



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

May 12, 2020

Dear Secretary DeVos:

This letter is submitted on behalf of the 19 undersigned members and partners of the Postsecondary Data Collaborative (PostsecData). PostsecData is comprised of organizations committed to the use of high-quality postsecondary data to improve student success and advance educational equity.

In light of the unprecedented circumstances facing higher education, with the full impact of coronavirus disease 2019 (COVID-19) unknown, we appreciate the emergency funding to postsecondary institutions and students provided by Congress through the March 2020 Coronavirus Aid, Relief, and Economic Security (CARES) Act and the steps the Department has taken to disburse the funding. We appreciate that you have already taken efforts to encourage transparency by requiring public reporting of institutional spending, and as the Department of Education (ED) considers guidance for reporting to the Secretary for the receipt of these funds, we encourage you to consider the following principles:

- 1. Require consistent and disaggregated indicators that illustrate how institutions use the emergency aid and provide clear definitions for the indicators.**

To maximize the usability of these data reports, ED should define common and consistent indicators and issue clear guidance on reporting standards. Also, the data on student receipt of aid should be disaggregated by student characteristics to understand who benefits from the federal CARES investment. This disaggregation will be key in allowing the Department to evaluate the extent to which institutions followed the Secretary's recommendation to direct aid towards students with financial need.

ED's reporting requirements should answer questions about which students receive funds (student awards), how student awards are determined (process measures), and how institutions use their allocation (institution awards). We recommend the following measures to be included in required institutional reporting:

**Table 1: Recommended data collection for CARES**

| <b>Student Awards: How many students received aid, and how much?</b> | <b>Categories</b> | <b>Disaggregation</b>                      |
|--|-------------------|--|
| Estimated number of CARES-eligible students                          | Student headcount | Student characteristics (enumerated below) |

|  |  |                         |
|--|--|-------------------------|
| Number of students who received emergency aid through CARES  | Student headcount  | Student characteristics |
| Total CARES aid awarded to students                          | Dollars  | Student characteristics |
| Median per-student CARES award amount                        | Dollars  | Student characteristics |
| <b>Process Measures: How were student awards determined?</b> | <b>Categories</b>  | <b>Disaggregation</b>   |
| Method(s) used to allocate CARES awards to students          | <p>CARES awards were prioritized (check all that apply):</p> <ul style="list-style-type: none"> <li>● For Pell Grant recipients only</li> <li>● For Pell Grant recipients first, but then awarded to non-Pell recipients</li> <li>● Based on previously calculated EFC or unmet need</li> <li>● Based on re-calculated EFC or unmet need</li> <li>● Based on student appeal in written application for CARES funds</li> <li>● Based on student or parent conversation about CARES funds with financial aid officer or other administrator</li> <li>● Based on students' prior receipt of non-need-based aid</li> <li>● For full-time students</li> <li>● For part-time students</li> <li>● For student parents</li> <li>● For dependent students</li> <li>● For independent students</li> <li>● For purchase of technology by the institution</li> <li>● Other (provide description)<br/>ED should analyze these "Other" submissions to determine if additional categories should be added in future iterations of the data collection.</li> </ul> | N/A                     |

|  |   |                       |
|--|---|-----------------------|
| Instructions or guidance provided to students receiving funds    | <ul style="list-style-type: none"> <li>● Yes, guidance issued <ul style="list-style-type: none"> <li>○ Institution should include a link to guidance for students on their website.</li> </ul> </li> <li>● No, no guidance issued</li> </ul>  | N/A                   |
| Student requirements to receive funds                            | <p>Check all that apply:</p> <ul style="list-style-type: none"> <li>● Student must complete additional form</li> <li>● Student must contact the financial aid office to request funds</li> <li>● No student action because aid is automatically disbursed via another method</li> </ul>   | N/A                   |
| Method for disbursing aid  | <ul style="list-style-type: none"> <li>● Direct deposit</li> <li>● Check</li> <li>● Debit card</li> <li>● Credit to student account</li> <li>● Other (provide description)</li> </ul>   | N/A                   |
| <b>Institution Awards: How did institutions spend the funds?</b> | <b>Categories</b>   | <b>Disaggregation</b> |
| Institutional expenditures                                       | <p>Dollars spent in the following categories:</p> <ul style="list-style-type: none"> <li>● Student financial aid</li> <li>● Student support services</li> <li>● Faculty and staff salaries</li> <li>● Faculty and staff training and development</li> <li>● Instructional technology development</li> <li>● Technology infrastructure to transition to distance learning (e.g., purchasing web conferencing accounts)</li> <li>● Subcontract or written arrangement to support transition to distance learning</li> <li>● Program development</li> <li>● Marketing and communications</li> <li>● Other (provide description)</li> </ul> | N/A                   |

Aggregate measures for each of the student award data elements could mask inequities that exist in disbursement of aid. Disaggregated results can inform policies related to this or future crises, so we strongly recommend that the student award measures be disaggregated at a minimum by these student characteristics, prioritizing those in italics:

- *Pell Grant receipt in current award year*
- *Undergraduate or Graduate student*
- *Race/ethnicity (IPEDS standard)*
- Enrollment intensity (full or part time) and attendance status (first-time or transfer)
- Age (IPEDS standard)
- Gender (IPEDS standard)
- Dependency status in current award year

These measures are critical to understanding how institutions prioritized fund disbursement to students and across institutional functions. Because data is collected in a variety of ways across federal, state, and voluntary initiatives, the guidance should outline the data elements, calculation, and alignment with any other existing reporting requirements. Wherever possible, ED should align definitions with existing federal data collections to minimize institutional reporting burden. To do this, ED should use the measures in Table 1 as a guidepost. When these data are made publicly available, ED should ensure that student privacy is protected by aggregating within student categories so that individual students are not identifiable.

## **2. Provide guidance on and enforce standardized reporting mechanisms across institutions.**

Transparency is most effective when data are consistent, accessible, and comparable, so ED should clearly outline the mechanism for reporting to the Department, including templates and instructions for calculation and collection frequency while limiting qualitative or open-ended responses that will be difficult to categorize or compare. The Department should consider leveraging their existing reporting infrastructure to collect and disseminate this information to maximize data quality and streamline institutional effort. For example:

- ED could create an ad hoc survey through the Integrated Postsecondary Education Data System (the IPEDS), with which colleges and universities already are familiar. The National Center for Education Statistics (NCES), which administers IPEDS, is well-suited to collect and report this information.
- ED could require institutions to submit a flag for CARES aid recipients, along with the amount of each student's CARES award to the National Student Loan Data System (NSLDS) in the Office of Federal Student Aid (FSA) and make aggregate, institution-level statistics available through the FSA Data Center.

Both options allow for regular reporting at the initial 30-day and subsequent 45-day periods, as required by the Secretary in institutions' signed certifications and agreements.

It also is critical that ED make these data publicly available in an accessible, user-friendly format. We applaud ED's recent guidance that institutions should make data on emergency aid available in a prominent place on institutional websites and further encourage ED to report these data in a comprehensive and comparable way on its own website, leveraging the existing IPEDS Data Center and/or FSA Data Center infrastructure. Publishing all of the measures noted above on ED's website is critical to ensuring that students, families, policymakers, and taxpayers have access to relevant and comprehensive data to examine how the money was spent and to inform future appropriations into these or other funds. With multiple entities engaged in oversight of these and other pandemic-related funds, collecting and reporting this information in a cohesive way ensures that the Department is meeting its obligations under the law.

The undersigned members and partners of PostsecData encourage the Department to heed these priorities as they finalize institutional guidance for reporting on the CARES Act. If you have any questions about these recommendations, please contact Mamie Voight, vice president of policy research at the Institution for Higher Education Policy ([mvoight@ihep.org](mailto:mvoight@ihep.org) or 202-587-4967).

Sincerely,

Alloy Engineering - Manufactures Education and Training Alliance  
Center for American Progress  
Center for Law and Social Policy (CLASP)  
Excelencia in Education  
Georgetown University Center on Education and the Workforce  
GW Institute of Public Policy, GWU  
Higher Learning Advocates  
Institute for Higher Education Policy  
NASPA - Student Affairs Administrators in Higher Education  
National Association for College Admission Counseling  
New America Higher Education Program  
Nexus Research and Policy Center  
Postsecondary Analytics  
State Higher Education Executive Officers Association  
Student Veterans of America  
The Education Trust  
Third Way  
uAspire  
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