COVID-19 and Federal Student Aid: HEERFs

May 21, 2021
Webinar Housekeeping – Welcome!

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Your Webinar X Presenters

- Justin Draeger
- David Futrell
- Karen McCarthy
- Jill Desjean
Agenda

- Where We Are Now
- State of Emergency
- Reporting
- Requirements for Institutions
- Allocations & Applications
- Student Eligibility
- Packaging of HEERF
- Questions

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Will you award your HEERF III emergency grants to institutionally-identified students (block grants), by application, or both?

- Block Grants
- Application
- Both
- Undecided
- I Don't Know

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Poll Results
How quickly does your institution anticipate spending the bulk of your HEERF III allocation?

- Within one month of receiving funds
- Within three months of receiving funds
- Within six months of receiving funds
- We will be spending the money over the course of the next 12 months

Poll Results

By the Numbers

- $77 billion: Total amount of emergency funds for students/institutions
  - $31 billion: Total amount specifically allocated for student grants
    - $29 billion: Total annual amount we spend on the Federal Pell Grant
- 3: Number of COVID relief bills
  - 92: The number of Senators who supported the December COVID relief bill
  - 0: The number of Republican Senators and Representatives who supported the March 2021 American Rescue Plan
By the Numbers

- **45 million**: The estimated number of borrowers who will need to resume repayment on October 1
- <10%: The odds of another COVID relief bill on the horizon
  - **50/50**: The odds of significant additional student aid funding through appropriations or budget reconciliation

State of Emergency

- **National Emergency vs Public Health Emergency**
  - National Emergency until March 1, 2022
    - Could be ended early by the President
  - Public Health Emergency
    - Renewed April 21, 2021, renewal determined every 3 months
- Most waivers and flexibilities active until the end of the payment period following the payment period during which the National Emergency is ended
- See chart attached to January 15, 2021 Electronic Announcement for several exceptions

HEERF III Institutional Requirements
Monitor and Suppress COVID-19

- Institutions must spend a portion of their institutional HEERF share to implement evidence-based practices to monitor and suppress coronavirus in accordance with public health guidelines
- Examples:
  - Testing
  - Prevention
  - Reducing Barriers to Vaccination
  - Supporting Students
- Not the financial aid office’s responsibility, but must be done

Direct Outreach

- Institutions must spend a portion of their institutional HEERF III share to conduct direct outreach to financial aid applicants and current aid recipients about the opportunity to receive a financial aid adjustment by requesting professional judgment (PJ)
  - Can meet this requirement by providing notice to applicants and recipients that they may be able to receive an aid adjustment due to the recent unemployment of a family member or independent student, or other circumstances

Direct Outreach Continued

- Must be direct one-to-one communication with each individual student
  - Does not require in-person interaction
- Can include but is not limited to:
  - Email or postal mail
  - Phone or voice communication
  - Webinar invitations
  - In-person interviews or meetings
  - Notification within student portal
- No specified timeframe
  - PJ adjustments cannot be made after student is no longer enrolled for the award year
- No specified amount of funds (but you must document an amount spent)
Reporting Requirements

HEERF III

- Institutions required to post to websites:
  - Quarterly Institutional Public Reporting Form and
  - Quarterly Student Public Reporting Form
- HEERF III funds will also be subject to the annual reporting requirement in early 2022
- ED considering adding to annual report:
  - How institutions prioritized exceptional need
  - How institutions implemented the two new institutional requirements
    - Activities to monitor/suppress COVID-19
    - Direct outreach on availability of aid adjustments

HEERF II

- Institutions must report publicly on their primary websites on a quarterly basis for both student portion and institutional portion funds
- ED extended the deadline by which institutions must submit retroactive reports for HEERF II to the end of the second calendar quarter, which is June 30, 2021
- HEERF II funds will also be subject to the annual reporting requirement in early 2022
### Allocations & Applications

#### Allocation Tables

- ED published HEERF III allocation tables for public, nonprofit, and proprietary institutions
  - Tables include maximum amount institution can spend for its institutional portion and minimum amount for student portion
  - [https://www2.ed.gov/about/offices/list/ope/arp.html](https://www2.ed.gov/about/offices/list/ope/arp.html)
- Institutions must expend their HEERF grant funds within one year from the date ED processed the institution's most recent obligation of funds
  - Institutions that received HEERF III funds have one year from the date of their HEERF III obligation to spend all remaining HEERF I, HEERF II, and HEERF III funds
  - Exact date appears in Box 6 of most recent Grant Award Notification (GAN)
Applications

- Public and private nonprofit institutions that received HEERF II funds and are on the HEERF III allocation tables don’t need to do anything to receive HEERF III funds
  - Must draw down some portion of both student and institutional funds within 90 days of the date of the supplemental HEERF III award (date on GAN)
  - Initial drawdown constitutes acceptance of terms and conditions of each allocation

Applications

- Proprietary institutions that received HEERF II funds and are on the HEERF III allocation tables don’t have to apply
  - Must submit the Required Proprietary Institution Certification form to receive HEERF III even if they received HEERF II
  - Must be received by August 11, 2021
  - Initial drawdown constitutes acceptance of terms and conditions of allocation

Applications

- All institutions that did not receive HEERF II funds but are listed on the HEERF III allocation tables must apply for the student and/or institutional portions separately at Grants.gov
  - Application and certification instructions are in Q&As #3 and #5 in the HEERF III FAQs
  - Must be received by August 11, 2021
Newly Eligible Students

- Biden Administration has reversed the Trump Administration’s interim rules that prohibited certain students from receiving HEERF funds
  - Any individual who is or was enrolled at an eligible institution on or after March 13, 2020 is now eligible for HEERF I, II, and III
    - Undocumented, DACA, and international students are now eligible
    - No longer required to be Title IV-eligible or be in a Title IV-eligible program
  - HEERF I, II, and III funds can be paid retroactively for costs incurred on or after March 13, 2020

- ED is encouraging (not requiring) schools to prioritize domestic undergraduate students in awarding these grants
- International students are eligible, but schools still have to ensure that they are prioritizing students with exceptional need
  - Includes students who were not in the U.S. but were enrolled and taking online classes from abroad
  - No special disbursement restrictions, meaning you can deliver the funds to an enrolled student overseas like any other student
Packaging HEERF Funds

Schools may **not:**
- Include the amount of a HEERF grant in a financial aid package (Q17 in ED FAQ)
- Condition the receipt of a HEERF grant on continued or future enrollment (Q11)
- Use HEERF grant funds to advertise or recruit students by promoting the opportunity to receive a HEERF grant (Q27)

Packaging HEERF Funds

- Student must have prior (on or after March 13, 2020) or current enrollment to receive a HEERF grant, however the school defines enrollment
NASFAA’s Webinar Series
COVID-19 and Federal Student Aid: HEERFs
Presented May 21, 2021

NASFAA HEERF Comparison Chart

Spring Debrief and HEERF III
Thursday, May 27, Times Vary By Sector
Register at NASFAA.org/blueicon_lets_talk
Space is limited.

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Webinar Schedule for 2020-21 - See You Online!

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