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Amended Policies based on Department Guidance for interruptions of study related to Coronavirus (COVID-19) (Updated June 16, 2020; October 19, 2020)

A. Distance Education

Capri is following the expanded, broad approval for the use of distance education as provided in the April 3, 2020, EA to include payment periods that overlap March 5, 2020, or that begin on or between March 5, 2020, and December 31, 2020.

B. Leave of Absence (LOA) expires December 31, 2020.

Capri adopted a Temporary Leave of Absence (LOA) policy, approved by NACCAS which includes the requirement of reason for the student's request.

For all leaves of absence granted as the result of COVID-19 related circumstances, Capri may approve, and students may begin, a leave of absence prior to submitting a written request for a Leave (LOA requests must be obtained subsequently). In some instances (example: student not being able to move forward without further in person practical instruction or testing) Capri may decide to suspend the program on a temporary basis placing all students on approved LOAs. Capri would then solicit LOA requests from those students.

The Leave of Absents begins the first day after the student's last date of attendance. The end date will be calculated on a case by case basis. No absent hours or fees will accumulate as a result of an approved LOA. An Enrollment Agreement Addendum will be signed by the student and a school official extending the Contract Graduation Date for days missed during the LOA based on the students' schedule. The 1500 State required hours for Program completion remains unchanged.

Electronic signatures will be obtained via DocuSign when wet signatures are not available.

C. R2T4- COVID 19

[Updated as of 06/16/2020] Section 3508 of the CARES Act directs the Secretary to waive the statutory requirement for institutions to return Title IV funds as the result of student withdrawals related to a qualifying emergency. For any student who begins attendance in a payment period or period of enrollment that includes March 13, 2020, or begins between March 13 and the later of December 31 or the last date that the national emergency is in effect, and subsequently withdraws from the period as a result of COVID-19-related circumstances, an institution is not required to return Title IV funds.

This includes students who withdrew during the applicable period for whom the institution has already performed an R2T4 calculation and returned funds. Where returns have already been made, the Capri should re-disburse Title IV funds to those students, making required adjustments in COD, crediting students' ledger accounts, and requesting any necessary funds from G5. In the case of withdrawn students for whom no returns have been made, the institution should:

1. Perform an R2T4 calculation in order to determine the amount of Title IV funds that would otherwise have to be returned;
2. Make no adjustments to COD as a result of the withdrawal;
3. Make no adjustments (as the result of the withdrawal) to the amount of Title IV aid credited to the student's ledger account.

If an affected student withdraws prior to some or all her Title IV aid having been disbursed (a situation that would normally result in a post-withdrawal disbursement), the Capri should proceed with making any remaining disbursements for the payment period, and then follow steps one through three above. To determine whether a student has withdrawn from a payment period or period of enrollment, please refer to 34 CFR 668.22.

The CARES Act also directs the Secretary to waive student grant overpayments that result from the R2T4 process for students who withdraw as a result of COVID-19-related circumstances.

If a student's grant overpayment has been waived in accordance with this provision, Capri is not required to notify the student or the National Student Loan Data System (NSLDS) of the overpayment or refer any portion of the overpayment to the Department. In addition, Capri will not apply any Title IV credit balance to pay down the grant overpayment. Capri will document in the student's file when it applies this waiver as a result of the CARES Act. If funds were already returned the amount of a student overpayment on behalf of a student, it should re-request those funds in the same manner as described above for Title IV funds that the institution was otherwise required to return under normal R2T4 requirements.

Qualification for R2T4 Relief

Capri will apply the R2T4 Waiver Relief to all students that meet the definition of "Qualification" which states: *An institution that moves students from ground-based instruction to distance learning, closed campus housing or other campus facilities, or experienced other interruptions in instruction during a term within the covered period may consider all withdrawals from students enrolled in affected programs during that term to have been the result of circumstances related to the COVID-19 national emergency.*

Procedure:

1. Waiver applies when there is a disruption to delivery of education, COVID 19 related/or student documented reason related to the virus
2. Applies for Withdrawals included in March 13 payment period-December 31 or the last date that the national emergency is in effect
3. Perform R2T4
4. Do not return funds
5. Pay full amount of funds that could have been disbursed
6. Do not adjust student ledger
7. Do not make adjustments to COD
8. Credit balance is paid to student

Reporting Requirements

- a. Identify information for each student for whom R2T4 was waived
- b. Amount of Title IV grant or loan assistance for each student
- c. The total amount of Title IV grant or loan assistance that each institution has not returned as a result of the CARES Act

Upon receipt of the information, ED will adjust the student's Pell lifetime eligibility and loan subsidized usage requirements, and loan obligations

D. Satisfactory Progress

Section 3509 of the CARES Act allows institutions to exclude from the quantitative component (pace measurement) of satisfactory academic progress (SAP) attempted credits a student was unable to complete as a result of the COVID-19 national emergency.

It is not necessary for a student to have filed an SAP appeal. However, to exclude attempted credits from SAP, Capri must have reasonably determined that the student's failure to complete those credits was the result of a COVID-19 related circumstance.

- Allowable circumstances include, but are not limited to,
- illness of the student or family member
- need to become a caregiver or first responder
- economic hardship
- added work hours
- loss of childcare
- inability to continue with classes via distance education
- inability to access wi-fi due to closed facilities

If Capri temporarily ceases operations during a period of enrollment, attempted credits for all affected students (specific to that enrollment period) may be excluded.

Regarding the effect of excluding attempted credits on maximum timeframe, SAP regulations require that the pace at which students progresses through the program ensures completion of that program within the maximum timeframe.

For example, the pace of a student who has completed 339 of 450 attempted hours is 75 percent (339/450), below what is necessary to be making SAP. However, if 30 hours attempted were unable to complete in spring of 2020 are excluded due to a COVID-19 related circumstance, the pace becomes 80 percent (339/420) and he or she is making SAP. The 30 hours are effectively excluded from the maximum timeframe as well as the measurement of pace.

E. Coronavirus and the Impact on Absent Hours

It is the policy of the College for a student to refrain from attending class when sick with the common cold, influenza, Coronavirus or any other infectious illness. The student should stay home and consult with their healthcare provider for evaluation. As such, the College accommodates each student with 75 absent hours for personal use at no additional charge. Below are examples specific cases that may amend this policy:

When the Student is:

- *Confirmed positive for COVID-19 by testing, lives with or cares for a person confirmed positive for COVID-19 by testing:*
The student will be placed on a temporary Leave of Absence as identified in section B of this Policy.
- *Identified as a "Close Contact" by the CDC, a COVID-19 POC or during self-reporting by the student:*
The student will be placed on a temporary Leave of Absence as identified in section B of this Policy.
- *Student(s) displays signs of infectious illness consistent with COVID-19:*
The student should report an absence, stay home, consult with their health care provider for evaluation and seek a COVID-19 test. If the test is Negative: the student should provide documentation of testing to a COVID-19 POC which must include the student's full Name and the Date of the Test. If provided, an Overtime Charge Accommodation will be made excluding the Date of the Test, according to the student's schedule, from the calculation of overtime charges.

FOOTNOTES

Close Contact by CDC definition is as follows: student was within 6 feet of someone who has COVID-19 for at least 15 minutes, provided care at home to someone who is sick with COVID-19, had direct physical contact with the person touched, hugged, or kissed them, shared eating or drinking utensils, the confirmed case sneezed, coughed, or somehow got respiratory droplets on the student.

COVID-19 POC is the designated point of contact (a staff person that is responsible for responding to COVID-19 concerns and intake documents).