

## **September 30, 2020-- CARES Update**

### **Institutional Aid Portion of the Higher Education Emergency Relief Fund**

Pursuant to Section 18004(c) of the CARES Act (“Institutional Aid Portion”) the USDOE allocated \$879,068 to the college. This award is separate from the funding made available for Emergency Aid Grants to Students described above.

The college has signed and returned to the USDOE the Certification and Agreement and the assurance that the college intends to use the award for any costs associated with significant changes to the college’s delivery of instruction due to the COVID-19 pandemic. Such costs do not include payment to contractors for the provision of pre-enrollment recruitment activities, including marketing and advertising; endowments; or capital outlays associated with facilities related to athletics, sectarian instruction, or religious worship.

Pursuant to the CARES Act, the college retains discretion in determining how to allocate and use the award provided, as long as funds are spent only on those costs for which the college has a reasoned basis for concluding such costs arose from significant changes to the delivery of instruction due to the coronavirus. Allowable costs include the college’s Institutional Costs first incurred on or after March 13, 2020 (the date of the Proclamation of National Emergency), such as reimbursing itself for costs related to refunds made to students for services that the college could no longer provide; for lost revenues; or for hardware, software, or internet connectivity that the college may have purchased on behalf of students or provided to students; or the college’s technology costs associated with a transition to distance education. Funds may also be used to make additional emergency financial aid grants to eligible students, provided that such grants are for expenses related to the disruption of campus operations due to coronavirus.

Consistent with Section 18006 of the CARES Act and to the greatest extent practicable, the college will pay all of its full-time employees and contractors during the period of any disruptions or closures related to the coronavirus. The following expenditures are disallowed: senior administrator and/or executive salaries, benefits, bonuses, contracts, incentives; stock buybacks, shareholder dividends, capital distributions, and stock options; and any other cash or other benefit for a senior administrator or executive.

The college will comply with all reporting requirements and submit all required quarterly reports to the USDOE, at such time and in such manner and containing such information as the USDOE may reasonably require.

### **Strengthening Institutions Program Portion of the Higher Education Emergency Relief Fund**

Pursuant to Section 18004(a)(2) of the CARES Act (“Strengthening Institutions Program”) the USDOE allocated \$ 85,865 to the college as a designated eligible institution in FY 2020 under the Higher Education Act. This award is separate from the funding made available for Emergency Financial Aid Grants to Students and Institutional Aid described above.

The college has signed and returned to the USDOE the Certification and Agreement with the assurance that the college intends to use the award to defray expenses incurred by the college on or after March 13, 2020 (the date of the Proclamation of National Emergency), including lost revenue, reimbursements

for expenses already incurred, technology costs associated with a transition to distance education, faculty and staff trainings, and payroll. The college may also use funds for grants to students for any component of the student's cost of attendance.

Consistent with Section 18006 of the CARES Act and to the greatest extent practicable, the college will pay all of its employees and contractors during the period of any disruptions or closures related to the coronavirus. The following expenditures are disallowed: senior administrator and/or executive salaries, benefits, bonuses, contracts, incentives; stock buybacks, shareholder dividends, capital distributions, and stock options; any other cash or other benefit for a senior administrator or executive.

The college will comply with all reporting requirements and submit required quarterly reports to the Secretary, at such time and in such manner and containing such information as the Secretary may reasonably require.