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In the broader view, ED also needs to think critically about administrative burden. While ED is very quick to cite schools' obligation to meet all 'administrative capability' standards, sometimes rightly so, it seems very content over the past decade to just keep expanding the pile of standards without any real reflection on the aggregation or prioritization of elements within the pile. While related to the FISAP in certain ways, and perhaps could one day replace two of the data tables within it, it does not and cannot replace other key parts of the FISAP. So it becomes one more thing in a very large pile.

This is relevant because on the one hand ED is happy to criticize at times that schools are too expensive, and yet does not seem to reflect that 200 hours here and 100 hours there, ad infinitum, reflect not just time but very real dollar costs. This 200 hour report, in monetary terms, will cost a typical school \$8,000 - \$10,000 in raw staffing or outsourcing costs. People who can accurately create or navigate very large XML files usually don't come cheap.

As with anything else does, if you look only at that one cost in isolation, that may not seem like much, but of course it is the aggregate that matters.

And even this piece, for a community college with 800 students, this report may translate to a per student cost of \$10 per student - much more per FWS recipient - or the tuition equivalent of 2-3 students going only to this one cost. Now, if ED could negotiate with Congress an increase to the CB ACA to offset these costs, there would still be a reasonable outcry about capacity and rushed implementation and poor choice of timing.

Of course an ACA bump won't happen, so these are just costs being passed on to students either as tuition increases to acquire the staffing to do this, else decreases to other services as we continue to have to shift resources towards reporting/compliance.

Looked at through an even broader lens, at some point ED is going to have to think about overhead costs of delivering these programs. While program integrity is important, sure ED would agree that there is some point where the overhead costs of delivering the funds (aside from all the other costs of college) defeat the point. If, hypothetically, delivering FSA funds required \$1 spent on operational overhead to deliver \$1 of aid, we would presumably all agree that was failed public policy.

ED, particularly in 3 of the past 4 administrations, has been very comfortable thinking about what it can add. And viewed in isolation, there is at least a good argument for many of these pieces. But there is a deep neglect of viewing of the whole. Wherever that overhead breakpoint is, we're continually moving towards it. If four new pieces need to be added, are there at least three that can be removed or streamlined? "What else?" is a very different question than "What's most important?"

As is, over the past 13 years, the pile has grown rapidly both in scale and complexity, which has made a lucrative business for consultants and others working around the FA space, but it has very significant tradeoffs for institutions and students.

This report is case in point of ED doing something because it thinks it can, not because it must nor has stopped to address whether it should, and particularly how this piece serves not just itself but the balance of public policy.