Template Now Available for Higher Education Emergency Relief Fund Reporting – Student Portion  
May 11, 2020

Last week, the U.S. Department of Education ("Department") announced new reporting requirements for institutions of higher education that received their student portion of the Higher Education Emergency Relief Fund ("HEERF"). To support the sector, CECU has developed a reporting template that institutions can use to meet the Department’s initial 30-day reporting deadline. For some institutions, the reporting deadline could be this week!

**Reporting Obligation**

When applying for the student portion of the HEERF under Sec. 18004(a)(1) of the Coronavirus Aid, Relief, and Economic Security Act ("CARES Act"), an institution agreed to report certain information to the Education Secretary 30 days from the date the Certification and Agreement for Emergency Financial Aid Grants to Students was signed and every 45 days thereafter. On April 21, 2020, the Department released a Frequently Asked Questions explaining that instructions for reporting information to the Secretary will be published in a Federal Register notice.

On May 6, 2020, the Department published an electronic announcement reiterating that instructions for reporting information to the Secretary will be provided in the near future. In the meantime, however, to meet an institution’s initial 30-day reporting obligation, the Department is now requiring institutions that received their student portion of the HEERF to post the information listed below to the institution’s primary website. According to the Department, these seven items must appear in a format and location that is easily accessible to the public 30 days after the date when the institution received its student allocation and updated every 45 days thereafter. CECU is interpreting “received” to mean when the student portion is made available to the institution in the G5 system.

1. An acknowledgement that the institution signed and returned to the Department the Certification and Agreement and the assurance that the institution has used, or intends to use, no less than 50 percent of the funds received under Section 18004(a)(1) of the CARES Act to provide emergency financial aid grants to students.
2. The total amount of funds that the institution will receive or has received from the Department pursuant to the institution’s Certification and Agreement for Emergency Financial Aid Grants to Students.
3. The total amount of emergency financial aid grants distributed to students under Section 18004(a)(1) of the CARES Act as of the date of submission (i.e., as of the 30-day Report and every 45 days thereafter).
4. The estimated total number of students at the institution eligible to participate in programs under Section 484 in Title IV of the Higher Education Act of 1965 and thus eligible to receive emergency financial aid grants to students under Section 18004(a)(1) of the CARES Act.
5. The total number of students who have received an emergency financial aid grant under Section 18004(a)(1) of the CARES Act.
6. The method(s) used by the institution to determine which students receive emergency financial aid grants and how much they would receive under Section 18004(a)(1) of the CARES Act.
7. Any instructions, directions, or guidance provided by the institution to students concerning the emergency financial aid grants.

**Reporting Template**

CECU developed a user-friendly reporting template that institutions can use to report the seven items listed in the Department’s May 6, 2020 electronic announcement. The Fund Report template, which includes helpful directions in the form of comment bubbles, is available for download here. The template will download as a Microsoft Word document. Institutions should modify the template as needed and consult with their legal counsel, if necessary.
**Best Practices**

CECU recommends the following considerations as institutions begin to report HEERF data publicly:

- Once the student portion is made available in the G5 system, set a calendar reminder to ensure the initial Fund Report is posted to the institution’s website at the 30-day mark and updated every 45 days thereafter.
- Once an institution has developed a written policy and process for how it will determine and distribute the emergency financial aid grants to students, distribute as much of the student funds as possible during the initial 30-day window. The now-publicly available Fund Report will be heavily scrutinized if institutions are found to be withholding a significant portion of their student allocation without adequate justification.
- Keep the Fund Report simple, and generally only provide the information required by the Department.
- Underscore the institution’s commitment to transparency related to the receipt, use, and distribution of student funds.

**Additional Resources**

On March 13, 2020, CECU launched an information webpage for institutions responding to the Coronavirus pandemic. CECU’s Coronavirus webpage includes a multitude of helpful resources to assist higher education leaders understand the various legal and operational implications of COVID-19, including temporarily closing a campus or adapting courses to online learning.

Additionally, CECU developed the Guide for the Distribution of the Student and Institutional Portions of the Higher Education Emergency Relief Fund. First published on April 13, 2020 to address the student portion of the HEERF, this guide was updated on May 5, 2020 to include a new section describing how institutions should manage the institutional share of funds. With the recent update, this guide now comprises three distinct sections detailing the student and institutional portions of the HEERF as well as additional resources for school leaders.

For questions or concerns related to the Department’s new reporting requirements or the HEERF, please do not hesitate to contact Nicholas Kent, Senior Vice President of Policy and Research, at Nicholas.Kent@career.org.