



Policy & Procedure

PURPOSE & OVERVIEW

The *Higher Education Emergency Relief Fund II (HEERF II)* is authorized by the *Coronavirus Response and Relief Supplemental Appropriations Act, 2021 (CRRSAA)*, Public Law 116-260, signed into law by President Donald J. Trump on Dec. 27, 2020. In total, the *CRRSAA* authorizes \$81.88 billion in support for education, in addition to the \$30.75 billion former Secretary DeVos expeditiously provided last spring through the *Coronavirus Aid, Recovery, and Economic Security (CARES) Act*, Public Law 116-136.

All previous unexpended *CARES Act* funds, both student share and institutional share, may be used in the same way they are permitted to be used under the HEERF II rules. All awards made under *CRRSAA* rules, including previously unencumbered *CARES Act* funds, shall be labeled *CRRSAA*. The College reserves the right to award all previously unencumbered *CARES* funds during the spring 2021 academic semester and to relegate supplemental *CRRSAA* funds to solely the fall 2021 academic semester, or to spend portions of supplemental *CRRSAA* funds in both the spring 2021, summer 2021, and fall 2021 academic semesters, as it deems necessary. The College shall continue to make awards to eligible students, in accordance with this Policy & Procedure, until all available *CRRSAA* & *CARES Act* funds are depleted, there are no more eligible students to award, the funds expire, or this Policy & Procedure is retired and replaced by a College Policy & Procedure that accommodates federal awarding permissions under the *American Rescue Plan Act (HEERF III)*, whichever comes first.

HOW THE POPULATION OF ELIGIBLE STUDENTS IS DETERMINED

CRRSAA grants may be used for any component of the student's cost of attendance (COA) or for emergency costs that arise due to coronavirus, such as tuition, food, housing, health care (including mental health care), or childcare. The College has determined it shall issue grants to eligible students based on components within in the COA and not emergency expenses.

Additionally, *CRRSAA* requires that Northwest College prioritize students with *exceptional need*, such as students who receive Pell Grants, in awarding these grants to students. Finally, the College is permitted to define "exceptional need" in methods other than Pell grant eligibility. Therefore, the College has determined that three student groups define the College's response to prioritizing grants to students with *exceptional need*.

The three groups are:

1. At the time of initial eligibility determination, students whose valid 2020-21 9-month, full academic year Expected Family Calculation (EFC) is less than, or equal to, a "generalized" 2020-21 Cost of Attendance (COA) calculation based on their:
 - a. residency (in-state, Western Undergraduate Exchange (WUE), out-of-state); and,
 - b. living arrangements (on-campus, off-campus); and,
 - c. enrollment status (cumulative registered active academic semester credit load) during the academic semester for which a grant is considered, at the time of initial eligibility determination; and,
 - d. "add-on" tuition & fee costs exclusive to specified program enrollment.
2. At the time of initial eligibility determination, students who are participating in the *GEAR UP* program during the academic semester for which a grant is considered and does not get a grant under the EFC review in bullet #1; or,
3. At the time of initial eligibility determination, students who are participating in the *TRiO* program during the academic semester for which a grant is considered and does not get a grant under the EFC option is bullet #1.

HOW ELIGIBILITY DETERMINATIONS ARE MADE

To be eligible for grant consideration, a student must:

1. Be enrolled in an academic credit-bearing certificate or degree program and not be enrolled through concurrent or dual enrollment; and,
2. Be enrolled in academic credit-bearing courses in the current academic semester, after the add/drop period for the current academic semester ends and at the time of grant consideration; and,
3. Be a US citizen or eligible non-citizen, as determined by the *Free Application for Federal Student Aid (FAFSA)*, applicable to the award year which contains the academic semester for which the grant is considered; and,
4. Meet one of the following:
 - a) Have a valid 2020-21 *Institutional Student Information Record (ISIR)* on file within the College database and have a 9-month EFC that is less than, or equal to, the student's Generalized 9-month Cost of Attendance (COA) calculation for the 2020-21 academic year. Valid *ISIR* is defined as having the validity & accuracy of the most recently received 2020-21 *Expected Family Contribution (EFC)* confirmed through the College's verification process. Generalized 9-month COA is defined as applying uniform cost assumptions to all students with like characteristics at the time of grant consideration:
 - i. Residency review: in-state / WUE / out-of-state
 - ii. Living Arrangements review: living on campus? (Y/N)



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- iii. Enrollment Status re-calculation: active semester credits at time of report pull (FT/QTR/HT/<HT)
- iv. Add-On tuition & fee cost review: for specified majors; or,
- b) Be a current participant in the College’s *GEAR UP* program (EFC irrelevant); or,
- c) Be a current participant in the College’s *TRiO* program (EFC irrelevant).

Eligible students may receive only one (1) award under this Policy & Procedure per federal award year. All determinations of eligibility made by the College’s Financial Aid Office at the time of student eligibility calculation are final and cannot be appealed.

HOW GRANTS ARE AWARDED

If a student has been confirmed to meet eligibility requirements for grant funding, the student shall be awarded:

1. a predetermined, standardized grant amount, based on their 2020-21 9-month EFC, commensurate to all other awardees who have the same EFC; or
2. a predetermined, standardized grant amount commensurate with other eligible *GEAR UP* & *TRiO* participants, if the student has not received a grant under bullet #1.

Predetermined, standardized grant amounts, by *EFC* range or *GEAR UP/TRiO* enrollment (if not awarded under *EFC* range), prorated by enrollment status:

EFC	FT \$*	QTR \$*	HT \$*	<HT \$*
0	\$1,100	\$825	\$550	\$275
1-2999	\$1,000	\$750	\$500	\$250
3000-4999	\$900	\$675	\$450	\$225
5000-7999	\$800	\$600	\$400	\$200
8000+	\$700	\$525	\$350	\$175
GEAR UP & TRiO (who are not awarded under the EFC buckets above)				
	\$700	\$525	\$350	\$175

**The College reserves the right to modify grant award amounts at its discretion, at any time, without notice.*

HOW GRANTS ARE DISBURSED TO GRANT RECIPIENTS

Awardees receive grants through the following process:

1. The Financial Aid Office shall enter an awarded *CRRSAA* grant into the student’s *AIDE* data fields within the College’s *Colleague* student database, using unique award coding to identify if the grant is funded by CARES Act funds unencumbered prior to 2.16.21, or from supplemental *CRRSAA* funds, as expiration dates between fund sources differ.
 - a. Award Code “CA/CR” – Unencumbered CARES Act grants (which expire April 2021) awarded & disbursed under applicable *CRRSAA* policy & procedure.
 - b. Award Code “CRSAP” – *CRRSAA* funds (which expire January 2022) awarded & disbursed under applicable *CRRSAA* policy & procedure.
2. The Business Office monitors *CRRSAA* Award Code transmissions to generate an ad-hoc paper check that is mailed to the preferred address that the student recorded in their *Ellucian Colleague* records, or an electronic fund transfer (EFT) to the student’s bank account on file (if authorized by the student).

The College maintains its system of checks & balances, and adheres to all Title IV cash management rules, by keeping student eligibility review & awarding separated from disbursement to the student under its Title IV administrative capability best practices.

TRACKING & REPORTING

All *CRRSAA* eligibility determinations are housed within a digital repository on the College secure network. Extraction of data is used to meet all reporting requirements as specified, in conjunction with an FCAR of disbursed awards (summary of CA/CR & CRSAP Award Codes with the College’s *Colleague* student database) and other College reports.

- The Financial Aid Office is responsible to track/report:
- awarded students
 - justification(s) for a student’s award
 - how the student’s award amount was determined

- The Business Office is responsible to track/report:
- dates of student award disbursement
 - confirmation of award receipt to the student (documentation of cashed paper check or receipt of EFT)