

Author Full Name : Aurie Clifford**Received Date :** 07/13/2023 11:57 PM**Comments Received :**

The move to collect wages from colleges at a student level for FWS is well-meaning to make it easier to calculate the SAI, however, reporting the data at that level is more complicated than Pell Grant and Direct Loan Disbursements. FWS wages are paid in a myriad of ways: stipends, wages paid directly to tuition and fees, and hourly paychecks that can be distributed weekly, bi-weekly and monthly. The wages vary, the benefits vary, the contribution (match does not apply to Title III and Title V institutions) to wages vary from institution to institution. Additionally, how an institution distributes the wages to the students vary. Student employees often work more than one job which makes parsing out wages, sick time, retirement, and healthcare deductions, between jobs difficult. Some institutions use third-party payroll systems such as ADP which do not feed into the main Student Information System (like Banner or PeopleSoft), therefore, extracting that information to upload to COD would be complicated. We recommend the Department of Education look for another way to collect the information for the SAI that would be more manageable. If schools reported wages one time per academic year, preferably the FAFSA year, or even twice per year, if data is needed between tax years like we currently do on the FISAP, this would drastically reduce the burden you place on schools reporting this data daily, weekly or monthly. This type of compromise would also help software providers that are struggling to keep up with all the regulatory changes that are being rolled out so regularly in the past three years. Thank you for taking this comment into consideration.