



August 11, 2021

**The American Rescue Plan (ARP), 2021
Higher Education Emergency Relief Fund III (HEERF III)**

The American Rescue Plan Act of 2021 (ARP) (Pub. L. 117-2) was signed into law on March 11, 2021 by the President Biden. This new law gives the Department of Education an additional \$39.6 billion for higher education institutions to ensure learning continues for students during the Covid-19 pandemic under the CRRSAA as The Higher Education Emergency Relief Fund III (HEERF III).

The financial aid grants awarded to Bennett Career Institute by the U.S. Department of Education are governed by section 2003 of the ARP and 314 of the CRRSAA and the terms and conditions of this Certification and Agreement. Bennett Career Institute acknowledges the following:

- Proprietary institutions must use the funds made available by this supplemental award under Assistance Listing Number 84.425 Q only for emergency financial aid grants to students as described in section 314(c)(3) of the CRRSAA.
- Emergency financial aid grants for students (which may include students exclusively enrolled in distance education), may be used for any component of the student's cost of attendance or for emergency costs that arise due to the coronavirus, such as tuition, food, housing, health care (including mental), and childcare.
- The Institution retains discretion to determine the amount and availability of each individual emergency financial aid grant consistent with all applicable laws, including non-discrimination laws which prevents discrimination against individuals on the basis of race, color, national origin, disability, or sex.
- The CRRSAA requires that institutions under section 314(c)(3) prioritize students with exceptional need, such as students who receive Pell Grants, in awarding financial aid grants to students. However, students do not need to be eligible for Title IV funds.
- Institutions are not permitted to (1) condition the receipt of financial aid grants to students on continued or future enrollment in the institution, (2) use the financial aid grants to satisfy a student's outstanding account balance, unless it has obtained the student's written or electronic affirmative consent, or (3) require such consent as a condition of receipt of or eligibility for the financial aid grant.
- The Institution will hold these grant funds in trust for student and act in nature of a fiduciary for students.
- The Institution acknowledges that the Secretary recommends (a) the maximum Federal Pell Grant for the applicable award year as an appropriate maximum amount for a student's

emergency funds in most cases, and (b) the Institution will consider each student's socioeconomic circumstances in the administration of these grants.

- The financial aid administrator will exercise the use of professional judgement available under HEA section 479A, 20 USC 1087tt, to make adjustments on a case-by-case basis to exclude individual emergency financial aid grants from the calculation of a student's expected family contribution.
- The Institution acknowledges that it may voluntarily decline all or a portion of its ARP (a)(4) student funds to the Department by August 11, 2021.
- The Institution acknowledges that to assist with the management and oversight of this ARP (a)(4) grant, it must first complete and submit to the Department the required Proprietary Institution Certification form (OMB Control #1840-0855) prior to receiving supplemental grant award.

Distribution of Student Grants under the Higher Education Emergency Relief Fund III – ARP Policy and Procedures

Preamble

The HEERF III – ARP provides emergency assistance and health care response for individuals, families, and businesses affected by the coronavirus pandemic. The ARP includes the provision of approximately \$39.6 billion for the Higher Education Emergency Relief Fund III. Institutions of higher education are to receive an allocated share of this fund under a formula based on student enrollment described in the Act and to be administered by the Secretary of the U.S. Department of Education. The ARP requires, in part, that “Institutions of higher education shall use HEERF III funds to provide emergency financial aid grants to students for any emergency cost that arise due to the coronavirus (including eligible expenses under a student's cost of attendance, such as tuition, food, housing, health care, and childcare).”

As announced by the Secretary, Bennett Career Institute (BCI) is to receive \$134,751 (the “Grant Fund”) for the purposes of making emergency financial aid grants to its students. This document sets forth BCI's plan for allocating, disbursing and accounting for the Grant Fund.

Just as COVID-19 does not discriminate on the basis of socioeconomic status, BCI recognizes that a wide array of individuals and industries have been adversely impacted by COVID-19. BCI recognizes that our students' lives have been severely disrupted by coronavirus. Many are facing financial challenges and struggling to make ends meet. Eligible students will receive an email message from the Financial Aid Office informing them of their ability to apply for an emergency need-based grant, along with an application form (Exhibit E).

Eligible students who are currently enrolled may apply for an emergency need-based grant. In order for such student to be considered for any need-based grant, such student must demonstrate that they have incurred expenses due to the coronavirus.

Other than any disclosures of this plan may be required by the U.S. Department of Education or any other governmental or accrediting agency, BCI shall not make any disclosures, publication, statement,

or other notices regarding the ability of students who enroll to apply for an emergency need-based grant. Only after such student has signed an enrollment agreement with BCI will BCI provide such student with information regarding the application for an emergency need-based grant.

Eligible students may only receive one emergency need-based grant. BCI will disburse emergency need-based grants to eligible students until the Grant Fund is depleted. BCI intends to begin disbursing emergency need-based grants on or about November 5, 2021 and complete the distribution of such grants in up to a year after processing.

Awarding Procedures

BCI's Director and Financial Director will oversee the awarding of HEERF III financial aid grants. BCI will deposit the Grant Fund in a separate dedicated checking account to be used for the sole purpose of administering the emergency student financial aid grants in accordance with Federal law, published guidance from the U.S. Department of Education, and this plan. BCI will prioritize students with exceptional need, such as students who receive Pell Grants, in awarding financial aid grants to students. However, students do not need to be Title IV eligible to receive grants. Students with an EFC of 0 to 4000 will receive an award for **\$1,200.00**. Students with an EFC of 4001 and above will receive an award for **\$800.00**. In addition, under the CRRSAA and ARP, financial aid grants may be provided to students exclusively enrolled in distance education.

BCI will begin notifying students about the emergency financial aid grants on or about August 30, 2021. BCI will make every reasonable effort to notify all eligible students of the emergency financial aid grant to which they are entitled. Included with this notice will be an attestation statement Exhibit E Form to be completed and signed by the student wherein the student shall acknowledge that the emergency grant funds will be used to cover emergency cost that arise due to the coronavirus (including eligible expenses under a student's cost of attendance, such as tuition, food, housing, health care, and childcare). This notice and acknowledgment statement will be sent to the student's email address on record with BCI. Students will complete the acknowledgment statement and send a signed copy of the statement to BCI.

Disbursement Procedures

BCI will start drawing down funds within 90 days of receiving their respective supplemental HEERF III award notifications. BCI will not draw down funds all at once but only as necessary. Financial aid grants will be disbursed to students within 15 calendar days after drawing down those funds. Also, these funds must be spent no later than a year after processing.

The emergency financial aid grants will be distributed by checks made payable to the students. No grant checks will be disbursed to any otherwise eligible student who fails to or refuses to sign the acknowledgment statement.

Eligible students will have the option on how to receive their grant fund checks. Students may request to pick up their checks at BCI or have the check mailed to them using the address listed on the student's attestation statement.

BCI will provide instructions for those students choosing to pick up their checks at BCI, which will include available pick-up times, as well as safe social distancing requirements.

Accounting & Recordkeeping

BCI's Chief Operating Officer (COO) and Financial Aid Director will be responsible for the administration of the emergency financial aid grants. All disbursements will be overseen by BCI's COO and Financial Aid Director.

BCI's COO and Financial Aid Director are responsible for all accounting and recordkeeping associated with the administration of the student emergency grants. They shall maintain an Excel spreadsheet to track all disbursements by student. BCI's COO shall also be responsible for completing all reports that must be submitted to the U.S. Department of Education as required by the CRRSAA, ARP and any future guidance from the Department.

BCI will comply with section 314(e) of the CRRSAA by reporting the use of funds to the Department no later than 6 months after the date of this award. The institution must also provide a detailed accounting of the use of funds provided by in accordance with the requirements of the Secretary.

BCI will submit an initial report (the "30-day Fund Report") to the Secretary 30 days from the date of the institution's Certification and Agreement to the Department. The Department will provide instructions for providing the required information to the Secretary in the near future. In the meantime, each HEERF III participating institution must post the information listed below on the institution's primary website. The Department would like to receive the most current information from the date when the institution received its allocation for emergency financial aid grants to students. Accordingly, the following information is being provided to comply with the "30-day Fund Report" and will be periodically updated at minimum, every 45 days thereafter.



EXHIBIT E
Student Emergency Financial Aid Grants Attestation Form

Date: _____
Student Name: _____
Current Mailing Address: _____

Phone Number: _____ **EmailAddress:** _____

Emergency funding has been made available to Bennett Career Institute under the American Rescue Plan Act (ARP), 2021. This application permits students to apply for these emergency need-based grants. The BCI administration will determine your eligibility for a grant and the amount for which you will be eligible. Each student will be eligible for only one grant, and only one application will be considered per student. Not every student who applies will necessarily receive an emergency need-based grant.

I certify the following:

- All information provided in this Attestation is true and correct to the best of my knowledge.
- I have applied for Title IV Federal Financial Aid for the purpose of determining need.
- I understand that I must be actively enrolled at BCI.
- I understand that any money awarded from this grant is to be used on any component of the student's cost of attendance or for emergency costs that arise due to the coronavirus, such as tuition, food, housing, course materials, technology, health care (including mental), and childcare.
- I understand that students will be prioritized based on exceptional need, such as students who receive Pell Grants. However, students do not need to be only Pell Grant recipients.
- I understand that financial aid grants may also be provided to students exclusively enrolled in distance learning.

I would like to receive my grant check (choose one):

_____ Pick Up at BCI _____ Mail to my Current Address Above

I understand that if I choose to have my grant check mailed to me, it will be mailed to the address listed above. I will immediately notify the Institute if at any time my address changes. I further understand that if the Institute is unable to locate me and/or distribute any part of my grant award after making reasonable efforts that I will forfeit such funds and that the Institute may use those funds to make additional grants to other students.

Student Signature _____ Date _____

<u>ADMINISTRATIVE USE ONLY</u> Eligible for Title IV Funds? () YES () NO EFC: _____ Administrator's Initials: _____	Award Amount: __ \$ _____ Check #: _____ Date: _____ Student Initials: _____
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OPEID	Grants available for eligible students	# Students eligible to participate	amounts of grants received by eligible students	# Students receiving Grants as of 03/31/2022
03409600	\$134751.00	110	\$33600.00	30