



March 14, 2022

PRA Coordinator 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 Higher Education Emergency Relief Fund (HEERF) Quarterly Budget and Expenditure Reporting (Docket No.: ED-2022-SCC-0018.)

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.

The Department of Education's (ED) latest changes to the HEERF reporting requirements add confusion and burden to an already confusing and burdensome reporting process that has been modified several times in the past two years. ED does not make a compelling case for the need to duplicate a significant number of questions from the annual data collection to the quarterly report. Further, ED's request for emergency Office of Management and Budget (OMB) review only exacerbates confusion and burden by rushing the launch of this new form without regard for its implications.

The new quarterly form appears to have been developed hastily and with a lack of intention. The quarterly and annual forms were developed for different purposes. Since its creation in 2020, the quarterly form has always recorded only institutional share expenditures whereas the annual report captures both student share and institutional share expenditures. In the revised quarterly

report, ED copies several annual report questions into the quarterly report, including questions about student share expenditures, but fails to update the rest of the form to reflect that.

For instance, ED has not updated the very first line of the form—its heading—which still reads, “Quarterly Budget and Expenditure Reporting for HEERF I, II, and III (a)(1) Institutional Portion, (a)(2), and (a)(3), if applicable,” with no mention of student share funds. ED has also failed to update the form’s instructions, again indicating only institutional share funds in the instructions for completing charts, when the form itself now asks for student share expenditures. As a result, institutions will be unsure how to accurately complete the new quarterly report.

It is not clear why ED needs to increase institutional quarterly reporting burden by nearly double at this late date and with such short notice. Institutions will be gathering data for their year 2 annual reports during the same timeframe as this quarterly report. They will be devoting time not only to data collections and reporting itself, but also to understanding the reports and instructions given that both reports have undergone significant revisions since the last time institutions completed them. With this revised data collection, institutions will now be spending sixty-two hours¹ per year on HEERF reporting.

ED’s rationale for emergency PRA approval does not appear relevant. The Department states, “If we are unable to implement the changes in time for this reporting deadline, the Department will be lacking critical information needed to monitor and provide technical assistance to HEERF grantees.” However, ED has been administering the program for two years without this information and, further, will have much of this information in May when institutions submit their second year’s annual reports. Many institutions are submitting their final report this quarter and many still will have only one final quarter of reporting remaining. Any critical information ED expects to glean from one or two quarterly reports as schools wind down their HEERF spending surely cannot justify the burden associated with the changes it proposes. This data may have been helpful if it had been collected from the beginning of the HEERF program, but will serve little purpose at this late stage.

We request that ED keep the quarterly HEERF reporting form limited to institutional share expenditures from the chart on the existing quarterly form. If ED continues with the expanded quarterly data collection, we ask that ED make the following changes to help institutions understand and complete the request:

¹ Per ED’s estimates of 40 hours for annual report completion + (5 hours per QBER x 4 submissions per year) + (.5 hours for quarterly students share website reporting x 4 reports per year)

- Update the form title and instructions to accurately reflect the scope of the quarterly form to include student share expenditures
- Make clear on the form whether and how institutions that have fully spent their institutional share should complete the quarterly reporting form.
- Remove reference to skip logic, which is copied from the annual form but does not apply to the quarterly form given that the quarterly form will not be completed online.

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

Regards,

A handwritten signature in black ink, appearing to read 'Justin Draeger', with a stylized flourish at the end.

Justin Draeger, President & CEO