

PROCESS FOR DETERMINING HOW TO ALLOCATE HEERF I (Higher Education Emergency Relief Funds) for Students under THE CARES ACT Provisions

Several populations of students, in the following order, were established in order to present them the opportunity to apply for HEERF funds, these population groups are as follows:

ACTIVELY ENROLLED: All students who were actively enrolled in programs as a regular¹ student on March 13, 2020.

ACTIVELY REGISTERED: All students who were officially registered² to begin a program starting date of March 16, 2020.

ACTIVELY ENROLLED HIGH SCHOOL SENIORS: All high school students pending current academic year graduation, who were actively enrolled in programs that required them to Re-Register³ to continue towards achieving certification for the group of courses in a certificate program of study.

ACTIVELY PURSUING ENROLLMENT: Any prospective student whose program required⁴ an application process and approval prior to registration, and an application submission for the **Fall section between May 15 – June 30**; Any prospective student who had begun working with a third party sponsor and had received approval to register for a Spring, Summer, or Fall start date.

APPLICATION QUESTIONS: A defined application process, including questions to determine a student's federal eligibility, student's need vs. expenses with a clear application processing timeframe and maximum award amount is provided on the College's established Scholarship Universe program site.

CONSIDERATIONS WEIGHED: With regard to **Expense vs. Need:** HEERF student share dollars are to aid students for expenses related to the disruption of campus operations due to the coronavirus; this is different than a change in a student's financial need due to COVID-19, which could be a result of a loss of income rather than new expenses. And, although in its HEERF FAQ document, ED⁵ states the following: "The criteria to participate in programs under Section 484 of the [Higher Education Act (HEA)] include but are not limited to the following: U.S. citizenship or eligible noncitizen; a valid Social Security number; registration with Selective Service (if the student is male); and a high school diploma, GED, or completion of high school in an approved homeschool setting." Beyond this guidance, a school will need to make its own decisions on how to document if a student is or could be Title IV-eligible when awarding HEERF grants to students. *While ED's guidance does not require a FAFSA, having one on file would be the only practicable way for an institution to determine that a student is eligible to participate in the Title IV programs and meet all of applicable student eligibility requirements. **International and Undocumented Students:** ED's April 21 guidance states that students must meet Title IV eligibility requirements in order to receive HEERF-student share funds. Therefore, international and undocumented students are not eligible to receive emergency grants.*

¹ A **regular student** is a person who enrolls for the purpose of obtaining a degree or a certificate in an eligible program offered by the school from which they are seeking assistance. The student must have been admitted by the College through the regular admissions process. ² MTECH registration steps completed and student's schedule was established or in the process of being established for a program starting date. ³ Tuition after graduation If a high school student continues at MTECH after their high school class graduation (whether or not the student graduated), tuition will be charged for any hours of coursework remaining. As graduation approaches, students with remaining hours to complete will be given a balance of tuition due that they must pay in order to remain in the program and complete their certificate. ⁴ **Registration Availability:** This program requires an application process and approval prior to registration. You must submit your application for the **Fall section between May 15 – June 30**. ⁵ U.S.

WHO IS CONSIDERED A STUDENT FOR HEERF EMERGENCY FINANCIAL AID GRANT PURPOSES

Posted on [June 15, 2021](#), by [Peter Terebesi](#)

According to a May 14, 2021, [Federal Register notice](#), The Education Department expanded the definition of who is an eligible “student” for the purposes of making Emergency Financial Aid Grants to Students under the Higher Education Emergency Relief Fund (HEERF) Programs. This rule is effective as of May 14, 2021, and you may need to adjust your HEERF awarding procedures accordingly.

The final regulations define “student,” for purposes of the phrases “grants to students,” “emergency financial aid grants to students,” and “financial aid grants to students” as used in the HEERF programs, as any individual who is or was enrolled (as defined in 34 CFR 668.2) at an eligible institution of higher education (IHE as defined in 34 CFR 600.2) on or after March 13, 2020, the date of declaration of the national emergency concerning the novel coronavirus disease. This definition enables an IHE to appropriately determine which individuals currently or previously enrolled at an institution are eligible to receive emergency financial aid grants to students under the HEERF programs, as originally enacted under the CARES Act and continued through the Coronavirus Response and Relief Supplemental Appropriations Act, 2021 (CRRSAA) (Pub. L. 116-260) and American Rescue Plan Act of 2021 (ARP) (Pub. L. 117-2).

Eligibility to Receive Emergency Financial Aid Grants to Students Under the Higher Education Emergency Relief Programs A Rule by the [Education Department](#) on [05/14/2021](#)

HEERF II – CRRSAA (Coronavirus Response and Relief Supplemental Appropriations Act)

Unlike the CARES Act, the CRRSAA does not require that 50% of an institution's funds be spent on student grants. It does, however, require that institutions spend at least the same dollar amount on student grants as they were required to spend under the CARES Act. In addition, the allowable uses of funds are more flexible than in the CARES Act, as illustrated in the table below. Additionally, any unused CARES Act funds that an institution did not spend prior to December 27, 2020 may be spent in accordance with the allowable uses of the HEERF II Funds. However, institutions are still required to adhere to the 50/50 institutional/student share split for CARES Act funds spent after December 27, 2020.

Student Funds

Institutions may award student grants for:

- any component of their cost of attendance
- emergency costs that arise due to coronavirus, such as:
 - tuition
 - food
 - housing
 - health care (including mental)
 - child care

Institutional Funds

Institutions may use the funds to:

- defray expenses associated with coronavirus, including:
 - 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**

Notably, similar to CARES, the CRRSAA includes *no student eligibility* requirements, however, institutions are required to prioritize grants to students with exceptional financial need, such as those who receive Pell Grants. The HEERF II funds can be awarded to online students as well. As a reminder, after a confusing and inconsistent implementation, Education Secretary Betsy DeVos issued an Interim Final Rule (IFR) on June 17, 2020, limiting eligibility for CARES Act emergency financial aid grants to students who met the eligibility criteria for Title IV student aid under Section 484 of the Higher Education Act (HEA). ED has confirmed that the IFR does not apply to HEERF II funds, however they believe the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) of 1996, which prohibits certain noncitizens from receiving federal benefits, applies to HEERF II funds, making DACA, undocumented, and international students ineligible.) It's important to note that **ED has not issued written guidance to clarify whether or not undocumented, DACA, or international students** may receive these funds, however a Trump administration official stated verbally that these students were not eligible.

FREQUENTLY ASKED QUESTIONS CAN BE ACCESSED AT THE FOLLOWING WEBSITE ADDRESS:

<https://www2.ed.gov/about/offices/list/ope/updatedfaqsfora1crrssaheerfii.pdf>

HEERF III – ARP (American Rescue Plan)

Relief Fund III (HEERF III) NAFSAA Reference Page

This page contains information related to the Higher Education Emergency Relief Funds III (HEERF III) created under the American Rescue Plan (ARP). Check back often as NASFAA will continue to update this reference page as any new guidance becomes available. Updates will be marked below in red. More information and resources on how the novel coronavirus is impacting student financial aid as well as information about the HEERF grants made available through the CARES Act in early March 2020 and the CRRSA Act in late December 2020, can be found on NASFAA's [COVID-19 Web Center](#). NASFAA has also created a [comparison chart](#) that outlines the requirements and allowable uses for all three HEERF fund allocations.

Overview

The [American Rescue Plan](#) (ARP) included additional COVID-19 relief for institutions of higher education. This new COVID stimulus bill included \$40 billion, available through September 30, 2023, for higher education institutions and students, using the same Higher Education Emergency Relief Fund (HEERF) model established in the Coronavirus Aid, Relief and Economic Security (CARES) Act.

Allowable Uses

The ARP HEERF III funds require that 50% of an institution's funds be spent on student grants, with the exception of for-profit institutions, which must spend 100% of their funds on student grants. In addition, the allowable uses of funds are nearly identical to the [CRRSA HEERF II](#) funding as illustrated below.

Student Portion

Institutions may award student grants for:

- Any component of their cost of attendance
- Emergency costs that arise due to coronavirus, such as: tuition; food; housing; health care (including mental); child care

Institutional Portion

Institutions may use the grants toward:

Defray expenses associated with coronavirus including:

- 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

Institutions must use a portion of their allocation for:

- 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

Frequently Asked Questions and Answers:

<https://www.irs.gov/newsroom/higher-education-emergency-grants-frequently-asked-questions>

<https://oese.ed.gov/offices/american-rescue-plan/american-rescue-plan-elementary-secondary-school-emergency-relief-homeless-children-youth-arp-hcy/frequently-asked-arp-hcy-questions-and-answers/>

<https://www2.ed.gov/about/offices/list/ope/arpfaq.pdf>

Q: Which students are eligible to receive HEERF III emergency funds?

A: Similar to the HEERF II funds, the HEERF III funds include no student eligibility requirements either. However, institutions are required to prioritize grants to students with exceptional financial need, such as those who receive Pell Grants. The HEERF III funds can be awarded to online students as well. To date, ED has not issued written guidance to clarify whether or not undocumented, DACA, or international students may receive these funds, however a Trump administration official stated verbally that these students were not eligible for HEERF II funds because of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, which would presumably apply to HEERF III funds as well.

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