



November 27, 2020

Director of the Strategic Collections and Clearance Governance and Strategy Division
U.S. Department of Education
400 Maryland Ave. SW
LBJ Room 6W208D
Washington, DC 20202-8240

To whom it may concern:

On behalf of the National Association of Student Financial Aid Administrators (NASFAA) and our 3,000 member institutions, we respectfully submit to the U.S. Department of Education (ED) our comments on the proposed Quarterly Budget and Expenditure Reporting (QBER) under CARES Act Sections 18004(a)(1) Institutional Portion, 18004(a)(2), and 18004(a)(3), Docket No. ED-2020-SCC-0154.

NASFAA represents nearly 20,000 financial aid professionals who serve 16 million students each year at colleges and universities in all sectors throughout the country. NASFAA member institutions serve nine out of every ten undergraduates in the U.S.

With respect to ED's directed question about the relationship between the annual data collection instrument proposed on July 29, 2020 and this quarterly report, and where requested data may be duplicative: The QBER questions exactly match Question 9 of the annual data collection. We recommend that ED remove Question 9 from the annual data collection entirely, or use the quarterly data submissions to auto-populate annual figures in Question 9 of the annual data collection to avoid the burden of duplicative reporting.

We appreciate the inclusion of a checkbox for institutions to indicate that their quarterly submission is their final report. Once an institution has expended all of their HEERF dollars and has reported on how those dollars were spent, there is no longer a need to burden institutions with subsequent data collections.

We also offer recommendations on several QBER questions:

- **Providing reimbursements for tuition, housing, room and board, or other fee refunds:** In the first table row, ED asks for the dollar amount expended on HEERF emergency grants to students for each HEER funding source in CARES Act Section 18004(a). ED includes Footnote 1 to clarify that this field includes grants to students that were intended, "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)."

We appreciate the addition of the reference to CARES Act Section 18004(c), which details the allowed use of funds for all three funding sources within Section 18004(a). However, the

continued reference to funds being used “to support any element of the Cost of Attendance” is confusing because funds from Section 18004(a)(1) do not require such use. As such, institutions may have used HEERF direct grants from (a)(1) to students to cover non-COA expenses, which was an allowed use for (a)(1) funds. We recommend removing the COA reference. If ED chooses not to remove this reference, we note that it could be impossible for institutions to differentiate whether HEERF direct grants to students from section 18004(a)(1) went toward eligible COA expenses or other expenses not eligible for inclusion in the COA because there is no requirement to do so.

The reference to the June 17 Interim Final Rule (IFR) in the same footnote is also confusing. The IFR only addresses the definition of student—for the purpose of determining student eligibility for the grants—and not the use of funds. Reference to the IFR does not seem necessary. We suggest revising the footnote to refer only to CARES Act Section 18004(c).

The final question in table Row 1 asks for “Other uses of funds” and requires institutions to provide documentation. We question why institutions are required to provide documentation for this question when documentation is not required for other expenses, and also question what type of documentation ED is seeking. Requiring institutions to provide documentation will dramatically increase burden, and it is unclear how documentation will aid in a post-analysis evaluation. At the very least, ED should be clear about the type(s) of documentation they will consider acceptable.

- **Total of Quarterly Expenditures:** We suggest that ED autofill a calculated amount here as it does with several fields on the proposed annual data collection to ease burden and reduce the possibility of calculation errors.

We appreciate the opportunity to comment on this proposed data collection. If you have any questions regarding these comments, please contact me or NASFAA Policy Analyst Jill Desjean at desjeanj@nasfaa.org.

Sincerely,



Justin Draeger, President & CEO