

Higher Education Emergency Relief (HEER) Fund Recipient Reporting Data Collection Form			
Response to 30-Day Public Comments			
Document	Contact information	Comment	Response and Notes
ED-2020-SCC-0122-0138	Peter Goss peter.goss@pcc.edu Portland Community College	<p>I appreciate the scope of what the Department is trying to do, but similar to my comments on the initial draft, I think this collection really works only in the context of imagining a single distribution point and method.</p> <p>The picture quickly starts to become muddled (and thus yield unreliable and almost certainly misleading data) when trying to capture multiple disbursements, potentially using multiple methods, over a longer range of time.</p> <p>I can see there is guidance here intended to address this problem in the footnotes of #8, but from my view it merely bakes in certain problems. It's going to be a significant amount of labor to reproduce to fit this format. Moreover, I am skeptical the resulting output is going to reflect what we actually did, much less be comparable across other institutions.</p> <p>In broad strokes, in spring and summer quarters PCC funded 100% of eligible students; fall we funded roughly 2% of eligible students because the fund had been nearly expended. Since we did spend a non-zero amount we will have to include those fall counts in the total per the instructions, and the average counts will be skewed in a misleading fashion.</p> <p>#10 is complicated in myriad ways and is the item I have the most concern about how we can pull this data.</p> <p>For one, as a community college it's not atypical for students to have multiple declared simultaneous programs. If a student completed their associates spring but withdrew in fall from their certificate program, do we report that as both a completion and a withdrawal?</p> <p>Likewise, if the students received HEERF funds in spring, but not summer/fall and withdrew fall for financial reasons, it appears we report them as withdrawn even though that would suggest the CARES funds were not effective even when they likely were and additional funding may have helped that student persist.</p> <p>I do greatly appreciate that #9 appears to mirror the format of the current quarterly reports, and that it appears ED did make some tweaks to #5 and #6 to better reflect data from schools using multiple methods.</p>	<p>No change.</p> <p>ED appreciates the commenter's response to updates regarding item #9.</p> <p>On Item #10 and as noted in the response to comments on the 60-day notice: ED acknowledges that institutions may choose to make HEERF Emergency Grant disbursements at different times. The institution should designate the students' Pell or enrollment status based their status at time of the first HEERF Emergency Grant disbursement.</p>
ED-2020-SCC-0122-0139	n/a	Not relevant	No response necessary
ED-2020-SCC-0122-0140	n/a	Not relevant	No response necessary
ED-2020-SCC-0122-0141	Richard Cardamone rncardam@hacc.edu HACC	Harrisburg Area Community College has reviewed the annual collection of data pertaining to the uses of funds under the Higher Education Emergency Education Relief Fund (HEER Fund) issued by the US Department of Education, including the template to be used by respondents. The College has evaluated the process to determine if the information requested is necessary; if the collection of such data would enhance the quality, utility and clarity of information being collected; and if the information can be gathered with minimum burden. Based on that review, the College does not have any edits or	No response necessary

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ED-2020-SCC-0122-0142	Brostrom@ucop.edu University of California	<p>Item 8 Table, Page 5 'HEERF Amount Disbursed (18004(a)(1) Institutional Portion) Question: "What was the amount of the Institutional Portion of HEERF that was used to recover the cost of reimbursing students for room, board, tuition, or fees?"</p> <p>Comment: The table requires reporting on Pell grant / Non-Pell grant recipients for both the student aid portion and the institutional portion. The HEERF institutional funds were used to reimburse for losses at the institutional level. According to ED guidance, the institutional funds are eligible for use to supplement emergency grants to all students. However, this table requires reporting on the institutional funds that are used to reimburse the institution for housing and dining refunds be parsed to fit within the same reporting structure as the emergency grants (UG Pell/non-Pell). Is the intent of reporting in this manner to limit the use of institutional funds to reimburse refunds provided to only Title 4 or Pell eligible students? The University has a concern that the table implies certain limitations on the use of the funding - after the refunds have already been issued nearly 8 months ago - when the initial guidelines that were provided were far more flexible in general.</p>	No change. ED does not intend to limit the use of HEERF (a)(1) Institutional Portion funds for reimbursements to Pell-eligible students. Funds may be used to reimburse Pell grant recipients and/or non-Pell grant recipients and should be reported in the appropriate columns for each category in the table in question 8.
ED-2020-SCC-0122-0143	Foster's Cosmetology and Barber College	Foster's Cosmetology and Barber College of Ripley, MS has reviewed the Annual Report Data Collection System Draft Document and the requirements set forth by the Department of Education. Our administrative team will work diligently to complete everything in a timely manner. If there are any questions or concerns, we will reach out to the appropriate party until everything is resolved.	No response necessary
ED-2020-SCC-0122-0144	Mary Jean Sullivan Hollins Collee corrissmj@hollins.edu	I'm a financial aid administrator at a small liberal arts university with a high percentage of Pell recipients. For question # 3 of the proposed data collection form, my university started out with an application process. Then, after we made two groups of emergency fund disbursements, we still had funds leftover. So, we identified students with high-need who should have applied but didn't (including unemployed students and/or high-risk students, such as homeless students and orphans) and offered them funds. However, this form assumes that only one method of determination was used. It might be helpful to not make this question so fixed/static. I suppose I'd pick the option for "we used an application" but that wouldn't give you the full story. You know what I mean? As time went on, the application was helpful in the beginning but we needed to use another strategy to assist some of our neediest students who wouldn't speak up.	No change. The data collection instrument already allows grantees to report other methods of determination.
ED-2020-SCC-0122-0045	Post-Sec Data Mamie Voight, senior vice president of research and policy at the Institution for Higher Education Policy (mvoight@ihop.org or 202-587-4967).	<p>Maintain and expand data disaggregation.</p> <p>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.</p>	No change. The only new comment was about the question on emergency financial aid to students. This comment is covered by the question which asks institutions for their "instructions, directions, or guidance" on disbursement/eligibility for emergency student financial aid grants.

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		<p>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).</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>	

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		<p>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.</p> <p>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.</p> <p>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.</p>	
ED-2020-SCC-0122-0046	Anonymous	Not relevant.	No response necessary