

# PRIORITIZATION OF STUDENTS FOR CRRSAA (HEERF II) FUNDS

As of March 19, 2021

Unlike the CARES Act, the CRRSAA requires that institutions prioritize students with *exceptional need*, such as students who receive Pell Grants, in awarding financial aid grants to students. However, students do not need to be only Pell recipients or students who are eligible for Pell grants. In addition, the CRRSAA explicitly provides that financial aid grants to students may be provided to students exclusively enrolled in distance education. On the question of undocumented students, international students, and Deferred Action for Childhood Arrivals (DACA) students, ED indicates only that it is exploring additional opportunities for colleges to support such students. Currently, these students cannot receive HEERF dollars because the most recent interpretation from ED, which came from the Trump administration, stated that the 1996 Personal Responsibility and Work Opportunity Act (PROWA), which prohibits certain noncitizens from receiving federal benefits, applies here. (By NASFAA Policy & Federal Relations Team, Published 3/1/2021)

Napa Valley College has used the above criteria to prioritize students as follows:

## 1) ELIGIBILITY CRITERIA

- a) U.S. Citizen or eligible non-citizen
- b) Must have a valid EFC for need determination
- c) Minimum 1000 need

## 2) DETERMINATION OF NEED

- a) Processed FAFSA with a valid EFC (ISIR/SAR not rejected or unresolved SAR C code)
  - Provides calculated EFC
  - Identifies eligible citizenship status
- b) Student Budget based on enrollment status
  - HT or greater, use standard budget to determine need
  - LTHT – use LTHT reduced budget to determine need
- c) Calculation of Need
  - Student budget – EFC = Need
  - Need prioritization
    - (1) Minimum need of 1000
    - (2) Prioritized highest to lowest

## 3) AWARDING PRIORITY

- a) Enrollment Status considerations (due to budget)
  - HT or greater
  - LTHT
- b) Exceptional Need – Highest to lowest