



## **Higher Education Emergency Relief Fund (HEERF) II – Coronavirus Response and Relief Supplemental Appropriations Act (CRRSAA) 2021 - Processing, Awarding and Disbursement Policy**

### **Purpose:**

Career College of Northern Nevada (CCNN) has been allocated \$457,588.00 in grant funding by the U.S. Department of Education (U.S.D.O.E.) via the Higher Education Emergency Relief Fund (HEERF) II – Coronavirus Response and Relief Supplemental Appropriations Acts (CRRSAA) funding program. The U.S.D.O.E. has stated that the amount of funds made available by this supplemental award under CFDA 84.425E represents the minimum amount that CCNN must use for financial aid grants to students. As such, CCNN may not charge any indirect or administrative costs to funds made available under this grant.

The grant funding may be used for any component of the student's cost of attendance or for emergency costs that arise due to coronavirus, such as tuition, food, housing, healthcare (including mental healthcare) and childcare. This policy states the methods CCNN will use to calculate a student's eligibility for the funding in general, calculate each student's individual award amount and the process in which the funding will be disbursed to eligible students.

### **Submission:**

The Emergency Grant Applications will be emailed to all applicable student's, via their college assigned student email address, with detailed instructions on how to submit the application to the [e-student-grants@ccnn.edu](mailto:e-student-grants@ccnn.edu) email address for processing. This email address was created solely for the purpose of storing and organizing the submitted applications and only authorized personnel have access to said account. Subsequently, text messages will be sent to the student's personal contact number, listed in DiamondSIS, urging them to view and complete the application. For students who are no longer enrolled and/or their CCNN assigned student emails are no longer active, text messages will be sent to the contact number on file. They will be given the opportunity to provide us with a personal email address to have the application forwarded to.

The application is designed to allow for an electronic signature and contains a "Submit" link/button to have the application sent to the designated email address mentioned above. The student will provide a current address and contact information on the application to minimize errors when mailing out the individual disbursements.

**Qualifying:**

The U.S.D.O.E. has confirmed that the Interim Final Rule (IFR) (85 FR 36494 – Document Number 2020-12965) and its implementing regulation, 34 CFR 668.2, does not apply to the funding provided under the HEERF II program. As such a student does not have to be participating or eligible to participate in the U.S.D.O.E Title IV Federal Student Aid programs to be eligible to receive the grant funds. However, the Certification and Agreement for HEERF II states the school is obligated to comply with all other regulations and provisions already implemented.

CCNN will make the application available to all students who were enrolled in any period since March 13, 2020. Students who were actively enrolled and subsequently withdrew from a program, on or after March 13, 2020, will be reviewed on a case-by-case basis to determine need. CCNN will prioritize students with exceptional need. Need will be based on several factors, including but not limited to, Expected Family Contribution (EFC) calculation, disruption or changes to employment, emergency costs incurred, etc.

**Approval:**

CCNN has formed a committee for the purposes of qualifying, approving and administering the emergency grant funding. The CCNN CARES Act Emergency Grant Funding Committee consists of Mr. Nate Clark, President/C.E.O.; Mrs. Pamala Cisneros, Vice President/Business Office Manager and Mr. Eric Cadenhead, Financial Aid Director.

The committee will process all in-bound applications to determine an applicant's level of need. The applications will be compared against student records for the relevant enrollment information (i.e. date of enrollment, date of withdrawal, etc.) and the requested/provided documentation (if any). Upon approval from the committee the reviewed application is then forwarded to business office.

CCNN will, in no way, require a student's commitment to continued or future enrollment as a requirement for qualifying for the grant funding.

## **Disbursement:**

In compliance with section 314( c )(3), which requires the receiving institution to prioritize grants to students with exceptional need, CCNN has established funding brackets based on a student's level of need. A student can be assigned to a bracket based solely on the EFC provided on the current Institutional Student Information Record (ISIR) or based on the committee's evaluation of a student's specific circumstances\*\*. Each bracket corresponds to a flat funding award that all students who fall under that bracket will receive. CCNN acknowledges that the U.S.D.O.E. recommends the maximum Federal Pell Grant award as an appropriate maximum amount a student would receive for the grant. The award amounts listed for each bracket are calculated based on student populations for the award period.

## **Funding Brackets**

### **Independent Student(s):**

EFC of 0 – 2999	\$2,000.00
EFC of 3000 - 5712	\$1,700.00
EFC of 5713+	\$1,400.00

### **Dependent Student(s):**

EFC of 0 - 2999	\$1,600.00
EFC of 3000 – 5712	\$1,300.00
EFC of 5712+	\$1,000.00

\*\* Due to the IFR ( not applying to the HEERF II funding **at this time**, CCNN will be accepting and processing applications for students who are/were not eligible for the use of Title IV funding. **As there is no ISIR to reference for these students, CCNN has elected to use an EFC calculator provided by finaid.org. The EFC calculator will allow the FAD to input the student's (and parent) financial information for the appropriate tax year and generate an estimated EFC. As with student's who were able to complete a FAFSA, the estimated EFC will determine the funding bracket the student will be awarded under.**

CCNN, in accordance with 2 CFR 200.305, will limit the time between drawing down funds in G5 and paying incurred obligations, to no more than 15 calendar days. CCNN acknowledges that any time frame in excess of 15 calendar days may result in heightened scrutiny by the U.S.D.O.E., auditors and/or the Office of the Inspector General (OIG). CCNN also acknowledges that returns made based on the college drawing down excessive grant funds in advance of need may result in higher scrutiny by the U.S.D.O.E. Additionally, CCNN acknowledges that it must maintain all funds that have been drawn down in an interest-bearing account and any interest earned on any/all federal grants in an institution's fiscal year, in excess of \$500.00, must be returned to the federal government.

In an effort to disburse as much funding as possible over the shortest period of time, CCNN will be disbursing the funding as close to the quarterly maximums as possible.

**Thresholds for excessive draws of funds:**

**First Quarter:** More than 50% of the funds for the budget period have been drawn by the end of this quarter. (Not to exceed 50% of funds by the end of quarter).

**Second Quarter:** More than 80% of the funds for the budget period have been drawn by the end of this quarter. (Not to exceed 80% of funds by the end of quarter).

**Third Quarter:** 100% of the funds for the budget period have been drawn by the end of this quarter. (Not to exceed 99% of funds by the end of quarter).

CCNN acknowledges that it will promptly and to the greatest extent practicable disburse all grant funds to students within the one-year period of performance, specified in box 6 of the Grant Award Notification (GAN). Moreover, CCNN is aware that it must draw down an amount of the grant funds within 90 days of the date the supplemental award. CCNN understands that in the event that the institution fails to draw down funds within the 90 day period, the U.S.D.O.E. may take action, up to and including terminating the grant award.

Funding will be awarded based on the order the applications have been received/processed and up to the quarterly funding thresholds. Once the quarterly threshold is met, subsequent approved applications will be scheduled for the following quarter.

In the event that a student has pressing needs that are not conducive to waiting to the next scheduled award period, CCNN reserves the ability to make an advanced payment to the student, out of a future disbursement period, which will be reimbursed from the scheduled funds intended for that student in that award period. Students who submit evidence of extraordinary expenses who are approved for advance funding who later withdraw may be required to repay any advanced payments made under this criterion.

An award letter will be provided to each student upon receipt of their disbursement. The award letter will include the dollar amount awarded and requires the student to sign and date the form as confirmation of receipt of the funds. The award letter will also include an indicator, allowing the student to elect to have CCNN apply the funding to their college account to cover educationally related expenses. The student is not required to apply any portion of the funding to their college account. Any such refusal will not impact the student's receipt of the funding.

## **Reporting**

At this time not all reporting requirements have not been made clear and CCNN will closely follow any additional news, updates and/or changes in standards or requirements. Currently, the U.S.D.O.E. is requiring that the institution report on the use of the supplemental funds no later than 6 months from the date of the award. The institution must also provide a detailed accounting of the use of funds in such a manner and frequency as the U.S.D.O.E. requires (to be determined).

The business office will keep track of all funds that have been approved/disbursed in an effort to maintain the data that may be necessary for future reporting requirements.

As per guidance from the U.S.D.O.E., CCNN's financial aid director will not consider the funding awarded under this grant as a metric for calculating a student's expected family contribution or be counted towards a student's remaining need calculation.

If CCNN's Authorized Representative changes or the institution terminates operations/closes or merges with another institution or organization, CCNN will notify, in writing, the assigned program office contact listed in box 3 of the GAN.

CCNN must cooperate with any examination of records with respect to the advanced funds by making records and authorized individuals available when requested, whether by (i) the Department and/or its OIG; or (ii) any other Federal agency, commission, or department in the lawful exercise of its jurisdiction and authority. CCNN must retain all financial records, supporting documents, statistical records, and all other non-Federal entity records pertinent to a Federal award for a period of three years from the date of submission of the final expenditure report pursuant to 2 CFR § 200.334.

CCNN acknowledges that failure to comply with this Supplemental Agreement, its terms and conditions, and/or all relevant provisions and requirements of the CRRSAA or any other applicable law may result in the institution's liability under the False Claims Act, 31 USC § 3729, et seq.; OMB Guidelines to Agencies on Governmentwide Debarment and Suspension (Nonprocurement) in 2 CFR part 180, as adopted and amended as regulations of the Department in 2 CFR part 3485; 18 USC § 1001, as appropriate; and all of the laws and regulations referenced in the "Applicable Law" section of this Certification and Agreement, below.

## **Applicable Law**

The institution must comply with all applicable assurances in OMB Standard Forms (SF) SF-424B and SF-424D (Assurances for Non-Construction and Assurances for Construction Programs), including the assurances relating to the legal authority to apply for assistance; access to records; conflict of

interest; nondiscrimination; Hatch Act provisions; labor standards; Single Audit Act; and the general agreement to comply with all applicable Federal laws, executive orders, and regulations.

The institution certifies that with respect to the certification regarding lobbying in Department Form 80-0013, no Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the making or supplementing of Federal grants under this program; Recipient must complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," when required (34 CFR part 82, Appendix B).

The institution must comply with the provisions of all applicable acts, regulations and assurances; the following provisions of Education Department General Administrative Regulations (EDGAR) 34 CFR parts 75, 77, 81, 82, 84, 86, 97, 98, and 99; the OMB Guidelines to Agencies on Governmentwide Debarment and Suspension (Nonprocurement) in 2 CFR part 180, as adopted and amended as regulations of the Department in 2 CFR part 3485; and the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards in 2 CFR part 200, as adopted and amended as regulations of the Department in 2 CFR part 3474.