

Kate Mullan

PRA Coordinator, Strategic Collections and Clearance, Governance and Strategy Division, Office of Chief Data Officer, Office of Planning, Evaluation and Policy Development.

U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

November 8, 2021

Re: Docket No. ED-2021-SCC-0093

To Whom It May Concern:

This letter is submitted on behalf of the 15 undersigned members and partners of the Postsecondary Data Collaborative (PostsecData) in response to the request for comment on changes to the Higher Education Emergency Relief Fund (HEERF) I, II, & III Data Collection Form. PostsecData is a nonpartisan coalition of organizations committed to the use of high-quality postsecondary data to improve student success and advance educational equity. This letter reaffirms our support for data reporting under HEERF that reflects the disproportionate impact of the pandemic on students of color and those from low-income backgrounds. This data will help stakeholders better understand the impact of the pandemic and the emergency financial assistance provided through HEERF funds.

HEERF dollars have provided critical support to both postsecondary institutions and the students they serve throughout the COVID-19 pandemic. For this reason, PostsecData appreciates the Department of Education's (ED) thoughtful approach to data collection at institutions receiving funding through HEERF. The required data collection will compile important information about the extent to which HEERF has promoted persistence among students from communities that have been most seriously harmed by the health and economic destruction COVID-19 has wrought, and how institutions used HEERF funds to support students in crisis and manage operational strain.

Specifically, the proposed collection would gather data on the number and dollar amount of emergency financial aid grants awarded to students overall, as well as by race/ethnicity, gender, Pell status, and age group. 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 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.

PostsecData thanks the Department for incorporating many of our previous recommendations into the HEERF annual data collection form. Specifically, the Department has provided useful clarifying remarks on the availability of data in CSV format. We also appreciate ED's decision to require reporting on whether an institution received 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 continues to advocate for the Department to calculate and publish summary statistics, such as average spending and breakdowns by institution type and region, to provide insights into trends in spending by institution-type and over time and assist advocates in easily accessing information regarding the role of HEERF in addressing longstanding inequities in higher education access.

The undersigned members and partners of PostsecData encourage ED to adopt these recommendations to provide transparency to students, researchers, and policymakers around institutional spending under HEERF and to inform future efforts to support students in times of crisis. If you have any questions, please contact Mamie Voight, interim president at the Institute for Higher Education Policy (mvoight@ihp.org or 202-587-4967).

Sincerely,

AccuRounds

Advance CTE

Association of College Unions International

Center for American Progress

Commission on Accreditation of Healthcare Management Education

HCM Strategists

Higher Learning Advocates

Institute for Higher Education Policy

National College Attainment Network

National Skills Coalition

NCHEMS

NIRSA: Leaders in Collegiate Recreation

The Education Trust

Third Way

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