



Accounting Tutorial

2022 HEERF Quarterly Reporting

Background

The Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Coronavirus Response and Relief Supplemental Appropriations Act (CRRSAA), and the American Rescue Plan Act (ARPA) provide budgetary relief to higher education institutions through numerous provisions. The Department of Education (ED) is administering all Higher Education Emergency Relief Fund (HEERF) allocations passed by Congress to date: those contained under CARES (\$13.95 billion), CRRSAA (\$22.7 Billion), and ARPA (\$40 billion). General information about the three relief programs is available in a [separate tutorial](#).

Data Collection

All institutions that received HEERF funding are required to prepare quarterly report forms (QRF) and post the forms on their website. ED released a new QRF in late June 2022 (OMB No. 1840-0849, expires 3/31/2024; a copy of the form is available [here](#)). The new form is used to report data regarding expenditures for both the student aid portion and the institutional aid portion of HEERF funds; there is no longer a requirement that institutions post a separate student aid narrative report. The applicable reporting periods for the new QRF are for all calendar quarters, starting with the second quarter 2022. Institutions must post QRFs on their website by close of business on the 10th calendar day following the end of the reporting quarter.

Purpose of the Tutorial

This accounting tutorial addresses quantitative information required for the new quarterly HEERF report. Consequently, this tutorial covers questions 2 and 3, and seeks to clarify report ambiguity in the interest of sector consistency for non-profit and public colleges and universities. This tutorial also highlights the differences between the new QRF and (a) the 2021 annual report (ARF), and (b) the previous QRF. See the tables later in this tutorial for a summary of the key differences.

General Observations and Recommendations

The new QRF combines quarterly reporting for both student aid and institutional aid HEERF funds. As a result, institutions are no longer required to post a separate quarterly student aid narrative report. The new QRF meets all HEERF quarterly reporting requirements.

Page 1 of the new QRF asks for the institution's award number(s) for the ten award types ("funding streams") included as part of HEERF. It then asks for the total amounts awarded broken down by HEERF section. Note that these are the amounts shown on the institution's Grant Award Notice (GAN). The institution's PR/Award number is found in Box 2 of each GAN. The table below maps funding streams to the corresponding HEERF section numbers:

Funding Stream	Description	Section (a)(1)	Section (a)(2)	Section (a)(3)	Section (a)(4)
P425E	Student Aid Portion Base award	X			
P425F	Institutional Portion Base award	X			
P425J	HBCU Historically Black Colleges and Universities		X		
P425K	TCCU Tribally Controlled Colleges and Universities		X		
P425L	MSI Minority Serving Institutions		X		
P425M	SIP Strengthening Institutions Program		X		
P425N	FIPSE Fund for the Improvement of Postsecondary Education			X	
P425Q	Proprietary Institutions Grant Funds for Students				X
P425S	SAIHE Supplemental Assistance to Institutions of Higher Education			X	
P425T	SSARP Supplemental Support under American Rescue Plan			X	

In a June 23, 2022 webcast, ED stated that reported disbursements should agree with the amounts institutions have drawn down in G5. This is a clarification of conflicting guidance provided by ED at various times in the past.

Expenditures for which the institution has not received a G5 drawdown should not be reported in the QRF.

If the institution has nothing to report for any requested data item, enter a zero in the applicable space on the QRF.

Several important requirements have been retained in the new QRF:

1. Institutions must use the fill-in form provided by ED for their QRF. No handwritten or scanned PDFs are allowed. All amounts should be rounded to the nearest dollar.
2. No additional materials should be added to the uploaded form.
3. The report is for the quarter and *not* cumulative, with one exception in Question 2b (see below).
4. The file must follow a very specific naming convention:
[8-digit OPEID]_[Survey name]_[Quarter/Year]_[Date of release]. For example, for the 2nd quarter 2022 QRF posted on July 10, 2022, the file name should be something like:

01234500_HEERF_Q22022_071022.pdf

5. Institutions are encouraged to email their QRF to HEERFreporting@ed.gov in addition to posting on the institution's website.

6. If necessary, institutions can update their quarterly report by redating the form, explaining the update, and posting the new report on their website using the same naming convention. During its June 23, 2022 webcast, ED indicated that the original report should be maintained on the institution’s website until three years after the end of the reporting period. The original report does not need to be updated to the new format, but the revised report must use the new QRF.

Returning to the example in item 4 above, if that QRF is amended on August 3, 2022, the new file name should be:

01234500_HEERF_Q22022_080322.pdf

Emergency Student Financial Aid

Reporting for HEERF (a)(1) fund disbursements is bifurcated between Institutional portion funds used for emergency aid financial grants to students (if any) and Student portion funds used to provide emergency aid to students. Accordingly, institutions that used (a)(1) Institutional portion funds for emergency student aid grants and did not track emergency student aid by funding source (Institutional versus Student portions) should use an allocation methodology to provide aid disbursement information. The methodology should be documented.

Question 2a

Enter the amount of (a)(1) Student aid funds the institution has not yet disbursed. This should be equal to the total award specified in the institution’s P425E GAN, minus amounts drawn down from G5 for the P425E funding stream to date.

Question 2b

To protect students’ personally identifiable information, when reporting the number of students who received HEERF emergency financial aid grants, if the total number of students receiving awards is less than 10, report “<10” in the table. If the total number of students receiving awards is more than 10, but the number of either undergraduate recipients or graduate recipients is less than 10, the institution should enter “-” in the undergraduate and graduate columns, and the actual total number of recipients in the total column.

For (a)(1) student aid portion funds, institutions must report both the amount disbursed during the reporting quarter, and the amount disbursed to date.

Reported amounts used to cover a student’s outstanding account balance for costs such as debt forgiveness, room, board, tuition, or fees, *are amounts for which the institution received affirmative written consent from the student to relieve active account balances* (in lieu of a direct payment via checks, direct deposit, payment apps, debit cards, and so forth).

For Question 2b, when reporting amounts used to cover outstanding account balances, only report amounts used to cover balances of students who also received a direct Emergency Financial Aid grant under (a)(1). For example, if Student A received a \$1,000 direct grant and had a \$500 account balance covered with HEERF funds, the \$1,000 would be included as an amount directly disbursed to students, while the \$500 used to satisfy Student A’s account balance would be reported in the “satisfy account balances” line of the funding stream used for that purpose.

If Student B did not receive a direct grant and had a \$500 balance covered with HEERF funds, the \$500 would be reported in Question 3b in the applicable funding source column (see the “Institutional Expenditures” section below for additional discussion).

Question 2b only relates to emergency student aid grants (and not account balance forgiveness allowable under the (a)(1) Institutional portion, (a)(2), and/or (a)(3) lost revenue rules).

For each column, the “HEERF Amount of Grants Disbursed” row should equal the sum of the individual rows reported in the table. The average amount awarded should be calculated by dividing the amounts reported in the “Grants Disbursed” row by the number of HEERF student recipients reported in the first two rows of the table.

Institutional Aid

Question 3

Part a – addresses how and when institutions expect to expend remaining HEERF funds. Because 3a is somewhat qualitative, it will be covered following parts b and c in this document.

Part b – asks for categorization of HEERF funds expended. Allowable uses are established by ED and documented in the certification agreements and FAQs. Funds drawn for an allowable use are considered expended by the institution under the terms of the HEERF grant.

Part c – addresses the types of lost revenue amounts claimed; the total amounts by category must agree to the lost revenue amount indicated in the “replacing lost revenue from all sources” line in Part b.

Part b:

Institutions must categorize HEERF (a)(1), (a)(2), and (a)(3) institutional expenditures during the reporting period. The table parallels 2021 annual reporting with a few exceptions. **Green text** indicates an item added to the new QRF; **red text** indicates an item not carried forward from the ARF to the QRF.

Summary of Changes from the ARF

ARF Item	New QRF Item	Comments
Various, table 8.a	Various, table 2.b	QRF adds “Include only amounts that benefited students who did directly receive Emergency Financial Aid Grants” language (see, e.g., page 7 of ARF compared to the first row on page 3 of QRF).
Page 8, maximum and minimum awards	N/A	Not requested in the new QRF.
Page 10, item 9.a.2	Table 3.a.ii	QRF asks for calendar year 2024 information.
Page 11, table 9.b, “Campus safety and operations” row	N/A	Expenditure types previously reported in this row should now be reported as either “Implementing evidence-based practices...” or in another appropriate expenditure category in the QRF (in either case, along with a footnote or explanatory comment).
N/A	Table 3.b	QRF adds a row for reporting HEERF (a)(2) funds used for “Construction, renovation, and real property”.
N/A	Table 3.b	QRF adds a row for expenditures subsidizing mental health resources (see NACUBO news item here).
Page 12, table 9.b, “Other Uses of (a)(2) or (a)(3) funds, if applicable” row	N/A	Row has been combined with “Other Uses of (a)(1)” row.

Recommendations: From the ARF to the new QRF

Institutions that reported room and board refunds and / or tuition discounts should report those items

under “other uses....” In this way, there is a clear mapping from those categories to other, and remaining line items will not be compromised when going from the quarterly reports (by line item) to the annual report. Institutions should document what they report under “Other uses....”

All individual line items in the 2022 ARF to be submitted in 2023 should agree with the corresponding quarterly reporting line items when all quarterly reports in 2022 are aggregated.

Institutions that may have reported discharging unpaid student account balances under “other uses...” of funds on their quarterly reports should ensure that all lost revenue claims are reported on the appropriate lost revenue line in the annual report.

The cost of COVID vaccine distribution should be reported as “Implementing evidence-based....” Any such expenditures reported in other lines on the institution’s quarterly reports should be moved to this category.

Although explanatory notes are not required for Part b or Part c of Question 3, ED has stated that they consider it a best practice to include explanations for all non-zero amounts.

The differences between the previous QRF and the new QRF essentially parallel those noted on the previous page. Differences include:

Summary of Changes from the Previous QRF

Previous QRF Item	New QRF Item	Comments
N/A	Question 2	New QRF includes reporting for both student aid and institutional aid.
N/A	PR/Award numbers	Four HEERF funding streams added (student aid, proprietary institution student aid, SAIHE, and SSARP)
N/A	Page 1 - Total amount of student funds awarded	Added to new QRF as part of combination of student and institutional reports into a single report.
N/A	Page 1 – link to ARF	Provide the link to the institution’s 2021 ARF.
N/A	Question 3	Question 3a added to new QRF.
Expenditure table	Question 3.b	<p>Rows added to new QRF:</p> <ul style="list-style-type: none"> • “Covering student outstanding account balances...”. See additional comments below. • “Indirect cost recovery...” • “Implementing evidence-based practices” – includes COVID vaccine distribution • “Construction, renovation...” – applies only to pre-approved expenditures of (a)(2) funds. • “Providing or subsidizing mental health resources...” – see NACUBO news item here • “Conducting direct outreach...”. • “Replacing lost revenue from all sources” – combines previous academic and auxiliary rows; details reported in new QRF question 3.c.

Previous QRF Item	New QRF Item	Comments
		<p>Rows not carried over from previous QRF:</p> <ul style="list-style-type: none"> • “Providing tuition discounts” – report as “Other uses...” • “Campus safety and operations” – report as part of “Implementing evidence-based practices” • “Replacing lost revenue...academic” – combined into “Replacing...all sources”. • “Other Uses of (a)(2)...” – combined with “Other Uses of (a)(1)...”. • “Replacing lost revenue...auxiliary” – combined into “Replacing...all sources”.
N/A	Question 3.c	New table detailing lost revenue.

Part c:

Institutions must report the type of lost revenue by allowable category on appropriate line items. All categories are addressed in the ED [March 19, 2021 lost revenue FAQ](#).

No amount for unpaid student accounts receivable or other student account debts should be reported in Question 2a **unless the student also received a direct emergency financial aid grant**. See the “Emergency Student Financial Aid” section above for more information.

Part a:

Unlike Parts b and c, Question 3a relates to the institution’s plans for HEERF Institutional Aid funds it has *not yet expended*. ED is requesting this information to determine how much of its allocation the institution has spent (Questions 3b and 3c) and intends to spend in the future (Question 3a).

Question 3a. If the institution 1) has already utilized its entire Institutional Aid portion, 2) has no plans to spend any remaining balance, or 3) intends to spend the remaining balance but has no specific designated purposes at this time, answer “No” and complete Question 3.a.i.

Otherwise, answer “Yes” and complete question 3.a.ii.

Question 3.a.i

Question 3.a.i asks whether the institution still intends to use its remaining HEERF funds. If so, and the institution has “set aside” some or all of its remaining funds for expected, but unspecified, expenditures or lost revenue, answer “Yes”, and move to Question 3.b. Otherwise, answer “No” and complete question 3.a.i-1.1.

Question 3.a.i-1.1

If none of its remaining HEERF funds are being “set aside” for future use, the institution must give a brief description of how it intends to identify future expenditures or lost revenue. Examples of possible responses:

The institution has already utilized its entire HEERF Institutional Aid allocation.

The institution will monitor expenditures and potential lost revenue to identify allowable uses of HEERF funds and will draw down funds accordingly.

Although the institution has not designated or reserved HEERF funds for specific purposes, it

expects additional COVID-related expenditures will be necessary in the future. As such expenditures are incurred, the institution will draw down funds accordingly.

Question 3.a.ii

If the institution responded “Yes” to Question 3.a, complete the table to show the amount designated by 1) calendar year in which the expenditure or lost revenue is expected to occur, and 2) the HEERF program fund from which funds will be drawn.

Recommendations: Change in QRF from accrual basis to drawdown basis

As noted earlier, ED clarified its guidance about the expenditure amounts that should be reported in the QRF. Reported amounts should tie back to the amounts drawn down from G5 for the quarter (the “G5 basis”).

If the institution has submitted previous QRFs using the accrual basis (reported expenditures were based on accounting system transactions, not G5 drawdowns), those reports should be amended. NACUBO recommends that institutions follow these steps:

1. Complete the Q2 2022 QRF (quarterly reporting form) on the G5 basis, if practicable. If this is not practicable, complete the Q2 QRF on the accrual basis, then amend it per step 2 below. ED has a specific naming convention for the quarterly reports. The filename will be **[institution OPEID]_HEERF_Q22022_071022.pdf**, reflecting the report’s due date.
2. Amend all previous QRFs, as applicable, to put them on the G5 basis. Note in each QRF the fact that it is a corrected report and put the amended submission date in the report and in the filename. For example, if the institution posted an amended Q1 2022 report on its website on July 18, 2022, the filename would be **[institution OPEID]_HEERF_Q12022_071822.pdf**. The institution should also include a comment in the amended QRF to explain why the report has been corrected.
3. In addition to posting the Q2 and amended versions on its website, the institution should email copies to ED at HEERFreporting@ed.gov. This is not a requirement, but ED encourages the practice.