



HEERF III Student Aid Funds - Direct Emergency Grants to Students Prepared by SUNY System Administration

Under the American Rescue Plan (ARP), passed by Congress and signed by the President in March 2021, a third round of funding was provided in the amount of \$36.9 billion for the Higher Education Emergency Relief Fund (HEERF III). The U.S. Department of Education (ED) is allocating HEERF III funds to institutions in two portions, similar to the HEERF I and HEERF II funding, one focused on providing emergency grants to students in its entirety and the other more focused on campus needs; albeit with the strong recommendation to use the latter funds to provide additional student emergency grants.

Based on the ED allocations tables, SUNY Campuses will receive approximately \$463 million in HEERF III Student Aid funds.

A. HEERF III Student Aid Funds – Key ED Requirements Per the [FAQs](#):

1. SUNY Campuses will automatically receive HEERF III Student Aid Funds, and therefore do not need to complete an application or Certification and Agreement form. However, there will be new terms and conditions detailed within the Grant Award Notification (GAN) and in a [Supplemental Agreement](#) attached to the GAN.
2. At the time campuses draw down the HEERF III Student Aid Funds, campuses agree to be bound by the conditions of the grant, including those in the Supplemental Agreement.
3. HEERF III Student Aid Funds may be used **by students** 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 childcare.
4. The ED requires prioritization to students with exceptional need, such as students who are Pell eligible or undergraduates with extraordinary financial circumstances, when awarding emergency grants to students.

5. HEERF III Student Aid Funds include no student eligibility requirements other than a student is identified as an individual who is or was enrolled (as defined in 34 CFR § 668.2) at the campus on or after March 13, 2020. The ED indicated that Deferred Action for Childhood Arrival (DACA) recipients, Development, Relief, and Education for Alien Minors Act (DREAMers), international students, refugees, asylum seekers and undocumented students may receive emergency grants. The HEERF III Student Aid Funds can also be awarded to students exclusively enrolled in distance education.
6. Campuses can notify students they may “**opt in**” and apply HEERF emergency grants directly to their student account. However, campuses may **not** encourage or suggest to students that they apply their HEERF III Student Aid Funds to their accounts. Campuses may **not** require a student to consent to the application of the emergency grant to the student’s account as a condition of receipt of or eligibility for, an emergency grant.
7. Campuses may **not** condition the receipt of HEERF III Student Aid Funds to students on continued or future enrollment at the Campus. Also, adding preconditions to receiving an emergency grant that thwart this requirement may be subjected to oversight and corrective action.
8. The HEERF III Student Aid Funds are not Title IV funds. Therefore, rules for awarding and handling of the Title IV programs are not applicable. HEERF III Student Aid Funds are not considered estimated financial assistance (EFA) and therefore must not be included in the federal and State financial aid package for students.
9. Campuses have 90 days from the date of the HEERF III grant award notification to **draw down** any amount of HEERF I, II, or III funds. Campuses **do not** have to draw down **all** funds by this date. **Please Note:** Campuses do not need to expend all of the HEERF II Funds prior to drawing down the HEERF III Funds.
10. Campuses must disburse HEERF III Student Aid Funds to students within 15 calendar days of drawing down the funds from the G5 account.
11. HEERF III Student Aid Funds are subject to Single Audit requirements and all applicable auditing standards. Additionally, these funds may be subject to audit by SUNY System Administration.

B. SUNY Student Aid Awarding Methodology

1. SUNY requires campuses to prioritize students with the lowest Expected Family Contributions (EFC) and has created the attached template which campuses must use to calculate the HEERF III Student Aid Block Grants. This methodology was developed to provide Block Grants to students with exceptional need.

- Based on this awarding methodology, students will receive a Block Grant that consists of two components: 1) a Base Grant dependent on the student's full-time (FT) or part-time (PT) status **plus** 2) a standard supplemental amount based on the student's primary EFC.
- The EFC range was expanded to include EFCs 0 to 14,615 (2.5 times the max Pell 2021/22 EFC of 5,846).
- Campuses may distribute the Student Aid Block Grants all during the Fall 2021 term or split the distribution between the Fall 2021 and the Spring 2022 terms.
- The Base Grant must stay within the following ranges¹. If campuses have results outside these ranges, they must contact University Audit to review results before proceeding with any disbursements:

Base Grant ranges if campuses disburse all Block Grants in the Fall 2021:

- \$800 to \$2,000

Base Grant ranges if campuses split funds between two terms when disbursing Block Grants:

- \$400 to \$1,000
- Campuses must allocate a **minimum of 80%** of the HEERF III Student Aid Funds to this Block Grant awarding methodology.
- The remaining funds, a **maximum of 20%** will be a HEERF III Discretionary Pool for campuses to use for emergency grants to students with exceptional need and/or extraordinary financial circumstances who did not receive a Block Grant or need additional emergency grant funds. These students may include, but are not limited to:
 - Students seeking a financial aid adjustment due to (1) the recent unemployment of a parent(s), independent student and/or spouse, (2) other circumstances such as death or permanent disability of a parent(s) or spouse, and/or (3) the results of a direct outreach to financial aid applicants.

¹ Downstate, Optometry, Upstate, Empire, and Maritime will use the same methodology, but the emergency grants will not be within the noted ranges. The uniqueness of the student population size and composition for these campuses, i.e., not the standard undergraduate size, and the fact federal dollars received were calculated on undergraduate Pell awardees, creates the divergence.

- Refugees, asylum seekers DACA recipients, other DREAMers, and similar undocumented students.
- Students with an EFC outside the Block Grant range.
- Students from the Summer 2021 term or from prior terms not previously awarded.
- International students, including those attending online.
- Campuses may rollover any remaining HEERF I and HEERF II Student Aid Funds into the HEERF III Block Grant funds or the Discretionary Pool.
- Campuses using an application process to distribute the Discretionary Pool Funds must:
 - Ensure awards are **not greater than** the lowest Block Grant award for full-time and part-time students unless students receiving a Block Grant also have the opportunity to apply for additional funds. If the application is open to all students, including those receiving a Block Grant, we suggest campuses include a system edit which prevents a student from submitting an application for less than the amount of any Block Grant already received.
 - Thoroughly document all professional judgment and decision making for application awards within the student's file to ensure the campus can adequately support how the amount of each grant was calculated.
 - Use an easy to complete streamlined application form to minimize barriers to students receiving emergency grants. We recommend having four application components: demographics, selection of eligible expense categories with corresponding amounts, Opt-In for applying emergency grant amount to open student account balances, certification/attestation. **Please Note:** campuses do not need to require students to provide a written explanation/narrative as to why they need the funds.
- The ED suggests that individual emergency grants not be greater than the annual Pell award for 2021-22 (\$6,495).
- Emergency grants provided to students outside the SUNY awarding methodology cannot be greater than the lowest grant award for full-time and part-time students.

2. Campuses must send the following communication with all payments to students:

“In response to the coronavirus pandemic, funds have been made available through the American Rescue Plan Act to award emergency grants to students for expenses related to any component of the student’s cost of attendance or for emergency costs that arise due to coronavirus. Eligible expenses include tuition, food, housing, health care (including mental health care), or childcare. The Campus has deemed you eligible to receive an emergency grant in the amount of \$XXX. This is not a loan and will not need to be paid back and will not affect your financial aid award amounts for academic year 2021-2022. Students must understand it is their responsibility to notify the XXX Office immediately if they will not incur expenses that meet or exceed the amount of their emergency grant.”

3. Campuses have the option of allowing students to affirmatively “**opt in**” to apply the HEERF III Student Aid emergency grants to the student’s outstanding balance.

- The Campus must develop an efficient process to obtain the student’s written (or electronic) affirmative consent to apply the funds to their account.
- The Campus must limit the time period to a maximum of no more than 10 days for the student to provide the written notification to the Campus.
- The following is suggested language campuses should add to the above required student communication (see II.B. above) if offering the “**opt-in**” to students:

“You will receive a direct payment of your emergency grant by electronic transfer to your bank account [campuses may change to check] unless you respond by sending an email to XXXXX within 10 days indicating you would like to apply all or a portion of your emergency grant to your outstanding account balance. You must identify the amount you would like to apply to your account within your email communication.”

4. Campuses must email the final HEERF III Student Aid Block Grant template to FinAID@suny.edu for SUNY System data tracking purposes.

C. Student Aid Funds - Campus Plan and Supporting Documentation Requirements

1. Campuses must **develop a written plan** covering the awarding and distribution of HEERF III Student Aid funds as follows:

- Identify the individuals who are responsible for developing the Plan for the Campus.

- Include a detailed explanation of the SUNY awarding methodology and attach the final HEERF III awarding template.
 - Document the awarding methodology used to disburse emergency grants to students from the remaining Discretionary Pool Funds and any Institutional funds.
 - Distribution of Emergency grants:
 - Document the methods used to disburse the HEERF III Student Aid Funds to students such as checks, electronic transfer payments, debit cards, and payment apps.
 - Document the method developed for students to “opt-in” and select the dollar amount applied to their student account balance.
 - Student Communications – Document the instructions, directions, or guidance that will be provided to students regarding the HEERF III Student Aid Funds, including the allowable uses of the funds.
2. Campuses are required to maintain adequate documentation of all variables that were used to select each recipient and calculate the emergency grant amount at the time of disbursement.
 3. Campuses must have a process for reconciling and monitoring outstanding checks and the related due diligence notification to students.

D. Reporting Requirements

1. The ED has indicated the Quarterly Reporting will be a combined single reporting of HEERF I, HEERF II, and HEERF III Funds. Campuses are to continue to report the required seven elements in a format and location that is easily accessible to the public. This information must be updated no later than 10 days after the end of each calendar quarter (September 30, December 31, March 31, and June 30). For example, the June 30, 2021 report must be posted on or before July 10, 2021.
2. Quarterly Reports **must** provide periodic data for the quarter and may also include cumulative data; although not required. [See FAQ #36.](#)
3. Maintain adequate documentation supporting each of the reporting elements and specifically the numbers reported for eligible students, number of students receiving awards, and total amount of awards distributed.

4. Ensure the Quarterly Reports are clearly labeled and include the period ended date (i.e., June 30, 2021). We also recommend including the report posted date.
5. Ensure the periodic and cumulative (if included) total number of students and total disbursements reported are as of the last day of the quarterly reporting period (i.e., June 30).
6. Indicate whether the total number of students reported is a duplicated or unduplicated count.
7. If the Campus disbursed all the HEERF Student Aid Funds during a quarter, the following statement should be included with the quarterly website reporting: **“Final Quarterly Report posting which covers all HEERF I, II, and III Student Aid fund expenditures.”** After campuses post the final quarterly report, they will no longer be required to provide future quarterly reports for HEERF I, II, and III funding. **Please Note:** If the campus already identified a final quarterly report for HEERF I funds we recommend adding a footnote that the final report was for HEERF I funds only.
8. When reporting emergency grants funded from Institutional Funds, we recommend campuses identify the total amount of Institutional Funds as well as the Student Aid Funds disbursed to students.
 - **Example:** 3,583 students received student aid emergency grants. \$3,200,000 was distributed under the Student Portion and an additional \$200,000 was distributed under the Institutional Portion as of 12/31/2020.
9. If campuses redistribute Student Aid Funds due to unclaimed outstanding checks and ACH transfers, we suggest the campus consider adding the following note to the quarterly reports containing redistributions for transparency:

“The reported disbursements may include redistributions of unclaimed emergency grants previously reported.”

Example:

The Campus redistributed \$20,000 of previously reported distributions of unclaimed emergency grants during the quarterly period ended 3/31/2021.

Student Aid Funds Quarterly Report for March 31, 2021:

The total amount distributed in emergency grants as of 3/31/2021 is \$3,550,000.¹

¹ **Please Note:** *The reported disbursements may include redistributions of unclaimed emergency grants previously reported.*

HEERF III Presentation Chat Questions with Answers

1. Summer 2021 Distributions from Discretionary Pool:

Campuses may use the template method or distribute a flat amount to Summer 2021 students with eligible EFCs.

2. Disbursing Funds in Fall 2021 and Spring 2022 Terms:

- a. Emergency Block Grant Awards are calculated separately for each term based on students enrolled during the term.
- b. Populate the Fall 2021 Template when ready to calculate and distribute the Fall 2021 Student Emergency Block Grant awards.
- c. Populate the Spring 2022 Template when ready to calculate and distribute the Spring 2022 term Student Emergency Block Grant awards.
- d. The Campus can determine the amount of funds to distribute for each Term. The funds **do not** need to be evenly split 50/50 between the two Terms.

3. Disbursing HEERF III Student Aid Funds only in the Fall 2021 Term:

- a. Campuses need to complete the Fall 2021 template only and should disregard the Spring 2022 template.
or
- b. Campuses may award all the HEERF III Student Aid Funds only in the Fall 2021 Term and save the Discretionary Pool funds for the Spring 2022 term.

4. Clarification of Student Aid Guidance and Alternative Method for Identifying Eligibility for Need:

Please note, at the bottom of page 4 of the HEERF III SUNY Student Aid Guidance it states that *“Emergency grants provided to students outside the SUNY awarding methodology cannot be greater than the lowest grant award for full-time and part-time students”* The following student aid emergency grants would be considered to be within the SUNY awarding methodology and not subject to the limitation of the lowest award for full-time and part-time students:

Emergency grants may be awarded to students based on "some form of documented need verification" that results in the campus' ability to assign an EFC equivalency within the SUNY template awarding methodology. The following is just one example of a methodology that may be used, but campuses should develop methodologies specific to the campus' student population:

Example

The campus is able to determine an EFC equivalent to provide an award equivalent to a Pell eligible (125% and 100% supplemental) category of the HEERF III template.

- An example of a student who may be slotted into the 125% (EFC range of 0 -2923) is a non-FAFSA filer who is a recipient of a maximum NYS TAP award of
 - \$5665 for a dependent student;
 - \$3525 for Independent students who are married with no other tax dependents;
 - \$3025 for Independent students who are single with no tax dependents .

HEERF III Presentation Chat Questions with Answers

- An example of a student who may be slotted into the 100% (EFC range of 2924-5846) is a non-FAFSA filer who is a recipient of a NYS TAP award between
 - \$500 - \$5,664 for a dependent student
 - \$500 - \$3,524 for independent students who are married with no other tax dependents
 - \$500 - \$3,024 for independent students who are single with no tax dependents.

5. Documentation of Need for Non-FAFSA Filers

An attestation statement from a student is not sufficient to support exceptional need or extraordinary financial circumstances.

6. Guidelines for Communicating Applications to Students:

The ED did not provide specific guidelines, but we recommend applications be easily accessible to all eligible students. Campuses should send a communication indicating there is an application process and the eligibility requirements to all eligible students.

7. Applications which include a Student identifying Qualifying Expenses:

Students should indicate their qualifying expense(s) in the application. Per the ED, Emergency 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 childcare.

As noted above, the ED also indicated other types of exceptional need could include students who have faced significant unexpected expenses, such as the loss of employment (either for themselves or their families), reduced income, or food or housing insecurity.

8. Rollover of Remaining HEERF I and II Funds:

Campuses may roll remaining HEERF II funds into the HEERF III template grant calculations and/or the HEERF III Discretionary Pool. Campuses should add a note in their HEERF II Plan and HEERF II website reporting that they rolled remaining HEERF II funds into HEERF III funds for full transparency.

9. Use of Student Aid Funds for awards related to specific fees, residential students, etc.

Institutional Funds and not Student Aid funds, should be used for disbursements to students to cover specific fee increases, technology costs, resident students, etc.