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# Summary of Higher Education Emergency Relief Funds (HEERF)

March 18, 2021  
UH Board of Regents



# Three COVID Response Bills

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1. CARES – Coronavirus Aid, Relief, and Economic Security Act
  - Signed into law on March 27, 2020
2. CRRSAA – Coronavirus Response and Relief Supplemental Appropriations Act
  - Signed into law on December 27, 2020
3. ARP - American Rescue Plan Act
  - Signed into law on March 11, 2021
  - The Higher Education Emergency Relief Fund (HEERF) is the formula-funded support to higher education in all three packages
  - These are sometimes referred to as HEERF I, II and III



# 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)
<b>Total HEERF Funding Amount</b>	<b>\$14 billion</b>	<b>\$23 billion</b>	<b>\$40 billion</b>
<b>Required Student Spending</b>	<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-profits 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-profits must use 100% of their allotment on student grants</li> </ul>
<b>Allocation Formula</b>	<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>● 1% based on FTE enrollment of Pell recipients who were exclusively enrolled in distance education course prior to the qualifying emergency</li> <li>● 1% 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>● 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>● 1% based on FTE enrollment of Pell recipients who were exclusively enrolled in distance education course prior to the qualifying emergency</li> <li>● 1% 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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<b>Funding Breakdown</b>	<ul style="list-style-type: none"> <li>● \$1 billion to minority-serving institutions</li> <li>● \$350 million to help colleges most affected by the crisis</li> </ul>	<ul style="list-style-type: none"> <li>● \$1.7 billion to minority-serving institutions</li> <li>● \$113.5 million for institutions with the greatest unmet need related to the pandemic through FIPSE</li> <li>● \$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)</li> </ul>	<ul style="list-style-type: none"> <li>● \$36 billion for public and private non-profits</li> <li>● \$3 billion for MSI</li> <li>● \$198 million unmet need</li> <li>● \$396 million for for-profit institutions (funds must only be used on student grants)</li> </ul>
<b>Requirement to Prioritize Need</b>	<ul style="list-style-type: none"> <li>● Not required by law, but ED guidance encouraged institutions to prioritize students with the greatest need</li> </ul>	<ul style="list-style-type: none"> <li>● Yes</li> </ul>	<ul style="list-style-type: none"> <li>● Yes</li> </ul>
<b>Student Portion Allowable Uses</b>	<ul style="list-style-type: none"> <li>● 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</li> <li>● Can be used for eligible COA expenses such as food, housing, course materials, technology, health care, and child care</li> </ul>	<ul style="list-style-type: none"> <li>● Any component of student's cost of attendance</li> <li>● Emergency costs that arise due to coronavirus, such as: tuition; food; housing; health care (including mental); childcare</li> </ul>	<ul style="list-style-type: none"> <li>● Any component of student's cost of attendance</li> <li>● Emergency costs that arise due to coronavirus, such as: tuition; food; housing; health care (including mental); childcare</li> </ul>
<b>Institutional Portion Allowable Uses</b>	<ul style="list-style-type: none"> <li>● Defray expenses due to significant changes to the delivery of instruction due to the coronavirus</li> <li>● Make additional financial aid grants to students</li> </ul>	<ul style="list-style-type: none"> <li>● Defray expenses associated with coronavirus including: <ul style="list-style-type: none"> <li>○ Lost revenue</li> <li>○ Reimbursement for expenses already incurred</li> <li>○ Technology costs associated with a transition to distance Education</li> <li>○ Faculty and staff trainings</li> <li>○ Payroll</li> </ul> </li> <li>● Carry out student support activities authorized by the HEA that address needs related to coronavirus</li> <li>● Make additional financial aid grants to students</li> </ul>	<ul style="list-style-type: none"> <li>● Defray expenses associated with coronavirus including: <ul style="list-style-type: none"> <li>○ Lost revenue</li> <li>○ Reimbursement for expenses already incurred</li> <li>○ Technology costs associated with a transition to distance education</li> <li>○ Faculty and staff trainings</li> <li>○ Payroll</li> </ul> </li> <li>● Make additional financial aid grants to students</li> </ul>



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Institutional Portion Allowable Uses (continued)			<ul style="list-style-type: none"> <li>● Institutions must use a portion of their allocation for:               <ul style="list-style-type: none"> <li>○ Implementing evidence-based practices to monitor and suppress coronavirus in accordance with public health guidelines; and</li> <li>○ 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</li> </ul> </li> </ul>
Student Eligibility	<ul style="list-style-type: none"> <li>● 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</li> <li>● DACA students, undocumented students and international students prohibited by ED guidance</li> <li>● Non-degree seeking, non-credit, dual enrollment, and continuing education students eligible per ED guidance</li> <li>● Online students who were enrolled exclusively in online programs on March 13th are not eligible per the law</li> </ul>	<ul style="list-style-type: none"> <li>● No student eligibility requirements in the law</li> <li>● Non-degree seeking, non-credit, dual enrollment, and continuing education students eligible per ED guidance</li> <li>● Students exclusively enrolled in distance education may receive these funds</li> <li>● ED has not issued written guidance to clarify whether or not undocumented, DACA, or international students may receive these funds</li> </ul>	<ul style="list-style-type: none"> <li>● No student eligibility requirements in the law</li> <li>● Students exclusively enrolled in distance education may receive these funds</li> <li>● ED has not issued written guidance to clarify whether or not undocumented, DACA, or international students may receive these funds</li> </ul>
Misc.	<ul style="list-style-type: none"> <li>● None</li> </ul>	<ul style="list-style-type: none"> <li>● 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</li> </ul>	<ul style="list-style-type: none"> <li>● 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</li> </ul>



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<b>Application Required to Receive Funds?</b>	<ul style="list-style-type: none"> <li>Institutions must sign the Funding Certification and Agreement for Emergency Grants for both the student and institutional portions of funding</li> </ul>	<ul style="list-style-type: none"> <li>Institutions who received funds under the CARES Act do not need to complete any application or forms to receive their allocation</li> <li>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</li> </ul>	<ul style="list-style-type: none"> <li>Specific requirements related to the application process for these funds have not been released yet</li> </ul>
<b>Reporting Requirements</b>	<ul style="list-style-type: none"> <li>Institutions must report publicly on their primary websites on a quarterly basis for both student portion and institutional portion funds</li> <li>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</li> </ul>	<ul style="list-style-type: none"> <li>Specific requirements for reporting of these funds have not been released yet</li> <li>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 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."</li> </ul>	<ul style="list-style-type: none"> <li>Specific requirements related to the reporting of these funds have not been released yet</li> </ul>
<b>Deadline to Spend Funds</b>	<ul style="list-style-type: none"> <li>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</li> </ul>	<ul style="list-style-type: none"> <li>An institution has one year from the date the school's supplemental grant was processed to distribute the HEERF II funds</li> </ul>	<ul style="list-style-type: none"> <li>Specific requirements related to the spending deadline for these funds have not been released yet</li> </ul>
<b>Counted as EFA, taxable income, untaxed income?</b>	<ul style="list-style-type: none"> <li>No</li> </ul>	<ul style="list-style-type: none"> <li>No</li> </ul>	<ul style="list-style-type: none"> <li>No</li> </ul>





# Maintenance of Effort - CRRSAA

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- SEC. 317. (a) At the time of award of funds to carry out sections 312 or 313 of this title, a State shall provide assurances that such State will maintain support for elementary and secondary education, and for higher education (which shall include State funding to institutions of higher education and state need-based financial aid, and shall not include support for capital projects or for research and development or tuition and fees paid by students) in fiscal year 2022 at least at **the proportional levels** of such State's support for elementary and secondary education and for higher education relative to such State's overall spending, averaged over fiscal years 2017, 2018, and 2019.



# UH System – Consolidated HEERF Summary

