



DEPARTMENT OF EDUCATION



Higher Education Emergency Relief Fund (HEERF)

**(a)(2) Construction, Renovation,
& Real Property Projects
Technical Assistance Webinar**

JUNE 2022


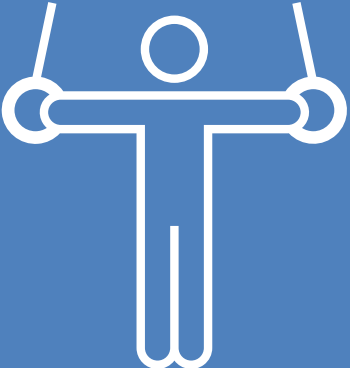

Presented by:

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Monique Hart
Katrina Jackson

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OVERVIEW of KEY POINTS

 OVERVIEW	 (a)(2) FLEXIBILITIES	 GRANTEE ELIGIBILITY
<p>The HEERF (a)(2) new allowances were signed into law on March 15, 2022.</p> <p>Under the statute, institutions may only use their HEERF (a)(2) funds received under all three HEERF laws (CARES, CRRSAA & ARP).</p>	<p>New flexibilities and requirements allow HEERF (a)(2) institutions to use grant funds towards construction, renovation, and real property projects.</p>	<ul style="list-style-type: none">✓ Historically Black Colleges & Universities✓ Tribally Controlled Colleges & Universities✓ Minority Serving Institutions✓ Strengthening Institutions Program <p>SAIHE (a)(3) SSARP (a)(3) PROPRIETARY (a)(4)</p>

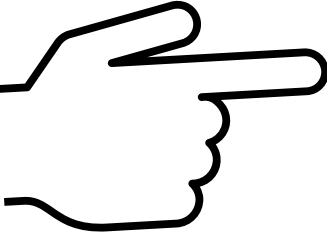
**OVERVIEW of
KEY POINTS**

Grantees must articulate the nexus between HEERF (a)(2) projects and **preventing, preparing, or responding** to COVID-19



Examples of **ALLOWABLE** Expansion & Remodeling Uses

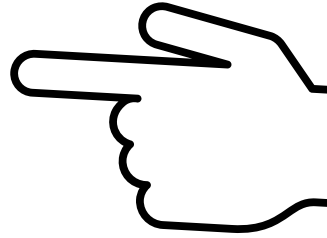
- ✓ Dorm facilities
- ✓ Campus-based childcare facilities
- ✓ COVID-19 vaccination/ testing site(s)
- ✓ Campus-based food pantries
- ✓ Remodeling of campus buildings or new building construction to improve ventilation and social distancing



(a)(2) Grantees must receive prior approval for all projects. Institutions may not begin the contractual bidding or actual construction or renovation prior to the Department's approval.

- ✓ Modular buildings
- ✓ Developing broadband and wi-fi infrastructure
- ✓ Constructing wellness or meditative spaces
- ✓ Purchasing real property
- ✓ “Reasonable and necessary” pre-planning costs which can include:
 - *Hiring an architect*
 - *Getting an appraisal*

(a)(2) Grantees must articulate the nexus between their project and preventing, preparing, or responding to COVID-19.



Examples of **ALLOWABLE EXCEPTIONS**

Expansion & Remodeling Uses



(a)(2) Grantees **MUST** revise quarterly and annual reports to reflect the “repurpose” of (a)(2) funds **AND** repost revised reports to institutional website.

Repurposing (a)(1) funds calls for additional auditing requirements and documentation.

Source: (a)(2) Construction, Renovation & Real Property FAQ – Question 24 (pg. 11).



UNALLOWABLE

The usage of HEERF (a)(1) Student Portion, Institutional Portion, (a)(3) and/or (a)(4) grant funds is deemed unallowable.

The usage of “**repurposed**” HEERF (a)(1) funds can support (a)(2) construction, renovation, or real property projects if **grantees spend an equal (or lesser) dollar amount than previously spent to support (a)(2) activities**. Repurposing (a)(1) funds calls for additional auditing requirements and documentation.



ALLOWABLE

Examples of **ALLOWABLE EXCEPTIONS**

Expansion & Remodeling Uses



Grantees must carefully document **how** the institution calculated the portion of costs attributable to the ASRMR-related construction or renovation project.

Source: (a)(2) Construction, Renovation & Real Property FAQ – Question # 13 - 15 (pg. 7 & 8).



UNALLOWABLE

The usage of HEERF funds to support facilities associated with athletics, sectarian instruction, religious worship, or marketing and recruitment (ASRMR) is deemed **unallowable**.

(a)(2) Grantees with plans to include an ASRMR space must separately account for the cost of ASRMR projects by **subtracting the square footage of the ASRMR-related expenses from the proposed construction or renovation project**. Grantees must carefully document ASRMR-related construction or renovation expenses.



ALLOWABLE

Examples of **ALLOWABLE EXCEPTIONS** Expansion & Remodeling Uses



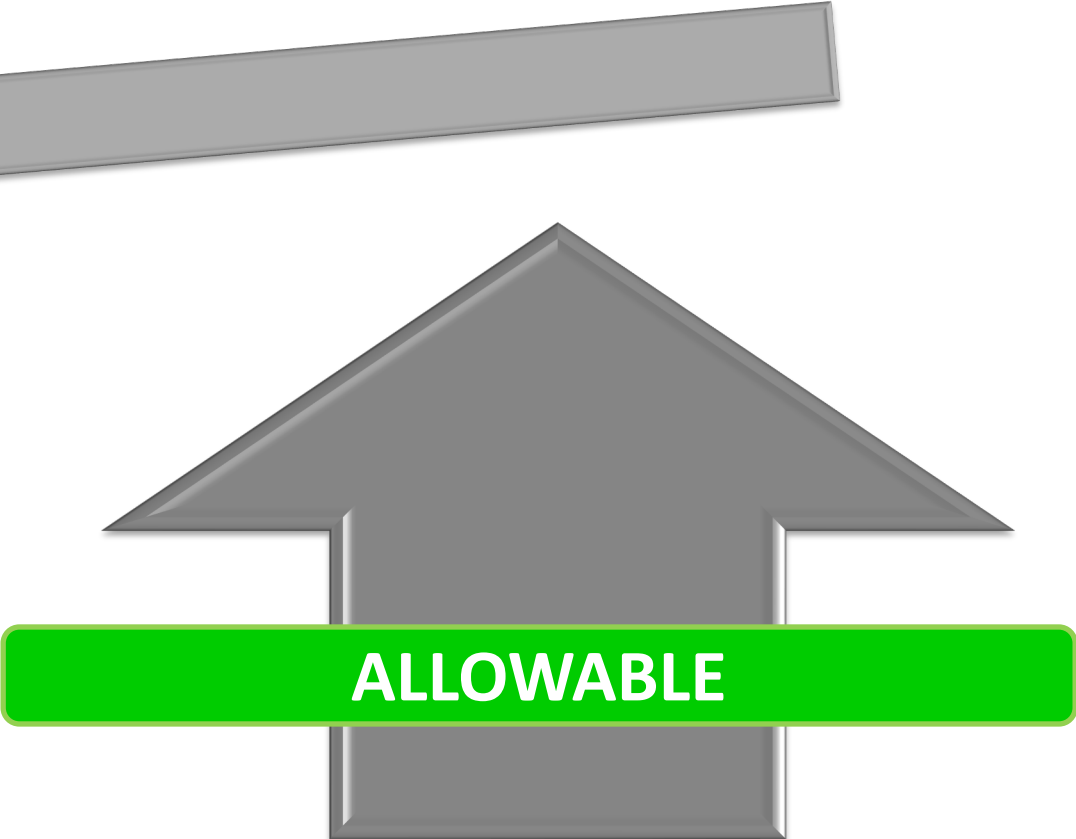
(a)(2) Grantees that have already initiated a contractual bidding for construction and/or renovation projects can not support the project using HEERF (a)(2) funds.

Source: (a)(2) Construction, Renovation & Real Property FAQ – Question # 12 (pg. 7).



UNALLOWABLE

The usage of HEERF funds to support construction, renovation or real property expenditures that occurred before March 15, 2022, is deemed unallowable.



Conceptualized or planned construction, renovation or real property projects — **without construction activity (advertised or placed on the market for bidding)** prior to the date of the passage of the Consolidated Appropriations Act, 2022 (March 15, 2022) — is deemed allowable.

ALLOWABLE

Three Required Documents

(a)(2) Grantees are required to complete and submit the following documents.

1

**(a)(2) Prior
Approval Form**

2

ED 524 Form

3

SF 424D Form

1

(a)(2) PRIOR APPROVAL FORM

BLANK

OMB Control Number: 1840-0861
Expiration Date: 11/30/2022

Higher Education Emergency Relief Fund (HEERF)
(a)(2) Construction, Renovation, and Real Property Projects
Prior Approval Request Form

Institution Name and Address:		Date:
HEERF (a)(2) Award Number: P425	Please select the Project Type:	
Available Balance:	<input type="checkbox"/> Renovation	
Grant Award Total:	<input type="checkbox"/> Construction	
	<input type="checkbox"/> Acquisition of Real Property	
State Director:	Authorizing Official:	
Institution Type:	Check to Confirm Required Forms are Attached: ¹	
<input type="checkbox"/> 2-year <input type="checkbox"/> 4-year	<input type="checkbox"/> ED 524 Form <input type="checkbox"/> SF 424D Form	
<input type="checkbox"/> Public <input type="checkbox"/> Private-Non-profit		
Proposed Project Title:	Proposed Project Timeline (start and end dates):	

PRIOR APPROVAL INFORMATION
1. Provide a brief description of proposed project (as applicable, include type of space, square footage, etc.):
2. Describe how the project is directly related to preventing, preparing for, or responding to the coronavirus (ED may request additional documentation):

¹ Request will be rejected if "no" is checked or required forms are not included.

3. Provide a brief budget narrative to clarify financials noted on the 524 Form (Please note any funds used from HEA Title III and/or Title V grant awards or any additional sources):

ADDITIONAL ASSURANCES	Y / N	NOTES
4. The proposed construction or renovation is necessary and reasonable under the Cost Principles of the Uniform Guidance in 2 CFR part 200 subpart E .	<input type="checkbox"/> Y <input type="checkbox"/> N	
5. The construction or renovation of facilities is functional, economical, and not elaborate in design or extravagant compared with facilities of a similar type constructed in the State or other applicable geographic area (34 CFR § 75.607).	<input type="checkbox"/> Y <input type="checkbox"/> N	
6. The construction or renovation will NOT support capital outlays associated with athletics, sectarian instruction, religious worship, or marketing activities.	<input type="checkbox"/> Y <input type="checkbox"/> N	
7. The construction or renovation will comply with safety and health standards, including those under the Occupational Safety and Health Act of 1970 or State and local codes to the extent they are more stringent (34 CFR § 75.609).	<input type="checkbox"/> Y <input type="checkbox"/> N	
8. This prior approval request is not for a recently constructed or renovated building, or for a project that has already begun contractual bidding or actual construction or renovation (34 CFR § 75.605).	<input type="checkbox"/> Y <input type="checkbox"/> N	

ADDITIONAL COMMENTS / INFORMATION	
FOR INTERNAL USE ONLY	
PROJECT STATUS: <input type="checkbox"/> APPROVED <input type="checkbox"/> DENIED	PROJECT NO:
JUSTIFICATION (Briefly state the rationale for the determination rendered):	HEERF PROGRAM SPECIALIST INITIALS:

1

(a)(2) PRIOR APPROVAL FORM

EXAMPLE

PAGE 1

OMB Control Number: 1840-0861
Expiration Date: 11/30/2022

Higher Education Emergency Relief Fund (HEERF)
(a)(2) Construction, Renovation, and Real Property Projects
Prior Approval Request Form

Institution Name and Address: University Q		Date: 6/24/22
HEERF (a)(2) Award Number: P425 J200550	Please select the Project Type:	
Available Balance: \$500,000	<input checked="" type="checkbox"/> Renovation	
Grant Award Total: \$5,250,465	<input type="checkbox"/> Construction	
	<input type="checkbox"/> Acquisition of Real Property	
State Director: Jordan Coleman	Authorizing Official: Kensington Holmes	
Institution Type: <input type="checkbox"/> 2-year <input checked="" type="checkbox"/> 4-year <input checked="" type="checkbox"/> Public <input type="checkbox"/> Private-Non-profit	Check to Confirm Required Forms are Attached: ¹ <input checked="" type="checkbox"/> ED 524 Form <input checked="" type="checkbox"/> SF 424D Form	
Proposed Project Title: Hickman Eby Wellness Center	Proposed Project Timeline (start and end dates): 08/01/2022 - 11/30/2023	

PRIOR APPROVAL INFORMATION

1. Provide a brief description of proposed project (as applicable, include type of space, square footage, etc.):

University Q will construct a comprehensive mental health and wellness facility to meet the ongoing needs of students and faculty. The center will be housed in a former dormitory, which has been vacant due to the condition of the building. Within the existing site, UQ will create counseling suites, individual and group nap spaces, and a meditation courtyard garden.

2. Describe how the project is directly related to preventing, preparing for, or responding to the coronavirus (ED may request additional documentation):

The COVID-19 pandemic introduced heightened levels of anxiety and stress, isolated individuals from social and familial networks, and exasperated existing mental health conditions. University Q will prioritize student, faculty, and community well-being by centralizing resources in the Eby Hickman Center, which will house multiple spaces for individual and group activities with the purpose of reducing incidence and risk for loneliness, depression, harmful alcohol and drug use,

¹ Request will be rejected if "no" is checked or required forms are not included.

1

(a)(2) PRIOR APPROVAL FORM

EXAMPLE

PAGE 2

3. Provide a brief budget narrative to clarify financials noted on the 524 Form *(Please note any funds used from HEA Title III and/or Title V grant awards or any additional sources):*

Costs detailed on the ED-524 are directly associated with construction required to remodel the former dormitory into the new Hickman Eby Wellness Center. In addition to the \$500,000 of remaining HEERF (a)(2) funds, UQ will utilize a \$25,000 grant for landscaping materials.


ADDITIONAL ASSURANCES	Y / N	NOTES
4. The proposed construction or renovation is necessary and reasonable under the Cost Principles of the Uniform Guidance in 2 CFR part 200 subpart E .	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	
5. The construction or renovation of facilities is functional, economical, and not elaborate in design or extravagant compared with facilities of a similar type constructed in the State or other applicable geographic area (34 CFR § 75.607).	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	
6. The construction or renovation will NOT support capital outlays associated with athletics, sectarian instruction, religious worship, or marketing activities.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	
7. The construction or renovation will comply with safety and health standards, including those under the Occupational Safety and Health Act of 1970 or State and local codes to the extent they are more stringent (34 CFR § 75.609).	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	
8. This prior approval request is not for a recently constructed or renovated building, or for a project that has already begun contractual bidding or actual construction or renovation (34 CFR § 75.605).	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	

ADDITIONAL COMMENTS / INFORMATION

Costs excludes construction expenses related to renovation of 2000 square feet on the ground floor of the dormitory, which will house a student cardiovascular exercise space.

FOR INTERNAL USE ONLY

PROJECT STATUS: <input checked="" type="checkbox"/> APPROVED <input type="checkbox"/> DENIED	PROJECT NO: 1 of 2
JUSTIFICATION (Briefly state the rationale for the determination rendered):	HEERF PROGRAM SPECIALIST INITIALS: WMK

	U.S. DEPARTMENT OF EDUCATION BUDGET INFORMATION NON-CONSTRUCTION PROGRAMS	OMB Control Number: 1894-0008 Expiration Date: 09/30/2023						
Name of Applicant Organization		Applicants requesting funding for only one year should complete the column under "Project Year 1." Applicants requesting funding for multi-year grants should complete all applicable columns. Please read all instructions before completing form.						
SECTION A - BUDGET SUMMARY U.S. DEPARTMENT OF EDUCATION FUNDS								
Budget Categories	Project Year 1 (a)	Project Year 2 (b)	Project Year 3 (c)	Project Year 4 (d)	Project Year 5 (e)	Project Year 6 (f)	Project Year 7 (g)	Total (h)
1. Personnel								
2. Fringe Benefits								
3. Travel								
4. Equipment								
5. Supplies								
6. Contractual								
7. Construction								
8. Other								
9. Total Direct Costs (lines 1-8)								
10. Indirect Costs *Enter Rate Applied:								
11. Training Stipends								
12. Total Costs (lines 9-11)								
<p>*Indirect Cost Information (To Be Completed by Your Business Office):</p> <p>If you are requesting reimbursement for indirect costs on line 10, please answer the following questions:</p> <p>(1) Do you have an Indirect Cost Rate Agreement approved by the Federal government? <input type="checkbox"/> Yes <input type="checkbox"/> No.</p> <p>(2) If yes, please provide the following information and provide a copy of your Indirect Cost Rate Agreement: Period Covered by the Indirect Cost Rate Agreement: From: ___/___/___ To: ___/___/___ (mm/dd/yyyy) Approving Federal agency: ___ ED ___ Other (please specify): _____ The Indirect Cost Rate is _____ %</p> <p>(3) If this is your first Federal grant, and you do not have an approved indirect cost rate agreement, are not a State, Local government or Indian Tribe, and are not funded under a training rate program or a restricted rate program, do you want to use the de minimis rate of 10% of MTDC? <input type="checkbox"/> Yes <input type="checkbox"/> No. If yes, you must comply with the requirements of 2 CFR § 200.414(f).</p> <p>(4) If you do not have an approved indirect cost rate agreement, do you want to use the temporary rate of 10% of budgeted salaries and wages? <input type="checkbox"/> Yes <input type="checkbox"/> No. If yes, you must submit a proposed indirect cost rate agreement within 90 days after the date your grant is awarded, as required by 34 CFR § 75.560.</p> <p>(5) For Restricted Rate Programs (check one) -- Are you using a restricted indirect cost rate that: <input type="checkbox"/> Is included in your approved Indirect Cost Rate Agreement? Or <input type="checkbox"/> Complies with 34 CFR 76.564(c)(2)? The Restricted Indirect Cost Rate is _____ %</p> <p>(6) For Training Rate Programs (check one) -- Are you using a rate that: <input type="checkbox"/> Is based on the training rate of 8 percent of MTDC (See EDGAR § 75.562(c)(4))? Or <input type="checkbox"/> Is included in your approved Indirect Cost Rate Agreement, because it is lower than the training rate of 8 percent of MTDC (See EDGAR § 75.562(c)(4)).</p>								

ED 524 FORM

EXAMPLE

U.S. DEPARTMENT OF EDUCATION BUDGET INFORMATION NON-CONSTRUCTION PROGRAMS							OMB Control Number: 1894-0008 Expiration Date: 09/30/2023	
Name of Applicant Organization <i>Sunshine College & University</i>						Applicants requesting funding for only one year should complete the column under "Project Year 1." Applicants requesting funding for multi-year grants should complete all applicable columns. Please read all instructions before completing form.		
SECTION A - BUDGET SUMMARY U.S. DEPARTMENT OF EDUCATION FUNDS								
Budget Categories	Project Year 1 (2022)	Project Year 2 (2023)	Project Year 3 (2024)	Project Year 4 (d)	Project Year 5 (e)	Project Year 6 (f)	Project Year 7 (g)	Total (h)
1. Personnel (ex. PM)								
2. Fringe Benefits								
3. Travel								
4. Equipment	\$5,000							
5. Supplies (ex. concrete, bricks, paint, tape, tools)	\$1,500							
6. Contractual								
7. Construction (ex. construction, renovation, improvements to classrooms, libraries, laboratories, and other instructional facilities, including purchase of telecommunications technology equipment)	\$3,500							
8. Other								
9. Total Direct Costs (lines 1-8)	\$10,000							
10. Indirect Costs *Enter Rate Applied:								
11. Training Stipends								
12. Total Costs (lines 9-11)	\$10,000							

3

SF 424D FORM

**SIGNATURE
REQUIRED**

View Burden Statement ASSURANCES - CONSTRUCTION PROGRAMS OMB Number: 4040-0009
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

- Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
- Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
- Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
- Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
- Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
- Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
- Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
- Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
- Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
- Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1688), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-816), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

Previous Edition Usable Authorized for Local Reproduction Standard Form 424D (Rev. 7-97)
Prescribed by OMB Circular A-102

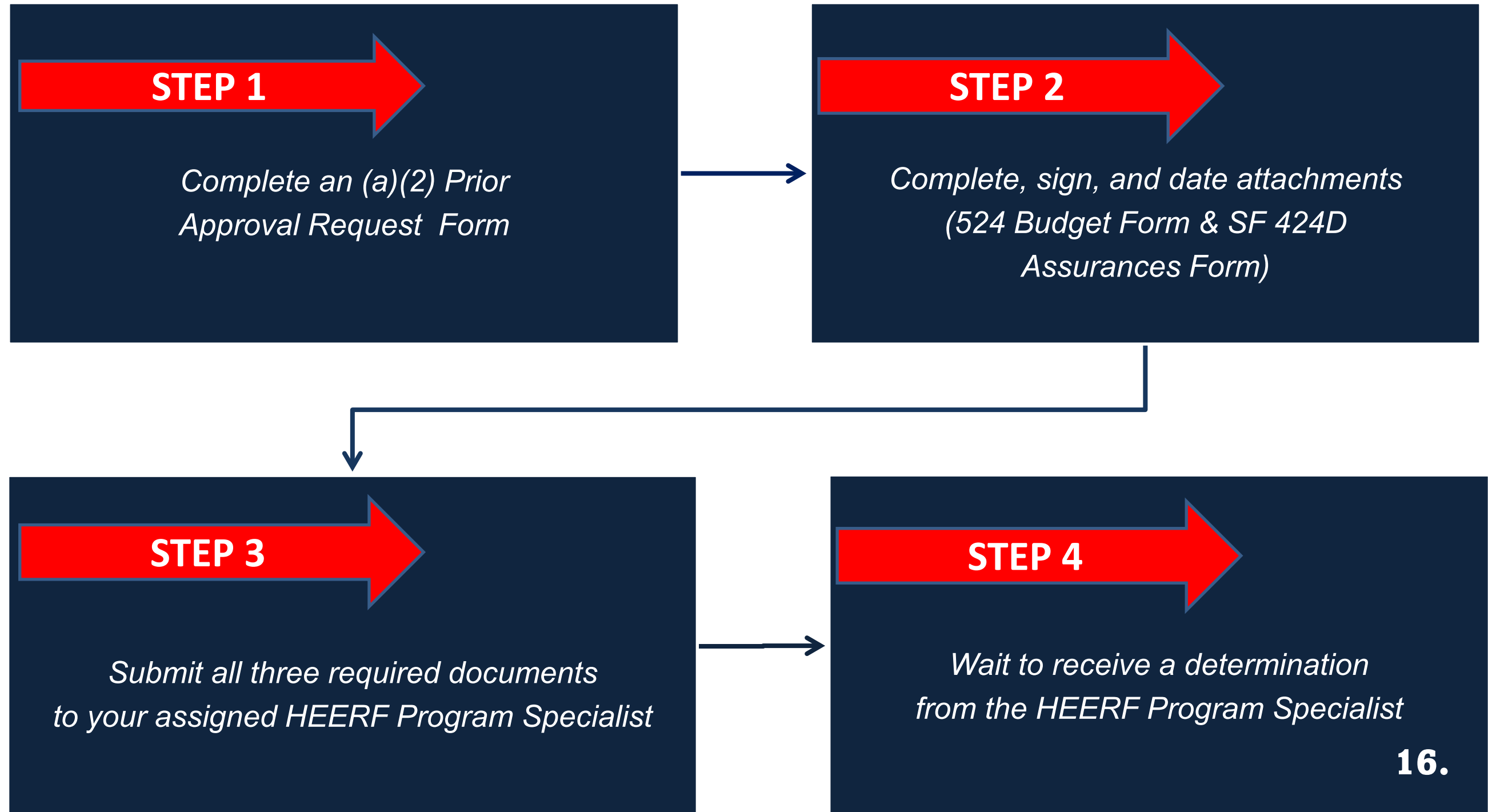
- Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-648) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
- Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
- Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
- Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
- Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
- Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
- Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
- Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
- Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
- Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
<input type="text"/>	<input type="text"/>
APPLICANT ORGANIZATION	DATE SUBMITTED
<input type="text"/>	<input type="text"/>

SF-424D (Rev. 7-97) Back

**REQUIRED
APPROVAL
FORMS &
SUBMISSION
PROCESS**

Submission Process



(a)(2) REPORTING REQUIREMENTS

Reporting

(a)(2) Grantees must report construction, renovation, or real property expenditures on the 2022 HEERF Annual Report (due in early 2023).

The Department will add a construction, renovation, and real property category to the HEERF quarterly report **beginning with the report due on July 10, 2022.**

The Emergency Response Unit will host a webinar to present a revised HEERF reporting template on **June 21, 2022.**

*****SAVE THE DATE: JUNE 21, 2022*****

NEW HEERF REPORTING TEMPLATE WEBINAR

(a)(2) REPORTING REQUIREMENTS



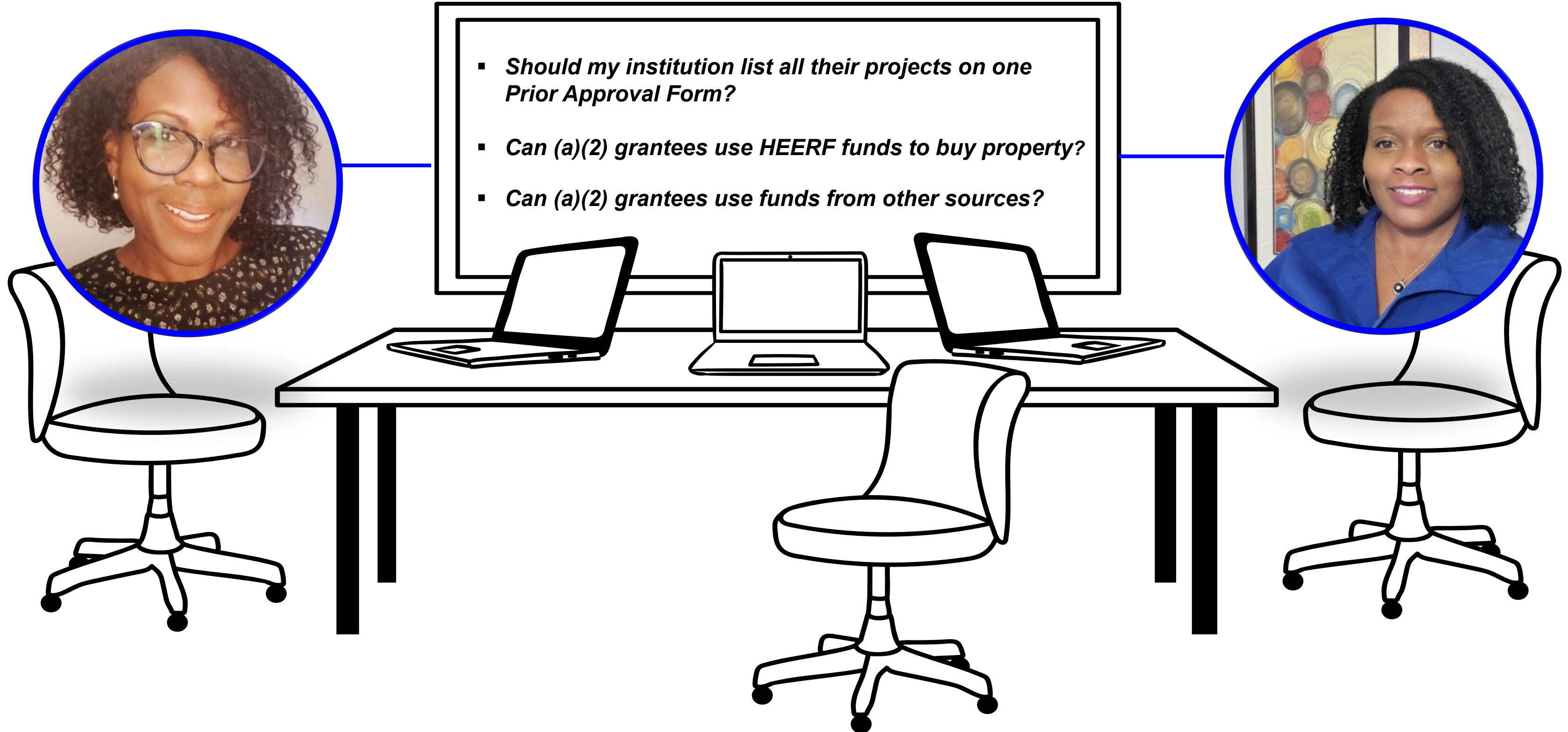
Reporting

- ✓ Financial records
- ✓ Strategic plans
- ✓ Environmental assessments
- ✓ Calculations to justify allowable exceptions
- ✓ Contract bids (solicitations)
- ✓ Revised quarterly & annual reports

Activity: Things that make you go... Hmmmm

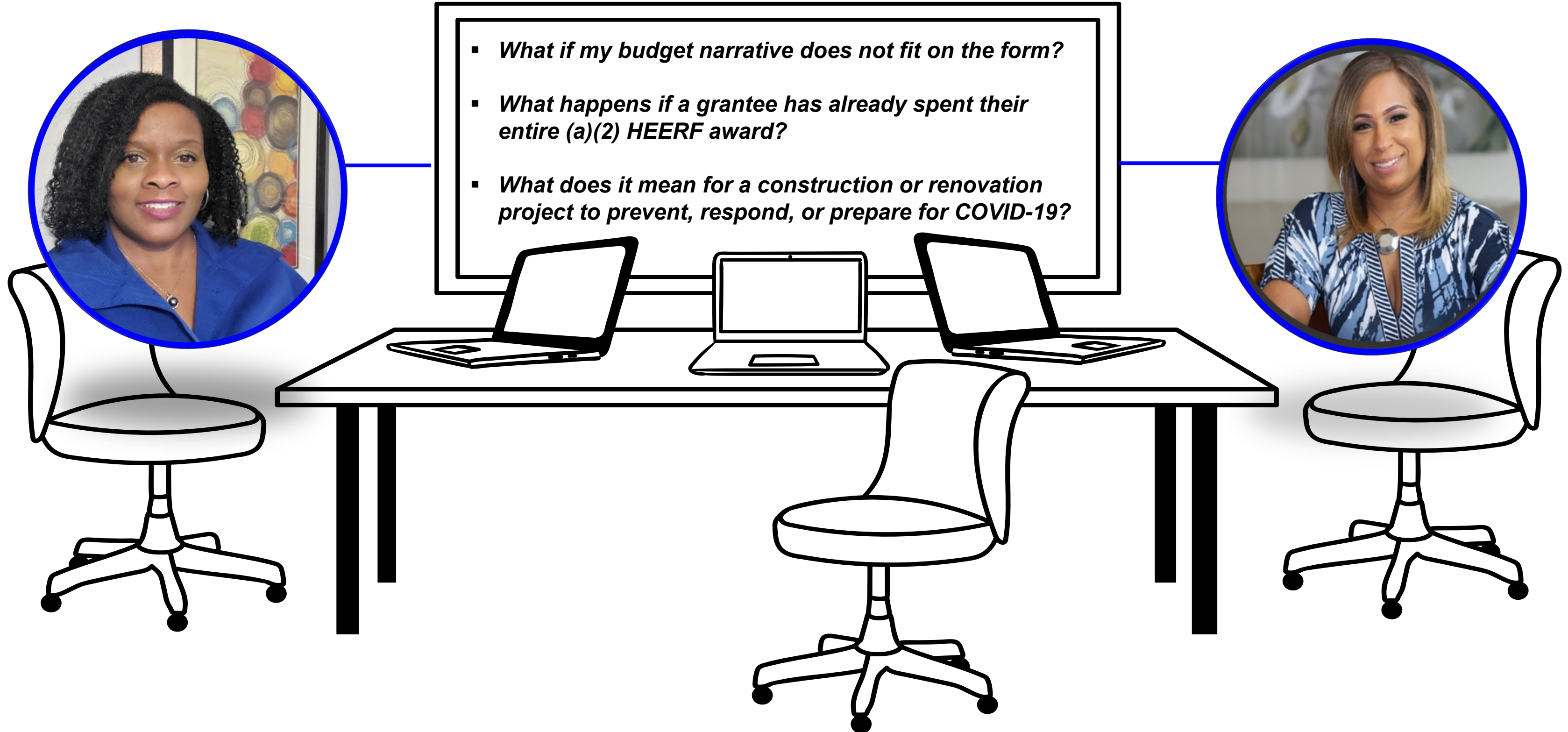


Activity: Things that make you go... Hmmm



- *Should my institution list all their projects on one Prior Approval Form?*
- *Can (a)(2) grantees use HEERF funds to buy property?*
- *Can (a)(2) grantees use funds from other sources?*

Activity: Things that make you go... Hmmmmm



- *What if my budget narrative does not fit on the form?*
- *What happens if a grantee has already spent their entire (a)(2) HEERF award?*
- *What does it mean for a construction or renovation project to prevent, respond, or prepare for COVID-19?*

Activity: Things that make you go... HmMMM



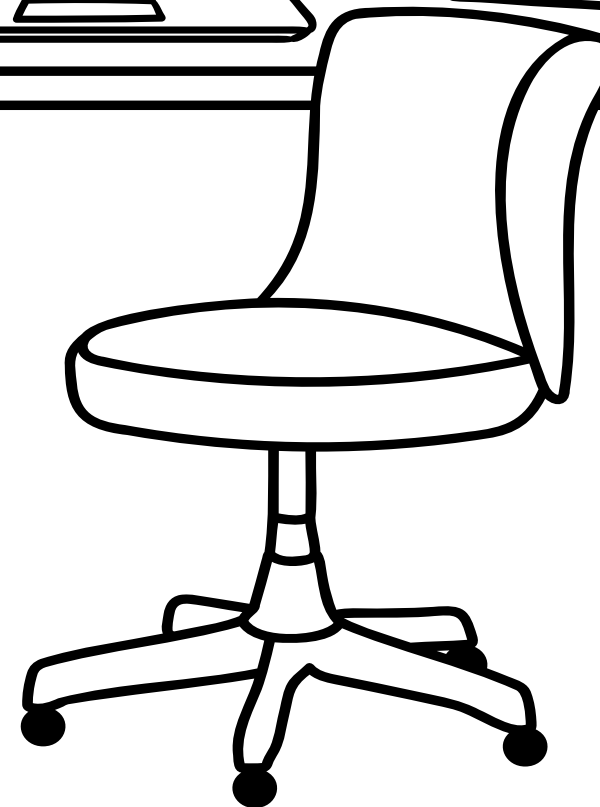
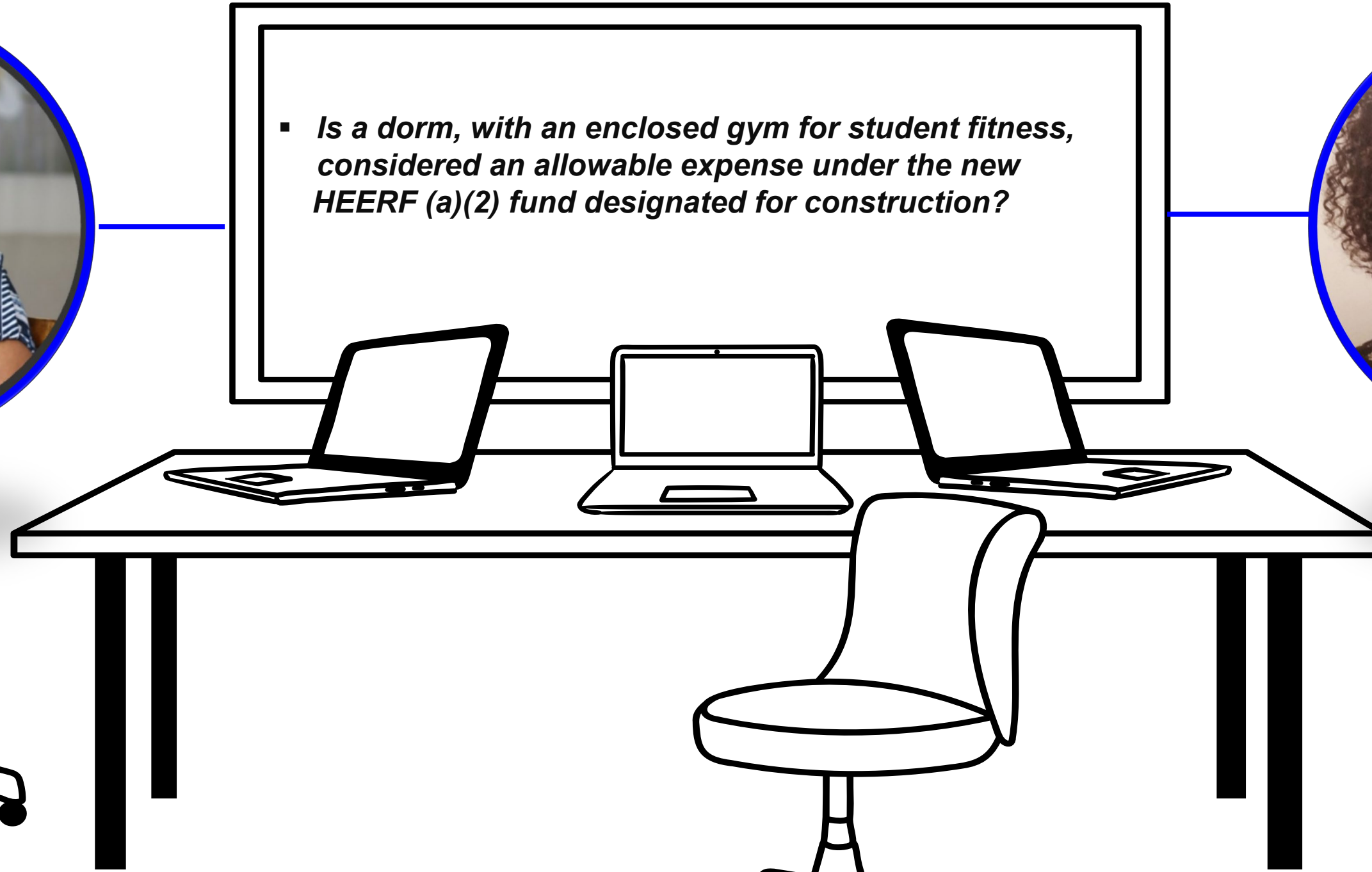
- *How long do grantees have to complete desired construction projects under the new (a)(2) allowances?*
- *Can an institution use (a)(2) funds to cover a project that has already started?*



Activity: Things that make you go... Hmmmm



- *Is a dorm, with an enclosed gym for student fitness, considered an allowable expense under the new HEERF (a)(2) fund designated for construction?*



FINAL THOUGHTS & TAKEAWAYS



(a)(2) IHEs must submit the prior approval form and both two attachments (ED 524 & SF 424D forms) to initiate the approval process.



(a)(2) IHEs must check “YES” to all assurance statements listed on the prior approval form (page 2).



The designated State Director and/or Authorizing Official are responsible for submitting the (a)(2) project approval form, attachments, and supporting documentation to support a reasonable timeline and budget.



The Prior Approval Form offers adequate space for grantees to articulate how the project(s) aligns with preventing, preparing, or responding to COVID-19.



(a)(2) HEERF dollars can not support partially completed projects.



No additional HEER funds are available.

CITATION	SUBJECT MATTER
2 CFR 200.311	Real Property
2 CFR 200.450	Cost Principles
2 CFR Part 200 Subpart D - Procurement Standards	Procurement Standards
29 CFR Part 5 Subpart A	Contractor/ subcontractor wages and fringe benefits for construction, alteration, or repair of public buildings or public works
29 CFR Part 3	“Anti-kickback” provision for contractors and subcontractors
34 CFR 75.600	Assessment of Environmental Impact 20 U.S.C. 1232b Labor Standards
34 CFR Part 75 Subpart E	Department’s prior approval
2 CFR Part 200 Subpart D - Procurement Standards	Contract Provisions for Non-Federal Entity Contracts Under Federal Awards
34 CFR 75.601	Environmental Impact Assessments
34 CFR 75.602	Preservation of historic sites
34 CFR 75.603	Grantee site to title
34 CFR 75.604	Availability of cost-sharing funds
34 CFR 75.606	Completing the construction
34 CFR 75.607	General considerations in designing facilities and carrying out construction
34 CFR 75.609	Comply with safety and health standards
34 CFR 75.609 and 34 CFR 75.610	Access by the handicapped
34 CFR 75.615	Grantee must have operational funds
34 CFR 75.615	Operation and maintenance by the grantee
34 CFR 75.616	Energy Conservation
34 CFR 75.611	Avoidance of flood hazards and Compliance with the Coastal Barrier Resources Act
34 CFR 75.606	Completing the construction
34 CFR Part 75 Subpart E	Charges for use of equipment or supplies

LINKS TO REQUIRED ATTACHMENTS

ACRONYM	SUBJECT MATTER
ED 524	Department of Education Budget Information Non-Construction Programs Form
SF 424D	Assurances Form



Things that make you go... Hmmm



Questions, Answers, and Sources

FREQUENTLY ASKED QUESTIONS

ANSWERS

SOURCES

“Can my institution use HEERF funds to purchase property?”

Yes. Grantees may purchase real property with HEERF (a)(2) funds in order to respond to pandemic-related needs for additional real estate, including to support construction or renovation projects; however, grantees may not use HEERF (a)(2) grant funds solely for the purchase of land without an immediate plan to acquire, renovate, or construct a building on that land. The purchase of land alone will not generally help grantees prevent, prepare for, or respond to coronavirus.

(a)(2) Construction, Renovation & Real Property
FAQ – Q7 (pg. 5);
Q18 (pg. 9); and
Q19 (pg. 9-10)

“Can (a)(2) IHEs use funds from other sources?”

Yes. Grantees may tap into non-Department of Education funds to complete construction, renovation, and real property projects; however, grantees are required to uphold all program requirements and guidance associated with other sources in addition to HEERF (a)(2) requirements and guidance. Additionally, grantees must complete approved projects by the end of the designated performance period. Grantees must clearly articulate the source and dollar amount of the non-HEERF funds on the pre-approval form, ED 524, and budget narrative.

(a)(2) Construction, Renovation & Real Property
FAQ – Q24 (pg. 11)

“What if my budget narrative does not fit on the form?”

Include a one-page attachment with the application package. Grantees are encouraged to further elaborate on the project details.

(a)(2) Construction, Renovation & Real Property
FAQ – Q4 (pg.4-5)

“What happens if a grantee has already spent their entire (a)(2) HEERF award?”

Grantees can repurpose a portion, or all, of previously spent (a)(2) awards to unobligated in (a)(1) institutional accounts in order to “free up” (a)(2) funds to spend toward construction activities. Additional reporting and regulatory requirements apply to this approach, including but not limited to, revising previously submitted quarterly and annual reports.

(a)(2) Construction, Renovation & Real Property
FAQ – Q25 (pg. 11-12)
and Q23 (pg. 11) **26.**



Things that make you go... Hmmm



Questions, Answers, and Sources

FREQUENTLY ASKED QUESTIONS	ANSWERS	SOURCES
<p><i>“What does it mean for a construction or renovation project to prevent, respond, or prepare for COVID-19?”</i></p>	<p>As with traditional HEERF allowances, it is still the responsibility of the institution to develop clear plans and projects that directly correlate to COVID-19. Institutions must explain how the expansion projects speak to preventing, preparing, or responding to the coronavirus</p>	<p>(a)(2) Construction, Renovation & Real Property FAQ – Q5 (pg.5)</p>
<p><i>“How long do grantees have to complete desired construction projects under the new (a)(2) allowances?”</i></p>	<p>HEERF (a)(2) performance periods have been extended through June of 2023. Grantees are eligible for a one year no cost extension through June 30th of 2024. Grantees should submit project timelines. Projects approved beyond June 30, 2023, will be granted an extension solely for the purposes of completing the project.***Program specialist may request additional documentation.</p>	<p>(a)(2) Construction, Renovation & Real Property FAQ – Q9 (pg. 6)</p>
<p><i>“Can an institution use (a)(2) funds to cover a project that has already started?”</i></p>	<p>Grantees must (1) submit the approval form and required attachments; and (2) receive an approval status from The Department BEFORE starting a project under the new HEERF (a)(2) allowances. Projects in, or beyond, the contractual bidding phase are not eligible. Projects in the planning phase are eligible upon receipt of an approval status from The Department.</p>	<p>(a)(2) Construction, Renovation & Real Property FAQ – Q11 (pg. 7)</p>
<p><i>“Is a dorm, with an enclosed student fitness room, considered an allowable expense under the new (a)(2) allowable expenses?”</i></p>	<p>It depends. Under the new allowances, (a)(2) HEERF funds can support the construction or renovation of new dorm spaces; but grantees must subtract the square footage– and total cost– of any space designated for facilities associated with athletics, sectarian instruction, religious worship, or marketing and recruitment (ASRMR) related activities from the total cost of the project.</p>	<p>(a)(2) Construction, Renovation & Real Property FAQ – Q12 (pg. 7)</p>
<p><i>“Should my institution list all our projects on one Prior Approval Form?”</i></p>	<p>Each project requires separate approval documentation. If an IHE seeks to complete three projects, using (a)(2) funds, it must submit three Prior Approval Request Forms, three ED-524 forms, and three SF-424D forms to reflect each individual project.</p>	<p>(a)(2) Construction, Renovation & Real Property FAQ – Q4 (pg. 4)</p>

Allowable Expenses with Exceptions

Institution Examples



FREQUENTLY ASKED QUESTIONS	ANSWERS	SOURCES
<p><i>“University X seeks to repurpose HEERF funds to support an expansion project.”</i></p>	<p>University X was originally awarded \$2 million dollars for the HEERF (a)(2) grant. They previously used \$1.7 million dollars towards emergency grants for students, which leaves just \$300,000 in their (a)(2) account.</p> <p>If University X desires to complete an (a)(2) expansion project, they can update their quarterly and annual reports to reflect the previously spent \$1.7 million dollars as an (a)(1) institutional expense, if that balance is currently available in their (a)(1) institutional account. Doing so will allow University X to allocate up to \$2 million dollars towards a construction, renovation, or real property project.</p>	<p>(a)(2) Construction, Renovation & Real Property FAQ – Q25 (pg.11-12)</p>
<p><i>“College Y seeks to create worship space for families inside a new, state of the art child- care facility on campus.”</i></p>	<p>College Y plans to build a new, 5000 square foot, state of the art childcare facility. In the center of the building, University Y intends to construct a 1000 square foot non-denominational family worship space.</p> <p>According to the new HEERF (a)(2) allowable guidance, College Y must subtract 1000 square feet of worship space from the 5000 total square foot project. Doing so results in 4000 square feet of eligible space supported by the new (a)(2) HEERF allowable. College Y will absorb the cost of the remaining 1000 square feet.</p>	<p>(a)(2) Construction, Renovation & Real Property FAQ – Q13 (pg.7-8)</p>
<p><i>“Community College Z seeks to create more space in the student career center.”</i></p>	<p>Community College Z decided to expand the student career center to accommodate greater social distancing as a best practice to prevent the spread of COVID-19. They worked with an architect to develop plans and obtained preliminary blueprints.</p> <p>Although the project has already entered the planning phase, actual construction work or acceptance of bids has not occurred, so expansion of University Z’s student career center is eligible for HEERF (a)(2) funding.</p>	<p>(a)(2) Construction, Renovation & Real Property FAQ – Q10 (pg. 6-7)</p>

Let's Connect

Email questions to your assigned HEERF Program Specialist

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A top-down view of a wooden desk. On the left is a white keyboard. In the top right is a white cup on a saucer. On the right is a silver pen. In the center is a stack of sticky notes. The top note is white and has the text "Thank you!" and a smiley face drawn on it in black ink. The other notes in the stack are light brown.

Thank
you!

