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#	Question
1	Good afternoon. Quick inquiry - will the slide packet be emailed out after the webinar?
2	my microphone/speaker does not work. Do you have a call in number?
3	Will these slides be available after the webinar? Thank you!
4	will you be distributing handouts?
5	Can we get a copy of the slides?
6	<p>If we already filed our final report but did not specifically show the direct outreach to financial aid applicants, can we resubmit with that information. We have the costs accounted for but did not break it out on our report.</p> <p>If you mean on your quarterly report, that's probably fine. Per Department of Education webinars, institutions are able to revise quarterly reports and re-post to their website. Be sure to consider the dates used. You still have to file the annual report which we believe will have a question about how you met this requirement.</p>
7	<p>The ARPA FAQs #39 states "The Department does not intend an NCE to extend longer than 12 months, but the Department intends to be very flexible in offering an initial NCE."</p> <p>We requested a no-cost extension months ago and finally got an answer in early February.</p> <p>Can the no cost extension can be requested for Financial Aid portion only?</p> <p>Yes</p>
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10	<p>Encumbrances will need to be part of the extension, correct? In order to spend the money on those, the grant HAS to be extended. Supply chain and labor shortages have caused issues.</p> <p>We believe the best option on this would be to request an extension IF you will have open, unpaid encumbrances at the end of the grant period. Keep in mind you have 90 days to drawdown your reimbursement for expenditures, so if the encumbrance isn't fulfilled within that time period, it could be a problem where you would not have access to those funds.</p>
11	<p>Would a NCE be needed for more than \$5,000 of inventory on hand such as test or facemasks that may not be used by end of the award date?</p> <p>We really aren't sure on this, but normally this wouldn't be an issue as you must purchase items 'in advance' in order to ensure you can meet the need to suppress the spread of the virus.</p>
12	<p>Does everyone have to meet the procurement standards? If the use of the HEERF funds was applied to lost revenue, what is the requirement?</p> <p>For any expenditure where procurement is NOT involved (such as lost revenue or payroll), then no, otherwise you would not need to meet the procurement standards.</p>
13	<p>Regarding procurement policy, what audit findings have you seen being issued?</p> <p>Some of the more common exceptions include: 1) Not having documented policies and procedures, 2) Not following the appropriate procurement methods for purchases (i.e. micropurchases, small purchases, etc.) 3) Adequate records - documentation supporting the basis of the decision, rationalization for method used, price analysis.</p>
14	<p>Is the extension process (and timeline) for Student HEERF funds similar to the Institutional HEERF funds?</p> <p>Yes</p>
15	<p>When will we get the template/form for the 2nd annual report? Thanks!</p> <p>The draft template was sent a couple of weeks ago to University contacts listed on the HEERF GAN. We received it from our HEERF agency contact.</p>
16	<p>If our negotiated indirect rate is based on salary, what can we do to claim some indirect costs?</p> <p>We believe you should still be able to apply this rate to supply purchases. The most conservative approach would be to use your off campus rate or the 10% diminimus rate</p>
17	<p>Annual report is due early 2022. Can you give us a specific date for when it is due this year?</p> <p>Reporting period will open April 11th and must be completed by May 6, 2022. It appears this will be an online data collection similar to last year.</p>
18	<p>Can we get a copy of the slides for this presentation? Thanks!</p>

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19	Follow up to that question, when is this effective? I believe HEERF III
20	<p>The news is reporting the pandemic impact on supply chain is a significant contributor to inflation. Where costs of supplies have risen greatly due to inflation, are these increased costs eligible for HEERF support?</p>
	<p>Probably best to discuss this with your Dept of Ed Program Manager, but yes, it does seem reasonable to charge increased cost due to supply chain issues to HEERF.</p>
21	FYI the annual report questions are available — will be open April 11- May 6
22	We were approved for our no cost extension as well at Cowley College.
23	<p>Apologies if someone else asked this. Can you give us directions for how to file an extension for HEERF funds use? Thank you.</p>
	<p>Refer to the presentation slides for this information.</p>
24	Should reporting be on encumbrance, expenditure, or when drawn?
	<p>Draw downs are normally based on actual expenditures. Also see question #44 and related answer.</p>
25	Looking at SSARP for additional student receivables write-off, do you find this acceptable?
	<p>We have not seen specific guidance regarding SSARP.</p>
26	<p>We just need to follow your outline for the extension? Is there a form? And submitted through email to our program specialist.</p>
	<p>No form, just filed via an email.</p>
27	<p>Our indirect rate is for salaries. We charged contract tracing salaries to HEERF. Can we charge the indirect rate on these salaries we already submitted to HEERF?</p>
	<p>If the salaries you charged for contract tracing are included in the base of the indirect cost pool, then, no, you would not be able to charge an indirect rate on those salaries</p>
28	I know this is being recorded. Is it going to be posted?
29	<p>For the NCE, if there are new allowable costs incurred during that extension period, could those costs be claimed or does the NCE only extend the claiming period?</p>
	<p>You will have to provide a budget as part of the NCE that details how you are spending the remaining funds. However, if that spend changes (perhaps an expense is less than expected), you would reach out to your Program contact for permission to rebudget the remaining funds to a different expense. We think it would be allowed.</p>
30	<p>This is not a question, but I would like to mention that while the data requirements for the institutional portion of the annual report are not that difficult, the data requirements of the student portion are extremely cumbersome, requiring data reporting back to 2019, requesting reporting on a calendar year basis when the referenced IPEDS data is reported on an academic year basis, and pulling specific data items not typically tracked and reported by institutions.</p>
31	<p>If an institution elects to discharge student debt under #26, the FAQ indicates that complete balances can be discharged. Is there a requirement to estimate how much of the discharged balance is related to coronavirus, and consider only that portion as lost revenue?</p>
	<p>You can only discharge debt incurred since 3/13/2020, the start of the pandemic. You can discharge any debt incurred during that time.</p>
32	<p>Can you draw down 100% of the institutional HEERF III funds before spending 100% of the student HEERF funds? It was not clear if the same pro-rata applied to HEERF 3 like it did HEERF 2.</p>
	<p>You can, but there are revenue recognition considerations to review. Also, if you don't spend all of the Student money you would have to return an equal portion of the institutional funds.</p>

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33	<p>Lois mentioned Direct and Indirect costs are easy to identify. We are in the middle of a request for new federal Indirect Cost Rate. Is there a good source that someone can suggest? We have divulged in a host of information, but still lacking some specifics.</p>
	<p>Direct costs = are costs which are allowed to be reimbursed under the federal guidelines and which are specifically identified with a particular award and accounted for separately. Indirect cost = costs incurred by the University in support of general operations but are not attributable specifically to a federal grant.</p> <p>Developing an indirect cost rate is fairly complex and cumbersome. Many institutions engage a 3rd party to assist in developing and requesting an ICR. Some resources might include:  <a href="https://www.thomsongrants.com/sites/grants/files/2017-07/Indirect%20Cost%20Rates.pdf">https://www.thomsongrants.com/sites/grants/files/2017-07/Indirect%20Cost%20Rates.pdf</a>;  <a href="https://www2.ed.gov/about/offices/list/ocfo/intro.html">https://www2.ed.gov/about/offices/list/ocfo/intro.html</a></p>
34	<p>Should an IHE that had previously received funding under 18004(a)(1) student and institutional portion, have already received the letter inviting an application for SSARP funding? Vicki mentioned a letter about SSARP applications due 4/4/22 and that all institutions are eligible to apply but I wanted to confirm. Thanks!</p>
	<p><i>You may not have received a letter, but you can still apply.</i></p>
35	<p>Would you need to follow procurement rules if 99% was used on lost revenue but had to put in something to fit the "practice, monitor and suppress the coronavirus"?</p>
	<p><i>We know of no exceptions to following the procurement rules when spending federal funds.</i></p>
36	<p>Thank you for the session! I have another meeting to attend.</p>
37	<p>How do you think HEERF audits will be conducted? Through Single Audit? I know DOE is looking now at websites, but what about the reports and expenditures?</p>
	<p><i>Yes, it is thru the Single Audit.</i></p>
38	<p>If we used HEERF II for lost revenue in FY21, can we use HEERF III for lost revenue in FY22?</p>
	<p><i>Yes</i></p>
39	<p>I think the DoE sent the final annual report form out yesterday with an email from the DoE.</p>
40	<p>Do you have to have a signed contract or purchase order to document the amount of the requested funds or is a budgeted amount sufficient?</p>
	<p><i>Normally a PO/Encumbrance is used for non-micropurchases. Micropurchases and salaries would be just a budget.</i></p>
41	<p>If you forgive debt with the inst portion, do you record it as grant revenue or just a reduction of receivables?</p>
	<p><i>Credit AR / Debit HEERF Expense and Credit HEERF revenue / Debit Cash</i></p>
42	<p>Follow up to indirect rate question: Negotiated rate is 50% of base salary, can we use 10% MTDC instead?</p>
	<p><i>Yes, 10% diminimus rate should be acceptable.</i></p>
43	<p>If direct staff time, such as public health employees to staff a testing/vaccine clinic are charged to HEERF? Could not these wages be assessed indirect costs? These are not facility or administration salary costs identified in the indirect cost pool.</p>
	<p><i>We believe if these salaries are NOT in your pool, then yes, IDC could be applied.</i></p>
44	<p>There seems to be some department guidance / questions schools are receiving about the reporting being based on draws in the quarter vs. expenditures. Are you seeing this with your clients?</p>
	<p><i>It appears the quarterly report is to be based on expenses/expenditures for the quarter. While we believe that the Department would expect that the drawn down would occur within a short time window of the date of expenditure, there could be a timing difference. You could consider using the explanatory notes section to explain any difference between expenses/expenditures and timing of drawn down from G5.</i></p>
45	<p>Thank you!</p>