

Author Full Name : Anonymous**Received Date :** 05/13/2022 12:57 AM**Comments Received :**

Requesting section 2b for every quarterly report places great burden on institutions that serve low income populations and have limited operational budgets and staffing., particularly if the information is requested for the three-month reporting period. For example, HEERF 1st Quarter Report covers the period of Jan 1 thru March 30, with a due date of April 10th. College final reconciliations for each month close on the 7th of the following month. As it is, IHEs are hurried in the categorizing of expenditures in HEERF categories within the time frame after the reconciliation of the last month of the reporting cycle (3 days). Many times the reporting deadline falls on a weekend or holiday, and some reporting months have holidays which result in institutions losing one or two days in the reporting cycle, and IHEs must also post reports on institutional websites by the 10th of month the report is due, which requires completion by end of workday on Friday on months in which the 10th falls on a weekend. To add section 2b as a requirement for HEERF quarterly reports would add additional strain on the limited personnel resources of IHEs, particularly if the information to be reported covers the span of the entire reporting period. The IHEs must wait until after the last day of the last month of the reporting quarter to begin gathering and analyzing the data for student enrolled during that time frame, and then all students awarded HEERF emergency grants during that quarter.

With the current reporting form, it would be helpful for the USDOE to allow grantees through the 30th of the reporting month, or at least through the 15th of the reporting month, to submit and post reports.

To add the additional requirement each quarter to complete section 2b for the reporting period, would add much strain and risk the increase in error in quarter reports by IHEs. If section 2b is to be added to quarter reports, the Department of Education should extend the reporting deadline to 45 days, and at minimum 30 days, after the last day of the reporting period. This would provide under-resourced IHEs sufficient time not only to be able to complete the last month reconciliation without duress, but also gather the data required in section 2b for the reporting period with sufficient time and allow for accuracy in reporting.