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I am writing to express my concerns regarding the administrative burden associated with reporting federal work study wages and the potential collection of additional data in the future.

I am concerned about both the scope of the new data collection and ED's method of communicating such a major change to institutional reporting requirements. It is especially troubling that ED has chosen to implement a burdensome new data collection this year, as financial aid offices struggle to implement the broad-ranging provisions of the FAFSA Simplification Act on their campuses in the face of historic staffing shortages.

The FAFSA Simplification Act instructs ED to collect Federal Work-Study (FWS) earnings data from institutions to accommodate the loss of this information from the FAFSA, where Congress pared down the list of questions the Secretary may ask of applicants. This single data point removed from the FAFSA now requires schools to submit a report with 95 new data elements. This is also due at the same time as the FISAP which reports Work Study earnings based on the aid year but this report requires reporting on the calendar year. Those are two entirely different reporting requirements.

ED should keep this administrative burden to a minimum by only collecting total calendar year wage information in this initial reporting period. Any expansion of this data request should be openly and fully communicated and negotiated with the student financial aid community.

Moreover, the prospect of collecting additional data in the future raises concerns about the potential for further administrative complexities. If the reporting process becomes increasingly intricate, it could place even more strain on educational institutions and hinder their ability to effectively manage federal work study programs. This could inadvertently undermine the very purpose of such programs, which is to support students in their pursuit of education and career development.

In conclusion, I urge the Department of Education to carefully consider the administrative burden placed on educational institutions when reporting federal work study wages. By implementing more efficient reporting procedures and minimizing additional data requirements, we can strike a balance that benefits both the institutions and the students they serve. Thank you for your attention to this matter.