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The Department of Education's request for disaggregation of data will impose an unreasonable amount of burden, in both hours and dollars. This significant investment of time and money comes at a time that we, as an institution, are still dealing with the financial fall out of the Covid-19 national emergency.

Given that the HEERF funds served as a one-time round of funding and the fact that there were no requirements provided for how institutions spend HEERF grants with respect to the demographic categories ED specifies in the data collection, nor HEERF grant recipient outcomes, the disaggregated and comparison data ED is requesting creates a substantial burden that may not be feasible to collect.

I appreciate the opportunity to comment on this proposed data collection.