



July 12, 2023

U.S. Department of Education  
PRA Coordinator, Strategic Collections and Clearance  
Governance and Strategy Division  
Office of Chief Data Officer  
Office of Planning, Evaluation and Policy Development

Docket No.: 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 information collection on institutional reporting of Federal Work-Study (FWS) wages for Student Aid Index (SAI) calculation (Docket No.: 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 appreciates ED's addition of a new burden estimate to account for startup activities for institutions to begin reporting student-level FWS wages. While 200 hours is a daunting burden, it is nevertheless critical that ED accurately estimate the time institutions will need in order to be ready to report FWS earnings so they can prepare accordingly, especially given the short timeframe for compliance.

Understanding the Department has no control over the new statutory requirement to collect individual annual work-study earnings data from institutions, we ask ED to 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 financial aid offices are already overwhelmed with preparing to implement the FAFSA Simplification Act on their campuses while dealing with historically low staffing levels<sup>1</sup>.

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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)

ED indicated in its response to one commenter from the 60-day comment period that it plans to align annual student-level annual 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 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 Federal Supplemental Educational Opportunity Grant (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 FSEOG reporting and FWS reporting

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

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 share contributions 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? While we are 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 schools are able to report this data accurately.

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