



HEERF Implementation at Community Colleges

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WEBINAR TOPICS

- Welcome and Introductions
- American Rescue Plan Act Provisions
- 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

AMERICAN RESCUE PLAN ACT

- \$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

PRIMARY HIGHER EDUCATION FORMULA PROGRAM IMPLEMENTATION

- 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

CRRSAA/ARP — TITLES III AND V FUNDING

- 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 AACCC-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
- AACCT/ACCT Message: MAKE A PLAN AND START USING FUNDS!

FORMULA GRANTS – INSTITUTIONAL SHARE

- 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

FORMULA GRANTS — INSTITUTIONAL PORTION — LOST REVENUE

- 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*)

FORMULA GRANTS — STUDENT PORTION

- “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

FORMULA GRANTS — STUDENT PORTION

- 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

STUDENT FINANCING ISSUES

- 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!



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