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I would like to respectfully submit comments on ED's proposed information collection on institutional reporting of Federal Work Study (FWS) wages for Student Aid Index (SAI) calculation.

I appreciate ED's addition of a new burden estimate to account for initial startup activities for institutions. While 200 hours is daunting, it is critical that ED accurately estimate the time schools will need in order to be ready to report FWS earnings so we can prepare accordingly, especially given the short timeframe for compliance.

Understanding the Department has no control over Congress requiring it to collect annual work-study earnings data, I ask that ED commit to helping institutions manage that burden by issuing timely guidance, being responsive to new questions and issues as they arise, and not imposing other burdensome requirements on institutions during this time when we are already overwhelmed with preparing to implement the FAFSA Simplification Act on our campuses.

I ask that ED give institutions as much additional time as possible in this initial reporting year considering the FAFSA is delayed until December. If ED can align the reporting date with the FISAP, which is due only one day before the typical release of the FAFSA, ED can presumably set this year's deadline to the day before the 2024-25 FAFSA is released. This will provide institutions at least two extra months to prepare for this new reporting requirement.

Even with additional time, low-resourced institutions will struggle to meet this new reporting requirement. Two hundred hours of burden is an entire month of one staff member's time during an historic change to financial aid processing.

We appreciate ED's May 23, 2023, update to the COD Technical Reference that redesignated several data elements not necessary for compliance with the FAFSA Simplification Act as "for future use only." I remain concerned, however, about the scope of additional data reporting ED has proposed, even if only effective in future years. ED was tasked with collecting a single data element — the student's annual federal work-study earnings.

I don't believe ED has authority to collect the additional student-level data it includes in the new Campus Based Record. ED says in its response to one commenter, "The collection of other types of need-based employment is not required under the law," yet ED proposes to collect other FWS data and FSEOG data, all of which are also not required by law.

I remain concerned about the items marked for future use in the 2023-24 COD Technical reference, such as student-level FSEOG reporting and FWS reporting broken down by federal and institutional share, community service, and job location and development designation, among others. Aside from questions about ED's authority to collect this data and concerns over the reporting burden, some items may be impossible to report, such as situations where students have more than one FWS job with different designations. I also wonder how ED will handle conflicting information between COD and the FISAP with respect to reporting campus-based aid institutional and federal share information. We are not required to track student-level federal and institutional shares and have no guidance on how to do so.

While I am hopeful ED will abandon this effort to collect data it is not required to collect by law, if it pursues this path, it must consider all possible scenarios and ensure this data can be reported accurately.