THE hope CENTER

BEYOND THE FOOD PANTRY:
Maximizing the Impact of Higher Education Emergency Relief Funds (HEERF I & II) for Students

Edward Conroy, Sara Goldrick-Rab, and Carrie R. Welton[1]
Updated February 14, 2021

The Consolidated Appropriations Act passed in December 2020 allocated more than $22 billion of aid to institutions of higher education and students impacted by the COVID-19 pandemic (commonly referred to as Higher Education Emergency Relief Fund or HEERF II). This infusion of funds builds upon the first round of funds provided through the CARES Act. Together, these two sets of funds direct at least $12 billion in direct emergency aid grants to students. According to an January 14, 2021 press release from the Department of Education:

> "Today's announcement awards $20.5 billion to public and non-profit colleges and universities and $681 million to proprietary schools. Public and non-profit schools can use their awards for financial aid grants to students, student support activities, and to cover a variety of institutional costs, including lost revenue, reimbursement for expenses already incurred, technology costs associated with a transition to distance education, faculty and staff trainings, and payroll. Proprietary schools must use their awards exclusively to provide financial aid grants to students."

Crucially, this latest fund allows institutions of higher education greater flexibility when compared to HEERF I. Specifically, under HEERF II the Department of Education has not issued guidance limiting the award of financial aid grants to students who are eligible for Title IV aid. This means that students need not file a FAFSA in order to establish eligibility and institutions can use a broader set of criteria to identify students with financial need.

While the total pool of funds available is greater in HEERF II (institutional allocation estimates may be found here) institutions are only required to spend the same amount on direct aid to students as they did under HEERF I (see Minimum Amount for Student Aid portion). However, we strongly encourage institutions to consider investing more in order to stem falling enrollment and retention. There remains significant need amongst students.

Funds will continue to fall short of need and tough choices will be required. Adjustments will have to be made to process the dollars efficiently and effectively. Our research on institutional responses to the pandemic indicates that, unfortunately, students waited up to 13 days to receive emergency aid under HEERF I, even though the optimal timeline is 2 days. Fortunately, institutions can use the institutional portion of HEERF II funds to improve the equitable impact of emergency aid design and delivery.

Last spring we issued recommendations for emergency grant programs that use philanthropic and/or institutional dollars; this guide offers additional guidance for distributing HEERF II dollars. We draw on our latest research on emergency aid, conducted during the pandemic, in shaping this guidance. We also draw on the wisdom of college leaders, including those who participated in our recent webinar on Scaling Emergency Aid: Russell Lowery-Hart, President of Amarillo College; Keith Curry, President of Compton College; Pyeper Wilkins Vice Chancellor of Workforce and Advancement at Dallas College, and DeRionne Pollard, President of Montgomery College.

RECOMMENDATION 1: CONSIDER THE CONTEXT

As the COVID-19 pandemic continues and vaccinations efforts ramp up, institutions will need to consider whether and how long to stretch HEERF dollars. The Biden Administration is preparing for a third tranche of stimulus; however, we do not yet know whether and how much it will include student emergency aid. Thus, while it might seem wise to simply cut checks to all students quickly, it is not likely that this approach will maximize the impact of the dollars. Nor will it necessarily enhance equity; given the pandemic's trajectory so far, it seems likely that students will be facing emergency financial challenges well into the 2021-2022 academic year. Students who apply first are not necessarily the most in need. In fact, students who apply for support earlier are often those already-advantaged by "college knowledge." We recommend an approach that focuses on substantial outreach, securing widespread and diverse applications before allocating resources. Our guide to emergency aid distribution has more suggestions on this.

In designing the approach, institutions should examine their communities' economic and health contexts along with enrollment. Dr. DeRionne Pollard, President of Montgomery College, urges college leaders to pay attention to which groups are not represented, especially students who have historically been marginalized.

> "We found that there were populations of students who we were not able to be served, one group would be black male students. We saw that while they continue to have some of the lowest academic achievement metrics at Montgomery College. We found that we did not have adequate representation of those students as it came to them, receiving resources from our emergency funding."

Rates of COVID infection and unemployment are much higher for minoritized communities, and enrollment declines are most pronounced for those students and male students in particular. Outreach efforts should target these groups if such trends apply in the relevant community.

During the HEERF I distribution, we observed much greater use of technology for outreach and recommend that universal approaches to messaging continue, with continued recognition that some groups of students may need additional outreach, as noted above. Share information about support on social media and websites, integrate it into the Learning Management System, and use direct emails and texts.

RECOMMENDATION 2: PRIORITIZE AND RATION

A universal distribution of funds may be appropriate in contexts where need is widespread and acute among students. In these circumstances a rationing mechanism be required to spread funds over time and target them to students who will most benefit from them. During our Scaling Emergency Aid webinar, Pyeper Wilkins, Vice Chancellor of Workforce and Advancement at Dallas College, explained how her institution has encountered high application volume and dealt with it, even before the pandemic.

> "We launched our emergency aid program in the fall of 2019. We had a start date planned. and about a week before that start date tornadoes came through. They destroyed homes and displaced our students and created an emergency. We had to just say, 'Okay, we're going to go ahead and launch. We have half a million dollars and we're going to award $500 increments.' We really didn't know what to expect. We were hit with so many applications within just the first 24 to 48 hours and went through our dollars overnight, almost. It seemed like so much need and so many people who we wanted to help, but just not nearly enough dollars in place at the time. So, you know, with that we raised some more money and we started spreading out the money."

Dallas College partnered with Edquity, an emergency aid company, for support. Edquity uses an evidence-based approach to rationing funds aligned with evidence like that from the *New England Journal of Medicine*: "In the face of time pressure and limited information, random selection is preferable to trying to make finer-grained prognostic judgments within a group of roughly similar patients." This approach is preferable to a "first-come, first-served" model, which exacerbates existing financial and educational inequities. Instead, prioritize and randomize when the supply of funds is inadequate to serve all similarly prioritized people.

Institutions are encouraged to prioritize funds for students with the greatest financial need while also recognizing that relying on a student's FAFSA is often an insufficient proxy for this purpose. The HEERF II funds are designed to address expenses associated with a student's ability to attend college, including—food, housing, course materials, technology, health care, and child-care expenses, or for "any emergency costs that arise due to the coronavirus." We encourage institutions to trust a student's ability to self-identify what expenses they must cover to maintain their enrollment.

Based on our research, we also recommend using an application that assesses whether the student is facing conditions or circumstances that make campus supports important and closures due to the pandemic especially problematic. Our #RealCollege surveys, along with a growing body of other research, provide insights into what could be assessed and prioritized. Consider which students are enduring food or housing insecurity, or have children, are from minoritized communities, or are LGBTQIA or system-impacted.

For example, Amarillo College and the Alamo College District use an application where students are asked to self-report their level of hardship, while Dallas College, Western Governors University, and others use a research-driven short application provided by Edquity that assesses a student's material conditions.

RECOMMENDATION 3: FOCUS ON CARE

The distribution of federal dollars is often fraught with fears about meeting standards for compliance. It is essential to prevent those fears from overcoming a focus on care. Make it clear that support, both on and off-campus, is available to students. Put information about available support in the syllabus, use short surveys and strategic emails to check in with students. Russell Lowery-Hart spoke to how an all-hands-on-deck approach at Amarillo College showed students that they were cared for while CARES was being distributed:

> "Every employee had five to ten students they were assigned to check in on every week to make sure employees understood *what* was available to them was just as important as how it was communicated to our students because they're the glue. Our employees are what glued our students to these resources."

A key factor in communicating care to students is instilling a culture of caring throughout the institution. A cohesive message of care from every part of the institution, from every staff member, sends a powerful message to students. Pyeper Wilkins reported that for Dallas College this message of care has been a key piece of institutional pandemic learning.

> "The other thing that we've really learned throughout this pandemic and in our implementation of CARES Act emergency aid is that people do care. People are beginning to understand that helping to meet the basic needs for students is part of our job. Our board, our staff, our faculty— people understand, and they want to help students. That's the biggest piece of learning for us."

This leaves institutions with several options for deciding which students to prioritize for support:

- **An independent complex application process to gather students' current financial circumstances.** This is inadvisable, as it will create administrative hassles that keep many students from the support they badly need.

- **An application asking students to check off the problems they have faced due to the pandemic.** This may be a common approach, but it is likely that some students will be unsure whether or not their problem was caused by the pandemic, and *miss out on support*.

- **An application that assesses whether the student is facing conditions or circumstances that make campus supports important and closures due to the pandemic especially problematic.** This is our preferred option. #RealCollege surveys and a wide body of research provide insights into what could be assessed and prioritized. Consider which students are enduring food or housing insecurity, or have children, are from minoritized communities, or are LGBTQIA or system-impacted. The application used by Edquity is an excellent example.

RECOMMENDATION 4: COLLABORATE AND ADVOCATE

It is encouraging to see that Congress heeded calls for a more equitable apportionment of funds among institutions. Funding allocations under HEERF I were based purely on full-time equivalents (FTE), while the allocation formula for HEERF II combined FTE and headcount since every student requires support, even if only enrolled part-time.

Many institutions will find their students' needs outstrip their funding. However, some other institutions may find that they have more than sufficient funds. Per ED's guidance, IHEs should "provide funds to other institution(s) within their state (or region) if their allocated funds exceed their students' needs." We urge four-year colleges and universities to support their transfer partners to create greater stabilization impacts for students, their regions and states.

RECOMMENDATION 5: RE-ENROLL STUDENTS

Many students have stopped attending college as a result of the pandemic. Many of those students might be in a position to re-enroll if colleges can assist them with their basic needs, or by clearing an institutional bill.[2] Students who were enrolled when the pandemic was declared as a national emergency on March 31, 2020, or who have been enrolled at any point since then, are eligible to receive grants to cover any component of their cost of attendance. Helping students re-enroll is in the best interests of students and institutions. Now is the time to reach out to those students, re-engage them, support their basic needs, and get them back into classes. Led by President Keith Curry, Compton College is considering multiple creative options for re-engaging their students and getting them re-enrolled.

RECOMMENDATION 6: EVALUATE AND ITERATE

Federal support for emergency aid is uncommon and a new practice. It is especially notable that the constraints on design and delivery associated with Title IV have not been applied to this latest HEERF. This is a critical moment to examine the efficacy of the support. Consider comparing the academic performance and outcomes of students who are funded to those who applied but were not funded (or were nearly funded). New preliminary evidence from the emergency aid program at Compton College suggests that students who receive timely emergency aid are more likely to persist and graduate at higher rates than students who do not receive emergency aid. Collecting this type of data is vital for the long-term success of emergency aid programs. Disaggregate the data to examine whether all students had equitable access to support and who appeared to benefit most. Also examine impacts on students' health and wellbeing, and that of their families. Share these findings with your teams to iterate your practice, and with government and philanthropic leaders to advocate for more support.

NOTES

[1] Financial disclosure: In addition to serving as Founding Director of The Hope Center, Dr. Goldrick-Rab also created the FAST Fund, a faculty-run emergency aid program operated by the nonprofit Believe in Students, and she is Chief Strategy Officer at Edquity, a private company also distributing emergency aid. Edquity's approach to emergency aid uses an algorithm that Dr. Goldrick-Rab developed based on her research. She is a paid consultant and holds stock in the company.

[2] Institutions need written consent from the student to use HEERF II funds to clear an outstanding account balance.

Thank you to the Conagra Brands Foundation and Aramark for supporting our work on this guide.

FOR COLLEGE,
COMMUNITY,
AND JUSTICE