

Stephanie Valentine

PRA Coordinator, Strategic Collections and Clearance, Governance and Strategy Division, Office of Chief Data Officer, Office of Planning, Evaluation and Policy Development  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, D.C. 20202

August 23, 2021

Re: Docket No. ED-2021-SCC-0093

To Whom It May Concern:

This letter is submitted on behalf of the 15 undersigned members and partners of the Postsecondary Data Collaborative (PostsecData) in response to the proposed annual data collection under the Higher Education Emergency Relief Fund (HEERF). PostsecData is a nonpartisan coalition of organizations committed to the use of high-quality postsecondary data to improve student success and advance educational equity.

In this time of crisis and over the course of the eventual recovery, the quarterly and annual reporting required of institutions who received HEERF funding will be an essential resource for policymakers and researchers to understand the extent of the crisis and relief efforts related to higher education. For this reason, PostsecData appreciates the Department of Education's (ED) thoughtful approach to the proposed annual data collection at institutions receiving funding through HEERF.

Because the data generated through the HEERF annual reporting provides critical information and is unlikely to be available elsewhere, PostsecData strongly supports ED's proposal to include 1) disaggregation of student emergency financial aid disbursements, by students' race/ethnicity, gender, and age, 2) reporting of employment figures for instructional and non-instructional staff, and the 3) the use of comparison groups to contextualize the completion and withdrawal rates for HEERF recipients.

This letter explains PostsecData's support for these decisions and provides considerations for how to reduce institutional burden while capturing the critical information these changes elucidate. We conclude with recommendations for several minor additions to the reporting form.

### **1. Disaggregation of student emergency financial aid disbursements**

PostsecData would like to thank ED for incorporating our [recommendation](#) to maintain disaggregation of emergency aid disbursements for student who do and do not receive a Pell Grant, as well as expanding the required disaggregation to include race/ethnicity, gender, and age groups. PostsecData is particularly encouraged by the disaggregation across race/ethnicity groups, and strongly supports the inclusion of

these measures. Because Black, Latinx, Indigenous, and Asian American and Pacific Islander students and students from low-income backgrounds have been disproportionately impacted by the health, economic, and educational upheaval the pandemic has caused, the publication of data on the extent to which institutions are addressing these disparities is necessary to advance racial and socioeconomic equity.

The use of federal definitions of race/ethnicity, gender, and age group categories used in pre-existing mandatory data collections, including the Integrated Postsecondary Education Data System (IPEDS) should minimize burden on institutions by relying on information those schools have readily available. In addition, collecting disaggregated information on the total spending for student financial grants, rather than requiring separate reporting on each individual funding stream, will help reduce the added burden on institutions to what is strictly necessary. This effort to minimize burden will enable the data collection to compile critical information on the substantial federal investment in ways that do not constrain institutional capacity.

## **2. Reporting employment figures for instructional and non-instructional staff**

PostsecData is pleased to see the inclusion of separate reporting for instructional and non-instructional staff included in the proposal for revised data collection. Because these categories serve unique functions for colleges and universities, this more granular information will provide a way to assess how the distribution of staffing has changed in the aftermath of COVID-19. In addition, because these categories are aligned with IPEDS reporting requirements, the additional burden in reporting more detailed employment figures is minimized.

## **3. The use of comparison groups to contextualize HEERF recipients' completion and withdrawal rates**

Finally, PostsecData is pleased to see the additional requirements for completion and withdrawal reporting for non-HEERF recipients, as well as for 2018 and 2019 cohorts. We believe this information will better enable researchers and policymakers to understand how completion and withdrawal rates shifted for all students through the course of the pandemic, and the extent to which emergency financial aid served to counteract these disruptions in students' educational trajectories.

### **Additional considerations**

PostsecData would like to reiterate our support for ED to publish a user-friendly machine-readable file at the institution level to maximize the value of the data submitted in these reports. We strongly support the publication of the resulting information. Also, as noted in our [September 2020](#) letter, we encourage ED to collect information on whether students were required to submit documentation of their difficulty in meeting expenses, as well as any new academic requirements put in place for emergency fund eligibility. Finally, in the interest of student privacy, PostsecData would also encourage collection of information regarding whether institutions communicated with students about how their data would be collected, secured, and shared and for what purposes.

The undersigned members and partners of PostsecData appreciate the modifications made to the annual reporting form and encourage ED to adopt these proposed changes. Doing so will provide transparency



to students, researchers, and policymakers around institutional spending under HEERF. If you have any questions, please contact Mamie Voight, interim president at the Institute for Higher Education Policy (mvoight@ihp.org or 202-587-4967).

Sincerely,

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Advance CTE  
Center for American Progress  
Corporation for a Skilled Workforce  
Georgetown University Center on Education and the Workforce  
Higher Learning Advocates  
Institute for Higher Education Policy  
Jobs for the Future (JFF)  
National Association for College Admission Counseling  
NCHEMS  
New America  
Pennsylvania's State System of Higher Education  
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