

U.S. Department of Education Requires Higher Education Institutions to Post CARES Act Funding Information on Websites

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On May 6, 2020, the U.S. Department of Education (ED) issued an [electronic announcement](#) directing institutions receiving funds under the Higher Education Emergency Relief Fund (HEERF), as established by Section 18004 of the Coronavirus Aid, Relief and Economic Security (CARES) Act, to post information regarding such funds to institutional websites. These website disclosures are being mandated by ED pursuant to Section 18004(e) of the CARES Act and Section 4(c) of the [Certification and Agreement](#) for the emergency student grants portion of an institution's HEERF allocation.

Within 30 days after the date when an institution received its HEERF allocation for emergency student grants, the institution must provide the following information on its primary website in an easily accessible format and location, and must update the information every 45 days thereafter:

1. An acknowledgement that the institution signed and returned to ED 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 ED 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.

The electronic announcement also indicates that ED will provide further instructions for direct institutional reporting to ED, including a “30-day Fund Report” regarding individual Emergency Financial Aid Grant recipients and amounts. In preparing this 30-day Fund Report, institutions must use data suppression and other methodologies to comply with — and to protect the personally identifiable information contained in student education records under — the Family Educational Rights and Privacy Act (20 U.S.C. § 1232g; 34 CFR Part 99). For example, ED states that it does not expect institutions to report information about groups of 10 or fewer students. Similarly, if the total number of eligible students, the total of number of students who received emergency grants, or the difference between the two numbers is less than 10, then the institution should not display the number of students or the amount of emergency grants to students on publicly available website(s) controlled by the institution.

Institutions that accurately report the above information will meet the initial reporting requirements. ED intends to notify institutions of its preferred method for subsequent reports and reporting for other HEERF programs.

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