



## Higher Education Emergency Relief Fund (HEERF) POLICY

Effective 4/20/2020

The CARES Act has provided Oxford Academy of Hair Design with emergency financial aid grants for 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)

Oxford Academy of Hair Design signed and returned the HEERF Certification and Agreement on April 28, 2020. The Amount of the Student Emergency Financial Aid Grants was \$106,470.00. The funds were received into the Federal Funds account on May 7, 2020. The school distributed 100% of these funds to eligible students upon receipt through mailed checks and Direct Deposit. There were 90 eligible students and each student received \$1183.00.

**Student Eligibility:** *If a student is eligible to participate in the Title IV federal student aid programs and meets all applicable general student eligibility criteria in Section 484 of the HEA then they would be eligible for the HEERF Grant, however without having a FAFSA on file, the school would need to verify that a student meets all of the Title IV eligibility criteria.* All enrolled students at Oxford Academy of Hair Design had a FAFSA on file, making each student eligible.

The school's policy is to equally disburse these funds to eligible students.

- a. The funds must be used by the student to cover expenses related to the disruption of campus operations due to COVID-19. This includes eligible expenses covered under COA such as Room and Board, Personal and Transportation expenses.
- b. Oxford Academy of Hair Design will spend these funds in full within 1 year of receipt of the funds.
- c. The funds will be set up in separate fund bank account and allocated out of this account to students on a separate ledger.
- d. Students will complete a secure form accepting these funds and choosing the allocation method of direct deposit or check format.
- e. Oxford Academy of Hair Design will track the distribution of these funds for reporting to ED within 30 days of receipt.

Oxford Academy of Hair Design will use no less than fifty percent of the funds received 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).

This Certification and Agreement solely concerns the emergency financial aid grants to students under Section 18004(c) of the CARES Act. To address the pressing financial need of students due to the disruption of campus operations from coronavirus, and pursuant to the authority duly delegated to the

Secretary under the CARES Act and associated with the coronavirus emergency, as stated in Proclamation 9994 of March 13, 2020, "Declaring a National Emergency Concerning the Novel Coronavirus Disease (COVID-19) Outbreak," Federal Register Vol. 85, No. 53 at 15337-38, the Secretary and Recipient agree as follows: 1. The Secretary will provide Recipient fifty (50) percent of its formula grant funds (the "advanced funds") for the sole and exclusive purpose of providing emergency financial aid grants to students for their expenses related to the disruption of campus operations due to coronavirus, such as food, housing, course materials, technology, health care, and child-care expenses. 2. Recipient agrees to promptly make available emergency financial aid grants from the advanced funds directly to students for their expenses related to the disruption of campus operations due to coronavirus, such as food, housing, course materials, technology, health care, and child-care expenses. Recipient shall not use the advanced funds to reimburse itself for any costs or expenses, including but not limited to any costs associated with significant changes to the delivery of instruction due to the coronavirus and/or any refunds or other benefits that Recipient previously issued to students. 3. Recipient retains discretion to determine the amount of each individual emergency financial aid grant consistent with all applicable laws including non-discrimination laws. Recipient acknowledges that the Secretary recommends the maximum Federal Pell Grant for the applicable award year as an appropriate maximum amount for a student's emergency financial aid grant in most cases, and the Recipient should be mindful of each student's particular socioeconomic circumstances in the staging and administration of these grants. The Secretary strongly encourages Recipient's financial aid administrator to exercise the use of professional judgment available under Section 479A of the Higher Education Act of 1965 (HEA), 20 U.S.C § 1087tt, to make adjustments on a case-by-case basis to exclude individual emergency financial aid grants from the calculation of a student's expected family contribution. The Secretary does not consider these individual emergency financial aid grants to constitute Federal financial aid under Title IV of the HEA. 1 4. In consideration for the advanced funds and as conditions for their receipt, Recipient warrants, acknowledges, and agrees that: (a) The advanced funds shall not be used for any purpose other than the direct payment of grants to students for their expenses related to the disruption of campus operations due to coronavirus, such as food, housing, course materials, technology, health care, and child-care; (b) Recipient holds those funds in trust for students and acts in the nature of a fiduciary with respect thereto; (c) Recipient shall promptly comply with Section 18004(e) of the CARES Act and (i) report to the Secretary thirty (30) days from the date of this Certification and Agreement and every fortyfive (45) days thereafter in accordance with 2 CFR 200.333 through 2 CFR 200.337, or in such other additional form as the Secretary may specify, how grants were distributed to students, the amount of each grant awarded to each student, how the amount of each grant was calculated, and any instructions or directions given to students about the grants; and (ii) document that Recipient has continued to pay all of its employees and contractors during the period of any disruptions or closures to the greatest extent practicable, explaining in detail all specific actions and decisions related thereto, in compliance with Section 18006 of the CARES Act; (d) Recipient shall comply with all requirements in Attachment A to this Certification and Agreement; (e) Recipient shall promptly and to the greatest extent practicable distribute all the advanced funds in the form of emergency financial aid grants to students by one year from the date of this Certification and Agreement, and document its efforts to do so as part of the report specified in subsection (c) above;