



## Your Questions and Trellis Company's Answers: CARES Act Emergency Aid Funding

On April 7, 2020, Trellis Company hosted a webinar, "[Delivering Emergency Aid Services During COVID-19](#)." Given time restraints, panelists could not address all attendee questions, but Trellis Company gathered your questions and provided answers to help guide your emergency aid programming. Please find the following Department of Education documents released 4/9/20 below:

[Department of Education Cover Letter](#)

[Funding Certification and Agreement](#)

[Department of Education Allocation Amounts](#)

### Student Eligibility

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**Q: Are there restrictions on which students can receive these funds?**

A: According to

<https://www2.ed.gov/about/offices/list/ope/caresheerfcertificationandagreementfinalombapprovedforissuance.pdf>

"Recipient agrees to promptly make available emergency financial aid grants from the advanced funds directly to students for their expenses related to the disruption of campus operations due to coronavirus, such as food, housing, course materials, technology, health care, and child-care expenses. Recipient shall not use the advanced funds to reimburse itself for any costs or expenses, including but not limited to any costs associated with significant changes to the delivery of instruction due to the coronavirus and/or any refunds or other benefits that Recipient previously issued to students."

**Q: Are funds restricted to only FAFSA filers?**

A: This does not appear to be the case based on the bill language and guidance from the Department of Education.

**Q: Are international students and graduate students eligible for emergency funds?**

A: There do not appear to be restrictions on this based on the bill language and guidance from the Department of Education.

**Q: If funds are based on Pell, do students have to be Pell eligible to get funds?**

A: This does not appear to be the case based on the bill language and guidance from the Department of Education.

**Q: If a student maxed out their budget between Pell Grants and federal loans, can they still get emergency funds?**

A: Based on the most recent IFAP guidance, it appears that if the CARES funding is disbursed prior to 6/30/20, it will not be counted as a financial resource.

**Q: Can we fund recent graduates in need, or do they need to be enrolled?**

A: Most likely if they were a student in March 2020, they would be eligible, but additional guidance is needed from the Department of Education.

**Q: Do you require anything from the students, such as commitment to continue at the school or for them to take all of their loans, before getting emergency aid?**

A: This type of packaging philosophy does not appear to be a requirement under the context of the law or guidance from the Department of Education. Trellis does not require this in our emergency aid program but does track student retention.

## How Funds May Be Administered and Disbursed

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**Q: Will funds be disseminated from the financial aid office or are they going through G5?**

A: Per guidance from the Department of Education:

In order to access these funds, all institutions must sign and return the Certificate of Funding and Agreement via grants.gov [here](#), acknowledging the terms and conditions of the funding.

**Q: Which higher education office will administer the funds?**

A: This is not specified in the law or guidance from the Department of Education.

## What the Funds May Cover

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**Q: May the CARE Act funds cover tuition and fees in the form of a scholarship?**

A: According to

<https://www2.ed.gov/about/offices/list/ope/caresheerfcertificationandagreementfinalombapprovedforissuance.pdf>

“Recipient agrees to promptly make available emergency financial aid grants from the advanced funds directly to students for their expenses related to the disruption of campus operations due to coronavirus, such as food, housing, course materials, technology, health care, and child-care expenses. Recipient shall not use the advanced funds to reimburse itself for any costs or expenses, including but not limited to any costs associated with significant changes to the delivery of instruction due to the coronavirus and/or any refunds or other benefits that Recipient previously issued to students.”

**Q: Would refunds to students living in residential housing who left after COVID-19 be considered a reimbursable expense?**

A: According to

<https://www2.ed.gov/about/offices/list/ope/caresheerfcertificationandagreementfinalombapprovedforissuance.pdf>

“Recipient agrees to promptly make available emergency financial aid grants from the advanced funds directly to students for their expenses related to the disruption of campus operations due to coronavirus, such as food, housing, course materials, technology, health care, and child-care expenses. Recipient shall not use the advanced funds to reimburse itself for any costs or expenses, including but not limited to any costs associated with significant changes to the delivery of instruction due to the coronavirus and/or any refunds or other benefits that Recipient previously issued to students.”

**Q: Could these funds be used to reimburse emergency aid already distributed (recently) to students? Is there an effective date?**

A: According to

<https://www2.ed.gov/about/offices/list/ope/caresheerfcertificationandagreementfinalombapprovedforissuance.pdf>

“Recipient agrees to promptly make available emergency financial aid grants from the advanced funds directly to students for their expenses related to the disruption of campus operations due to coronavirus, such as food, housing, course materials, technology, health care, and child-care expenses. Recipient shall not use the advanced funds to reimburse itself for any costs or expenses, including but not limited to any costs associated with significant changes to the delivery of instruction due to the coronavirus and/or any refunds or other benefits that Recipient previously issued to students.”

## Application, Documentation, and Reporting

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**Q: What information should be captured by the student application? Are there sample student applications?**

A: We have uploaded a [sample student application](#) for a program we administer on our website. Note that the sample is a one-page application and was designed to be completed and reviewed quickly. Some of the data elements (such as IPEDS demographic data) is required for our program but may or may not be required for the CARES Act funding. This sample should not be seen as an application for the COVID-19 funds but simply an example of a simple, student application.

**Q: Any suggestions to track applications such as Qualtrics, Excel, and our FAMS?**

A: At this time, we do not have guidance on reporting but should know more once the Department of Education issues guidelines.

**Q: Do schools need to apply for emergency funds?**

A: Per guidance from the Department of Education:

In order to access these funds, all institutions must sign and return the Certificate of Funding and Agreement via grants.gov [here](#), acknowledging the terms and conditions of the funding.

**Q: Will these funds be counted toward COA?**

A: According to [guidance on IFAP](#), the following provision applies through June 30, 2020:

“Any aid (in the form of grants or low-interest loans) received by victims of an emergency from a federal or state entity for the purpose of providing financial relief is not counted as income for calculating a family’s Expected Family Contribution (EFC) under the Federal Methodology or as estimated financial assistance for packaging purposes.”

**Q: Will these funds have to be reported to FISAP?**

A: Reporting guidance is included below:

“Recipient shall promptly comply with Section 18004(e) of the CARES Act and (i) report to the Secretary thirty (30) days from the date of this Certification and Agreement and every forty-five (45) days thereafter in accordance with 2 CFR 200.333 through 2 CFR 200.337, or in such other additional form as the Secretary may specify, how grants were distributed to students, the amount of each grant awarded to each student, how the amount of each grant was calculated, and any instructions or directions given to students about the grants; and (ii) document that Recipient has continued to pay all of

its employees and contractors during the period of any disruptions or closures to the greatest extent practicable, explaining in detail all specific actions and decisions related thereto, in compliance with Section 18006 of the CARES Act”

**Q: Is this aid on students’ T-1098 forms? Could you share specific tax related information?**

A: Guidance from the Department of Education is that, through June 30, 2020:

“Any aid (in the form of grants or low-interest loans) received by victims of an emergency from a federal or state entity for the purpose of providing financial relief is not counted as income for calculating a family’s Expected Family Contribution (EFC) under the Federal Methodology or as estimated financial assistance for packaging purposes.”

Further documentation can be found [here](#).

## General Questions

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**Q: Do campuses already have the emergency funds, and are they able to distribute now?**

A: CARES funding has not yet been distributed, but many campuses do administer their own emergency aid programs.

**Q: Did Congress mean “emergency aid” the way schools think of it, or is just student aid that is delivered based on issues arising from the COVID-19 “national emergency?”**

A: The law defines emergency as: “expenses related to the disruption of campus operations due to coronavirus (including eligible expenses under a student’s cost of attendance, such as food, housing, course materials, technology, health care, and childcare).”

**Q: Are there a few data points about research into emergency aid programs?**

A: The list of reports below summarizes some emergency aid programming at institutions of higher education in the United States.

Kruger, K., Parnell, A., & Wesaw, A. (2016). *NASPA: Landscape analysis of emergency aid programs*. Retrieved from [https://www.naspa.org/images/uploads/main/Emergency\\_Aid\\_Report.pdf](https://www.naspa.org/images/uploads/main/Emergency_Aid_Report.pdf)

Goldrick-Rab, S., & Cady, C. (2017, September). *Distributing emergency aid to college students: Recommendations and sample distribution protocol*. Retrieved from <https://hope4college.com/wp-content/uploads/2018/09/emergency-aid-distribution-sample-protocol.pdf>

Texas Higher Education Coordinating Board [THECB]. (2018). *The Texas emergency aid report: Advocating for emergency aid programs in higher education*. Retrieved from <http://www.60x30tx.com/media/1453/emergency-aid-report.pdf>



**Q: About Trellis Company’s Student Financial Wellness Survey data—was that undergraduates only or graduates and undergraduates?**

A: Undergraduates only.

**Q: Will Trellis offer future guidance as communication is released from the Department of Education? When will we have guidance from the Department of Education?**

A: We expect guidance from the Department of Education soon. To the extent Trellis can provide assistance with the guidance, we will consider doing so.