

CARES Act Policy and Procedures
Higher Education Emergency Relief Fund
International School of Skin, Nailcare and Massage Therapy

POLICY:

This policy will be used to set forth to administer the guidelines issued by the Department of Education for the CARES Act 2020. Students must be Higher Education Act (HEA) Title IV eligible to receive emergency grant funds. Originally, Institutions could not provide emergency grant aid to students who were enrolled exclusively in an online program on March 13, 2020 and thereafter. In addition, upon original guidelines, only students receiving Pell grants were to be included. Both of these criteria/delineations were amended. Going forward, students receiving Pell and Direct Loan aid were to be made eligible for the Cares Act. Students who have elected to fully fund their own educations (cash pay students) are not entitled to any disbursements from this Fund. A further guidance was issued that stated that cash pay students who wished to possibly be considered for the Emergency Fund, would need to process a FAFSA and determine if they would be eligible for Financial Aid. Students who are funded by both VA and Pell are eligible to participate in the Fund.

Students are expected to use the emergency relief funds for expenses related to the disruption of their educational pursuits due to the Coronavirus outbreak, including Food; Course Materials; Technology; Health Care; Housing and Child Care. Students on LOA (due to Covid-19 related situations), can receive funds after they return from LOA. If a student withdraws from a program, prior to the second disbursement, there will be a forfeiture of the second installment. All students who were currently enrolled up to, and including, May 11, 2020 will be eligible for the funds provided they meet the qualifications in the Procedure I in this policy.

For the Institutions: Emergency Relief Funds cannot be used to reimburse an institution for technology provided to students; but the institution can use the Institutional Aid portion for this purpose. Institutions may not use emergency grant aid to satisfy a student's outstanding balance with the institution. However, the student may choose to use funding after receiving it from Institution to pay on any outstanding balance with the Institution.

PROCEDURE – Part I: The Institution received \$77,102.00 for the Student Higher Education Relief Fund on May 11, 2020.

1. Institution will determine a complete list of the following:
 - a. Pell and Title IV eligible students (129)
 - b. VA only (5 students)
 - c. VA and Pell /Direct Loan eligible students (5)
 - d. Cash Pay students eligible (16)
 - e. Cash Pay students who may elect to apply for FAFSA (15 – 1 student *d * not eligible to apply for FAFSA)
2. Institution will keep strict records (via spreadsheet) with student's name; amount of disbursement; dates of disbursements and method of payment to student.
3. For students who forfeit the second disbursement of their eligible funding by withdrawing; the funding remaining will be equally re-divided among the then currently attending students who qualified from the original pool affected by Covid-19.

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4. Students who have graduated between the first disbursement and the scheduled second disbursement will receive their second disbursement on their graduation date.
5. Students who graduated **before** the Funds were deposited into the Cares Account are not eligible for any disbursement. These students were not included in the cohort when the funds arrived as they were not listed as a currently attending student. Incomplete graduates are included in the cohort as they are being incomplete due to the COVID-19 issue.

PROCEDURE – Part II:

The International School of Skin, Nailcare and Massage Therapy (ISSNMT) will identify all students currently enrolled (including those on LOA or an incomplete graduate) who are eligible or potentially eligible for Title IV funding. A separate list will be generated of those that are: 1) Cash Pay only; 2) VA only; and 3) VA and Pell. See attached Appendix 1.

1. Once the full list is determined; students who are Cash Pay, will be advised of their ineligibility; however, they may complete to determine if, due to special circumstances, they would now be Pell or Direct Loan eligible.
 - a. The process will include review for Professional Judgement consideration by the Director of Financial Aid.
2. Once Students are fully identified, the institution will disburse in the form of check:
 - a. Step 1: Provide an initial disbursement of \$250.33 to currently eligible students identified in 1a and 1c of Procedure Part I. The checks will be disbursed to students on or before May 22, 2020. A total of \$32,293.57 will included in the first disbursement.
 - b. Step 2: \$10,013.20 will be withheld, and the Fund reduced by this amount until June 2, 2020, for students who potentially may qualify for Pell Grants or Student Loans. Students seeking to apply for Federal Financial Aid and be considered for Professional Judgement must complete the process no later than May 29, 2020. The \$10,013.20 withheld for these students will expire on June 2, 2020 and the Funds reallocated for all remaining eligible students for the second and final disbursement.
 - c. Step 3: The second disbursement will be provided to all identified and eligible students on or before August 3, 2020. The second disbursement may include funds not disbursed from students who withdrew and/or did not apply for Title IV or Professional Judgement consideration.

Students who withdrawn for the program before the disbursements are made are no longer eligible to receive funds from this program.

3. The first disbursement amount will be paid five business days, after the student has filled out and turned in a short questionnaire on how the funds will be used and chosen methodology of payment to student.
4. The funds will be delivered via check which must be picked up on Campus while exercising Social distancing (by appointment only for those who may not yet be back on campus).