



Kate Mullan

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U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

January 20, 2021

RE: Docket No.: ED-2020-SCC-0154

To Whom It May Concern:

This letter is submitted on behalf of the 16 undersigned members and partners of the Postsecondary Data Collaborative (PostsecData) in response to the proposed quarterly data collection under the Coronavirus Aid, Relief, and Economic Security (CARES) Act Higher Education Emergency Relief Fund (HEERF).ⁱ PostsecData is comprised 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 under CARES will be an essential resource for policymakers and researchers to understand the extent of the crisis and relief efforts related to higher education.

To this end, PostsecData appreciates the addition of quarterly reporting on the institutional portion of HEERF; however, these reports exclude the emergency financial aid grants provided to students through the CARES Act. Likewise, PostsecData thanks the Department for incorporating many of our previous recommendationsⁱⁱ into the HEERF annual data collection form, but concerns remain that these data are not collected frequently enough to generate a clear understanding of the timing of disbursements of emergency aid funds.

To address these concerns, we recommend the addition of a new category in the quarterly form that asks institutions to report the total amount of funds awarded by quarter to students for emergency aid through any component of HEERF, including the student aid and institutional portions of Section 18004(a)(1), Section 18004(a)(2), and Section 18004(a)(3). This, in addition to existing data collection on funds awarded through institutional aid, will provide needed insights, in a centralized location, on how institutions allocated financial aid to students throughout the year.

The addition of quarterly reporting on the total amount of emergency financial aid grants to students will provide more nuanced insight into the timing of award disbursement—a key element of understanding the timing and impact of the taxpayer investment in the lives of students.

As such, the undersigned members and partners of PostsecData urge the Department to incorporate quarterly reporting for emergency financial aid grants to students. If you have any questions, please contact Mamie Voight, senior vice president of research and policy at the Institute for Higher Education Policy (mvoight@ihep.org or 202-587-4967).

Sincerely,

AccuRounds
Achieve Atlanta
Center for Law and Social Policy (CLASP)
Future of Privacy Forum
GW Institute of Public Policy, George Washington U.
Higher Learning Advocates
Institute for Higher Education Policy
Knowledge Alliance
Manufacturer's Education and Training Alliance
National Association for College Admission Counseling (NACAC)
NCHEMS
New America Higher Education Program
Student Veterans of America
The Institute for College Access and Success
Third Way
uAspire

ⁱ Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Quarterly Budget and Expenditure Reporting under Cares Act Sections 18004(a)(1) Institutional Portion, 18004(a)(2) and 18004(a)(3). 85 FR 83068. (20 December 2020). Federal Register: The Daily Journal of the United States Government. Retrieved from: <https://www.federalregister.gov/documents/2020/12/21/2020-28000/agency-information-collection-activities-submission-to-the-office-of-management-and-budget-for>

ⁱⁱ PostsecData provides comments on the Higher Education Emergency Relief Fund (HEERF) reporting (September 2020). Retrieved from: http://www.ihep.org/sites/default/files/uploads/postsecdata/docs/resources/postsecdata_heerf_reporting_comment_letter_final.pdf