

## Memorandum

To: Campus Financial Aid Administrators

From: Meghan Flores  
Minnesota Office of Higher Education  
Manager, State Financial Aid Programs

Subject: **2020-2021 COVID-19 State Financial Aid Guidance**

Date: September 17, 2020, **Additional Guidance Issued, October 28, 2020**

### Overview:

Under Article 2, Section 13 of [Minnesota Laws 2020 Regular Session, Chapter 71](#), the Minnesota legislature has granted temporary and limited authority to modify and waive portions of statutes and rules that affect our state financial aid programs. The authority under the section referenced above expires the later of December 31, 2020, or 60 days after the end of a peacetime public health emergency declared before December 31, 2020.

### Maintain Residency

If the only way a student can meet a MN residency requirement is by graduating from a MN high school while residing in MN and the student now resides in another state, traditionally the student must physically attend a MN college or university. **COVID-19 Exception:** Due to the impacts of COVID-19, on ground courses at Minnesota schools that are converted to be offered via a distance education format will meet the requirement of physically attending. Please note this is different than a student who is enrolled in an online *program* that was offered as an online program prior to the pandemic and will be after; a student in this situation who does not reside in Minnesota is not a resident for state financial aid purposes.

**Scope:** From 3/13/2020 through terms started prior to 7/1/2020. **This provision has been extended to include terms that began after 7/1/2020 and will extend through the later of December 31, 2020, or 60 days after the end of a peacetime public health emergency declared before December 31, 2020.**

### Tuition Reciprocity with Wisconsin

Students taking distance education from a college in a neighboring reciprocity state while remaining in their home state are not covered under the reciprocity agreement with Wisconsin. **COVID-19 Exception:** Due to the impacts of COVID-19, on ground courses at Minnesota and Wisconsin schools may be converted to be offered via a distance education

format. This coursework will not be considered "distance learning" courses and will be covered under the Minnesota-Wisconsin Reciprocity Agreement.

**Scope:** From 3/13/2020 through terms started prior to 7/1/2020. **This provision has been extended to include the 2020-2021 academic year.**

## Unit Restoration

Students who withdraw from enrollment during the peacetime public health emergency known as COVID-19 may be eligible to have grant eligibility from the term of withdrawal reinstated for State Grant, Postsecondary Child Care Grant and Indian Scholarship programs. Similar to the full withdraw due to medical reasons while under the care of a physician that impacted a student's ability to complete the term, the documentation needs to be collected and reviewed by OHE in order for units to be restored.

**Scope:** For students who completely withdraw due to the impact of COVID-19 for terms that were in progress as of 3/13/2020 or for terms that began after 3/13/2020, but prior to 7/1/2020. **This provision has been extended to include terms that began after 7/1/2020 and will extend through the later of December 31, 2020, or 60 days after the end of a peacetime public health emergency declared before December 31, 2020.**

### Aid Administrator Steps to Request COVID-19 Unit Restoration:

1. School determines if term of full withdraw was within the scope of the COVID-19 State Financial Aid Guidance. If yes, the school then collects a student statement explaining how the full withdrawal was connected to COVID-19 and disrupted the student's studies to the point of full withdrawal. Supplemental documentation from a third party may be included.
2. School sends student statement along with a transcript (school copy is fine) to OHE and indicates which program(s) the restoration is for (State Grant, Child Care Grant, MISP). OHE will review the transcript to ensure the withdrawal falls within the scope. It must be a full withdrawal and for terms that were in progress 3/13/2020 or began after 3/13/2020, but prior to 7/1/2020, OR **terms that began after 7/1/2020 through the later of December 31, 2020, or 60 days after the end of a peacetime public health emergency declared before December 31, 2020.**
3. OHE will review the student statement and transcript; the statement must state that the reason for withdrawal and how it was related to the global pandemic known as COVID-19.
4. If the statement and transcript warrant the unit restoration, OHE staff will remove units from our internal database(s); once this is complete, school administrators will see the resulting change via SG Student Web Access Screen.

Note: Due to the widespread impact of COVID-19, the reasons for withdrawal will be broad and are not limited to the student or a student's family member being ill from the virus. Reasons are not limited to: job loss, lay off, furlough or reduction of hours for student or parent(s), loss of childcare, needing to work additional hours to support self or family, inability to match class

hours with work hours/childcare availability, illness of student or family member, homelessness or housing insecurity, transportation challenges because of COVID-19, etc.

## Minnesota State Work Study

The State Work Study program does not have any restrictions regarding teleworking or remote working. OHE is supportive of schools that make adjustments for their student staff, as they have for permanent staff, where appropriate.

Administrative rule 4830.2400, Subpart 3, states in part, “not less than 25 percent of the amount earned by a student shall be paid by the employer”. Under the limited and temporary authority, the Office of Higher Education will suspend administrative rule 4830.2400, Subpart 3.

**Scope:** This means that the **employer match is not required for terms that begin on or after 7/1/2020 and will extend through the later of December 31, 2020, or 60 days after the end of a peacetime public health emergency declared before December 31, 2020.**

## Additional COVID-19 State Financial Aid Guidance Issued 10/27/2020

In addition to the 2020-2021 COVID-19 State Financial Aid Guidance detailed above, the Office of Higher Education is applying the temporary and limited authority granted to issue guidance on two additional COVID-19 flexibilities for State Financial Aid programs. Please note that as of the date of this memo, the current COVID-19 Peacetime Emergency declaration has been extended through November 12, 2020. Therefore, “the 60 days after” clause in the temporary authority will now be in effect. The COVID-19 Peacetime Emergency may be further extended by executive order under Governor Walz on or before November 12, 2020.

## Minnesota State Work Study flexibility

Students can be paid Minnesota Work Study funds if they are unable to work due to a qualifying COVID-19 related disruption that occurs during the covered period. For State Work Study the covered period includes terms that begin on or after 7/1/2020 through 60 days after the end of the peacetime public health emergency.

A qualifying COVID-related disruption for State Work Study purposes is:

- The campus closes or temporarily ceases instruction;
- The campus moves classes from ground-based to online;
- The student is employed by an employer that temporarily or permanently closes;
- The student is quarantined and unable to travel to campus or the jobsite; or
- Other such disruptions due to COVID-19.

Paying Minnesota Work Study Funds when unable to work due to COVID-19:

- This is a choice for the school; the school must still spend State Work Study funds within their campus allocation.

- Schools may only choose this option if all of the following conditions are met:
  - The student was enrolled at an eligible institution and received a State Work Study award for the covered period during which the qualifying COVID-19 related disruption occurred (see bulleted list above);
  - The student had already begun working and earning funds in a State Work Study job during the covered period before the COVID-19 related disruption occurred; **and**
  - The student was prevented from fulfilling their State Work Study obligation for all or part of the covered period due to the qualifying COVID-19 related disruption.

### **Required Tracking and Year-End COVID-19 Reporting for 2020-2021 State Financial Aid Programs:**

Similar to guidance issued last spring, OHE will require schools to track and report aggregate data when the school chooses to apply State Financial Aid COVID-19 flexibilities. On a per program basis, schools must create a process to track the number of students and dollar amount of the impact of the temporary program modifications. OHE will provide a year-end report template. Schools may choose to add tabs to that year-end report template in order to track utilization of the State Financial Aid COVID-19 flexibilities they apply on campus.

**Scope:** This provision is applicable **for terms that begin on or after 7/1/2020 and the provision will extend through 60 days after the end of the peacetime public health emergency. PLEASE NOTE: This scope of this provision varies slightly from the Federal Work Study COVID-19 provision in that the federal provision covers the entire 2020-2021 academic year.** As long as it falls into the scope detailed above, schools are able to apply this provision to appropriate situations that occurred prior to the release of this updated guidance.

### **OHE Refund Calculation Spreadsheet when School Chooses to Apply R2T4 Waiver**

If a school chooses to apply the R2T4 waiver provision, where the school nor the student have to return funds if the student had a COVID-19 related withdrawal, there are implications for the state return of funds calculation performed via the OHE Refund Calculation Spreadsheet.

- If the school administrator gets to step C of the OHE Refund Calculation Spreadsheet and receives the “STOP, No Refund!” message, there is nothing further the administrator needs to do. The student does not need to be included on the year-end COVID-19 required report to OHE.
- In cases where the administrator is to proceed to step D of the OHE Refund Calculation Spreadsheet, the administrator should still list the calculated amount of the Title IV refund from Step 5, Box O of the R2T4 Worksheet.

- If step E indicates there is a net refund due to OHE and the administrator is instructed to complete Part III of the spreadsheet, the proportional share refund to OHE is not required for:
  - State Grant (including funds paid via the Minnesota Dream Act)
  - Grants for Students with Intellectual and Developmental Disabilities,
  - MN Reconnect,
  - Postsecondary Child Care Grants,
  - Indian Scholarships and
  - Teacher Candidate Grants.
- If Part III indicates a return is due for the SELF Loan program, the return must still be completed. However, if the return will cause a hardship for the student, the school administrator may contact the Marilyn Kosir, SELF Manager to discuss the individual student situation and an exception to the required return may be granted. Marilyn's contact information is (651) 355-0600 or [Marilyn.kosir@state.mn.us](mailto:Marilyn.kosir@state.mn.us).

Please note, the changes above **only apply if** the school has chosen to apply the R2T4 waiver; there are no changes to the standard calculations in situations where the school does not apply the R2T4 waiver.

### **Required Tracking and Year-End COVID-19 Reporting for 2020-2021 State Financial Aid Programs:**

OHE will require schools to track and report aggregate data when the school chooses to apply State Financial Aid COVID-19 flexibilities. On a per program basis, schools must create a process to track the number of students and dollar amount of the impact of the temporary program modifications. OHE will provide a year-end report template.

**Scope:** This provision is applicable **for terms that begin on or after 7/1/2020 and the provision will extend through 60 days after the end of the peacetime public health emergency.** As long as it falls into the scope detailed above, schools are able to apply this provision to appropriate situations that occurred prior to the release of this updated guidance.

### **Questions**

If you have questions or concerns, I encourage you to contact me.

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