



Higher Education Emergency Relief Funds Comparison Chart

March 2021

Any updates to this chart made after the initial publication on March 15, 2021 will appear in red text.

Item	HEERF I Funds The Coronavirus Aid, Relief, and Economic Security Act (CARES Act)	HEERF II Funds The Coronavirus Response and Relief Supplemental Appropriations Act (CRRSA Act)	HEERF III Funds The American Rescue Plan (ARP)
Total HEERF Funding Amount	\$14 billion	\$23 billion	\$40 billion
Required Student Spending	<ul style="list-style-type: none"> 50% of an institution's allotment must go to emergency financial aid grants to students 	<ul style="list-style-type: none"> Requires institutions to spend the same dollar amount on student grants as they were required to spend under the CARES Act For-profits must use 100% of their allotment on student grants 	<ul style="list-style-type: none"> At least 50% of an institution's total allotment must go to student grants For-profits must use 100% of their allotment on student grants
Allocation Formula	<ul style="list-style-type: none"> 75% on the enrollment of full-time equivalent (FTE) Pell Grant recipients 25% on enrollment of FTE non-Pell Grant recipients Students who were enrolled exclusively in online, distance education courses prior to the COVID-19 emergency were excluded from this calculation 	<ul style="list-style-type: none"> 37.5% on FTE enrollment of Pell Grant recipients who were not enrolled exclusively in distance education courses prior to the qualifying emergency 37.5% on headcount enrollment of Pell recipients who were not enrolled exclusively in distance education courses prior to the qualifying emergency 11.5% on FTE enrollment of non-Pell recipients who were not enrolled exclusively in distance education courses prior to the qualifying emergency 11.5% on headcount enrollment of non-Pell recipients who were not enrolled exclusively in distance education courses prior to the qualifying emergency 1% based on FTE enrollment of Pell recipients who were exclusively enrolled in distance education course prior to the qualifying emergency 1% based on headcount of Pell recipients who were exclusively enrolled in distance education courses prior to the qualifying emergency 	<ul style="list-style-type: none"> 37.5% on FTE enrollment of Pell Grant recipients who were not enrolled exclusively in distance education courses prior to the qualifying emergency 37.5% on headcount enrollment of Pell recipients who were not enrolled exclusively in distance education courses prior to the qualifying emergency 11.5% on FTE enrollment of non-Pell recipients who were not enrolled exclusively in distance education courses prior to the qualifying emergency 11.5% on headcount enrollment of non-Pell recipients who were not enrolled exclusively in distance education courses prior to the qualifying emergency 1% based on FTE enrollment of Pell recipients who were exclusively enrolled in distance education course prior to the qualifying emergency 1% based on headcount of Pell recipients who were exclusively enrolled in distance education courses prior to the qualifying emergency

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Funding Breakdown	<ul style="list-style-type: none"> ● \$1 billion to minority-serving institutions ● \$350 million to help colleges most affected by the crisis 	<ul style="list-style-type: none"> ● \$1.7 billion to minority-serving institutions ● \$113.5 million for institutions with the greatest unmet need related to the pandemic through FIPSE ● \$681 million for for-profit institutions (funds must only be used on student grants - for-profit institutions were not eligible for (a)(1) pot of funds) 	<ul style="list-style-type: none"> ● \$36 billion for public and private non-profits ● \$3 billion for MSI ● \$198 million unmet need ● \$396 million for for-profit institutions (funds must only be used on student grants)
Requirement to Prioritize Need	<ul style="list-style-type: none"> ● Not required by law, but ED guidance encouraged institutions to prioritize students with the greatest need 	<ul style="list-style-type: none"> ● Yes 	<ul style="list-style-type: none"> ● Yes
Student Portion Allowable Uses	<ul style="list-style-type: none"> ● Funds must go directly to students in the form of emergency financial aid grants for expenses related to the disruption of campus operations due to coronavirus ● Can be used for eligible COA expenses such as food, housing, course materials, technology, health care, and childcare 	<ul style="list-style-type: none"> ● Any component of student's cost of attendance ● Emergency costs that arise due to coronavirus, such as: tuition; food; housing; health care (including mental); childcare 	<ul style="list-style-type: none"> ● Any component of student's cost of attendance ● Emergency costs that arise due to coronavirus, such as: tuition; food; housing; health care (including mental); childcare
Institutional Portion Allowable Uses	<ul style="list-style-type: none"> ● Defray expenses due to significant changes to the delivery of instruction due to the coronavirus ● Make additional financial aid grants to students 	<ul style="list-style-type: none"> ● Defray expenses associated with coronavirus including: <ul style="list-style-type: none"> ○ Lost revenue ○ Reimbursement for expenses already incurred ○ Technology costs associated with a transition to distance Education ○ Faculty and staff trainings ○ Payroll ● Carry out student support activities authorized by the HEA that address needs related to coronavirus ● Make additional financial aid grants to students 	<ul style="list-style-type: none"> ● Defray expenses associated with coronavirus including: <ul style="list-style-type: none"> ○ Lost revenue ○ Reimbursement for expenses already incurred ○ Technology costs associated with a transition to distance education ○ Faculty and staff trainings ○ Payroll ● Make additional financial aid grants to students

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Institutional Portion Allowable Uses (continued)			<ul style="list-style-type: none"> ● Institutions must use a portion of their allocation for: <ul style="list-style-type: none"> ○ Implementing evidence-based practices to monitor and suppress coronavirus in accordance with public health guidelines; and ○ Conduct direct outreach to financial aid applicants about the opportunity to receive a financial aid adjustment due to the recent unemployment of a family member or independent student, or other circumstances
Student Eligibility	<ul style="list-style-type: none"> ● No student eligibility requirements in the law, but ED guidance was that students must meet Title IV eligibility requirements in order to receive HEERF emergency grants ● DACA students, undocumented students and international students prohibited by ED guidance ● Online students who were enrolled exclusively in online programs on March 13th are not eligible per the law 	<ul style="list-style-type: none"> ● No student eligibility requirements in the law ● Non-degree seeking, non-credit, dual enrollment, and continuing education students eligible per ED guidance ● Students exclusively enrolled in distance education may receive these funds ● ED has not issued written guidance to clarify whether or not undocumented, DACA, or international students may receive these funds 	<ul style="list-style-type: none"> ● No student eligibility requirements in the law ● Non-degree seeking, non-credit, dual enrollment, and continuing education students eligible per ED guidance ● Students exclusively enrolled in distance education may receive these funds ● ED has not issued written guidance to clarify whether or not undocumented, DACA, or international students may receive these funds
December 27 th Rule	<ul style="list-style-type: none"> ● Unspent institutional HEERF I funds as of December 27, 2020 can be used in the same way as the allowable uses of the supplemental CRSSA (HEERF II) Institutional Portion funds ● Unspent student HEERF I funds as of December 27, 2020 can be used to provide financial aid grants in the same way as the allowable uses of the HEERF II student funds ● leftover HEERF I funds, HEERF II funds, and HEERF III funds can be used to cover such allowable costs incurred on 	<ul style="list-style-type: none"> ● leftover HEERF I funds unspent as of December 27, 2020, HEERF II funds, and HEERF III funds can be used to make student grants to cover any component of the student’s COA or for emergency costs that arise due to Coronavirus, such as tuition, food, housing, health care (including mental health care), or child care. ● The allowable costs do not have to be related to the disruption of campus operations due to Coronavirus. ● leftover HEERF I funds, HEERF II funds, and HEERF III funds can be used to cover such 	<ul style="list-style-type: none"> ● leftover HEERF I funds unspent as of December 27, 2020, HEERF II funds, and HEERF III funds can be used to make student grants to cover any component of the student’s COA or for emergency costs that arise due to Coronavirus, such as tuition, food, housing, health care (including mental health care), or child care. ● The allowable costs do not have to be related to the disruption of campus operations due to Coronavirus. ● leftover HEERF I funds, HEERF II funds,

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	<p>or after March 13, 2020 and before December 27, 2020 in situations where the institution is releasing the grant funds directly to the student.</p> <ul style="list-style-type: none"> Institutions may use unspent funds effective December 27, 2020 for costs incurred on or after March 13, 2020 	<p>allowable costs incurred on or after March 13, 2020 and before December 27, 2020 in situations where the institution is releasing the grant funds directly to the student.</p> <ul style="list-style-type: none"> Institutions may use unspent funds effective December 27, 2020 for costs incurred on or after March 13, 2020 	<p>and HEERF III funds can be used to cover such allowable costs incurred on or after March 13, 2020 and before December 27, 2020 in situations where the institution is releasing the grant funds directly to the student.</p> <ul style="list-style-type: none"> Institutions may use unspent funds effective December 27, 2020 for costs incurred on or after March 13, 2020
Endowment Implications	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> Institutions subject to the endowment excise tax had their allocations reduced by 50% and are required to spend those funds only on student emergency grants, or for sanitation, personal protective equipment (PPE), or other expenses associated with the general health and safety of the campus environment 	<ul style="list-style-type: none"> Institutions subject to the endowment excise tax would not be subject to restrictions on amount of allocations or uses of funds applicable to previous HEERF
Application Required to Receive Funds?	<ul style="list-style-type: none"> Institutions must sign the Funding Certification and Agreement for Emergency Grants for both the student and institutional portions of funding 	<ul style="list-style-type: none"> Institutions who received funds under the CARES Act do not need to complete any application or forms to receive their allocation Institutions that did not receive either or both of the institutional share and student share of CARES Act funds will need to submit applications following the CARES Act process to receive supplemental allocations 	<ul style="list-style-type: none"> Specific requirements related to the application process for these funds have not been released yet
Reporting Requirements	<ul style="list-style-type: none"> Institutions must report publicly on their primary websites on a quarterly basis for both student portion and institutional portion funds Institutions are required to submit an annual report to the Department by February 8, 2021 covering CARES Act HEERF grant expenditures in calendar year 2020 	<ul style="list-style-type: none"> Specific requirements for reporting of these funds have not been released yet The CRRSA language around reporting reads: "Recipient must promptly and timely report to the Department on the use of funds no later than 6 months after the date of this award in a manner to be specified by the Secretary pursuant to section 314(e) of the CRRSAA. Recipient must also promptly and timely provide a detailed accounting of the 	<ul style="list-style-type: none"> Specific requirements related to the reporting of these funds have not been released yet

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		use of funds provided by this award in such manner and with such subsequent frequency as the Secretary may require. Recipient acknowledges the Department may require additional or more frequent reporting to be specified by the Secretary.”	
Deadline to Spend Funds	<ul style="list-style-type: none"> All institutions have one calendar year from the date of award in their HEERF Grant Award Notification (GAN) to complete the performance of their HEERF grant 	<ul style="list-style-type: none"> An institution has one year from the date the school's supplemental grant was processed to distribute the HEERF II funds 	<ul style="list-style-type: none"> Specific requirements related to the spending deadline for these funds have not been released yet
Counted as EFA, taxable income, untaxed income?	<ul style="list-style-type: none"> No 	<ul style="list-style-type: none"> No 	<ul style="list-style-type: none"> No