



UNITED STATES DEPARTMENT OF EDUCATION

July 16, 2020

MEMORANDUM

TO: Lindsay Abate  
Office of Management and Budget Desk Officer

FROM: Hilary Malawer  
Deputy General Counsel

RE: Emergency request for Paperwork Reduction Act (PRA) approval

Pursuant to the Office of Management and Budget (OMB) procedures established at 5 CFR 1320, ED requests that the following collection of information, CARES Act 18004(a)(1) Reserve Fund Application, be processed in accordance with section 1320.13 Emergency Processing. ED has determined that this information must be collected prior to the expiration of time periods established under Part 1320, and that this information is essential to the ED's ability to effectively implement the CARES Act, Pub. L. No. 116-136 (March 27, 2020) and address the economic disruption posed by the Novel (new) Coronavirus ("2019-nCoV").

Section 18004(a)(1) of the CARES Act authorizes the Secretary of Education to allocate formula grant funds to participating institutions of higher educations (IHEs). Section 18004(c) of the CARES Act requires the IHEs to use no less than fifty percent of the funds received to provide emergency financial aid grants to students for expenses related to the disruption of campus operations due to coronavirus (including eligible expenses under a student's cost of attendance such as food, housing, course materials, technology, health care, and child care).

This collection includes application materials for those institutions not included in the original formula-based allocation table under 18004(a)(1) because the requisite Integrated Postsecondary Education Data System (IPEDS) enrollment data and Federal Student Aid (FSA) Pell data were not available.

If this emergency collection is not approved, the Department will be unable to issue these awards in a timely manner. These awards are particularly needed by IHEs that have experienced the greatest economic and educational disruptions caused by 2019-nCoV in order to support their recovery.

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Given the short timeframe, ED is unable to consult with the public prior to issuing the forms. However, ED has ample experience designing other similar forms in a way that is clear and minimizes burden. We estimate that the application will require 1.5 hours to complete.

The Department is requesting an emergency clearance from OMB by July 17 and will publish an emergency notice with a 60 day comment period for the regular collection, and an eventual 30 day comment period as required by 5 CFR 1320.8(d), to solicit public comments on the regular information collection.