

CARES Emergency Aid: Addressing Basic Needs in Compliance With ED's Guidance

Sara Goldrick-Rab | 4-27-20

CARES funds may be used “to cover expenses related to the disruption of campus operations due to coronavirus.”

While there is broad understanding that students undoubtedly have been impacted by COVID-19, institutions are concerned about the burden of proof for making determinations around how students’ needs for “food, housing, course materials, technology, health care, and child-care expenses” could be justifiably affected by disruption of campus operations, especially when the institution is non-residential. With its lack of clarity, the guidance has put at a distinct advantage those institutions and students who are residential -- a small and relatively wealthy group. But an evidence-driven understanding of how problems with food, housing, course materials, technology, health care, and child-care expenses occur leads to the proper use of CARES dollars for non-residential students as well.

Below, I explain how each basic needs challenge is plausibly related to the disruption of campus operations. These breakdowns within student basic needs categories can be used as a directional basis for institutions to justify making awards to students under CARES that satisfies this condition.

Housing

1. Students struggling to pay rent often seek on-campus support to access public benefits programs and identify alternatives; access to those individuals was compromised by campus disruptions.
2. These students also seek support from emergency aid funds, which were rapidly depleted by campus disruptions.
3. Students without a place to stay often sleep on campus; campus buildings were shuttered during campus disruptions.
4. Since classes were canceled, many students were urged to leave the area around the campus and “go home.” These students were in leases and still had to pay rent -- often while also moving to a new location.

Food

1. Students with meal plans (often covered by financial aid dollars) were unable to use them.
2. Students with meal subsidies (swipes or other vouchers) were unable to use them for on-campus food.
3. Students using the campus food pantry were unable to access the pantry.
4. Students struggling to afford food often access on-campus assistance to connect to the SNAP program; access to those individuals was compromised by campus disruptions.
5. These students also seek support from emergency aid funds, which were rapidly depleted by campus disruptions.

Technology & Learning Sources

1. Students use on-campus labs, printers, and libraries for computer access and were unable to access them.
2. Students use on-campus WiFi to complete work and may no longer have reliable access to wireless or internet.
3. These students also seek support from emergency aid funds, which were rapidly depleted by campus disruptions.

Childcare Expenses

1. Students using on-campus childcare could not use it.
2. These students also seek support from emergency aid funds, which were rapidly depleted by campus disruptions.

Of course, in addition to these concerns, many students lost on-campus jobs, including work-study, due to campus disruptions. These students therefore struggled with many of the expenses listed above.

[Large numbers](#) of students were struggling with basic needs insecurity before the pandemic. Now, **[80% of students have already reported being impacted by COVID-19](#)**. This likely exacerbated material hardships for some students and newly created them for others. It is reasonable for institutions to take the Secretary of Education at her word that the Department is leaving “institutions with significant discretion on how to award this emergency assistance to students,” and “that each institution may develop its own system and process for determining how to allocate these funds, which may include distributing the funds to all students or only to students who demonstrate significant need.” The intent of the CARES Act is to support students forcefully and rapidly, and in the spirit of an economic response bill, institutions should make a strong justification for awarding students on the above premises. These funds were meant to be activated, not wasted or left unspent, in the wake of the largest economic and public health crisis of our time.