HEERF Implementation at Community Colleges

April 6, 2021

Keith Curry, President, Compton College, CA

Anne Kress, President, Northern Virginia Community College

Monty Sullivan, President, Louisiana Community and Technical College System

Dr. Walter G. Bumphus, AACC President and CEO

J. Noah Brown, ACCT President and CEO
WEBINAR TOPICS

- Welcome and Introductions
- HEERF Guidance and Implementation Issues
- Institutional Perspectives and Discussion
- Questions and Answers
AMERICAN RESCUE PLAN ACT (ARP)

- Signed Into Law by President Biden on March 11
- Passed Only With Democratic Votes
- Largely Followed Biden Proposal — $1.9 Trillion Overall Package
- $350 Billion for State and Local Governments
  - Includes tax cut prohibition
$170 Billion for Education Overall

- $39.6 Billion for Higher Education
- Largely Tracks CRRSAA Programs (Including 50% Headcount for Formula Grants)
  - Bill’s language limited because of reconciliation vehicle
- ~75% Increase from CRRSAA for Formula Grants, Titles III and V
- Half of ARP Institutional Funds Must be Spent on Student Grants
- State MOE Requirement Weaker Than CARES
- 90/10 (For-Profit) Rule Modified to Include GI Bill, etc., Under 90% Cap
ARP, CRRSAA, CARES Now Essentially One Program

Awards Supplemental to CARES, CRRSAA – No New Applications Required

Most CCs Have Now Received CRRSAA Notifications; ARP Expected Soon

NOTE: Colleges Must Draw Down Some Funds Within 90 Days of Notification for BOTH Student and Institutional Shares

Colleges Have 6 Months to Report to Secretary on Use of Funds; ED to Provide Format
HEA Titles III and V Received Continued Support; CRRSAA Allocations Announced

Funding Provided under Same Formula as Larger Grant Program (Pell, Enrollment), Except for HBCUs and TCUs

All Eligible Institutions to Receive Funding (MSI Eligibility Nullifies SIP)

Funding Would be Added to Main Formula Program $

No Student Spending Requirement
MARCH 19 ED GUIDANCE — MAJOR FEATURES

- Response to AACC-ACCT and Other Stakeholder Input
- ED Has Provided Substantial Flexibility for Student and Institutional Shares
- Restores 3/13/20 as Operative Date for HEERF Coverage – Major Improvement over Previous Guidance (i.e., 12/27/20)
- Defines Lost Revenue
- Reaffirms Multiple Institutional Options for Student Financial Grants
HEERF TIMETABLE/INSTITUTIONAL PLANNING AND SPENDING

- Colleges Likely Have One Year from ARP Notification to Use ALL HEERF Funds (No Final ED Position)
- Possibility of One-Year Extension upon Application; ED Quiet So Far on Conditions
- Congress Expects Support to be Made Available Without Undue Delay
- AACC/ACCT Message: MAKE A PLAN AND START USING FUNDS!
Can be Used 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, and Payroll)” — CRRSAA Language Carried into ARP

N.B.: ARP’s Exclusion of CRRSAA’s HEA Student Support Services Language

Some Expenditures Prohibited — e.g., Marketing/Recruitment, Athletic Facilities

Portion of funds must be used to monitor and suppress coronavirus and conduct outreach to notify financial aid recipients about possible adjustments to aid (PJ)

What is Not Prohibited is Potentially Allowable — Key is to Document Relationship of Expenditure to COVID

- This includes programs, services, institutional initiatives taken as a result of COVID
March 19 Guidance Provides a Variety of Examples for Claiming Lost Revenues as Expense

Includes Enrollment Drops as Requested by CCs, and a Variety of Other Revenue Sources

Numerous Institutional Options for Window of Comparison to Calculate Losses (Year-to-Year, Term-to-Term, 3-Year Period, 5-Year Period, Projected)
“Provide Financial Aid Grants to Students that May be Used for Any Component of a Student’s Cost of Attendance or for Emergency Costs” (COA Includes Tuition)

Institutions Shall “Prioritize Grants to Students with Exceptional Need, such as Students who Receive Pell Grants”

No Further Conditions, Giving Colleges Leeway to Disseminate Funds to Non-Title IV-Eligible Students, etc.

Non-Credit, Non-Degree, Dual Enrollment Students All Eligible for Grants—Major Plus for CCs and Different from CARES
Government Silent So Far on Undocumented, DREAM/DACA, International Students – Not Certain when Direction Will be Provided

Exceptional Need Criterion Should be Foundation of Student Grant Allocations; But Awards Can Extend Well Beyond Them

Exceptional Need Might be Identified Outside of Title IV (Loan Debt, Outstanding Balances, Use of College Services)

“Short-Term Pell” is a Clear Option

Colleges Are Encouraged to Use Institutional $ for Student Grants
Institution May Use Institutional Share to Cover Unpaid Balances if Student Was Enrolled on March 13, 2020 – Big Plus for CCs

Institutions May Issue Student Grant as Credit to Student’s Account

- Institution must receive student’s consent to apply any portion of the grant to outstanding balances on the account
- Institution does not need student consent if entire grant amount will go to the student (student account is merely a delivery vehicle)
INSTITUTIONAL PERSPECTIVES

- Dr. Keith Curry, President, Compton College, CA
- Dr. Anne Kress, President, Northern Virginia Community College
- Dr. Monty Sullivan, President, Louisiana Community and Technical College System
DISCUSSION OF INSTITUTIONAL POLICIES, PLANNING AND EXPENDITURE CONSIDERATIONS IN RE: HEERF

- Dr. Curry, Dr. Kress, and Dr. Sullivan with Dr. Bumphus, Noah Brown, David Baime, and Jee Hang Lee
QUESTIONS
CONTACT US!

- David Baime – dbaime@aacc.nche.edu
- Jee Hang Lee – jhlee@acct.org