



July 14, 2021

TO: Financial Aid Administrators

FROM: Becky Thompson, Director of Student Financial Assistance

SUBJECT: Additional Information – Undocumented Student Relief Grants

Thank you for providing funding to eligible students through the Undocumented Student Relief Grant (USRG). Below is more information on the original federal source of funding that was then distributed through state legislative action via House Bill 1368, Section 14, and the WSAC guidance that followed on March 1, 2021.

We ask that you complete required reporting by July 30, 2021, by clicking on this survey link:
<https://survey.alchemer.com/s3/6298245/Undocumented-Student-Relief-Grant-Final-Reporting>.

FEDERAL FUNDING:

Undocumented Student Relief Grant funds under the agreement are made available from the federal Coronavirus Relief Fund (CRF) and are subject to Section 601(a) of the Social Security Act, as amended by section 5001 of the Coronavirus Aid, Relief, and Economic Security Act (CARES Act).

Federal Agency: US Dept. of the Treasury
Federal Funding: Coronavirus Relief Fund
CFDA Number: 21.019

Federal guidance on the use of CRF funds on January 15, 2021 is available at:
https://home.treasury.gov/system/files/136/CRF-Guidance-Federal-Register_2021-00827.pdf

The provisions of the Uniform Guidance (2 CFR part 200) applicable to grant agreements do not apply. The CRF payments constitute “other financial assistance” under 2 CFR 200.40. CRF payments are considered to be federal financial assistance subject to the Single Audit Act (31 .S.C. 7501–7507) and the related provisions of the Uniform Guidance, 2 CFR 200.303 regarding internal controls, 2 CFR 200.330 through 200.332 regarding subrecipient monitoring, and subpart F regarding audit requirements. Students receiving USRG funding are beneficiaries and not subject to audit per 2 CFR 200, subpart F.

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ALLOWABLE COSTS

The initial guidance provided on March 1, 2021 noted that the funds must be disbursed to students by June 30, 2021. In addition, the federal guidance clarifies what payments from the CRF may be used for.

The CARES Act provides that funding from the CRF may only be used to cover costs that are **necessary** expenditures **incurred due to the public health emergency** with respect to the Coronavirus Disease 2019 (COVID-19). The U.S. Department of the Treasury’s guidance states that the funding may be used for expenditures incurred to respond to second-order effects of the emergency such as providing economic support to those suffering from interruptions due to COVID-19. Their guidance clarifies the term “necessary” to mean that the expenditure is reasonably necessary for its intended use using reasonable judgement.

WSAC has determined that demonstrating financial need, as required for eligibility, meets the “necessary” CARES Act requirement.

RECORDS MAINTENANCE AND AUDIT

Records relating to the state aid programs must be maintained in accordance with RCW 40.14. This law requires all documentation substantiating a student's eligibility for, and receipt of, state aid be maintained for six years in accordance with the Washington State Record Retention Schedule. Financial Aid Administrators at public institutions must coordinate their records retention plan and schedule with their institution's records officer.