

Coronavirus Response and Relief Supplemental Appropriations Act, 2021

Frequently Asked Questions

UPDATED: February 1, 2021

When will I get my Coronavirus Response and Relief Supplemental Appropriations Act (CRRSAA) funds?

Many institutions have already received their funds. Institutions must submit their CARES Act Annual Report and all their quarterly reports before new funds from CRRSAA will be obligated. CARES Act Annual Reports were due on February 1. If your institution has not submitted its reports, you can use the Higher Education Emergency Relief Fund [reporting guide](#) to do so.

How will institutions receive CRRSAA funds?

Institutions that received CARES Act funds will not need to reapply for the CRRSAA funds. Institutions will receive two supplemental award allocations, one for emergency student grants and one for institutional relief. When an institution draws down its first funds, it will constitute an automatic acceptance of the new grant conditions and uses of funds. As with the CARES Act, funds will be drawn down through the G5 system. All student funds do not have to be expended before the institutional funds. The April 15 application deadline applies to institutions that did not apply for CARES institutional funds or CARES student funds.

As happens regularly with Title IV student aid programs, institutions should be ready to use their funds quickly. Student funds must be disbursed within 15 days of draw down, and institutional funds must be disbursed within 3 days of draw down.

What's the biggest difference between CARES Act and CRRSAA funding?

The CARES Act funding was provided to cover additional expenses incurred because of the *disruption of instruction* due to coronavirus, whereas the CRRSAA funding is provided to more broadly cover expenses *while operating during a pandemic*.

How much of an institution's CRRSAA funds must go to student emergency grants?

Institutions must provide at least the same dollar amount to students in emergency grants as they were required to under the CARES Act. The required student portion is evident in the allocation table, which may also include online students (if applicable) who were provided for in CRRSAA.

What are the allowable uses for CRRSAA funds?

The institutional allocation can be spent on an expanded list of allowable uses of funds that defray expenses associated with coronavirus, such as:

- Lost revenue
- Reimbursement for expenses, technology, staff training, payroll
- Student support services, such as TRIO and GEAR UP
- Student grants for any part of the cost of attendance

Institutions should be aware that all CRRSAA funds must be accounted for separately as there are some disallowed expenses. This means funds cannot be put into the general fund, but should be tagged to specific expenses or lost revenue. For example, institutions are prohibited from using CRRSAA funds for capital projects, executive bonuses, recruitment and enrollment payments, and investment payouts, as was the case in the CARES Act.

What students are eligible for emergency student grants from the student allocation?

The law and the January 14 guidance do not define or address the definition of student. It is highly anticipated that the Biden Administration will address the definition of student for the purposes of CRRSAA funds. Students are not required to be eligible for Title IV funds to receive emergency grants under the CRRSAA.

The law requires that emergency student grants be provided to “students with exceptional need,” but does not require that student recipients be Pell Grant recipients or Pell Grant eligible. The Department of Education suggests that the maximum Pell Grant be an appropriate limit for a maximum emergency grant. Institutions should maintain records of the methodology used for determining emergency student grant distribution.

How can student grants be distributed?

CRRSAA emergency grants may be distributed to students using the same vehicles as CARES Act student funds, such as checks, electronic transfer payments, debit cards, and payment apps. The Certification and Agreement for the CRRSAA explains that institutions “hold these grant funds in trust for students and acts in the nature of a fiduciary for students.”

CRRSAA allows emergency student grants to cover any part of the cost of attendance (COA). The student must affirmatively opt-in to having their emergency grant apply to COA expenses paid to the institution, and the institution is prohibited from requiring students to first cover any COA or institutional balance. For example, an institution may provide a form asking students how they would like to receive the emergency grant with one of the options being to apply it to COA.

Can student emergency grants apply to past balances?

The law and the guidance do not address this issue, but the Biden Administration is expected to provide guidance on this question.



Do emergency student grants count as student income?

No. CRRSAA emergency student grants are not reported as income, are not taxable, and do not count against students in determining Title IV federal student aid.

How long does an institution have to spend its CRRSAA funds?

You have a year from the time you first receive your funds to use them.

What are the reporting requirements for CRRSAA funds?

Institutions must report on receipt and use of supplemental funds six months after the receipt of those funds. The Biden Administration will provide additional guidance on future reporting.

Can an institution with unspent CARES Act funds still use those funds?

Yes, and they can now be spent according to the new uses of funds prescribed under the CRRSAA, starting with expenses incurred on or after December 27, 2020.

How does my institution apply for funds under CRRSAA if it did not receive funds under the CARES Act?

Institutions that did not receive CARES Act funds must apply for CRRSAA funds with a new grant number and original Certification and Agreement form on www.grants.gov using the grant number ED-GRANTS-041020-003 for the student portion and ED-GRANTS-042120-004 for the institutional portion. The application deadline is April 15, 2021.

If an institution does not apply for funds by April 15, the Department of Education will assume the institution does not want the funds, and will reallocate them.

Please note that CARES Act funds that were not obligated prior to passage of CRRSAA are no longer available. The CRRSAA legislation prohibits further obligation of CARES Act funds. The Department announced the clarification on January 6, 2021.

How does my institution receive all the CRRSAA funds if it only received student funds under the CARES Act?

Institutions that only received student funds under the CARES Act will automatically receive their student funds under the CRRSAA. To receive institutional funds under the CRRSAA, these institutions will need to separately apply for CRRSAA institutional funds with a new Certification and Agreement application form on www.grants.gov using the grant number ED-GRANTS-042120-004 for the institutional portion. This must be done by April 15.



Are institutions that paid the endowment tax eligible for CRRSAA grants?

If an institution paid the endowment tax in 2019 it is eligible for 50% of its allocated amount. These institutions will have a separate application process. If your institution paid the endowment tax in 2019, the allocated funds can only be used for students or “sanitation, personal protective equipment, other expenses associated with the general health and safety of the campus environment related to the qualifying emergency” (coronavirus pandemic). This specific eligibility criteria does not apply to work colleges.

Has the Department of Education announced how it will allocate the resources available for HBCUs and MSIs and in the FIPSE fund?

Not yet.