



June 9, 2021

James Kvaal, Under Secretary-Designate  
Julie Morgan, Delegated the Duties of Under Secretary  
Michelle Asha Cooper, Acting Assistant Secretary, Office of Postsecondary Education  
Jordan Matsudaira, Deputy Under Secretary, Office of the Under Secretary  
Melanie Muenzer, Chief of Staff, Office of the Under Secretary  
Nick Lee, Deputy Assistant Secretary, Office of Planning, Evaluation, and Policy Development  
Ben Miller, Senior Advisor to the Chief of Staff  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, D.C. 20202

Dear Department of Education Staff:

This letter is submitted on behalf of the 20 undersigned members and partners of the Postsecondary Data Collaborative (PostsecData) to call for transparent, accessible publication of the information institutions are required to report to the Department of Education annually and quarterly under the Higher Education Emergency Relief Fund (HEERF). PostsecData is a nonpartisan coalition of organizations committed to the use of high-quality postsecondary data to improve student success and advance educational equity.

Collecting and distributing reliable and timely information on students' educational experiences in the wake of the COVID-19 pandemic is crucial. 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 how institutions used HEERF funds to support students in crisis and manage operational strain. This collection will include data on the number and dollar amount of emergency financial aid grants awarded to Pell Grant recipients and non-Pell recipients, the institutional expenditures supported by HEERF, completion and withdrawal rates of students receiving HEERF emergency grants, and staffing at individual colleges and universities receiving HEERF dollars.

In addition, 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. For instance, while immediate college enrollment among high school graduates fell by an unprecedented 7 percent after the onset of the pandemic, college enrollment of high school graduates from high-poverty high schools and high schools with high proportions of students of color fell even more—by 11 percent and 9 percent, respectively.<sup>i</sup> The disparate impact of COVID-19 extends throughout students' higher education experiences, and HEERF dollars have the potential to remedy these inequities and make college enrollment and persistence possible for the most impacted and marginalized students.

Transparency is essential, especially in times of emergency. Because the data generated through the HEERF annual and quarterly reporting provide critical information and are unlikely to be available elsewhere, it is crucial that ED embrace transparency by 1) publishing institution-level data in a user-friendly, machine-readable format and 2) calculating and publishing summary statistics to provide insights on trends in spending by institution-type and over time. Publishing these data is critical to ensuring that students, families, policymakers, and taxpayers have access to relevant and comprehensive data to examine how institutions spent these funds and to inform future appropriations into these or other funds.

### **Publish institution-level data in a user-friendly, machine-readable format.**

PostsecData strongly recommends that ED make institution-level data generated through annual and quarterly HEERF collections publicly available in an accessible, user-friendly and machine-readable format. For instance, publishing quarterly reports on HEERF spending allocations through the Office of Federal Student Aid (FSA) Data Center website in a downloadable Excel or CSV file would maximize the utility of the information collected and be consistent with existing ED transparency efforts. Prioritizing data usability allows researchers, institutions, policymakers, and advocates to analyze the data to better understand the use and impact of the dollars—understanding that is critical to informing action to address inequities.

Specifically, ED should publish institution-level data on each of the funds created through HEERF, including student and institutional portions, specific funds for minority-serving institutions, and competitive and formula supplemental grants.<sup>ii</sup> These institution-level files should also include IPEDS and/or OPEID identifiers to enable analysis of HEERF spending across various institutional characteristics.<sup>iii</sup>

### **Calculate and publish summary statistics to provide insights into trends in spending by institution-type and over time.**

While providing institution-level data will enable researchers and advocates to conduct analyses of their own, ED should supplement this information by calculating and publishing high-level summary statistics highlighting spending across different types of institutions and over time. Simple calculations such as the average spending and percentage of total spending in each category by level and control, minority-serving institution status, and geographic region or state, would be valuable for policymakers, institutional leaders, and advocates seeking information about HEERF spending to drive improvement efforts that aim to reverse the deepening racial and socioeconomic inequities the pandemic has caused. In addition, publication of aggregate data on emergency spending grants to students disaggregated by Pell status and enrollment intensity would improve the higher education community's understanding of the allocation of emergency financial support provided to students from federal sources. To facilitate ease of use, ED should allow for users to download data from multiple files simultaneously (e.g., multiple states in a single download<sup>iv</sup>) and provide separate breakdowns of HEERF funds by CARES (HEERF I), CRRSA (HEERF II), and ARP (HEERF III).

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. If you have any questions, please contact Mamie Voight, interim president at the Institute for Higher Education Policy ([mvoight@ihep.org](mailto:mvoight@ihep.org) or 202-587-4967).

Sincerely,

AccuRounds

Achieve Atlanta

Advance CTE

American Association of University Women (AAUW)

AMT - The Association For Manufacturing Technology

Center for American Progress

Corporation for a Skilled Workforce

Data Quality Campaign

Education Reform Now

George Washington Institute of Public Policy at GWU

Higher Learning Advocates

Institute for Higher Education Policy (IHEP)

National Association for College Admission Counseling

NCHEMS

New America Higher Education Program

Nexus Research and Policy Center

Postsecondary Analytics

Public Insight Data Corporation

The Institute for College Access and Success

Third Way

uAspire

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<sup>i</sup> National Student Clearinghouse. (2020, December 10). High school benchmarks 2020 with a COVID-19 special analysis. [https://nscresearchcenter.org/wp-content/uploads/2020\\_HSBenchmarksReport.pdf](https://nscresearchcenter.org/wp-content/uploads/2020_HSBenchmarksReport.pdf)

<sup>ii</sup> The specific programs vary across the three rounds of HEERF funding, for a full list of programs including in HEERF1 (CARES Act) please see: <https://www2.ed.gov/about/offices/list/ope/caresact.html> For a full list of programs included in HEERF II (CRRSAA) please see: <https://www2.ed.gov/about/offices/list/ope/crrsaa.html> For a full list of programs included in HEERF III please see: <https://www2.ed.gov/about/offices/list/ope/arp.html>

<sup>iii</sup> Anthony Jr, M. (2021). The state of higher education spending from the CARES act. <https://www.americanprogress.org/issues/education-postsecondary/news/2021/01/29/495178/state-higher-education-spending-cares-act/>

<sup>iv</sup> Ibid.