

### Comparison of Higher Education Emergency Relief Funds (HEERF)

	HEERF I (CARES Act)	HEERF II (CRSSA Act)	HEERF III (ARP Act)
Required Student Spending	50.0 percent of an institution's allocation must be used to provide emergency financial aid grants to students	Institutions must use the same dollar amount for student grants as were required to use under the CARES Act. (For-profits must use 100.0 percent of their allocation for student grants.)	At least 50.0 percent of an institution's allocation must be used to provide emergency financial aid grants to students. <i>(For-profits must use 100.0 percent of their allocation for student grants.)</i>
Requirement to prioritize student need	Not required by law; however, US Department of Education guidance encouraged institutions to prioritize students with the greatest need.	Yes. The CRRSAA requires that institutions prioritize students with <b>exceptional need</b> , such as those who receive Pell Grants.	Yes. The ARP Act requires that institutions prioritize students with <b>exceptional need</b> , such as those who receive Pell Grants.
Allowable Uses of <b>Student Grants</b>	Direct emergency aid grants to students for eligible expenses related to the disruption of campus operations due to the coronavirus, such as food, housing, course materials, technology, health care, and child care.	Any component of a student's cost of attendance, and emergency costs due to coronavirus such as tuition, food, housing, healthcare (including mental health), and child care.	Any component of a student's cost of attendance, and emergency costs due to coronavirus such as tuition, food, housing, healthcare (including mental health), and child care.
Allowable Uses of <b>Institutional Portion</b>	Defray expenses due to significant changes in the delivery of instruction due to the coronavirus, and additional financial aid grants to students.	Defray costs associated with the coronavirus such as lost revenue, previously-incurred expenses, technology costs associated with shifting to distance education, faculty and staff training, and payroll. Can also be used for student support activities authorized by the Higher Education Act to address needs related to coronavirus, and for additional financial aid grants to students.	Defray costs associated with the coronavirus such as lost revenue, previously-incurred expenses, technology costs associated with shifting to distance education, faculty and staff training, and payroll. Can also be used for additional financial aid grants to students. A portion of the allocation <b>must be used for</b> implementing evidence-based practices to monitor and suppress the coronavirus, in accordance with public health guidelines, and to conduct outreach to financial aid applicants about the opportunity to receive a financial aid adjustment due to the recent unemployment of a family member or independent student, or other circumstances.

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Student Eligibility	The law did not delineate eligibility requirements; however, the U.S Department of Education guidance provided that students must meet Title IV eligibility requirements to receive grants. DACA, undocumented, and international students were prohibited from receiving funds by the guidance. Online students enrolled exclusively in online programs were also ineligible. Non-degree seeking, non-credit, dual enrollment, and continuing education students were eligible pursuant to the guidance. The information published on May 11, 2021, indicates the Department's final rule states that all students enrolled during the COVID-19 national emergency are eligible for grants from the HEERF.	No eligibility requirements in the law. Non-degree seeking, non-credit, dual enrollment, and continuing education students are eligible pursuant to guidance, as are students enrolled exclusively in online programs. on May 11, 2021, the Department of Education issued guidance to clarify that all students enrolled during the national emergency are eligible, including DACA, undocumented, or international students.	No eligibility requirements in the law. Non-degree seeking, non-credit, dual enrollment, and continuing education students are eligible pursuant to guidance, as are students enrolled exclusively in online programs. on May 11, 2021, the Department of Education issued guidance to clarify that all students enrolled during the national emergency are eligible, including DACA, undocumented, or international students.
Deadline to spend funds	Institutions have on calendar year from the date of award in their HEERF Grant Award Notification (GAN) to	One year from the date the institution's supplemental grant was processed, unless an extension is received	One year from the date the institution's supplemental grant was processed, unless an extension is received
Period of qualifying costs	May be used for costs dating back to March 13, 2020	May be used for costs dating back to March 13, 2021	May be used for costs dating back to March 13, 2020
Maintenance of Effort (MOE)	None. The MOE requirements only apply to the Governor's Emergency Education Relief (GEER) Funds and the Elementary and Secondary School Emergency Relief (ESSER) Funds.	None. The MOE requirements only apply to the Governor's Emergency Education Relief (GEER) Funds and the Elementary and Secondary School Emergency Relief (ESSER) Funds.	None. The MOE requirements only apply to the Governor's Emergency Education Relief (GEER) Funds and the Elementary and Secondary School Emergency Relief (ESSER) Funds.

Sources: <https://www2.ed.gov/about/offices/list/ope/factsheetheerfii.pdf> and [https://www.nasfaa.org/uploads/documents/HEERF\\_Funds\\_Comparison\\_Chart.pdf](https://www.nasfaa.org/uploads/documents/HEERF_Funds_Comparison_Chart.pdf) and [https://www2.ed.gov/about/offices/list/ope/arpfaq.pdf?utm\\_content=](https://www2.ed.gov/about/offices/list/ope/arpfaq.pdf?utm_content=)