



Higher Education Emergency Relief Fund III - 2021

Student Funds Distribution Policy & Process

The U.S. Department of Education (DOE) has provided emergency relief funding (HEERF III) that is now available to Northwestern College (NC) students and graduates (those who attended NC on March 13, 2020 or later) who need financial support for their expenses related to the disruption of campus operations and their education due to the Coronavirus.

Background Information. The Higher Education Emergency Relief Fund (“HEERF”) was established in March of 2020, originally financed through the federal Coronavirus Aid, Relief, and Economic Security Act (“CARES Act”). It was established to provide direct emergency cash grants to college students whose lives and education had been disrupted by the Coronavirus outbreak. Those CARES Act/HEERF I funds were received for NC students in May 2020 and have been depleted. In December 2020 the Coronavirus Response and Relief Supplemental Appropriations Act” (CRRSAA) was signed into law, creating the HEERF II fund; the College immediately applied for the \$684,067 designated for NC student relief, but those funds have yet to be received by the College.

In March of 2021, the American Rescue Plan Act of 2021 (“ARP”) became law, providing additional emergency relief for students/graduates with the incorporation of HEERF III, in order to prevent, prepare for, and respond to the coronavirus. At minimum, eligibility for this new HEERF III emergency funding is open to *“any individual who is or was enrolled at an eligible institution on or after March 13, 2020, the date of declaration of the national emergency due to the coronavirus.”* These funds may 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, healthcare (including mental health care), or childcare. Unlike other HEERF grants, HEERF III can also be put towards a student’s outstanding balance at their higher education institution, but only if directed in writing that the student chooses to put all or a portion of their HEERF grant towards paying down their balance. The decision of how to spend these funds is 100% up to the recipient but must be in accordance with the parameters set out in ARP.

As part of the HEERF III Student Emergency Relief Grant application process, students/graduates will be asked to confirm their agreement to spend the funds in accordance with the requirements of the ARP Act, and for those applying, confirm they have Eligible Expenses as described above, and if requested by NC, third-party independent auditors (as required by ARP), or any federal agency, be able to produce proof to substantiate those expenses.

The Congress delegated these Student Emergency Relief Funds to the DOE and charged them with working with colleges and universities to disseminate. For students/graduates to receive these funds, their college/university must submit an application, including a signed certification affirming they will distribute the direct emergency cash grants to their students/graduates in accordance with applicable law. Colleges and universities that submit such application will be charged with determining who should receive grants, while upholding the Congressional intent that such funds be provided to the neediest students/graduates whose lives and educations have been disrupted by the Coronavirus outbreak.

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THE POLICY

Immediately following passage of the federal American Recovery Plan Act (ARP) and establishment of HEERF III, NC applied for student emergency funds that had been set aside for NC students/graduates in the amount of \$ \$434,422.00 (the amount determined by the DOE formula and reported to NC). These funds were finally

received by the College in late July and plans to distribute them commenced, with the intent to distribute during the fall quarter.

NC established the *Higher Education Emergency Relief Fund III (HEERF III) Policy Committee* to review these new parameters set out by the Congress in ARP - as modeled on CARES Act HEERF I - and to draft a policy to determine how these emergency relief funds would be managed and dispersed to eligible NC students/graduates. ARP required the College to ***base dispersal of funds on financial need, prioritizing students/graduates with exceptional need, such as those who receive(d) Pell Grants or are undergraduates with extraordinary financial circumstances.***

The Committee was charged with establishing an application process to help determine and prioritize student/graduate need. The College could no longer divide the funds equally amongst all those eligible (as it had with HEERF I grant funds), which meant the Committee needed to create an application process. The application period will span over a 2-week period to ensure that the grant funds will get to student/graduate hands as quickly as possible. Failure to apply would result in forfeiture of the opportunity, with unused monies poured back into the NC HEERF III available funds to be utilized by other eligible NC students/graduates.

The Committee considered multiple options to disperse grant funds and chose to utilize a **Hybrid Process** that will include:

1. An auto-generated list of HEERF III grant recipients pursuant to Pell Eligibility and Estimated Family Contribution (EFC) would be contacted and advised that they ***have been awarded*** a HEERF III emergency relief grant in an amount determined by their specific EFC determination.

And simultaneously,

2. All other eligible (as defined below) students/graduates who do not fall into the auto-generated Pell/EFC determinative amounts in #1 above would be invited to ***submit an application*** identifying parameters they (or in some instances, members of their immediate household) have suffered due to the Coronavirus pandemic. Applicants would attest that if requested by NC, a third-party independent auditor (as required by ARP), or any federal agency, they would be able to provide documentation/proof of their claims made in the application.

THE PROCESS

- **Eligibility.** Determine the list of all NC students and/or graduates eligible to participate. To be eligible to receive a HEERF III Student Emergency Relief Grant, a student must meet both of the eligibility criteria for an *Enrolled Student* as listed below:
 1. The student was enrolled at NC on or after March 13, 2020.
 2. For purposes of this NC HEERF Policy & Procedures document, an “enrolled” student is defined as:
 - i. a student who, after March 13, 2020, received a letter grade (A, B, C, D, F, or P) related to an NC course; or
 - ii. A student who is new or re-admitted for the FA21 quarter and actively participates in the quarter after the call of the census period.
- **Use of Grant Award.** Grants awarded may be used (per ARP) *“for any component of the student’s cost of attendance or for emergency costs that arise due to coronavirus, such as tuition, food,*

housing, healthcare (including mental health care), or childcare.” HEERF III grants can also be put towards a student’s outstanding NC balance, but only if directed in writing. It is up to the recipient how to spend their award.

- **Timeline.** Initial emails for both categories of eligible recipients/applicants (auto-generated recipients per Pell/EFC and all others invited to apply) will be sent simultaneously on October 25th, with a 2-week deadline to respond/accept or submit an application. Responses received after the November 7th 11:59pm deadline will not be considered. This notification is no guarantee that a grant will be awarded – all deadlines and requirements in the notification must be met, including those identified below under Dispersal of Funds.
- **Dispersal of Funds, Pick Up of Award, & Mandatory Stipulations.** Grant funds will be provided to successful recipients in the form of a check. The following stipulations are mandatory and if not complied with, lead to forfeiture of any grant awarded: 1)Checks must be picked up in person at Bridgeview Campus (checks will only be given to the recipient); 2)Checks must be picked up on one of 7 days identified in notification and award emails (checks will not be mailed); 3)Photo identification must be presented in order to pick up check (Driver’s License or State ID); 4)Complete a form provided at pick-up, including attesting (via signature) to spend the funds per ARP, and for recipients pursuant to an application (not *recipients* per Pell/EFC), that if requested by NC, third party auditors or federal agencies that they can provide documentation to substantiate their specific circumstance parameters experienced as marked in their application; and 5)(*if applicable*)Confirm in writing the exact amount of their award they requested be put towards their outstanding balance (as required by ARP).

Checks not picked up on the last day will be considered forfeited and the funds will be placed back into the NC HEERF III available funds to be dispersed to other eligible NC students/graduates in need.

- **60-Day Period to Cash Checks.** All emergency relief grant checks will be **valid for 60 days** from the date the check was issued. Checks not cashed by recipients within 50 days after written (10 days prior to the 60-day deadline to cash) will be identified and 2 attempts will be made to reach recipients. After two unsuccessful attempts to reach recipient about cashing the check, and upon passing the 60-day deadline, checks not cashed will be voided and the funds returned to the NC HEERF III available funds to be re-allocated to other eligible NC students and/or graduates in need.

GROUP 1 – Auto-generated RECIPIENTS Pursuant to Pell/EFC

The Recipients. Recipients will be determined upon inclusion of individual Pell/EFC data into the data table of all eligible students and/or graduates (as defined above); persons with an EFC number 9,000 or under would be considered “Recipients” (all remaining would be placed into Group 2 (see below) with the ability to submit application for consideration).

The Award. Grant Award categories and amounts for compliant Recipients will be as follows:

EFC of 0	... \$TBD
EFC of 1 - 3000	... \$TBD
EFC of 3001 - 6000	... \$TBD
EFC of 6001 - 9000	... \$TBD

Specific grant amounts to be awarded by category will be determined following the close of the 2-week response period, and pursuant to total number of NC response by deadline.

Initial Notification of Grant Award. An email notification of potential grant award for eligible Recipients will be sent to the NC student email of existing NC students and the last known personal email address on file for all other students and/or graduates. The notification will advise the recipient they have been awarded a Student Emergency Relief Grant (HEERF III) and that they have a 2-week deadline to accept or reject it. If no response is received, the grant will be considered forfeited, and funds re-allocated to other eligible NC students/graduates.

The email notification will further identify **steps the Recipient must take within the 2-week deadline** in order to receive the award. *(See general terms identified under “The Process”)*

Notification of Amount of Grant Awarded & Pick Up Instructions. Approximately 10 days following the deadline to respond to the notification of grant award email, timely respondents will be sent a follow-up email notifying them of the exact amount of the grant they have been awarded and reminding them of all mandatory check pick-up requirements and stipulations. *(See above under “The Process”)* Recipients that choose to designate a specific portion of their award be put towards their NC balance will be invited to click on a link where they will specify the exact amount of their grant they would like to put towards it.

GROUP 2 – APPLICATION PROCESS for All Other Eligible Students and/or Graduates

Eligible Applicants. All eligible students and/or graduates (as defined above) who did not automatically fall into one of the Pell/EFC categories outlined in Group 1 – those with no identifiable EFC number or with an EFC number over 9,000 - will be eligible to submit an application seeking student emergency relief grant funds (HEERF III).

The Personal Circumstance Parameters. The Committee set a list of circumstances that students (or members of their immediate household) may have incurred as a result of the Coronavirus pandemic, touching upon health, employment, housing, food, childcare, income, higher education, and other direct and indirect effects as a result of the pandemic. *“Members of Immediate Household”* are defined as persons who reside within the student/graduate’s permanent place of residence and are either related as family or signatories on the lease/mortgage of the premises. Applicants will be asked to identify whether they encountered/experienced any of the 12 Parameters listed.

The Award. Grant Award categories for the application and award amounts for successful applications will be as follows:

One to Four Parameters Met	... \$TBD
Five to Seven Parameters Met	... \$TBD
Eight or More Parameters Met	... \$TBD

Specific grant amounts to be awarded by category will be determined following the close of the 2-week response period, and pursuant to total number of NC responses by deadline for categories identified in Groups 1 & 2. Applications will be considered and awarded in order of submission, and until all HEERF III grant funds are depleted; once depleted, applications will be denied.

Notification of Application for Grant Award & Steps Required to Be Considered. An email notification of grant award *application* will be sent to all eligible NC students and/or graduates (as defined above) to the student email of existing NC students and to the last known personal email address on file for all other students and/or graduates. The notification will advise of their eligibility to apply for a student emergency grant (but is no guarantee of a grant being awarded to them). The notification email will contain a link to an application that must be completed by a 2-week deadline. Those who do not receive an email with the link to their personalized application and who believe they are eligible can contact the NC Emergency Relief Committee at emergencyaid@nc.edu. If eligibility is determined that student/graduate will be sent an email with their personalized link to apply.

The email notification will further identify steps the applicant must take in order to be considered for the grant award, including identifying all Personal Circumstance Parameters that students (or members of their immediate household) may have incurred as a result of the Coronavirus pandemic as well as all other general terms listed above under “The Process”. If a grant is awarded, recipients will not be required to provide supplemental documentation to substantiate their personal circumstances and demonstrate need but *must be able to provide* such documentation if later requested by NC, a third-party independent auditor (as required by ARP), or any federal agency.

Notification of Application Outcome & Further Directions. Approximately 10 days following the deadline to submit the application for a grant award, those who successfully complied with the 2-week deadline will be sent a follow-up email to either notify them of the exact amount of the grant they have been awarded, or to advise that their application was not successful. Successful applicants will be reminded of all mandatory check pick-up requirements and stipulations (*See above under “The Process”*). Successful applicants who would like to designate a specific portion of their award be put towards their NC balance will be invited to click on a link where they will specify the exact amount of their grant they would like put towards it.

Mandatory Reporting. In accordance with CARES & ARP requirements, Reports will be generated and submitted to the DOE identifying all emergency grant fund recipients and any other information as requested.

Excess HEERF III Funds & Amendment of Policy. In accordance with the Congressional intent set out in the CARES & ARP Acts, should additional relief funds be made available to students in the future, this *2021 Higher Education Emergency Relief Fund HEERF III Distribution Policy & Process* may be amended to ensure relief to the neediest eligible NC students/graduates adversely affected in connection with the disruption of their lives and education as a result of the Coronavirus outbreak.

All questions, comments, or concerns in connection with any HEERF emergency relief funds for NC students/graduates should be directed to Government & Public Relations Director Laura Pollastrini and the Emergency Relief Committee at emergencyaid@nc.edu.