



PURPOSE & OVERVIEW

The *Higher Education Emergency Relief Fund III (HEERF III)* is authorized by the *American Rescue Plan Act (ARPA) of 2021* and included additional COVID-19 relief for institutions of higher education. This COVID stimulus bill included \$40 billion, available through September 30, 2023, for higher education institutions and students, using the same *Higher Education Emergency Relief Fund (HEERF)* model established in the *Coronavirus Aid, Relief and Economic Security (CARES) Act of 2020*.

All previous unexpended *CARES (HEERF I)* and *Coronavirus Response and Relief Supplemental Appropriations (CRRSAA) Act funds (HEERF II)*, both student share and institutional share, may be used in the same way they are permitted to be used under the *ARPA/HEERF III* rules. All awards made under *ARPA/HEERF III* rules, including previously unencumbered *CARES (HEERF I)* and *CRRSAA (HEERF II) Act funds*, shall henceforth be labeled *ARPA/HEERF III*. The College reserves the right to award all *ARPA (HEERF III)* and previously unencumbered *CARES (HEERF I)* and *CRRSAA (HEERF II)* funds (labeled as *ARPA/HEERF III*), during the fall 2021 academic semester as it deems necessary. The College shall continue to make awards to eligible students, in accordance with this Policy & Procedure, until all available unencumbered *ARPA/HEERF III* funds are depleted, there are no more eligible students to award, the funds expire, or this Policy & Procedure is retired and replaced by a College Policy & Procedure that supersedes it, whichever comes first.

HOW THE POPULATION OF ELIGIBLE STUDENTS IS DETERMINED

ARPA/HEERF III grants may be used for any component of the student's cost of attendance (COA) or for emergency costs that arise due to coronavirus, such as tuition, food, housing, health care (including mental health care), or childcare. The College has determined it shall issue *ARPA/HEERF III* grants to eligible students based on components within in the COA through a block-grant process and not emergency expenses.

The College is permitted to include students enrolled exclusively in online classes along with international students, refugees, asylum seekers, DACA recipients, other DREAMers, and similar undocumented students in its classifications of students eligible to receive *ARPA/HEERF III* awards, along with students enrolled in non-credit courses. However, the College must prioritize eligible domestic students over international students when issuing *ARPA/HEERF III* awards.

Additionally, *ARPA/HEERF III* requires that the College prioritize students with *exceptional need*, such as students who receive Pell Grants, in awarding these grants to students. Students determined not to have *exceptional need* shall be considered to have *regular need*. Finally, the College is permitted to define *exceptional need* in methods other than Pell grant eligibility. Therefore, the College has determined that an anticipated one-year program cost (limited to tuition & college fees) threshold shall be the determination between *exceptional need* and *regular need* within the domestic, non-credit student population.

General Circumstances Included/Excluded in Eligibility & Award Determinations:

- **Included:**
 - Classifications of student enrollment (for-credit, non-credit)
 - Classifications of student residency (for-credit domestic, non-credit domestic, for-credit international)
 - Cost of Attendance components as basis for award (applicable to for-credit domestic, for-credit international)
 - Enrollment status (applicable to for-credit domestic, for-credit international)
 - Expected Family Contribution (EFC) as the determination of *exceptional need* (applicable to for-credit domestic)
 - Anticipated one-year program tuition & course cost threshold (in lieu of EFC as the determination of *exceptional need*, applicable to non-credit domestic)
 - Non-credit academic program enrollment (limited to non-credit programs eligible for *Wyoming Works Student Grants*, applicable to non-credit domestic)

- **Excluded:**
 - Emergency grant determinations (applicable to for-credit domestic, non-credit domestic, for-credit international)
 - Federal Student Aid eligibility (applicable to for-credit domestic, non-credit domestic, for-credit international)
 - For-credit academic program enrollment (applicable to for-credit domestic, for-credit international)



Eligible Student Populations:

1. Domestic students in for-credit courses:

- **Need Calculation** – *Exceptional Need* prioritization is defined as Pell eligible as determined by EFC vs not Pell eligible as determined by EFC at the time of award disbursement.
- **Award Calculation** – Pell eligible students at the time of ARPA/HEERF III awarding (determined by a 2021-22 EFC that corresponds to Pell grant eligibility) shall receive a “A” dollar award bracket, prorated by enrollment status at the time of disbursement. Non-Pell eligible students (either through an EFC is that is above Pell grant threshold or because they did not have a 2021-22 Free Application for Federal Student Aid/FAFSA on file with the College at the time of award disbursement) shall receive a “B” dollar award bracket, prorated by enrollment status at the time of disbursement.
- **Prioritization Requirement** – Issuing a larger grant amount to Pell-eligible students shall meet the ARPA/HEERF III requirement to prioritize students with *exceptional need*.

2. International students in for-credit courses:

- **Need Calculation** – No for-credit international students shall be considered to have *exceptional need*, as confirmation of sufficient financial resources is a condition of student visa and NWC international student enrollment.
- **Award Calculation** – For-credit international students shall receive a “C” dollar award, prorated by enrollment status at the time of disbursement.
- **Prioritization Requirements** – Issuing a smaller grant amount to for-credit international students than for-credit domestic students shall meet the ARPA/HEERF III requirements to prioritize:
 - domestic students over international students
 - students with *exceptional need*

3. Domestic students in non-credit courses:

- **Non-credit Program Inclusion** – Only domestic non-credit students enrolled in programs currently approved as *Wyoming Works Student Grants* programs shall be eligible for ARPA/HEERF III awards, as these programs provide a recognized credential in demand within the Wyoming workforce and include tuition & fees that far exceed the nominal costs associated with personal enrichment non-credit courses. All domestic, non-credit students must be recorded in *Ellucian Colleague* and be enrolled in a *Wyoming Works Student Grant*-approved program & applicable non-credit course recorded in *Ellucian Colleague* at the time of disbursement in order to permit documentation of award, disbursement, and issuance of ARPA/HEERF III funds. Non-credit students enrolled in *Wyoming Works Student Grant*-approved programs who are not recorded in *Ellucian Colleague* at the time of award disbursement forfeit inclusion and are excluded from ARPA/HEERF III award consideration.
- **Need Calculation** – Determination of *exceptional need* for domestic, non-credit students enrolled in *Wyoming Works Student Grant*-approved programs is through an anticipated one-year non-credit program cost (billed tuition & course materials only) delineation.
- **Award Calculation** – Students enrolled in *Wyoming Works Student Grant*-approved non-credit programs (see previous bullet) that have an anticipated one-year program cost more than, or equal to, \$1,000 shall receive a “D” amount bracket. Students enrolled in non-credit programs that have an anticipated one-year program cost less than \$1,000 shall receive an “E” amount bracket.
- **Prioritization Requirements** – Issuing a larger grant amount to non-credit students with an anticipated annual program cost of \$1,000 or more shall meet the ARPA/HEERF III requirement to prioritize students with *exceptional need*.

Ineligible Student Populations:

1. Students enrolled in courses identified as offered through concurrent/dual enrollment Memoranda of Understanding (MOUs).
2. Non-credit students not enrolled in *Wyoming Works Student Grant*-approved programs.



Policy & Procedure – ORIGINAL

HOW ELIGIBILITY DETERMINATIONS ARE MADE

To be eligible for grant consideration, a student must:

- Be enrolled in for-credit courses not identified as offered through concurrent/dual Memoranda of Understanding (MOUs) at the time of award disbursement; or
- Be enrolled in non-credit program & course that is currently approved for *Wyoming Works Student Grants* and be recorded in *Ellucian Colleague* at the time of award disbursement-

HOW GRANTS ARE AWARDED

Students confirmed to meet eligibility requirements for *ARPA/HEERF III* grant funding shall be awarded:

1. A predetermined, standardized grant amount based on a 2021-22, 9-month EFC Pell eligibility bracket, commensurate to all other awardees who have that same EFC/Pell eligibility bracket and enrollment status proration; or,
2. A predetermined, standardized grant amount based on international student status, commensurate to all other awardees who are classified as international students and have that same enrollment status proration; or,
3. A predetermined, standardized grant amount based on the non-credit anticipated one-year *Wyoming Works Student Grant*-approved program cost bracket, commensurate with all other awardees enrolled in the same non-credit *Wyoming Works Student Grant*-approved program & course who are recorded in *Colleague*. A student enrolled in a non-credit *Wyoming Works Student Grant* program who is also enrolled in for-credit courses may receive a grant based on the non-credit *Wyoming Works Student Grant* program and a grant based on the for-credit course enrollment, as the College recognizes the are separate costs associated with non-credit & for-credit enrollment.

Predetermined, standardized grant amounts by EFC/Pell eligibility bracket, prorated by enrollment status, or non-credit program anticipated cost award chart:

For-Credit, Domestic Students	FT \$	QTR \$	HT \$	<HT \$
Exceptional Need (EFC of 5,856 or less): "A" Award*	"A" Amount	75.0% of "A"	50.0% of "A"	"25.0% of "A"
Regular Need (EFC of more than 5,856): "B" Award*	"B" Amount	75.0% of "B"	50.0% of "B"	"25.0% of "B"

For-Credit, International Students	FT \$	QTR \$	HT \$	<HT \$
Regular Need: "C" Award*	"C" Amount	75.0% of "C"	50.0% of "C"	"25.0% of "C"

Non-Credit, Domestic Students	Anticipated One-Year Cost Delineation
Exceptional Need (Anticipated One-Year Non-Credit Program Cost \$1,000 or more): "D" Award*	"D" Amount
Regular Need (Anticipated Non-Credit Program Cost Less than \$1,000): "E" Award*	"E" Amount

*The College reserves the right to modify grant award amounts at its discretion, at any time, without notice.

HOW GRANTS ARE DISBURSED TO GRANT RECIPEINTS

Awardees receive grants through the following process:

1. The Financial Aid Office shall enter an awarded the appropriate *ARPA/HEERF III* grant into the student's AIDE data fields within the *Ellucian Colleague* student database, using unique award coding to identify:
 - a. Domestic students –
 - i. Award Code "**ARDEN**" – Unencumbered *CRRSAA/HEERF II* & *ARPA/HEERF III* grants awarded & disbursed under applicable *ARPA/HEERF III* policy & procedure. Denotes American Rescue Domestic Exceptional Need.
 - ii. Award Code "**ARDRN**" – Unencumbered *CRRSAA/HEERF II* & *ARPA/HEERF III* grants awarded & disbursed under applicable *ARPA/HEERF III* policy & procedure. Denotes American Rescue Domestic Regular Need.
 - b. International students –
 - i. Award Code "**ARIRN**" – Unencumbered *CRRSAA/HEERF II* & *ARPA/HEERF III* grants awarded & disbursed under applicable *ARPA/HEERF III* policy & procedure. Denotes American Rescue International Regular Need.
 - c. Non-Credit students –
 - i. Award Code "**ARNEN**" – Unencumbered *CRRSAA/HEERF II* & *ARPA/HEERF III* grants awarded & disbursed under applicable *ARPA/HEERF III* policy & procedure. Denotes American Rescue Non-Credit Exceptional Need.
 - ii. Award Code "**ARNRN**" – Unencumbered *CRRSAA/HEERF II* & *ARPA/HEERF III* grants awarded & disbursed under applicable *ARPA/HEERF III* policy & procedure. Denotes American Rescue Non-Credit Regular Need.



2. The Business Office shall monitor *ARPA/HEERF III* Award Code transmissions to generate an ad-hoc paper check that is mailed to the preferred address that the student recorded in *Ellucian Colleague* records, or an electronic fund transfer (EFT) to the student's bank account on file (if authorized by the student). No *ARPA/HEERF III* shall be applied towards a student's account balance without obtaining a student's express written consent.

Once the Financial Aid Office disburses a grant to the student's account, the amount shall not be changed unless the institution determines a calculation error was made at the time of disbursement. The College maintains its system of checks & balances, and adheres to all Title IV cash management rules, by keeping student eligibility review & awarding separated from disbursement to the student under its Title IV administrative capability best practices.

TRACKING & REPORTING

All *ARPA/HEERF III* eligibility determinations are housed within a digital repository on the College secure network. Extraction of data is used to meet all reporting requirements as specified, in conjunction with an FCAR of disbursed awards (summary of *ARPA/HEERF* Award Codes with the *Ellucian Colleague* student database) and other College reports.

The Financial Aid Office is responsible to track/report:

- awarded students
- justification(s) for a student's award
- how the student's award amount was determined

The Business Office is responsible to track/report:

- dates of student award disbursement
- confirmation of award receipt to the student (documentation of cashed paper check or receipt of EFT)
- documentation of award applied toward student balance with student written permission

SEPARATE & SUPPLEMENTAL ARPA/HEERF III POLICIES & PROCEDURES

The College reserves the right to implement and execute supplemental Policies & Procedures for *ARPA/HEERF III* student grants, that are separate from this Policy & Procedure, for any and all *ARPA/HEERF III* student grants rescinded after student grant disbursements are made under this Policy & Procedure due to clerical error, undeliverable/unclaimed student grant refund checks, and other similar circumstances. Separate and supplemental Policies & Procedures may include student populations, priority assessments, need valuations, eligibility determinations, and/or student grant award amounts that are different from those contained in this Policy & Procedure.