



MILES COLLEGE

HIGHER EDUCATION EMERGENCY RELIEF FUND (HEERF III) STUDENT EMERGENCY AID FREQUENTLY ASKED QUESTIONS (FAQs)

In response to the ongoing COVID-19 global pandemic, the 2021 American Rescue Plan (ARP) has provided an additional emergency financial aid grant for students called the Higher Education Emergency Relief Fund (HEERF III). This grant may be used to assist students who have emergency financial needs related to educational costs, basic needs such as food, housing, utilities, healthcare, childcare, other needs that may be related to the student who also is a parent (student-parent), and/or transportation challenges.

A FAFSA IS NOT REQUIRED

The Free Application for Federal Student Aid (FAFSA) is no longer required to submit your request through the Emergency Relief Form (the Student Aid Application) for HEERF-III funds which is available on the website, or at this link [\(linked application goes here\)](#)

DIRECT DISTRIBUTION TO STUDENTS

Miles will pay approved HEERF-III student emergency grants directly to eligible students. Students with outstanding balances may authorize Miles to apply, all or a portion, of the HEERF III Student Aid grant to their student account. This can be done seamlessly by checking the appropriate box, signing the Student Aid Application and submitting it electronically.

U.S. CITIZENSHIP IS NOT REQUIRED

All students (U.S. citizens and non-citizens) who are enrolled for the Fall 2021 semester are eligible to request funds.

PRIORITY FUNDING

Priority funding will be given to students who are Pell grant eligible and those with exceptional need as indicated on the Emergency Relief Form (the Student Aid Application). Amounts may vary based on need and the availability of funds. The College will continue to offer HEERF-III grants until all student aid funds have been exhausted.

HEERF III AMERICAN RESCUE PLAN 2021

Frequently Asked Questions

Emergency Financial Aid Grant to Students

QUESTION: Which students are eligible to receive emergency financial aid grants?

ANSWER: As announced in the Department’s final rule, “Eligibility to Receive Emergency Financial Aid Grants to Students Under HEERF” (May 14, 2021, 86 FR 26608) (final rule), the term “student,” is now defined as any individual who is or was enrolled (as defined in 34 CFR § 668.2) at an eligible institution (as defined in 34 CFR § 600.2) on or after March 13, 2020, the date of declaration of the national emergency due to the coronavirus (85 FR 15337). Thus, students are no longer required to be eligible for Title IV student financial aid in order to receive financial assistance under the HEERF III Program.

Put more plainly, students who are or were enrolled in an institution of higher education during the COVID-19 national emergency are eligible for emergency financial aid grants; regardless of whether they completed a Free Application for Federal Student Aid (FAFSA) or are eligible for Title IV. However, institutions are directed to prioritize students with exceptional need, such as those who receive Pell Grants or are undergraduates with extraordinary financial circumstances.

Beyond Pell eligibility, other types of exceptional need could include students who may be eligible for other federal or state need-based aid or have faced significant unexpected expenses, such as the loss of employment (either for themselves or their families), reduced income, food or housing insecurity and/or unexpected increases in utilities, or transportation challenges. In addition, ARP explicitly state that emergency financial aid grants to students may be provided to students enrolled in online degree programs provided the institution prioritizes and documents what it has defined as exceptional need.

QUESTION: May undocumented students and international students receive financial assistance?

ANSWER: Yes. The Department’s final rule on student eligibility for HEERF states that all students who are or were enrolled in an institution of higher education during the COVID-19 national emergency are eligible for emergency financial aid grants. This includes citizens, permanent residents, refugees, asylum seekers, Deferred Action for Childhood Arrival (DACA) recipients, other DREAMers, and similar undocumented students.

International students may also receive HEERF Emergency Financial Aid grants as long as they have demonstrated exceptional need. This includes citizens, permanent residents, refugees, asylum seekers, DACA recipients, other DREAMers, and similar undocumented students.

QUESTION: Can students who are studying abroad receive HEERF emergency financial aid grants?

ANSWER: Yes. Students who are studying abroad may receive HEERF emergency financial aid grants from the recipient institution where they are enrolled. These students must meet the criteria based on exceptional need that the institution has established for distributing emergency financial aid grants.

QUESTION: What civil rights requirements must institutions comply with when distributing emergency financial aid grants to students under the HEERF programs?

ANSWER: Institutions of Higher Education must not distribute student emergency financial aid grants in a manner that discriminates against individuals on the basis of race, color, national origin, disability, or sex. See, e.g., 42 U.S.C. § 2000d et seq., (Title VI), 29 U.S.C. § 701 et seq. (Rehabilitation Act), 20 U.S.C. § 1681 (Title IX).

QUESTION: What are the requirements for making emergency financial aid grants to students?

ANSWER: Students who are or were enrolled in an institution of higher education on or after the date of the declaration of the national emergency due to the coronavirus (March 13, 2020) are eligible for emergency financial aid grants from the HEERF III, regardless of whether they completed a FAFSA or are eligible for Title IV. The HEERF III or ARP guidelines require that institutions prioritize students with exceptional need in awarding emergency financial aid grants to students. This includes students who receive Pell Grants or are undergraduates with extraordinary financial circumstances.

Beyond Pell eligibility, other types of exceptional need could include students who may be eligible for other federal or state need-based aid or have faced significant unexpected expenses either for themselves or that would affect their financial circumstances, such as the loss of employment, reduced income, or food or housing insecurity. In addition, the regulations state that emergency financial aid grants to students also may be provided to students exclusively enrolled in distance education. In addition, all students—including citizens, permanent residents, refugees, asylum seekers, DACA recipients, other DREAMers, and similar undocumented students—are eligible to receive assistance as long as they complete the “Student Aid Application” and have basic unmet needs.

Institutions may not: (1) condition the receipt of emergency financial aid grants to students on continued or future enrollment in the institution, (2) use the emergency financial aid grants to satisfy a student’s outstanding account balance unless it has obtained the student’s written (or electronic), affirmative consent, or (3) require such consent as a condition of receipt of or eligibility for the emergency financial aid grant. Institutions must document how it prioritizes students with exceptional need in distributing emergency financial aid grants to students. All institutions are required to report its process for determining students’ needs, as well as, report information on how much student aid it is distributing each quarter.

QUESTION: When might the Department determine that an institution has failed to prioritize emergency financial aid grants to students with exceptional need?

ANSWER: The Department will make an individualized determination about whether an institution failed to prioritize emergency financial aid grants to students with exceptional need. The Department may determine an institution has failed to do so if the institution established preconditions for students to receive emergency financial aid grants; such as: (1) establishing a minimum GPA, (2) imposing other academic or athletic performance or good standing requirements, (3) requiring continued enrollment in the institution or (4) required the student to first pay any outstanding debt or balance) that results in failure to prioritize students with exceptional need.

QUESTION: How may students use their emergency financial aid grants?

ANSWER: Emergency financial aid grants may be used by students for any component of their cost of attendance or for emergency costs that arise due to coronavirus, such as tuition, food, housing, health care (including mental health care) or child care. Students determine how they may use their emergency financial aid based on the information provided on the Student Aid Application and/or if they would like to clear any balances they owe the institution.

QUESTION: Can an institution direct or control how a student may use student aid grant funds?

ANSWER: No. The student emergency financial aid grant is provided to the student, and may be used by the student for any component of the student's cost of attendance or for emergency costs that arise due to coronavirus, such as tuition, food, housing, utilities, monthly Internet costs (for commuter students and/or student-parents) health care (including mental health care), or child care.

The College may not compel a student to use a portion of their grants to satisfy any existing debts or balance.

QUESTION: Are emergency financial aid grants to students treated as taxable income?

ANSWER: No. Emergency financial aid grants made by a federal agency, State, Indian tribe, higher education institution or scholarship-granting organization (including a tribal organization) to a student because of an event related to the COVID-19 national emergency are not included in the student's gross income.

QUESTION: Should an institution include receipt of a HEERF emergency financial aid grant when calculating a student's Expected Family Contribution (EFC)?

ANSWER: As stated in the Department's April 3, 2020 Electronic Announcement, "[a]ny aid (in the form of grants or low-interest loans) received by victims of an emergency from a federal or state entity for the purpose of providing financial relief is not counted as income for calculating a family's Expected Family Contribution (EFC). As such, any HEERF emergency financial aid grant received by a student under the CARES Act (HEERF I), CRRSAA (HEERF II), or ARP (HEERF III) should not be counted as income when calculating a student's expected family contribution.

QUESTION: What steps can my institution take if a student does not cash a check issued to him/her as an emergency financial aid grant?

ANSWER: If a student does not cash their emergency financial aid grant check by a reasonable date, the institution may choose to void the check and redistribute the funds to other students. Institutions should make every effort to contact a student prior to voiding a check for an emergency financial aid grant and should document the procedures, policies, and general student contact efforts made and followed as part of their administration of their HEERF Student Aid Grants.

QUESTION: Can an institution use HEERF grant funds for students to recover stop-payment fees incurred due to voided and re-issued student financial aid checks that were lost or never received by the student?

ANSWER: No. Stop-payment fees on checks that were lost or never received by the student are administrative costs associated with administering the Student Aid Portion award. Such administrative costs are not allowable expenses under the “Student Aid Portion” since all those funds must be distributed directly to students as emergency financial aid grants, or with the students’ approval, a portion, or all of the grant can be used to reduce his/her student account balances. However, stop payment fees may be an allowable expenditure under the HEERF (a)(1) Institutional Portion grant provided the fees are reasonable and well-documented.