

- Period of performance backs up to March 13, 2020 through the date on your GAN. You can ask for a no cost extension on your GAN if you don't have enough time.
- Must draw at least \$1 within 90 days of date on GAN (date signed)
- Reporting for FY2021 Quarter 1 HEERF II is extended until June 30th because the DOE never published instructions. Starting with Quarter 2, all funds are combined in the report, but the reports remain for the quarter only.
- Federal cash rules still apply but we continue to have 15 days on the student portion (3 on institutional, MSI)
- For the student portion, HEERF I and II funds remaining can be used under the new rules. There is no guidance for Institutional or MSI, but those two have become more restrictive anyhow.
- Most of the rules and allowable/unallowable uses are the same as HEERF II funds
- F&A is still allowable on Institutional portion only
- Institutional Portion changes are:
 - Discharging student debt out of the Institutional Portion as lost revenue is listed as allowable (no direct award to student)
 - Student reengagement is allowable – no marketing or recruitment, but reaching out to students that would be at risk of not completing their degree due to COVID is; suggestions include academic or mental health support systems.
 - HEERF II allowed payroll associated with coronavirus but only allowed new benefits costs. HEERF III addressed payroll – must be for new staff or repurposed staff where work is associated with COVID. Suggested allowable items are: medical personnel, contact tracers, TA's to allow smaller class sizes, IT staff, or overtime so long as associated with COVID. I do not see any indication that HEERF II has been put under these rules.
 - Two new required spending categories for Institutional Portion (this appears to apply to MSI as well) unless 100% of the funds are spent on student grants in aid
 - Categories are: 1) to implement evidence based practices to monitor and suppress coronavirus; and 2) direct outreach to financial aid applicants
 - The guidance on how much to allocate is unclear and references portion of the Cost Principles that do not make very much sense. The statute does not require a specific amount or portion. However, the Department of Education has stated that universities must spend a reasonable and necessary portion of the grants to successfully implement these activities. Further, we will have to document the following:
 - Strategies used to monitor and suppress COVID
 - Evidence to support the strategies
 - How strategies were in accordance with public health guidance
 - Manner and extent of direct outreach to students
 - How the amount of the HEERF grant spent is reasonable and necessary given the needs and circumstances of the institution
 - I've asked the UH Division of Research for assistance in understanding how the referenced portions of the Cost Principles apply to their requirements, but it is most likely a moot point.
 - I've sent a question to the NACUBO CFO listserv asking if any other campuses have arrived at a method of setting the allocation.
 - We're leaning towards 10 – 15%; we may wind up using things that we were going to submit to FEMA to meet that goal

