if provided to students in the form of emergency financial aid, are for expenses related to the disruption of campus operations due to coronavirus, such uses are allowable.

You must complete and submit the CARES HEERF Certification and Agreement Student's Portion before submitting the CARES HEERF Certification and Agreement for the Institution's Allocation of HEER Funds.

The funding opportunity number is ED-GRANTS-042120-004. If you have questions concerning this program, please submit them via e-mail to HEERF@ed.gov, or by phone, at 202-377-3711.

Department of Education 4.21.20

Emergency Financial Aid Grants

The Department additionally shared an [FAQ](#) document regarding the use of funds from the Emergency Financial Aid Grants to Students portion of the CARES Act. Some of the key points follow:

- Grants to students may not be applied to their institutional accounts, they must be provided to students directly using checks, electronic transfer payments, debit cards, and payment apps that adhere to the Department's requirements for paying credit balances to students
- Grants cannot be applied to outstanding balances or used to create scholarships for the next term
- Grants cannot be used to reimburse institutions for refunds given to students or for IT equipment or other items procured for student.
- Institutions may only reimburse themselves from the Student Emergency Grants share if they provided emergency grants given to eligible students as a result of disruptions on their education from COVID-19 on or after March 27, 2020.

Finally, the Department clarified that funds from either the Institutional share or the emergency grants to students can only be given to Title IV eligible students. These funds are also only available to students who were not exclusively enrolled in an online program at the time of the national emergency declaring on March 13, 2020.

Q: *Can institutions that have provided information technology hardware (such as laptops, hotspot internet devices, etc.) and other related equipment to students reimburse themselves from the funds for the emergency financial aid grants to students?*

No. The CARES Act requires institutions to provide the emergency financial aid grants to students.

Q: *Can institutions that have continued to pay student workers from institutional funds for campus jobs reimburse themselves from the funds for the emergency financial aid grants to students?*

No. The CARES Act requires institutions to provide the emergency financial aid grants to students, and institutions may not use that portion of the HEERF set aside for emergency financial aid grants to students for this purpose.

Q: *Can institutions use the funds for the emergency financial aid grants to students to pay outstanding or overdue student bills to institutions?*

No. The CARES Act requires institutions to provide the emergency financial aid grants to students.

Q: *What data will the Department require institutions to **report** after disbursement of emergency financial aid grants to students?*

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: **how grants were distributed to students, how the amount of each grant was calculated, and any instructions or directions that the institution gave to students about the grant.** Institutions must also comply with the reporting requirements under Section 15011 of the CARES Act. The Department will publish a notice in the Federal Register to provide instructions to institutions on these reporting requirements.

Q: ***What students are eligible to receive emergency financial aid grants*** from the HEERF?

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.

Q: *At institutions that provide both online and ground-based education, are students who were enrolled **exclusively in online programs** prior to the national emergency due to the coronavirus eligible to receive emergency financial aid grants?*

At institutions that provide both online and ground-based education, **those students who were enrolled exclusively in an online program on March 13, 2020**, the date of the President's Proclamation, "Declaring a National Emergency Concerning the Novel Coronavirus Disease (COVID-19) Outbreak," Federal Register Vol. 85, No. 53 at 1533738, **are not eligible for emergency financial aid grants**. The formula provided by Congress for calculating the distribution of funds to institutions excludes students who were exclusively enrolled in distance education courses.

Mt. SAC Guiding Principles

- Provide financial aid (Title IV) students still enrolled with additional support dollars:
 - Documented need -- Spring 2020 Federal Aid recipients still enrolled full time
 - Documented need – Spring 2020 Federal Aid recipients still enrolled 6 or more units
 - Documented need – Spring 2020 Federal Aid recipients now enrolled less than 6 units
- Provide students with the greatest financial need with the greatest amount:
 - Unmet financial need based on FAFSA
- Considerations for aid recipients:
 - Provide greater amount for students NOT receiving Cal Grant
 - Include assistance to students NOT receiving Pell but receiving CCPG waiver
- Provide all credit students still enrolled in 6 units or more with some kind of compensation
- Maximize assistance to the highest need students:
 - Foster Youth: [\$42 million] support for foster families (\$1.7 million); support for youths turning 21 to stay in the system and receive support (\$1.9 million); laptops and cell phones to foster youth
 - Dream: CA assistance for undocumented immigrants [\$125 million]—application in May—estimated undocumented adults will receive \$500 one time with households capped at \$1,000 **Recommend using SEAP funds for DREAM students**
 - Establish a set aside for urgent needs for specialized student populations—foster youth, Dream
- Provide some type of assistance to **non credit** students – prioritize based on type of enrollment??
- Other possible sources of funding:
 - 2nd 50% of CARES Act funding
 - SEAP – per AB 943 and 2.26.20 SS 20-01 from CCCCCO—“emergency student financial assistance”
- Other priorities/strategies:
 - Set aside for fall
 - Develop summer incentives
 - Set aside for critical/emergency situations

Mt. SAC Enrollment #s for Spring 2020

	at census	4.21.20
# students enrolled in 12 or more units		
# students enrolled in 6-11.9 units		
# students enrolled in < 6 units		
TOTAL		

MT. SAC FINANCIAL AID INFORMATION -- CARES Act Strategy

Category	2019-20 #	Spring 2020 # start	Spring 2020 # 4.20.20
Pell grant recipients	11,819	9,167	8,510
<i>Students pending</i>			84
CCPG waiver ONLY recipients – no Pell	5,255	5,930	5,152
CA DREAM Act recipients also receiving CCPG waivers	666		
CA DREAM Act ONLY recipients – no CCPG	26	43	35
<i>Total aid recipient counts</i>	17,100		13,697
Total Title IV recipients [minus CCPG only; minus DREAM]			8,510
Students with incomplete FAFSAs			901
Students incomplete for Pell grant review and no CCPG			75
Students incomplete for Pell grant review but have CCPG			826

Cal Grant students	2,019		2,019
Pell grant students with no Cal Grant	6,674		6,674
# students receiving Pell for Spring still enrolled – 4/20/20			8,510
# students @ full time enrollment for Spring 2020 as of census – 3/9/20 and still enrolled full time – 4/20/20		5,329	3,454 (40%)
# full time students now at three-quarter time (9 to 11.5 units) for Spring 2020 –4/20/20			1,071
# full time students now at half-time (6 to 8.9 units) for Spring 2020 – 4/20/20			475
# of full time students now at less than half-time (.5 to 5.9 units) – 4/20/20			183
# of full time students now enrolled less than full time			1,729
# of full time students now completely withdrawn (0 units) – 4/20/20			146
Students with unmet financial need (total still enrolled 4/20/20)			8,492
No unmet need			18
\$1 - \$1,000 unmet need			20
\$1,001 to \$5,000 unmet need			740
\$5,001 to \$10,000 unmet need			3,357
\$10,001 to \$20,000 unmet need			3,850
\$20,001 + unmet need			525
STUDENTS WITH UNMET NEED OF \$5,000 OR HIGHER			7,732

By the Numbers

REVISED 4.21.20

Running Total

Plan for Spring 2020

	\$8,700,000
Pell recipients still enrolled (6,674) with no Cal Grant receive \$500 each = \$3,337,000	\$5,363,000
Pell recipients still enrolled (2,019) with Cal Grant receive \$300 each = \$605,700	\$4,757,300
Pell students with highest unmet need (7,732) receive \$200 each additionally = \$1,546,400	\$3,210,900
Students receiving CCPG waiver only – no Pell (826) receive \$300 each = \$247,800	\$2,963,100
Credit students still enrolled Sp 2020 (NO AID) receive \$200 each (est 12,000*) = \$2,400,000	\$ 563,100
[11,467 as of 4.20.20]	
Out-of-state Pell recipients (est. 100) receive \$500 = \$5,000	\$3,205,900

Plan for Summer 2020

Pell recipients not qualifying for Summer Pell, enrolled in 6/+ units @ \$1,000 each
Pell recipients qualifying for Summer Pell enrolled in 6/+ units @ \$500 each
Pell recipients not qualifying for Summer Pell, enrolled in min 3 units @ \$500 each
Pell recipients qualifying for Summer Pell enrolled in min 3 units @ \$300 each
**Summer Incentive: students needing courses to grad or transfer = \$500 additional
Promise+Plus students enrolling in Summer Bridge or STEP, FAFSA-eligible @ \$200 each

SEAP Funds

Spring: CA Dream Act students (est. 692) @ \$700 each = \$484,400
Summer: @ \$1,000 each for 6/+ units (est. 150) = \$150,000
Summer: @ \$500 each for 3 units (est. 200) = \$100,000
Summer: @ \$500 grad/transfer incentive (est. 50) = \$ 25,000
\$759,400

Receiving Aid = 13,697

Pell grant = 8,510

Waiver = 5,152

Dream Act only = 35

Credit enrollment = 25,164

Noncredit enrollment = 14,922

From Jenny:

of students receiving Pell for 2019-20 **11,819** students currently receiving Pell Grant payments for 2019-2020.

% of credit enrollment of Pell students (if you don't know I can compute) not sure

of students (estimated) still pending to receive Pell for current year **84** students with Pell Grant offers pending disbursement (I will try to get you #students with incomplete files and have potential Pell eligibility based on estimated EFC)

of CA Dream Act students **692** students with CADAA and enrolled (666 receiving CCPG)

of CCPG waiver ONLY students **5,255** students with CCPG waiver ONLY and no Pell Grant

11,819 Pell

26 CADAA

5,255 CCPG only

17,100

84 students pending

901 student incomplete; 826 of the 901 have CCPG waivers

If divide 17,100 from \$8.7 million = \$508.77

If divide 23,000 from \$8.7 million = \$378.26

Few more questions:

- Of those awarded Pell for 2019-20, how many still have an 'unmet need' and is there a way to figure out both the range in dollars of the unmet need and an average? President potentially wants to give CARES Act \$ to those with unmet need.

- There are 8,510 Pell Grant recipients for spring 2020 (currently still enrolled). Please see the Unmet Need data by range below.

Unmet Need Range	# Students
0	18
1 - 1000	20
1001 - 5000	740
5001 - 10,000	3357
10,001 - 20,000	3850
20,001+	525

Of students who were paid as full time 12 units for Spring 2020 do we know how many have dropped units? 5,329 students were paid full-time Pell Grant for spring 2020 (FA Census/Freeze unit load). Please refer to the grid below for full-time Pell Grant recipients and their current enrollment load as of today.

Full-time Pell Payment @ Census (March 9, 2020)	Enrollment Load as of today (April 20, 2020)	# Students	Comment
5,329	Full-time (12 units or more)	3,454	No impact
5,329	Three-quarter time (9 to 11.9 units)	1,071	No Pell Adjustment; May impact SAP Completion % but will be waived if due to COVID-19
5,329	Half-time (6 to 8.9 units)	475	No Pell Adjustment; May impact SAP Completion % but will be waived if due to COVID-19
5,329	Less-than-half time (0.5 to 5.9 units)	183	No Pell Adjustment; May impact SAP Completion % but will be waived if due to COVID-19

Of those who have dropped units, do we know how many are below 6 units? 183 students. How many have at least 6 units? 1,546 Students.

- If student has fallen below 6 units and hadn't yet received their entire Spring 2020 distribution, are we cutting back the award? No. As long as the student has NOT completely withdrawn from Mt. SAC, Pell Grant payment is based on the student's FA unit load at Census (2 weeks into the term).

- Of the students receiving GI Benefits, how many are also receiving Pell? 205 students

- How many students are receiving Cal Grants? 2,019 students. If we subtract Cal Grant recipients from Pell recipients, how many Pell are left? 6,674 students receiving Pell Grants but no Cal Grants

- Re: summer can you please reexplain to me "Summer Pell" – how it works, who gets it, how much, etc.? Summer 2020 is a trailer term for the 2019-2020 aid year. Students who are enrolled for the summer term will be eligible for Pell Grant as long as they still have remaining Pell Grant eligibility for the 2019-2020 aid year.

Example: Student A has EFC = 0 (\$6,195 full-time Pell Grant). If Student A was enrolled full-time for fall 2019 and spring 2020 and already received \$6,195 full-time Pell Grant, Student A will not have remaining Pell Grant eligibility for summer 2020.

Example: Student B has EFC = 0 (\$6,195 full-time Pell Grant). If Student B was only enrolled half-time in fall 2019 and full-time in spring 2020, Student B has remaining Pell Grant eligibility (25%) for summer 2020.

**Note: Students with 6 units or more enrollment for summer 2020 may be eligible to for the 150% Pell (pending other eligibility criteria).*

Beginning with the 2017-2018 aid year, the U.S. Department of Education brought back the "Year-Round Pell" concept to provide students the possibility of receiving up to 150% of their scheduled award for an award year (fall, spring and summer terms) in effort to help students graduate sooner than later.

Traditionally, a student receiving full-time Pell Grant in the fall term (50%) and full-time Pell Grant in the spring term (50%) would not receive Pell Grant in the summer term. With Year-Round Pell (up to 150%), a student may be eligible to receive full-time Pell Grant in the fall term (50%), full-time Pell Grant in the spring term (50%) and full-time Pell Grant in the summer term (50%). Of course, the student has to meet certain criteria such as enrolling in a minimum 6 units, has not exhausted 600% Pell lifetime usage limit, etc..

That's correct. Students who already received 100% of their Pell Grants for fall 2019/spring 2020 and will be enrolled in 6 units or more for summer 2020 will be reviewed for the possibility of receiving Pell Grant beyond 100% (up to 150%) providing that they meet other eligibility requirements.