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The term "FAFSA Simplification" insinuates that the process will be easier for all affected parties (e.g., students and IHE's). This requirement of making the IHE collect and submit this information is far from "simplification." By removing the FWS earnings question from the FAFSA, ED has now shifted the burden of collecting this information from each of the over 27 million individual filers to a few thousand FA administrators that are already preparing for the major overhaul that will take place in a very short period of time. FAFSA Simplification requires IHE's to reprogram all of their internal processing software, completely revamp P&P's to ensure compliance, learn an entirely new way of understanding the new processes to be truly seen as the "expert" for our students, AND be able to train others to understand the new process in order to advise and guide our students accurately and effectively. All within a very short window of time.

Some software providers may make a reporting capability available for the FWS individual earnings information to be uploadable to COD through their software. Many schools, especially the smaller IHE's with limited staffing would be required to manually enter individual earnings information directly into a COD schema.

Do not punish the smaller schools that lack the technical support currently available to many of the larger schools.

****SOLUTION**** Build in COD an upload capability (like we have with FISAP) that would help to alleviate the administrative burden that is being placed on schools during a time of high stress caused by the impending changes that are coming in the months ahead. Building one program to help hundreds of schools is a much more efficient process to obtain required information quickly than it is to require these schools to dedicate hundreds of hours toward manual entry. Hours we don't have.