



PAPSA
Institutional HEERF Grant
Usage and Reporting

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<https://www.mcclintockcpa.com/category/covid-19-updates/>



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<https://offer.mcclintockcpa.com/covid-19>

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TRUSTED ADVISORS IN AN UNPREDICTABLE WORLD

After the COVID-19 pandemic affected students' education and institutions' operations alike, the past months have seen a flurry of new laws, programs and announcements by governments and regulatory bodies. These developments have a major impact on Title IV aid, financial statements and far more. Check out these resources for a primer on the most important programs and processes for institutions.

Window Type



COVID-19 Resources

<https://www.maynardcooper.com/covid-19-task-force-and-resources/>



COVID-19 TASK FORCE AND RESOURCES

PROFESSIONALS

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MENU

COVID-19 Task Force and Resources

Maynard Cooper is committed to providing client-focused solutions during this time of heightened uncertainty.

Maynard Cooper COVID-19 Coronavirus Task Force

Admiralty and Maritime

Tom Rue and Jaime Betbeze

Banking and Finance

David Kinman

Business Continuity / Supply Chain

Allison Taylor and Warren Lightfoot

Commercial Contracts / Force Majeure

Beth O'Neill and Sarah Glover

Outline

HEERF Grant Usage - General Guidelines

HEERF Grant Reporting Form - Commentary

Questions & Answer Session

HEERF Grant Usage

General Guidelines

Usage Reminders and Best Practices

- Return funds to G5 if not currently expended
- Documentation, especially for payroll and physical changes to space, is important (procurement regulations)
- New or incremental costs – above & beyond normal cost
- Emergency period – one year
- Ensure any payroll and rent expenses claimed were not paid by the PPP loan
- Rank the expenditures and utilize the HEERF grant for the “easiest” items first

Allowable Reimbursements Under 18004(a)(1)

- Refunds or account credits for tuition / housing
- Rent (educational facilities)
 - Additional rent for social distancing, not due to an increase in students
 - Rent for period when facilities were shuttered
- Payroll for faculty overtime, additional classes being taught, new COVID administrator
 - This listing is not all inclusive

Possible Reimbursements Under 18004(a)(1)

- Professional services related to HEERF – appears to be supportable based upon ED's contracted services August 2020 guidance and webinar comments
- Payroll for faculty while enrollment decreased? – ED wants to review and provide clarity in the future

Unallowable Reimbursements Under 18004(a)(1)

- Lost revenue as this is not associated with a cost
- Executive salaries
- Information technology and upgrades which were planned prior to the pandemic – adaptation due to the pandemic may be allowable for incremental costs
- Scholarships to cover institutional costs which existed prior to the pandemic

HEERF Grant Reporting Form

Commentary

Please note that the categories listed may include categories that are applicable to only one or two, and not all, of the grant programs for which information must be reported on this form. Further, each category is deliberately broad and does not capture specific grant program requirements. For example, pursuant to Section 18004(c) of the CARES Act, the Section 18004(a)(1) Institutional Portion funds may only be used “to cover any costs associated with significant changes to the delivery of instruction due to the coronavirus...” and any applicable categories in the chart must meet this requirement. Please refer to the applicable Certification and Agreement and the Department’s HEERF FAQs for more information available on our HEERF website here: <https://www2.ed.gov/about/offices/list/ope/caresact.html>.

HEERF Grant Reporting Form

Category

Providing additional emergency financial aid grants to students **

Commentary

Solely for additional student HEERF grants

*** To support any element of the cost of attendance (as defined under Section 472 of the Higher Education Act of 1965, as amended (HEA)) per Section 18004(c) of the CARES Act and the [Interim Final Rule](#) published in the Federal Register on June 17, 2020 (85 FR 36494). Community Colleges in California, all public institutions in Washington State, and all institutions in Massachusetts have different requirements due to recent U.S. District Court actions. Please discuss with legal counsel. [HEERF litigation updates can be found here.](#)*

HEERF Grant Reporting Form

Category

Providing reimbursements for tuition, housing, room and board, or other fee refunds

Commentary

Ensure reimbursements were sent to the student or credited to the student's account – institutional or noninstitutional housing (externship)

HEERF Grant Reporting Form

Category

Providing tuitions discounts

Commentary

N/A as ED seemed to indicate these are reduction of institutional costs prior to the pandemic which is unallowed under 18004(a)(1)

HEERF Grant Reporting Form

Category

Covering the cost of providing additional technology hardware to students, such as laptops or tablets, or covering the added cost of technology fees

Commentary

Information technology hardware provided directly to students, not institutional hardware / assets

HEERF Grant Reporting Form

Category

Providing or subsidizing the costs of highspeed internet to students or faculty to transition to an online environment

Commentary

Information technology services paid on behalf of the students, not services directly for the institution

HEERF Grant Reporting Form

Category

Subsidizing off-campus housing costs due to dormitory closures or decisions to limit housing to one student per room; subsidizing housing costs to reduce housing density; paying for hotels or other off-campus housing for students who need to be isolated; paying travel expenses for students who need to leave campus early due to coronavirus infections or campus interruptions.

Commentary

New housing costs for additional space (institutional costs and not student housing reimbursements) and travel expenses of students

HEERF Grant Reporting Form

Category

Subsidizing food service to reduce density in eating facilities, to provide pre-packaged meals, or to add hours to food service operations to accommodate social distancing

Commentary

Payroll, direct food costs, equipment

HEERF Grant Reporting Form

Category

Costs related to operating additional class sections to enable social distancing, such as those for hiring more instructors and increasing campus hours of operations

Commentary

Faculty payroll costs (overtime, new faculty, paid time off buy out)

HEERF Grant Reporting Form

Category

Campus safety and operations **

Commentary

Costs for Personal Protective Equipment, new costs to clean facilities, new costs to administer the testing, physical changes to the facilities for social distancing

*** Including costs or expenses related to the disinfecting and cleaning of dorms and other campus facilities, purchases of personal protective equipment (PPE), purchases of cleaning supplies, adding personnel to increase the frequency of cleaning, to the reconfiguration of facilities to promote social distancing, etc.*

HEERF Grant Reporting Form

Category

Purchasing, leasing, or renting additional instructional equipment and supplies (such as laboratory equipment or computers) to reduce the number of students sharing equipment or supplies during a single class period and to provide time for disinfection between uses

Commentary

Educational classroom equipment (classroom computers, tools, skeletons, mannequins), “hard assets”

HEERF Grant Reporting Form

Category

Replacing lost revenue due to reduced enrollment

Commentary

N/A as lost revenue unallowed under 18004(a)(1)

HEERF Grant Reporting Form

Category

Replacing lost revenue from non-tuition sources (i.e., cancelled ancillary events; disruption of food service, dorms, childcare or other facilities; cancellation of use of campus venues by other organizations, lost parking, revenue, etc.) **

Commentary

N/A as lost revenue unallowed under 18004(a)(1)

*** Including continuance of pay (salary and benefits) to workers who would otherwise support the work or activities of ancillary enterprises (e.g., bookstore workers, foodservice workers, venue staff, etc.).*

HEERF Grant Reporting Form

Category

Purchasing faculty and staff training in online instruction; or paying additional funds to staff who are providing training in addition to their regular job responsibilities

Commentary

Costs related to training faculty (webinars, new employee, training manuals) – analyze salary versus adjust / hourly faculty and new costs which were incurred

HEERF Grant Reporting Form

Category

Purchasing, leasing, or renting additional equipment or software to enable distance learning, or upgrading campus wi-fi access or extending open networks to parking lots or public spaces, etc.

Commentary

Institutional equipment (simulation equipment, servers, VPN devices, Wi-Fi, LMS licenses)

HEERF Grant Reporting Form

Category

Other Uses of (a)(1) Institutional Portion funds **

Commentary

- Professional services
- Rent for additional space for social distancing or shuttered educational facilities
 - Payroll for faculty not furloughed while enrollment decreased or period of non-instruction?

***Please post additional documentation as appropriate and briefly explain in the “Explanatory Notes” section. Please note that costs for Section 18004(a)(1) Institutional Portion funds may only be used “to cover any costs associated with significant changes to the delivery of instruction due to the coronavirus, so long as such costs do not include payment to contractors for the provision of pre-enrollment recruitment activities; endowments; or capital outlays associated with facilities related to athletics, sectarian instruction, or religious worship.”*

Reporting Reminders and Best Practices

- Costs are for the quarter and not cumulative
- Check “final report” when funds are fully expended and claimed
- Post on website in close proximity to student HEERF grant disclosures
- Maintain all postings on website, not just most current - can utilize pdfs
- ED encouraged schools to send links to their website report postings to HEERFreporting@ed.gov

Questions & Answers

