

## FLORIDA NATIONAL UNIVERSITY

### Disclosure regarding CARES Act Emergency Financial Aid Grants to Students

**Dated: October 10, 2020**

The federal stimulus legislation known as the *Coronavirus Aid, Relief, and Economic Security Act* ("CARES Act"), Pub. L. No. 116-136, signed into law by the President on March 27, 2020, included relief to institutions and students for costs associated with the COVID-19 (coronavirus) pandemic. Under Section 18004(a)(1) of the CARES Act, the U.S. Department of Education ("Department") has allocated funds to Florida National University (OPEID 025476), at least fifty percent (50%) of which must be used to provide emergency financial aid grants to students for expenses related to the disruption of campus operations due to the coronavirus (including eligible expenses under a student's cost of attendance such as food, housing, course materials, technology, health care, and child care) ("Emergency Grants"). See CARES Act § 18004(c).

In accordance with the Department's August 31, 2020, Federal Register Notice, the University provides the following information. This disclosure was initially posted 30 days following the University's receipt of its allocation under Section 18004(a)(1) of the CARES Act reserved for Emergency Grants, and will 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 Department specifies an alternative method of reporting.

1. The University acknowledges that it signed and returned to the Department the Certification and Agreement and assures that it 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 Grants to students.
2. The total amount of funds that the University will receive or has received from the Department pursuant to its Certification and Agreement [for] Emergency Financial Aid Grants to Students is: \$2,942,299.
3. The total amount of Emergency Grants distributed to students under Section 18004(a)(1) of the CARES Act as of the date of this disclosure is: \$2,939,099. This amount is based on two rounds of grant issuances conducted by the University, as described below.
4. The estimated total number of students at the University eligible to participate in programs under Section 484 in Title IV of the Higher Education Act of 1965 and thus eligible to receive Emergency Grants under Section 18004(a)(1) of the CARES Act is: Currently 2,521. This is based on the number of students for whom the University has received a valid Institutional Student Information Record (ISIR) plus the number of students who completed an alternative certification form developed by the University for this purpose, excluding students enrolled in an exclusively online program as of March 13, 2020 and newer students enrolled in a program that is always

offered fully online (i.e., Distance Learning Division programs), as these students are not eligible for Emergency Grants.

5. The total number of students who have received an Emergency Grant under Section 18004(a)(1) of the CARES Act is: 1,822 under the University's first round of grants and 1,616 under the University's second round of grants. An unduplicated total of 2,132 students have received at least one grant.
6. The method(s) used by the University to determine which students receive Emergency Grants and how much they would receive under Section 18004(a)(1) of the CARES Act:
  1. *Determination of Eligible Recipients:* To be considered for an Emergency Grant, a student must meet the Title IV Eligibility, Enrollment Status, and Attestation criteria established by the University:
    - a. *Title IV Eligibility:* In accordance with Department guidance, a student must establish their eligibility to participate in programs under Section 484 in Title IV of the Higher Education Act of 1965 in order to receive an Emergency Grant.
    - b. *Enrollment Status:* Emergency Grants are available only to students who meet the following enrollment requirements: (1) Was actively enrolled at the University (2) in a Title IV-eligible program (3) with a residential component, and (4) remained enrolled at the time grant funds are disbursed. For the first-round grants, this included any students enrolled as of March 13, 2020 and listed as "active" in FNU's records, including students on an approved leave that began in Term B of Spring 2020, and those who will return to school in the Fall semester. For the second-round grants, students not actively in attendance during Summer 2020, including students who took a leave of absence, are not eligible. Students who graduated, withdrew or otherwise are no longer enrolled at the time funds are disbursed will not receive an Emergency Grant. The University seeks to prioritize those students that it believes have the greatest need, as suggested by the Secretary of Education. For the first-round grants, the University concluded that those students with the greatest need resulting from disruptions of campus operations due to COVID-19 are most likely to be those students who were enrolled upon declaration of the COVID-19 pandemic (March 13, 2020), and who remained enrolled while disruptions of campus operations due to COVID-19 remain in effect. For the subsequent second-round grants, the University concluded that those students with the greatest need resulting from disruptions of campus operations due to COVID-19 during the Summer 2020 term are most likely to be those students who enrolled in a program that would be offered residentially in normal (i.e., non-COVID-19) circumstances, and who therefore had to pay for

internet connectivity (including enhanced internet connectivity) that otherwise would not be required for the program.<sup>1</sup>

- c. *Attestation*: To be eligible for an Emergency Grant, a student must submit, by the deadline established by the University, an attestation that they have incurred, or expect to incur, expenses related to the disruption of campus operations due to the coronavirus (including eligible expenses under a student's cost of attendance such as food, housing, course materials, technology, health care, and child care). Students will be instructed not to submit the attestation form unless they have incurred, or expect to incur, such expenses. Students will also be instructed to return Emergency Grant funds that exceed their relevant expenses.
  - d. *Determination of Grant Amounts*: For the first-round grants, the University awarded a grant in the amount of \$1,258.47 to each eligible recipient who submitted an attestation. This amount was determined by dividing the funding allocation established for Emergency Grants by the number of students potentially eligible for a grant. Remaining funds are being used for the second-round grants, which are being awarded in the amount \$400, to each eligible recipient who submits an attestation, to pay for high-speed internet access required to participate in online programs and other eligible costs.<sup>2</sup>
7. Instructions, directions, or guidance provided by the University to students concerning the Emergency Grants are included as Appendix A through Appendix H. These materials are current as of the date of this disclosure and are subject to change. Subsequent issuances of Emergency Grants, if any, may be in different amounts and subject to different eligibility criteria.

The CARES Act and FNU's Certification and Agreement to the Department contain additional reporting requirements, and the Department has announced that it will provide instructions for completing this reporting in the future. The University is

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<sup>1</sup> Under ED's interpretation, the CARES Act permits institutions to "distribut[e] the funds to all students." The University carefully considered ED's recommendation to prioritize those students with the most need and has determined that the Enrollment Status requirements described above present the best method available to identify such students. The University has considered other objective and uniform sources of available data (e.g., Expected Family Contribution), and concluded that no such data has a sufficient nexus to needs and expenses related to disruptions of campus operations due to COVID-19. The University's approach appropriately balances the need to identify students with expenses related to disruptions of campus operations due to COVID-19, with the objective of issuing the Emergency Grants in a prompt and equitable manner.

<sup>2</sup> Based on a review of internet costs, the University determined that \$100/per month would be appropriate for a reasonable level of high-speed internet which would enable students to participate in their programs online and successfully navigate FNU's distance learning platforms. Because a semester includes four months, the total Emergency Connectivity Grant amount is \$400, subject to reduction based on the availability of funds.

awaiting such further instructions before reporting information directly to the Department.

Questions regarding this disclosure should be directed to Omar Sanchez, Vice President and Director of Financial Aid, at [omarsnc@fnu.edu](mailto:omarsnc@fnu.edu).

## **Appendix A - Announcement Email (First-Round Grants)**

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### **AVAILABILITY OF EMERGENCY GRANTS TO STUDENTS - ACTION REQUIRED**

Dear [Student name] (Student ID [number]),

The federal stimulus legislation known as the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) signed into law by the President on March 27, 2020, allocates funding to institutions to provide emergency grants to students for expenses related to the disruption of campus operations due to the coronavirus (Emergency Grants). Florida National University has been allocated funds by the U.S. Department of Education to issue Emergency Grants to students.

The University has determined that you may be eligible for an Emergency Grant. Emergency Grants are available to students who have incurred, or expect to incur, expenses related to the disruption of campus operations due to COVID-19. This includes any eligible expenses under your cost of attendance—such as food, housing, course materials, technology, health care, and child care—that you incurred, or expect to incur, due to the University’s transition to online learning, or for another reason related to the disruption of campus operations.

Emergency Grants do not have to be repaid.

### **TO BE CONSIDERED FOR AN EMERGENCY GRANT, YOU MUST COMPLETE THE FOLLOWING REQUIREMENTS BY THE STATED DEADLINES:**

1. Attestation Form. If you incurred, or expect to incur in the future, expenses related to the disruption of campus operations due to COVID-19 (see above examples), please complete the Emergency Grant Attestation Form, which is available at the following link:

<https://na3.docusign.net/Member/PowerFormSigning.aspx?PowerFormId=ba7afb66-8a35-4041-bb60-6b8f20fe8f9d&env=na3-eu1&acct=4b557644-950d-4ee3-b00a-9870e7fe2252>

**The University must receive completed Attestation Forms by June 7, 2020.**<sup>3</sup> You are not eligible to complete the form if you have not incurred, and do not expect to incur, such expenses.

2. FAFSA. To be eligible for a grant, you must be eligible to receive Title IV funds and have a valid *Free Application for Federal Student Aid* (FAFSA) on file with the University.

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<sup>3</sup> [Note: After sending this notification, the University extended each June 7, 2020 deadline to June 14, 2020.]

- a. If you did not complete a FAFSA for the current academic year, you may do so now in order to be considered for an Emergency Grant. You may complete a FAFSA online at <https://fafsa.ed.gov/>. Be sure to complete a FAFSA for the 2019-2020 award year. **The University must receive your FAFSA information by June 7, 2020. If you have not already filed a FAFSA, you are strongly encouraged to complete a FAFSA online, at least two weeks before this deadline.** A FAFSA submitted late, or on paper, may not be received and processed by the University by the June 7 deadline.
- b. If you already filed a FAFSA and are receiving Title IV aid (e.g., Pell Grants; Direct Loans) for the current semester, you have already met this requirement.

Additional information about which students are eligible for Emergency Grants, and the University's process for awarding and disbursing the grants, will be posted to the University's website.

Please note that the Department of Education is informing institutions about the requirements for these grants on a rolling basis. Completing the Attestation Form or submitting a FAFSA does not guarantee that you will receive an Emergency Grant, or any particular amount of funds. If you have any questions, please contact Kesia Garlobo ([kgarlobo@fnu.edu](mailto:kgarlobo@fnu.edu)) or Omar Sanchez ([omarsnc@fnu.edu](mailto:omarsnc@fnu.edu)).

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**Appendix B - Attestation Form (First-Round Grants)**

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**EMERGENCY GRANT ATTESTATION FORM**

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

Student ID: \_\_\_\_\_

The Coronavirus Aid, Relief, and Economic Security Act (CARES Act) allocates funding to institutions to provide emergency grants to students for expenses related to the disruption of campus operations due to the coronavirus (Emergency Grants). Florida National University has been allocated funds by the U.S. Department of Education to issue Emergency Grants to students.

In order to be considered for an Emergency Grant, you must sign and return this form to the University via DocuSign no later than **June 14, 2020**.<sup>4</sup> If you are not truthfully able to make the following certification, you may not submit this form or receive an Emergency Grant.

Students who are awarded an Emergency Grant will receive an email with information about the amount of the grant and other instructions. Completing this Attestation Form or submitting a FAFSA does not guarantee that you will receive an Emergency Grant, or any particular amount of funds. Emergency Grants do not have to be repaid.

Student Attestation

(Initial Here) \_\_\_\_\_ I hereby certify and attest that I am eligible to receive federal Title IV financial aid funds and have incurred, or expect to incur in the future, expenses related to the disruption of campus operations due to the COVID-19 pandemic (including eligible expenses under my cost of attendance, such as food, housing, course materials, technology, health care, or child care). I further certify and attest that any Emergency Grant I receive based on this attestation will be used only for these expenses. If I do not use all of the Emergency Grant funds I am awarded for these expenses, I will contact the Financial Aid Office by March 15, 2021 to return any excess funds received.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

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<sup>4</sup> [Note: An initial version of this form listed a June 7, 2020 deadline, which has since been extended to June 14, 2020.]

## **Appendix C - Disbursement Notification (First-Round Grants)**

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### **EMERGENCY GRANT AWARD NOTIFICATION**

Dear [Student name] (Student ID [number]),

Based on the University's receipt of your signed Emergency Grant Attestation Form, and a valid Free Application for Federal Student Aid, you have been awarded the following Emergency Grant:

- Emergency Grant Amount: \$ \_\_\_\_\_.

As a reminder, you have attested (promised) that all Emergency Grant funds you receive will be used only for expenses related to the disruption of campus operations due to the COVID-19 pandemic (including eligible expenses under your cost of attendance, such as food, housing, course materials, technology, health care, or child care). These may be expenses you have already incurred or expenses you will incur in the future. However, if you do not use all of the Emergency Grant funds for these expenses, you must contact the Financial Aid Office by March 15, 2021 to return any excess funds.

The Emergency Grant funds will be mailed to your home address in the form of a check. If you have any questions, or if you do not receive your check within 21 days after receiving this email, please contact Kesia Garlobo ([kgarlobo@fnu.edu](mailto:kgarlobo@fnu.edu)) or Omar Sanchez ([omarsnc@fnu.edu](mailto:omarsnc@fnu.edu)).

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## **Appendix D - Announcement Email (Second-Round Grants)**

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### **INTERNET CONNECTIVITY GRANTS FOR SUMMER 2020 - ACTION REQUIRED**

Dear [Student name] (Student ID [number]),

FNU has determined that you are eligible for an Emergency Connectivity Grant because you were enrolled during Summer 2020 in a program being temporarily offered online due to the COVID-19 pandemic. The University was allocated funds to issue these grants to students under the federal stimulus legislation known as the CARES Act.

This grant is available because the online transition and related temporary closure of FNU's campuses required you to have internet access that would not otherwise be required for the program. **Emergency Connectivity Grants will be up to \$400, depending on the availability of funds. This money can be used to reimburse yourself for any internet connection—both home and mobile internet—that you relied on to participate in Summer 2020 coursework, or for other eligible costs.** These grants do not have to be repaid.

**TO BE CONSIDERED FOR AN EMERGENCY CONNECTIVITY GRANT, YOU MUST SUBMIT AN ATTESTATION FORM BY AUGUST 31, 2020, which is available at: [\[LINK\]](#)**

<https://na3.docusign.net/Member/PowerFormSigning.aspx?PowerFormId=ba7afb66-8a35-4041-bb60-6b8f20fe8f9d&env=na3&acct=4b557644-950d-4ee3-b00a-9870e7fe2252&v=2>

Additional information about the CARES Act grants and the University's process for awarding and disbursing the grants will be posted to the University's website. If you have any questions, please contact Kesia Garlobo ([kgarlobo@fnu.edu](mailto:kgarlobo@fnu.edu)) or Omar Sanchez ([omarsnc@fnu.edu](mailto:omarsnc@fnu.edu)).

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**Appendix E - Attestation Form (Second-Round Grants)**

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**EMERGENCY CONNECTIVITY GRANT ATTESTATION FORM**

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

Student ID: \_\_\_\_\_

Florida National University has been allocated funds to issue emergency grants to students under the federal stimulus legislation known as the Coronavirus Aid, Relief, and Economic Security Act (CARES Act). To be considered for an Emergency Connectivity Grant, you must sign and return this form to the University via DocuSign no later than August 31, 2020. Students must be Title IV-eligible and meet other requirements to receive a grant.

Completing this Attestation Form does not guarantee that you will receive a grant or any particular amount of funds. Grants do not have to be repaid.

Student Attestation

(Initial Here) \_\_\_\_\_ I hereby certify and attest that:

- (1) I am eligible to receive federal Title IV financial aid funds,
- (2) I was enrolled during the Summer 2020 semester in a program being temporarily offered online due to the COVID-19 pandemic, and
- (3) I will use the grant funds awarded to me based on this attestation to reimburse myself for expenses I incurred for an internet connection (*this may include both home and mobile internet*) that I relied on to participate in my Summer 2020 coursework **or** for any other expenses I incurred related to the disruption of campus operations due to coronavirus (including eligible expenses under my cost of attendance, such as food, housing, course materials, technology, health care, and child care). However, I will not use these funds to satisfy any expenses already covered by any CARES Act Emergency Grant funds I previously received from FNU. If I do not use all of the funds I am awarded for eligible costs, I will contact the Financial Aid Office by March 15, 2021 to return any excess funds received.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

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## **Appendix F - Disbursement Email (Second-Round Grants)**

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### **EMERGENCY CONNECTIVITY GRANT AWARD NOTIFICATION**

Dear [Student name] (Student ID [number]),

Based on the University's receipt of your signed Emergency Connectivity Grant Attestation Form, and a valid Free Application for Federal Student Aid or Title IV Eligibility Certification Form, you have been awarded the following Emergency Connectivity Grant:

- Emergency Connectivity Grant Amount: \$ [400].

As a reminder, this grant is being provided because you were enrolled during Summer 2020 in a program being temporarily offered online due to the COVID-19 pandemic. The online transition and related temporary closure of FNU's campuses required you to have internet access that would not otherwise be required for the program. This money can be used to reimburse yourself for any internet connection—*both home and mobile internet*—that you relied on to participate in Summer 2020 coursework. It may also be used for any other expenses you incurred related to the disruption of campus operations due to coronavirus (including eligible expenses under your cost of attendance, such as food, housing, course materials, technology, health care, and child care). However, you may not use this money to satisfy any expenses already covered by any CARES Act Emergency Grant funds you previously received from FNU.

This grant does not have to be repaid.

The grant funds will be mailed to your home address in the form of a check or issued as a direct deposit. If you have any questions, or if you do not receive your funds within 21 days after receiving this email, please contact Kesia Garlobo ([kgarlobo@fnu.edu](mailto:kgarlobo@fnu.edu)) or Omar Sanchez ([omarsnc@fnu.edu](mailto:omarsnc@fnu.edu)).

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## **Appendix G - Reminders**

The University has also issued reminders for eligible students who did not initially respond to the University's initial announcements. Further reminders may be issued as needed.

## **Appendix H - Title IV Eligibility Certification Form**

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### **TITLE IV ELIGIBILITY CERTIFICATION FOR EMERGENCY GRANTS**

***\*Please do not complete this form unless you have been instructed to do so by the Financial Aid Office.\****

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

Student ID: \_\_\_\_\_

The Coronavirus Aid, Relief, and Economic Security Act (CARES Act) allocates funding to institutions to provide emergency grants to students for expenses related to the disruption of campus operations due to the coronavirus (Emergency Grants). Florida National University has been allocated funds by the U.S. Department of Education to issue Emergency Grants to students.

Under U.S. Department of Education guidance, a student may receive an Emergency Grant only if they are or could be eligible to receive Title IV financial aid funds under the Higher Education Act of 1965. Students who have a 2019-20 Free Application for Federal Student Aid (FAFSA) on file with the University have already met this requirement. **Students who did not complete a 2019-20 FAFSA may complete this Certification Form if so directed by the Financial Aid Office.**

If you are asked to complete this form but are not truthfully able to make the following certification, you may not submit this form or receive an Emergency Grant. Completing the required Emergency Grant Attestation Form or this form, or submitting a FAFSA, does not guarantee that you will receive an Emergency Grant, or any particular amount of funds. Emergency Grants do not have to be repaid. **This form is due no later than [Month] [Day], 2020.**

#### Attestation for Students without Valid FAFSA (ISIR) on File

I hereby certify and attest, under the penalty of perjury under the laws of the United States and the State of Florida, that I am eligible to receive federal Title IV financial aid funds and that I understand and meet the following criteria:

- I am a U.S. citizen or a Title IV-eligible noncitizen;
- I hold a high school diploma or a recognized equivalent such as a General Educational Development (GED) certificate, or completed a high school education in a homeschool setting consistent with state law;
- I am enrolled as a regular student in a Title IV-eligible degree or certificate program;
- I am maintaining satisfactory academic progress in my educational program (including being on financial aid warning or financial aid probation status);
- I have a valid Social Security number (with the exception of students from the Republic of the Marshall Islands, Federated States of Micronesia, or the Republic of Palau);

- If I am male, I have registered with the Selective Service (you must register between the ages of 18 and 25);
- I am not in default on a federal student loan, do not owe money for an overpayment of federal student aid funds, and do not have property subject to a judgment lien for a debt owed to the United States;
- I am not currently enrolled in secondary school or incarcerated;
- I have not, while enrolled at a postsecondary institution and receiving Title IV funds, been convicted of an offense under federal or state law involving the possession or sale of illegal drugs, or if I have been so convicted, have regained Title IV eligibility due to the passage of time or otherwise (ask the Financial Aid Office for details if needed);
- If I have been convicted of, or pled nolo contendere or guilty to, a crime involving fraud in obtaining Title IV program assistance, I have completed the repayment of such assistance to the Department of Education or the holder of a loan, as applicable.

By signing below, you certify and attest under the penalty of perjury that you read, understand, and meet each of these criteria, and that each of the above statements is true to the best of your knowledge. Please contact the Financial Aid Office if you have questions about any of the requirements or terms listed above.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date