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STRENGTHENING EMERGENCY AID PROGRAMS

Lessons from the CARES Act and the Higher Education Emergency Relief Fund

Unexpected financial emergencies can disrupt a student's postsecondary experience. Many colleges and universities have implemented emergency aid programs to provide students with immediate, flexible, financial support to help them stay in school. Historically, however, these have been institution-level programs. Through the federal Coronavirus Aid, Relief, and Economic Security (CARES) Act of March 2020, Congress created the first-ever federal emergency aid program for higher education, the Higher Education Emergency Relief Fund (HEERF). The legislation allocated more than $6 billion to colleges and universities to disburse directly to students to help them cover "expenses related to the disruption of campus operations due to coronavirus."[1] However, it provided few details as to who could receive funds or how colleges should implement emergency aid programs. Lessons learned from the rollout of this program can provide insights and best practices for policymakers and practitioners interested in developing future emergency aid programs at the federal, state, or institutional levels. These lessons may be useful during a time of national crisis as well as in more stable times.

In the 2020–21 academic year, MDRC partnered with the National Association of Student Financial Aid Administrators (NASFAA) and NASPA–Student Affairs Administrators in Higher Education to conduct research on the HEERF rollout. The research team surveyed more than 450 college administrators involved in their institutions' emergency aid programs, held two forums with smaller groups of administrators, and conducted four focus groups with college students attending several public and private four-year schools. The team's research shows that despite the significant burden that launching the HEERF program placed on financial aid offices, administrators and students said that the CARES Act funding was helpful in a time of great need. "These funds were critical to the health of our community, and for the well-being … and financial stability of our institution," one administrator said. Nevertheless, the research team's findings point to several areas where there is room for improvement to help get funds into the hands of students in need quickly and equitably. These include greater clarity and flexibility in the federal legislation, more effective communication with students by institutions, and a greater focus on equity. The following three issues and recommendations are excerpted from the full report on this study and may be helpful in the future for policymakers drafting federal legislation or policies for postsecondary emergency aid.[2]

LEGISLATIVE GUIDANCE AND FLEXIBLE USES OF FUNDING

One challenge colleges faced as they tried to disburse CARES funds quickly to their students was a lack of clear guidance on what was allowable under the legislation. Beyond

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designating that the funding be used to support students with expenses brought on by pandemic-related campus disruptions, the language of the CARES Act did not specify to whom colleges could make awards, how to distribute the funds among students, and how to determine the size of awards, leaving much open to interpretation. The U.S. Department of Education (ED) did not begin releasing official guidance on how to interpret the legislation until a month after it was passed, with additional guidance released incrementally through October of 2020.

The lack of clarity created a challenging situation for many colleges in the early months of the COVID-19 crisis. Administrators, who wanted to act quickly to get money into the hands of students with immediate needs, were worried about how to stay in compliance with the vague law. Said one administrator: "We appreciate that there wasn't a ton of rules … and we were grateful that we had flexibility. But as a financial aid professional, that really puts your head in a spin.… Giving us a lot of money and just saying 'You guys handle it' was kind of scary!" Many of the colleges that awarded funds to their students prior to the release of ED eligibility guidance found that it contradicted their own understanding of the law and implementation of the program. For example, ED's initial interpretation of the CARES Act narrowed the eligible population of aid recipients from all students affected by campus disruptions to only those who qualified for other forms of federal aid under Title IV of the Higher Education Act. As a result, roughly 45 percent of administrators surveyed by MDRC said they needed to make changes to the process for awarding funds during the spring and summer semesters.

Despite the restriction on eligibility to those students who met the Title IV eligibility requirements, most college administrators felt that the CARES Act legislation and subsequent guidance from ED gave colleges considerable discretion in how to define eligibility and distribute funds to their students. This was greatly appreciated, given that students faced a variety of financial needs in the face of the COVID-19 crisis. "I believe we were able to help more students by not having too many [guidelines] or too many rules," one administrator said. "The fact that it was broad enough was helpful in helping as many students as possible." Even so, several administrators in the forums expressed a desire for even greater flexibility on eligibility and allowable use of funds. For example, some said their institutions were interested in supporting undocumented students who, while not excluded initially under the CARES legislation, were, until recently, excluded under subsequent ED guidelines. Some schools tapped other funding sources to support these students, but administrators noted that many colleges likely did not have the resources to do this. Similarly, some administrators wished that the allowable uses of funds covered emergency expenses brought on by the pandemic beyond those specifically related to campus disruptions. For example, a few administrators from open- and broad-access institutions wanted to use CARES Act funds to support incoming students who were

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facing pandemic-related financial hardships and who might otherwise be prevented from enrolling. But because these students were not enrolled in college in spring 2020, any financial need would be considered unrelated to the disruption of campus operations and thus outside the allowable uses of funds. Said one administrator: "Our biggest concern is a lot of students didn't feel like they could actually afford to go to college as a result [of the pandemic]…. We could help so many more students get into school if we could use [these funds] more readily to help them cover tuition and fees."

Recommendation: Make congressional intent clear while keeping uses of funds broad.

In order to move quickly to address students' immediate needs, colleges cannot afford to wait long for clear guidance on how to implement an emergency aid program. In the future, when creating emergency aid programs during times of crisis, NASFAA suggests that lawmakers be clearer about their intent in the original language of the legislation, to reduce the need for interpretation and guidance later on and to speed up the process of getting funding out to students. College administrators also say that it should be made clear when legislation gives colleges discretion over elements of a program, so that administrators can move forward with planning for and disbursing funds without fear of being out of compliance.

In addition, NASFAA suggests that colleges should be given greater flexibility to use funds in ways that best serve their students and their institutions. By nature, emergency aid programs are designed to help with a range of unexpected financial emergencies. Even when students and colleges are facing a common crisis, the impact of that crisis will manifest in different ways. College administrators are uniquely positioned to assess their students' and their institutions' needs.

COMMUNICATING WITH STUDENTS ABOUT THE AVAILABILITY OF AID

Based on the research team's conversations with college administrators, it is apparent that colleges worked hard to communicate information about emergency aid clearly. Many administrators said that they reached out to students more than once via email, and took other steps such as posting information on their college websites. Nevertheless, colleges may not have been getting their message across to all of their students, and many students in need of funding may have missed out on the opportunity to receive aid as a consequence.

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The students who participated in the MDRC focus groups expressed a great deal of uncertainty about what aid was available, who was eligible for it, and how to request it. One student believed that her school did not offer any emergency aid, while one of her classmates recalled that the college announced the availability of aid to the full student body and encouraged everyone to apply. Several students described not applying for additional funds because they didn’t think they met a narrow set of eligibility criteria advertised by their school, or because they weren’t sure if they were eligible because they hadn’t received clear guidance from the college. “I just assumed that I probably wouldn’t get [the emergency aid], so I didn’t want to waste my time applying for it,” one student said. “I think if maybe [the college] had been more clear with saying what qualifies you for it then I could have applied and maybe gotten some money.” Many students who were already receiving aid were unaware of opportunities to request additional funding. For example, a student at one college that uses block grants to award some of its funding received additional aid from the CARES Act by asking her financial aid counselor; a fellow student was unaware that she could have done the same.

To be sure, the problem of reaching the maximum number of eligible students is not unique to emergency aid programs. But because emergency aid is intended to support students during a time of crisis when they are likely stretched thin—and when receiving funding could make the difference between dropping out and staying enrolled—clear communication is all the more critical.

Recommendation: Improve communications and outreach.

To help more students access the funds they are eligible for, NASPA recommends that colleges focus on improving the content and methodology of their outreach to students. Communications should clearly and consistently outline eligibility requirements and opportunities to apply for funding. Given that students facing emergency financial circumstances may be less engaged than usual, it is important that outreach be frequent and that administrators use multiple modes of communication. This can include direct outreach, such as one-to-one emails or phone calls, as well as public information sharing, such as posting emergency aid information on the college website. While frequent direct outreach may feel less critical outside of a national crisis, it may still be necessary given that students facing individual emergencies may not know about opportunities for additional funding.

Colleges might also consider talking to students to get feedback on the communications they are sending. Keep in mind that the students who are the easiest to get in touch with are also the ones who are most likely to have received outreach about emergency aid already—especially if the college recruits students via email or if they only communicate with students who are already engaged with the financial aid office. MDRC has published several resources, listed at the end of this brief, that colleges can use to improve their communications and outreach to students. While there will always be some students that colleges do not connect with, getting the message out is essential to helping students get the financial support for which they are eligible.

EQUITABLE DISTRIBUTION OF FUNDS

While students across and within institutions were affected differently by the COVID-19 crisis, students with low incomes and students of color were often hardest hit.[3] College administrators voiced concerns about equity and described the steps they took to increase the equitable and unbiased distribution of CARES Act funds, such as using a committee to award aid or masking student identifiers. Administrators in the focus groups described equity-focused policies such as using block grants to ensure that students with expected need were automatically receiving funds, whether they requested it or not.

Few administrators described taking any steps to check whether they were achieving their equity goals, however. Only 15 percent of those surveyed said they had completed any kind of evaluation of their program to ensure that it was equitably helping their students. Some said they had only looked closely at the data they were required to pull for their report to ED. However, given the magnitude of launching a large-scale emergency aid program during the pandemic, it is not surprising that colleges did not prioritize a systematic review of data on the emergency aid programs and student outcomes.

Recommendation: Ensure that equity is a guiding principle.

If they are to meet their stated general goal of achieving equity, institutions should begin designing their financial aid programs with an equity lens from the start, and then continually reexamine their policies and practices. Colleges can collect and review data on their programs, including data on who applies, who receives aid, and what their outcomes are, to determine if the financial aid office is meeting its goals or if there are areas for improvement. Disaggregating data can help colleges evaluate their ability to serve vulnerable populations in their communities. ED can support this endeavor by incorporating a focus on equity in its reporting requirements, to help colleges prioritize the systematic collection and review of these data.

ADDITIONAL RESOURCES

The full NASFAA report presents a complete list of findings and recommendations for policymakers and practitioners. Here are some additional resources to consider.

Setting up effective emergency aid programs:

- Providing Emergency Aid to College Students in a Time of Crisis
- NASFAA Coronavirus (COVID-19) Web Center
- Emergency Aid For Higher Education: A Toolkit and Resource Guide for Decision-Makers
- NASPA's Landscape Analysis of Emergency Aid Programs

Creating clear student communications:

- The SIMPLER Framework from MDRC's Center for Applied Behavioral Science describes behavioral science principles that can be used to encourage students to respond to college communications about financial aid opportunities.
- This blog post from MDRC includes sample email and text message templates that can help colleges clearly communicate with students about emergency aid and financial aid adjustments.
- Improving Programs Using Students' Voices examines how the Los Angeles College Promise program drew on student feedback and experiences to inform their program improvement efforts.
- Looking Ahead Toward Equity: The College Promise Success Initiative

NOTES AND REFERENCES

1 U.S. Congress, House Ways and Means Committee, "Coronavirus Aid, Relief, and Economic Security Act" (Washington, DC: U.S. Congress House Ways and Means Committee, 2020).

2 National Association of Student Financial Aid Administrators, *An Evaluation of Coronavirus Aid, Relief, and Economic Security Act Funding for Postsecondary Institutions* (Washington, DC: National Association of Student Financial Aid Administrators, 2021). Website: https://www.nasfaa.org/cares_evaluation_report.

3 Krista M. Soria and Bonnie Horgos, "Social Class Differences in Students' Experiences during the COVID-19 Pandemic" (Berkeley: Center for Studies in Higher Education, University of California–Berkeley, 2020); Krista M. Soria, Brayden J. Roberts, Bonnie Horgos, and Katie Hallahan, "Undergraduates' Experiences During the COVID-19 Pandemic: Disparities by Race and Ethnicity" (Berkeley: Center for Studies in Higher Education, University of California–Berkeley, 2020).

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