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400 Maryland Avenue, SW
Washington, D.C. 20202

December 2, 2020

RE: Docket No. ED-2020-SCC-0122

To Whom It May Concern:

This letter is submitted on behalf of the 18 undersigned members and partners of the Postsecondary Data Collaborative (PostsecData) in response to the submission of the revised annual data collection for the Higher Education Emergency Relief Fund (HEERF) to the Office of Management and Budget.¹ PostsecData is a nonpartisan coalition of organizations committed to the use of high-quality postsecondary data to improve student success and advance educational equity.

We appreciate that the Department of Education (ED) adopted recommendations from our previous comment letter in this newest iteration of the HEERF data collection,² including:

- Acknowledgement of the importance of publicly sharing resulting data in machine-readable format;
- Adjustment to the wording of revised question 5 on the prioritization of need for student awards;
- Addition of “still enrolled” and “completed” categories to the account of students receiving grant funds to revised question 10; and
- Addition of more frequent quarterly reporting requirements for Budget and Expenditures.³

¹ Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Higher Education Emergency Relief Fund (HEERF) Data Collection Form. 85 FR 69324. (2 November 2020). Federal Register: The Daily Journal of the United States Government. Retrieved from:

<https://www.federalregister.gov/documents/2020/11/02/2020-24170/agency-information-collection-activities-submission-to-the-office-of-management-and-budget-for>

² 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

³ U.S. Department of Education. (2020) Quarterly Budget and Expenditure Reporting under CARES Act Sections 180004(a)(1) Institutional Portion, 18004(a)(2), and 18004(a)(3), if applicable. Retrieved from: <https://www2.ed.gov/about/offices/list/ope/heerf-quarterly-reporting-v131.pdf>

These changes will provide needed insights and more timely reporting on institutional use of HEERF grant funds. However, we were disappointed that ED did not incorporate a number of our recommendations into the revised data collection form, leaving critical questions unanswered about the disrupted higher education experiences of nearly 20 million undergraduate and graduate students as a result of the COVID-19 pandemic.

Transparency is essential, especially in times of emergency. PostsecData recommends that the Office of Management and Budget (OMB) and ED reconsider the following recommendations that would provide important information about how institutions used these funds to support students in crisis, manage operational strain, and the extent to which federal funding tackles racial and socioeconomic inequities.

- Maintain and expand data disaggregation.
- Add overall spending on emergency financial aid to students to the quarterly report.
- Collect more detailed completion and withdrawal rates and employment figures.
- Include minor edits to questions on emergency financial aid grants to students and consider collecting information about institutional data-sharing and use policies.

These proposed changes are described below and annotated as tracked edits and comments in the appendix.

Maintain and expand data disaggregation.

Identifying the number of students and dollar amounts of emergency aid awarded through HEERF is a core component of the proposed data collection, and differentiating between funding to graduate and undergraduate students, Pell recipients, and full- and part-time students (question 6) will be essential in understanding who benefits from the emergency federal aid. The Pell disaggregate is especially important because it will provide information on how much emergency aid went to students who were in an economically precarious position even before the onset of the pandemic. Pell recipients are likely to have been further burdened by COVID-19's economic and educational impact, so transparency about the extent of the support these students received will be of paramount importance to the higher education community in the years to come.

In addition to the disaggregates already included in the form, PostsecData strongly urges ED and OMB to require data to be disaggregated by race/ethnicity. The pandemic has disproportionately impacted the health and economic well-being of Black, Indigenous, and Latinx students, along with their families and broader communities, so disaggregating data on student emergency grants by race and ethnicity is critical to understanding the extent to which the federal funding is tackling these inequities. While this recommendation would require adding columns and permutations to the existing structure, institutions should have student race/ethnicity information readily available due to other required reporting (such as the IPEDS collection).

Add overall spending on emergency financial aid to students to the quarterly report.

We appreciate the addition of quarterly reporting on the institutional portion of HEERF; however, these reports exclude the emergency financial aid grants to students provided by the Coronavirus Aid, Relief, and Economic Security (CARES) Act. We recommend the addition of an overall category in the quarterly form that reports on the total amount of funds awarded by quarter to students for emergency aid. This will provide needed insights, in a centralized location, on how institutions allocated financial aid to students throughout the year. We included an example of this question in revised question 9 in the Appendix.

Collect more detailed completion and withdrawal rates and employment figures.

PostsecData appreciates the addition of students “still enrolled” and “completed” to revised question 10 and recommends that ED and OMB consider how to incorporate a comparison group to gauge withdrawal rates of students who did not receive financial support. Existing or forthcoming data from IPEDS would not necessarily provide comparable data or be measured within the same timeframe to appropriately contextualize outcomes of HEERF recipients.

Similarly, revised question 10 asks for the number of full-time equivalent (FTE) positions in 2018, 2019, as of the start of the pandemic, and at the end of the most recent reporting period. We believe this information will provide valuable insight into how institutional capacity has been impacted by the pandemic and associated stimulus funding provided through HEERF. However, we recommend that ED and OMB adjust the reporting requirements to include separately the number of FTE instructional staff, non-instructional staff, and student undergraduate and graduate employees. Each of these categories serves a unique function for universities, and these categories are aligned with IPEDS reporting requirements, moderating the additional burden in reporting more detailed employment figures. This more granular information would provide a way to assess how the distribution of staffing has changed in the aftermath of COVID-19.

Include minor edits to questions on emergency financial aid grants to students and consider collecting information about institutional data-sharing and use policies.

PostsecData strongly supports data collection examining the processes institutions use to allocate emergency financial aid grants to students under HEERF and believes this data will be extremely important in evaluating these funding strategies in response to the pandemic. PostsecData would like to thank ED for including changes to revised question 5, and we further recommend that institutions report 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.

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. We have included a suggestion for how this question might be framed in the Appendix.

The undersigned members and partners of PostsecData encourage OMB and the Department to adopt these recommendations as they finalize institutional guidance for reporting under HEERF. 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)
Consumer Action
Future of Privacy Forum
Georgetown University Center on Education and the Workforce
Institute for Higher Education Policy
Knowledge Alliance
Manufacturers Education & Training Alliance
NASPA - Student Affairs Administrators in Higher Education
National Association for College Admission Counseling
New America Higher Education Program
Nexus Research and Policy Center
Optimax Systems, Inc.
Postsecondary Analytics
Public Insight Data Corporation
South Asian Fund For Education, Scholarship and Training (SAFEST)
uAspire

**APPENDIX: Higher Education Emergency Relief Fund (HEERF) Data Collection Form
(Both Student Aid and Institutional Portions under Section 18004 of the CARES Act)**

Version October 2020

[NOTE to reviewers: Most respondents will be main campus institutions at the 6-digit OPEID. A small number of additional respondents will be branch campuses at the 8-digit OPEID level that are Minority Serving Institutions (MSIs) or Strengthening Institutions Program (SIP) institutions and received funds under Section 18004(a)(2) of the CARES Act, but their main campus is not designated as an MSI or SIP.]

VERSION 1

This data collection form applies to the following HEERF funds:

- [Student Aid](#) (CFDA 84.425E)
- [Institutional Portion](#) (CFDA 84.425F)
- [Historically Black Colleges and Universities](#) (CFDA 84.425J)
- [American Indian Tribally Controlled Colleges and Universities](#) (CFDA 84.425K)
- [Minority Serving Institutions](#) (CFDA 84.425L)
- [Strengthening Institutions Program](#) (CFDA 84.425M)
- [Fund for the Improvement of Postsecondary Education](#) (CFDA 84.425N)

HEERF Reporting Form

Annual Reporting: This report should be completed based on activities in the applicable reporting periods. If an institution has expended all of their HEERF grant funds by the closing date of the reporting period, they do not have to complete subsequent annual reports. All institutions must submit the First Annual Report. Please indicate in Question 2 if this report is your final annual report.

Annual Report	Due Date	Applicable Reporting Period
First Annual Report	February 1, 2021	March 13, 2020- December 31, 2020
Second Annual Report	February 1, 2022	January 1, 2021—December 31, 2021
Third Annual Report	February 1, 2023	January 1, 2022—December 31, 2022

1) Institutional Identifiers and Contact Information—

a) Institution Name ___ <autofill from G5> _____
DUNS # ___ <autofill from G5> _____

b) Please report on these HEERF grant PR/Award Numbers:

(1) ___ <autofill from G5> _____

(2) ___ <autofill from G5> _____

(3) _____

c) Who is the lead contact for this annual data collection?

Name: ___ <autofill> _____

Title: ___ <autofill> _____ (editable)

Phone: ___ <autofill> _____ (editable)

Email: ___ <autofill> _____

2) <Skip logic question-if funds were expended in the current reporting period, no reporting is required for subsequent years> Did you expend all of your HEERF funds prior to the end of the reporting period, making this your final annual report? ___(Y/N)

3) Reporting on institution websites:

a) CARES HEERF quarterly reporting webpage URL: _____

b) Student Portion Reporting: Provide all active website URLs posted by your campus, or by the institution on behalf of your campus(es), as required by the August 31 notice in the *Federal Register*⁴ (including any URLs that are still active that provide archived information).

i) _____

ii) _____

iii) _____

iv) _____

(option to add more, as applicable)

c) Institutional Portion, (a)(2), and (a)(3) Reporting: Provide all active website URLs posted by your campus, or by institutions on behalf of your campus(es) as required by the quarterly Higher Education Emergency Relief Fund (HEERF) Data Collection Form⁵ (include any URLs that are still active that provide archived information)

⁴ See <https://www2.ed.gov/about/offices/list/ope/heerfreporting.html>.

⁵ See Notice published in the *Federal Register* on July 29, 2020 (85 FR 45629): <https://www.federalregister.gov/d/2020-16429>.

- i) _____
ii) _____
iii) _____
(option to add more, as applicable)

- 4) How did your institution determine which students were eligible⁶ to receive emergency financial aid grants under any of the CARES Act HEERF programs? (select all that apply)
- a) My institution has received an Institutional Student Information Record (ISIR) or Student Aid Report (SAR) on file that verifies student eligibility for Title IV, federal student aid (Title IV aid).
 - b) My institution allowed students to attest to their eligibility for Title IV aid by completing an alternative application form developed by the institution for this purpose.
 - c) My institution used another method for determining which students were eligible to receive emergency financial aid grants under the CARES Act. Please describe: _____
- 5) How did your institution determine which students received emergency financial aid grants to students and how much each student would receive? Please indicate if any of the following strategies were used.
- Did you distribute the same amount to all eligible students⁷ regardless of different circumstances? _____(Y/N). If no,
 - Did you ask students to apply for funds? (Y/N). If yes,
 - Did you use that application to determine the amount of a student's emergency financial aid grant? _____(Y/N). If yes,
 - What needs did you prioritize to determine the amount of the student's award?
 - a. Food ____ (Y/N)
 - b. Housing _____ (Y/N)
 - c. Course materials _____ (Y/N)
 - d. Technology _____ (Y/N)
 - e. Health care ____ (Y/N)
 - f. Child care _____(Y/N)
 - g. Other (Y/N). If yes, please specify_____

⁶ Eligible in this context refers to anyone who could have received grants regardless of how an institution prioritized funding to specific subsets of students

⁷ Eligible students refer to students with a ISIR or SAR, alternative application form attesting to title IV aid eligibility. Please see also the [Interim Final Rule](#) published in the *Federal Register* on June 17, 2020 (85 FR 36494). Community Colleges in California, all public institutions in Washington State, and all institutions in Massachusetts have different requirements due to recent U.S. District Court actions. Please discuss with legal counsel. [HEERF litigation updates can be found here](#).

- Were students required to submit documentation of these expenses and/or their difficulty meeting them? (Y/N)
If so, please explain what types of documentation were required.
- Did you use any institutional administrative data (pre-existing data that did not come from a HEERF-specific application form) in determining the amount of funds awarded to students? ____ (Y/N). If yes,
 - Which of these student factors did you prioritize in the grant determination process? (*Mark all that apply*)
 - Enrollment intensity (i.e., full-time/part-time status, number of credits the student is taking, etc.) ____ (Y/N).
 - Location (i.e., branch campus) ____ (Y/N).
 - Pell Grant eligibility ____ (Y/N).
 - FAFSA data elements ____ (Y/N). If yes,
 - a. Which FAFSA data elements did you use?
 - i. FAFSA Family Income ____ (Y/N).
 - ii. Estimated Family Contribution ____ (Y/N).
 - iii. independent/dependent status ____ (Y/N).
 - On-campus/distance education status ____ (Y/N).
 - On-campus/off-campus living arrangements ____ (Y/N).
 - Academic level ____ (Y/N).
 - Other (Y/N). If yes, please specify _____
- Were any new academic requirements expected of students who received emergency funds? (Y/N).
 - If yes, please explain _____.
 - _____

6) How did your institution distribute the emergency financial aid grants to students?

- a) Checks ____ (Y/N).
- b) Electronic funds transfer /Direct deposit ____ (Y/N).
- c) Debit cards ____ (Y/N).
- d) Payment apps ____ (Y/N).
- e) Other (Y/N). If yes, please specify _____

- 7) Did your institution provide any instructions, directions, or guidance to students (e.g. FAQs) about the emergency financial aid grants upon disbursement? ____ (Y/N). If yes,
- a) <upload PDF/MS Word document instructions, directions, or guidance>
 - or
 - b) Provide any active URLs with instructions, directions, or guidance on how to use the grants
-
- (option to add more, as applicable)
- 8) Did your institution provide any details on what data would be collected in connection with emergency financial aid grants, how that data will be used, secured, managed, and shared by the institution or its partners, and the length of emergency financial aid data retention? If 'yes', then
- a) <upload PDF/MS Word document instructions, directions, or guidance>
 - or
 - b) Provide URL with instructions, directions, or guidance
- 9) Use the instructions noted in the Appendix I to complete the following table.

Emergency Financial Aid Grants Awarded to Students (direct grants and amounts reimbursed)								
		All HEERF Emergency Financial Aid Grant eligible students	Undergraduates ⁸				Graduates	
			Full-time students ⁹		Part-time students		Full-time students	Part-time students
			Pell grant recipient ¹⁰	Non-Pell grant recipient ¹¹	Pell grant recipient	Non-Pell grant recipient		
Number of Eligible Students	How many students were eligible to receive HEERF emergency grants made available under section 18004 of the CARES Act ¹² ?	<autofill: sum of #s in row>						
Number of HEERF Student Recipients – Emergency Grants to Students (unduplicated)	How many students received emergency financial aid grants provided under Section 18004 of the CARES Act? (unduplicated across all HEERF sections)	<autofill: sum of #s in row>						
HEERF Amount Disbursed (Section 18004(a)(1) Student Aid Portion)	What was the amount disbursed directly to students as Emergency Financial Aid Grants under Section 18004(a)(1) of HEERF?	<autofill: sum of #s in row>						
	What is the amount reimbursed ¹³ to your institution for Emergency Financial Aid Grants to students made prior to receiving your Section 18804(a)(1) HEERF grant but after March 27, 2020?	<autofill: sum of #s in row>						
HEERF Amount Disbursed (18004(a)(1) Institutional Portion)	What was the amount disbursed <i>directly</i> to students as Emergency Financial Aid Grants through the Institutional Portion of Section 18004(a)(1) of HEERF?	<autofill: sum of #s in row>						
	What was the amount of the Institutional Portion of Section 18004(a)(1) of HEERF that was used to recover the cost of reimbursing students for room, board, tuition, or fees? If funds were not used for this purpose, report \$0.	<autofill: sum of #s in row>						

⁸ For students in both undergraduate and graduate categories, classify as a graduate student.

⁹ For students who had multiple enrollment intensities use the enrollment status at the time of initial disbursement of the HEERF emergency grant (i.e. for students who received multiple disbursements, the status upon the first disbursement) to determine full-time status or part-time status.

¹⁰ Designate the student as a Pell grant recipient if the student was a Pell grant recipient at the time of initial disbursement of the HEERF emergency grant within the applicable reporting period.

¹¹ Includes non-FAFSA filers.

¹² For the purposes of this report, institutions may determine the number of eligible students based on the number of students for whom the institution has received an Institutional Student Information Record (ISIR) plus the number of students who completed an alternative application form developed by the institution for this purpose. The institution may then apply this number to its own methodological framework for disbursement of funds to produce a final total of eligible students at the institution. The institution is not asked to make assumptions about the potential eligibility of students for whom the institution has not received an ISIR or an alternative application.

¹³ See FAQ #3 [here](#).

<SKIP LOGIC for those who did not receive these funds> HEERF Amount Disbursed (Section 18004 (a)(2)-HBCUs, TCCUs, MSIs, SIP)	What was the amount disbursed <i>directly</i> to students as Emergency Financial Aid Grants through the HBCUs, TCCUs, MSIs, or SIP portion of the fund? If funds were not used for this purpose, report \$0.	<autofill: sum of #s in row>							
	What was the HBCUs, TCCUs, MSIs, or SIP portion amount used to recover the cost of reimbursing students for room, board, tuition, or fees? If funds were not used for this purpose, report \$0.	<autofill: sum of #s in row>							
<SKIP LOGIC for those who did not receive these funds> HEERF Amount Disbursed (Section 18004 (a)(3))	What was the amount disbursed <i>directly</i> to students as Emergency Financial Aid Grants through funds received through Section 18004(a)(3)? If funds were not used for this purpose, report \$0.	<autofill: sum of #s in row>							
	What was the amount received through Section 18004(a)(3) used to recover the cost of reimbursing students for room, board, tuition, or fees? If funds were not used for this purpose, report \$0.	<autofill: sum of #s in row>							
Minimum and maximum awards	Minimum combined (combined across HEERF funds) amount awarded to any student who received any HEERF funds and by student recipients	<autofill: min of #s in row>							
	Maximum combined (combined across HEERF funds) amount awarded to any student who received any HEERF funds and by student recipients	<autofill: max of #s in row>							
HEERF Amount of Grants Disbursed	What was the amount of grants disbursed to students through all HEERF funds?	<autofill: calculated from #s above>	<autofill: calculated from #s above >						
Average HEERF Amount Awarded	Among students who received HEERF emergency financial aid grants, what was the average award amount per student?	<autofill: calculated from #s above >							

10) Provide the total amount of HEERF funds expended on the categories provided. *(Please note that the CARES Act prohibits the use of funding for the provision of pre-enrollment recruitment activities; endowments; or capital outlays associated with facilities related to athletics, sectarian instruction, or religious worship. In addition, please note that this template is meant to serve as a guide, and therefore IHEs are not required to categorize amounts in every category listed but only those that IHEs found applicable to their unique circumstances. Lastly, reported numbers should be consistent with previously published quarterly funding reports (the sum of quarterly reports should equal the value of the annual report)).*

Category	Amount in (a)(1) institutional dollars	Amount in (a)(2) dollars, if applicable	Amount in (a)(3) dollars, if applicable	Explanatory Notes
Providing Emergency Financial Aid Grants under Section 18004(a)(1) of HEERF to students.				
Providing additional emergency financial aid grants to students. ¹⁴				
Providing reimbursements for tuition, housing, room and board, or other fee refunds.				
Providing tuition discounts.				
Covering the cost of providing additional technology hardware to students, such as laptops or tablets, or covering the added cost of technology fees.				
Providing or subsidizing the costs of high-speed internet to students or faculty to transition to an online environment.				
Subsidizing off-campus housing costs due to dormitory closures or decisions to limit housing to one student per room; subsidizing housing costs to reduce housing density; paying for hotels or other off-campus housing for students who need to be isolated; paying travel expenses for students who need to leave campus early due to coronavirus infections or campus interruptions.				
Subsidizing food service to reduce density in eating facilities, to provide pre-packaged meals, or to add hours to food service operations to accommodate social distancing.				
Costs related to operating additional class sections to enable social distancing, such as those for hiring more instructors and increasing campus hours of operations.				

¹⁴ To support any element of the cost of attendance (as defined under Section 472 of the Higher Education Act of 1965, as amended (HEA)) per Section 18004(c) of the CARES Act and the [Interim Final Rule](#) published in the *Federal Register* on June 17, 2020 (85 FR 36494). Community Colleges in California, all public institutions in Washington State, and all institutions in Massachusetts have different requirements due to recent U.S. District Court actions. [HEERF litigation updates can be found here.](#)

Category	Amount in (a)(1) institutional dollars	Amount in (a)(2) dollars, if applicable	Amount in (a)(3) dollars, if applicable	Explanatory Notes
Campus safety and operations. ¹⁵				
Purchasing, leasing, or renting additional instructional equipment and supplies (such as laboratory equipment or computers) to reduce the number of students sharing equipment or supplies during a single class period and to provide time for disinfection between uses.				
Replacing lost revenue due to reduced enrollment.				
Replacing lost revenue from non-tuition sources (i.e., cancelled ancillary events; disruption of food service, dorms, childcare or other facilities; cancellation of use of campus venues by other organizations, lost parking revenue, etc.). ¹⁶				
Purchasing faculty and staff training in online instruction; or paying additional funds to staff who are providing training in addition to their regular job responsibilities.				
Purchasing, leasing, or renting additional equipment or software to enable distance learning, or upgrading campus wi-fi access or extending open networks to parking lots or public spaces, etc.				
Other Uses of (a)(1) Institutional Portion funds. ¹⁷				

¹⁵ Including costs or expenses related to the disinfecting and cleaning of dorms and other campus facilities, purchases of personal protective equipment (PPE), purchases of cleaning supplies, adding personnel to increase the frequency of cleaning, the reconfiguration of facilities to promote social distancing, etc.

¹⁶ Including continuance of pay (salary and benefits) to workers who would otherwise support the work or activities of ancillary enterprises (e.g., bookstore workers, foodservice workers, venue staff, etc.).

¹⁷ Please post additional documentation as appropriate and briefly explain in the “Explanatory Notes” section. Please note that costs for Section 18004(a)(1) Institutional Portion funds may only be used “to cover any costs associated with significant changes to the delivery of instruction due to the coronavirus, so long as such costs do not include payment to contractors for the provision of pre-enrollment recruitment activities; endowments; or capital outlays associated with facilities related to athletics, sectarian instruction, or religious worship.”

Category	Amount in (a)(1) institutional dollars	Amount in (a)(2) dollars, if applicable	Amount in (a)(3) dollars, if applicable	Explanatory Notes
Other uses of (a)(2) or (a)(3) funds, if applicable. ¹⁸				
Annual Expenditures for each Program				
Total of Annual Expenditures				

11) Provide the number of students who ever received HEERF grant funds in the reporting period and their enrollment status at the end reporting period.

How many students received emergency financial aid grants through any of the HEERF funds?	How many of students who ever received HEERF Emergency Financial Aid Grants dropped out (withdrawal without a completion record or return to school since receiving funds)?	How many of the students who ever received HEERF Emergency Financial Aid Grants are still enrolled at your institution?	How many of the students who ever received HEERF Emergency Financial Aid Grants have completed their program of study at your institution?	Withdrawal rate for students who received HEERF Emergency Financial Aid Grants
< autofill from above>				<autofill: students who dropped out divided by total number of students who received funds>
How many students were eligible for (based on federal legislation) but did not receive emergency financial	How many of students who were eligible for (based on federal legislation) but did not receive HEERF Emergency Financial Aid Grants dropped out (withdrawal without a	How many of the students who were eligible for (based on federal legislation) but did not receive HEERF Emergency Financial Aid Grants are	How many of the students who were eligible for (based on federal legislation) but did not receive HEERF Emergency Financial Aid Grants have	Withdrawal rate for students who were eligible for (based on federal legislation) but did not receive HEERF Emergency Financial Aid Grants

¹⁸ Please post additional documentation as appropriate and briefly explain in the “Explanatory Notes” section. Please note that costs for Sections 18004(a)(2) and (a)(3) funds may only be used “to defray expenses, including lost revenue, reimbursement for expenses already incurred, technology costs associated with a transition to distance education, faculty and staff trainings, payroll incurred by institutions of higher education and for grants to students for any component of the student’s cost of attendance (as defined under section 472 of the HEA), including food, housing, course materials, technology, health care, and child care.”

aid grants through any of the HEERF funds?	completion record since receiving funds)?	still enrolled at your institution?	completed their program of study at your institution?	
<autofill from above>				<autofill: students who dropped out divided by total number of students who received funds>

12) Provide ¹⁹ the number of full-time equivalent (FTE) positions as of the listed reporting dates. *(The number of FTE positions includes all staff regardless of whether the position is funded by Federal, State, local, or other funds—including instructional and non-instructional staff and contractors—and equals the sum of the number of full-time positions plus the full-time equivalent of the number of part-time positions.)*

Number of employees as of:	Instructional Staff (FTE)	Non-instructional Staff (FTE)	Student Undergraduate Employees (FTE)	Student Graduate Employees (FTE)
September 30, 2018				
September 30, 2019				
March 13, 2020				
Last day of the reporting period				

Appendix I: Table instructions for question 8:

For your institution, provide the following:

- a. Count of students that were eligible to receive emergency financial grants under the HEERF.
- b. Unduplicated¹⁹ count of unique student recipients who received grants from any part of the HEERF.

¹⁹ For students who receive grants from different HEER funds, count them only once.

- c. The total amount disbursed from each of the following fund types for all students who received grants and grant recipient subgroups listed in the table below:
- 18004(a)(1): HEERF-Emergency Financial Aid Grants to Students.
 - Direct: amount directly disbursed to students as emergency financial aid grants. If funds were not used for this purpose, report \$0.
 - Reimbursement: amount of reimbursements to your institution for costs related to refunds made to students for room, board, tuition, or fees. If funds were not used for this purpose, report \$0.
 - 18004(a)(2): HEERF-Historically Black Colleges and Universities (HBCUs), Tribally Control Colleges and Universities (TCCUs), Minority Serving Institutions (MSIs), or Strengthening Institutions Programs (SIP).
 - Direct: amount directly disbursed to students. If funds were not used for this purpose, report \$0.
 - Reimbursement: amount of reimbursements to your institution for costs related to refunds made to students for housing, food, or other services your institution could no longer provide. If funds were not used for this purpose, report \$0.
 - 18004(a)(3): Funds for institutions through Fund for the Improvement of Postsecondary Education (FIPSE).
 - Direct: amount directly disbursed to students. If funds were not used for this purpose, report \$0.
 - Reimbursement: amount of reimbursements to your institution for costs related to refunds made to students for room, board, tuition, or fees. If funds were not used for this purpose, report \$0.
- d. For designation of enrollment intensity (i.e. full-time and part-time) use [IPEDS](#) definitions:
- i. Full-time students: Undergraduate: A student enrolled for 12 or more semester credits, or 12 or more quarter credits, or 24 or more contact hours a week each term. Graduate: A student enrolled for 9 or more semester credits, or 9 or more quarter credits, or a student involved in thesis or dissertation preparation that is considered full time by the institution. Doctor's degree - Professional practice - as defined by the institution.
 - ii. Part-time students: Undergraduate: A student enrolled for either less than 12 semester or quarter credits, or less than 24 contact hours a week each term. Graduate: A student enrolled for less than 9 semester or quarter credits
- e. Minimum combined (combined across HEERF funds) amount awarded to any student who received any HEERF funds and by student recipients in the subgroups listed in the table below.
- f. Maximum combined (combined across HEERF funds) amount awarded to any student who received any HEERF funds and by student recipients in the subgroups listed in the table below.

Conducted by:
U.S. Department of Education

OMB No. 18XX-XXXX Expires XX/XX/XXXX

Burden Statement

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. The valid OMB control number for this information collection is 18xx-xxxx. Public reporting burden for this collection of information is estimated to average 6 hours per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Under the PRA, participants are required to respond to this collection to obtain or retain a benefit. If you have any comments concerning the accuracy of the time estimate, suggestions for improving this individual collection, or if you have comments or concerns regarding the status of your individual form, please contact Brian Fu, US. Department of Education, 400 Maryland Avenue, SW, Washington, DC 20202.

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