



UNITED STATES DEPARTMENT OF EDUCATION  
OFFICE OF POSTSECONDARY EDUCATION

December 3, 2020

Dear Project Director:

We have now embarked upon a new fiscal year (FY) as of October 1. The last few months have been challenging for all of us as we maintain our dedication to providing a high-quality education to the Nation's students, in spite of difficulties posed by the Coronavirus Disease 2019 (COVID-19) pandemic. Despite these challenges, I want to assure you the staff at the U.S. Department of Education (Department) is here to assist you in implementing your grant project and keeping it operating smoothly.

As a follow up to the [July 1, 2020, memorandum](#) issued by Robert L. King, Assistant Secretary for the Office of Postsecondary Education (OPE), the Student Service Division would like to provide information on additional flexibilities to Federal TRIO Programs (TRIO) and Gaining Early Awareness and Readiness for Undergraduate Programs (GEAR UP) grantees impacted by the COVID-19 pandemic.

The Coronavirus Aid, Relief, and Economic Security (CARES) Act grants the Department authority to "modify the required and allowable uses of funds"<sup>1</sup> for the following programs in the Higher Education Act of 1965, as amended (HEA), at the request of an institution of higher education (IHE) or other grant recipient:

- Title IV, subpart 2 chapter I (TRIO Programs)
- Title IV, subpart 2 chapter II (GEAR UP)

While the CARES Act does not describe the extent of permissible modifications to these programs, the Department will, for example, entertain the following requests for additional flexibilities that may be granted by program:

- **Ronald E. McNair Postbaccalaureate Achievement (McNair) Program**

Projects under the McNair Program may request approval to use carryover funding (any remaining funding from a budget year prior to 2020-21) and/or reallocate travel funding for the provision of additional stipends/increased stipends for participants to minimize disruption to activities and to enhance virtual services for participants.

Due to the interruptions of COVID-19 and the flexibilities extended to the Secretary under section 3518 of the CARES Act, the Department will entertain requests to increase

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<sup>1</sup> Section 3518 of the CARES Act, P.L. 116-136; 134 Stat. 281.

the dollar amount of stipends during the academic and summer component. As described at the end of this letter, requests must be submitted to the project's assigned program specialist. The Department has not designated a specific dollar amount; however, all requests must adhere to the requirement to be reasonable and necessary under [Subpart E of 2 CFR part 200](#), the Cost Principles of the *Uniform Administrative Requirements, Cost Principles, And Audit Requirements for Federal Awards* (Uniform Guidance).

McNair projects also may request approval to use carryover funding and/or reallocate travel funding, as described above, to purchase, lease or rent computer hardware, software, supplies and equipment to support student completion of on-site and remote student research and other scholarly activities.

- **Student Support Services (SSS) Program**

Under SSS Program regulation [34 CFR § 646.30](#), grantees are allowed to provide Grant Aid to eligible participants. Due to the interruptions of COVID-19 and the flexibilities extended to the Secretary under section 3518 of the CARES Act, the Department will entertain requests to allow SSS projects to amend their approved budgets to include Grant Aid.

In addition, the Department will also entertain waiver requests for the following matching requirements: waiver of the match of Federal funds used for grant aid, in cash, from non-Federal funds, in an amount that is not less than 33 percent of the total amount of Federal grant funds used for Grant aid; and waivers of the matching requirement for institutions who are not eligible to receive funds under part A or B of Title III or Title V of the HEA, as amended. Grantees will not be allowed to use more than 20 percent of the Federal program funds awarded to the grantee each year for Grant Aid.

These flexibilities are extended to SSS grantees that have one or more years remaining under the FY 2015 grant. Grantees funded under the FY 2020 competition are not eligible for these flexibilities.

- **Talent Search (TS) Program**

The Department may consider requests from grantees for providing stipends for participants that participate in the project summer activities beginning with budget period 2020-21.

- **Upward Bound (UB), Upward Bound Math and Science (UBMS), and Veterans Upward Bound (VUB)—Stipends**

The Upward Bound, Upward Bound Math and Science and Veterans Upward Bound regulation [34 CFR § 645.42](#) allows stipends for participants who are enrolled in the project on a full-time basis. During the COVID-19 interruption of services, the Department is aware that many institutions are providing distance learning options to students, and as such, a student that continues to be enrolled full-time through distance learning remains eligible to receive allowable stipends.

Currently the allowable stipend for a participant per regulations for the UB and UBMS program may not exceed \$40 a month during the academic year and \$60 a month during the summer component not to exceed a three-month period, except youth participating in a work-study position may be paid \$300 per month during the summer school recess. The allowable stipend for a participant per regulations for the VUB Program may not exceed \$40 a month. Due to the interruptions of COVID-19 and the flexibilities extended to the Secretary under section 3518 of the CARES Act, the Department will entertain requests to increase the dollar amount of stipends during the academic and summer component.

As described at the end of this letter, requests must be submitted to the project's assigned program specialist for approval before increases may occur. The Department has not designated a specific dollar amount; however, all requests must adhere to the requirement to be reasonable and necessary under [Subpart E of 2 CFR part 200](#), the Cost Principles of the Uniform Guidance.

In addition, students participating in the summer bridge component of an UB or UBMS project may also receive a stipend in accordance with the amounts allowable per regulations or at an approved increased amount.

- **Upward Bound (UB) and Upward Bound Math and Science (UBMS) Programs—Computers for Students Participating in Summer Bridge Component**

Under the UB and UBMS program regulation [34 CFR § 645.13](#), UB and UBMS projects may provide a summer bridge component to those participants who have graduated from secondary school and intend to enroll in postsecondary education. Students participating in an UB or UBMS summer bridge component may be provided with a computer to complete the bridge component activities. In addition, the computer may be utilized during the participant's transition into postsecondary education as long as the project can verify that the participant is enrolled in postsecondary education and a certification is received from the enrolling institution that the participant has not been granted the use of a computer. If the participant has received a computer from the enrolling institution, the participant must return the computer issued by the project.

- **Calculating Prior Experience Points for Fiscal Year (FY) 2021 Competitions under the Educational Opportunity Centers (EOC) and Talent Search (TS) Programs and Beyond**

As you are aware, for each competition, the Department uses the scores awarded for the second, third and fourth year of expiring grants to calculate the final prior experience (PE) points. The average of the three applicable years' PE scores earned by current grantees that submit an application under any of the TRIO program competitions is added to the average score awarded by the three non-Federal reviewers to determine the final score. Typically, this would mean that for the FY 2021 EOC and TS competitions, the PE points earned for project years 2017-2018, 2018-2019 and 2019-2020 would be used to calculate the final PE points.

We have determined that due to the challenges faced by current grantees under the EOC and TS Programs as a result of the national pandemic, the Department will only utilize

the highest-scoring two years from the three years of data submitted by each grantee to calculate PE points under the FY 2021 TS and EOC competitions.

Please note that the Department has not made a determination regarding calculation of PE points for the scheduled competitions in FY 2022 under Upward Bound, Upward Bound Math and Science, Veterans Upward Bound and the Ronald E. McNair Postbaccalaureate Programs. Further information will be provided once planning begins in the fall or winter of 2021.

- **GEAR UP Program**

The GEAR UP program statute currently provides flexibilities for GEAR UP Partnership projects, which allows for match waiver for a GEAR UP Partnership projects that can demonstrate it meets the waiver requirements as described in the [GEAR UP regulations](#). The Department will be using its authority provided under section 3518 of the CARES Act to extend these same flexibilities to our State GEAR UP grantees.

*Requesting Grant Modifications*

Modification requests must be directed in writing to your respective program specialist and describe the proposed use of funds, amount, and brief rationale for each specific proposed modification. As noted earlier, requests must adhere to the requirement to be reasonable and necessary under [Subpart E of 2 CFR part 200](#), the Cost Principles of the Uniform Guidance. OPE will respond to any request and will follow up with an approval, denial, or, when necessary, request for further clarification.

Requests must continue to directly serve project participants and not replace services that, during the time of the COVID-19 pandemic, are already being offered. The CARES Act places a time limit on this flexibility, from March 13, 2020 and ending on September 30 of the FY following the end of the qualifying emergency, which, as of now, is until September 30, 2022.

Approval letters from the Department will indicate the length of time in granting the proposed modifications, with the possibility of future time extensions based on the course of the COVID-19 pandemic.

Thank you for your continued commitment to support Federal TRIO and GEAR Up participants during this time through the ongoing delivery of services to them. Please contact your assigned program specialist if you have any questions.

Sincerely,



Christopher J. McCaghren, Ed.D.  
Deputy Assistant Secretary  
Higher Education Programs