

## CRRSA Emergency Financial Aid Grant – *FINAL March 17, 2021*

### Background (from NASFAA):

The Consolidated Appropriations Act, 2021 included additional COVID-19 relief through the Coronavirus Response and Relief Supplemental Appropriations (CRRSA) Act. This new COVID stimulus bill included \$23 billion 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. It is sometimes referenced as HEERF II.

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. Students may use the grants toward:

- Any component of their cost of attendance
- Emergency costs that arise due to coronavirus, such as:
  - Tuition
  - Food
  - Housing
  - Healthcare (including mental)
  - Child care

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. ED believes 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.)

The following proposal for Minnesota State University Moorhead was developed with guidance from the Minnesota State and University System and within the Federal CRRSA Act.

<https://www2.ed.gov/about/offices/list/ope/crrsaa.html>

**CRRSAA Funding Levels for Minnesota State University Moorhead:**

<https://www2.ed.gov/about/offices/list/ope/314a1allocationtableheerfii.pdf>

Total Allocation: \$5,854,267

Minimum Allocation to be Awarded for Emergency Financial Aid Grant to Students: **\$1,759,267**

Proposed Utilization:

HEERF II Immediate Disbursement:	\$1,710,950	(97%)
<u>HEERF II Application Requests:</u>	<u>48,317</u>	<u>(3%)</u>
	<b>\$1,759,267</b>	<b>(100%)</b>

**An additional 7% = \$122,778 will come from institutional funds to award through application requests as required by the MinnState System Office.**

The selection criteria for students is as follows:

- Enrolled in and attending at least one course that is all of the following:
  - Credit-earning (therefore excluding audited courses)
  - Semester-based course
  - Enrolled as of March 5, 2021 (mid-point of term)
- Of the students selected above, the following students are removed from the list
  - HS Students per admission statuses '21' and '22'
  - Seniors receiving the special AR discount rate
  - DACA/DREAM Act Students as per MNSG received with no ISIR on file
  - Incarcerated per a cohort code having type '04'
  - International student per a current F1 Visa status from SEVIS

Total number of students reviewed to determine “exceptional financial need”:  
4,747

Total number of students determined to have “exceptional financial need”:  
2423

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## Proposal

### **Spring 2021: \$1,699,267**

Need-based Award (Award ID 10306):

Based on 2020-2021 9-month EFC (Expected Family Contribution) from the FAFSA (undergraduate and graduate):

EFC	# of students	% total	Need-based Award:	Total Emergency Aid:
\$0 - \$5,711	1383	57%	\$900	\$1,244,700
\$5,712 - \$11,999	589	24%	\$600	353,400
\$12,000 - \$19,999	451	19%	\$250	112,750
<b>Total:</b>	<b>2,423</b>	<b>100%</b>		<b>\$1,710,950</b>

Grant of \$900 awarded to students (both graduate and undergraduate) who have an EFC of \$5,711 (Pell-eligible EFC) or less for the 2020-21 academic year.

\$900 x 1383 (approximate # of eligible students): \$1,244,700

Grant of \$600 awarded to students (both graduate and undergraduate) who have an EFC between \$5,712 to \$11,999 for the 2020-21 academic year.

\$600 x 589 (approximate # of eligible students): \$353,400

Grant of \$250 awarded to students (both graduate and undergraduate) who have an EFC between \$12,000 to \$19,999 for the 2020-21 academic year.

\$250 x 451 (approximate # of eligible students): \$112,750

### **FY2021 and FY2022: \$48,317**

Emergency Awards (Award ID 10307): These funds are reserved for students and families who submit a professional judgement appeal form and/or Student Emergency Assistance Fund request for a loss of income or assistance with cost of attendance components. Financial aid appeals will continue to be reviewed by the Assistant Directors and Director within the office as is the current model. The Student Emergency Assistance Fund review process that is currently in place will be used to award emergency funds. These funds would be available for current students for FY2021 and FY2022. These funds must follow the same guidelines and are distributed directly to students, unless there is written consent from the student to have funds apply directly to the students account, which in that case, requires use of a different Award ID (10308).

## **Approval Process**

This proposal will be shared with administration and upon approval brought forward to Student Senate.

## **Awarding and Distribution**

Once approved, funds will be awarded to students utilizing common award ID's set up by the system office. MSUM will provide a spreadsheet of all eligible students that lists student ID, award ID and amount to be awarded to System IT Office. Emergency Awards will be placed on students accounts by OSFA staff.

## **Considerations:**

- Students will not be issued a 1098T for these funds. ED has determined that a 1099 is not required.
- Business Services requests the funds via grants.gov

“Unlike the CARES Act, the CRRSAA requires that institutions prioritize students with exceptional need, such as students who receive Pell Grants, in awarding financial aid grants to students. However, students do not need to be only Pell recipients or students who are eligible for Pell grants. In addition, the CRRSAA explicitly provides that financial aid grants to students may be provided to students exclusively enrolled in distance education.” (As opposed to CARES funds not being available for students enrolled in distance education.)

“Institutions may not condition the receipt of financial aid grants to students on continued or future enrollment in the institution, use the financial aid grants to satisfy a student's outstanding account balance, unless it has obtained the student's written (or electronic), affirmative consent, or require such consent as a condition of receipt of or eligibility for the financial aid grant.

Institutions should carefully document how they prioritize students with exceptional need in distributing financial aid grants to students, as the Department intends to establish reporting requirements regarding the distribution of financial aid grants to students consistent with section 314(e) of CRRSAA.”

**Award ID's set up by system IT:**

Award ID	Short Description	Long Description
10305	CRRSAA Base	CRRSAA Base Award
10306	CRRSAA Sup	CRRSAA Supplemental Award
10307	CRRSAA SpecS	CRRSAA Special Circ Awd-Student
10308	CRRSAA SpecC	CRRSAA Special Circ Awd-College Charges
10309	CRRSAA InstS	CRRSAA Institutional Funds-Student
10310	CRRSAA InstC	CRRSAA Inst Funds-College Charges

# Department of Education Provides Answers to Outstanding HEERF II Questions

By NASFAA Policy & Federal Relations Team (<mailto:news@nasfaa.org>)

On Friday, the Department of Education (ED) provided written **responses** ([/uploads/documents/ED\\_HEERF2\\_Updates.pdf](/uploads/documents/ED_HEERF2_Updates.pdf)) to several outstanding questions **sent by the community** (<https://www.acenet.edu/Documents/Letter-Cardona-Guidance-Questions-021021.pdf>) related to the second round of Higher Education Emergency Relief Fund (HEERF II) aid that was authorized under the Coronavirus Response and Relief Supplemental Appropriations Act, 2021 (CRRSAA ([/consolidated\\_approps\\_21](/consolidated_approps_21))), which was signed into law on Dec. 27, 2020.

The questions and answers were provided directly to the higher education community from ED staff, and they have indicated that they will formally publish the Q&A document in the near future.

For students who have ceased enrollment from their institutions for any reason and at any point since the national emergency was declared on March 13, 2020, ED has clarified that they may receive emergency grants from HEERF II as well as unspent CARES Act HEERF I funds.

ED clarifies also that students can authorize institutions to apply HEERF II grants to student account charges, even in cases where the charges were posted prior to Dec. 27, 2020. Still unanswered is the question of whether HEERF II grants can cover student expenses incurred prior to Dec. 27, 2020 in situations where the institution is releasing the HEERF II grant directly to the student. In the absence of student authorization to apply HEERF II grants to student account charges, institutions are still permitted to use the student's account as a pass-through mechanism for disbursing grants directly to the student, as was permitted for CARES Act HEERF I funds, so long as those funds remain unencumbered by the institution. ED indicated that it is in the process of developing guidance on awarding emergency grants for expenses incurred prior to Dec. 27, 2020.

[s://www.nasfaa.org/news-item/24874/Department\\_of\\_Education\\_Provides\\_Answers\\_to\\_Outstanding\\_HEERF\\_II\\_Questions](https://www.nasfaa.org/news-item/24874/Department_of_Education_Provides_Answers_to_Outstanding_HEERF_II_Questions)

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In their communication, ED confirmed that institutions have one year to spend funds from the date when ED processed the most recent obligation of funds for that specific grant. This is consistent with the law, but needed clarification because many institutions received Grant Award Notifications (GANs) for their HEERF II funds with spending deadline dates that incorrectly reflected their Coronavirus Aid, Relief, and Economic Security (CARES) Act HEERF I spending deadlines. ED has indicated separately that it will issue revised HEERF II GANs with correct spending deadlines, but is focusing first on getting HEERF II funds distributed to institutions.

ED has clarified that non-degree seeking, non-credit, dual enrollment, and continuing education students are all eligible to receive HEERF II student grants as well as unspent CARES Act HEERF I student grants. On the question of undocumented students, international students, and Deferred Action for Childhood Arrivals (DACA) students, ED indicates only that it is exploring additional opportunities for colleges to support such students. Currently, these students cannot receive HEERF dollars because the most recent interpretation from ED, which came from the Trump administration, stated that the 1996 Personal Responsibility and Work Opportunity Act (PROWA), which prohibits certain noncitizens from receiving federal benefits, applies here. NASFAA and other associations have **urged** ([/news-item/24582/NASFAA\\_Urges\\_ED\\_to\\_Clarify\\_that\\_Undocumented\\_International\\_Students\\_Eligible\\_Emergency\\_Aid](/news-item/24582/NASFAA_Urges_ED_to_Clarify_that_Undocumented_International_Students_Eligible_Emergency_Aid)) ED to allow undocumented students, Deferred Action for Childhood Arrivals (DACA) recipients, and international students to be eligible to receive emergency aid grants from the new round of Higher Education Emergency Relief Fund aid (HEERF II).

**U.S. Department of Education  
CARES ACT Higher Education Emergency Relief Fund- IHEs (CFDA:  
84:425E)**

**Application must be submitted electronically using GRANTS.gov  
<https://www.Grants.gov>**

**Funding Opportunity Number: ED-GRANTS-041020-003  
Closing Date: September 30, 2020**

**Instructions for Submitting the Recipient's Funding Certification and  
Agreement and Application Forms**

**A Guide for apply for funding in GRANTS.gov can be located at  
<https://www2.ed.gov/about/offices/list/ope/caresact.html>**

In order to apply for funding, an institution must have an account with Grants.gov.

If you **do not** have a Grants.gov account, you may create an account at the following link: <https://www.grants.gov/web/grants/applicants/registration.html>. Please contact the Grants.gov Help Desk at 1-800-518-4726 or [support@grants.gov](mailto:support@grants.gov) if you have any questions regarding registration. After you create a Grants.gov account, you can access Grants.gov and follow the guidance below for submitting documents.

If you **do** have a Grants.gov account, you can access Grants.gov and follow the guidance below for submitting documents.

**To locate the Funding Opportunity, you must go to the Applicant Tab, then How to Apply for Grants; once there, click Search for Opportunity Package, enter the Funding Opportunity Number and click Search.**

The process for applying for funding requires:

1. Downloading and completing offline the [Recipient's Funding Certification and Agreement](https://www2.ed.gov/about/offices/list/ope/caresact.html) provided in the Grants.gov application package or from <https://www2.ed.gov/about/offices/list/ope/caresact.html>
2. Completing the Application for Federal Assistance (SF-424).
3. Completing the Department of Education Supplemental Information Form for the SF-424.