# **Federal Work-Study Program**



# Student Financial Aid On-Campus Manual

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# **FEDERAL WORK-STUDY MANUAL**

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# WHAT IS FEDERAL WORK-STUDY?

Federal Work-Study (FWS) is a need-based, federal financial aid program. Participating institutions are allocated FWS funding annually by the Department of Education.

FWS provides part time jobs for students with financial need, allowing them to earn money to help pay for educational expenses. FWS encourages community service work and work related to a student's course of study.

Student Financial Aid (SFA) is responsible for administering the FWS program.

**From an employer's perspective:** FWS is a source of funding to pay student employees who are eligible for the program. Although it is a benefit to have this supplementary funding, it requires additional work to administer and comply with Student Financial Aid's requirements to verify eligibility and track employment.

Information on the federal and institutional regulations regarding FWS can be found in the Addendum on page 20 of this manual.

**From the student's perspective:** FWS is a form of financial aid that can be used for indirect educational costs incurred while enrolled in school. The program encourages community service work and employment related to their course of study. In some cases, participation opens job opportunities that would not otherwise exist outside of the program, exposing participants to professional options they may not have considered before. Because FWS hours are limited to 20 per week, this form of employment is easier to manage while taking a full course load.

#### **HOW DOES FEDERAL WORK-STUDY WORK?**

- Eligible students are provided with a FWS offer as part of their annual financial aid package
- Employer creates FWS-specific positions with Human Resources within the Workday system
- Student Financial Aid reviews each FWS position when it is created and sets a target hiring pay range corresponding to the job description and qualifications for the job
- Eligible students seek and apply for FWS jobs in Workday
- Employer's Talent Acquisitions (TA) staff verifies student eligibility and supports the completion of employment paperwork
- Student works for employer
- Employer pays student biweekly, as the payroll system uses FWS worktags associated with the position to draw on the federal funds to offset employment costs
- Student receives payment
- Student Financial Aid monitors payments, usage and balances
- Employer monitors students' balances using the Federal Work-Study Status Report in Workday after each pay cycle

# CREATING FEDERAL WORK-STUDY JOBS

Creating FWS positions is a team effort between the employing department, the Human Resources Consultant (HRC) for the unit, Student Financial Aid (SFA), the unit's Talent Acquisitions team, and the unit's Cost Center Managers.

In order for FWS funding to function correctly in Workday, **both the student and the position** need to be FWS eligible.

Positions can only be FWS eligible if they have been vetted by Student Financial Aid as part of the job requisition process in Workday. It is important to ensure FWS positions are created correctly in the system.

FWS position descriptions (PDs) and job posts require complete job descriptions and qualifications for compliance purposes and accurate Job Profile review. Based on this information, Student Financial Aid ensures the correct Job Profile and target hiring range have been assigned in Workday. Student Financial Aid also assigns community service designations if applicable for reporting purposes.

#### FWS position process overview:

**Step One:** Draft a PD and discuss with your HRC. Appropriate job profiles for FWS positions are Student Assistant 1-3 only. To counsel the Manager/Manager Liaison in creating their PD, the HRC should use the descriptions within the Student Classification Salary Structure provided by Compensation to guide departments on appropriate job profiles as they relate to target hiring ranges for student jobs. A copy of the Student Classification Salary Structure for Student Assistant positions can be found on page 24 at the end of this manual, and are also located in the OSU Job Catalog in Workday.

**Step Two:** The Manager/Manager Liaison creates the job requisition in Workday using the job aids available in the <u>Administrative Resource Center</u> (<a href="https://admin.resources.osu.edu/workday/workday-for-core-users-human-resources/federal-work-study">https://admin.resources.osu.edu/workday/workday-for-core-users-human-resources/federal-work-study</a>).

The required FWS-specific components on the job requisition include:

- Job Profile Student Assistant 1 3 used matches the job description and qualifications per the Student Classification Salary Structure.
- **Job Title** cannot contain references of any kind to FWS. Job titles are viewable in People search results, and public references to need based aid in the context of student-specific directory information are a FERPA violation.
- Detailed job description and qualifications for the job. Qualifications should relate to
  the job duties and skillsets for the position. The presence of FWS funding, a HS
  diploma/GED, or schedule availability cannot be the only qualifications listed. If no
  qualifications are required and on-the-job training is provided, this should be listed
  along with the job qualifications.

- If the position is **FWS-only**, include that in bold typeface in the Additional Job Description field. This tells both the students and the TA that having a FWS offer is a job qualification.
- In the Costing section on the requisition, check the first Federal Work Study (FWS) box. This is what causes requisitions to flow in Workday for Student Financial Aid review and adds the first FWS worktag to the position. Neglecting to check this box will render the requisition ineligible for the program and cannot be added to the position later.

Once submitted, the unit's HRC will review the requisition first for items specific to the unit and to ensure the FWS components listed above are present.

Then the requisition flows to Student Financial Aid for review. If the requisition is complete and the job description matches the job profile that was used, Student Financial Aid assigns a community service designation worktag to the position, notates the appropriate target hire range in the comment section, and approves the position.

Once approved, the requisition then flows to the unit's TA for posting, and they will walk the Manager/Manager Liaison through the rest of the recruit-to-hire process.

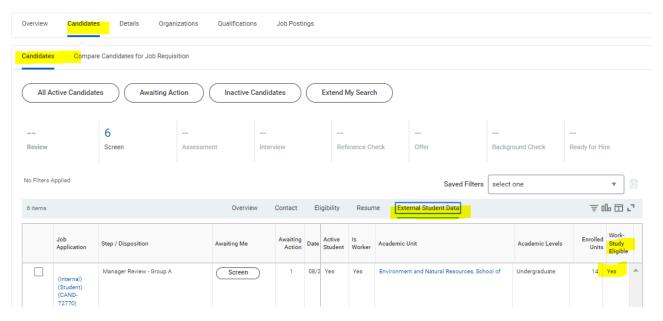
It is the expectation of Student Financial Aid that TA's work closely with their units to post FWS-only positions to the appropriate job board within Workday. **Neglecting to do so will result in an applicant pool of candidates who do not possess FWS funding.** 

# THE HIRING PROCESS

1. The student submits an application in the Workday system to apply for the job. For FWS-only positions, the TA reviews candidates that have the FWS Eligible box checked on the Candidate Grid, and forwards only those applications to the Hiring Manager, who then schedules interviews. If the department is hiring both FWS and regular wage students on the same job requisition, the TA should discuss with the Manager how to best identify those with FWS to aid them with prioritizing who the Hiring Manger chooses to interview.

**Per FERPA,** only the student may confirm the presence and amount of work-study funding at the prehire stage.

a. **Hiring Managers can also see the FWS Eligible box** in their own view of the candidate grid. **Recruit** > choose the **job requisition** > **Candidates** > **External Student Data** 



- 2. Student interviews for the position. Interviewers for FWS-only positions should request that the student provide verification that they have accepted FWS funding for the year, and a copy of their class schedule to confirm half time enrollment and availability. Per FERPA, only the student may confirm the presence and amount of work-study funding at the pre-hire stage. The interviewer confirms the student has the qualifications for the specific job as indicated on the job requisition and will be able to work the required days and hours.
- 3. **Initiate the hiring process.** The hiring process is the same for FWS and regular wage students.
- 4. An additional final step for non-revenue generating units: Upon hire, Cost Center Managers for non-revenue generating units eligible for the <u>FWS Program Match add program codes</u> to the student's default costing allocation. There is no automated function alerting them to take this action. The unit should discuss the appropriate protocol to alert the Cost Center Manager to take this action prior to the student being scheduled to work.
- 5. **Once the student is hired**, they must complete all necessary employment forms with the department payroll including:
  - Form W-4, Employee's Withholding Allowance Certificate (Form 5225);
  - Personal Data Record--PDR (Form 8709);
  - OPERS Request for Optional Exemption (Form F-3);

- Employment Eligibility Verification (Form I-9).
- Optional: Many departments require all employees complete forms and/or online trainings agreeing to comply with established codes of responsibility for security and confidentiality. These forms/training are usually department specific.
- If the employing unit's approved background check program applies to student employees, then they must undergo the specified background check(s) in accordance with the Self Disclosure of Criminal Convictions and Background Check Policy, 4.15. This fee will be covered by the employing department and should not be passed on to the student.

If supervisors schedule students to work without the requisite payroll forms, the students cannot be paid from FWS funding.

**Federal guidelines prohibit students from working during scheduled class periods.** This includes online courses. The hiring department should request a copy of each student's class schedule so that work schedules can be arranged. Do not allow students to work "whenever they want." Set specific hours for students to work. If a student reports for work early or stays late because a class has been cancelled, you must document that in the comment section on the timesheet.

The end of the academic year: The financial aid year begins the first day of summer semester and ends the last day of spring semester. FWS funds for each student are not guaranteed per year. It is at the discretion of the individual unit to determine if their FWS-only positions require termination at the end of spring and rehiring in summer/autumn.

Failure to check for a valid FWS offer at the beginning of an academic year and/or not monitoring a student's FWS balance after payroll processing could result in the student being paid from department funds for a significant amount of time and is not considered an extenuating circumstance for FWS backpay requests.

**All employment documents for students working on FWS should be kept for four years** from the last date of the academic year the student worked for your department. Student Financial Aid may request these documents for internal or external auditing of the FWS fund.

# SUPERVISING STUDENT EMPLOYEES

Departments are responsible for ensuring FWS employees are adequately supervised. Each student should be assigned to a permanent supervisor. When a student's regular supervisor is not available, an alternate should be designated and the student informed. It is primarily the supervisor's responsibility to ensure that time-keeping records are accurate and submitted on time for payment each pay period.

Supervisors must ensure students are doing the work indicated in their job descriptions and verifying that time worked is properly documented. Accommodations for telework options are acceptable, however supervisory expectations should be documented and communicated with the student before allowing them to work off-site.

#### **Documentation of work**

- An electronic record of actual time worked must be kept on a timesheet or timecard. Workday
  time tracking documents can be used to meet this requirement. You are responsible for
  maintaining these records for four years following the end of the academic year the student was
  employed with you.
- 2. Times noted on timesheets must be for the exact time worked with a.m. and p.m. hours noted. If an unpaid meal break is included in the shift, this should also be included on the timesheet.
- Supervisors must approve a student's time worked in Workday or equivalent time-keeping system. The supervisor verifies by approving on the timesheet that the student worked the hours indicated, that the work was satisfactory and that all information on the timesheet is correct.
- 4. Students cannot work hours in one pay period with the understanding that they will be submitted for payment in a succeeding pay period, regardless of how willing students are to accept such arrangements.
- 5. If students must work outside the employer's normal business hours, an explicit plan must be in place for supervising and monitoring the hours and levels of performance of these students.
- 6. Students are prohibited by federal guidelines to work at times when their classes are scheduled, this includes online classes.
- 7. Each department is responsible for ensuring that timesheets are accurate and on time each week. The expectation is that supervisors are following up with students who habitually submit time late or inaccurately.
- 8. The payroll system is designed to utilize FWS funds for hours worked for the current and prior pay period in which the time is approved. Timesheets submitted/approved for hours worked further back in time than one pay period are not eligible for FWS usage and will be charged to the department.

#### **Additional considerations**

Departments should only hire the appropriate number of students needed to meet the work needs of the area.

**Per program regulations,** FWS students must be working within their written job descriptions at all times. Do not assign a student to work in a different area or to do tasks other than those described in the original job description.

Departments are encouraged to conduct evaluations of students. Periodic evaluations are a tool for continuing development of the student employees.

Supervisory personnel have the final say about retaining or terminating students. If you have questions, please contact Student Financial Aid at <a href="mailto:sfa-jobs@osu.edu">sfa-jobs@osu.edu</a>. Warnings and terminations should always be documented in writing as well as spoken. Additional information can be found on page 15 of this manual.

# **WORK-STUDY ELIGIBLITY INDICATOR**

To keep business processes used by Talent Acquisition Recruiters, Time Tracking, and Payroll up to date on the work-study amounts and eligibility for individual students, a Work-Study Eligibility Indicator is used. PeopleSoft is the source of this FERPA protected financial aid eligibility information, which is then used to populate a field in Workday called External Student. External Student in turn informs a FWS Eligibility indicator flag in Workday. This indicator can be found on the worker's profile and on candidate application grids. It will be checked Yes if FWS eligible or blank if not.

The indicator is refreshed nightly when the External Student integration is run from PeopleSoft to Workday. The value of the eligibility flag is based on an Eligibility Determination process that is run nightly in PeopleSoft. The field in PeopleSoft is effective dated and is keyed off the student's employee ID (EMPLID) and the Financial Aid Year; however, the External Student Business Object in WD is not effective dated. This means that the Work-Study Eligibility Indicator field in Workday represents the last eligibility that was calculated in PeopleSoft the day prior.

#### The eligibility checks performed:

- Presence of an accepted FWS offer (Y/N)
- Meets minimum hours of enrollment for current semester/term (Y/N)
- Student status (i.e., active, dismissed, etc.) (Y/N)
- Outstanding verification processes (Y/N)
- Satisfactory Academic Progress status (Y/N)

A positive FWS indicator means that the student met these requirements the day prior. A blank indicator means the student failed at least one of these eligibility checks.

**Timing Issues:** Since the Work-Study Eligibility indicator in Workday is not effective dated and history of data changes are not visible in Workday, there are some isolated issues which can arise as Workday is processing FWS through Time Tracking and Payroll. The most common issue is when a student either loses FWS Eligibility after they have worked but before their time is entered/approved in the Time Tracking system, or they lose eligibility between when their time is entered or approved but before the final Payroll calculations are completed. In both situations legitimate FWS hours may be paid with departmental funds. When this happens, the error can be corrected via journal transfer.

Additional eligibility checks are built into the Time Tracking system in Workday. Both the approving supervisor and student would receive an alert if the hours submitted exceed 20 hours per week and/or exceed the remaining FWS balance the student has available. The overall FWS amount and balance information available in time tracking is based on the biweekly payroll process; indicators reflect the eligibility, award amount and balance of the most recent payroll activity, therefore may be one pay period or more behind. While these features are helpful when managing students, we encourage

departments operating under very tight budgetary constraints to keep their own usage records.

In cases where the student has not been through the payroll process yet or a new academic year has just begun, the time tracking system does not yet contain any FWS amount or balance information for that student. **As a result, it will display a low-balance alert in error.** This will resolve itself once the student has been through one pay cycle.

# **CHANGES IN ELIGIBILITY TO EARN WORK-STUDY FUNDS**

There are some common scenarios that render your student employee ineligible for FWS funding after hire, and you will need to decide whether you can continue to employ them on departmental funds, or if you will need to end the employment relationship. Often, this is the result of some change in the student's enrollment or financial aid eligibility that you would not know about until the student or our office notifies you.

These are some of the common reasons why an employee's FWS Eligibility indicator in External Student may change from Yes to No:

- Enrollment has changed to less than half-time (below 6 credit-hours for undergraduates, 4 credit-hours for graduate students.)
- Has earned all FWS funds and has no remaining eligibility.
- Initial FWS offer was reduced or cancelled due to other aid received.
- A change in other financial aid components resulted in decreased FWS eligibility.
- Not met or is not meeting the university's Satisfactory Academic Progress standards for financial aid eligibility (SAP.)
- Owes a refund to a federal grant program or is in default on a federal loan.
- Has graduated\*.
- Has been academically dismissed\*.
- Withdrawn from school for the semester\*.

It is at the discretion of the unit whether to continue to employ a student who is no longer eligible for work-study and pay them with departmental funds instead. In cases where the student has experienced a significant change to their student status such as those indicated with an asterisk above, please discuss this with your HRC.

The <u>Federal Work Study Status Report</u> is the best way to monitor the student's overall FWS amount and resulting balance after each pay cycle. Student Financial Aid can provide general feedback to supervisors in cases where a student's FWS offer has changed or is not reducing as expected. Additional FERPA-protected details can be provided to your student employee.

# **FWS TIME TRACKING AND PAYROLL**

The following chapter is intended as a high-level overview and complement to the detailed process information available in the Administrative Resource Center (ARC). The <u>ARC job aid</u> is intended for Finance staff, but is useful for anyone tasked with administering the program as it covers the following:

- Federal Work Study Program requirements
- Reviews the logic used in Workday time tracking to determine which hours are considered Federal Work Study (FWS) hours; and
- Provides details on how to accurately fund and receive the allotted Federal Work-Study subsidy from Student Financial Aid.

FWS students are paid on the biweekly payroll through Workday. The official calendar can be found at <a href="https://busfin.osu.edu/buy-schedule-travel/payroll/paydate-schedule">https://busfin.osu.edu/buy-schedule-travel/payroll/paydate-schedule</a>. Because supervisors and students receive <a href="mailto:estimated">estimated</a> information about near-future FWS usage prior to payroll processing, it is useful to understand how this functions in time tracking.

Workday time tracking calculates time dynamically each time your student records a block of time into the system. The time tracking system will add a FWS eligible tag to the time block based on the student's eligibility on the day they entered the time. That tag is then used by Payroll to determine what hours should be paid with work-study.

Workday time tracking runs a series of background calculations to determine FWS eligibility prior to the hours being submitted to payroll.

- 1. It first checks if the time is for the current or previous pay period.
- 2. is the student FWS-eligible.
- 3. and is the **position FWS-eligible** (also referred to in ARC job aids as a FWS Funding custom organization).

The student's submitted time must meet all three of these criteria in order to be tagged as FWS.

Managers/Liaisons can view which time calculations tags have been applied to the a given time block by <u>navigating to the worker's time calendar</u> prior to submission so that they are aware ahead of time whether the hours are FWS eligible. This information can also be reviewed during the timesheet approval process located in the supervisor's inbox by scrolling to the bottom of the student's time block record.

#### Students holding multiple positions

Students holding multiple positions will have a drop-down Positions menu in the Details box as they enter time. This is how the student notates which hours are applicable per position, and why being thoughtful about job titles is important.

FWS students may work up to 20 hours per week combined across all eligible FWS jobs. Once a student records 20 hours, the time tracking system will replace the FWS time calculation tag on all subsequent hours with a regular student wage tag. The 20-hour mark is determined chronologically, meaning the first 20 hours worked in the week will be tagged as FWS first, regardless of which position they are for.

#### **Monitoring FWS usage**

Payroll information on each student paid from the FWS account is posted to the student's financial aid record on the Student Information System (SIS) approximately one week after payroll is processed in Workday (typically the Thursday prior to pay day.) This information allows Student Financial Aid to monitor allocation usage per pay period, per student. Student Financial Aid is required by federal regulation to monitor student eligibility for FWS funds.

Those with Manager/Manager Liaison roles, and some Fiscal staff with the additional FWS Specialist security role can retrieve the Federal Work Study Status Report in Workday the Thursday prior to the pay date for the pay period. This report displays the total offer amount, how much each student has earned to date and how much they have left to earn. The report flags students who are at risk of running out of funding so that Managers can take action to request additional FWS funds, explore other departmental funding options, or terminate the student before earning more than their offered FWS amounts. Supervisors and/or Managers are encouraged to contact Student Financial Aid before terminating a student who has run out of funds. We are sometimes able to offer additional funds later in the year. More information regarding the report, requesting access, and initiating FWS Specialist security role access can be found on the Federal Work Study Status Report job aid.

FWS payroll monitoring occurs *during* payroll processing. When payroll is processed, any charges to the FWS fund/spend category for which the student is ineligible will be automatically charged to the department's general funds or default costing allocation assignments as entered by fiscal staff when the student was hired.

#### FWS post-payroll monitoring and reconciliation

After payroll processes are complete, Fiscal staff may check FWS usage via General Ledger validation. Once Payroll has posted, fiscal staff check the General Ledger to verify student Federal Work Study eligibility. Detailed information on this process can be found on the ARC:

https://admin.resources.osu.edu/workday/workday-for-core-users-finance/federal-work-study

Fiscal staff may run Workday sources and uses reports to identify FWS student employees who were paid with departmental funds (SC10030). Reasons why FWS students may have been paid with departmental funds:

- The student has earned their award in its entirety. This is indicated by the pay component –
   Student Enrolled O.
- The position is not marked as Federal Work Study eligible on the worker's organization assignment. If a "Federal Work Study (FWS) Eligible job" field is blank on the organization assignment, it means the position is missing a FWS worktag designated by Student Financial Aid during the job creation process and cannot be used to pay the student.

- Hours exceeded 20 hours in a week. If any single week of time exceeds 20 hours, the excess of 20 hours would be charged to Student Enrolled (SC10030)
- The student has corrections on time submitted that were retroactive and the earnings are
  greater than one pay period behind. In this scenario, earnings are considered ineligible for
  Federal Work Study and would be charged to Student Enrolled (SC10030).
- If none of these conditions are met, the student may have **lost FWS Eligibility**. Please work with Student Financial Aid to identify if eligibility has been lost.

**Initially, FWS expenses appear to be charged to departments.** However, on the final business day of each month Central Finance runs an allocation process to re-classify 75% of all expenses with worktag combinations of SC10029 and either "Student Enrolled W" or "Student Enrolled CS" to remove the expenses from the fund where the expense originated and move them to FD521 and GR100794. **This is how 75% of the student wages are paid using the Federal Share.** 

For non-revenue generating departments/units where the worktags SC10029, FD100 + PG105383 and either "Student Enrolled W" or "Student Enrolled CS" are used, Central Finance will run a secondary allocation where the remaining 25% of salary expenses and 100% of the benefits will be reimbursed as revenue. This is how the remaining 25% of the wages are paid for by institutional funding managed by Student Financial Aid. Revenue generating and auxiliary units are responsible for paying the remaining 25%.

# **WORK-STUDY AUDITS**

To maintain compliance with federal regulations governing Federal Work-Study, Student Financial Aid may periodically conduct audits of payroll procedures and FWS job duties at the department level. These audits can include an examination of position descriptions at the worker level, timesheets, and timekeeping procedures.

#### FEDERAL WORK-STUDY PROGRAM POLICIES

#### Authorization to pay students

Student Financial Aid is responsible for maintaining compliance with federal regulations in the disbursement of all Federal Work-Study Program funds. **Student Financial Aid is the only authority to determine eligibility and approve a department to expend FWS funds.** 

Departments are responsible for any unauthorized charges submitted for payment from FWS funds. This includes charges for students who do not have FWS offers; students who are out of FWS funds for the year; payment of time worked after the last day of work for the year; payments to students after we have notified you to terminate them, for whatever reason; and any other unauthorized charge to FWS funds.

#### **Regarding late timesheets**

In order for the Student Financial Aid to reasonably monitor the balance of funds, departments are only permitted to use the FWS fund and spend category for the current pay period and one pay period back in time, and the payroll system is currently set up to automatically honor those requests provided that the student is meeting all other eligibility requirements. **Time submitted that is more than one pay period back will be charged to the department.** 

Timesheets that are submitted but not supervisor-approved by the biweekly payroll deadline are periodically mass approved by Payroll Processing per their own audits and compliance requirements. However, federal regulations for the FWS program state that the hours must be confirmed as accurate and approved by the employee's supervisor, therefore time approved by Payroll staff/processes during a batch process would not be eligible for FWS usage and should be charged to the department.

In cases where time has been approved by that supervisor's departmental back up staff member, that time could be FWS eligible provided that it has not been submitted or approved late. This is acceptable because the departmental back up approver is typically tasked with managing student employees in the regular supervisor's absence, therefore would have firsthand knowledge that the hours are correct for FWS purposes.

# Pay ranges

Per federal regulations for the program, Student Financial Aid is tasked with reviewing all position descriptions and qualifications that are to be paid from Federal Work-Study Program funds to ensure consistency of pay rates across the university.

The job description and qualifications must match the Job Profile listed on Compensation's Student Classification Salary Structure (page 24) in order to meet compliance standards for the program.

In Workday, pay rate ranges are tied to the job profile used when creating the position. During the FWS job requisition creation process, target hiring pay ranges are assigned by Student Financial Aid using Compensation's Student Classification Salary Structure applicable to all Student Assistant positions 1-3, which can be found in the Compensation Grade Profile report and the OSU Job Catalog, accessible to Human Resources staff. A copy of this table including descriptions can be found on page 24 of this manual.

Once you have hired a student into a specific position, you are obligated to pay that student a rate of pay that is within the range as assigned by the Student Financial Aid. If you choose to pay a student more or less than the assigned range, the student can be paid from departmental wages at the rate you feel is appropriate.

If you feel that the assigned job profile is not appropriate and should be adjusted in some way, contact Student Financial Aid to discuss any proposed changes. We may ask you to clarify or amplify the written job description to better fit a different job profile and justify a higher or lower rate of pay if this seems appropriate.

#### **Merit raises**

Merit raises may be given to FWS students within the following guidelines:

- You may give a student a merit increase within the assigned pay range for the job profile at any
  time. You do not need permission from our office to increase the rate of pay if the new rate does
  not exceed the top of the pay range of the job profile assigned to the position.
- Giving a student a merit increase that exceeds the pay range for the job description would be
  considered a promotion. You must create a new job requisition in Workday that includes the
  increased duties and skillsets that justifies the higher job profile and subsequent pay rate range, and
  then hire the student into that position prior to raising the student's pay rate. The job description
  and qualifications for the job must match Compensation's Student Salary Structure to meet
  compliance standards for the FWS program.

#### **Timesheet retention**

Please retain access to your FWS student timesheets for **four** years following the end of the academic year (e.g., the time sheets for students who worked in the 2024-2025 academic year should be retained until May 2029). You may be requested to provide specific time sheets during our annual audit or in the event of a program review by the Department of Education.

#### Job transfers

If the department wants the student to perform work for which no FWS job description exists and continue to be paid with FWS, the department must create a new FWS job requisition in Workday that accurately describes the job the student will be doing. The student cannot be transferred to the new job until Student Financial Aid has reviewed and approved it in Workday.

**FWS worktags cannot be added after-the-fact** to a position that has not been vetted by our office. This is why a new position is required.

#### Transferring from FWS to wage

Transferring students from FWS to department wages does not require permission from Student Financial Aid. When a student has been terminated from FWS for any of the above reasons, you may continue to employ the student with department wages if you do so within the guidelines and requirements of the Office of Human Resources.

Most positions in Workday are designed in such a way that you may not need to terminate the student in order for them to be paid on wages, as they will automatically be paid from your general fund as a default. However, if that is not the desired fund and the costing must be altered, removing FWS worktags from a position is a permanent action, as they cannot be added back later. If you wish to use FWS funding for the student in the future, a new FWS position would need to be created and the student moved into it once they regain eligibility.

#### **Terminations**

As a FWS employer, you may need to release FWS students for any number of reasons. While Student Financial Aid typically does not need to be notified, please follow these guidelines to document the termination for our office:

- 1. Students may be released under the following circumstances:
  - The student requests to be released. The department does not have the authority to refuse to release a FWS student employee upon request.
  - The department does not have sufficient work for the student to do.
  - The student's work or attendance is unsatisfactory. The department has the authority to terminate any student for unsatisfactory job performance.
  - The department wishes to eliminate a job.
- 2. When releasing students, the department should do the following:
  - The student should be told the specific reason for the termination.
  - The student should be terminated in Workday.

# **Federal Work-Study probation policy**

Students who have been dismissed from their FWS employment for poor performance or attendance issues may seek another FWS job but will receive a written warning from Student Financial Aid that they have been placed on FWS probation. If a student is subsequently dismissed from another FWS job, that student will not be able to participate in the program for the remainder of the academic year. Employers should notify Student Financial Aid with the following information if a situation arises:

- Student's name and Empl ID
- Job title/position
- Department

- Dates employed
- Supervisor or contact
- Reason for termination

HR policy must be followed to release a work-study student from employment. Information regarding the dismissal of student employees can be found in section V of <u>HR Policy Document 10.10</u> and you are encouraged to discuss this process with the HRP for your department.

Student Financial Aid will refer any allegations of FWS misconduct to the appropriate university office for investigation. Students found in violation of the Student Code of Conduct may lose eligibility for FWS funds and notification will be sent to the student in writing.

Students who are dismissed from their FWS employment for misconduct (falsification of time records; misuse of confidential or privileged information; misuse, misappropriation, or theft of university property; acts of racial discrimination or sexual misconduct; or other serious infractions of The Ohio State University Code of Student Conduct) may lose eligibility to participate in FWS.

Students whose FWS eligibility is canceled will be eligible to receive Federal Direct Loans up to the program maximums for their level of enrollment or up to the student's eligibility.

#### ADDITIONAL GUIDANCE FOR SUPERVISORS

The following section is intended as a complement to other sections of this manual, and reflects common concerns raised by those tasked with supervising students.

#### **FWS Positions**

- Detailed steps for creating FWS positions can be found on page 3.
  - Detailed steps for navigating this process in Workday can be found in the Administrative Resource Center: <a href="https://admin.resources.osu.edu/workday/workday-for-core-users-human-resources/federal-work-study">https://admin.resources.osu.edu/workday/workday-for-core-users-human-resources/federal-work-study</a>
- For Student Financial Aid to review a job requisition for approval, the first Federal Work-Study box in the Costing section on the job requisition MUST be checked. Failure to do so will prevent the requisition from flowing to our office for review. This will result in a wage-only student position and cannot be amended to include FWS worktags later.
- Positions that have circumvented review by Student Financial Aid are not eligible to utilize
   FWS funds. What makes a FWS position eligible is that it has been reviewed by Student Financial
   Aid for compliance and contains two FWS worktags that are embedded into the position during
   the creation of the job requisition. Positions that are missing one or both FWS worktags are an
   indication that they did not go through the correct process, have not been reviewed by the FWS
   Office and are a compliance risk.
- FWS funds cannot be used to pay students hired on job requisitions that are designed as general intake positions. If position records are requested during an audit to confirm the job description, duties, pay rate range, worksite location, and supervisor for a particular hire, the job requisition the student was hired into will need to be detailed enough to confirm these components. General intake positions are typically not detailed or specific enough to fulfill these audit requirements.
- While not a FWS regulatory issue, it is best practice to mention FWS in the job post. Job posts
  that do not mention FWS risk being posted in the wrong job board within Workday by TAs, and
  cannot easily be located by students performing keyword searches. Some students intentionally
  hold one FWS position and one wage position, and will assume your job is not FWS-eligible if it
  was not mentioned as such in the post.

# **FWS Hiring/Termination**

- Only Student Financial Aid can determine whether students will be able to utilize FWS
  funding. Please do not promise a student an FWS-only position without knowing that the
  student has an FWS offer, and do not attempt to hire (or rehire) a student into an FWS-only
  position merely because they verbally assure you that they have a FWS offer.
- Per FERPA, only the student may share FWS offer amounts with a potential employer at the
  pre-hire stage. Please check the student's FWS eligibility indicator on the candidate grid and/or
  request that the student provide proof of funds prior to offering them an FWS-only position.
  Details can be found on page 4 of this manual.

- It is the responsibility of the department, not the student, to make sure that employees are properly hired, that all necessary paperwork is completed, and the student has timesheet access before the student is allowed to work. If the position is FWS-only and you have any doubt that a student may legitimately work on FWS funds, you must prevent that student from working until you have resolved all questions. If you allowed the student to work, the student must be paid from departmental funds if FWS cannot cover the student's hours.
- For non-revenue generating units only, notify the Cost Center Manager for your unit to have the FWS Program Match added to your FWS new/re-hire's Costing before the student begins working. Failure to do so will result in the department being responsible to cover 25% of the student's earnings. Details can be found on page 4 of this manual.
- Concerning pay rates, the supervisor is expected to choose a pay rate within the Target Hire Range for the job profile that Student Financial Aid has approved based on the job description for the position. This is how we meet the federal guidelines for the program proving that the funds are being used consistently across the university based on job description and skillsets for the work. Assigning an individual pay rate higher or lower than the pay range corresponding to the assigned job profile, then using FWS to pay the student would be a FWS program compliance risk. Information about merit increases and promotions is on page 14 of this manual.
- It is up to the discretion of the unit whether terminating FWS employees at the close of an academic year is necessary. Allowing the student to continue working from one academic year into another (spring semester into summer term) risks paying the student with departmental funds, as not all students are eligible for FWS the following academic year.
- There is no need to contact the FWS office when terminating a student. Please follow guidelines provided by the Human Resources Consultant for your unit. However, if the reason for termination involved a disciplinary issue, Student Financial Aid may need to place the student on FWS Probation. Information on probation is on page 15 of the manual.

# **Supervisory expectations**

- Expectations are that FWS students are assigned to supervisors who are regular staff and are
  available during work hours to direct student work and verify their attendance. Do not allow a
  student to work unsupervised.
- Ensure students perform only the tasks listed in their job description. Students should be working within their assigned job descriptions at all times so that they are properly compensated for the work they do.
- Remember that **FWS students may work no more than 20 hours per week and be paid with FWS funds** unless otherwise instructed by Student Financial Aid. Hours worked in excess of 20 hours in a week will be charged to the department.
- It is the responsibility of the student's direct supervisor to ensure timesheets are submitted weekly and approved on time. Set expectations and resources in writing and reinforce them during your new employee orientation.

- It is best practice to discuss with the student ahead of time whether your department has
  funds to continue their employment once their FWS funding has been exhausted for the
  academic year.
- Remote work options are acceptable, and the FWS Office does not intend on monitoring how these positions are managed. However, from a best-practices standpoint there are certain considerations in this arrangement that require forethought:
  - Notate in the job description that the position is remote, or a hybrid of remote and onsite. Please also include resource expectations (for example, dedicated workspace, reliable internet, whether the department has loaner equipment.) The goal is to ensure the student is made aware of what resources they need prior to applying for the job, and to document the 'location' component for FWS program audits.
  - Have a plan for modeling/communicating/coaching to basic parameters of professionalism while off site.
  - Have a plan to support, manage and/or document:
    - Time/attendance
    - Quality of work
    - Technical support needs
  - Set expectations and resources in writing and reinforce them during your new employee orientation.
- Do not assume that a student who worked on FWS for you last year will be able to do so again the following year. Students tend to be eligible for the same financial aid programs from year to year, but this is not always true. Students must complete the FAFSA and receive a new FWS offer annually to continue using FWS with your department the following year.

#### **Timesheets and Fiscal Concerns**

- Detailed information on these subjects is available on the Administrative Resource Center.
  - o <a href="https://admin.resources.osu.edu/workday/workday-for-core-users-finance/federal-work-study">https://admin.resources.osu.edu/workday/workday-for-core-users-finance/federal-work-study</a>
- Late timesheets are the main reason otherwise FWS eligible hours are charged to departments. Make sure your students submit timesheets weekly and approve them prior to the biweekly payroll deadline. Failure to do so may result in the student being paid from your general funds depending on how far back in time the hours were worked.
- Do not approve time without first checking the following:
  - O Did the student submit time for the correct week?
  - O Did the student work the hours listed?
  - If time was worked during a scheduled class time, is cancellation of the class noted in the comment section on the timesheet?

- Inaccurate timesheets are the second main reason otherwise FWS eligible hours are charged to departments. Approving inaccurate time and attempting to correct it after two or more pay periods have passed will also result in hours being charged to the department.
- Supervisors and fiscal staff should check the <u>Federal Work Study Status Report</u> in Workday
  after each pay cycle to monitor students' offer amounts and earnings. This report will help you
  know when a student's offer amount has been changed, how much they have earned-to-date,
  and how close they are to utilizing all of their funding.
- Departments may contact Student Financial Aid to request the use of FWS funding for timesheets that are more than one pay period back in time. Depending on the extenuating circumstances and the amount of funding available at the time, we MAY be able to allow the use of work-study funds. If approved, a journal transfer should be performed by the Cost Center Manager for the unit.
- Be aware that students <u>MUST</u> be paid for all hours worked. If students without FWS funds are allowed to work or if time is worked that cannot be paid by the FWS funds, they must still be paid for all hours worked. You do not have the option to tell a student that they will not be paid, even if you feel the error was on the student's part.
- Pay late time at the rate of pay in effect during the pay period in which the hours were worked.
- If students have earned all FWS funding prior to the end of the academic year, it is up to the discretion of the unit whether it is necessary to alter costing data on a position. Taking no action will result in paying the student from the unit's default costing allocation on that position, which is often appropriate.
- Please be aware that changing the costing allocation by removing FWS worktags from a position is a permanent action and they cannot be added back later. In cases where the FWS worktags have been removed, if the unit wishes to use FWS to pay the student in the future a new FWS position would need to be created and the student hired into the position.

#### ADDENDUM: FEDERAL WORK-STUDY PROGRAM REGULATIONS

Federal Work-Study is a need-based, federal financial aid program. Under this program, funds are given to participating colleges and universities to administer in accordance with the regulations and guidelines provided by the Congress of the United States and the Department of Education.

#### **Statutory authority**

Federal Work-Study is a federal aid program authorized by Title IV of the Higher Education Act.

#### **Administration of the Program**

Federal monies are allocated annually to institutions which are eligible to participate in the program. The federal allocation currently funds up to 75 percent of FWS student wages. The employer or the educational institution must provide matching funds to pay the remaining 25 percent. Federal Work-Study is administered in accordance with the laws, regulations, and other such instructions as may be issued by, or on behalf of, the Secretary of Education. Responsibility for administering the program is shared by participating institutions, the Regional Offices of the Department of Education, and the Office of Student Assistance in Washington, D.C.

#### **Community Service Requirement**

The 1998 Reauthorization of the Higher Education Act of 1965 contains a new provision that institutions must expend at least seven percent of their Federal Work-Study Program allocations to pay students working in jobs which serve the larger community. There is no restriction as to whether these jobs may be on- or off-campus (although students may be employed in off-campus jobs **only** under specific contract arrangements), but the services provided must be available to members of the larger community on an equal basis with institutional faculty, staff, and students.

Students working in community service jobs must be providing services which are designed to improve the quality of life for community residents, particularly low-income individuals, or to solve particular problems related to their needs. Such services include fields such as health care, childcare, literacy training, education, welfare, social services, transportation, housing and neighborhood improvement, public safety, crime prevention and control, recreation, rural development, community improvement, support to students with disabilities, mentoring, tutoring, supporting educational and recreational activities, and counseling.

#### Literacy tutoring and family literacy programs

Effective July 1, 1997, the Department of Education provided for a waiver of the 25 percent institutional-share requirement for students who are employed as reading tutors to elementary school children. The institutional share requirement is also waived, effective July 1, 1998, for students employed as tutors in a family literacy program that provides services to families with preschool or elementary-school children. Each school must have at least one student participating in this program.

### Coordination with other financial aid programs

As a need-based, federal financial aid program, Federal Work-Study is offered in combination with other aid programs to meet students' financial needs. Students must apply for FWS by filing the Free Application for Federal Student Aid (FAFSA) by Ohio State's priority dates, indicate that they are interested, show financial need as calculated according to federal regulations, and meet other institutional requirements for eligibility. By federal regulation, students may not receive funds which in total exceed their financial need. Some students, therefore, may not be eligible for FWS at all, and others may have their FWS eligibility decreased or eliminated during the academic year if other aid is offered to them.

# **Conditions for employer participation**

The restrictions discussed below are applicable to all work under Federal Work-Study whether for the institution or a qualified off-campus agency.

<u>Displacement of regular workers:</u> Employment under Federal Work-Study must not result in the displacement of employed workers or impair existing contracts for services. Employers cannot use students in jobs which traditionally and customarily have been filled by full-time or permanent personnel. It is the intent of the program to create <u>new</u> job opportunities. Institutions are advised to keep this thought foremost in mind as they develop their programs.

Religious involvement: Federal Work-Study positions may not involve constructing, operating, or maintaining any part of a building used for religious worship or sectarian instruction. The key issues in determining what is "religious work" in regard to work performed by FWS students are 1) the main purpose of the building in which the work is taking place, and 2) the actual job that is being performed. For example FWS students may work in a non-profit day nursery operated by a church, as long as the nursery is open to the public on the same basis as for members of the church (i.e., is in the public interest) and as long as the particular positions to which the students are assigned do not involve sectarian instruction or the religious activities of the church. In determining whether any FWS employment will violate this restriction, the Student Financial Aid will consider the purpose of the work rather than just the nature of the employing organization. An example of employment not eligible for FWS is work maintaining a chapel which does not serve any but religious purposes. Maintenance of a college auditorium which is only occasionally used for religious services would be eligible employment under FWS. In this case, the main purpose of the auditorium is not for religious worship or sectarian instruction.

<u>Political involvement:</u> Positions under Federal Work-Study must be free of political involvement. Under this prohibition, students cannot be assigned to work for individual members of Congress. However, students could be assigned to the staff of a standing committee of a state legislature if the selection of staff for such a committee and the work performed by such a staff is conducted in a nonpartisan fashion. Further, the political support or affiliation of students may not be prerequisites or considerations of employment. Positions that involve lobbying at the federal level are also prohibited.

<u>Dues and fees prohibited:</u> Employers may not solicit, accept, or permit to be solicited from students or their parents or spouses any fees, commissions, or compensations of any kind, or the granting of gifts or gratuities as conditions or prerequisites for their Federal Work-Study employment. However, if students are required to belong to unions and pay dues as a condition of employment, and further the dues are assessed against non-Federal Work-Study employees, then the dues may be paid by the students from their compensation while they are employed under the program. Federal Work-Study employees should not be treated differently than non-Federal Work-Study employees performing similar functions.

<u>Voluntary services:</u> The Fair Labor Standards Act of 1938, as amended, prohibits a covered employer (including educational institutions) from accepting voluntary services from any paid employee. Therefore, students who are employed under Federal Work-Study must be paid for all hours worked. (Contact the nearest office of the Wage and Hour Division, Employment Standards Administration, United States Department of Labor, for information regarding voluntary services of institutional employees.)

# **Employment on-campus**

Generally, Federal Work-Study students may be employed in any department, division, office, or other unit of the institution.

<u>Work for an individual professor:</u> FWS students may also be assigned to assist individual professors if the work involved is the type which the institution would normally support under its own employment program. The assignment of students to serve as research assistants to professors is one example. This is

appropriate as long as the work performed by the students is in line with the professors' official duties and is considered work for the institution itself.

<u>Limitation of employment in profit-making activities:</u> If an institution is engaged in profit-making activities, work on such activities is not permissible under Federal Work-Study. Profit-making activities may include the operation or rental of athletic fields, auditoriums, theaters, parking lots, etc. For example, if the institution leases a facility to a private sports club or organization, any jobs created as a result would not qualify as Federal Work-Study Positions. This limitation does not apply to events which are conducted as part of the educational, cultural, or athletic programs of the institution itself. The fact that a fee may be charged for entrance to such an event does not, in itself, disqualify any jobs related to the event from being Federal Work-Study positions.

Employment in food service or other contractual operations: An institution may assign Federal Work-Study students to work in its food service, security, maintenance, cleaning, or other operations under the supervision of a private contractor as long as the contract between the institution and the commercial service company specifies the number of FWS students to be employed and that the institution selects the students to be employed and determines each student's pay rate. Under these circumstances, the student is considered to be employed by the institution itself and the job is classified as on-campus employment.

Academic credit for Federal Work-Study: The fact that a student may receive academic credit for the work performed on a job does not automatically disqualify the job under FWS. However, there are certain restrictions. An internship or practicum which a student must complete as a degree requirement and for which students are normally unpaid would not qualify under FWS. If students completing such requirements are normally paid, however, they may be employed under Federal Work-Study. If a job is normally a paid position and is an otherwise FWS-eligible job, students may simultaneously receive academic credit and pay for the work performed. Such positions as student teaching are not normally paid, and therefore, they would not qualify as eligible jobs under Federal Work-Study.

# Student eligibility criteria

In order to work under Federal Work-Study at The Ohio State University, students must:

- 1. Show demonstrated financial need;
- 2. Be admitted to The Ohio State University in a degree-granting program;
- 3. Be registered for the current semester at The Ohio State University for at least half-time enrollment (6 credit-hours for undergraduates; 4 credit-hours for graduate students);
- 4. Be U.S. citizens or eligible non-citizens;
- 5. Maintain Satisfactory Academic Progress according to the standards and practices of The Ohio State University;
- 6. Not be in default on Perkins Loans or on any loans made, insured, or guaranteed under the Stafford Loan Program, the PLUS/SLS Program, or the William D. Ford Federal Direct Loan Programs:
- 7. Not owe refunds on any federal funds previously received at any institution;
- 8. Have a valid Social Security Number;

Some students who are eligible under these criteria may not receive FWS offers because of limited funding.

#### **Determining Financial Need**

Financial need is defined by the federal government as the difference between the cost of attending a postsecondary institution and the resources available to the student to meet such costs. Need is determined by the information provided on the Free Application for Federal Student Aid (FAFSA)

As a need-based federal financial aid program, Federal Work-Study cannot be offered to students who do not file a FAFSA or who do not demonstrate financial need.

# **Eligibility of transient students**

Students attending The Ohio State University during summer sessions only, and not during the regular academic year, are not eligible for employment under Federal Work-Study.

# STUDENT HOURLY GRADE CLASSIFICATION SALARY STRUCTURE: STUDENT ASSISTANTS

**DISCLAIMER:** The following table is the purview of <u>Compensation</u>; it has been edited by Student Financial Aid and presented here for convenience and context. This is the table the Federal Work-Study Office uses when evaluating work-study job requisition submissions.

Human Resources staff should contact Compensation for the most current version when counseling Managers and alert the Federal Work-Study Office if a discrepancy within the table is identified.

This information is also available in Workday by searching Student Hourly Grade and OSU Job Catalog.

This Student Hourly Grade structure went into effect 12/20/2020 in preparation for the Workday launch 1/1/2021.



# Student Assistants – Enrolled at OSU

Job Profile	Job Code	Grade	Minimum	Maximum	Job Description
Student Assistant 1	STUDENT 1	S01 Student Hourly	\$13.00	\$20.80	Duties are of a routine and simple nature. entry level. Requires direct supervision with relatively specific instructions. Little or no training or experience is required.
Student Assistant 2	STUDENT 2	S02 Student Hourly	\$13.65	\$21.16	Duties are varied and less routine and involve a moderate degree of responsibility and judgment. May lead or coordinate activities of other student employees.  Requires previous knowledge or skill and/or equivalent experience or training.
Student Assistant 3	STUDENT 3	S03 Student Hourly	\$15.00	\$23.25	Duties are moderately technical or complex or involve a high degree of responsibility and judgment. May direct activities of other student employees. A significant amount of specialized training or experience is required.

Email: sfa-jobs@osu.edu | sfa.osu.edu/jobs/employer-services | FWS/SFA 7/19/2024