

**Aveda Institute Columbus**  
**Higher Education Emergency Relief Fund Reporting**  
**Emergency Financial Aid Grants to Students**

Date of Last Update: July 15, 2020

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 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. Accordingly, the following information is being provided to comply with the “30-day Fund Report” and will be periodically updated at minimum, every 45 days thereafter:

1. Aveda Institute Columbus acknowledges that it has signed and returned to the Department the Certification and Agreement and provides assurance that it intends to use no less than 50 percent of the funds received under Section 18004(a)(1) of the CARES Act to provider Emergency Financial Aid Grants to students.
2. The total amount of funds that the institution has received from the Department pursuant to the institution’s Certification and Agreement for Emergency Financial Aid Grants to Students is \$299,813.00.
3. The total amount of Emergency Financial Aid Grants distributed to students under Section 18004(a)(1) of the CARES act as of July 15, 2020 is \$194,898.24.
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 is 252.

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 as of July 15, 2020 is 163.
6. The method 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 is as follows:

### **Distribution of Student Grants under the Higher Education Emergency Relief Fund Policy and Procedures**

#### **Preamble**

The Coronavirus Aid, Relief, and Economic Security (CARES) Act provides emergency assistance and health care response for individuals, families, and businesses affected by the 2020 coronavirus pandemic (“COVID-19”). The CARES Act includes the provision of approximately \$12.56 billion for the Higher Education Emergency Relief Fund (HEERF). Institutions of higher education are to receive an allocated share of this fund under a formula based on student enrollment described in the Act and to be administered by the Secretary of the U.S. Department of Education. The CARES Act requires, in part, that “Institutions of higher education shall use no less than 50 percent of such funds 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).”

As announced by the Secretary, the Aveda Institute Columbus (the “Institute”) is to receive \$299,813.00 (the “Grant Fund”) for the purposes of making emergency financial aid grants to its students. This document sets forth the Institute’s plan for allocating, disbursing, and accounting for the Grant Fund.

Just as COVID-19 does not discriminate on the basis of socioeconomic status, the Institute recognizes that a wide array of individuals and industries have been adversely impacted by COVID-19. The Institute recognizes that our students’ lives have been severely disrupted by coronavirus. Many are facing financial challenges and struggling to make ends meet. In order to provide financial relief to as many students as possible, the Institute will distribute emergency financial aid grants from the Grant Fund to all eligible students who were actively enrolled as of April 6, 2020. Each eligible student will receive a minimum grant allocation. In recognition that some of our students face greater financial need, additional grant funds will be allocated to those students who borrowed federal student loans to finance their educational costs and for those students who received federal Pell grants. The allocation methodology and terms for receipt of the emergency financial aid grants are more fully described below.

## **Allocation of Grant Funds Formula**

The U.S. Department of Education has made HEERF grants available to students of the Institute who need financial support for their expenses related to the disruption of campus operations due to the Coronavirus pandemic (including course materials, technology, food, housing, healthcare and childcare). These funds will be allocated and distributed to students based on reference to the U.S. Department of Education's calculation of the student's need and Title IV eligibility as follows:

<b>Title IV Student Need Basis:</b>	<b>Number of Grant Fund Shares Received</b>
Students who received Pell Grants in 2019-20 Award Year	4 shares
Students who did not receive Pell Grants but received Federal Student Loans in 2019-20 Award Year	2 shares
Students who are Title IV eligible but received neither Pell Grants nor Federal Student Loans in 2019-20 Award Year	1 share

The total number of Grant Fund shares will be calculated as the sum of:

- The number of students who received Pell Grants in 2019-20 Award Year multiplied by 4; plus
- The number of students who did not receive Pell Grants but received Federal Student Loans in 2019-20 Award Year multiplied by 2; plus
- The number of students who are Title IV eligible but received neither Pell Grants nor Federal Student Loans in 2019-20 Award Year multiplied by 1.

The value of one Grant Fund share will be calculated by dividing (i) the amount of the Grant Fund by (ii) the total number of Grant Fund shares.

In accordance with guidance published by the U.S. Department of Education, student grants will be distributed only to students who are Title IV eligible. An eligible enrolled student includes any student who has not been withdrawn, to include students progressing via temporary distance education. Students who are on an approved Leave of Absence due to issues related to COVID-19 that began on or after March 13, 2020 are considered actively enrolled and are eligible to receive their share(s) of the Grant Fund. The currently attending student roster will be determined by taking a census of the student body as of April 6, 2020. Any student withdrawn from the Institute prior to May 29, 2020 is not an eligible student and will not receive a grant award under this plan.

Students who have filed a Free Application for Federal Student Aid (FAFSA) and for which the Institute has a current Institutional Student Information Record (ISIR) demonstrating Title IV eligibility will be considered Title IV eligible for purposes of the grants to be disbursed under this plan. Students enrolled as of April 6, 2020 who did not previously file a FAFSA but are U.S. citizens, or eligible non-citizens, may certify to the Institute that they are eligible to participate in the Title IV Federal Student Aid programs and therefore eligible to receive an emergency financial aid grant.

This plan applies to students who are enrolled at Aveda Institute Columbus, which includes Aveda Institute Los Angeles as its additional location.

### **Awarding Procedures**

The Institute will prepare a roster of eligible currently enrolled students as of April 6, 2020 and determine the grant amount for each eligible student based on the formula described above.

The Institute Support Center will oversee the awarding and currently enrolled student census. The Institute will deposit the Grant Fund in a separate dedicated checking account with Civista Bank to be used for the sole purpose of administering the emergency student financial aid grants in accordance with Federal law, published guidance from the U.S. Department of Education, and this plan.

### **Disbursement Procedures**

The Institute will begin contacting students about the emergency financial aid grants on or about May 29, 2020. The Institute will make every reasonable effort to contact all eligible students to notify them of the emergency financial aid grant to which they are entitled. Included with this notice will be an attestation statement (Exhibit A) to be signed by the student wherein the student shall acknowledge financial need and that the emergency grant funds will be used to cover expenses related to the disruption of campus operations due to coronavirus, such as food, housing, course materials, technology, health care, and child-care. This notice and acknowledgment statement will be sent to the student's email address on record with the Institute. Students will complete the acknowledgment statement via DocuSign or return a signed copy of the statement to the Institute.

No student emergency financial aid grants will be disbursed to any otherwise eligible student who fails to or refuses to sign the acknowledgment statement.

Student grant awards will be paid securely by the Institute's banking partner, Civista Bank. Students will indicate on their acknowledgement statements whether they would like to receive their grant funds by Bill Pay or by check. If a student chooses to receive their grant funds via Bill Pay, then they will be contacted by Civista Bank with instructions for the secure delivery of their funds electronically to their bank account. For those students who choose to receive their grant funds via check, Civista Bank will send the check to the current address listed on the student's attestation statement. Whether the student grant funds are delivered via check or Bill Pay, students will receive a grant notification in the form attached to this Plan as Exhibit B.

## **Accounting & Recordkeeping**

The Institute Support Center will be responsible for the administration of the emergency financial aid grants.

The Institute Support Center is responsible for all accounting and recordkeeping associated with the administration of the student emergency financial aid grants. The Institute Support Center shall maintain an Excel spreadsheet to track all disbursements by student. The Institute Support Center shall also be responsible for completing all reports that must be submitted to the U.S. Department of Education as required by the CARES Act and any future guidance from the Department.

## **Grants of Unclaimed Funds**

It is the Institute's intention that the entire Grant Fund will be disbursed to all eligible students in the manner set forth above. However, the Institute recognizes that there may be some amounts allocated to students that do not ultimately get disbursed as intended. For example, the Institute may not be able to timely locate an eligible student on an approved leave of absence. It is possible that an eligible student may decline the grant funds or refuse to sign the attestation statement.

In the event that there is any amount remaining from the Grant Fund as of June 30, 2020, the Institute will disburse such remaining funds via additional emergency need-based grants. The Institute will send an email to all eligible students informing them of the availability of additional grants. The email will include an application form to be completed by students seeking to be considered for an additional emergency need-based grant.

A committee consisting of the Institute's President, Director, and the Director of Support Center Operations will decide which students shall receive an additional emergency need-based grant and the amount of such grant. The maximum amount of any additional emergency need-based grant shall not exceed \$1,000.00, and there is no minimum dollar amount. The committee will consider the information to be provided on the student's grant application as well as information already on record with the Institute such as the student's dependency status, family size, expected family contribution, unmet financial need, program length, satisfactory academic progress, and expected completion date.

7. The institution will provide the following instructions, directions or guidance to its students concerning the Emergency Financial Aid Grants:
  - a. Attestation Statement: Prior to distribution, each student will receive and be obligated to sign and return the following attestation statement:

**Student Grants under the Higher Education Emergency Relief Fund**  
**Attestation**

**Student Name:**  
**Current Mailing Address:**  
**Mobile Phone Number:**  
**Email Address:**  
**Amount of Award: \$**  
**Date Notified:**

*Please return this attestation statement to the Institute as soon as possible but no later than June 8, 2020. Failure to return this attestation statement by this date may result in your grant award being forfeited and those funds being used to make additional grants to other students.*

I accept the grant award provided to me from funding made available to the Aveda Institute Columbus under the CARES Act.

I certify the following:

- All information provided in this Attestation is true and correct to the best of my knowledge.
- I have incurred expenses and am experiencing financial need due to disruptions caused by the coronavirus pandemic.
- I am a United States citizen or eligible non-citizen and am eligible to participate in the Title IV Federal Student Aid programs.
- **I understand that any money awarded from this grant is to be used for expenses related to the disruption of campus operations due to coronavirus. These expenses include eligible expenses under a student's cost of attendance in the calculation of Federal Financial Aid, such as food, housing, course materials, technology, health care, and childcare. The money I am receiving is intended to cover my expenses related to the disruption of campus operations.**

Please deliver my grant award via the following method (choose one):

\_\_\_\_\_ Electronic Transfer via Bill Pay                      \_\_\_\_\_ Check by Mail  
*Grand award funds delivered by electronic transfer via Bill Pay are generally available sooner than funds mailed by check.*

I understand that if I choose to use Bill Pay that Civista Bank will email me the instructions to complete the transfer of my grant award to my bank account. I understand that if I choose to receive my grant award by manual check that it will be mailed to me to the address listed above. I will immediately notify the Institute if at any time my address changes. I further understand that if the Institute is unable to locate me and/or distribute any part of my grant award after making reasonable efforts that I will forfeit such funds and that the Institute may use those funds to make additional grants to other students.

\_\_\_\_\_  
Student Signature

\_\_\_\_\_  
Date

b. Notification Letter: Eligible students will receive the following notification letter with their receipt of emergency financial aid grant funds:

June \_\_\_\_, 2020

Student Name:

Current Mailing Address:

Re: CARES Act Student Emergency Relief Grant

Dear Student,

The Coronavirus Aid, Relief, and Economic Security (CARES) Act provides emergency assistance for students who are in need of financial support for expenses related to the disruption of campus operations due to the coronavirus pandemic. Under the CARES Act, the Aveda Institute Columbus has received grant funding from the U.S. Department of Education for the purpose of making emergency financial aid grants to its students.

You have been awarded an emergency financial aid grant in the amount of \$\_\_\_\_\_. This is a grant, which means that this amount does not need to be repaid. Your acceptance of these grant funds is conditioned upon your agreement to use the funds for the purposes allowed under the CARES Act and as agreed upon by you in the attestation statement that you previously provided to the Institute. In particular, you have attested that you have a need for this grant and that the money awarded from this grant is to be used for expenses related to the disruption of campus operations due to coronavirus. These expenses include eligible expenses under a student's cost of attendance in the calculation of Federal Financial Aid, such as food, housing, course materials, technology, health care, and childcare. The money you are receiving is intended to cover your expenses related to the disruption of campus operations.

We hope that you and your family and friends are safe and healthy. We are currently working on plans to allow you to return to our campus in a safe and responsible manner in accordance with federal, state and local directives. We will keep you informed as our plans are developed. In the meantime, please do not hesitate to contact us if you have any questions.

Very truly yours,

Patrick J. Thompson, President