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I understand that institutional reporting of student-level annual FWS wages is statutory, meaning only Congress could lift this requirement; However, I am concerned that ED is seeking to collect significantly more data than it needs to comply with the FAFSA Simplification Act. Fortunately, for the upcoming award year, ED has clarified that it will only seek the data it needs to comply with the law, but I am concerned about future years.

This concern is about items marked "For Future Use Only" in the 2023-24 Common Origination and Disbursement (COD) Technical Reference. Those items include a breakdown of individual student FWS earnings by institutional share and federal share, whether the student's job was classified as community service, annual student-level Federal Supplemental Educational Opportunity Grant (FSEOG), and more. This is far more information than is needed to comply with the FAFSA Simplification Act, and will stress the already strained resources at institutions. Every additional administrative burden requirement takes away from the time we have to meet with, and serve, our students as we have to pull resources away from student contact.

I encourage ED to only request what is required by the law and not add any additional requirements and refrain from taking any more of our resources away from student contact that is absolutely necessary.

I support information outlined in the NASFAA letter attached to my comment.

Thank you.