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USDE COVID-19 Update

Edward Cramp & Kristina Gill
Duane Morris LLP

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Today's webinar

- Student Grant Update
- Institutional Grants Un-Update
- USDE “Flexibility” Update

But first...

The information presented in this webinar is general information for the education of AACCS member schools. It is based on the information available at the time the presentation is given. Circumstances may change quickly, so be sure to keep up to date. Also, this webinar is not legal advice. Duane Morris is the General Counsel to AACCS and is providing this information to you free of charge as an AACCS member. You should consult with your attorney to obtain specific advice for your school.

Student Grant Update

Student Grant Update

- USDE has issued several updates.
- Check IFAP and USDE website for the latest
- USDE notes student grants not taxable income according to IRS
- Last Friday:
 - Clarified that FSA eligibility won't be enforced
 - Response to lawsuit filed against USDE
 - Nothing to be done if you have already disbursed
 - Date your policy; check with your auditor

Institutional Grant Un-Update

Institutional Grants

- Awaiting promised guidance from USDE

USDE “Flexibility” Updates

Distance Education

- Temporary approval flexibility extended to include:
 - Payment periods that overlap March 5, 2020, or
 - That begin on or between March 5, 2020 and Dec 31, 2020

Deadlines Extended by Six Months

- Financial statement and audit deadlines
- Certain compliance information following a change of ownership (accreditor, state, and auditor documents)

Accreditor Visits

- Accreditors permitted to do virtual site visits through Dec 31, 2020
- Must be followed by on-site visit in a "reasonable" timeframe
- On-site visit may be done by a staff member or a trained site visitor
- On-site visit does not need to repeat the full review

HS Grad Verifications

- Until Dec 31, 2020- schools may accept a signed attestation of secondary school completion from applicants
- Schools must still comply with institutional, state, and accreditor requirements

Paycheck Protection Program

- **Composite Score**
 - Schools that received a PPP loan can estimate or use actual amounts of loans forgiven
 - If these amounts are attested to by your auditor, USDE will exclude this amount from total liabilities
- **Federal Work Study**
 - Student workers should not be counted in payroll headcount

Federal Work Student and FSEOG Grants

- Institutional match requirement waive for FWS and FSEOG
- Up to 100% of FWS allocation transferable to FSEOG
- Any amount of FSEOG may be used as emergency grants for students (must follow same rules as CARES Act grants [yay!])

R2T4 Relief

- For any student who withdraws due to COVID-19 issues, who began attendance in a payment period that includes March 13, 2020, institution is not required to return Title IV funds.
- Institutional refund policies and waiver of R2T4 may create significant credit balances- USDE suggests amending refund policy if allowed by accreditor and state
- Must report students who qualifies for relief to USDE
- Work with your T4 servicer and accountant to be sure you do this right

SAP Relief

- Schools can exclude from quantitative component of SAP calculation any attempted credits student could not complete due to COVID-19.
- School must make a reasonable determination that the student did not complete due to COVID-19

Selective Service Registration

- Some flexibility provided to resolve C Code for selective service registration

Data Security

- Schools not relieved of data protection requirements

Any questions?

Edward Cramp

EMCramp@duanemorris.com

619.227.2434 m

619.744.2223 o

Kristina Gill

Kgill@duanemorris.com

202.997.2781 m

202.776.5246 o