

## MLI HEERF III ARP Student Grant Report, 4Q 2021

### MLI HEERF III ARP Student Grant Structure and Methodology

The Higher Education Emergency Relief Fund III (HEERF III) is authorized by the American Rescue Plan (ARP), Public Law 117-2, signed into law on March 11, 2021, providing \$39.6 billion in support to post-secondary institutions to serve students and ensure learning continues during the COVID-19 pandemic.

ARP funds are in addition to funds authorized by the Coronavirus Response and Relief Supplemental Appropriations Act, 2021 (CRRSAA), Public Law 116-260 and the Coronavirus Aid, Recovery, and Economic Security (CARES) Act, Public Law 116-136. Emergency funds available to institutions and their students under all emergency funds total \$76.2 billion.

These funds are available for supplements and new formula grants to assist public and private post-secondary institutions in preparing for, preventing, and responding to the coronavirus pandemic.

### U.S. Department of Education Funds Distribution Guidance

Section 2003(7) of the ARP requires **Metropolitan Learning Institute (MLI)**, a post-secondary institution as defined in section 101 or 102(c) of the Higher Education Act of 1965, as amended (HEA), 20 USC § 1001 or 1002(c), to provide emergency financial aid grants to students in an amount equivalent to the sum of two amounts: 50 percent of the portion of its allocation that is based on formula factors from CRRSAA section 314(a)(1)(A)-(D) and 100 percent of the portion of its allocation that is based on formula factors from CRRSAA section 314(a)(1)(E)-(F). The amount of funds made available by this award under P425E203711 - 20B represents the minimum amount that MLI must use for making emergency financial aid grants to students. 2. Under section 2003(7) of the ARP and section 314(c)(3) of the CRRSAA, MLI must make emergency financial aid grants to students (which may include students exclusively enrolled in distance education), which may be used for any component of the student's cost of attendance or for emergency costs that arise due to coronavirus, such as tuition, food, housing, health care (including mental health care), or child care.

MLI acknowledges that it retains discretion to determine the amount and availability of each individual financial aid grant consistent with all applicable laws, including nondiscrimination laws. MLI further acknowledges that under section 314(c)(3), it must prioritize grants to students with exceptional need, such as students who receive Pell Grants. MLI acknowledges that it may not condition the receipt of such a financial aid grant on continued or future enrollment with the institution. MLI also acknowledges that it may not require a student to consent to the application of the financial aid grant to the student's outstanding account balance with the institution as a condition of receipt of or eligibility for the financial aid grant.

The Institution should consider each student's particular socioeconomic circumstances in the administration of these grants.

Added eligibility criteria by the U.S. Department of Education, published May 11th, 2021, is that students selected to receive funds from the ARP Act HEERF Students Emergency Grant, are any individual who is or was enrolled (as defined in 34 CFR § 668.2) at an eligible institution (as defined in 34 CFR § 600.2) on or after March 13, 2020, the date of declaration of the national emergency due to the coronavirus (85 FR 15337). Thus, students are no longer required to be eligible for Title IV student financial aid in order to receive HEERF grants to students. In short, students who are or were enrolled in a post-secondary institution during the COVID-19 national emergency are eligible for emergency financial aid grants from the HEERF, regardless of whether they completed a Free Application for Federal Student Aid (FAFSA) or are eligible for Title IV. Institutions are directed with the ARP funds to prioritize students with exceptional need, such as students who receive Pell Grants or are undergraduates with extraordinary financial circumstances in awarding emergency financial aid grants to students.

## U.S. Department of Education Reporting Requirements

MLI must promptly and timely provide a detailed accounting of the use and expenditure of the funds provided by this award in such manner and with such frequency as the U.S. Secretary of Education may require. The institution must also promptly and timely provide a detailed accounting of the use of funds provided by this supplemental award in such manner and with such subsequent frequency as the Secretary may require. MLI acknowledges USDE may require additional or more frequent reporting to be specified by the Secretary.

## Higher Education Emergency Relief Fund (HEERF III) American Rescue Plan Formula allocations to MLI

CURRENT AWARD AMOUNT \$1,218,647.00  
PREVIOUS CUMULATIVE AMOUNT \$660,220.00 (CARES Act)  
CUMULATIVE AMOUNT \$1,878,867.00

## HEERF III ARP Student Grant Awarding Structure

MLI's total allocation from the HEERF III Student Emergency Grant is \$609,323.50, representing 50% of the total current award given above. Approximately 550 students are potentially eligible to receive these grants.

### Base Rate

There is a fixed dollar amount that every eligible student enrolled at MLI will receive. This may be adjusted by EFC, with EFC 0 students receiving the highest amount. Students with an EFC greater than zero may receive somewhat less.

### Student Eligibility

According to USDE, "Eligibility To Receive Emergency Financial Aid Grants to Students Under HEERF" (May 14, 2021, 86 FR 26608) (final rule), the term "student," for purposes of the phrases "grants to students," "emergency financial aid grants to students," and "financial aid grants to students" as used in the HEERF programs, is now defined as **any individual who is or**

**was enrolled** (as defined in 34 CFR § 668.2) at an eligible institution (as defined in 34 CFR § 600.2) on or after March 13, 2020, the date of declaration of the national emergency due to the coronavirus (85 FR 15337). Thus, **students are no longer required to be eligible for Title IV student financial aid in order to receive HEERF grants to students.** Beyond Pell eligibility, other types of exceptional need could include students who may be eligible for other federal or state need-based aid or have faced significant unexpected expenses, such as the loss of employment (either for themselves or their families), reduced income, or food or housing insecurity. In addition, the ARP guidelines explicitly state that emergency financial aid grants to students may be provided to students exclusively enrolled in distance education provided the institution prioritizes exceptional need.

## Campus Allocations-4<sup>th</sup> Quarter 2021

### MLI Campus Allocation Student Disbursement

Campus	Student Grants	# of Eligible Students	# of Students Paid	Average Amount Paid
Rego Park Main Campus	\$ 22,008.17	60	31	\$709
Brooklyn Extension Campus	\$ 32,919.09	70	54	\$609
Totals	\$54,927.26	130	85	\$659

MLI will continue to allocate ARP funds into 2022 based on the grant structure described above. Disbursements were made via check payments to students in October and December of 2021. As shown above, the funds were issued to students enrolled at MLI who met the eligibility criteria.

### Student Communications

Awarded students with the ARP HEERF III Student Emergency Grants will receive periodic communications from their Campus Director and a letter and application form to complete for their grants. Copies of these letters are available upon request for past rounds of grant disbursements. Grant forms received by the school are processed by the Financial Aid Department and are archived at the Main Campus in Rego Park.