

# 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

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

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.
- 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



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

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.



*\*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 June 8, 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](http://www.nasfaa.org).