Higher Education Emergency Relief Fund III (HEERF III)

ARP: American Rescue Plan

Emergency Financial Aid Grants to Students

University of Nebraska at Omaha Summary and Recommendations

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.

Funding: The amount of ARP (a)(1) funds that a public and private nonprofit institution must devote to financial aid grants to students is based on of the formula contained in section 314(a)(1) of the CRRSAA. Institutions are not responsible for performing this calculation. Rather, this minimum amount that institutions must spend on emergency financial aid grants to students has been calculated by the Department and is represented in the institution's ARP (a)(1) Student Aid Portion grant (ALN 84.425E) as well as on the ARP (a)(1) allocation table. As such, the allocation to be awarded for Emergency Financial Aid Grants to Students from HEERF III is \$15,955,981.

Since UNO received funding under the CRRSAA, the Department will make supplemental awards to our existing Student Aid Portion and Institutional Portion grants (Assistance Listing Numbers (ALNs) 84.425E and 84.425F). No action is required by the institution to receive these supplemental awards. The Project Director identified on the most current Grant Award Notification (GAN) will automatically receive an email indicating a supplement award is made to the institution. Drawing down any amount of these supplemented funds constitutes your institution's acceptance of the applicable terms and conditions under the ARP and as described in the Supplemental Agreements that will be emailed to the Project Director separately.

Requirements for making financial aid grants to students, which students are eligible to receive emergency financial aid grants:

As announced in the Department's final rule, "Eligibility To Receive Emergency Financial Aid Grants to Students Under HEERF" (May 14, 2021, 86 FR 26608) (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 provided the institution prioritizes exceptional need.

Undocumented students and international students may receive HEERF. 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 Arrival (DACA) recipients, other DREAMers, and similar undocumented students. International students may also receive HEERF. However, 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.

Requirements for making emergency financial aid grants to students:

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 and ARP explicitly state that emergency financial aid grants to students may be provided to students exclusively enrolled in distance education provided the institution prioritizes exceptional need.

The Department encourages institutions to prioritize domestic students, especially undergraduates, in allocating this funding. Domestic students include citizens, permanent 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).



How may students use their emergency financial aid grants:

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.

Important guidance from the Department of Education for distribution of funds:

- Higher Education Emergency Relief Fund III <u>Frequently Asked Questions</u>
- ARP Press Release
 - These grants will help over 5,000 institutions of higher education (institutions), including HBCUs, TCCUs, and HSIs, provide emergency financial aid to millions of students and ensure learning continues during the COVID-19 national emergency.
 - o "These funds are critical to ensuring that all of our nation's students particularly those disproportionately impacted by the COVID-19 pandemic have the opportunity to enroll, continue their education, graduate, and pursue their careers," said U.S. Secretary of Education Miguel Cardona. "With this action, thousands of institutions will be able to provide direct relief to students who need it most, so we can make sure that we not only recover from the pandemic, but also build back even stronger than before."
 - Today's announcement will enable institutions to equitably expand opportunity by targeting resources to all students with exceptional financial need. It also reflects ED's broader commitment to providing support, resources, and guidance to institutions, students, and communities throughout the pandemic.

Ways the funding can be used to have the greatest impact on students and communities include:

O Using emergency financial grants to support students with exceptional needs: While the pandemic has affected all students, it has hit some students and their families especially hard and has exacerbated inequities within our educational system. ED has released a final rule that allows institutions to provide emergency aid to all students. The ARP requires that institutions prioritize students with exceptional need, such as students who receive Pell Grants or undergraduates with extraordinary financial circumstances. ED's guidance clarifies that institutions can consider a variety of factors when assessing need, such as a student's eligibility for other federal or state need-based aid, significant unexpected expenses, loss of employment, reduced income, or food or housing insecurity. Institutions can also consider the needs of students who did not complete a Free Application for Federal Student Aid (FAFSA). For more details about student eligibility requirements, please see the final rule here and additional guidance here.



RECOMMENDATIONS FOR DISTRIBUTION OF EMERGENCY FINANCIAL AID GRANTS TO STUDENTS

METHOD	AMOUNT	Use of Funds	Selection
Distribution methodology – prorated by enrollment level Undergraduate Pell grant eligible EFC 0-5846 Grant amount per enrollment level: Full-time \$2,800 3/4 time \$2,100 1/2 time \$1,400	\$9,508,100	Financial aid grants for students may be used 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. Eligible students can also use the financial aid grants to satisfy an outstanding account balance with written (or electronic), affirmative consent. This consent is built into the online form.	Financial Support & Scholarships will identify eligible undergraduate students who meet DoED requirements with the greatest financial need. EFC 0 to 5846. This range includes 4,080 undergraduate, Pell grant eligible students. Financial Support & Scholarships will communicate to these students the availability of emergency financial aid grants. Eligible students must complete and submit a Simple "Opt-In" application (online form) indicating they either do or do not have eligible expenses, and the type of eligible expenses.
*Spring 2022 – Supplemental awards Distribution methodology Undergraduate Pell grant eligible EFC 0-5846 *Funding from Fall 2021 was not completely distributed as students either declined the award or did not complete the application. This funding was distributed in Spring 2022. Grant amount – \$850	\$3,207,607	Financial aid grants for students may be used 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. Eligible students can also use the financial aid grants to satisfy an outstanding account balance with written (or electronic), affirmative consent. This consent is built into the online form.	Financial Support & Scholarships will identify eligible undergraduate students who meet DoED requirements with the greatest financial need. EFC 0 to 5846. This range includes 3,852 undergraduate, Pell grant eligible students. Financial Support & Scholarships will communicate to these students the availability of emergency financial aid grants. Eligible students must complete and submit a Simple "Opt-In" application (online form) indicating they either do or do not have eligible expenses, and the type of eligible expenses.







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Distribution methodology – prorated by enrollment level Undergraduate Non-Pell grant eligible EFC 5847 – 19999 Grant amount per enrollment level: Full-time \$1,500 3/4 time \$1,125 1/2 time \$750	\$2,014,875	Financial aid grants for students may be used 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. Eligible students can also use the financial aid grants to satisfy an outstanding account balance with written (or electronic), affirmative consent. This consent is built into the online form.	Financial Support & Scholarships will identify eligible undergraduate students who meet DoED requirements with the greatest financial need. EFC 5847 to 19999. This range includes 1,958 students. Financial Support & Scholarships will communicate to these students the availability of emergency financial aid grants. Eligible students must complete and submit a Simple "Opt-In" application (online form) indicating either they do not have eligible expenses, and the type of eligible expenses.
Distribution methodology – prorated by enrollment level Graduate and Post-Baccalaureate EFC 0 – 19999 Grant amount per enrollment level: Full-time \$1,500 3/4 time \$1,125 1/2 time \$750	\$847,500	Financial aid grants for students may be used 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. Eligible students can also use the financial aid grants to satisfy an outstanding account balance with written (or electronic), affirmative consent. This consent is built into the online form.	Financial Support & Scholarships will identify eligible students who meet DoED requirements (Post-Baccalaureate and Graduate) with the greatest financial need. EFC 0 to 19999. This range includes 796 students. Financial Support & Scholarships will communicate to these students the availability of emergency financial aid grants. Eligible students must complete and submit a Simple "Opt-In" application (online form) indicating either they do not have eligible expenses, and the type of eligible expenses.



Assistance Application Non-Title IV eligible This category is specifically designed for undocumented and international students who have faced significant unexpected expenses	recosts that corporation, food, ealth care mental health ild care. dents can e financial aid atisfy an 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 Arrival (DACA) recipients, other DREAMers, and similar undocumented students may also receive HEERF.
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The amount of funds in each category and number of students are estimates and may vary when funds are distributed.

