



Town Hall

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New HEERF Guidance



Applicable to all HEERF allocations to date (CARES/CRRSAA/ARPA)



Supplants much of the previous HEERF guidance prior to Jan 14



What's New?

Lost Revenue FAQ

Notice of Interpretation for Period of Allowable Expenses

**Period of Allowable Expenses for Higher Education
Emergency Relief Fund (HEERF) grant programs**

Updated FAQ

- **First Issued Jan 14 and Updated March 19 with Questions 22-28 and a slight tweak to question 12**

Notice of Interpretation for Period of Allowable Expenses



Answers the date question

All HEERF allocations can be used for permitted uses dating back to March 13, 2020

Applicable to both the emergency grants to students share and the institutional share



Guidance also makes clear that the one-year spending period for each individual HEERF allocation is reset with the granting of each additional HEERF allocation.

No-cost extensions of up to one year for these awards also are available under certain circumstances.

Student Share



All HEERF funds can be used to make grants to students beyond just those who are Title-IV eligible, including:

- non-degree-seeking, non-credit, dual enrollment, and continuing education students
- students who have left school for any reason during the period of the national COVID-19 emergency that began on March 13, 2020
- students who are qualified aliens, including refugees and persons granted asylum.

Schools may provide all emergency grants directly to students using the institution's normal process for providing a credit balance refund to students without obtaining a student's consent, if these funds remain unencumbered by the institution.

Institutions can also directly use their institutional share to pay unpaid student account balances or other student account debts.

Institutional Share



- Guidance confirms that institutional shares of HEERF aid can be used to cover employee benefit expenses, as a component of payroll, if the costs are newly associated with the coronavirus pandemic.
 - Use your best judgment to decide here!

Lost Revenue FAQ



- A definition
- Applicable to all HEERF Grants
- Both academic and auxiliary sources
- Unallowable uses
- Methodologies
- Grant time period charges / uses
- Use extensions
- SEFA

Lost Revenue FAQ



- Lost revenue – the amount a college was expecting and that was eliminated or reduced as a result of the coronavirus pandemic.

Academic Sources

Tuition, fees and institutional charges
Room and board
Enrollment declines
Supported research
Summer terms and camps

Auxiliary sources

Cancelled ancillary events
Disruption of food services
Dormitory services
Childcare services
Use of facilities or venues
Bookstore revenue
Parking revenue
Lease revenue
Royalties
Other operating revenue

Judgement is always required

Consider what's nonallowable first

- Athletic facilities
- Acquisition of real property
- Contributions
- Marketing / recruitment
- Sectarian instruction or religious worship related revenue
- Alcohol sales
- Investment income

Methodologies

- Three-year average
- Year to year / Term to term comparison
 - Prorate FY20 if year to year comparison
 - Prorate FY20 if spring term to spring term comparison
- Budget amounts
 - Documentation will be important
- Choose a methodology
 - Methods are not specific to the examples

Lost Revenue FAQ

- Time period / use charges
 - If fiscal year, end of period
 - If term, end of term period
- Comprehensive award period
 - All HEERFs at least until 2022 based on GANS
 - Extension requests can be made
- SEFA
 - At least FY21 in all cases
 - Several years in play may affect timing of expenditure reporting

Q&A

Upcoming Events



Your Future Workforce: From Transactional to Transformational (March 31, 1-2pm ET)

To Rebalance or Not to Rebalance: Post-COVID-19 Portfolio Considerations (April 6, 1-2pm ET)

2021 Higher Education Accounting Forum (April 7-8)

Endowment Spending: Should You Change Your Policy Now? (April 20, 1-2pm ET)

Visit the NACUBO website for all details! (nacubo.org/events)

Thank you!

