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**Comments Received :**

The Department is requesting comment on the quality, utility, and clarity of the information to be collected. However, the User Guide has yet to be published beyond the introduction, so it is impossible to respond at this time to the specifics of the collection. In general, there have been confusing definitions and requirements laid out thus far. While the lofty idea of holding institutions accountable for providing good education for the investment is admirable, it would be better to do so by providing funding and support, especially to public institutions that frequently have their budgets on the chopping block or are required to discount tuition regularly for various student groups without full reimbursement by the government. This current idea of collecting data that ostensibly measures "quality", then punishing institutions and the students who have to wade through the warnings and acknowledgements, is off base. This will increase barriers to entry for students by adding a waiting period and making the system more complicated. Additionally, institutions may no longer offer much-needed programs, like heath sciences, because they are at higher risk of failing metrics.

In response to question 3 about the reporting burden - the staff at my institution have already spent about 20 hours reviewing publications, attending webinars, and planning for this collection, and we haven't even started on the real data or with the hard work of aligning the data definitions from the missing User Guide to our system and aligning and consolidating data into the requested report formats. I estimate a total of 50 hours or more by the time we are done. The provided estimate of 8 hours per response is incredibly low.

Please reconsider the scope and timeline of this collection. Retrieving data like a students' total tuition, fees, books and supplies housing and food costs, and debt is not simple - especially as students change programs, relocate, take time off and return, and do all the unique things students do. Our systems were not designed to collect and report out this information efficiently, and given the wide range of students and enrollment and program changes and residency changes, I am concerned that there will be a need to calculate or at least verify thousands of records by hand.