

26-Jul7-2021 | Prepared by: Myrna Perkins, Director of Financial Aid

Overview

"The Higher Education Emergency Relief Fund III (HEERF III) is authorized by the American Rescue Plan (ARP), Public Law 117-2, signed into law on March 11, 2021, providing \$39.6 billion in support to institutions of higher education to serve students and ensure learning continues during the COVID-19 pandemic.

ARP funds are in addition to funds authorized by the Coronavirus Response and Relief Supplemental Appropriations Act, 2021 (CRRSAA), Public Law 116-260 and the Coronavirus Aid, Recovery, and Economic Security (CARES) Act, Public Law 116-136. Emergency funds available to institutions and their students under all emergency funds total \$76.2 billion." [Quoted from link provided below.]

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

According to the U.S. Department of Education (ED) each institution is responsible for developing institutional policies and procedures for processing, distributing, and reporting on distribution of these funds. Upon careful review of all guidance provided, study of the spirit of the American Rescue Plan Act, participation in discussions with state and national peer institutions, and review of Barton data, the following recommendations are being presented. These recommendations have been developed with the letter and spirit of the statute.

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

Barton's Student Allocation of HEERF Funding: \$2,479,809.00.

Distribution Policies and Procedures

"As under the CRRSAA, institutions are directed with the ARP funds to prioritize students with exceptional need, such as students who receive Pell Grants or are undergraduates with extraordinary financial circumstances in awarding emergency financial aid grants to students.

Beyond Pell eligibility, other types of exceptional need could include students who may be eligible for other federal or state need-based aid or have faced significant unexpected expenses, such as the loss of employment (either for themselves or their families), reduced income, or food or housing insecurity.

The Department's final rule on student eligibility for HEERF states that all students who are or were enrolled in an institution of higher education during the COVID-19 national emergency are eligible for emergency financial aid grants from the HEERF, regardless of whether they completed a FAFSA or are eligible for Title IV. That includes citizens, permanent residents, refugees, asylum seekers, Deferred Action for Childhood Arrivals (DACA) recipients, other DREAMers, and similar undocumented students.

International students may also receive HEERF. However, as noted in Questions 11 and 12, institutions must ensure that funds go to students who have exceptional need. The Department encourages

institutions to prioritize domestic students, especially undergraduates, in allocating this funding. This includes citizens, permanent residents, refugees, asylum seekers, DACA recipients, other DREAMers, and similar undocumented students."

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

Upon careful review of all guidance provided, study of the spirit of the ARP Act, state and national peer opinions, and review of Barton data, the following is recommended for distribution of HEERF III funding to students:

➤ **1st Priority:**

Pell-eligible students

Or

Domestic students, including citizens, permanent residents, refugees, asylum seekers, DACA recipients, other DREAMers, and similar undocumented students with exceptional need due to:

- ✓ Loss of employment
- ✓ Reduced income
- ✓ Food or housing insecurity
- ✓ Eligibility for federal or state need-based aid
- ✓ Other, as applicable and documented

➤ **2nd Priority:**

International students with exceptional need due to:

- ✓ Loss of employment
- ✓ Reduced income
- ✓ Food or housing insecurity
- ✓ Eligibility for federal or state need-based aid
- ✓ Other, as applicable and documented

➤ **Selection Process:** Students must complete a HEERF Application through Scholarship Universe. The applications will be processed and awarded by Barton's Financial Aid Office.

➤ **Block Grant Award Amounts:**

Term Enrollment Level	Number of Credit Hours	Award Amount
Full-time	12 credits	\$1000
$\frac{3}{4}$ Time	9-11 credits	\$750
$\frac{1}{2}$ Time	6-8 credits	\$500
$< \frac{1}{2}$ Time	< 6 credits	\$250

➤ **Previous Award Year Balance:** Students impacted by the pandemic may appeal for an amount to cover a previous award year balance subject to allocation amount availability.

➤ **Student Authorization for Student Account Credit:** On the HEERF application, students will have the option to authorize Barton to directly credit the HEERF funds to an existing balance.

Notification to Students

Cougar Greetings!

Barton hopes this message finds you well and excited for the fall 2021 semester!

Federal funds have been made available to Barton Community College through the American Rescue Plan or (ARP) Act. This is also referenced as the Higher Education Emergency Relief Fund III, (HEERF III). Through this act, funding is available to students with exceptional need or who were financially impacted due to the COVID-19 pandemic. After reviewing the eligibility requirements Barton has determined eligibility based upon HEERF III funding guidance provided by the U.S. Department of Education.

The purpose of this message is to inform you in order to be considered for HEERF III funds, you must complete a HEERF Funding Application through Scholarship Universe. Once an application is submitted, you will be instructed regarding any additional steps you may need to take.

If your eligibility is determined, you will receive HEERF III funds based upon the number of credit hours in which you are enrolled for the fall 2021 semester. HEERF III funds can be used towards your student account balance if you provide authorization for Barton's Business Office to take this action. Otherwise, any award amounts will be distributed either as a direct deposit to an account you've specified or a paper check will be mailed.

If you feel you may qualify for HEERF III funds, you may apply for these through your Barton Portal Account and by accessing Scholarship Universe and the HEERF Application. Once submitted, you will be notified of any additional steps you need to take or if you are awarded HEERF funds.

If you have any questions or concerns about any matter, including future enrollments, please reach out to us.

Best regards,

Direct Outreach Professional Judgment Notification

Good day!

If you or your family has been financially impacted by the COVID pandemic, you may appeal for Barton's Financial Aid Office to exercise the use of professional judgment available under Section 479A of the Higher Education Act of 1965 (HEA), 20 U.S.C § 1087tt, to determine need and eligibility for receipt of HEERF student emergency grants or for increased eligibility of Title IV funding.

To appeal, please submit your request to: financialaid@bartonccc.edu.

Once reviewed, Barton's Financial Aid Office will notify you of any additional steps you need to take.

If you have any questions or concerns about any matter, please reach out to us.

Best regards,

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

Higher Education Emergency Relief Fund III

B. Emergency Financial Aid Grant to Students Questions

7. Question: Which students are eligible to receive emergency financial aid grants?

Answer: As announced in the Department’s final rule, the term “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, is now defined as any individual who is or was enrolled (as defined in 34 CFR § 668.2) at an eligible institution (as defined in 34 CFR § 600.2) on or after March 13, 2020, the date of declaration of the national emergency due to the coronavirus (85 FR 15337). Thus, students are no longer required to be eligible for Title IV student financial aid in order to receive HEERF grants to students.

Put more plainly, students who are or were enrolled in an institution of higher education during the COVID-19 national emergency are eligible for emergency financial aid grants from the HEERF, regardless of whether they completed a Free Application for Federal Student Aid (FAFSA) or are eligible for Title IV. As under the CRRSAA, institutions are directed with the ARP funds to prioritize students with exceptional need, such as students who receive Pell Grants or are undergraduates with extraordinary financial circumstances in awarding emergency financial aid grants to students.

Beyond Pell eligibility, other types of exceptional need could include students who may be eligible for other federal or state need-based aid or have faced significant unexpected expenses, such as the loss of employment (either for themselves or their families), reduced income, or food or housing insecurity. In addition, the CRRSAA and ARP explicitly state that emergency financial aid grants to students may be provided to students exclusively enrolled in distance education.

8. Question: May undocumented students and international students receive HEERF?

Answer: Yes. The Department’s final rule on student eligibility for HEERF states that all students who are or were enrolled in an institution of higher education during the COVID-19 national emergency are eligible for emergency financial aid grants from the HEERF, regardless of whether they completed a FAFSA or are eligible for Title IV. That includes citizens, permanent residents, refugees, asylum seekers, Deferred Action for 8 Childhood Arrival (DACA) recipients, other DREAMers, and similar undocumented students.

International students may also receive HEERF. However, as noted in Questions 11 and 12, institutions must ensure that funds go to students who have exceptional need. The Department encourages institutions to prioritize domestic students, especially undergraduates, in allocating this funding. This includes citizens, permanent residents, refugees, asylum seekers, DACA recipients, other DREAMers, and similar undocumented students.

9. Question: Can students who are studying abroad receive HEERF emergency financial aid grants?

Answer: Yes. Students studying abroad may receive HEERF emergency financial aid grants from the recipient institution where they are enrolled. These students must meet the criteria based on prioritizing exceptional need that the institution has established for distributing its HEERF emergency financial aid grants.

10. Question: What civil rights requirements must institutions comply with when distributing emergency financial aid grants to students under the HEERF programs?

Answer: HEERF grantees must not distribute student emergency financial aid grants in a manner that discriminates against individuals on the basis of race, color, national origin, disability, or sex. See, e.g., 42 U.S.C. § 2000d et seq., (Title VI), 29 U.S.C. § 701 et seq. (Rehabilitation Act), 20 U.S.C. § 1681 (Title IX).

11. Question: What are the requirements for making emergency financial aid grants to students?

Answer: Students who are or were enrolled in an institution of higher education on or after the date of the declaration of the national emergency due to the coronavirus (March 13, 2020) are eligible for emergency financial aid grants from the HEERF, regardless of whether they completed a FAFSA or are eligible for Title IV. The CRRSAA requires that institutions prioritize students with exceptional need, such as students who receive Pell Grants or are undergraduates with extraordinary financial circumstances, in awarding emergency financial aid grants to students.

Beyond Pell eligibility, other types of exceptional need could include students who may be eligible for other federal or state need-based aid or have faced significant unexpected expenses either for themselves or that would affect their financial circumstances, such as the loss of employment, reduced income, or food or housing insecurity. In addition, the CRRSAA explicitly states that emergency financial aid grants to students may be provided to students exclusively enrolled in distance education provided they have exceptional need.

The Department encourages institutions to prioritize domestic students, especially undergraduates, in allocating this funding. Domestic students include citizens, permanent 9 residents, refugees, asylum seekers, DACA recipients, other DREAMers, and similar undocumented students.

Institutions may not (1) condition the receipt of emergency financial aid grants to students on continued or future enrollment in the institution, (2) use the emergency financial aid grants to satisfy a student's outstanding account balance, unless it has obtained the student's written (or electronic), affirmative consent, or (3) require such consent as a condition of receipt of or eligibility for the emergency financial aid grant.

Institutions should carefully document how they prioritize students with exceptional need in distributing emergency financial aid grants to students, as the Department is exploring reporting requirements regarding the distribution of emergency financial aid grants to students (see 2 CFR § 200.334).

12. Question: When might the Department determine that an institution has failed to prioritize emergency financial aid grants to students with exceptional need?

Answer: The Department will make an individualized determination about whether an institution failed to prioritize emergency financial aid grants to students with exceptional need. The Department may determine an institution has failed to do so if the institution established preconditions for students to receive emergency financial aid grants (e.g., (1) establishing a minimum GPA, (2) imposing other academic or athletic performance or good standing requirements, (3) requiring continued enrollment in the institution or (4) required the student to first pay any outstanding debt or balance) that results in failure to prioritize students with exceptional need.

13. Question: How may students use their emergency financial aid grants?

Answer: Emergency financial aid grants may be used by students for any component of their cost of attendance or for emergency costs that arise due to coronavirus, such as tuition, food, housing, health care (including mental health care) or child care. Students determine how they may use their emergency financial aid grant within the allowable uses.

14. Question: Can an institution direct or control what students may use their emergency financial aid grants on?

Answer: No. The student emergency financial aid grant is provided to the student, and may be used by the student for any component of the student's cost of attendance or for emergency costs that arise due to coronavirus, such as tuition, food, housing, health care (including mental health care), or child care.

For example, as described in Questions 11 and 12, institutions may not compel a student to use a portion of their grants to satisfy any existing debts or balance.

15. Question: Are emergency financial aid grants to students under the HEERF program considered taxable income?

Answer: No. Emergency financial aid grants made by a federal agency, State, Indian tribe, higher education institution or scholarship-granting organization (including a tribal organization) to a student because of an event related to the COVID-19 national emergency are not included in the student's gross income. For more information, please see the Internal Revenue Service (IRS) bulletin Emergency aid granted to students due to COVID is not taxable (March 30, 2021).

16. Question: Should institutions include a student's receipt of a HEERF emergency financial aid grant when calculating that student's Expected Family Contribution?

Answer: As stated in the Department's April 3, 2020 Electronic Announcement, "[a]ny aid (in the form of grants or low-interest loans) received by victims of an emergency from a federal or state entity for the purpose of providing financial relief is not counted as income for calculating a family's Expected Family Contribution (EFC) under the Federal Methodology or as estimated financial assistance for packaging purposes." As such, any HEERF emergency financial aid grant received by a student under the CARES Act, CRRSAA, or ARP should not be counted as income when calculating a family's EFC.

7. Question: Can institutions include the amount of a HEERF student emergency financial aid grant in students' financial aid award package?

Answer: No, these emergency financial aid grants are not financial aid. As always, students have discretion about how they receive their grants, and institutions must receive affirmative written consent from students before using emergency financial aid grants to satisfy a student's outstanding account balance. Additionally, as described in Question 27, institutions may not use HEERF grant funds to advertise or recruit students by promoting the opportunity to receive a student emergency financial aid grant.

18. Question: What steps can my institution take if a student does not cash a check issued for student's emergency financial aid grant?

Answer: If a student does not cash their emergency financial aid grant check by a reasonable date, the institution may choose to void the check and redistribute the funds to other students by the end of their HEERF grant performance period. Institutions should engage in reasonable attempts to contact a student prior to voiding a check for an emergency financial aid grant and should document the procedures, policies, and general student contact efforts made and followed as part of their administration of their HEERF grants.¹

¹ Please see Question 19 of the Higher Education Emergency Relief Fund (HEERF) Frequently Asked Questions (FAQ) Rollup Document for more details as to how institutions may distribute the emergency financial aid grants to students, if not applying directly it to a student's account after obtaining the student's written (or electronic), affirmative consent.

19. Question: Can my institution use HEERF grant funds for students (ALNs 84.425E or 84.425Q) to recover stop-payment fees incurred due to voided and re-issued student financial aid checks that were lost or never received by the student?

Answer: No. Stop-payment fees on checks that were lost or never received by the student are administrative costs associated with administering the Student Aid Portion award. Such administrative costs are not allowable expenses under the ARP (a)(1) Student Aid Portion and (a)(4) grants since all those funds must be distributed to students as emergency financial aid grants. However, stop payment fees may be an allowable expenditure under the HEERF (a)(1) Institutional Portion grant provided the fees are reasonable.

American Rescue Plan

On Thursday, March 11, 2021, President Biden signed into law the American Rescue Plan (ARP) Act, which will deliver critical aid to States (as well as Puerto Rico and the District of Columbia), districts, schools, educators, students, and families as the country continues to recover from the COVID-19 pandemic. The U.S. Department of Education (Department) will move quickly to get these vital resources to each State, Puerto Rico, and the District of Columbia.

The Department is committed to supporting State educational agencies (SEAs) and school districts in implementing these unprecedented resources to promote safe school operations and equity-driven, sustainable, evidence-based programs to serve students – especially those who are the furthest from opportunity – and to continue to strengthen teaching and learning.

- ARP law: [R. 1319](#)

https://www2.ed.gov/about/offices/list/ope/arpfaq.pdf?utm_content=&utm_medium=email&utm_name=&utm_source=govdelivery&utm_term=

Is a Student Who Is Simultaneously Enrolled In High School and College Eligible For HEERF I, HEERF II, Or HEERF III Funds?

This AskRegs Knowledgebase Q&A was updated on May 14, 2021 to include guidance in the May 11, 2021 [Higher Education Emergency Relief Fund \(HEERF\) III Frequently Asked Questions](#) and the [May 14, 2021 Final Rule](#) as it relates to HEERF I grants under the [Coronavirus Aid, Relief, and Economic Security Act \(CARES Act\)](#), HEERF II grants under the [2021 Coronavirus Response and Relief Supplemental Appropriations Act \(CRRSAA, Section 314 of the Consolidated Appropriations Act, 2021\)](#), and HEERF III grants under the [American Rescue Plan Act of 2021 \(ARP\)](#).

Yes. According to the U.S. Department of Education's (ED's) Final Rule, any individual who is or was enrolled at an eligible institution on or after March 13, 2020 is now eligible for HEERF I, HEERF II, and HEERF III student grants. According to the HEERF III FAQs and the Final Rule, this is true regardless of whether the student completed a FAFSA or is eligible for Title IV federal student aid. And, it applies retroactively to all students and for all three HEERF programs.

This includes those who are or were simultaneously enrolled in high school and college during the period of the qualifying emergency, as long as the school prioritizes the receipt of leftover HEERF I funds, HEERF II funds, and HEERF III funds based on exceptional need and awards the funds to cover any component of the student's cost of attendance (COA) or emergency costs that arise due to Coronavirus (i.e., the allowable uses under the CRRSAA and ARP).

Reference the Final Rule and Q&As #7 and #8 in the HEERF III Frequently Asked Questions, as well as Q&A #16 of the revised [HEERF II Frequently Asked Questions](#).

This guidance and Final Rule represents a break from the Trump administration's previous interpretation, which held that students needed to be Title IV-eligible students in Title IV-eligible programs to qualify for HEERF grants. See AskRegs Q&A, [Must a Student Be Title IV-Eligible To Receive a HEERF I, HEERF II, or HEERF III Grant?](#), for historical background information.

NASFAA Higher Education Emergency Relief Fund III (HEERF III) 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 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

The American Rescue Plan included two new spending requirements for HEERF III institutional share dollars.

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- Institutions are now required to spend a portion of their institutional share to implement evidence-based practices to monitor and suppress coronavirus in accordance with public health guidelines, and to conduct direct outreach to financial aid applicants about the opportunity to receive a financial aid adjustment by requesting professional judgment (PJ). These requirements do not apply to institutions that choose to use all of their institutional share allocation to make student emergency grants.

Frequently Asked Questions and Answers

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. Eligible student groups include citizens, permanent residents, international students, refugees, asylum seekers, DACA recipients, other DREAMers, and similar undocumented students.

Q: I'm a proprietary school. What can I use my funds for?

A: While \$396 million is allocated for use by for-profit, or proprietary institutions, any funds received by proprietary institutions would only be allowed to be used for emergency grants for students. See the chart above for allowable uses for students.

Q: Do I need to draw down my HEERF III funds by a certain deadline?

A: Schools that previously received either HEERF I or HEERF II funds are required to start drawing down funds from both the student and institutional portions of HEERF II funds within 90 days of receiving their respective supplemental HEERF II award notifications. ED has not yet issued guidance on the amount of time institutions have to begin drawing down HEERF III funds. Additionally, schools should not simply draw down its entire HEERF III student and institutional allocations at once. All HEERF funds must be drawn down only as necessary to meet immediate cash need for spending the funds. That is, schools must spend funds for student grants within 15 calendar days of drawing down those funds from G5, whereas funds used for purposes other than the awarding of student grants must be spent within three calendar days of draw down.

Q: Will HEERF emergency grants be counted as income for the calculation of Expected Family Contribution (EFC) or estimated financial assistance (EFA)?

A: No. Emergency financial aid grants made by a federal agency, State, Indian tribe, higher education institution or scholarship-granting organization (including a tribal organization) to a student because of an event related to the COVID-19 national emergency are not included in the student's gross income.

Q: How long does my institution have to spend our HEERF III funds?

A: Institutions generally must expend their HEERF grant funds within one year from the date when the Department processed the most recent obligation of funds for each specific grant. Thus, institutions that received a supplemental award under ARP

have one year to spend all remaining CRRSAA, CARES, and new ARP funds for each grant from the date their ARP supplemental award is made. The specific period of performance will be indicated in Box 6 of your institution's GAN.

Q: If I received funds through the CARES Act or the CRRSA Act do I need to do anything to receive my HEERF III allocation?

A: No, if your public or non-profit institution received funding through either the CARES or CRRSA Act you do not need to do anything to receive your institutions allocation.

To assist with management and oversight, proprietary institutions must first submit the Required Proprietary Institution Certification form signed by the proprietary institution's President or CEO and any owners with at least 25% ownership in the institution. Proprietary institutions must submit the form by August 11, 2021, as specified in the Federal Register. Once that certification document has been completed, institutions must email it to HEERFARP4@ed.gov.

Q: What are the reporting requirements for the HEERF III funds?

A: Institutions will be required to post the Quarterly Institutional Public Reporting Form and Quarterly Student Public Reporting Form for HEERF III funds to their websites by the tenth day following the end of each calendar quarter. ED acknowledges that because it never affirmatively established HEERF II reporting requirements, it is extending 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 III funds will also be subject to the annual reporting requirement in early 2022. Watch Today's News for more information on HEERF III reporting requirements.

Q: I haven't finished spending my HEERF I or HEERF II funds yet, do I still have to follow the specific rules for those funds or are they all compiled under HEERF III rules now?

A: All remaining HEERF funds, regardless of distributing programs, are now compiled under HEERF III rules.

ED specifies that the following previously-issued guidance applies in whole or in part to HEERF III, unless superseded by the text of the American Rescue Plan:

- [Lost Revenue FAQs](#) (issued on March 19, 2021)
- [CRRSAA HEERF II \(a\)\(1\) FAQs](#) (issued on January 14 and updated March 19, 2021)
- [CRRSAA HEERF II \(a\)\(4\) FAQs](#) (issued on January 14 and updated March 19, 2021)
- [HEERF CARES Act Rollup FAQs](#) (issued Oct. 14, 2020 and revised January 28, 2021)
- [HEERF Grant Program Auditing Requirements Letter](#) (issued on March 8, 2021)

Outstanding Questions

At the moment, the answers to the following questions remain unknown. NASFAA hopes to be able to address these questions in the near future and will update this reference page on a rolling basis as ED provides additional guidance.

Publication Date: 5/12/2021

