

**HEERF Annual Data Collection 30-day Comment Responses**

Summarizing Comment	Applicable questions	Applicable comments	Response
<p>The proposed changes are overly burdensome. Institutions may not have the capacity to report on all the items especially in light of other pandemic - related priorities. Particularly problematic data elements include disaggregation by student subgroups, retrospective looking data elements, reporting on students who do not receive HEERF, integration of data from multiple sources, and competing state and federal reporting deadlines. Granular reporting on student subgroups also requires privacy perturbation.</p> <p>There are other instances where student demographic data does not exist. For instance, institutions indicated that they collect minimal demographic information from certain student populations, such as non-degree students.</p> <p>ED's request for significant disaggregation of data far outsteps the bounds of what is required to ensure institutional compliance with the law. At minimum, if ED does not entirely remove the disaggregation and comparison questions, it should make responses to those questions optional.</p> <p>Withdraw this IC and leave the existing IC in place while convening stakeholders with knowledge of institutional operations and usage of HEERF funds to develop a more comprehensive and achievable reporting method that meets our shared goals for understanding how institutional funds were used and how students with the greatest need were aided.</p>	<p>Multiple</p>	<p>Ellen Olsen Kent Sorenson Jennifer Schultz Anonymous (2) Josh Welker COGR</p>	<p>No change. The Department continues to see the additional disaggregation as important for transparency and accountability, particularly as they relate to 1) equitable distribution of emergency relief funding for each institution 2) developing lessons learned for current and future policies that respond to national emergencies. Further, the Department sees the importance of transparency and accountability at the institution level and a national sample would not provide this level of granularity. As a reminder, many institutions can use their HEERF grant funds for administrative costs such as annual reporting. To ensure that all the students could be categorized for questions that rely on IPEDS demographic categories, an additional category was added for students not classified by IPEDS (e.g. students that were not enrolled for credit in courses that could lead to an award). Lastly, for many of the questions requiring disaggregation, grantees will have more time to link their data systems and prepare data. For the second annual report covering January 1, 2021-December 31, 2021, institutions have the option of taking more time to submit answers to questions marked with an asterisk. Institutions can submit answers to questions marked with an asterisk in early 2022 as part of the second annual report (in alignment with the table above) OR in early 2023 as part of the third annual report. Starting with the third annual report, institutions need to provide answers to all questions including those marked with an asterisk per the reporting schedule described on the form.</p>

<p>Instead of requiring the proposed data disaggregation from all institutions, we suggest the Department of Education gather this data through a grant-funded partnership with a representative sample of postsecondary institutions.</p> <p>This is a retroactive data collection request. Retroactive requests are burdensome, potentially impractical (or even impossible) to obtain--and may be inappropriate. When this is the case, data collection requests either should be deleted from the collection form or significantly revised to avoid an administratively burdensome new requirement. Some of these data collection requests--marked with an asterisk (*)--are burdensome and it is not clear that they are statutorily required. We urge the Department to simplify the annual report by deleting selected data requests. Where there are opportunities to simplify the data collection form (including the Department data collection web portal) we urge the Department to do so.</p>			
<p>Preserving disaggregation along race/ethnicity and Pell receipt is critical to understanding disparities in educational outcomes associated with the pandemic and the impact of federal and institutional responses. 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. Preserving disaggregation by gender and age can also help us better understand the challenges faced by today's students throughout</p>		PostsecData	No change.

the pandemic and assess how HEERF funding was able to help support their retention and success. While disaggregated data reporting requirements will require effort, we agree with ED's statement that these requirements are necessary for transparency.			
If the intent of the "Students not categorized in IPEDS" data field is to allow institutions to bypass this data collection request in cases where it is impractical or impossible to comply, COGR requests that this clearly be described in the instructions for completing these sections of the annual report.	Multiple	COGR	Change. The form has been updated with instructions on which students should be categorized students as "Students not categorized in IPEDS"
Lost revenue is not being tracked based on prior guidance provided by the Department. In addition, lost revenue funds may not necessarily be expended in the same reporting period.	9c	Ellen Olson Kent Sorenson Anonymous (3)	No change. To maintain a metric for accountability on lost revenue expenditures and maintain consistency with prior guidance, the Department has reframed the question on lost revenue to focus on how lost revenue expenditures were derived using categories aligned with the March 19, 2021 Lost Revenue FAQ Document.
COGR was concerned with the original reporting format for lost revenue. The revised format eliminates precise identification to financial statement categories and instead focuses on estimates to broad functional areas. COGR appreciates the Department's responsiveness to our original concern.	9c	COGR	No change.
In regards to the instructions which state "Failure to meet the HEERF reporting requirements is a violation of the grantee's certification and agreement and could lead to adverse action." Our members, and the higher education community at-large, are focused on thorough, accurate, and transparent reporting of HEERF activity. This addition could be perceived as an ominous threat, which could then translate into inappropriate audit activity and/or unwarranted "adverse actions." This new instruction that has been added to the form should be deleted.	Instructions	COGR	No change. While the sentence remains in the form, the Department juxtaposed more context to the instructions to further highlight the importance and rationale of annual reporting. In addition, compliance with annual reporting is consistent with many Department grant programs in general.
We also appreciate ED's decision to require reporting on whether an institution received		PostsecData	No change.

approval from their accreditors for the transition to online education.			
PostsecData also continues to support the use of comparison groups to assess the impact of emergency financial aid on retention and completion rates and urges ED to maintain reporting of retention rate data separately for students who receive HEERF funding and non-HEERF recipients.		PostsecData	No change. To the extent that students who receive and do not receive emergency financial aid may be systematically different, there are limitations to comparisons across the two groups. Simplifying the retention rate measure reduces burden and still provides relevant information on the overall retention rate of the institution.