

Author Full Name : Anonymous**Received Date :** 07/06/2023 09:21 AM**Comments Received :**

As a Financial Aid Administrator, I find the scope of the proposed reporting of Federal Work Study wages to be inefficient and unnecessary. Much of this information is already reported on in the FISAP and it feels extremely intrusive to request/require additional reporting. Specifically, the law from Congress requires that only a student's annual FWS earnings be reported to be accounted for in the SAI calculation. While I entirely agree that using the actual reported funds will be far more accurate than a contributor self-reporting, I have a very difficult time understanding why there are any additional data elements to be reported in COD beyond that one dollar amount. The type of work (community service, location, etc.) performed by the student does not change that dollar amount or therefore their SAI or Pell Grant eligibility and is an unnecessary and large burden on Financial Aid Administrators. The reporting of FSEOG funds is also not required by the law. I must reiterate, this information is already being reported to the Department of Education through other required reporting. If the intent is for this COD reporting to replace the FISAP in the future, I would urge the Department to be forthcoming with this information as soon as possible. Financial Aid Administrators have a tendency to be extremely opposed to duplicated work and inefficient processes as it has been our job to manage intricate funding programs with their rules, regulations, and guidance and have learned to make the most of our valuable time and energy to award aid correctly. If it is not the intent of this proposed process to replace the FISAP, I wholeheartedly disagree with the extent of this reporting and its value to the determination of aid eligibility for our students.