

Author Full Name : Jasmine Johnson**Received Date :** 07/12/2023 06:10 PM**Comments Received :**

We are very concerned about the ability to manage the burden associated with this new implementation. We are not immune to the staffing shortages being experienced across industry, and with the simultaneous implementation of the FAFSA Simplification Act, we fear the consequences of this short implementation time frame will be negatively impactful to our ability to serve students. We have also been tasked with the public goal issued by Education Secretary Miguel Cardona to use at least 15% of FWS funds to compensate college students employed in community service activities and to devote any increase in the use of FWS compensation for community service to employment in P-12 schools or out-of-school time programs. As schools struggle to recover from the pandemic in regards to student employment, and must return to meeting the requirement of using at least 7% of its FWS allocation to employ students in community service jobs with at least one FWS student employed as a reading tutor for children in a reading tutoring project or performing family literacy activities in a family literacy project, by 24-25; we are facing serious challenges meeting the implementation of so many requirements in a short time frame with a lack of support and resources from ED.

We have not received formal notification that we have until sometime in December to implement this new requirement, if we do, even to accomplish this with the extension, the burden is extensive, and we would request that additional time is provided to implement.

This implementation also makes the awarding of state and institutional Work Study inequitable to students, who will no longer receive the benefit of having their earnings excluded from the student's total earnings during the calculation of the SAI, further burdening our institution who now must completely reevaluate our awarding strategies around Work Study as we consider the impact of fund sourcing to student's financial aid eligibility.