**ICYMI: New CARES Act HEERF Reporting Requirements Announced**

Hi Everyone,

The Audit and Accounting Principles Committee wanted to share with you a recent announcement from the Department of Education (ED). Effective September 28, 2020, it has implemented new **quarterly** reporting deadlines related to the use of funds received from the Higher Education Emergency Relief Fund (HEERF).

*Key Take-Aways:*

* Reporting deadlines pertains to funds received under Section 18004(a)(1)—for institutional portion—and Sections 18004(a)(2) and 18004(a)(3).
* First quarterly report is due **October 30, 2020** for the period between the date of the first HEERF award and September 30, 2020.
* Subsequent reports are then due quarterly and must be posted no later than 10 days after the calendar quarter (January 10, April 10, July 10, October 10)
* This quarterly reporting requirement does not eliminate the annual reporting requirement

*More Details:*

* The Department of Education is hosting a webinar on these new requirements on **October 14, 2020** from **2:00-3:00 pm ET**. See [here](https://www2.ed.gov/about/offices/list/ope/heerfreporting.html) for details on the ED website.

*In Review:*

Under the $2.2T Coronavirus Aid, Relief, and Economic Security (CARES) Act, $14B was allocated to the U.S. Department of Education for postsecondary school assistance.

The following CARES Act sections pertain to HEERF:

18004(a)(1):

* All Title IV participating schools
* Student emergency relief
  + minimum 50% of funds received by institution must go to students
* Institutional emergency relief
  + new reporting requirement pertain to institutional portion only

18004(a)(2):

* Historically Black Colleges and Universities (HBCUs)
* Tribally Controlled Colleges and Universities (TCCUs)
* Minority Serving Institutions (MSIs)
* Strengthening Institutions Program (SIP)

18004(a)(3):

* Fund for the Improvement of Postsecondary Education
* Institutional Resilience and Expanded Postsecondary Opportunity Competitive Grant
* For institutions that “have the greatest unmet needs related to coronavirus”
* For any component of the student’s cost of attendance (e.g., food, housing, course materials)

Sections 18004(a)(2) and 18004(a)(3) allow the recipient institutions to “defray institutional expenses, which may include lost revenue, reimbursement for expenses already incurred, technology costs associated with the transition to distance education, faculty and staff training, and payroll.”

Institutions should be prepared to report and demonstrate the use of funds received was in accordance with Section 18004(c) to “cover any costs associated with significant changes to the delivery of instruction due to the coronavirus, so long as such costs do not include payment to contractors for the provision of pre-enrollment recruitment activities; endowments; or capital outlays associated with facilities related to athletics, sectarian instruction, or religious worship.”

*References:*

1. [Full NACUBO release](https://www.nacubo.org/News/2020/10/ED-Announces-and-Implements-New-HEERF-Quarterly-Reporting-Requirements).
2. [CARES Act](https://www.congress.gov/116/plaws/publ136/PLAW-116publ136.pdf)
3. [Department of Education Office of Postsecondary Education](https://www2.ed.gov/about/offices/list/ope/index.html)
4. [HEERF Reporting Requirements Table (ED)](https://www2.ed.gov/about/offices/list/ope/heerfreporting.html).
5. [HEERF 10/2/20 FAQs (ED)](https://www2.ed.gov/about/offices/list/ope/round3heerffaqs1022020.pdf)