

## Incoming Comment 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 combining and peeling those data layers. If, as seems to be the case, ED is proposing to design its collection in line with the draft, <https://fsapartners.ed.gov/sites/default/files/2023-03/2324CODTechRefVol4.pdf> draft, we are starting out the conversation in a very challenging way as 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 it should be dialed back to enable ED and schools to meet the statutory need in a reasonably timely and accurate matter. 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. In their immediate need, ED needs to really significantly strip back to only the data elements required to comply with current law: SSN/Name/ID/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 at 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 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 aid 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 previous academic year through December 31 which is usually Fall of the subsequent academic year). This data collection adds a level of complexity to reporting that will likely be required through two different award years. While HR departments (and particularly payroll) will have the calendar year data (which is 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 calculate FWS 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 more time to 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. Now that the FAFSA uses prior-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 aid year 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 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 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 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 federal dollars -- and I fear will do a lot of impact on the outcome. Additionally, as mentioned in other comments, colleges and their operating systems use Fiscal year, not calendar year and wages for students 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 (one 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 250 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, including 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 numerous changes that FSA has made during the pandemic. In your effort to oversimplify the process for students, you have buried us in more work to handle. You have our aid offices implementing multiple complicated, labor intensive, time consuming processes one on top of the over. 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 earning. 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 earning be reported on a W2?

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) exclude 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.

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## FSA response

Yes, reporting will be required annually and the timing of the annual release will align with the FISAP release, enabling schools to report FWS data a year in advance of the FAFSA release for the upcoming year. Schools will have the option to utilize the Campus-Based schema 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>) and 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 the law.

Schools will be required to report FWS wages on behalf of all of their students that earned FWS wages at their institution during the reporting period. 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, avoiding any delays to aid processing. In addition to the latest version of Volume 4 of the COD Technical Reference that was recently published (<https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2023-05-23/2023-2024-cod-technical-reference-may-2023-update-now-available>)) and additional Electronic Announcement with further operational guidance will also be forthcoming this summer.

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

Thank you for your comment. Schools will have the option to utilize the Campus-Based schema to submit their FWS data in batch 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>) and 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 needs, this collection that is not required under the FAFSA Simplification Act or for the purposes of matching student records in the COD. Please see the complete and updated Volume 4 of the COD Technical Reference (<https://fsapartners.ed.gov/knowledge-center/23/2023-2024-cod-technical-reference-may-2023-update-now-available>) for clarity on the required fields within this collection. An additional Electronic Announcement with further operational guidance will also be forthcoming this summer.

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Thank you for your comment. While the Campus Based schema is being built with consideration for possible future data needs in this collection that is not required under the FAFSA Simplification Act or for the purposes of matching student records in the COD 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.

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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 information on the impact of the law on 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 the law.

**Incoming Comment on 2022 Federal Work Study (FWS) Wages for Student Aid Index**

The move to collect wages from colleges at a student level for FWS is well-meaning to make it easier to calculate the SAI, however, reporting the data at that level is more complicated than Pell Grant and Direct Loan Disbursements. FWS wages are paid in a myriad of ways: stipends, wages paid directly to tuition and fees, and hourly paychecks that can be distributed weekly, bi-weekly and monthly. The wages vary, the benefits vary, the contribution (match does not apply to Title III and Title V institutions) to wages vary from institution to institution. Additionally, how an institution distributes the wages to the students vary. Student employees often work more than one job which makes parsing out wages, sick time, retirement, and healthcare deductions, between jobs difficult. Some institutions use third-party payroll systems such as ADP which do not feed into the main Student Information System (like Banner or PeopleSoft), therefore, extracting that information to upload to COD would be complicated. We recommend the Department of Education look for another way to collect the information for the SAI that would be more manageable. If schools reported wages one time per academic year, preferably the FAFSA year, or even twice per year, if data is needed between tax years like we currently do on the FISAP, this would drastically reduce the burden you place on schools reporting this data daily, weekly or monthly. This type of compromise would also help software providers that are struggling to keep up with all the regulatory changes that are being rolled out so regularly in the past three years. Thank you for taking this comment into consideration.

Hoping you can accept my comments for the FWS wages.

Please allow additional time for these reporting requirements. Even with additional time, low-resourced institutions will struggle to meet this new reporting requirement. Two hundred hours of burden equates to an entire month of one staff member's time. Many institutions just do not have the resources to accommodate reporting requirements and advising students. ED should create an alternative, optional process that permits institutions to manually subtract from individual earnings the amount of prior-prior year FWS earnings in lieu of reporting earnings via COD, at least during this first year of implementation.

Please allow additional time for these reporting requirements. Even with additional time, low-resourced institutions will struggle to meet this new reporting requirement. Two hundred hours of burden equates to an entire month of one staff member's time. Many institutions just do not have the resources to accommodate reporting requirements and advising students. ED should create an alternative, optional process that permits institutions to manually subtract from individual earnings the amount of prior-prior year FWS earnings in lieu of reporting earnings via COD, at least during this first year of implementation.

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Attached please find comments from the National Association of Student Financial Aid Administrators

We are very concerned about the ability to manage the burden associated with this new implementation. We are not immune to the staffing shortages being experienced across industry, and with the simultaneous implementation of the FAFSA Simplification Act, we fear the consequences of this short implementation time frame will be negatively impactful to our ability to serve students. We have also been tasked with the public goal issued by Education Secretary Miguel Cardona to use at least 15% of FWS funds to compensate college students employed in community service activities and to devote any increase in the use of FWS compensation for community service to employment in P-12 schools or out-of-school time programs. As schools struggle to recover from the pandemic in regards to student employment, and must return to meeting the requirement of using at least 7% of its FWS allocation to employ students in community service jobs with at least one FWS student employed as a reading tutor for children in a reading tutoring project or performing family literacy activities in a family literacy project, by 24-25; we are facing serious challenges meeting the implementation of so many requirements in a short time frame with a lack of support and resources from ED. We have not received formal notification that we have until sometime in December to implement this new requirement, if we do, even to accomplish this with the extension, the burden is extensive, and we would request that additional time is provided to implement. This implementation also makes the awarding of state and institutional Work Study inequitable to students, who will no longer receive the benefit of having their earnings excluded from the student's total earnings during the calculation of the SAI, further burdening our institution who now must completely reevaluate our awarding strategies around Work Study as we consider the impact of fund sourcing to student's financial aid eligibility

It is in the best interest of the Financial Aid Office NOT to put additional reporting requirements on them. The information being requested is reported annually on the FISAP report already as a whole, Why must the Department of Education view each individual students work study wages when they are use to help pay for their education to begin with. With most if not all schools suffering from staffing shortages not to mention the mass exodus they are experiencing because of all the upcoming changes for 24/25, it's not fair to put more responsibilities on them when, the amount of wages holistically is being reported annually anyway. Please reconsider NOT putting additional burden on the people you rely on to do the job of keeping both schools and students in compliance with the current regulations.

Given the lack of clear guidance and significant burden not just on the aid office but the student employment and human resources, the timeframe to get this done and the vagueness of the request does not give universities enough time to properly implement this and the other changes proposed for the 2024-25 aid year. This will completely change the way we track and report student employment, so much so that our current systems are not able to properly handle the request, as our reporting has always been based on an aid year not an IRS reporting year, not to mention if they are going to start requesting additional items and expect a change in schema. We need more time and more clarity before we can be expected to implement this burden (on top of all of the other changes going into effect for the 2024-25 aid year).

The additional 200 hours of FWS reporting is an administrative burden that will result in hardship for many colleges and universities, including mine. Please consider an alternative method to this data collection.

The estimated 200 hours ED projects the new reporting requirements will take institutions to comply will put a strain on already overburdened Financial Aid Offices at a time when staff are gearing up to take on the historic changes required by the FAFSA Simplification Act. Although it is understood that this reporting is a requirement of the federal law, any effort to reduce the reporting burden will be critically important. Giving institutions as much advance notice and training on these new reporting requirements is crucial to the successful implementation of this new obligation.

Please provide a streamlined and simple way to provide the required data, and please do not ask for more information than is required. Financial aid offices around the nation, including ours, do not have the staff or other necessary resources to handle additional, unnecessary tasks that are imposed on us just for curiosity's sake.

I am the director of financial aid at a small, rural, private non-profit college in Wisconsin. As it is, we have had two of the four financial aid positions open since the end of March. We simply do not have an extra 200 hours of time or resources to complete these tasks along with every other task that has been dropped on the financial aid offices. With these changes, it is getting harder and harder to retain staff and hire new ones. This is a tremendous burden on our office

U.S. Department of Education (ED)  
Governance and Strategy Division

To whom it may concern, Wheaton College (IL) respectfully requests reconsideration on the scope of data reporting ED proposes to collect in addition to the student's annual federal work study earnings. It is unclear on the authority by which the additional data elements are requested as they are not needed for FAFSA completion in 2024-25. Additionally, our team is already stretched to capacity implementing the changes associated with the 2024-25 award year and adding the non-required data elements to the reporting elements will take away much needed time from other critical implementation efforts, such as technical set-up, communication plans, and customer service associated with this transitional year. Thank you for the opportunity to comment on this proposed information collection. If you have any questions regarding these comments, please contact me at [karen.belling@wheaton.edu](mailto:karen.belling@wheaton.edu).

Sincerely,  
Karen A. Belling  
Director of Student Financial Services  
Wheaton College

While in a vacuum I can appreciate ED's desire to collect additional information on the Campus-Based programs, this is not the time nor the manner to implement anything beyond what is required by law. ED itself will admit it is under resourced, as evidenced by its recent budget requests vs. its current funding levels. It is also under significant strain to meet existing requirements, as evidenced by the delays in the rollout of many of the requirements of the FAFSA Simplification Act, including this data request around work-study income data which would be coming to software providers and schools to implement very late in the game even if we were talking about a stripped down minimal model with 4 truly required and basic fields (fileid, ssn, name, \$\$) and not a behemoth pushing 100 questions of varying availability and complexity. At the same time, many institutions, and particularly community colleges, are slammed for resources. I realize ED does not understand nor particularly care. In cases where ED has legal obligations of its own, or particular agendas it is prioritizing, that approach is at least understandable but here the legal obligation is quite limited and the agenda unclear and piling on seems to be the entire policy thrust, or perhaps in a more generous light "we might want this someday" which I would still argue is not a valid approach to data collection at any time, but certainly not right now. For both the sake of institutions and for ED's own capacity, as a policy matter, it should focus on matters that are either required (FAFSA simplification, a simple method of collecting and applying work-study wages to needs analysis, loan repayment) or more central to its policy goals (Gainful Employment seemingly, commencement of loan repayment, revision of loan plans, etc.). As proposed, ED is leaving itself and its partners stretched perilously thin and for no clear present purpose, in a moment when crucial initiatives and work are underway yet far from complete and successful implementation. Save the proposed template in mind for a future where all parties may have space to think critically about what data may be needed, how it could be collected, how accurate it reasonably can be, and most critically how it could actually be used to justify its collection. In many cases, even when I disagree with ED's approach, I can at least appreciate their motivation. Here it's hard to understand the policy or practical aim, much less its priority in the context of this moment.  
(part 1 of 2)

The burden this will place on financial aid offices is substantial. We are already overworked and underpaid and stretched to thin. The FAFSA simplification act is making everything more complicated, not simpler!

FA offices are faced with considerable staffing shortages, and adding a new process to the mix would require more than the 200 hours allotted. Please consider a more prudent way to collect this data.

ED indicated in its response to one commenter from the 60-day comment period that it plans to align annual student-level FWS reporting with FISAP reporting. We ask that ED give institutions as much additional time as possible in this initial reporting year considering the FAFSA is delayed until December. If ED can align the reporting date with the FISAP, which is due only one day before the typical release of the FAFSA, ED can presumably set this year's deadline to the day before the 2024-25 FAFSA is released. This will provide institutions at least two extra months to prepare for this new reporting requirement.

Even with additional time, low-resourced institutions will struggle to meet this new reporting requirement. Two hundred hours of burden equates to an entire month of one staff member's time. We recommend that ED create an alternative, optional process that permits institutions to manually subtract from individual earnings the amount of prior-year FWS earnings in lieu of reporting earnings via COD, at least during this first year of implementation. Larger institutions may find the COD reporting a less burdensome option and choose to proceed that way, but smaller institutions would likely experience significantly less burden by updating individual records manually in their own systems. We appreciate ED's May 23, 2023, update to the Common Origination and Disbursement (COD) Technical Reference that redesignated several data elements not necessary for compliance with the FAFSA Simplification Act as "for future use only." We remain concerned, however, about the scope of additional data reporting ED proposes, even if only effective in future years. ED was tasked with collecting a single data element — the student's annual federal work-study earnings. We do not believe the Department has authority to collect the additional student-level campus-based aid data it includes in the new Campus Based Record Layout volume of the 2023-24 COD Technical Reference. ED says in its response to one commenter, "The collection of other types of need-based employment is not required under the law," yet ED proposes to collect other FWS data and FSEOG data, all of which are also not required by law. As noted in earlier comments,<sup>2</sup> we remain concerned about the items marked for future use in the 2023-24 COD Technical reference, such as student-level Federal Supplemental Educational

2  
[https://www.nasfaa.org/uploads/documents/NASFAA\\_Federal\\_Work\\_Study\\_Information\\_Collection\\_Comments.pdf](https://www.nasfaa.org/uploads/documents/NASFAA_Federal_Work_Study_Information_Collection_Comments.pdf)

NASFAA July 12, 2023

3 Opportunity Grant (FSEOG) reporting and FWS reporting broken down by federal and institutional share, community service, and job location and development designation, among others. Aside from questions about ED's authority to collect this data and concerns over the associated reporting burden, several items may be impossible to report, such as situations where students have more than one FWS position with different designations. We also have questions about how ED will handle conflicting information between COD and the FISAP with respect to reporting campus-based aid institutional and federal share information. Institutions are not required to track student-level federal and institutional shares and have no

Data elements on the proposed FWS data reporting to Common Origination and Disbursement is an overreach for the required information for calculating the SAI. For large universities reporting data for each required field is overly cumbersome and will result in hours of unnecessary work to gathering all information requested. As the data requested is from two different aid years that could be well over 500 or more students that information will be required for at my university. I anticipated filling out all data fields for each student to take approximately 1-2 hours or more each. If data is collected on 500 or more students at my university that would be between 500-1000 work hours or approximate 12-25 full work days to collect this data each year. This administrative burden will distract from other important financial aid administration and from providing quality service to students.

I would like to respectfully submit comments on ED's proposed information collection on institutional reporting of Federal Work Study (FWS) wages for Student Aid Index (SAI) calculation. I appreciate ED's addition of a new burden estimate to account for initial startup activities for institutions. While 200 hours is daunting, it is critical that ED accurately estimate the time schools will need in order to be ready to report FWS earnings so we can prepare accordingly, especially given the short timeframe for compliance. Understanding the Department has no control over Congress requiring it to collect annual work-study earnings data, I ask that ED commit to helping institutions manage that burden by issuing timely guidance, being responsive to new questions and issues as they arise, and not imposing other burdensome requirements on institutions during this time when we are already overwhelmed with preparing to implement the FAFSA Simplification Act on our campuses. I ask that ED give institutions as much additional time as possible in this initial reporting year considering the FAFSA is delayed until December. If ED can align the reporting date with the FISAP, which is due only one day before the typical release of the FAFSA, ED can presumably set this year's deadline to the day before the 2024-25 FAFSA is released. This will provide institutions at least two extra months to prepare for this new reporting requirement. Even with additional time, low-resourced institutions will struggle to meet this new reporting requirement. Two hundred hours of burden is an entire month of one staff member's time during an historic change to financial aid processing. We appreciate ED's May 23, 2023, update to the COD Technical Reference that redesignated several data elements not necessary for compliance with the FAFSA Simplification Act as "for future use only." I remain concerned, however, about the scope of additional data reporting ED has proposed, even if only effective in future years. ED was tasked with collecting a single data element — the student's annual federal work-study earnings. I don't believe ED has authority to collect the additional student-level data it includes in the new Campus Based Record. ED says in its response to one commenter, "The collection of other types of need-based employment is not required under the law," yet ED proposes to collect other FWS data and FSEOG data, all of which are also not required by law. I remain concerned about the items marked for future use in the 2023-24 COD Technical reference, such as student-level FSEOG reporting and FWS reporting broken down by federal and institutional share, community service, and job location and development designation, among others. Aside from questions about ED's authority to collect this data and concerns over the reporting burden, some items may be impossible to report, such as situations where students have more than one FWS job with different designations. I also wonder how ED will handle conflicting information between COD and the FISAP with respect to reporting campus-based aid institutional and federal share information. We are not required to track studentlevel federal and institutional shares and have no guidance on how to do so. While I am hopeful ED will abandon this effort to collect data it is not required to collect by law, if it pursues this path, it must consider all possible scenarios and ensure this data can be reported accurately.

Hello - with the proposed changes to the FAFSA and the new requirement to report wages, there is no way my institution can complete the reporting with all the requested fields. As mentioned by NAAAFSA, this is a massive burden and we cannot complete this by the deadline due to our capacities at our small college, as well, compliance is a massive issue. The additional burden and so many fields seem unnecessary. My hope is that the required fields will be significantly reduced, and the requirements will be made more clear. Thank you!

As a Financial Aid Administrator, I find the scope of the proposed reporting of Federal Work Study wages to be inefficient and unnecessary. Much of this information is already reported on in the FISAP and it feels extremely intrusive to request/require additional reporting. Specifically, the law from Congress requires that only a student's annual FWS earnings be reported to be accounted for in the SAI calculation. While I entirely agree that using the actual reported funds will be far more accurate than a contributor self-reporting, I have a very difficult time understanding why there are any additional data elements to be reported in COD beyond that one dollar amount. The type of work (community service, location, etc.) performed by the student does not change that dollar amount or therefore their SAI or Pell Grant eligibility and is an unnecessary and large burden on Financial Aid Administrators. The reporting of FSEOG funds is also not required by the law. I must reiterate, this information is already being reported to the Department of Education through other required reporting. If the intent is for this COD reporting to replace the FISAP in the future, I would urge the Department to be forthcoming with this information as soon as possible. Financial Aid Administrators have a tendency to be extremely opposed to duplicated work and inefficient processes as it has been our job to manage intricate funding programs with their rules, regulations, and guidance and have learned to make the most of our valuable time and energy to award aid correctly. If it is not the intent of this proposed process to replace the FISAP, I wholeheartedly disagree with the extent of this reporting and its value to the determination of aid eligibility for our students.

With FAFSA "Simplification", our school already has multiple items to get ready for 24-25. The added burden of reporting FWS - when our school handles FWS funds manually due to a lack of IT support - will probably exceed the estimated 200 hours. This also comes at a time when we are short-staffed and not being able to hire positions for which we previously had approval. The school is apparently limited in the number of full-time employees we can have per our state board. The two positions that had been approved for us were given to other departments, when we couldn't find any legitimate candidates for the salary that we were given. We're also dealing with another person leaving for higher pay elsewhere, and we need to rehire that position. That being said, we all pitch in to cover the extra work, but something needs to give.

While I can understand the desire to have this information uploaded to COD, the proposal to upload this data bi-weekly as opposed to annually is an extreme burden to be placed on schools in my opinion. For years now we, as a financial aid community, have rolled with the punches to function through a pandemic, distribute CARES, HEERF, HEERFII, deal with changing regulations, and this year's nightmare of budgeting loan fees (and then removing them or constantly adjusting to reflect actual fees charged) such that we are constantly presented with ever-higher hurdles to over-come. Please consider moderating this requirement to ideally once per year at award end or at least based on a prior completed term (e.g. upload after fall\spring\summer semesters).

Requiring this reporting will only be yet another burden on our financial aid offices. FAFSA "Simplification" is anything but. Most of the policy of this simplification puts more of a burden on students and parents to submit more docs and become more confused, not to mention on us. People are fleeing this profession in droves because of the non-stop bureaucracy and red tape that is implemented on us more and more, every year, by people who do not do our jobs and don't know how to do our jobs, nor do they care.

Requiring this reporting will only be yet another burden on our financial aid offices. FAFSA "Simplification" is anything but. Most of the policy of this simplification puts more of a burden on students and parents to submit more docs and become more confused, not to mention on us. People are fleeing this profession in droves because of the non-stop bureaucracy and red tape that is implemented on us more and more, every year, by people who do not do our jobs and don't know how to do our jobs, nor do they care.

This will be a significant burden on financial aid professionals (on top of all the other regulatory changes currently happening). The man hours it will take to complete this task has been severely underestimated.



Hello,

It would be very helpful to give as much time as possible to financial aid offices to compile the data necessary for this update in regulations. There is already an unprecedented amount of changes that we will be adjusting for this year, and we need to be pragmatic about this change as we navigate a tight schedule of deadlines this summer and fall.

Thank you,

Please consider moving the initial reporting date back a month or two to allow schools time to implement a process to report FWS earnings. There are so many changes happening right now, we are struggling to find time to prepare for FAFSA simplification. Please keep this process as simple as possible and have schools only report those fields that are required by law. I understand why schools need to report this data but the administrative burden will be significant. I ask that ED does everything in it's power to reduce the burden so we can focus on advising students and awarding aid. Thank you for considering these comments.

Sarah Loepker

Portland Community College

Associate Director of Financial Aid

We are opposed to any regulation that increases the burden and workload of financial aid staff. Please reconsider reporting requirements for the annual federal work study earnings data. Even with additional time, low-resourced institutions will struggle to meet this new reporting requirement. Two hundred hours of burden equates to an entire month of one staff member's time. We recommend that ED create an alternative, optional process that permits institutions to manually subtract from individual earnings the amount of prior-prior year FWS earnings in lieu of reporting earnings via COD, at least during this first year of implementation. Larger institutions may find the COD reporting a less burdensome option and choose to proceed that way, but smaller institutions would likely experience significantly less burden by updating individual records manually in their own systems.

Regarding ED's proposed information collection on institutional reporting of Federal Work Study (FWS) wages for Student Aid Index (SAI) calculation (Docket No.: ED-2023-SCC-0046):

Understanding ED has no control over Congress requiring it to collect annual work-study earnings data from institutions, I ask that ED commit to helping institutions manage that burden by issuing timely guidance, being responsive to new questions and issues as they arise, and not imposing other burdensome requirements on institutions during this time when our office is already overwhelmed with preparing to implement the FAFSA Simplification Act while dealing with staffing issues. ED responded to one commenter from the 60-day comment period that it plans to align annual student-level FWS reporting with FISAP reporting. I request that ED give institutions additional time in this initial reporting year considering the FAFSA is delayed until December. If ED can align the reporting date with the FISAP, ED can presumably set this year's deadline to the day before the 2024-25 FAFSA is released. This will provide us with at least two extra months to prepare for this new reporting requirement and even with additional time, it will likely be a struggle. Two hundred hours of burden equates to 5 weeks of one staff member's time. I recommend that ED create an alternative optional process that permits us to update individual records manually in lieu of reporting earnings via COD, at least during this first year of implementation. I appreciate ED's May 23, 2023, redesignation of several data elements not necessary for compliance with the FAFSA Simplification Act as "for future use only." I am still concerned, however, about the scope of additional data reporting ED proposes, even if only effective in future years. ED was tasked with collecting a single data element — the student's annual federal work-study earnings. I do not believe ED has the authority to collect the additional student-level campus-based aid data it includes in the new Campus Based Record Layout volume of the 2023-24 COD Technical Reference. ED says in its response to one commenter, "The collection of other types of need-based employment is not required under the law," yet ED proposes to collect other FWS data and FSEOG data, all of which are also not required by law. I am concerned about the items marked for future use in the 2023-24 COD Technical reference, such as student-level FSEOG reporting and FWS reporting broken down by federal and institutional share, community service, and job location and development designation, among others. Aside from questions about ED's authority to collect this data and concerns over the associated reporting burden, several items may be impossible to report, such as situations where students have more than one FWS position with different designations. I also have questions about how ED will handle conflicting information between COD and the FISAP with respect to reporting campus-based aid institutional and federal share information. Institutions are not required to track student-level federal and institutional shares and have no guidance on how to do so. Does the Department plan to reconcile these data sources and, if so, how will ED resolve discrepancies it identifies? I am hopeful ED will abandon this effort to collect data it is not required to collect by law.

(part 2 of 2) In the broader view, ED also needs to think critically about administrative burden. While ED is very quick to cite schools' obligation to meet all 'administrative capability' standards, sometimes rightly so, it seems very content over the past decade to just keep expanding the pile of standards without any real reflection on the aggregation or prioritization of elements within the pile. While related to the FISAP in certain ways, and perhaps could one day replace two of the data tables within it, it does not and cannot replace other key parts of the FISAP. So it becomes one more thing in a very large pile. This is relevant because on the one hand ED is happy to criticize at times that schools are too expensive, and yet does not seem to reflect that 200 hours here and 100 hours there, ad infinitum, reflect not just time but very real dollar costs. This 200 hour report, in monetary terms, will cost a typical school \$8,000 - \$10,000 in raw staffing or outsourcing costs. People who can accurately create or navigate very large XML files usually don't come cheap. As with anything else does, if you look only at that one cost in isolation, that may not seem like much, but of course it is the aggregate that matters. And even this piece, for a community college with 800 students, this report may translate to a per student cost of \$10 per student - much more per FWS recipient - or the tuition equivalent of 2-3 students going only to this one cost. Now, if ED could negotiate with Congress an increase to the CB ACA to offset these costs, there would still be a reasonable outcry about capacity and rushed implementation and poor choice of timing. Of course an ACA bump won't happen, so these are just costs being passed on to students either as tuition increases to acquire the staffing to do this, else decreases to other services as we continue to have to shift resources towards reporting/compliance. Looked at through an even broader lens, at some point ED is going to have to think about overhead costs of delivering these programs. While program integrity is important, sure ED would agree that there is some point where the overhead costs of delivering the funds (aside from all the other costs of college) defeat the point. If, hypothetically, delivering FSA funds required \$1 spent on operational overhead to deliver \$1 of aid, we would presumably all agree that was failed public policy. ED, particularly in 3 of the past 4 administrations, has been very comfortable thinking about what it can add. And viewed in isolation, there is at least a good argument for many of these pieces. But there is a deep neglect of viewing of the whole. Wherever that overhead breakpoint is, we're continually moving towards it. If four new pieces need to be added, are there at least three that can be removed or streamlined? "What else?" is a very different question than "What's most important?" As is, over the past 13 years, the pile has grown rapidly both in scale and complexity, which has made a lucrative business for consultants and others working around the FA space, but it has very significant tradeoffs for institutions and students. This report is case in point of ED doing something because it thinks it can, not because it must nor has stopped to address whether it should, and particularly how this piece serves not just itself but the balance of public policy.

understand that institutional reporting of student-level annual FWS wages is statutory, meaning only Congress could lift this requirement; However, I am concerned that ED is seeking to collect significantly more data than it needs to comply with the FAFSA Simplification Act. Fortunately, for the upcoming award year, ED has clarified that it will only seek the data it needs to comply with the law, but I am concerned about future years. This concern is about items marked "For Future Use Only" in the 2023-24 Common Origination and Disbursement (COD) Technical Reference. Those items include a breakdown of individual student FWS earnings by institutional share and federal share, whether the student's job was classified as community service, annual student-level Federal Supplemental Educational Opportunity Grant (FSEOG), and more. This is far more information than is needed to comply with the FAFSA Simplification Act, and will stress the already strained resources at institutions. Every additional administrative burden requirement takes away from the time we have to meet with, and serve, our students as we have to pull resources away from student contact. I encourage ED to only request what is required by the law and not add any additional requirements and refrain from taking any more of our resources away from student contact that is absolutely necessary. I support information outlined in the NASFAA letter attached to my comment.  
Thank you.

believe the request for this information puts an undue burden on the school to add even more information to the already overburdened system. Student earn very little at the university through Federal Work Study. Why does it matter if the information is released for the SAI?

The current question on the FAFSA asks students (and parents) to report their taxable earnings from need-based employment programs. By eliminating this question and requiring schools to only report Federal Work Study earnings, earnings from state and institutional need-based employment programs will no longer be considered in the calculation of the SAI. This is unfortunate. We use funding from state and institutional need-based employment programs to supplement funding from the Federal Work Study program. This allows more needy students to receive the same benefits of working on campus through different programs, yet these students will be hurt on the SAI calculation. Hoping ED will figure out a way to allow schools to report earnings from other need-based employment programs so these needy students are not harmed. Thank you for considering.

The Department should consider streamlining Federal Work Study reporting by mirroring already-existing workflows. Specifically, IHE are already required to report disbursed amounts of Federal Pell Grant and Federal Direct Loans through G5 and the National Student Loan Data System. Certainly, this existing process could be further improved; however consistency is highly valued when it comes to Federal Student Aid processing.

I am writing to express my concerns regarding the administrative burden associated with reporting federal work study wages and the potential collection of additional data in the future. I am concerned about both the scope of the new data collection and ED's method of communicating such a major change to institutional reporting requirements. It is especially troubling that ED has chosen to implement a burdensome new data collection this year, as financial aid offices struggle to implement the broad-ranging provisions of the FAFSA Simplification Act on their campuses in the face of historic staffing shortages. The FAFSA Simplification Act instructs ED to collect Federal Work-Study (FWS) earnings data from institutions to accommodate the loss of this information from the FAFSA, where Congress pared down the list of questions the Secretary may ask of applicants. This single data point removed from the FAFSA now requires schools to submit a report with 95 new data elements. This is also due at the same time as the FISAP which reports Work Study earnings based on the aid year but this report requires reporting on the calendar year. Those are two entirely different reporting requirements. ED should keep this administrative burden to a minimum by only collecting total calendar year wage information in this initial reporting period. Any expansion of this data request should be openly and fully communicated and negotiated with the student financial aid community. Moreover, the prospect of collecting additional data in the future raises concerns about the potential for further administrative complexities. If the reporting process becomes increasingly intricate, it could place even more strain on educational institutions and hinder their ability to effectively manage federal work study programs. This could inadvertently undermine the very purpose of such programs, which is to support students in their pursuit of education and career development. In conclusion, I urge the Department of Education to carefully consider the administrative burden placed on educational institutions when reporting federal work study wages. By implementing more efficient reporting procedures and minimizing additional data requirements, we can strike a balance that benefits both the institutions and the students they serve. Thank you for your attention to this matter.

I'm extremely concerned about the number of hours this data collection is estimated to take colleges, and the short amount of time we're being given to prepare for the first collection round. Our institution is actually considering dropping the FWS program if this estimate is correct. We have a fairly small program, and feel the administrative burden may not be worth the benefit we're seeing to students.

The term "FAFSA Simplification" insinuates that the process will be easier for all affected parties (e.g., students and IHE's). This requirement of making the IHE collect and submit this information is far from "simplification." By removing the FWS earnings question from the FAFSA, ED has now shifted the burden of collecting this information from each of the over 27 million individual filers to a few thousand FA administrators that are already preparing for the major overhaul that will take place in a very short period of time. FAFSA Simplification requires IHE's to reprogram all of their internal processing software, completely revamp P&P's to ensure compliance, learn an entirely new way of understanding the new processes to be truly seen as the "expert" for our students, AND be able to train others to understand the new process in order to advise and guide our students accurately and effectively. All within a very short window of time. Some software providers may make a reporting capability available for the FWS individual earnings information to be uploadable to COD through their software. Many schools, especially the smaller IHE's with limited staffing would be required to manually enter individual earnings information directly into a COD schema. Do not punish the smaller schools that lack the technical support currently available to many of the larger schools. **\*\*SOLUTION\*\*** Build in COD an upload capability (like we have with FISAP) that would help to alleviate the administrative burden that is being placed on schools during a time of high stress caused by the impending changes that are coming in the months ahead. Building one program to help hundreds of schools is a much more efficient process to obtain required information quickly than it is to require these schools to dedicate hundreds of hours toward manual entry. Hours we don't have.

Please allow institutions as much time as possible to comply with the initial year of reporting. We have not been given any guidance on this yet and we do not yet know the full scope of how our systems will need to be configured to provide the data needed to report earnings for. The burden to set this up will be significant at a time when financial aid offices are already overwhelmed preparing for the Fall quarter or semester. In addition, we ask that you only collect data necessary to obtain student earnings needed to determine the Student Aid Index.

Creating the reporting for Student Aid index is a well intentioned thought. However, I think the better approach is to give the institutions the authority to update the field upon the students request. This approach can take place similar to when verifying the 400/401 code. Since the IRS DRT will be forced upon applicants in the future there could be a prompt with a message that asks the applicant if they worked under the FWS program in XYZ year. If the student marks "yes" they can be guided with another prompt that asks them to enter the gross earnings on their W2 from their respective state. If they need help, a message could be in the SAR Comments that directs them to their institution. Otherwise, the work required currently with the FWS program is overwhelming and would only cause more challenges with the SAI. Collecting data can be done after students enter information on their FAFSA. Keep in mind, FWS Coordinators are not only handling the FWS aid program but multiple aid programs. More and more work continues to add on employees who have not been compensated adequately and are asked to do more with less. Please do not do this.

Any information collection request by ED stemming from the removal of FWS income from FAFSA should be limited to the minimum data required to calculate the applicant's student aid index (SAI) and determine their eligibility for certain Title IV aid. The proposed ICR includes numerous superfluous data points and represents an undue burden on already strained financial aid departments. If ED persists with the proposed ICR, redundant data should be removed from FISAP.

Collecting the earnings under the FWS program is important if the need analysis formula should be excluding it when determining eligibility for federal aid. However, taking one question off of the FAFSA and replacing it with a report that requires far more than the earnings information is excessive and unnecessary. The information needed to identify the student who earned the funds and the amount of the funds earned should be limited to Name, SSN, DOB and amount of earnings for the calendar year. That should be sufficient to connect it to a FAFSA that has been filed by the student. Everything else is superfluous. Or the question could be asked on the FAFSA again. It was one question and it impacts the eligibility of the student for federal financial aid. It really belongs on the FAFSA. If adding SEOG awarded to the report means we can stop doing the FISAP, then fine. But the rest of the information is unnecessary. Name. SSN. DOB. FWS amount earned, SEOG awarded. That is all.

Attachment

Attachment

Attachment

Attachment

<b>Comment Date / #</b>	<b>Commenter</b>
071323 - 115706	Aurie Clifford
071323 - 013240	Anonymous
071323 - 010715	Anonymous
071223 - 114829	Amy Whitford
071223 - 103525	Katy Weisenburger
071223 - 090023	Jill Desjean



071223 - 061028	Jasmine Johnson
071123 - 092956	Barbara Grimm
071023 - 095104	Anonymous
071023 - 080539	Kenneth Ferreira
071023 - 073604	Anonymous

071023 - 025155	Calvin Black
070723 - 110930	Anonymous
070723 - 083205	Karen Belling

070623 - 124145	Peter Goss
070623 - 120640	Anonymous
070623 - 112804	Brent Thomas

070623 - 112757	Joshua Morey
070623 - 105328	Anonymous

070623 - 104630	Anonymous
070623 - 092110	Anonymous

070623 - 092103	Anonymous
070623 - 085607	Anonymous
070623 - 084336	Ellen Nystrom
070623 - 083838	Evan Weiler
070623 - 083657	Evan Weiler
070623 - 083529	Anonymous

070623 - 083122	Mark Messingschlag
070623 - 044618	Sarah M Loepker
070623 - 041010	Melissa Hill

070623 - 030212	Natalie Wilkins
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070623 - 012856	Peter Goss
062223 - 104215	Brad Barnett
062023 - 125633	Judy Cuellar

061923 - 120939	Anonymous
061623 - 035158	Anonymous
061623 - 012644	Kelley Christianson
061423 - 092421	Anonymous

061423 - 032605	Anthony Tanking
061423 - 013852	Anonymous
061323 - 042106	Anonymous
061323 - 115450	Craig Schultz

061323 - 122439	Anonymous
070623 -	Mr. R. Kim Jenerette
071223 -	NASFAA
071223 -	Ginny Kopko

071223 -

Noel L Whearty

**FSA response**

Thank you for your comment. We recognize these challenges associated with collecting and reporting this data and have therefore estimated the burden hours accordingly. Reporting of FWS wages for the calendar year will only be required once annually, and not on a more frequent basis. For additional reporting guidance, refer to the Electronic Announcement posted July 21, 2023.

Thank you for your comment.

Thank you for your comment. While we recognize the challenges associated with fulfilling this new reporting requirement, we anticipate that the timeline communicated in the most recent July 21, 2023 Electronic Announcement will afford most institutions sufficient time. Collection of Federal Work Study earnings by the Department for use in the Student Aid Index (SAI) calculation is a requirement of the FAFSA Simplification Act, therefore no such alternative reporting options may be extended to institutions at this time.

Thank you for your comment. While we recognize the challenges associated with fulfilling this new reporting requirement, we anticipate that the timeline communicated in the most recent July 21, 2023 Electronic Announcement will afford most institutions sufficient time. Collection of Federal Work Study earnings by the Department for use in the Student Aid Index (SAI) calculation is a requirement of the FAFSA Simplification Act, therefore no such alternative reporting options may be extended to institutions at this time.

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See response to NASFAA below.

Thank you for your comment. For the latest reporting guidance and timeline information for this data collection, please see the Electronic Announcement posted July 21, 2023. While we recognize the challenges associated with fulfilling this new reporting requirement, we anticipate that the timeline will afford most institutions sufficient time. To account for other types of need-based earnings which were not accounted for under the FAFSA Simplification Act, institutions may, on a case-by-case basis, utilize their professional judgement capacity in order to adequately reflect an applicant's ability to contribute toward their educational expenses. Please reference the Department's full guidance on the changes to professional judgment that are effective with the 2023-24 Award Year in GEN-22-15.

Thank you for your comment. While we recognize the challenges associated with fulfilling this new reporting requirement, we are bound to implement the law as mandated by the FAFSA Simplification Act. Student-level FWS wages cannot be garnered from the information that is currently collected on the Fiscal Operations Report.

Thank you for your comment. For the latest reporting guidance and timeline information for this data collection, please see the Electronic Announcement posted July 21, 2023.

Thank you for your comment. While we recognize the challenges associated with fulfilling this new reporting requirement, we are bound to implement the law as mandated by the FAFSA Simplification Act.

Thank you for your comment. For the latest reporting guidance and timeline information for this data collection, please see the Electronic Announcement posted July 21, 2023.

Thank you for your comment. While the Campus Based schema is being built with consideration for possible future data needs, no information is being requested as part of this collection that is not required under the FAFSA Simplification Act or for the purposes 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>), as well as the recent July 21, 2023 Electronic Announcement that contains additional reporting guidance.

Thank you for your comment. While we recognize the challenges associated with fulfilling this new reporting requirement, we are bound to implement the law as mandated by the FAFSA Simplification Act.

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See NASFAA response

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Thank you for your comment. While we recognize the challenges associated with fulfilling this new reporting requirement, we are bound to implement the law as mandated by the FAFSA Simplification Act.

Thank you for your comment. Reporting of FWS wages for the calendar year will only be required once annually, and not on a more frequent basis. For additional reporting guidance, refer to the Electronic Announcement posted July 21, 2023.

Thank you for your comment. While we recognize the challenges associated with fulfilling this new reporting requirement, we are bound to implement the law as mandated by the FAFSA Simplification Act.

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Thank you for your comment. For the most recent reporting guidance and timeline information, refer to the Electronic Announcement posted July 21, 2023. While we recognize the challenges associated with fulfilling this new reporting requirement, we hope that the time allotted for completion will be sufficient.

Thank you for your comment. While we recognize the challenges associated with fulfilling this new reporting requirement, we anticipate that the timeline communicated in the most recent July 21, 2023 Electronic Announcement will afford most institutions sufficient time. Additionally, no information is being requested as part of this collection that is not required under the FAFSA Simplification Act or for the purposes of matching student records in the COD System and the FAFSA Processing System.

Thank you for your comment. While we recognize the challenges associated with fulfilling this new reporting requirement, we anticipate that the timeline communicated in the most recent July 21, 2023 Electronic Announcement will afford most institutions sufficient time. As the FAFSA Simplification Act requires that the Department collect Federal Work Study earnings for use in the Student Aid Index (SAI) calculation, no such alternative reporting options may be extended at this time.

Thank you for your comment. While the Campus Based schema is being built with consideration for possible future data needs, no information is being requested as part of this collection that is not required under the FAFSA Simplification Act or for the purposes 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>), as well as the recent July 21, 2023 Electronic Announcement that contains additional reporting guidance and timeline information.

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Thank you for your comment. While we recognize the challenges associated with fulfilling this new reporting requirement, we are bound to implement the law as mandated by the FAFSA Simplification Act.

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 scheduled 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. To account for other types of need-based earnings which were not accounted for under the FAFSA Simplification Act, institutions may, on a case-by-case basis, utilize their professional judgement capacity in order to adequately reflect an applicant's ability to contribute toward their educational expenses. Please reference the Department's full guidance on the changes to professional judgment that are effective with the 2023-24 Award Year in GEN-22-15.

Thank you for your comment. The reporting mechanisms being built into the Common Origination and Disbursement (COD) System to allow institutions to report Federal Work Study wages were designed to closely resemble and function as those already in place for the other Title IV programs.

Thank you for your comment. While the Campus Based schema is being built with consideration for possible future data needs, no information is being requested as part of this collection that is not required under the FAFSA Simplification Act or for the purposes 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>), as well as the recent July 21, 2023 Electronic Announcement that contains additional reporting guidance.

Thank you for your comment. The estimated burden hours are intended to reflect the time for both collection and submission of the data, and are expected to be variable depending on the institution. For the latest reporting guidance and timeline information, please see the Electronic Announcement posted on July 21, 2023.



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. While we recognize the challenges associated with fulfilling this new reporting requirement, we are bound to implement the law as mandated by the FAFSA Simplification Act.

Thank you for your comment. For implementation guidance, 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>), as well as the recent Electronic Announcement posted July 21, 2023. While we recognize the challenges associated with fulfilling this new reporting requirement, we anticipate that the timeline communicated will afford most institutions sufficient time.

Thank you for your comment. Collection of Federal Work Study earnings by the Department for use in the Student Aid Index (SAI) calculation is a requirement of the FAFSA Simplification Act, therefore no such alternative reporting options may be extended to institutions at this time. For additional reporting guidance, refer to the Electronic Announcement posted July 21, 2023.

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Thank you for your comment. While we recognize the challenges associated with fulfilling this new reporting requirement, we anticipate that the timeline communicated in the most recent July 21, 2023 Electronic Announcement will afford most institutions sufficient time. Given that the collection of Federal Work Study earnings by the Department for use in the Student Aid Index (SAI) calculation is a requirement of the FAFSA Simplification Act, no such alternative reporting options (outside of the COD System) may be extended to institutions at this time. Finally, while the Campus Based schema is being built with consideration for possible future data needs, no information is being requested as part of this collection that is not required under the FAFSA Simplification Act or for the purposes of matching student records in the COD System and the FAFSA Processing System.

Thank you for your comments. As communicated in the most recent July 21, 2023 Electronic Announcement, institutions are encouraged to report individual FWS wage data to COD timely and in advance of the December release of the 2024-25 FAFSA, so as to minimize instances of inaccurate initial SAI calculations and ISIR corrections.

Given that the collection of Federal Work Study earnings by the Department for use in the Student Aid Index (SAI) calculation is a requirement of the FAFSA Simplification Act, no such alternative reporting options (outside of the COD System) may be extended to institutions at this time.

With respect to items that were built into the Campus-Based Schema but labeled as "future use", as communicated previously, the Department has no plans to collect such data at this time. Should any portion of these fields be implemented for use in the future, the Department will not implement such changes without just cause and advanced communication to the school community. Additionally, the Department has no intentions of requiring any form of duplicative reporting for the Campus-Based programs.

Thank you for your comment. While we recognize the challenges associated with fulfilling this new reporting requirement, we anticipate that the timeline communicated in the most recent July 21, 2023 Electronic Announcement will afford most institutions sufficient time. Given that the collection of Federal Work Study earnings by the Department for use in the Student Aid Index (SAI) calculation is a requirement of the FAFSA Simplification Act, no such alternative reporting options (outside of the COD System) may be extended to institutions at this time. Finally, while the Campus Based schema is being built with consideration for possible future data needs, no information is being requested as part of this collection that is not required under the FAFSA Simplification Act or for the purposes of matching student records in the COD System and the FAFSA Processing System.

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