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Manager of the Strategic Collections and Clearance Governance and Strategy Division  
U.S. Department of Education  
400 Maryland Ave. SW  
LBJ, Room 6W203  
Washington, DC 20202-8240

Docket ID ED–2023–SCC–0046

To whom it may concern:

On behalf of the National Association of Student Financial Aid Administrators (NASFAA), we respectfully submit to the U.S. Department of Education (ED) our comments on ED’s proposed Federal Work-Study (FWS) Wages for Student Aid Index Information Collection (Docket ID ED–2023–SCC–0046).

NASFAA’s membership consists of more than 29,000 financial aid professionals at nearly 3,000 colleges, universities, and career schools across the country. NASFAA member institutions serve nine out of every 10 undergraduates in the United States.

NASFAA is 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<sup>1</sup>.

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.

***To account for this single missing data point from the FAFSA, ED has drafted an entirely***

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<sup>1</sup>[https://www.nasfaa.org/uploads/documents/Financial\\_Aid\\_Offices\\_Face\\_Intensifying\\_Staffing\\_Challenges\\_Amid\\_Pandemic.pdf](https://www.nasfaa.org/uploads/documents/Financial_Aid_Offices_Face_Intensifying_Staffing_Challenges_Amid_Pandemic.pdf)

***new, 45-page volume of the Common Origination and Disbursement (COD) Technical Reference, with 95 new data elements listed for institutions to report.***

***Can we pause to consider that trade-off for a moment?***

ED's four-hour burden estimate for this data collection is woefully inadequate to account for all of the information it expects institutions to pull from different campus sources, not to mention the information technology resources necessary to compile them into a single file to submit to COD.

Equally troubling as ED's decision to collect this massive trove of information is the manner in which it communicated this information. ED has consistently referred only to adding individual student work-study earnings to the information institutions must provide to COD. ED's slide deck from its COD System session at the 2022 Federal Student Aid Training Conference (FSATC) refers only to "a new CB schema... is being built in the COD system to accommodate ***reporting of FWS data, to include their total earnings*** for the calendar year and student identifiers."

Similarly, the *Federal Register* notice and supporting statements for this data collection refer only to the collection of work-study earnings data for Student Aid Index (SAI) calculation purposes. It is only after sifting through the supporting documents of this information collection request that one finds the attached 2023-24 COD Technical Reference with the new chapter for reporting campus-based aid data, where the scope of the information collection is finally made clear. Even ED's March 1, 2023 Electronic Announcement (ID COD-23-01), where the new COD Technical Reference volume was first posted, says only, "(f)or this update, we added Volume 4," a remarkable understatement considering the contents of Volume 4.

The addition of Federal Supplemental Educational Opportunity Grant (FSEOG) data to the FWS reporting also comes as a surprise since ED's only apparent mention of collecting new FSEOG data was in the Q&A section of an FSATC presentation. Understanding this is flagged for future use, as is some of the FWS data, changes as significant as these must be announced more prominently than as part of a technical guide release.

Regardless of ED's intent, when information is shared in this way it erodes trust at a time when financial aid administrators need to know that ED is working with them to implement the FAFSA Simplification Act.

While we understand mistakes happen, this data collection — issued so soon after the recently-released FAFSA Specifications Guide, where financial aid administrators had to sift through 190 pages of record layouts to discover the housing question will no longer appear on the FAFSA — is more indicative of a pattern of poor communication than of a single lapse.

We are especially concerned about the items flagged for future use since the technical reference is for 2023-24, meaning “future use” could mean as early as 2024-25. Given we are less than one year from the 2024-25 FAFSA release, this gives institutions very little lead time to prepare for the data collection. With no information provided about FSEOG data, we are completely in the dark as to whether ED would be collecting prior-prior year amounts as with the FWS earnings, or if ED would expect schools to begin reporting current year FSEOG disbursements the way they report Pell Grants and Direct Loans.

Now more than ever, as financial aid administrators prepare for the biggest changes to the federal student aid programs in decades, ED must keep additional burden to a minimum. ED must revisit this significant additional data collection and only require schools to report the data ED absolutely needs: FWS earnings for the prior-prior calendar year. We also remind ED that it must improve communications, both to ensure financial aid administrators are prepared for upcoming changes, and to restore faith in our partnership.

We appreciate the opportunity to comment on this proposed information collection. If you have any questions regarding these comments, please contact me or NASFAA Senior Policy Analyst Jill Desjean at [desjeanj@nasfaa.org](mailto:desjeanj@nasfaa.org).

Regards,



Justin Draeger, President & CEO