



OFFICE OF POSTSECONDARY EDUCATION (OPE)

OVERVIEW ON THE HIGHER EDUCATION EMERGENCY RELIEF FUND UNDER THE AMERICAN RESCUE PLAN ACT OF 2021 FOR PROPRIETARY INSTITUTIONS

MAY 2021

AGENDA

- Introductions
- About the American Rescue Plan Funding
- Equitable Eligibility – Students with Exceptional Needs
- Recovery
 - Emergency Financial Aid
 - Retention
- Transparency & Accountability
- Tools & Resources
- Discussion (Q&A)



DISCLAIMER

This document is being used in support of a live discussion. As such, it does not necessarily express the entirety of that discussion nor the relative emphasis of topics therein.

Institutions are encouraged to carefully review the Department's full guidance at the end of this presentation and on the [ARP HEERF III](#) website.



AMERICAN RESCUE PLAN (ARP)

The ARP is a \$40 billion investment in America's institutions of higher education – double the first two COVID recovery packages combined.

The total \$76 billion investment helps:

- Mitigate the negative impact of the pandemic on students' educational attainment.
- Target resources to students with greatest need.
- Support students' ability to meet basic needs.
- Support for staffing, teaching, student support services, and educational programs/courses.
- Support campus safety measures and protocols.
- Comply with guidelines on allowable expenses and reporting requirements.



AMERICAN RESCUE PLAN (ARP)

ARP is also one of the largest, single, investments ever made in American higher education--for both students and institutions. It provides resources for many of our nation's most under-resourced institutions that educate the students most impacted by the pandemic. These investments include:

- More than \$10 billion to Community Colleges,
- More than \$2.6 billion to Historically Black Colleges and Universities (HBCUs) and more than \$6 billion to minority-serving institutions (MSIs),
- It also provides close to \$400 million to students enrolled at proprietary institutions.



OBLIGATING FUNDS

- **We will supplement your existing awards:** Proprietary colleges must first submit the HEERF required [Proprietary Institution Certification Form](#). The Department will then make supplemental awards to your existing CRRSAA student portion grant.
- **Applying for a new award:** If you did not apply for CRRSAA you may apply for ARP funding via grants.gov.
- **More than a year to spend:** Once obligations are made, your college will have a full year to spend both your existing CRRSAA funds and new ARP funds. Colleges can also request a no-cost extension for an additional year (FAQ questions #39, 40, and 41).



PRIORITIZING EXCEPTIONAL NEEDS

- All students, regardless of citizenship, qualify ([our new eligibility rule can be found here](#))
- Colleges can use various ways to identify exceptional need, including:
 - Pell grant recipients,
 - Information on the FAFSA (FASFA is not required for HEERF funds), or
 - Alternative information, such as significant unexpected expenses either for themselves or their families, including the loss of employment, reduced income, or food or housing insecurity.
- An analysis by the Government Accountability Office found about 50 percent of colleges in a sample did not report requiring a FAFSA.
- Colleges are expected to establish a transparent process for assessing need.
- See FAQ questions #7-9 for more information on eligibility and greatest need.



EQUITABLE RECOVERY – EMERGENCY AID

- When making HEERF emergency financial grants to student's colleges must not:
 - Condition the receipt of emergency financial aid grants to students on continued or future enrollment in the institution,
 - 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
 - Require such consent as a condition of receipt of or eligibility for the emergency financial aid grant.
- See FAQ questions #7-19, 22, 27 for more information on emergency financial aid grants to students and marketing.



EQUITABLE RECOVERY – EMERGENCY AID

- The Department may determine an institution has failed to prioritize students with exceptional need if the institution established preconditions for students to receive emergency financial aid grants, such as:
 - Establishing a minimum GPA,
 - Imposing other academic, athletic performance, or good standing requirements,
 - Requiring continued enrollment in the institution, or
 - Requiring the student to first pay any outstanding debt or balance.
- See FAQ questions #7-19 for more information on emergency financial aid grants to students.



REMINDERS – STUDENT GRANTS

- Direct “marketing and recruitment” activities are an impermissible use of HEERF funds (see FAQ questions #22 and 27).
- Institutions cannot include the amount of a HEERF student emergency financial aid grant in students’ financial aid award package (see FAQ question #17).



TRANSPARENCY AND ACCOUNTABILITY

HEERF PROPRIETARY INSTITUTION CERTIFICATION FORM

- To assist with management and oversight of HEERF funds, proprietary colleges must complete a new [Proprietary Institution Certification Form](#) before receiving an obligation (i.e., either a supplemental award if the institution already has a CRRSAA a4 grant or a new award if applying for a4 HEERF grant funds for the first time).
- The form must be signed by the institution's President or CEO, and any owners with at least 25% ownership in the institution.
- Institutions must email the completed form by August 11 to the Department at HEERFARP4@ed.gov
- Also see FAQ questions #4 and 5.



TRANSPARENCY AND ACCOUNTABILITY

HEERF PROPRIETARY INSTITUTION CERTIFICATION FORM

What kinds of signatures for the form are acceptable?

- A classic “wet” signature, that is, someone prints off the form, signs it, scans it, and emails the Department.
- A picture signature (such as a JPG of their real signature imposed on the signature line).
- “signed certificate” e-signature done through Adobe.

Please note the Department **will not** accept typed signatures for this form. The purpose of the form is to establish that the individual signing the document intended to be bound to the responsibilities and requirements described in the form.



TRANSPARENCY AND ACCOUNTABILITY

HEERF PROPRIETARY INSTITUTION CERTIFICATION FORM

What does “ownership” mean?

As described in the form, we want first-line owners, or their authorized representatives (in the case of corporate entity ownership), with 25% or more ownership to sign. The form does not collect second or third (or deeper) line ownership, even if those lines of ownership ultimately lead to an individual or entity that may, together, have 25% or more ownership.



TRANSPARENCY AND ACCOUNTABILITY

REPORTING, AUDITS, FUND DECLINES

- **Quarterly Reporting:** Grantees receiving ARP funds must continue to adhere to the two quarterly reporting requirements originally implemented through the CARES Act. Next deadline to post quarterly reports is July 10 (FAQ #36).
- **Annual Reporting:** More information to follow, but we plan to have institutions report on calendar year 2021 early next year (FAQ #37).
- **Voluntary Decline of HEERF Grant Funds:** Any institution may voluntarily decline its full award or a portion of its award in the next three months so those funds can be redistributed by formula to institutions with greater need (FAQ #6).
- **Audits** (FAQ #38).
- Also see FAQ questions #49 and 50.



RESOURCES

- **HEERF Customer Care Center**
 - Email: HEERF@ed.gov and Phone: 202-377-3711
- **ARP home page**
 - <https://www2.ed.gov/about/offices/list/ope/arp.html>
- **ARP FAQs (issues on May 11, 2021)**
 - <https://www2.ed.gov/about/offices/list/ope/arpfaq.pdf>
- **HEERF Grant Auditing Requirements (issued March 8, 2021)**
 - <https://www2.ed.gov/about/offices/list/ope/heerfauditletter.pdf>
- **Proprietary Institution Certification Form**
 - <https://www2.ed.gov/about/offices/list/ope/arpproprietarycerft.pdf>



RESOURCES

- **Email addresses for HEERF documentation**

- HEERF Quarterly Reports: HEERFReporting@ed.gov
- Voluntary Decline of HEERF Grant Funds: HEERFRefund@ed.gov
- HEERF Proprietary Institution Certification Form: HEERFARP4@ed.gov

- **Voluntary Decline Form**

- <https://www2.ed.gov/about/offices/list/ope/arpheerfiiivoluntarydecline.pdf>



