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Supporting Student Basic Needs with Emergency Assistance Funds: Recommendations for Higher Education Institutions

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On January 20, the Biden Administration announced **additional funding and resources** to support students during the COVID-19 pandemic, which has created and exacerbated barriers to postsecondary success. This includes \$198 million in grant funding through the Supplemental Support under American Rescue Plan (SSARP) program, with preference given to institutions with the greatest need including community colleges and other institutions serving a high percentage of students with lower incomes.

Alongside this funding announcement, the Department of Education released **updated guidance** for institutions on using Higher Education Emergency Relief (HEERF) funds to support student success and basic needs. The document includes many valuable recommendations as well as examples of successful programs colleges have created using previous HEERF disbursements. In addition to these recommendations from the U.S. Department of Education, this blog offers best practices schools should follow to meet student needs during the pandemic and beyond, as students of color, student parents, and students with lower incomes make up an increasing proportion of degree seekers.

1. Avoid over-reliance on FAFSA information to target need-based support.

Department of Education guidance recommends colleges use information captured by the Free Application for Federal Student Aid (FAFSA), including students' expected family contribution (EFC), to target assistance to students with the greatest need. This includes using FAFSA information to communicate with students about federal benefits they may be eligible for, such as the Supplemental Nutrition Assistance Program (SNAP). The Consolidated Appropriations Act of 2021 provides **temporary student exemptions in SNAP** to allow more students to be eligible for food benefits during the COVID-19 public health emergency.

The FAFSA can be a useful tool to identify students at higher risk for economic insecurity. However, relying on EFC overlooks students whose financial reality has little to do with their parents' reported income. This can include students who have moved out and become financially independent, but who are under the age of 24 and therefore required to report parental income. This can also include students who are disconnected from their families due to social or political reasons, like many LGBT students. Additionally, relying on FAFSA information overlooks students who are not eligible for federal financial aid, such as international students or those who have not made **satisfactory academic progress** (SAP) towards their degree.

Institutions may reach more students by committing to a **targeted universalism** approach. Under this model, a percentage of available financial assistance would go to all enrolled students who receive some form of financial aid regardless of their families' calculated EFC. This would include students who may be ineligible for federal financial aid, but who receive institutional need-based aid from their university. At schools where international students do not receive institutional aid, the administration should work with the campus office of international services to identify international students with financial need, provide translation and interpretation services to assist in completing any required paperwork, and disburse funding and other forms of assistance.

Remaining funds would be distributed in proportion to students' financial need. Schools can measure need via the EFC reported on the FAFSA, but can also use other approaches such as participation in university-run basic needs programs like campus food pantries, eligibility for federal public benefits such as SNAP or Medicaid; or self-attestation of financial need, which has been used successfully by **student-run mutual aid groups**. Should students receive financial assistance in excess of their actual need, institutions can set up an option to waive or return and redistribute these funds to other students.

Finally, institutions should communicate information about eligibility for federal benefits programs and other external basic needs support to all students, not only those with lower calculated EFCs. Using HEERF and SSARP funding to strengthen university-run case management services can help students with questions about the application process determine their eligibility and successfully complete benefits enrollment forms. Allowable costs can include specific training for existing staff members on navigating federal benefits programs, hiring additional staff for roles focused on basic needs support, creating communications and outreach materials, and creating paid positions for students to serve as **peer mentors** and support staff.

2. Reduce administrative burden on students to access support.

Wherever possible, institutions should prioritize distributing assistance in a way that does not add an additional administrative burden on students. In order to distribute aid, many institutions have required students to complete an application for assistance; submit information about their personal finances, household information, transportation access, student parent status, or other identifiers; or complete forms verifying their acceptance of emergency assistance before receiving funds. These processes create additional barriers for students, particularly those who are already balancing multiple responsibilities in addition to their education, such as parenting or part- or full-time employment, or have less access to documentation because they are experiencing homelessness or are estranged from their families.

In providing direct assistance to students, such as through emergency financial aid grants, institutions should make payments automatic where possible, using information already provided by students through registration. For more specific forms of assistance, there may be a valid need to collect additional information from students not captured in the registration process. For example, an institution may want to provide specific support for student parents through subsidized on-campus childcare; however, many colleges do not collect **good data** on the number of students who are parents or caring for younger children. In these situations, colleges should make the process for submitting information and receiving assistance as streamlined as possible and invest in staff to help students complete requirements.

3. Support existing mutual aid and basic needs infrastructure, including student-led initiatives.

Schools have **a great deal of flexibility** in spending institutional portions of HEERF funding, as well as SSARP funds. Under **Section 2005 of the ARP**, the primary requirements are that institutions use “some portion” of institutional funding to implement evidence-based practices for mitigating the spread of COVID-19; and to communicate with financial aid applicants about aid adjustments due to changes in students’ economic circumstances. Institutions otherwise have wide latitude to address COVID-related disruptions in a variety of ways, including subsidizing basic needs programs, providing additional grant payments to students, and hiring and paying support staff.

Many colleges have some existing infrastructure for supporting student basic needs through programs like physical and mental health centers, case management, and on-campus childcare—and have already used institutional HEERF funding to strengthen these programs. However, because demand for these services often outweighs institutions’ capacity, since before the pandemic, student- and community-led initiatives have filled gaps through mutual aid funds, food pantries, housing shares, and “free stores.” These support networks, which tend to be unaffiliated with universities and sometimes face backlash from administration, have **lower barriers to access**, strong word-of-mouth promotion, and are often most in tune with the real needs of other students.

In putting emergency federal funding to best use, schools should not only invest in official institutional basic needs infrastructure, but support and work in collaboration with these grassroots initiatives to meet both immediate and long-term student needs. At a bare minimum, this includes consulting with student

leaders on best practices. Schools can also support student and community groups by providing physical meeting and storage space; creating paid student employment opportunities to staff campus assistance centers or coordinate basic needs networks; or providing grants to student groups organizing basic needs support.