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While in a vacuum I can appreciate ED's desire to collect additional information on the Campus-Based programs, this is not the time nor the manner to implement anything beyond what is required by law.

ED itself will admit it is under resourced, as evidenced by its recent budget requests vs. its current funding levels. It is also under significant strain to meet existing requirements, as evidenced by the delays in the rollout of many of the requirements of the FAFSA Simplification Act, including this data request around work-study income data which would be coming to software providers and schools to implement very late in the game even if we were talking about a stripped down minimal model with 4 truly required and basic fields (fileid, ssn, name, \$\$) and not a behemoth pushing 100 questions of varying availability and complexity.

At the same time, many institutions, and particularly community colleges, are slammed for resources. I realize ED does not understand nor particularly care. In cases where ED has legal obligations of its own, or particular agendas it is prioritizing, that approach is at least understandable but here the legal obligation is quite limited and the agenda unclear and piling on seems to be the entire policy thrust, or perhaps in a more generous light "we might want this someday" which I would still argue is not a valid approach to data collection at any time, but certainly not right now.

For both the sake of institutions and for ED's own capacity, as a policy matter, it should focus on matters that are either required (FAFSA simplification, a simple method of collecting and applying work-study wages to needs analysis, loan repayment) or more central to its policy goals (Gainful Employment seemingly, commencement of loan repayment, revision of loan plans, etc.).

As proposed, ED is leaving itself and its partners stretched perilously thin and for no clear present purpose, in a moment when crucial initiatives and work are underway yet far from complete and successful implementation.

Save the proposed template in mind for a future where all parties may have space to think critically about what data may be needed, how it could be collected, how accurate it reasonably can be, and most critically how it could actually be used to justify its collection.

In many cases, even when I disagree with ED's approach, I can at least appreciate their motivation. Here it's hard to understand the policy or practical aim, much less its priority in the context of this moment.

(part 1 of 2)