



MEMO

To: Chancellor Kristensen, VC Jon Watts, VC Charlie Bicak

From: Mary Sommers, director Financial Aid; Kelly Bartling, VC Enrollment Management and Marketing

Re: CARES Act student grant disbursement proposal/program

Updated/Final April 27, 2020

The U.S. Department of Education has issued additional guidance regarding eligible students for grants through the Higher Education Emergency Relief funds provided through the CARES Act. This guidance came on April 21. The limitations now in place have required us to revise our approach to allocating our refunds to UNK students.

The University of Nebraska at Kearney's total allocation is \$3,925,967. At least one-half of this allocation (\$1,962,984) must be awarded for emergency financial aid grants to students.

The most significant change resulting from ED guidance relates to student eligibility:

Not Title IV Aid, but Title IV Eligibility Required: While HEERF-student share dollars are not Title IV aid, ED's April 21 guidance states that students must meet Title IV eligibility requirements to receive HEERF emergency grants.

The only practical and efficient way to identify students who are Title IV aid eligible is through the completion of the FAFSA.

The other significant change resulting from ED guidance relates to delivery method of the program (not classes) in which the student is enrolled:

Online Students: Students who were enrolled exclusively in online programs on March 13 (the date of President Trump's national emergency proclamation) are not eligible for HEERF-student share funds.

We have pulled FAFSA filer data from PeopleSoft using the following parameters:

1. FAFSA filers enrolled as of March 13, 2020. Enrollment means one or more credit hours.
2. We have excluded all students enrolled in on-line graduate and undergraduate programs.
3. We excluded students who are in a non-degree status.

The eligible student number after applying these restrictions is 2,867 students.

We recommend the following approach to disburse this aid:

Phase I Awards: (beginning immediately upon receipt of grant funds)

Develop a questionnaire in Qualtrics for students to identify their expenses. We believe we have the capability to extract the data from the Qualtrics and turn it into an Excel spreadsheet and then using PeopleSoft's external award functionality, import the allocation of funds to the student and disburse

for processing through the Finance Office. This would require programming time from Associate Director Renee Besse. But we believe this would be relatively simple once the program was written. We would contact the 2,867 via email and drive them to the form. The form would ask the following: You have been impacted financially by the disruption of campus operations as a result of COVID 19. In which areas?

- a. Check(mark) which area costs were incurred:
 - i. travel/transportation,
 - ii. equipment/technology support,
 - iii. educational materials,
 - iv. housing/moving,
 - v. food,
 - vi. childcare,
 - vii. health care,
 - viii. "other"
- b. A simple award strategy of \$250 per "block" (expense "area") could be implemented. So if a student marks multiple boxes, the larger the award. If a student marks just one box, the smaller the award. Awards would then range from \$250 to \$2,000.

Phase II Awards:

After disbursing as much as possible through this initial process to the 2,867 FAFSA filers, we would implement a broader strategy to encourage non-filers to complete the FAFSA to establish eligibility for Title IV aid. Then proceed with the student completing the questionnaire to determine the impact of campus disruption and provide grant aid accordingly.

The advantage of this option is we clearly establish Title IV eligibility. The disadvantage is if the student completes the 2019-2020 year FAFSA, we will have to award the student their Title IV aid eligibility retroactively. The rules surrounding a retroactive award after the end of the semester are a little tricky and would require staff to evaluate and manually award while also establish a HEERF grant award. The solution to this would be to have the student complete the 2020-2021 FAFSA as we do not believe (at this time) it matters what FAFSA is completed for the purposes of establishing Title IV aid eligibility.

Again, things could change

At this time there are inquiries being made with the Department to determine if it would be allowable for the institutions to create a form that asks the student to self-certify that they meet the Title IV eligibility requirements. The student's signature would be enough certification – no FAFSA required. Our recommendation is being made in absence of guidance related to this self-certification. The bottom line is we want to release these funds to students as quickly as possible in order to spend the allocation in full.