

CARES ACT

Higher Education Emergency Relief Fund (HEERF) Distribution Protocol



Inspire Greatness Aveda Institutes has been allocated student grant funds under the CARES Act to provide emergency financial aid grants to students for expenses related to the disruption of campus operations due to coronavirus (including expenses under a student's cost of attendance for food, housing, course materials, technology, health care, and child care).

Aveda Institutes retains discretion to determine the amount of each individual emergency financial aid grant consistent with all applicable laws including non-discrimination laws. Total grant funds will be allocated evenly amongst all eligible students and has been assigned by the Department of Education. All students who were active during the eligibility period outlined below are eligible to receive a grant.

ALLOCATION OF FUNDING

| OPEID | Location | Total Allocation | Student Portion | Student Count | Awarded Evenly |
|----------|----------|------------------|-----------------|---------------|----------------|
| 04167100 | Denver | \$602,184.00 | \$301,092.00 | 292 | \$1,031.14 |
| 04072300 | Provo | \$171,492.00 | \$85,746.00 | 90 | \$952.74 |
| 04194500 | Tucson | \$598,691.00 | \$299,346.00 | 299 | \$1,001.16 |

| | | | | | | % of AZ Cohort (295) |
|----------|---------|--------------|--------------|-----|--------------|----------------------|
| 04194500 | Tucson | \$598,691.00 | \$299,346.00 | 179 | \$179,207.14 | 60% |
| | Phoenix | | | 120 | \$120,138.86 | 40% |

ALLOCATION METHODOLOGY

In considering how funds should be allocated to each student, we have determined that all students have incurred costs and expenses associated with the COVID-19 pandemic. The amount of those costs is roughly equal to the per capita distribution of the student grant funds across each campus, based on the number of eligible students at each location. We have considered whether to require each student to prove an individualized demonstration of need prior to grant disbursement. However, we believe that the time required to conduct such an individualized assessment would be substantial and would cause a significant delay in the delivery of the grants. Given the urgent need among our students for these funds, we have prioritized expediting distribution to the students. With approximately 700 students companywide, our goal is to prevent delays associated with assessing individual student need and instead deliver the funds to students more quickly.

DISTRIBUTION OF GRANTS

Each eligible student and will receive a one-time stipend based on location. The following lists the amounts by location:

| Location | \$ per Student |
|----------|----------------|
| Denver | \$1,031.14 |
| Tucson | \$1,001.16 |
| Provo | \$952.74 |
| Phoenix | \$1,001.16 |

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DATE OF DETERMINATION - The student must have been actively enrolled in school during the period of temporary distance education between 3/18/2020 and 5/18/2020, including those students who are currently on a leave of absence, those who completed their program and excluding students who dropped from their program during this same date range.

REPORTING

Documentation for detailed disbursements will be submitted to the Department of Education within 30 days of receipt of the funds and subsequently 45 days thereafter.

Disbursements will be credited to the student's ledger but will not affect the student's tuition balance. Funds may not be used to pay a tuition balance.

POLICY ON STUDENT USE OF FUNDS

- Students may not use the grant funds to pay tuition balances.
- Students may not be asked to use the grant funds to pay for educational supplies.
- Grant funds are to be used for expenses related to the disruption of campus operations due to coronavirus, such as food, housing, course materials, technology, health care or childcare.
- Each student must sign an acknowledgement that he/she accepted and received the grant funds and that it will be used for its intended purpose.
- Admissions personnel will be instructed that they may not discuss eligibility for CARES Act grants with prospective students. CARES Act grants may not be offered to or discussed with prospective students as an incentive to enroll.

DISBURSEMENT METHOD + STUDENT ACKNOWLEDGEMENT

Checks will be cut for each student and shipped to the location. Each Institute will publish a Grant Pick Up Day where necessary physical distancing safeguards will be in place. Students will sign the acknowledgement prior to receiving the check, certifying that they will use the funds for the intended purpose of assisting with COVID-19 related expenses.

STAFFING DURING PANDEMIC

To the greatest extent practicable, we are keeping employees on staff. We currently have 13 team members that are on leave and 88 active team members.



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UPDATED 6.12.20

Grant checks were issued to all 676 eligible students on 6/1 and 6/2 and were provided to each Campus for distribution on 6/4 and 6/5. All eligible students were notified of their eligibility via email on 6/8/2020, this also included notification of the grant pickup dates for each campus which occurred between 6/9 - 6/12/20 and a copy of the Distribution Policy. In order to receive their check each eligible student was required to sign the student acknowledgement form (posted below). As of Friday, 6/12 the following checks were distributed and remaining to be picked up on each campus:

| OPEID | Location | Total Checks Issued | Checks Distributed | Checks Remaining | Checks Cleared |
|----------|----------|---------------------|--------------------|------------------|----------------|
| 04167100 | Denver | 292 | 225 | 1 | 67 |
| 04072300 | Provo | 90 | 76 | - | 14 |
| 04194500 | Tucson | 179 | 145 | - | 34 |
| | Phoenix | 120 | 103 | - | 17 |

UPDATED 9.15.20

| OPEID | Location | Total Checks Issued | Checks Distributed | Checks Remaining | Checks Cleared | Checks Outstanding |
|----------|----------|---------------------|--------------------|------------------|----------------|--------------------|
| 04167100 | Denver | 292 | 291 | 1 | 284 | 8 |
| 04072300 | Provo | 90 | 90 | - | 90 | - |
| 04194500 | Tucson | 179 | 179 | - | 178 | 1 |
| | Phoenix | 120 | 120 | - | 119 | 1 |

UPDATED 12.31.20

| OPEID | Location | Total Checks Issued | Checks Distributed | Checks Remaining | Checks Cleared | Checks Outstanding |
|----------|----------|---------------------|--------------------|------------------|----------------|--------------------|
| 04167100 | Denver | 292 | 291 | 1 | 289 | 3 |
| 04072300 | Provo | 90 | 90 | - | 90 | - |
| 04194500 | Tucson | 179 | 179 | - | 179 | - |
| | Phoenix | 120 | 120 | - | 119 | 1 |

UPDATED 3.31.21

| OPEID | Location | Total Checks Issued | Checks Distributed | Checks Remaining | Checks Cleared | Checks Outstanding |
|----------|----------|---------------------|--------------------|------------------|----------------|--------------------|
| 04167100 | Denver | 292 | 291 | 1 | 290 | 2 |
| 04072300 | Provo | 90 | 90 | - | 90 | - |
| 04194500 | Tucson | 179 | 179 | - | 179 | - |
| | Phoenix | 120 | 120 | - | 119 | 1 |

*funds from uncleared/outstanding checks as of 4/16/2021 will be reallocated to grants under HEERF II

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Higher Education Emergency Relief Fund Student Acknowledgement



Inspire Greatness Aveda Institutes has been allocated grant funds under the CARES Act to provide emergency financial aid grants to students for expenses related to the disruption of campus operations due to Coronavirus (including expenses under a student's cost of attendance for food, housing, course materials, technology, health care, and child care).

The school has been given discretion to determine the amount of each individual emergency financial aid grant consistent with all applicable laws including non-discrimination laws. Inspire Greatness Aveda Institutes are adopting a policy that total grant funds will be allocated evenly amongst students that attended class between the date the school closed and the date the institution received the student grant funds. Students will receive a one-time stipend.

CAMPUS: _____

STUDENT: _____

AMOUNT OF DISBURSEMENT: _____

STUDENT ACKNOWLEDGMENT: _____

I understand that I am receiving a onetime relief fund stipend in the amount of \$_____. These funds are to be used for any expenses related to the disruption of campus operations due to COVID-19 including expenses related to food, housing, course materials, technology, health care or child care.

STUDENT SIGNATURE

DATE

ADMINISTRATION SIGNATURE

DATE