

CARES Act Higher Education Emergency Relief Fund (HEERF) Timeline

Key

- NEW Guidance
- ! Changed Guidance
- / Combination of New and Changed Guidance
- 📢 Call for Comments

FRIDAY, MARCH 5, 2020 ● NEW

The Department of Education (ED) issues first COVID-19 related [guidance](#), covering [interruptions of study](#), due to COVID-19.

New guidance:

- Broad approval to offer distance education.
- Institutional authority to continue paying Federal Work-Study (FWS) to students who are unable to work.
- Leave of Absence (LOA), Professional Judgment (PJ), Satisfactory Academic Progress (SAP), & Return of Title IV funds (R2T4).

FRIDAY, MARCH 13, 2020

President Donald Trump issues a [proclamation](#) declaring a national emergency.

FRIDAY, MARCH 20, 2020 /

ED adds FAQ document to March 5 guidance.

Changes to previous guidance:

- Extending applicable dates of March 5 guidance.

New guidance:

- Treatment of institutional charge refunds.
- Clock-hour programs.
- Administration of Title IV aid for shortened academic years.

FRIDAY, MARCH 27, 2020 ● NEW

Trump signs the Coronavirus Aid, Relief, and Economic Security (CARES) Act into law. The CARES Act includes \$14 billion in funding for higher education through the Higher Education Emergency Relief Fund (HEERF).

FRIDAY, APRIL 3, 2020 /

ED issues updated [guidance](#) related to interruptions of study due to COVID-19.

Changes to previous guidance:

- Extending applicable dates of March 5 guidance.

New guidance:

- Paying FWS to students who are unable to work.*

New guidance:

- Waiver of in-person/notary requirements for V4/V5 verification identification documentation.

THURSDAY, APRIL 9, 2020 ● NEW

ED issues [certification agreement](#) and [letter](#) from Secretary of Education for student portion of CARES Act HEERF funds. Schools are told they can submit their agreements immediately and that the first funds would be pushed out within the week. DeVos urges schools to "promptly make available emergency financial aid grants from the advanced funds directly to students..."

New guidance:

- ED states, with respect to student eligibility, "The CARES Act provides institutions with significant discretion on how to award this emergency assistance to students. ... The only statutory requirement is that the funds be used to cover expenses related to the disruption of campus operations due to coronavirus.
- Reporting: Schools must submit a report to ED on HEERF student emergency grant spending within 30 days from the date they signed the agreement.

TUESDAY, APRIL 21, 2020 !

ED issues [certification agreement](#), [press release](#), and [FAQ](#) for institutional portion of CARES Act HEERF funds, and a [student-fund FAQ document](#).

Changes to previous guidance:

- Students must meet Title IV eligibility requirements in order to receive CARES Act funds.*

THURSDAY, APRIL 23, 2020: /

ED issues [guidance](#) on cohort default rate appeals, and the FWS community service requirement.

Changes to previous guidance:

- Waiver of 7% community service requirement for the FWS program for award years 2019-20 and 2020-21.

New guidance:

- Extension of fiscal year (FY) 2017 cohort default rate appeal deadline.

THURSDAY, APRIL 30, 2020 ● NEW

ED issues certification agreement and letter from DeVos for Minority Serving Institutions (MSIs) portion of CARES Act HEERF funds.

New guidance:

- Students can self-attest that they meet all of the HEA Section 484 Title IV eligibility requirements for the MSI portion of CARES Act HEERF funds.

TUESDAY, MAY 6, 2020 !

ED issues interim HEERF student share web-based disclosure guidelines, while it develops the reporting process required by the CARES Act.

Changes to previous guidance:

- Disclosure format vs. report to ED.
- Additional items to be disclosed.

FRIDAY, MAY 15, 2020 /

ED issues updated [guidance](#) related to interruptions of study due to COVID-19.

Changes to previous guidance:

- Extending applicable dates of broad approval to offer distance education.

New guidance:

- Institutional authority to accept a signed and dated statement from the applicant in which they attest to their secondary school completion or the equivalent for purposes of V4/V5 verification.
- Authority granted in CARES Act to exclude from SAP quantitative component attempted credits that a student was unable to complete due to COVID-19.
- CARES Act waiver of LOA requirement that requires students in term-based programs to resume at the same point in the academic program that they began the LOA.
- R2T4 payment period effective dates for eligibility for waiver of requirement to return funds.*

THURSDAY, MAY 21, 2020 !

ED updates HEERF [informational page](#).

Changes to previous guidance:

- ED will not enforce the portion of its guidance that says students must be, or could be, Title IV eligible in order to receive HEERF student emergency grant funds.

MONDAY, MAY 25, 2020 !

ED [responds](#) to the legal challenge brought forth by the California Community Colleges system regarding Title IV eligibility requirement imposed on CARES Act HEERF student emergency grants.

Changes to previous guidance:

- HEERF guidance is 'preliminary' and again reiterates that ED will not enforce the Title IV eligibility requirement.

WEDNESDAY, MAY 27, 2020 📢

ED publishes two notices in the Federal Register seeking comments on the Funding Certification and Agreement forms for both the [student](#) and [institutional](#) aid included in the CARES Act. Despite the CARES Act requiring schools to submit reports to the Secretary describing their use of funds, ED's notices only reiterate the May 6 guidance on web-based disclosure guidelines and do not include requirements on reporting directly to ED.

TUESDAY, JUNE 16, 2020 !

ED updates its [March 5](#) guidance and [May 15](#) guidance.

Changes to previous guidance:

- Expands flexibilities for standard term programs and extends the timeframe for those flexibilities
- Extends the timeframe for relief from R2T4 requirements
- Clarifies how the R2T4 relief provisions may or may not be applied

WEDNESDAY, JUNE 17, 2020 ! 📢

The interim final rule from ED (released for preview on June 11) declaring the distribution of coronavirus emergency relief grants to students can only go to those who meet Title IV eligibility requirements is published in the Federal Register. The rule is now effective and is open for a 30 day comment period.

FRIDAY, JUNE 12, 2020 !

Preliminary injunction granted in WA lawsuit challenging ED's student eligibility requirements for CARES Act emergency grants.

FRIDAY, JUNE 17, 2020 !

Preliminary injunction granted in CA community college lawsuit challenging ED's student eligibility requirements for CARES Act emergency grants.

TUESDAY, JUNE 30, 2020 ● NEW

ED releases CARES Act Section 18004 Supplemental FAQ

New guidance:

- Confirms HEERF funds can be awarded as grants to students for summer and fall terms

THURSDAY, JULY 9, 2020 /

ED issues Electronic Announcement on non-tax filer flexibilities and program review risk-based model during Covid-19 national emergency

Changed guidance:

ED announces that foster care youth who are non-filers can provide a signed statement that they earned less than the amount that triggers the requirement for taxpayers to file tax returns, in place of W-2 forms.

New guidance:

ED announces it will adjust program review risk-based model to account for increases in PJ due to Covid-19 for AY 2019-20 and 2020-21

FRIDAY, JULY 10, 2020 ● NEW

ED states that Federal Funding Accountability and Transparency Act (FFATA) reporting satisfies CARES quarterly reporting requirement

ED issues institutional reporting deadline extensions

New guidance:

- Deadline extension to December 31, 20 to Annual Security Reports, Annual Fire Safety Reports, & Annual Equity in Athletics Survey
- FISAP deadline extended to November 2, 2020

WEDNESDAY, JULY 29, 2020 ● NEW

ED publishes proposed annual data collection form for HEERF recipients in the Federal Register for public comment

THURSDAY, JULY 30, 2020 ● NEW

ED announces Phase I of coronavirus-related system changes to COD

New guidance:

- Adds Coronavirus Indicator to be applied to the disbursement level of DL, Pell, and TEACH awards to apply CARES Act cancellations and exclusions from lifetime eligibility limits
- Adds Coronavirus Indicator to the COD R2T4 calculator tool, requiring schools to use COD R2T4 calculator for all Covid-19 related withdrawals, including R2T4 calculations that occurred prior to the update

MONDAY, AUGUST 3, 2020 ● NEW

ED releases FISAP Instructions to account for CARES Act flexibilities to campus-based funds

WEDNESDAY, AUGUST 5, 2020 !

ED provides NASFAA with unofficial confirmation that most schools are exempt from FFATA reporting requirements

THURSDAY, AUGUST 6, 2020 !

ED updates [June 30 CARES Act Section 18004 Supplemental FAQ Question 1](#)

Changed guidance:

- Corrects deadline by which schools must spend HEERF funds from 9/30/2022 to one year from the date of award in the institution's Grant Award Notice

FRIDAY, AUGUST 21, 2020 !

ED extends deadlines for Covid-19 related flexibilities through the end of the payment period that includes December 31, 2020 or the end of the payment period that includes the end date for the Federally-declared emergency related to COVID-19, whichever occurs later, with special exceptions outlined for:

- Campus-based matching requirements
- LOA
- R2T4
- Foreign institutions offering distance education
- Academic Calendars
- Reporting and Audit Requirements

MONDAY, AUGUST 31, 2020: /

ED issues update to May 6 Electronic Announcement

New guidance:

- Adds a definition and methodology for calculating "total number of eligible students" for institutions to use in HEERF student share website reporting

Changes to previous guidance:

- Changes HEERF student share website reporting from every 45 days to no more than 10 days following the end of the calendar quarter

TUESDAY, SEPTEMBER 8, 2020 !

ED updates [June 30 CARES Act Section 18004 Supplemental FAQ Question 5](#)

Changed guidance:

- Clarifies that the Institutional Portion of an IHE's 18004(a)(1) award may be used for student scholarships in certain limited circumstances

WEDNESDAY, SEPTEMBER 23, 2020 !

ED announces Phase II of COD coronavirus-related system changes

Changed guidance:

- Updates July 30 announcement of Phase I of COD coronavirus-related system changes
- Extends payment period start date back to July 1, 2019 (from January 1, 2020) for terms eligible to have Coronavirus Indicator set at disbursement level
- Removes requirement that schools use the COD R2T4 calculator tool until ED identifies other options for reporting aid not returned due to the CARES Act

WEDNESDAY, SEPTEMBER 23, 2020 ● NEW

ED sends email to HEERF recipients clarifying use of funds and reporting requirements

New guidance:

- Clarifies that purchase of Personal Protective Equipment (PPE) is an allowable use of Institutional Share of HEERF funds
- Confirmation that FFATA reporting is likely not required for most institutions and that QBER will satisfy CARES Act quarterly reporting requirements

MONDAY, SEPTEMBER 28, 2020 ● NEW

ED releases proposed Quarterly Budget Expenditure Report (QBER) form for HEERF funds for public comment and requests emergency OMB clearance.

FRIDAY, OCTOBER 2, 2020: ● NEW

ED issues Higher Education Emergency Relief Fund (HEERF) Round 3 Frequently Asked Questions

New guidance:

- Clarifies that any student eligible to participate in Title IV programs, as demonstrated by the school having received an ISIR for that student, or through the use of an alternative application or certification developed by the institution, may receive funding under the CARES Act section 18004(a), and that a student who had reached aggregate Pell or DL limits may still receive HEER emergency grants.
- States that ED will not take enforcement action on institutions who awarded HEER funds prior to June 17, 2020 contrary to the criteria set forth in the June 17 IFR
- States that ED will reclaim unspent HEER funds after 90 days following the end of the one calendar year timeframe within which institutions had to spend such funds
- Announces availability of no-cost extensions to institutions who were unable to spend HEER funds within the calendar year timeframe

MONDAY, OCTOBER 5, 2020 !

ED updates [March 20 Covid-19 Title IV Frequently Asked Questions](#)

Changed guidance:

- ED will permit institutions (with prior written authorization from the student) to apply a student's credit balance from a coronavirus-related withdrawal for which the institution does not return funds to reduce Direct Loan disbursements received for attendance at the institution for periods prior to the payment period in which the student withdrew.

TUESDAY, OCTOBER 6, 2020 ● NEW

ED updates July 30 EA announcing coronavirus-related COD system changes with instructions on how to re-open closed award years in COD

TUESDAY, OCTOBER 13, 2020 /

ED releases revised, final Quarterly Budget Expenditure Report Form, with first submission due October 30, 2020

MONDAY, OCTOBER 19, 2020 ● NEW

ED sends email to HEERF institutional recipients summarizing new QBER requirement with new FAQs

*Indicates that changed guidance introduced the possibility that institutions would be retroactively out of compliance, or required institutions to undo previously-completed work.

Updated as of October 28, 2020



The National Association of Student Financial Aid Administrators (NASFAA) is a nonprofit membership organization that represents more than 28,000 financial aid professionals at nearly 3,000 colleges, universities, and career schools across the country. NASFAA member institutions serve nine out of every 10 undergraduates in the United States. Based in Washington, D.C., NASFAA is the only national association with a primary focus on student aid legislation, regulatory analysis, and training for financial aid administrators. For more information, visit www.nasfaa.org.