

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 Agreement directs each institution applying for HEERF funds to comply with Section 18004(e) of the CARES Act and submit an initial report (the “30-day Fund Report”) to the Secretary thirty (30) days from the date of the institution’s Certification and Agreement to the Department. The Department will provide instructions for providing the required information to the Secretary in the near future. In the meantime, each HEERF participating institution must post the information listed below on the institution’s primary website. The Department would like to receive the most current information from the date when the institution received its allocation for emergency financial aid grants to students, and the institution should have received its allocation within a few days after submitting the Certification and Agreement. Accordingly, the following information must appear in a format and location that is easily accessible to the public 30 days after the date when the institution received its allocation under 18004(a)(1) and updated every 45 days thereafter:

1. An acknowledgement that the institution signed and returned to the Department the Certification and Agreement and the assurance that the institution has used, or intends to use, no less than 50 percent of the funds received under Section 18004(a)(1) of the CARES Act 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 27th, 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.

VCOM received its "advanced funds" distribution of \$294,902 on Friday, April 24th, 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.

3. The total amount of Emergency Financial Aid Grants distributed to students under Section 18004(a)(1) of the CARES Act as of the date of submission (i.e., as of the 30-day Report and every 45 days thereafter).

As of June 30th, 2020, VCOM has distributed \$294,902 in Emergency Financial Aid Grants directly to students under Section 18004(a)(1) of the CARES Act.

4. The estimated total number of students at the institution eligible to participate in programs under Section 484 in Title IV of the Higher Education Act of 1965 and thus eligible to receive Emergency Financial Aid Grants to students under Section 18004(a)(1) of the CARES Act.

VCOM has an estimated 1,900 or 95% of its students that are 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.

5. The total number of students who have received an Emergency Financial Aid Grant to students under Section 18004(a)(1) of the CARES Act.

VCOM has disbursed Emergency Financial Aid Grants to 1,251 students under Section 18004(a)(1) of the CARES Act.

6. The method(s) used by the institution to determine which students receive Emergency Financial Aid Grants and how much they would receive under Section 18004(a)(1) of the CARES Act.

VCOM first provided fund disbursements in equal amounts of \$300 to 4th year graduating students indiscriminately across our three campuses - Virginia, Carolinas and Auburn. It was recognized by college leadership that many 4th 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 2nd 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 2nd 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 2nd 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 2nd year to defray the unexpected subscription cost.

Additionally, VCOM provided a third round of fund disbursements in equal amounts of \$100 to all Rising 4th 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.

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

VCOM 4th year, 2nd year, and rising 4th year students were notified that they would be receiving these emergency financial aid grants prior to June 30th, 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.

***Note:** In preparing the 30-day Fund Report, institutions should use data suppression and other methodologies to comply with, and protect the personally identifiable information from student education records, under the Family Educational Rights and Privacy Act (20 U.S.C. § 1232g; 34 CFR Part 99). For example, the Department does not expect institutions to report information about a group of 10 or fewer students. For example, if the total number of eligible students, the total of number of students who received Emergency Financial Aid Grants, or the difference between the two numbers is less than 10, then the institution should not display the number of students or the amount of Emergency Financial Aid Grants to students on publicly available website(s) controlled by the institution.

Institutions that accurately report the information listed above will meet the initial reporting requirements. For subsequent reports and reporting for other related HEERF programs, the Department will notify participating institutions of the Department's preferred reporting method. The Department may choose to collect additional information from institutions in accordance with the reporting requirement stated at Section 18(e) of the CARES Act and the Certification and Agreement.