



Date of Last Update: August 4, 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. Bennett Career Institute 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 provide 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 \$214,606.00.
3. The total amount of Emergency Financial Aid Grants distributed to students under Section 18004(a)(1) of the CARES act as of August 4, 2020 is \$68,000.00

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 85 students.

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 is 85 students.

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. The CARES Act includes the provision of approximately \$12.56 billion for the Higher Education Emergency Relief Fund. 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, Bennett Career Institute (BCI) is to receive \$214,606.00 (the “Grant Fund”) for the purposes of making emergency financial aid grants to its students. This document sets forth BCI’s plan for allocating, disbursing and accounting for the Grant Fund.

Just as COVID-19 does not discriminate on the basis of socioeconomic status, BCI recognizes that a wide array of individuals and industries have been adversely impacted by COVID-19. BCI 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, BCI will distribute \$800.00 emergency financial aid grants from the Grant Fund to all eligible students who were actively enrolled as of March 17, 2020. In recognition that some of our students face a greater financial need, additional need-based grant funds will be awarded to those students who demonstrate additional current financial need. The allocation methodology and terms for receipt of the emergency financial aid grants are more fully described below.

### **Allocation of Grant Funds**

Each eligible student will receive a grant award of \$800.00. 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 currently enrolled student includes any student that 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 17, 2020 are considered actively enrolled and are eligible to receive the grants. The eligible student roster will be determined by taking a census of the student body as of March 17, 2020.

Students that return to school and are considered ineligible and are affected by the coronavirus will be given an opportunity to come in to compliance by meeting the criteria listed above. Ineligible students that become compliant after returning to school will not be eligible for the initial \$800.00. The student will be awarded a one time grant amount which shall not exceed \$2,500.00. Students must complete an application form (Exhibit C) and submit it to the Financial Aid Director. The Committee will determine the dollar amount based on the criteria listed below.

BCI will disburse the remaining Grant Funds via additional emergency need-based grants. BCI will send an email to all eligible students informing them of the availability of additional grants. The email will include an application form (Exhibit C) to be completed by students seeking to be considered for an additional emergency need-based grant.

A committee consisting of BCI's CEO, Director, and Financial Aid Director 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 \$2,500.00, 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 BCI such as the student's dependency status, family size, expected family contribution, unmet financial need, program length, satisfactory academic progress, and expected completion date.

### **Awarding Policy**

BCI will prepare a roster of eligible currently enrolled students as of March 17, 2020. Each eligible student enrolled as of March 17, 2020 will receive a grant award in the amount of \$800.00.

Students that filed a Free Application for Federal Student Aid (FAFSA) and for which BCI has a current Institutional Student Information Record (ISIR) will be considered Title IV eligible. Students enrolled as of March 17, 2020 who did not previously file a FAFSA may choose to file a FAFSA for grant purposes, and BCI will consider the student to be Title IV eligible upon receipt of the student's ISIR and successful completion of any required verification.

BCI will make emergency need-based grants to eligible students with the Grant Funds remaining after the initial \$800.00 distributions described above. Eligible students will receive an email message informing them of their ability to apply for an emergency need-based grant, along with an application form (Exhibit C).

Eligible students who enroll after March 17, 2020 may apply for an emergency need-based grant. In order for such student to be considered for any need-based grant, such student must demonstrate that they have incurred expenses related to the disruption of campus operations due to coronavirus. Students who enroll after March 17, 2020 are not entitled to the initial \$800.00 grant award described above.

Other than any disclosures of this plan as may be required by the U.S. Department of Education or any other governmental or accrediting agency, BCI shall not make any disclosures, publication, statement, or other notices regarding the ability of students who enroll after March 17, 2020 to apply for an emergency need-based grant. Only after such student has signed an enrollment agreement with BCI will BCI provide such student with information regarding the application for an emergency need-based grant.

Eligible students may only receive one emergency need-based grant. BCI will make emergency need-based grants to eligible students until the Grant Fund is depleted. BCI intends to begin making emergency need-based grants on or about July 28, 2020 and complete the distribution of such grants by December 31, 2020.

### **Awarding Procedures**

BCI's Director and Financial Director will oversee the awarding and currently enrolled student census. BCI will deposit the Grant Fund in a separate dedicated checking account to be used for the sole purposes 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**

BCI will begin contacting students about the emergency financial aid grants on or about July 10, 2020. BCI 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 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 BCI. Students will complete the acknowledgment statement via DocuSign or send a signed copy of the statement to BCI.

The emergency financial aid grants will be distributed by checks made payable to the students. No grant checks will be disbursed to any otherwise eligible student who fails to or refuses to sign the acknowledgment statement.

Eligible students will have the option on how to receive their grant fund checks. Students may request to pick up their checks at BCI or have the check mailed to them using the address listed on the student's attestation statement or select Electronic Funds Transfer (EFT). Students will indicate their choice for receiving the grant checks on their acknowledgment statements. BCI will provide instructions for those students choosing to pick up their checks at BCI which will include available pick-up times as well as safe social distancing requirements. In addition to the emergency grant fund checks, the students will receive an instruction letter from BCI in the form attached as Exhibit B. Students who subsequently receive emergency need-based grants will receive a similar instruction letter.

**Accounting & Recordkeeping**

BCI's Chief Operating Officer (COO) and Financial Aid Director will be responsible for the administration of the emergency financial aid grants. All disbursements will be overseen by BCI's COO and Financial Aid Director.

BCI's COO and Financial Aid Director are responsible for all accounting and recordkeeping associated with the administration of the student emergency grants. They shall maintain an Excel spreadsheet to track all disbursements by student. BCI's Director 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.



## EXHIBIT C

### Emergency Financial Aid Grant Application

Under the Coronavirus Aid, Relief, and Economic Security (“CARES”) Act the U.S. Department of Education has made emergency financial aid grant funds available to students of our institution who are in need of financial support for their expenses related to the disruption of campus operations due to Coronavirus. This application permits students to apply for these need-based grants. The BCI’s administration will use the information you provide here to determine your eligibility for a grant and the amount for which you will be eligible. Each student will be eligible for only one grant, and only one application will be considered per student. Not every student who applies will necessarily receive an emergency need-based grant.

Please fill out this information neatly and completely and provide it to the BCI’s Financial Aid Officer or Director. Only active students who are participating in courses actively and who are in good standing will be eligible to receive a grant.

Student Name: \_\_\_\_\_ Email \_\_\_\_\_

Current Address: \_\_\_\_\_

Phone Number: \_\_\_\_\_

Have you incurred expenses due to disruptions caused by the Coronavirus Pandemic? \_\_\_\_ Yes  
\_\_\_\_ No

Check all situations that apply to you.

- \_\_\_\_ I am financially responsible for my food expenses
- \_\_\_\_ I am financially responsible for my housing expenses
- \_\_\_\_ I am financially responsible for expenses related to my course materials to attend school
- \_\_\_\_ I am financially responsible for paying for technologies associated with attending online classes
- \_\_\_\_ I am financially responsible for my own health care costs
- \_\_\_\_ I have children and am financially responsible for childcare expenses

I attest that all information is true and accurate, and I am requesting a one-time emergency need-based financial aid grant to help cover the cost of expenses incurred due to the Coronavirus pandemic. I understand that I will be unable to revise this request after submitting it. I understand that BCI’s determination of my eligibility for and the amount of any grant monies will be based on my responses to the questions above as well as information already on record with the

Institute, including but not limited to my dependency status, family size, expected family contribution, unmet financial need, program length, satisfactory academic progress, and expected completion date.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

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For Administration Use Only

Administrator Name: \_\_\_\_\_

Administrator Position \_\_\_\_\_

Student Eligibility Amount: \_\_\_\_\_