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(1) is this collection necessary to the proper functions of the Department;

No, I do not believe the data collection is necessary. This is especially true of graduate degree and certificate programs at non-profit institutions. If the goal is to root out institutions that leave their students without an adequate return on investment, there are already other metrics available to the Department of Education such as the Cohort Default Rate.

(2) will this information be processed and used in a timely manner;

No, I do not believe the information will be processed or used in a timely manner. The federal government already receives income data from tax returns, W-2 forms, etc. and knows who has borrowed a federal loan. The Department also receives program information through enrollment reporting. Couldn't these be paired?

(3) is the estimate of burden accurate;

The estimated burden is underestimated. The reporting requires coordination of multiple departments to gather the required data. In addition, updating the consumer information component will essentially involve nearly all programs. We are also still working through the delays of the 2024-25 FAFSA.

(4) how might the Department enhance the quality, utility, and clarity of the information to be collected; and

Additional guidance and delay the implementation to 2025. Determine if ED already has the data through other sources (enrollment reporting, income data, NSLDS, etc.).

(5) how might the Department minimize the burden of this collection on the respondents, including through the use of information technology.

Either cancel the implementation, or delay the implementation 1-2 years while only requiring it if a school's CDR is above the national CDR.