



## #RealCollege Recommendations to the U.S. Department of Education Regarding the Higher Education Emergency Relief Fund

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The U.S. Department of Education faces a critical and urgent task: implementation of the recently enacted Coronavirus Aid, Relief, and Economic Security (CARES) Act, and specifically the Higher Education Emergency Relief Fund authorized therein.

Based on the Hope Center's extensive work with and on behalf of #RealCollege students facing basic needs insecurity, we offer three considerations for the implementation of the Higher Education Emergency Relief Fund. The distribution of emergency aid matters a great deal to its efficacy, and there are many common challenges with typical distribution as [outlined in our recent brief](#). Therefore, the Department of Education's guidance should:

1. Clarify that higher education institutions should not use the student emergency relief portion to reimburse the institution for expense that are not explicitly listed in CARES;
2. Ensure that higher education institutions recognize the [flaws in the Higher Education Act definition of cost of attendance](#) and adapt their emergency aid distribution accordingly to meet the real needs of students;
3. Direct higher education institutions to prioritize students with low incomes, parenting students, students of color, and undocumented students in the aid distribution.

We fully recognize that the COVID-19 pandemic is impacting higher education institutions, putting their viability at risk. Students will not succeed in college if their institutions' financial struggles limit the quality and type of support services available or compromise faculty and staff working conditions. The Hope Center therefore urges Congress to provide more resources to institutions in a fourth congressional stimulus package.

But in the meantime, higher education institutions should not be permitted to seek reimbursement for student expenses from the student emergency aid portion of CARES. This includes reimbursements for tuition, room and board fees, student activities fees, and parking fees, or other goods and services that were not delivered. However, if an institution provided emergency aid to students by re-allocating institutional dollars needed for other activities (consider the [Montgomery College example](#) in our report), they should be able to use the emergency aid portion for reimbursement. In addition, the purchase of laptops, WiFi devices or other goods or services provided directly to students should also be reimbursable.

The CARES Act indicates that students should be provided grants for a “component of their cost of attendance per section 472 of the Higher Education Act.” However, this definition of cost of attendance does not [represent the reality of costs for students](#). Housing and food costs are often understated, and it fails to account for the costs that parenting students incur, resulting in [high levels of unmet financial need](#) for students with disproportionate impacts on students of color. The Department of Education should ensure that the guidance they provide accounts for the shortcomings in the current calculations of cost of attendance. The guidance the Department issues should reflect modern day costs of living including [housing costs](#), food preparation and purchasing that exceed the Supplemental Nutrition Assistance Program’s [dated formula](#), and [child care costs](#).

The Department of Education must strike a balance between providing guidance to institutions on which students to target for emergency aid and flexibility. Higher education institutions and leaders will no doubt struggle with picking “winners and losers” when allocating emergency aid during the COVID-19 pandemic. However, it is important to maximize the impact of the dollars to increase the odds of retention and graduation. Moreover, we have extensive evidence that typical indicators such as Pell grant receipt are inadequate proxies for which students face basic needs insecurity. Other factors not given much attention in Department of Education data, including lack of parental support, presence of children in the home, difficulty finding and securing work, and the impact of criminal justice and foster care systems play key roles and must be considered by institutions doing the difficult work of [rationing emergency aid](#).

To maximize impact of the CARE’s emergency aid grants on today’s college students, the Department of Education must move quickly. We urge the Department to provide guidance on the matters above and disburse the dollars immediately.

## Notes

<sup>1</sup> 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.