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Regarding ED's proposed information collection on institutional reporting of Federal Work Study (FWS) wages for Student Aid Index (SAI) calculation (Docket No.: ED-2023-SCC-0046):

Understanding ED has no control over Congress requiring it to collect annual work-study earnings data from institutions, 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 our office is already overwhelmed with preparing to implement the FAFSA Simplification Act while dealing with staffing issues.

ED responded to one commenter from the 60-day comment period that it plans to align annual student-level FWS reporting with FISAP reporting. I request that ED give institutions additional time in this initial reporting year considering the FAFSA is delayed until December. If ED can align the reporting date with the FISAP, ED can presumably set this year's deadline to the day before the 2024-25 FAFSA is released. This will provide us with at least two extra months to prepare for this new reporting requirement and even with additional time, it will likely be a struggle. Two hundred hours of burden equates to 5 weeks of one staff member's time.

I recommend that ED create an alternative optional process that permits us to update individual records manually in lieu of reporting earnings via COD, at least during this first year of implementation.

I appreciate ED's May 23, 2023, redesignation of several data elements not necessary for compliance with the FAFSA Simplification Act as "for future use only." I am still concerned, however, about the scope of additional data reporting ED proposes, 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 do not believe ED has the authority to collect the additional student-level campus-based aid data it includes in the new Campus Based Record Layout volume of the 2023-24 COD Technical Reference. 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 am 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 associated reporting burden, several items may be impossible to report, such as situations where students have more than one FWS position with different designations.

I also have questions about how ED will handle conflicting information between COD and the FISAP with respect to reporting campus-based aid institutional and federal share information. Institutions are not required to track student-level federal and institutional shares and have no guidance on how to do so. Does the Department plan to reconcile these data sources and, if so, how will ED resolve discrepancies it identifies? I am hopeful ED will abandon this effort to collect data it is not required to collect by law.