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Responding to three issues:

1) I appreciate ED's updated assessment of burden. While I have not analyzed it in depth due to time limitations on first pass it feels closer to reality, as an increase of 70% over the estimate they had provided a year ago. I do wish, however, it would give ED more pause that their assessment for public sector compliance alone is \$243M, which equates to \$22 per student presently enrolled in that sector, not counting the amount for ED's direct costs to implement and operate this program.

Loss is a public policy issue; but so is overhead.

2) While ED was dismissive of requests for further delays, and since February rolled out some additional resources and guidance, I would advocate that a delay of at least an additional 3 months should be seriously considered. As case in point, ED is simultaneously noting that PEP, CTP and programs that don't lead to a recognized degree are exempt from reporting. And yet, at the student level, schools are reporting all students including those in those programs, seemingly with an additional field added to flag that they should nonetheless be exempted. This is nonsensical and illustrative of how, less than 4 months prior to the reporting deadline, ED appears to be building the submarine at sea and leaving schools less time to prepare.

Similarly, the guidance released suggests all schools will need to designate whether a program is a for profit liberal arts program operating since Jan 2009. The question demarcates whether certain programs are G/E programs or not, but it is odd to ask this question of all institutions, much less programs, given it even could apply to a subset. It also is duplicative, since ostensibly this is data ED is already in possession of through existing data/resources. The question rather than becoming clearer the longer one looks at it, instead clarifies the above - ED does not appear to have worked through how to collect this information without creating additional, unnecessary burden for institutions.

While it may seem a simple matter for a public institution to flag this program question to no, or for a school that does not offer CTP to set the field response to no, it is still not insignificant labor to train staff to understand and respond. I understand the rush politically, certainly, but ED should take 3-6 additional months and smooth out the edges.

3) ED's tone in response to the prior wave of comments was insensitive to the point you should reflect. I don't know if you are seriously that righteous in your crusade, or just that disconnected. Schools, and particularly financial aid professionals are in a crisis. A colleague last week openly talked about their suicidality in a group forum.

The repeated, boilerplate response that "We gave you 2 additional months and 1 day, and we're letting you have transitional reporting, so really, we're heroes" coming from ED here is frankly, a sign of why schools feel that we are no longer in partnership with ED and ED staff. You clearly despise us, and we feel it.

I talk to a lot of colleagues, and no one believes you gave the additional two months as reprieve for the FAFSA rollout catastrophe, but only because ED itself was not ready to launch. ED is in danger of severing its relationship with its ostensible school partners. While understanding response to public comment is a quasi-legal document, it wouldn't have hurt to sound like you were actually listening, or heaven forbid cared.