



CRRSAA Act Higher Education Provisions: Initiatives and Resources to Provide Relief to Students and Institutions

Last Updated, January 25, 2021

On December 21, 2020, Congress passed the Coronavirus Response and Relief Supplemental Appropriations Act (CRRSAA), along with appropriations to fund the federal government through the end of fiscal year 2021. This is a *preliminary* summary of the CRRSAA key higher education provisions, and does not include all information on the FY 2021 appropriations bill.

EDUCATION STABILIZATION FUND, Section 311(a) of CRRSSA

The [Education Stabilization Fund](#) (ESF) was established with the passage of the CARES Act in March, 2020, and four grant programs were created. Through CRRSAA, \$81.88 billion was allocated to this fund for K-12 schools, colleges and universities; the higher education components are summarized below.

Higher Education Emergency Relief Fund (HEERF) II, Section 314(a) of CRRSSA

The CRRSAA, through Section 314(a), allocated \$22.7 billion to the [Higher Education Emergency Relief Fund \(HEERF\)](#). By comparison, the Coronavirus Aid, Relief, and Economic Security (CARES) Act included \$14 billion for the HEERF. The US Department of Education has posted information on [HEERF II funds supported through CRRSSA here](#), including the following FAQ on these funds:

- [CRRSAA HEERF II Section 314\(a\)\(1\) Frequently Asked Questions](#) (January 14, 2021)
- [CRRSAA HEERF II Section 314\(a\)\(4\) Frequently Asked Questions](#) (January 14, 2021)
- [HEERF I and HEERF II Comparison Fact Sheet](#) (January 14, 2021)

The majority of the HEERF funding (approximately \$20B) is expected to be distributed to public and private non-profit universities and their students. Students cannot apply for assistance directly from the U.S. Department of Education but should contact their institutions for further information and guidance. It is expected that these funds will be distributed by January 27, 2021. **Initial estimates anticipate approximately \$229 million will be available to Oregon public and private non-profit Oregon institutions and their students through HEERF II** (see expected institution allocations on page 3).

Like the CARES Act, funds are distributed by formula to institutions through grant programs that were established through CARES. Several changes were made in HEERF II from the original HEERF funding through the CARES Act.

- For existing private, nonprofit and public CARES Act grantees, the CRSSA authorized under Section 314(a)(1) supplemental awards to existing grants to support institutions and students. As under the CARES Act, the main formula would allocate 75% of funds based on an institution's relative share of Pell grant recipients. However the formula for HEERF funds was modified to equally weight full-time equivalent student counts and student headcounts. This change results in a higher percentage of resources being made available to community colleges, as larger proportion of their student body is comprised of part-time enrolled students.
- Institutions may use the supplemental funds for direct and indirect expenses that have been incurred due to Coronavirus, including lost revenue; however the CRRSAA provides more latitude to institutions in HEERF II to determine direct and indirect expenses. Some restrictions still apply; for example, funds may not be used for marketing or recruitment, capital outlays for athletics, religious worship, or executive salaries or benefits.
- Institutions will be required to distribute at least the same amount of student financial aid grants as they distributed under the CARES Act. Because the new law appropriates more funding overall, it is anticipated that a larger share of the allocation will be available for institutional support.
- It is not clear at this time how the interaction of CRSSA and other federal law will affect the distribution of aid to non-Title IV financial aid recipients. The distribution of funds to students may be the same as CARES (no funds to undocumented, international, Title IV eligible only), but this could be expanded under President Biden. HEERF funds are not subject to maintenance of effort provisions.
- There are special requirements for institutions paying the endowment excise tax.
- Proprietary institutions are not eligible for supplemental funding under 314(a)(1); these institutions must apply for awards under a new section, 314(a)(4). This separate funding stream may be used only for financial aid grants for students.

In addition, \$113 million was allocated to institutions with the greatest unmet need as determined by the Secretary of Education—this could provide some additional support to Oregon institutions. The “Other” funds column noted in the Table on page 3 will be updated when these numbers become available. An additional \$1.7 billion was authorized for institutions participating in Title III, parts A and B of Title V, and part A of Title VII of the Higher Education Act which includes historically black colleges and universities (HBCUs), tribal colleges and universities, minority serving institutions (MSIs).

Governor’s Emergency Education Relief Fund (GEER), Section 312(a) of CRRSAA

Through Section 312(a), a total of \$4.05 billion in ESF dollars are reserved for allocation to the [Governor’s Emergency Education Relief Fund](#) to be awarded to states based on a formula stipulated in the legislation. This includes \$2.75 billion set-aside for private K-12 schools. Dollars are discretionary for use in K-12 and higher education. The expectation is that Oregon stands to receive \$41.8 million in GEER II funds. The Office of the Governor is partnering with the Oregon Department of Education (ODE) and the Higher Education Coordinating Commission (HECC) to carry out grant activities related to GEER Fund. The funds are subject to maintenance of effort provisions that may be waived by USDOE for reasons of hardship. The provisions require the state to dedicate at least the same proportion of its budget in FY 22 to K-12 and higher education as the average proportion dedicated in FYs 17-19.

FINANCIAL AID POLICY PROVISIONS

Significant changes to federal student aid policy, including simplifying the Free Application for Federal Student Aid (FAFSA), expanding Pell Grant eligibility to incarcerated students, and more, were attached to the Consolidated Appropriations Act, 2021. The [National Association of Financial Aid Administrators](#) reports that provisions of the bill generally take effect on July 1, 2023, for award year 2023-24. Financial aid changes include but are not limited to the following:

- The legislation significantly reduces the number of questions a student may be required to complete the FAFSA, making it easier to apply for federal aid.
- The Second Chance Pell program, allowing incarcerated individuals to access federal financial aid dollars, is reinstated, having been discontinued in 1994.
- The legislation eliminates a longstanding provision that prohibits students with drug offenses from receiving federal student aid, and removes the requirement that male students must register with the Selective Service in order to be eligible for federal aid.
- The bill sets a new methodology for Need Analysis/Pell Grant Eligibility using the concept of a Student Aid Index (SAI) to replace the Expected Family Contribution (EFC), and makes several modifications to Cost of Attendance (COA) calculation. Among other impacts, changes will allow students to preview Pell eligibility in advance.
- Maximum Pell Grant eligibility will be tied to automatically-updated federal poverty standards. The changes are expected to increase the number of Pell Grant students eligible for the maximum award. The maximum Pell Grant is also increased by \$150 to \$6,495 for the 2021-2022 academic year.
- The FAFSA is simplified for homeless and former foster youth.
- The 150 percent program length limit will be removed on subsidized federal student loans.

The legislation does not include a statutory extension to the current student loan pause, which expires on January 31, 2021. See [the Federal Student Aid Coronavirus website](#) for more information.

Sources:

- US Department of Education [HEERF II funds supported through CRRSSA](#), January 2021
- [American Association of Community Colleges summary CRRSSA FAQ](#), December 2020
- American Public Land Grant University, [Analysis of the CRRSAA](#).
- [State Higher Education Executive Officers Association \(SHEEO\)](#), Zoom Call on 2021 Consolidated Appropriations Law, January 8, 2021.
- National Association of Student Aid Advisors, [NASFAA Deep Dive: Changes to Federal Methodology, Other Student Aid Changes From Spending Bill](#), December 2020.
- Brownstein, Hyatt, Farber, Shreck, [Summary of Higher Education Provisions in the Consolidated Appropriations Act of 2021](#), December 23, 2020.

ESTIMATED INSTITUTIONAL DISTRIBUTIONS

Distributions to Oregon Institutions, Higher Education Emergency Relief Fund (HEERF)								
	CARES Act - HEERF I (distributed in Spring 2020)				CRRSAA Act - HEERF II (to be distributed in January 2021)			
Institution	Student Aid	Institutional	Other	TOTAL	Student Aid (minimum)	Institutional (maximum)	Other (TBD)	TOTAL
Blue Mountain	483,431	483,431	62,998	1,029,860	483,431	1,521,185	-	2,004,616
Central	1,591,836	1,591,836	157,498	3,341,169	1,591,836	4,739,836	-	6,331,672
Chemeketa	2,875,369	2,875,369	367,244	6,117,982	2,875,369	9,737,203	-	12,612,572
Clackamas	862,463	862,463	86,637	1,811,563	862,463	4,696,098	-	5,558,561
Clatsop	222,421	222,421	55,159	500,000	222,421	856,325	-	1,078,746
Columbia Gorge	187,819	187,819	124,362	500,000	187,819	750,862	-	938,681
Klamath	349,657	349,657	34,515	733,829	349,657	1,582,790	-	1,932,447
Lane	1,507,133	1,507,133	149,155	3,163,421	1,507,133	7,436,058	-	8,943,191
Linn Benton	1,303,338	1,303,338	130,296	2,736,971	1,303,338	4,778,982	-	6,082,320
Mt. Hood	1,692,829	1,692,829	169,437	3,555,095	1,692,829	6,225,033	-	7,917,862
Oregon Coast*	-	-	-	-	-	-	-	-
Portland	6,269,372	6,269,372	619,774	13,158,517	6,269,372	23,518,273	-	29,787,645
Rogue	1,261,641	1,261,641	123,516	2,646,797	1,261,641	5,665,631	-	6,927,272
Southwestern	540,845	540,845	53,063	1,134,753	540,845	1,793,635	-	2,334,480
Tillamook Bay	157,889	157,889	184,222	500,000	157,889	314,127	-	472,016
Treasure Valley	498,832	498,832	63,480	1,061,144	498,832	1,966,050	-	2,464,882
Umpqua	560,927	560,927	54,817	1,176,670	560,927	2,032,469	-	2,593,396
Subtotal, Colleges	20,365,799	20,365,799	2,436,173	43,167,771	20,365,802	77,614,557	-	97,980,359
EOU	579,164	579,164	56,980	1,215,307	579,164	2,100,287	-	2,679,451
OIT	903,637	903,637	-	1,807,273	903,637	3,241,539	-	4,145,176
OSU	7,779,999	7,779,999	-	15,559,998	7,779,999	18,822,487	-	26,602,486
PSU	8,320,203	8,320,203	819,349	17,459,754	8,320,203	22,419,901	-	30,740,104
SOU	1,711,040	1,711,040	169,157	3,591,236	1,711,040	4,491,416	-	6,202,456
UO	8,047,973	8,047,973	-	16,095,946	8,047,973	16,102,896	-	24,150,869
WOU	2,140,842	2,140,842	209,895	4,491,578	2,140,842	4,918,999	-	7,059,841
OHSU	506,097	506,097	-	1,012,193	506,097	1,091,885	-	1,597,982
Subtotal, Universities	29,988,952	29,988,952	1,255,381	61,233,285	29,988,955	73,189,410	-	103,178,365
Private Institutions	12,999,977	12,999,977	3,645,688	29,645,642	8,002,126	19,965,021	-	27,967,147
TOTAL	63,354,728	63,354,728	7,337,242	134,046,698	58,356,883	170,768,988	-	229,125,871
*We believe OCCC is included with PCC because OCCC has only recently gained separate accreditation.								