

Incoming Comment from 60-day comment period on 2022 Federal Work Study (FWS) Wages for Student Aid Index

How often will we have to report FWS wages? We suggest it should be once at the end of the year. It should coincide with the time of year v
Will we be able to upload the data or will this be completely manual? An upload process would be much appreciated.

The simplification of the FAFSA has led to greater administrative burden for Institutions of Higher Education, which now must provide ED
longer obtained by the FAFSA form. The requirement to submit FWS earnings for students is one such burden on already busy financial aid
which are understaffed. The late availability of the template on which the information must be provided makes reporting the information eve
FAFASA simplification serves only the filers, who will still be overwhelmed by the form, not anyone else involved in the administration of

I am concerned with how this change will be implemented, and whether it will cause an undue administrative burden on the schools, at the s
processing times and inconveniencing students. Would the Department be sending the school individual requests for each student before the
Would an additional document requirement be added to the student's file after ISIR generation, causing the students/schools additional work
student file? How would a school access work study earnings from another school when a student transfers? Without a planned method of ob
information we could end up with students being unable to access aid.

I think reporting FWS wages directly to the department from will be a big help to students, but the format and instructions on how this will b
expedited to not delay the FAFSA. It will take a considerable amount of time to work with our student information systems platforms and IT
accurately pull and report this information. I believe if we can't have at least 6 months to implement with final regulations and technical requ
to be pushed to a future aid year.

If the purpose is to more accurately determine the SAI, what about reporting income earned from other need-based employment programs an
employment portions of fellowships and assistantships? Some schools have State and/or Institutional work-study programs. Also, ideally, co
earnings be noted somehow on W2s, and therefore reported to the IRS? Then, schools would not need to report these earnings, and instead c
the IRS along with the other income information. I'm not sure what would go into this process, but it's worth exploring. Thank you.

If schools are going to be required to submit information to COD in an XML format, nobody will be able to manually create such files due to
Schools will have to rely on their student information system, and vendors will need more lead time in order to create and test a new process
files. I hope another method of submitting the required information, such as a website application or a flat file, will be considered.

While ED is obligated to comply with the FAFSA Simplification Act, it needs to make a concerted effort to partner with institutions to disclose available and achievable. This process should be focused, streamlined, and also take into account that, for federal aid purposes our systems are built around award years. The needs of data for FWS for CPS extraction, conversely, fall in line with the data handled specifically for payroll, and by necessity have some overlap, in many systems that is not particularly robust because it has never needed to be and may prove a significant burden by combining and peeling those data layers. If, as seems to be the case, ED is proposing to design its collection in line with the <https://fsapartners.ed.gov/sites/default/files/2023-03/2324CODTechRefVol4.pdf> draft, we are starting out the conversation in a very challenging position. The majority of these fields seem extraneous for this purpose. There are 95 listed fields, and while it appears 26 of them are optional, that still leaves 69 fields per student. Even items ED may legitimately have curiosity about, like institutional/federal share, will be more complicated for many schools because it may not even exist or not be utilized as a field in their SIS which may require manual manipulation of the extract or other workarounds. More pertinent here, it's not even necessary information for ED's current purposes to comply with the FAFSA Simplification Act, and it's not clear the value it holds as aggregated data. Clearly the purpose is significantly more expansive, and thus also complicated, than stated, but at least for now should be dialed back to enable ED and schools to meet the statutory need in a reasonably timely and accurate manner. This significant expansion of requirements on all parties to meet necessary timelines. In terms of burden, realistically this is going to be significantly more than 3-4 hours for most schools and institutions where this will require significant manual work in the same way GE did. As one simple issue, the SEOG information (again, not a current statutory need at all) is based on Award Year, whereas FWS is based on calendar year, which suggests at least two reporting windows and the potential for those submissions to conflict with each other and cause rejects, which then becomes an even more significant time commitment on their immediate need, ED needs to really significantly strip back to only the data elements required to comply with current law: SSN/Name/Address/FWS earned in said calendar year, and the handful of fields needed to mark the institution and report tracking. If, as this document suggests, ED wants to expand out into a much more robust Campus-Based reporting well beyond the bounds of what the law requires, they should take the time to survey a broad range of schools to see what data is reasonably available (not to mention meaningful) and how it would be reported most effectively and with a reasonable amount of administrative burden. Here the ask is very expansive, doesn't serve a clearly stated purpose, and seems likely to me to create more problems by serving both as calendar year reporting for FWS and award year reporting for SEOG. Other early commentators focused heavily on the burden, and I don't disagree with them, though from prior experience know that's not always received as a compelling argument. But here ED should be cautious because they seem intent to move far beyond what current law requires for no clear purpose, and in a manner that I think many schools will struggle to comply with, and may also create unforeseen issues for COD. This creates real challenges for all parties in meeting required timeframes and the risk of inaccurate or unreliable data being transmitted.

While I understand the need to provide this information so as to ensure the correct FAFSA filing information, I believe the Department is overstepping the need for information with the schema provided. First, most financial systems are built on a Fiscal year basis and usually from July 1 to June 30. Wages for FWS jobs are collected within these systems and are totaled by academic year on a calendar year basis. This new report will require institutions to segment out the wages earned for two academic years (from January 1 which is usually the start of the previous academic year through December 31 which is usually the end of the subsequent academic year). This data collection adds a level of complexity that reporting will likely be required through two different award years. While HR departments (and particularly payroll) will have the calendar year information required for tax reporting, they will NOT likely have the information to distinguish between wages earned in a Federal Work Study job and wages earned in other ways by the student during the calendar year at the institution. It is increasingly the case that students who earn FWS wages also have other income at the institution, and therefore segmenting out just the FWS wages will be difficult at best. This complexity means that any additional non-FWS fields represent a significant burden. Adding additional fields in the schema (just as job start date, Federal Share, Institutional Share, etc.) is not necessary and should not be included. The Department is overreaching here by essentially requiring unit level data on campus based awards. This is unnecessary and not part of this implementation.

Given short timelines and that there is so much change happening now, I strongly recommend that only the minimum information required to be collected from the calendar year 2022 in support of 2024-2025 Student Aid Index (SAI) calculation. Details such as the institutional/federal payment period dates and amounts can be added in subsequent years as necessary. Both institutional staff and software vendors will need to be able to and effectively support the more detailed reporting.

I agree with schools providing FWS earnings to the Dept as I found often times the student would misreport or forget to report their FWS earnings. I know that the FAFSA uses prior-year earnings and no one seems to keep their tax returns or W-2s. I do not agree with the Dept asking for more than what is required by the FAFSA simplification legislation. Start date and end date do not make sense when the earnings data is half from the first and half from a second aid year. Which start date and end date should be used? The other data is simply a waste of time if it is not required by legislation and being used for any purpose at this time. I find the constant slicing and dicing of data by demographical data to be stepping toward segregation and away from it. Please do not implement the additional data elements that are not required by the FAFSA Simplification Act.

I am gravely concerned about the reporting requirements and the administrative burden that the updated information indicates there will be. I would like to request the FWS data that is needed to calculate the student's SAI and nothing more. I work in a very small college, and we have used a third-party provider for the past several years. We are trying to move in-house to better serve our students. We have a very small financial aid team. I am concerned that the data may take time that will affect our ability to work with our students directly. Please consider the wide breadth of types of colleges and states. ONLY the minimum amount of data is collected and not arbitrary data for purposes not related to computing the SAI. Thank you.

I do believe that the Department is severely underestimating the complexity for institutions of higher education to provide this information. We are an institution that offers the ability to work to every undergraduate student on our campus. While only part of what is funded comes from the federal government, it is difficult for students to understand where their funds are coming from -- federal or institutional dollars -- and I fear will do a lot of impact that will affect the outcome. Additionally, as mentioned in other comments, colleges and their operating systems use Fiscal year, not calendar year and wages for FWS are collected as part of the fiscal year. This new reporting requirement will require institutions to separate out the wages earned for two academic years (e.g., 2020-21 which is usually Spring of the previous academic year through December 31 which is usually Fall of the subsequent academic year). This level of complexity since reporting will likely be required through two different award years and will be difficult for payroll offices to complete. Financial Resources and Payroll will have a difficult time sussing out this information in a format that will be required by ED for our students.

While the accuracy of FWS reported will increase with schools reporting the data, there has to be systems in place. This will take time, much more than 100 hours estimated. With all of the extra data fields requested, we will have to have our developers do some customization between different systems. This will take closer to 250 hours to complete. This is in addition to all of the other changes schools have to do with the FAFSA Simplification Act, communications, website, systems. All of this and we no longer have federal trainers to contact, nor in person training. The administrative burden on schools, yet you call us partners.

Federal Work Study reporting to COD & Housing Removal from 2024-25 FAFSA. I am sure I speak for many aid administrators that are burdened by the numerous changes that FSA has made during the pandemic. In your effort to oversimplify the process for students, you have buried us in more complexity to handle. You have our aid offices implementing multiple complicated, labor intensive, time consuming processes one on top of the other. Our staff can't just hire additional staff members when they are dealing with reduced budgets, lower enrollment and no longer have access to HEERF funding.

Please consider simplifying the data being reported for FWS earnings. I work at a large public two year and would need to coordinate with several departments to collect the data being requested. This would create a very large administrative burden for our office at an already busy time. In addition, like many schools, we are facing budget shortages and are understaffed and under resourced. Also, I am concerned that we will not have sufficient time to create such a system by the reporting deadline. As an alternative, could FWS earnings be reported on a W-2?

If a student submits a FAFSA using the Data Retrieval Tool, but later needs to make any sort of correction, they are unable to do so without creating an issue with the Student or Parent Financials tab(s). It generates an alert that states they must enter their tax information on that page, but the tax info was used is greyed out and the student is not able to proceed due to the abovementioned alert. My hope is that the new digital FAFSA form is programmed so that it recognizes previous DRT involvement and allows the student to proceed beyond the affected financials tab.

As a federally-recognized Work College, our FWS funds are distributed as grants. Our students do not receive a W-2, and their AGIs (if any) do not include FWS earnings. Will Work Colleges still be required to report this information to COD? It seems doing so would exaggerate the amount of income.

Like many others, I am gravely concerned about the FWS reporting requirement and the increased amount of administrative burden on our small school, and our small staff has to administer all the federal programs, state programs, veteran's affairs, HEERF, etc. These are already being administered; adding more reporting requirements is going to place an untenable strain on our staff. We don't have an easy way to gather FWS data. Our I.T. staff is also under-resourced. Please reconsider this requirement at least for the upcoming award year.

Comment # Commenter

4 jt@berkeleycollege.ed

5 Anonymous

6 Gina Wenzel-Garza /
gina.wenzel-
garza@arapahoe.edu

7 Dustin Zimmerman

8 Anonymous /
craig.sandesron@mnsu
.edu

9 Anonymous

10 Peter Goss /
peter.goss@pcc.edu

11 Daniel Barkowitz /
dbarkowitz@miami.edu

12 Sharon Clough /
sharon.clough@regent
education.com

13 Melinda Fedeler /
melinda.fedeler@dsu.e
du

14 Anonymous /
holly.swanson@cbsho
uston.edu

15 Karen Hart Bucher /
kbucher@su.edu

16 Anonymous

17 lowreyp@gtc.edu

18 Sarah Loepker /
sarah.loepker@pcc.ed
u

19 Kendra Rathbone /
rathbone@uidaho.edu

20 Anonymous /
sprya@bera.edu

21 Anonymous

FSA response

Yes, reporting will be required annually and the timing of the annual release will align with the FISAP release, enabling schools report FWS wages for the prior calendar year in advance of the FAFSA release for the upcoming year. Schools will have the option to utilize the Campus-Based schema to submit their FWS data in batches, or manually via COD Web, but there will not be an upload option available at this time. Please see the complete and updated Volume 4 of the COD Technical Reference (<https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2023-05-23/2023-2024-cod-technical-reference-may-2023-update-now-available>). An additional Electronic Announcement with further operational guidance will also be forthcoming this summer.

Thank you for your comment. We are bound to implement the law as mandated by the FAFSA Simplification Act. Only an act of Congress can change such requirements.

Schools will be required to report FWS wages on behalf of all of their students that earned FWS wages at their institution during the calendar year being requested. Reporting should occur in advance of the release of the FAFSA so that FWS data may be captured in the Student Aid Index (SAI) calculation upon FAFSA submission, limiting any delays to aid processing. In addition to the latest version of Volume 4 of the COD Technical Reference that was recently posted (<https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2023-05-23/2023-2024-cod-technical-reference-may-2023-update-now-available>), an additional Electronic Announcement with further operational guidance will also be forthcoming this summer.

Thank you for your comment. Please see the complete and updated Volume 4 of the COD Technical Reference (<https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2023-05-23/2023-2024-cod-technical-reference-may-2023-update-now-available>). An additional Electronic Announcement with further operational guidance will also be forthcoming this summer.

Thank you for your comment. The HEA, as amended by the FAFSA Simplification Act, under Sec 483 stipulates what information may or may not be collected by the FAFSA form. Specific to work study wages, Sec 483(a)(2)(F) states: "With respect to an applicant who has received income earned from work under part C of this title, the Secretary shall take the steps necessary to collect information on the amount of such income for the purposes of calculating such applicant's student aid index and scholarship award for a Federal Pell Grant, if applicable, without adding additional questions to the FAFSA, including by collecting such information from institutions of higher education participating in work-study programs under part C of this title." The collection of other types of need-based employment is not required under the law.

Thank you for your comment. Schools will have the option to utilize the Campus-Based schema to submit their FWS data in batches, or manually via COD Web, but there will not be an upload option available at this time. Please see the complete and updated Volume 4 of the COD Technical Reference (<https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2023-05-23/2023-2024-cod-technical-reference-may-2023-update-now-available>) for clarity on the required data within this collection, and the reporting methods being made available. An additional Electronic Announcement with further operational guidance will also be forthcoming this summer.

Thank you for your comment. While the Campus Based schema is being built with consideration for possible future data need information is being requested as part of this collection that is not required under the FAFSA Simplification Act or for the purpose of matching student records in the COD System and the FAFSA Processing System. Please see the complete and updated Volume of the COD Technical Reference (<https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2023-05-23/2023-2024-cod-technical-reference-may-2023-update-now-available>) for clarity on the required fields within this collection and the reporting methods being made available. An additional Electronic Announcement with further operational guidance will also be forthcoming this summer.

Thank you for your comment. While the Campus Based schema is being built with consideration for possible future data need information is being requested as part of this collection that is not required under the FAFSA Simplification Act or for the purpose of matching student records in the COD System and the FAFSA Processing System. Please see the complete and updated Volume of the COD Technical Reference (<https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2023-05-23/2023-2024-cod-technical-reference-may-2023-update-now-available>) for clarity on the required fields within this collection and the reporting methods being made available. An additional Electronic Announcement with further operational guidance will also be forthcoming this summer.

Thank you for your comment. While the Campus Based schema is being built with consideration for possible future data need information is being requested as part of this collection that is not required under the FAFSA Simplification Act or for the purpose of matching student records in the COD System and the FAFSA Processing System. Please see the complete and updated Volume of the COD Technical Reference (<https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2023-05-23/2023-2024-cod-technical-reference-may-2023-update-now-available>) for clarity on the required fields within this collection and the reporting methods being made available. An additional Electronic Announcement with further operational guidance will also be forthcoming this summer.

Thank you for your comment. While the Campus Based schema is being built with consideration for possible future data need information is being requested as part of this collection that is not required under the FAFSA Simplification Act or for the purpose of matching student records in the COD System and the FAFSA Processing System. Please see the complete and updated Volume 4 of the COD Technical Reference (<https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2023-05-23/2023-2024-cod-technical-reference-may-2023-update-now-available>) for clarity on the required fields within this collection and the reporting methods being made available. An additional Electronic Announcement with further operational guidance will also be forthcoming this summer.

Thank you for your comment. While the Campus Based schema is being built with consideration for possible future data need information is being requested as part of this collection that is not required under the FAFSA Simplification Act or for the purpose of matching student records in the COD System and the FAFSA Processing System. Please see the complete and updated Volume 4 of the COD Technical Reference (<https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2023-05-23/2023-2024-cod-technical-reference-may-2023-update-now-available>) for clarity on the required fields within this collection and the reporting methods being made available. An additional Electronic Announcement with further operational guidance will also be forthcoming this summer.

Thank you for your comment. Please see the complete and updated Volume 4 of the COD Technical Reference (<https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2023-05-23/2023-2024-cod-technical-reference-may-2023-update-now-available>) for clarity on the required fields within this collection, and the reporting methods being made available. An additional Electronic Announcement with further operational guidance will also be forthcoming this summer.

Thank you for your comment. Please see the complete and updated Volume 4 of the COD Technical Reference (<https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2023-05-23/2023-2024-cod-technical-reference-may-2023-update-now-available>) for clarity on the required fields within this collection, and the reporting methods being made available. An additional Electronic Announcement with further operational guidance will also be forthcoming this summer.

Thank you for your comment. We are bound to implement the law as mandated by the FAFSA Simplification Act. Only an act of Congress can change such requirements.

Thank you for your comment. Please see the complete and updated Volume 4 of the COD Technical Reference (<https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2023-05-23/2023-2024-cod-technical-reference-may-2023-update-now-available>) for clarity on the required fields within this collection, and the reporting methods being made available. An additional Electronic Announcement with further operational guidance will also be forthcoming this summer.

Thank you for your comment. We will share your concern with the appropriate office for further consideration.

Thank you for your question. This question will be addressed in a Electronic Announcement this summer that will provide further operational guidance on reporting FWS wages to the Department.

Thank you for your comment. We are bound to implement the law as mandated by the FAFSA Simplification Act. Only an act of Congress can change such requirements.