



February 24, 2021

TO: THE DISTRICT BOARD OF TRUSTEES OF VALENCIA COLLEGE

FROM: SANFORD C. SHUGART
President

RE: SPRING 2021 DISBURSEMENT OF CORONAVIRUS RESPONSE AND RELIEF SUPPLEMENTAL APPROPRIATIONS ACT (CRRSAA) STUDENT FINANCIAL AID GRANTS

On December 27, 2020, the President signed the Coronavirus Response and Relief Supplemental Appropriations Act (CRRSAA). Under CRRSAA, the United States Department of Education (ED) has made available \$21.2 billion to distribute to institutions of higher education to ensure learning continues for students during the COVID-19 pandemic through the Higher Education Emergency Relief Fund (HEERF II). Valencia College will receive a total of \$59.5 million in CRRSAA funds from ED. Of this amount, at least \$13.8 million must be used for student aid.

CRRSAA has some important differences from the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) relative to the student aid portion. First, CRRSAA requires that institutions prioritize students with exceptional need in awarding financial aid grants to students. ED encourages institutions to carefully document how they prioritize students with exceptional need in distributing grants to students as the Department intends to establish reporting requirements regarding the distribution of aid. Second, CRRSAA explicitly provides that financial aid grants to students may be awarded to students exclusively enrolled in distance education, whereas such students were explicitly excluded from CARES emergency aid eligibility. Third, unlike CARES, enrolled students do not have to be Title IV-eligible students to receive CRRSAA funds. ED has confirmed that the June 17, 2020 Interim Final Rule does not apply when awarding CRRSAA funds. However, it appears 8 USC 1611(a) of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, which prohibits certain noncitizens from receiving federal public benefits may still apply, which means that undocumented, DACA, and international students are currently not eligible for CRRSAA funds.

In designing the disbursement plan and in actually distributing these funds, Valencia has followed, and will follow, the requirements of CRRSAA as well as the requirements, instructions and guidance provided by the United States Department of Education and Federal Student Aid.

Valencia College will develop a detailed plan to disburse CRRSAA emergency aid to eligible students in the Spring 2021, Summer 2021, Fall 2021, and Spring 2022 semesters. To facilitate

disbursement of aid to eligible students during the Spring 2021 semester, Valencia College presents its plan to distribute CRRSAA student financial aid funds for consideration by and approval of the District Board of Trustees:

Spring 2021 Disbursement of Aid

The college will identify potentially eligible students who are registered in at least one course in Spring 2021 and are classified as degree-seeking. In addition, given the limitation currently posed by the 1996 welfare reform law (discussed above), a student must also be able to demonstrate eligibility under that law. Accordingly, for the limited purpose of confirming that eligibility status, the college will require the student to have a valid 2020-21 FAFSA on file.

On April 7, 2021, the college will send an email to all CRRSAA aid-eligible students with information about how to access a CRRSAA aid application. The application will only be available to students eligible to receive CRRSAA aid and will only be visible to students after they have logged into Atlas. The CRRSAA aid application will ask students to confirm that they have financial need related to the cost of attendance or emergency costs related to COVID-19 (such as tuition, food, housing, health care, or childcare). Applications will be due by April 20, 2021.

To fulfill the requirement of demonstrating preference to students with exceptional need, Spring 2021 CRRSAA aid-eligible students who have an estimated family contribution (EFC) of zero and who complete an application for aid will receive a grant in the amount of \$500. EFC is an index number used to calculate how much financial aid students are eligible to receive; an EFC of zero reflects maximum aid eligibility. CRRSAA aid-eligible students who submit an application but do not have an EFC of zero will receive a grant in the amount of \$300.

With one possible exception, grants will be delivered to students via the preferred method identified by students through BankMobile, Valencia's third-party provider used to process student disbursements. The one possible exception is as follows: CRRSAA, unlike CARES, permits students to express a preference of posting the grant to their college account. The college is exploring this possibility. Should the college proceed with this option, it will be an opt-in process that requires affirmative written consent from the student before posting the grant to their account. Moreover, if a student declines to "opt-in," that decision will in no way affect the student's receipt of or eligibility for a grant.

The College's plan as presented has been drafted in consultation with outside counsel, expert in federal funding matters such as presented here. The consulting attorneys will be providing Valencia with a formal written legal opinion expressing their agreement that the College's plan is compliant with the requirements of the law and related official guidance.

RECOMMENDED ACTION:

The President recommends that the District Board of Trustees of Valencia College authorize the College to disburse CRRSAA student financial aid funds in accordance with the plan as presented,

and that the Board further authorize the College to adjust the disbursement plan in a compliant manner as necessary or appropriate in the event new official guidance is issued with respect to Coronavirus Response and Relief Supplemental Appropriations Act (CRRSAA) disbursements.

A handwritten signature in black ink, reading "Sanford C. Sheyart". The signature is written in a cursive style with a vertical line to its right.

President