

Author Full Name : Melissa Hill**Received Date :** 07/06/2023 04:10 PM**Comments Received :**

We are opposed to any regulation that increases the burden and workload of financial aid staff. Please reconsider reporting requirements for the annual federal work study earnings data. Even with additional time, low-resourced institutions will struggle to meet this new reporting requirement. Two hundred hours of burden equates to an entire month of one staff member's time. We recommend that ED create an alternative, optional process that permits institutions to manually subtract from individual earnings the amount of prior-prior year FWS earnings in lieu of reporting earnings via COD, at least during this first year of implementation. Larger institutions may find the COD reporting a less burdensome option and choose to proceed that way, but smaller institutions would likely experience significantly less burden by updating individual records manually in their own systems.