



# COVID-19 and Federal Student Aid: HEERFs

May 21, 2021

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May 2021



# NASFAA's Webinar Series

## COVID-19 and Federal Student Aid: HEERFs

Presented May 21, 2021



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### Webinar Housekeeping – Welcome!

- Audio is currently streaming
- Meet your presenters
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### Your Webinar X Presenters

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

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# NASFAA's Webinar Series

## COVID-19 and Federal Student Aid: HEERFs

Presented May 21, 2021

### 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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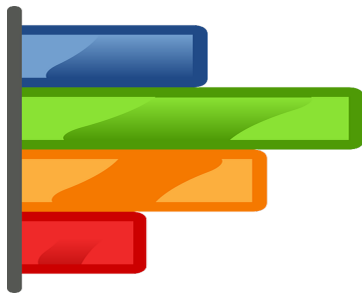
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### Poll Results



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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

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### Poll Results



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### 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

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### 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

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### 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

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### ▶ HEERF III Institutional Requirements



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### 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

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### 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

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### 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)

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## COVID-19 and Federal Student Aid: HEERFs

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### ▶ Reporting Requirements



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### 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

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### 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

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### NASFAA HEERF Reporting Cheatsheet



#### HEERF REPORTING GUIDELINES

CARES ACT (HEERF I), CRRSA ACT (HEERF II), ARP (HEERF III)

##### STUDENT FUNDS QUARTERLY REPORTING

**Who Must Complete**  
All institutions that received Student Funds under any of the three HEERF funding programs.

**Due Dates**  
Institutions that receive quarterly funding must submit their quarterly report to the HEERF Reporting System by the following dates:  
• CARES Act: April 15, July 15, October 15  
• CRRSA Act: Quarterly reporting to HEERF I, II, and III must be submitted by the end of the second calendar quarter, June 30, 2021.

**What To Report**  
Institutions must report that the institution spent and received the CARES Act and CRRSA Act funds for the institution's HEERF I, II, and III reporting periods. Institutions must also report the amount of the grant funds received by the institution for each reporting period.

**What To Report**  
Institutions must report the amount of the grant funds received by the institution for each reporting period. Institutions must also report the amount of the grant funds received by the institution for each reporting period.

##### INSTITUTIONAL FUNDS QUARTERLY REPORTING

**Who Must Complete**  
All institutions that received Institutional Funds under any of the three HEERF funding programs.

**Due Dates**  
Institutions that receive quarterly funding must submit their quarterly report to the HEERF Reporting System by the following dates:  
• CARES Act: April 15, July 15, October 15  
• CRRSA Act: Quarterly reporting to HEERF I, II, and III must be submitted by the end of the second calendar quarter, June 30, 2021.

**What To Report**  
Institutions must report the amount of the grant funds received by the institution for each reporting period. Institutions must also report the amount of the grant funds received by the institution for each reporting period.

##### ANNUAL PERFORMANCE REPORTING REQUIREMENTS

**Who Must Complete**  
All institutions that received any student funds under any of the three HEERF funding programs.

**HEERF I Due Date**  
The reporting period for the first HEERF I reporting period is from January 1, 2020, to March 31, 2021, and must be submitted by February 8, 2021.

**HEERF II Due Date**  
The reporting period for the first HEERF II reporting period is from January 1, 2021, to March 31, 2021, and must be submitted by February 8, 2021.

**HEERF III Due Date**  
The reporting period for the first HEERF III reporting period is from January 1, 2021, to March 31, 2021, and must be submitted by February 8, 2021.

**What To Report**  
Institutions must report the amount of the grant funds received by the institution for each reporting period. Institutions must also report the amount of the grant funds received by the institution for each reporting period.

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### Allocations & Applications



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### 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>
- 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)

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### 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

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### 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

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### 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

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► Student Eligibility



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### 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

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### Newly Eligible Students

- 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

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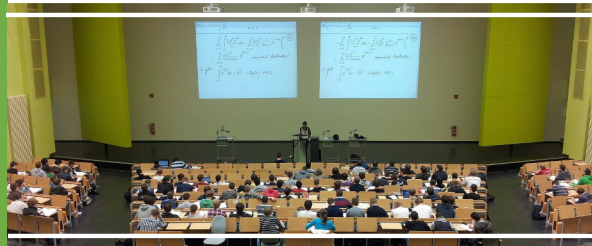


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### ► Packaging



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### 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)

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### 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

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## COVID-19 and Federal Student Aid: HEERFs

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### NASFAA HEERF Comparison Chart

Higher Education Emergency Relief Funds Comparison Chart March 2021			
Any updates to this chart made after the initial publication on March 25, 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 (CRRSAA 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"><li>• 50% of an institution's allotment must go to emergency financial aid grants to students</li></ul>	<ul style="list-style-type: none"><li>• Requires institutions to spend the same dollar amount on student grants as they were required to spend under the CARES Act</li><li>• For-profit must use 100% of their allotment on student grants</li></ul>	<ul style="list-style-type: none"><li>• At least 50% of an institution's total allotment must go to student grants</li><li>• For-profit must use 100% of their allotment on student grants</li></ul>
Allocation Formula	<ul style="list-style-type: none"><li>• 75% on the enrollment of full-time equivalent (FTE) Pell Grant recipients</li><li>• 25% on enrollment of FTE non-Pell Grant recipients</li><li>• Students who were enrolled exclusively in online distance education courses prior to the COVID-19 emergency were excluded from this calculation</li></ul>	<ul style="list-style-type: none"><li>• 37.5% on FTE enrollment of Pell Grant recipients who were not enrolled exclusively in distance education courses prior to the qualifying emergency</li><li>• 37.5% on headcount enrollment of Pell recipients who were not enrolled exclusively in distance education courses prior to the qualifying emergency</li><li>• 11.5% on FTE enrollment of non-Pell recipients who were not enrolled exclusively in distance education courses prior to the qualifying emergency</li><li>• 11.5% on headcount enrollment of non-Pell recipients who were not enrolled exclusively in distance education courses prior to the qualifying emergency</li><li>• 5% based on FTE enrollment of Pell recipients who were exclusively enrolled in distance education courses prior to the qualifying emergency</li><li>• 5% based on headcount of Pell recipients who were exclusively enrolled in distance education courses prior to the qualifying emergency</li></ul>	<ul style="list-style-type: none"><li>• 27.5% on FTE enrollment of Pell Grant recipients who were not enrolled exclusively in distance education courses prior to the qualifying emergency</li><li>• 27.5% on headcount enrollment of Pell recipients who were not enrolled exclusively in distance education courses prior to the qualifying emergency</li><li>• 11.5% on FTE enrollment of non-Pell recipients who were not enrolled exclusively in distance education courses prior to the qualifying emergency</li><li>• 11.5% on headcount enrollment of non-Pell recipients who were not enrolled exclusively in distance education courses prior to the qualifying emergency</li><li>• 5% based on FTE enrollment of Pell recipients who were exclusively enrolled in distance education courses prior to the qualifying emergency</li><li>• 5% based on headcount of Pell recipients who were exclusively enrolled in distance education courses prior to the qualifying emergency</li></ul>

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### Spring Debrief and HEERF III

Thursday, May 27, Times Vary By Sector  
Register at [NASFAA.org/blueicon\\_lets\\_talk](https://nasfaa.org/blueicon_lets_talk)  
Space is limited.

Let's Talk is the opposite of a webinar — we want to hear from YOU.  
When you attend, be prepared to join the discussion via video, voice, and chat!

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### Submit Your Questions

Q&A

Enter your question

Submit

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### Download Your Certificate of Attendance

The diagram shows a circular icon with a checkmark and a document symbol, connected by a dashed green arrow to a window titled "Certificate of Attendance". The window contains the text: "Thank you for viewing this NASFAA Webinar!", a green checkmark, "Minutes to Watch: 60", and a document icon with a blue ribbon.

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### Complete the Survey

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### Thank you for joining us!

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**COVID-19 and Federal Student Aid: HEERFs**  
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Topic	Air Date
2021-22 Verification Basics	09/16/2020
Foundations of Academic Calendars	10/02/2020
2021-22 FAFSA Update	10/07/2020
Developing Your Talents As A Financial Aid Professional	10/28/2020
Don't Be Alarmed By Clock Hours!	11/18/2020
Economics of Financial Aid	12/09/2020
NASFAA Policy Update (complimentary to members)	12/15/2020
Verification - Challenging Questions and Scenarios - Extended Edition	01/27/2021
Just Keep Swimming: An Aid Professional's Experience with Mental Health Issues	02/24/2021
Graduate and Professional School Town Hall 2020-21*	03/09/2021
NASFAA Quiz Show	04/21/2021
Panel Discussion: Data Sharing & Security	04/28/2021
Changes Are Coming to R2T4 and Modules: Will You Be Ready on July 1, 2021?	05/19/2021
NASFAA Policy Update (complimentary to members)	05/25/2021
Student Eligibility Spotlight	06/09/2021

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1801 PENNSYLVANIA AVENUE, NW, SUITE 850  
WASHINGTON, DC 20006-3606

202.785.0453 FAX. 202.785.1487 [WWW.NASFAA.ORG](http://WWW.NASFAA.ORG)