

Higher Education Emergency Relief Fund

Emergency Financial Aid Grants to Students under Section 18004 of the Coronavirus Aid, Relief, and Economic Security (CARES) Act

University of Nebraska at Omaha Summary and Recommendations

The CARES Act, which establishes and funds the Higher Education Emergency Relief Fund (HEERF), directs institutions of higher education to use no less than 50 percent of funds received under Sections 18004(a)(1) and 18004(c) of the CARES Act to provide emergency financial aid grants to students for expenses related to the disruption of campus operations due to coronavirus

Funding: The University of Nebraska at Omaha's Total Allocation for Section 18004(a)(1) of the CARES Act is \$10,759,273. The minimum allocation to be awarded for Emergency Financial Aid Grants to Students is \$5,379,637. The CARES Act explicitly states that institutions of higher education shall use "no less than 50 percent of such funds to provide emergency financial aid grants to students for expenses related to the disruption of campus operations due to coronavirus (including eligible expenses under a student's cost of attendance, such as food, housing, course materials, technology, health care, and child care)".

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

- **The CARES Act** requires institutions to use no less than 50 percent of HEERF funds received under Sections 18004(a)(1) and 18004(c) of the CARES Act to provide emergency financial aid grants to students.
- **Section 2 of the Funding Certification and Agreement** for the Emergency Financial Aid Grants to Students states: "Recipient shall not use [these] funds to reimburse itself for any costs or expenses, including but not limited to any costs associated with significant changes to the delivery of instruction due to the coronavirus and/or any refunds or other benefits that Recipient previously issued to students."
- **April 21, 2020 guidance DoED Q&A** - The institution may not use emergency financial aid grants to students to satisfy a student's outstanding account balance. The disbursement of the emergency financial aid grant to the student must remain unencumbered by the institution; debts, charges, fees, or other amounts owed to the institution may not be deducted from the emergency financial aid grant.
- **April 21, 2020 guidance DoED Q&A** - Only students who are or could be eligible to participate in programs under Section 484 in Title IV of the Higher Education Act of 1965, as amended (HEA), may receive emergency financial aid grants. If a student has filed a Free Application for Federal Student Aid (FAFSA), then the student has demonstrated eligibility to participate in programs under Section 484 the HEA. While this guidance states that a FAFSA is not required, having one on file would be the only practicable way for an institution to determine that a student is eligible to participate in the student aid programs and meet all applicable eligibility requirements. By stating that only Title IV eligible students would be able to receive emergency grants, the guidance also excluded international students and those in the Deferred Action for Childhood Arrivals (DACA) program from receiving emergency funding.
- **April 21, 2020 guidance DoED Q&A** - institutions that provide both online and ground-based education, those students who were enrolled exclusively in an online program on March 13, 2020, the date of the President's Proclamation, "Declaring a National Emergency Concerning the Novel

Coronavirus Disease (COVID-19) Outbreak,” Federal Register Vol. 85, No. 53 at 15337- 38, are not eligible for emergency financial aid grants.

- **Secretary’s letter to college and university presidents** - The CARES Act provides institutions with significant discretion on how to award this emergency assistance to students. This means that each institution may develop its own system and process for determining how to allocate these funds, which may include distributing the funds to all students or only to students who demonstrate significant need.
- **Secretary’s letter to college and university presidents** - The only statutory requirement is that the funds be used to cover expenses related to the disruption of campus operations due to coronavirus (including eligible expenses under a student’s cost of attendance, such as food, housing, course materials, technology, health care, and child care).
- **Secretary’s letter to college and university presidents** - encourage the leadership of each institution to prioritize your students with the greatest need, but at the same time consider establishing a maximum funding threshold for each student to ensure that these funds are distributed as widely as possible. As a point of reference, you might consider using the maximum Federal Pell grant (for the 2019-2020 academic year, \$6,195) as that threshold.
- **Funding Certification and Agreement** – Agree to provide emergency financial aid grants to students for expenses related to the disruption of campus operations due to coronavirus (including eligible expenses under a student’s cost of attendance such as food, housing, course materials, technology, health care, and child care).
- **Funding Certification and Agreement** - Recipient retains discretion to determine the amount of each individual emergency financial aid grant consistent with all applicable laws including non-discrimination laws. Recipient acknowledges that the Secretary recommends the maximum Federal Pell Grant for the applicable award year as an appropriate maximum amount for a student’s emergency financial aid grant in most cases, and the Recipient should be mindful of each student’s particular socioeconomic circumstances in the staging and administration of these grants.
- **April 3, 2020 guidance – Need Analysis** Any 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.

Department of Education References:

[Coronavirus Aid, Relief, and Economic Security \(CARES\) Act](#)

[Letter to College and University Presidents on CARES Act Funding](#)

April 3, 2020: [ED UPDATED Guidance for Interruptions of Study Related to Coronavirus \(COVID-19\)](#)

April 9, 2020: U.S. Department of Education (ED) [announcement](#)

[CARES Act Institutional Allocations from Department of Education](#)

[CARES Act Higher Education Emergency Relief Fund Certification Agreement Form](#)

April 21, 2020: [Frequently Asked Questions about the Emergency Financial Aid Grants to Students](#)

ED website at ed.gov/coronavirus.

**RECOMMENDATIONS FOR DISTRIBUTION OF
EMERGENCY FINANCIAL AID GRANTS TO STUDENTS**

METHOD	AMOUNT	Use of Funds	Selection
Distribution methodology	\$4,841,673	Expenses related to the disruption of campus operations due to coronavirus (including eligible expenses under a student's cost of attendance, such as food, housing, course materials, technology, health care, and child care).	<p>Financial Support & Scholarships will identify Title IV eligible students who meet DoED requirements (undergraduate and graduate) with the greatest financial need.</p> <p>EFC 0 to 10000. This range includes 4,784 students, included 546 graduate students.</p> <p>Financial Support & Scholarships will communicate to these students the availability of emergency financial aid grants.</p> <p>Eligible students must complete and submit a Simple "Opt-In" application (online form)</p> <p>Grant amount: \$1200 per eligible student</p>
Emergency Assistance Application	\$537,964	Same as above, but for students with more extreme financial emergencies related to COVID-19	<p>Applicants must be Title IV eligible students who meet DoED requirements (undergraduate and graduate)</p> <p>Must have financial need</p> <p>Application process with review by Hardship Committee.</p> <p>Award Amount: variable</p>
TOTAL	\$5,379,637		

Reporting - UNO will be required to report to the Secretary 30 days from the Certification and Agreement and every 45 days after. This report shall include:

- how the grants were distributed to students,
- the amount awarded to each student,
- how the grant amount was calculated and
- any directions given to the students about the grant.

UNO must demonstrate that it has continued to pay all of its employees and contractors during the period of any disruptions or closures to the greatest extent practicable explaining in detail all specific actions and decisions related thereto, in compliance with Section 18006 of the CARES Act.