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- (1) Our institution feels that this collection is not necessary to the proper functioning of the Department. Many institutions are already held accountable to accrediting boards and have safeguards in place to be sure their programs are successful and worthwhile.
- (2) considering the disastrous FAFSA this year, we are deeply concerned about the Department of Education being able to complete additional processing in a timely fashion. Focus will be split between continuing to fix the FAFSA process and any new process will only further slow progress in both categories.
- (3) we found the burden estimate for the initial Gainful Employment reporting in 2008 to be underestimated. We feel that the department has not taken into account the fact that they are asking for very detailed and specific data across multiple years when financial aid software is designed to provide data on a year by year basis. We could have allowed bad and inaccurate data to be pushed through directly from IT generated reports, but in order to provide accurate information there were a LOT of manual follow up processes to fix the corrupted and inaccurate data generated by trying to create reports of a nature that our systems were never meant to provide.
- (4) The Department could enhance the quality, utility, and clarity of the information to be collected by not requiring vast amounts of data from prior years, and rather just starting with the current year and moving forward from there. They could also allow institutions to report data year by year and compile their own "across years" results instead of making institutions do things that are entirely unnatural to their school year based software systems.
- (5) The Department could minimize the burden of this collection on the respondents by taking in raw data year by year and compiling their own results across the years of a student's enrollment instead of making the institutions do this part of the process which is not friendly with the way their software is designed. There could also be an allowance for estimates such as calculating costs based on credits taken and average bookstore charges instead of needing to calculate every student's actual bill individually across multiple academic years, which ends up being a complicated manual process since financial aid software was not created to do that kind of thing.