

## **Higher Education Emergency Relief Fund Reporting- Emergency Financial Aid Grants to Students**

Section 18004(e) of the Coronavirus Aid, Relief, and Economic Security Act (“CARES Act” or the “Act”), Pub. L. No. 116-136, 134 Stat. 281 (March 27, 2020), directs institutions receiving funds under Section 18004 of the Act to submit (in a time and manner required by the Secretary) a report to the Secretary describing the use of funds distributed from the Higher Education Emergency Relief Fund (“HEERF”). Section 18004(c) of the CARES Act requires institutions to use no less than 50 percent of the funds received from Section 18004(a)(1) of the CARES Act to provide Emergency Financial Aid Grants to students 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). On April 9, 2020, the Department published documents related to the Emergency Financial Aid Grants, including a letter from Secretary Betsy DeVos, a form Certification and Agreement for signing and returning by institutions to access the funds, and a list of institutional allocations under 18004(a)(1).

The Certification and Agreements for the CRRSAA and ARP (a)(1) and (a)(4) funds provide that each institution applying for HEERF funds must promptly and timely provide a detailed accounting of the use and expenditure of the funds in such manner and with such frequency as the Secretary may require. Each HEERF participating institution must post the information listed below on the institution's primary website, as an initial report under the CRRSAA and ARP (a)(1) and (a)(4) programs. This report is associated with the approved information collection under OMB control number 1801-0005.

The Department encourages institutions to report as soon as possible, but no later than 30 days after the publication of this notice or 30 days after the date the Department first obligated funds under HEERF I, II, or III to the institution for Emergency Financial Aid Grants to Students, whichever comes later.

The following information must appear in a format and location that is easily accessible to the public. This information must also be updated no later

than 10 days after the end of each calendar quarter (September 30, and December 31, March 31, June 30) thereafter, unless the Secretary specifies an alternative method of reporting:

- (1) An acknowledgement that the institution signed and returned to the Department the Certification and Agreement and the assurance that the institution has used the applicable amount of funds designated under the CRRSAA and ARP (a)(1) and (a)(4) programs to provide Emergency Financial Aid Grants to Students.

**The Edward Via College of Osteopathic Medicine (VCOM) signed and returned the Recipient's Funding Certification and Agreement to the Department of Education on April 13, 2020 in application of emergency funds for students. VCOM subsequently signed and returned a second certification and agreement in application of funds for Recipient's Institutional Costs on April 27<sup>th</sup>, 2020. The college has used fifty percent of all funds received under Section 18004(a)(1) of the CARES Act to provide emergency financial aid grants to our students, prior to the deadline to disburse funds within 1-year of the certification and agreement submission.**

- (2) The total amount of funds that the institution will receive or has received from the Department pursuant to the institution's Certification and Agreement for Emergency Financial Aid Grants to Students under the CRRSAA and ARP (a)(1) and (a)(4) programs.

**VCOM received its "advanced funds" distribution of \$294,902 on Friday, April 24<sup>th</sup>, 2020. These funds represent the Department of Education's allocation to the College of emergency financial aid grants to students under the Coronavirus Aid, Relief, and Economic Security (CARES) Act HEERF 1.**

**VCOM received its "advanced funds" distribution of \$294,902 on Friday, April 16<sup>th</sup>, 2021. These funds represent the**

**Department of Education's allocation to the College of emergency financial aid grants to students under the Coronavirus Response and Relief Supplemental Appropriations ACT (CRRSAA) HEERF II.**

**VCOM received its "advanced funds" distribution of \$692,433 on Friday, June 11<sup>th</sup>, 2021. These funds represent the Department of Education's allocation to the College of emergency financial aid grants to students under the American Rescue Plan (ARP) HEERF III.**

- (3)** The total amount of Emergency Financial Aid Grants distributed to students under the CRRSAA and ARP (a)(1) and (a)(4) programs as of the date of submission (i.e., as of the initial report and every calendar quarter thereafter).

**As of June 30<sup>th</sup>, 2021, VCOM has distributed \$1,327,402 in Emergency Financial Aid Grants directly to students under Section 18004(a)(1) of the CARES Act, CRRSAA and ARP (HEERF I, II, & III).**

- (4)** The estimated total number of students at the institution that are eligible to receive Emergency Financial Aid Grants to Students under the CRRSAA and ARP (a)(1) and (a)(4) programs.

**Originally, VCOM had an estimated 1,900 or 95% of its students that were eligible to participate in programs under Section 484 in Title IV of the Higher Education Act of 1965 and are therefore eligible to receive Emergency Financial Aid Grants under Section 18004(a)(i) of the CARES Act.**

**After subsequent guidance was released removing the title IV eligibility requirement, 100% (2,572) of VCOM's enrolled students were deemed eligible to receive Emergency Financial Aid Grants under Section 18004(a)(i) of the CARES Act, CRRSAA and ARP (HEERF I, II, & III).**

- (5) The total number of students who have received an Emergency Financial Aid Grant to students under the CRRSAA and ARP (a)(1) and (a)(4) programs.

**VCOM has disbursed Emergency Financial Aid Grants to 2,572 students under Section 18004(a)(1) of the CARES Act, CRRSAA and ARP (HEERF I, II, & III).**

- (6) The method(s) used by the institution to determine which students receive Emergency Financial Aid Grants and how much they would receive under the CRRSAA and ARP (a)(1) and (a)(4) programs.

**VCOM first provided fund disbursements in equal amounts of \$300 to 4<sup>th</sup> year graduating students indiscriminately across our three campuses - Virginia, Carolinas and Auburn. It was recognized by college leadership that many 4<sup>th</sup> year students were having to relocate earlier than planned, following completion of academic work, to their residency sites to meet advance self-quarantine compliance. These students collectively experienced the greatest need and cost related to the disruption caused by coronavirus, most commonly from unforeseen travel expenses associated with the earlier than expected assignments. Students yet to experience unanticipated costs were advised to use these grants towards rising general relocation expenses or a variety of out of pocket expenses unique to graduating students.**

**Secondary disbursements in equal amounts of \$300 were also provided to 2<sup>nd</sup> year students indiscriminately across our three campuses – Virginia, Carolinas and Auburn. As a direct result of coronavirus disruption and mandated distancing, it was necessary for VCOM 2<sup>nd</sup> year students to participate in an on-line Comprehensive Review Course for Block 8. The Comprehensive Review Course is the primary way VCOM prepares students for COMLEX Level 1. To supplement the on-line course and assure each student had an optimum opportunity to succeed on boards as a result of**

the course, it was necessary for each 2<sup>nd</sup> year student to purchase a U World subscription, an unanticipated expense for them. This subscription purchase enhanced the on-line curriculum VCOM was required to move to (rather than the in-class program traditionally provided) when COVID19 requirements for social distancing were enforced. Recognizing the needed but supplemental cost incurred by students, VCOM elected to provide a \$300 stipend to each 2<sup>nd</sup> year to defray the unexpected subscription cost.

Additionally, VCOM provided a third round of fund disbursements in equal amounts of \$100 to all Rising 4<sup>th</sup> year medical students indiscriminately across our three campuses - Virginia, Carolinas and Auburn. VCOM did not make a specific requirement as to the use of these funds; however, we did acknowledge that students might incur some additional expense related to obtaining the appropriate PPE required for their clinical rotation experience, beyond what VCOM has provided. These mandates for supplemental protection are a direct result of COVID19 risks.

In April 2021, VCOM awarded all 2,065 enrolled students an additional \$500 grant stipend to help defray some of the emergency costs that arose in direct correlation to the Coronavirus pandemic. As a graduate medical school, VCOM students are not eligible for Pell Grants and Expected Family Contribution (EFC) does not impact how much federal financial aid they are eligible to receive; however, every VCOM student was adversely impacted financially as a result of the COVID pandemic. Student leaders communicated with administration a wide variety of out-of-pocket emergency expenses related to the pandemic. These expenses included, but were not limited to, costs of additional housing, travel, purchase of additional supplemental and specialized personal protective equipment, increased data usage due to distance learning, I.T. accessories, increased childcare fees, COVID testing and COVID treatment, additional study resources, heightened cost of normal groceries and routine take-out meals, etc. Based upon student feedback provided

during regular scheduled virtual meetings, it was evident that all students had shown additional financial need due to the Coronavirus pandemic. Therefore, VCOM determined the best way to help the most students in the most expediate manner was to give equal \$500 stipends to every currently enrolled student, totaling an amount of \$1,032,500.00 aid provided to students. This exceeded the \$987,335 total of student funds provided by HEERF II & HEERF III by \$45,165.

- (7) Any instructions, directions, or guidance provided by the institution to students concerning the Emergency Financial Aid Grants.

VCOM 4<sup>th</sup> year (class of 2020), 2<sup>nd</sup> year (class of 2022), and rising 4<sup>th</sup> (class of 2021) year students were notified that they would be receiving these emergency financial aid grants prior to June 30<sup>th</sup>, 2020 and that the grants would not need to be paid back. Students were strongly encouraged to use these funds directly to help offset the unexpected supplemental costs each incurred during spring 2020 related to coronavirus disruption.

VCOM 1st year (class of 2024), 2<sup>nd</sup> year (class of 2023), 3<sup>rd</sup> year (class of 2022), 4<sup>th</sup> year (class of 2024) year students were notified that they would be receiving these emergency financial aid grants in April, 2021 and that the grants would not need to be paid back. Students were notified that these funds were to help cover emergency costs that arose due to coronavirus. Receipt of the grants was not contingent on continued enrollment, any obligation to use for any outstanding balances owed or use for any specified need other than to defray emergency costs incurred.

