

Higher Education Emergency Relief Fund Report – Emergency Financial Aid Grants to Students

May 20, 2020 (Updated 3/31/2021)

Tulsa Welding School Inc. (OPE ID: 00961800) received education stabilization funds under Section 18004(a)(1) of the Coronavirus Aid, Relief, and Economic Security Act (“CARES Act”), Public Law No: 116-136. This Fund Report applies to the student portion received under the Higher Education Emergency Relief Fund that is designated exclusively for emergency financial aid grants to students.

The institution appreciates that Congress and the President have made these critical funds available for eligible students who have expenses related to the disruption of campus operations due to the coronavirus pandemic. We take receipt of these federal funds seriously and are distributing them in accordance with the CARES Act and implementing guidance.

The institution is making the below information available for transparency purposes and in compliance with the U.S. Department of Education’s (“Department”) Electronic Announcement of May 6, 2020.¹ For questions or concerns regarding this Fund Report, please contact **Christina Andrews, VP Financial Aid**, at Christina.andrews@stratatech.com.

1. The institution signed and returned to the Department the Certification and Agreement [for] Emergency Financial Aid Grants to Students. The institution 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 financial aid grants to students.
2. The total amount of funds that the institution will receive or has received from the Department pursuant to the institution’s Certification and Agreement [for] Emergency Financial Aid Grants to Students is **\$2,752,887**.
3. The total amount of emergency financial aid grants distributed to students under Section 18004(a)(1) of the CARES Act as of the date of this Fund Report is **\$2,796,516.23**
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 under Section 18004(a)(1) of the CARES Act, as of the date of this Fund Report is **3381**.
5. The total number of students who have received an emergency financial aid grant under Section 18004(a)(1) of the CARES Act as of the date of this Fund Report is **2046**.
6. The methods 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 are provided at **Attachment A**.
7. Any instructions, directions, or guidance provided by the institution to students concerning the emergency financial aid grants are provided at **Attachment B**.

¹ See: <https://ifap.ed.gov/electronic-announcements/050620HigherEdEmergencyReliefFundRptg>

Attachment A

TWS/RSI Cares Act Grant (Higher Education Emergency Relief Fund (HEERF))

Overview

Under the [Coronavirus Aid, Relief, and Economic Security Act \(CARES Act\)](#), funding was designated to provide emergency grants directly to students to help cover expenses incurred due to disruptions in campus operations caused by the novel coronavirus (COVID – 19). This funding is not considered Federal financial aid under Title IV of the Higher Education Act (HEA) and will not be considered when budgeting a student’s financial aid eligibility. A student must be a U.S. citizen or eligible non-citizen to receive HEERF funding.

To remain compliant under Section 18004(c) of the CARES Act, this policy outlines the expectations and process of:

- Determining student eligibility
 - Identifying possible eligible students
 - Application Steps and Communication
- Grant administration
 - Application
 - Application Components
 - Application Steps and Communication
 - Approval Process
 - Awarding
 - Award Confirmation
 - Disbursement procedures
 - Batching and posting
 - Stipend processing
 - G5 Draw down
- Grant amount allocations
- Reporting

Cares Act Grant Eligibility

Only students eligible to receive Title IV funding, although not required to have applied or be a recipient, as defined in Section 484 in Title IV of the Higher Education Act of 1965, as amended (HEA), may receive The Cares Act Grant.

Students must have also incurred expenses due to the disruption of campus operations caused by COVID – 19 and agree to use the funding to pay for those expenses. These funds are intended to help cover a student's expenses, including but not limited to, the following:

- Food;

- Housing, such as expenses incurred due to having to move back home or find other housing when school or housing closed;
- Health care;
- Child care;
- Technology-related expenses, such as having to buy a computer or internet expenses when the student's courses are moved online;
- Transportation, such as having to fly home because classes were cancelled or having to return when campus reopened.

Identifying Possible Eligible Students

The eligible population will be identified through the following steps:

1. The first wave, The Cares Act Grant (CAG) Task Force will review:
 - a. Comments from Wellness Check calls made soon after cessation of on-site instruction to determine if any student self-reported any hardships due to disruptions of campus operations caused by COVID – 19 that may qualify;
 - b. Comments of LOA students to determine if their purpose for the LOA is a qualifying hardship;
 - c. The current notes/activities of any students who have self-reported in person or on phone a possible qualifying hardship.
2. Continuous wave:
 - a. All campus departments will refer students who express hardships to the CAG Task Force for further counseling.
3. Affirmative Outreach regarding grant: Email and/or text to all current students introducing the Cares Act Grant with instructions on how to obtain more information
 - a. Phone number to leave a voice mail
 - b. Email address to request information

Grant Administration

Careful and efficient administration of the Cares Act Grant funding is necessary when applying, approving, awarding, and disbursing.

Application

Application Components

Students who wish to receive an emergency grant must complete the TWS/RSI Cares Grant application. The application is divided into four main areas that are designed to collect necessary student identifiable information, categorize (student selection) experienced hardships due to disruptions in school operations caused by COVID-19, instruct students on the appropriate uses of the funds, and signify reviews and approvals.

1. The first area is the student identification zone. This is where the student will complete their identifying information:

- a. Student name;
 - b. Student Date of Birth; and
 - c. Student address.
- This will need to be where they want their check mailed to.*
2. The second area is the category application. Each category is a component of the Cost of Attendance listed in Section 18004(c) of the CARES Act.
 3. The third area is the “Intended Use Affirmation”. Student Services (or designated department) must witness (including via phone) the student verbally recite the affirmation to ensure understanding of the purpose of the grant funding.
 4. The fourth area is approval and signatures.
 - a. Cares Act Grant Review Committee;
 - b. Final Cares Act Grant Approver; and
 - c. Award amount approved.

Application Steps and Communication

The CAG Task Force will reach out / speak to each student and discuss their specific situations, identifying if any hardships exist that meet Grant Eligibility. Once probable eligibility is determined, the CAG Task Force will:

1. Walk each student through the process of filling out an application including going over each category in detail.
 - a. Suggest appropriate categories based on conversation; and
 - b. Offer examples of scenarios that fall into each category if the student appears confused by them.
2. Ensure student completes name, date of birth (DOB) and address information completely.

Checks will go to address on form (may need to be added into campus at awarding)
3. Ensure the student adds a description for each category applicable to their situation, including the time frame the category is relevant.
4. Request the student to verbally cite the intended use affirmation and then have them sign.

Approval Process

The “CAG Review Committee” will review and determine student eligibility, award funding and schedule stipends. The CAG Review Committee will review and execute the following steps notated by the completion of an official checklist:

1. Each application will be reviewed for completeness and eligibility.
2. The explanation of each category requested will be reviewed to determine if it meets minimum eligibility requirements (is it a legitimate expense caused by disruption to campus operations due to COVID – 19);
3. An amount will be assigned to each category based on individual circumstances, reasonable expectation of expense and consistency with other awarding.
4. Notation of category and time frame awarded will be maintained on an official checklist.
5. A total of all category amounts will be reflected next to CAG Review Committee reviewer’s signature.

6. Award will be created and added to Campus Nexus with one disbursement using the “Cares Act Grant” Fund Source. The disbursement will be scheduled for the next Thursday after approval date. If approved on a Thursday, the following Thursday should be the disbursement date.
7. Once award is created, the CAG Review Committee will forward the application and Official Checklist to the Final Cares Act Grant Approver (FCAGA).
8. FCAGA reviews application and Official Checklist.
 - a. If agrees, signs the Application and sends packet back to CAGC Committee
 - b. If disagrees, notates changes on Official Checklist and sends packet back to CAG Review Committee
9. CAG Review Committee will provide a new Offer letter to the student reflecting grant amount awarded.
10. Once the Offer letter has been signed by the student (DocuSign is acceptable), the award will be approved and account will be added to the HEERF Grant Tracker.
 - a. The tracker will record student ID, student name, amount awarded, disbursement scheduled dates, and stipend dates.
 - b. Stipend will be scheduled to correlate with the disbursement date and ensure the stipend address is the same as the address on the application.

Disbursement Process

To ensure students are receiving the CAG funding timely, all batching, posting and release of stipends will occur each week, on Thursdays for all approved CAG awards. The process is as follows:

1. A Batcher will create a batch for each campus of all approved, scheduled CAG Disbursements as the only fund source.
 - a. The Batcher will review each batch to ensure students are either in an enrollment status of Active Category (Active/Probation/Pending Dismissal) or Leave of Absence and remove any ineligible disbursements.
 - b. Once the review is complete, the batch will be approved and saved.
 - c. The batch report will be printed for record keeping purposes.
2. Once a batch has been created and saved for each campus, the Batcher will send an email (to include attaching the batch reports) with a record of the batch amount and number of students per campus to QC for posting.
3. QC will review batches and run the Cares Grant posting job.
4. Once the Posting job has completed, QC will forward the original email to the appropriate Business Office personnel copying the appropriate Accounting Department personnel to provide G5 Draw amounts.
5. The Business Office will run the Stipend Refund Check Register for The Cares Act Grant fund source utilizing the Cares Act Grant Bank Account.
6. Once checks are printed, Business Office will:
 - a. **Reply all** to the email confirming amount printed;
 - b. Transmit the posi-pay file to bank;
 - c. Have appropriate signers sign the checks; and
 - d. Mail all checks.
7. Accounting will draw down funding from G5.

- a. Ensure all Title IV transactions and G5 transfers have been completed prior to initiating Cares Act Grant process
 - b. Draw funding into Trust Accounts from G5.
 - c. Move funding from Trust Accounts to Cares Act Grant Account for the associated OPEID.
- ☑ The funding must be drawn and moved the same day and in the same amounts to ensure no comingling of funds can be perceived. Documentation of the draw and transfers will be recorded and filed for audit access.*

Grant Amount Allocations

The method for determining the amount of grant per students is based on cost category and need level. There are six main cost categories based on the components of the Cost of Attendance listed in Section 18004(c) of the CARES Act. The categories will be identified by students with a brief description. The eligibility and award amount will be determined by the CAG Review Committee based on the student's description, and confirmed by the FCAGA. The minimum award amount is \$300 and Maximum is \$6000 total per student.

Reporting

Reporting to the Secretary of the following information will be required: how grants were distributed to students, how the amount of each grant was calculated, and any instructions or directions that the institution gave to students about the grant. Institutions must also comply with the reporting requirements under Section 15011 of the CARES Act. The Department will publish a notice in the Federal Register to provide instructions to institutions on these reporting requirements.

The HEERF Grant Tracker/Award Checklists and this policy will assist in the required reporting. When further guidance is issued this section will be updated to reflect the full reporting process. In the interim, the institutions will comply with the disclosure requirements specified in the Department's May 6, 2020 electronic announcement.

Identified reporting to be maintained:

1. HEERF Grant Tracker
2. Batch Report
3. Reconciliation email showing total batch and total stipend amounts processed
4. G5 Transaction reporting
5. Monthly Cash Receipts Detail
6. Instructions, directions, or guidance provided to students concerning the CARES Act Grants
7. Completed student applications

Cares Act Grant Process Amendment

Dated: 06/16/2020

Summary

In order to determine the appropriate mechanism for disbursing emergency grants provided for students under the CARES Act, over a period of four weeks, the Cares Act Grant (CAG) Task Force reached out to students previously identified as most probable to have been financially impacted by the disruptions to campus operations due to COVID-19 and asked these students what types of expenses they were incurring. During this process we were able to identify a trend in common expenses impacting the majority of students. We developed two main categories of students who can be assumed to have had the same expense(s) due to the disruption of campus operations, subject to their attestation to having such expenses. Reports have been run to identify the population for each category.

- Housing:
 - Loss of Basic Allowance for Housing (BAH) for 2 months due to LOA (requested due to campus operations being disrupted during the COVID-19 epidemic)
 - Estimated Population = 52 Students
 - Includes all VA students certified for education benefits in VA Once that went on LOA in the months of April and May (months affected by campus operational disruptions)
 - Extended Rent responsibility for 1 to 2 months due to rephase or LOA due to campus operations being disrupted during the COVID-19 pandemic for students who relocated to attend school
 - Estimated Population = 152 Students
 - Includes all students whose address on application for enrollment is more than 99 miles from campus and had an extended graduation due to LOA or rephase during April or May (months affected by campus operational disruptions)
- Technology
 - Wifi or other internet connectivity for 3 months for all students as they were required to complete attendance and coursework online
 - Computers and equipment for all students, needed to attend and complete coursework online
 - Phone connectivity for all students, needed to attend the audio portion of courses remotely
 - Estimated Population = 2250
 - Includes all students currently active or on LOA who were enrolled prior to 5/15/2020; online classes were required from 3/16/2020 through 6/7/2020

In order to better ensure that students receive emergency grants promptly, and based on the CAG Task Force's findings, grants for the above costs will not require an application; however a form Award Letter will be created for students to sign reflecting the amount awarded and why. This Award Letter will also have an attestation that must be initialed by the student stating they have incurred expenses identified in the award breakdown, they understand this funding must be used toward such expenses, and that funds not used toward such expenses must be returned to the school, at which point the school will

either award the excess funds to another student in need or return the funds to the U.S. Department of Education.

To ensure students do not receive duplicative funding, all populations will be reviewed and compared to processed applications and any students already awarded emergency grants for similar category(ies) will be removed from the awards granted under this amendment.

Cares Act Grant Process 2nd Amendment

Dated: 9/8/2020

Summary

In order to determine the appropriate mechanism for disbursing emergency grants provided for students under the CARES Act, over a period of four weeks, the Cares Act Grant (CAG) Task Force reached out to students previously identified as most probable to have been financially impacted by the disruptions to campus operations due to COVID-19 and asked these students what types of expenses they were incurring. During this process we were able to identify a trend in common expenses impacting the majority of students. We developed two main categories of students who can be assumed to have had the same expense(s) due to the disruption of campus operations, subject to their attestation to having such expenses. Those awards were exhausted in June. We have since started new cohorts of students that are also impacted by classes going back to online due to increases in the number of COVID cases in the nation. These new cohorts in the TWS schools will also receive funding to assist in their unexpected technological expenses in relation to these online courses.

- Parameters
 - Expected cost = computers and equipment for all students, needed to attend and complete coursework online; online classes are required for all campuses for classroom work (1 day a week)
 - Estimated Population = 1453
 - Includes all students currently enrolled in Tulsa Welding Schools who started their programs 6/15/2020 – 8/30/2020 and have a valid ISIR on file to ensure they are Title IV eligible
 - online classes are required for all campuses for classroom work (1 day a week)

In order to better ensure that students receive emergency grants promptly, and to remain consistent with prior awarding procedures, grants for the above costs will not require an application; however a form Award Letter will be created for students to sign reflecting the amount awarded and why. This Award Letter will also have an attestation that must be initialed by the student stating they have incurred expenses identified in the award breakdown, they understand this funding must be used toward such expenses, and that funds not used toward such expenses must be returned to the school, at which point the school will either award the excess funds to another student in need or return the funds to the U.S. Department of Education.

To ensure students do not receive duplicative funding, all populations will be reviewed and compared to processed applications and any students already awarded emergency grants for similar expenses will be removed from the awards granted under this amendment.

Attachment B

Application Steps and Communication

The CAG Task Force will reach out / speak to each student and discuss their specific situations, identifying if any hardships exist that meet Grant Eligibility. Once probable eligibility is determined, the CAG Task Force will:

1. Walk each student through the process of filling out an application including going over each category in detail.
2. Ensure student completes name, date of birth (DOB) and address information completely.
☑ Checks will go to address on form (may need to be added into campus at awarding)
3. Ensure the student adds a description for each category applicable to their situation, including the time frame the category is relevant.
4. Request the student to verbally cite the intended use affirmation and then have them sign.

Application Verbaige

To be awarded the Grant, students must:

- Be enrolled in one of our educational programs;
- Be eligible to participate in Title IV programs;
- Have incurred expenses due to disruptions in campus operations caused by COVID-19;
- Agree to use funding to pay for those expenses; and Complete a Cares Act Grant Request Form.
- Grants are based on demonstrated need related to disruptions in campus operations caused by COVID-19.
- Grants are not transferable or renewable and cannot be used toward institutional costs.
- Only one award will be given per student. (except if provided award through Technology/Housing Group awarding)
- Grants will be distributed as one disbursement within 10 days of signing Offer Letter reflecting approved award.
- Grants will be awarded on a first-come, first-served basis, at a minimum of \$300 and a maximum of \$6,000 for eligible applicants.

Affirmation

I understand that in order to be eligible for this Grant, I must meet the admissions requirements for the program for which I am enrolled, as well as all of the criteria as outlined by the Cares Act Grant program. By submitting this request form, I affirm that the facts set forth in it are true and complete. I understand that if I am awarded this grant, all funds will be utilized towards expenses incurred due to disruptions in campus operations caused by COVID-19.

Students identified in Amended Technology and Housing Group Awarding

Students who are identified through the Cares Act Grant Process Amendment process dated 6/16/2020 will be given an award letter to review reflecting the award amount, category and responsibility of accepting the award. A school representative will review the document with the student and obtain any signed acceptances.