

Higher Education Emergency Relief Fund (HEERF): Reporting

At this point, there have been three rounds of HEERF funding. For most Bible Colleges and Seminaries the classifications for reporting are:

CARES Act (HEERF I) – Four “buckets” (Student, Institutional, Minority Serving, FIPSE)
CRRSAA (HEERF II) – Two buckets (Student, Institutional)
ARPA (HEERF III) - Two buckets (Student, Institutional – with additional spending requirements)

Student reporting for all three generally involves posting specified points on an institution’s webpage.

For institutional funding, there is specified quarterly report forms (that have been ever-evolving) that must be posted to your website withing 10 days of each quarter’s end.

Now, in 2022, ED is requiring a new “brand” of annual reporting for HEERF expenditures in 2021.

In mid-January 2022, ED sent out a Word document that was a draft of the proposed new reporting form. It is 20 pages long and contains questions about expenditures, the diversity of students, numbers of students and faculty, HEERF website posting, etc. Ultimately, it appears to be a somewhat intrusive and time-consuming exercise. ED has offered assistance in filling out the form – but it is not clear what form that might take.

The announcement stated:

Institutions of Higher Education (IHEs) that received HEERF grant funds under the Coronavirus Aid, Relief, and Economic Security (CARES) Act; the Coronavirus Response and Relief Supplemental Appropriations Act (CRRSAA); and/or the American Rescue Plan (ARP) Act are required to submit an annual report describing how the IHE used the awarded funds during the performance period. Data collection for the Higher Education Emergency Relief Fund (HEERF) annual performance reporting period will occur between **April 11th to May 6th**. During this period, the portal will also be open for corrections to CARES Act Year 1 reports. The annual performance report addresses activities funded between January 1, 2021, through December 31, 2021. The annual reporting requirements are in addition to requirements to publish quarterly reports on the use of student and institutional portion funding.

And –

The information collected on this form will be reviewed by the U.S. Department of Education to ensure that HEERF grant funds are used in accordance with applicable requirements under the HEERF grant program and will be shared with the public to promote transparency regarding the allocation and uses of funds. Furthermore, the information collected will be analyzed to provide aggregate statistics on institutional uses of HEERF grant funds to address the impacts of COVID-19 on students and institutions. This report should be completed based on all HEERF activities funded from the CARES Act, CRRSAA, and ARP (in the applicable reporting periods. Under 34 CFR 75.720(b), all HEERF grantees must submit a HEERF Annual Report. The failure to timely submit a HEERF Annual Report is a violation of the

grantee's Certification and Agreement or Supplemental Agreement and may lead to adverse action.

As of February 15, 2022, the ED HEERF Reporting webpage stated...

<https://www2.ed.gov/about/offices/list/ope/heerfreporting.html>

Annual Performance Reporting Requirements

Reporting Period: The reporting period for the HEERF Annual Report will begin on January 1, 2021 and ends on December 31, 2021.

The Department will be collecting an annual report for HEERF grantees beginning April 11th - May 06th 2022. The Department will share more information regarding this annual report, to all individuals listed on the GAN, or who serve as submitters/editors for the 2020 HEERF annual report. The report will also require institutions to report on their uses of any remaining HEERF I CARES Act funds and HEERF II CRRSAA funds, in advance of the ARP annual reporting deadline.