

UNIVERSITY of HAWAI'I® West Oʻahu

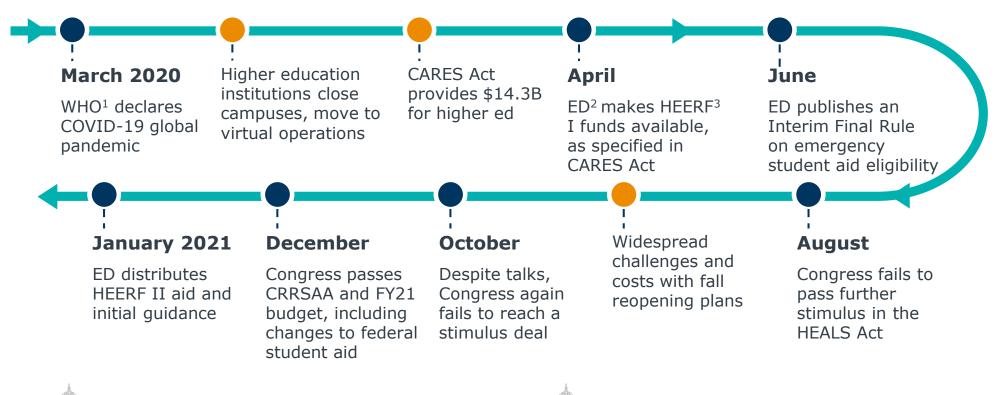
#### **Federal Funding Overview**

March 30, 2021 (EXEC) April 1, 2021 (FFAdvCouncil)

Draft 3.31.21

## **Overview of the Emergency Relief Fund Journey-Timeline (EAB)**

A Year of Pandemic Challenges, Punctuated by Volatile Federal Responses





#### **CARES and CRRSAA Acts**

#### **Coronavirus Aid, Relief, & Economic Security (CARES) Act**

- Enacted on March 27th, 2020
- \$2.2T in emergency relief with \$14.3B reserved for higher ed

#### **Coronavirus Response & Relief Supplemental Appropriations Act (CRRSAA)**

- Enacted on December 27th, 2020
- \$900B in emergency relief with \$22.7B reserved for higher ed





### **3 Tranches of Federal Relief Funds**

#### I. Coronavirus Aid, Relief, & Economic Security (CARES Act March 27, 2020)

- Tranche I: Student Aid
- Tranche II: Institutional
- Tranche III: MSI
- You may hear us call this HEERF I -- Higher Education Emergency Relief Fund. This was a total of \$14.3B

#### II. Coronavirus Response & Relief Supplemental Appropriations Act (CRRSAA December 27, 2020)

- Supplemental to Tranche I: Student Aid -- just received
- Supplemental to Tranche II: Institutional -- just received
- Supplemental to Tranche III: MSI -- just received
- You may hear us call this HEERF II -- Higher Education Emergency Relief Fund This was a total of \$22.7B

#### III. The American Rescue Plan (ARPA)

- This was proposed on Jan. 14, 2021, enacted March 22, 2021 (1.9 Trillion).
- For ED: \$18M Student Aid, \$18M Institutional, \$3.7 MISC
- You may hear us call this HEERF III -- Higher Education Emergency Relief Fund
- This will be a total of \$39.6B. More information anticipated within the next several weeks



#### Breakdown of Stimulus Differences & Similarities (Comparison of CARES, CRRSAA & ARPA)

	CARES	CRRSAA	ARPA
Amount	\$14.3B	\$22.7B	\$39.6B
Allocation	<ul> <li>\$12.6B to all Title IV institutions</li> <li>\$1B MSI funding</li> <li>\$349M in supplemental aid</li> </ul>	<ul> <li>\$20.2B to non-profits and publics</li> <li>\$1.7B MSI funding</li> <li>\$114M in supplemental aid</li> <li>\$681M for-profit student aid</li> </ul>	<ul> <li>\$36B to non-profits and publics</li> <li>\$3B MSI funding</li> <li>\$197.5M in supplemental aid</li> <li>\$395.8M for-profit student aid</li> </ul>
Timeframe	<ul> <li>One year use window, expenses back to 03/13/2020</li> </ul>	• One year use window, expenses back to 03/13/2020	<ul> <li>Pending ED guidance, likely one year, perhaps to FY23</li> </ul>
Uses	<ul> <li>At least 50% for financial aid grants to students for eligible cost of attendance expenses (e.g., housing)</li> <li>Institutional expenses arising from the shift to remote instruction</li> <li>Uses broadened to CRRSAA categories for expenses</li> </ul>	<ul> <li>At least the same amount as CARES for financial aid grants to students for any cost of attendance or emergency expenses</li> <li>Defray institutional costs associated with COVID, including lost revenue</li> <li>Student support services related to the Pandemic response</li> </ul>	<ul> <li>At least 50% for financial aid grants to students for any cost of attendance or emergency expenses</li> <li>Defray institutional costs associated with COVID, including lost revenue</li> </ul>





### **UHWO Awards: CARES & CRRSAA**

Award	CARES	CRRSAA: HEERF	Total
Student Portion	\$697,500	\$697,500	\$1,395,000 (expiration: 3/18/22)
Institutional Portion	\$697,500	\$2,218,948	\$2,916,448 (expiration: 3/18/22)
Minority Serving Institutions	\$1,263,422	\$2,213,850	\$3,477,272 (expiration: 6/7/22)
TOTAL	\$2,658,422	\$5,130,298	\$7,788,720





### Student Aid Guidance: CARES & CRRSAA

- Institutions must make financial aid grants to students, which can be used 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 child care.
- CRRSAA requires that institutions prioritize students with exceptional need, such as students who receive Pell Grants, and authorizes grants to students exclusively enrolled in distance education (NOTE: This was previously disallowed on HEERF).
- If a student "affirmatively" indicates, these financial grants may be applied to the student's outstanding balance. NOTE: There can be no evidence of coercion on the part of the institution to require students to use funds to pay off outstanding balances.



### Institutional & MSI General Guidance: CARES & CRRSAA

- May be used to defray expenses associated with coronavirus (including lost revenue, reimbursement for expenses already incurred, technology costs associated with a transition to distance education, faculty and staff trainings, and payroll), and to carry out student support activities authorized by the Higher Education Act of 1965 that address needs related to coronavirus.
  - There must be documentation indicating how these costs directly address the coronavirus pandemic at our campus. We cannot use funds to supplant or replace institutional funds for costs normally paid with these funds (e.g., gfunded payroll).
- May also be used to make additional financial aid grants to students.
- Able to use for costs incurred on/after March 13, 2020.



#### **Common Pathways to Use Funding**

Pathway	Description	Pro	Con
Recover Campus COVID Health and Safety Costs	Reimburse elevated operating costs such as testing, sanitation, and quarantine & isolation capacity	<ul> <li>✓ Could satisfy COVID best practice stipulation</li> <li>✓ Easiest to justify using grant directly to cover</li> </ul>	<ul> <li>× Limited strategic or enduring impact</li> <li>× Narrower category of eligible expenses</li> </ul>
Reimburse Lost Revenue	Defray lost revenue due to COVID disruptions, especially enrollment declines or auxiliary enterprise (e.g., housing)	<ul> <li>Maximize aid impact on institutional budget</li> <li>Ability to use recovered revenue for other or non-eligible purposes</li> </ul>	× Compliance burden in documenting, reporting and auditing lost revenue
Improve Digital Learning and Services	Invest in virtual instruction and service delivery enablement technologies (e.g., learning management service)	<ul> <li>✓ Support transition to a digital and student centric institution</li> <li>✓ Build infrastructure for growth and efficiency</li> </ul>	<ul> <li>× Limited to technologies that aligns with COVID response imperatives</li> <li>× One-time dollars won't cover reoccurring costs</li> </ul>
Award Additional Aid to Students	Provide further financial aid to students on top of required 50% and/or discharge student debts through revenue reimbursement	<ul> <li>✓ Further support students during the Pandemic and promote financial access</li> <li>✓ Positive public relations and student response</li> </ul>	<ul> <li>Unable to use dollars to replace existing institutional aid</li> <li>Aid needs to comply with ED stipulations</li> </ul>



#### Lessons Learned So Far . . .

- This is "relief" and NOT "bailout"
- This is "one-time" resources
- USDOE guidance on appropriate uses of relief aid often delayed and ambiguous
- It is "ALL" about the justification statement
- Growing deficit hawkishness may prevent Congress from passing further relief for higher education—do not assume that there will be more aid going forward





### **UHWO Strategy**

- Build a Team
  - Executive Decision making
  - Business Office Monitors regulatory updates, accounting & reporting
  - Federal Funding Advisory Council Advises Chancellor and Bus Office
  - Note: Financial Aid Distributes & reports Student Aid Tranche
- Guiding Principles
  - Our Hopena/Theory of Distinctiveness
  - Perspective -- Balance short-term with SAP Strategic Directives to maximize ROI
  - Communicate Often! Using multiple platforms.





### **UHWO Opportunities Process**

- Invite Proposals (March)
  - Work Groups introduced by VCs
  - Units OVCAA, OVCSA, OVCA, Chancellor
  - Targeted units: IT, Facilities, DE, OPDAS, Early College, Libraries, Counseling/ADA
- Proposals Reviewed (March-April)
  - Initially by "unit"
  - Guidance from Federal Funding Advisory Council
  - Business Office (determine eligible expense)
- Final Review & Decision (March-April)
  - Executive: Chancellor, VCs, Budget & Finance





#### Expenditures as of March 29, 2021

			Minority Serving Institutions	Total
		Institutional		
CATEGORY	Student Portion	Portion		
SALARIES & WAGES		989.92	100,406.36	101,396.28
OVERLOAD		9,738.00	19,805.30	29,543.30
CASUAL POOL		39,267.45	125,375.41	164,642.86
STUDENT HELP		35,208.40	59,281.19	94,489.59
FRINGE BENEFITS	1222	1,573.03	53,398.12	54,971.15
SERV - FEE BASIS	000000000000000	8,811.51	-	8,811.51
MATERIALS & SUPPLIES		15,677.55 - -	2,393.07 30,525.52 24,372.00	18,070.62 30,525.52 721,872.00
REPAIRS				
STIPEND (I/C Exempt)				
OTHER	<u>0000000000000000000000000000000000000</u>	10,887.40	35,499.89	46,387.29
SUB TOTAL	697,500.00	122,153.26	451,056.86	1,270,710.12
INDIRECT COST		928.89	138.34	1,067.22
TOTAL COST	697,500.00	123,082.15	451,195.20	1,271,777.34





### **Audit Requirements**

- As the University expends \$750K+ in federal expenditures during its fiscal year, the University is required to have a single audit conducted.
- All financial records, supporting documents, and all other records pertinent to a Federal award must be retained for a period of three years from the date of submission of the last HEERF grant's final expenditure report.
- More information regarding Single Audits is available at the Office of Inspector General's Single Audit webpage here (<u>Single Audits</u> (ed.gov)).





## **Reference Materials: USDOE HEERF Guidance**

- <u>CARES Act: Higher Education Emergency Relief Fund</u>
  - HEERF Certification and Agreement (NOTE: This represents our official agreement for all HEERF funds)
    - Student Portion (CARES HEERF Certification and Agreement FINAL OMB Approved 04.09.2020 (002).for issuance)
    - Institutional Portion (HEERF Recipient's Funding Certification and Agreement (ed.gov))
    - MSI Portion (<u>Recipient's Certification and Agreement Section</u> 18004(a)(3) CARES Act (ed.gov)



## **Reference Materials: USDOE** (CRRSAA: HEERF II guidance):

- <u>CRRSAA: Higher Education Emergency Relief Fund II</u> (HEERF II)
  - Updated FAQs (updated March 19, 2021): <u>updated faqs</u>
     <u>heerf II</u>
  - Loss revenue FAQs: <u>heerf lost revenue faq (ed.gov)</u>





### **Reference Materials**

- The following provides a good high-level overview of current regulations associated with HEERF/CRRSAA funding: <u>https://www.nacubo.org/Topics/Risk-Management-and-Campus-</u> <u>Security/Emergency-Preparedness/COVID-19-Telephone-Town-Hall</u>
- Uniform Guidance (Electronic Code of Federal Regulations (eCFR))
  - NOTE: Uniform Guidance consolidates all Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards at 2 CRF Part 200.



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