

Federal Work-Study Program



Office of Student Financial Aid

Off-Campus Agency Manual

2011-2012

"Federal Work-Study (FWS) is a need-based program which provides jobs for students with financial need, allowing them to earn money to help pay education expenses. The program encourages community service work and work related to the student's course of study."



Table of Contents

FWS Staff Contact Information	3
Introduction	4
FWS Regulations	4
<i>Statutory Authority</i>	4
<i>Conditions for Employer Participation</i>	4
<i>Determining Financial Need</i>	5
<i>Student Eligibility</i>	5
<i>Changes in Student Eligibility</i>	6
Job Referral Forms	6
Background Checks	6
Determination of Pay Rates	7
Merit Raises	7
Authorization to Pay Students	7
Supervising Student Employees	7
<i>Time Sheets</i>	8
<i>Payroll Calendar</i>	9
<i>Submission of Time Sheets: Step by Step</i>	9
<i>Work-Study Audits</i>	9
<i>Terminations</i>	10
<i>Accident and Illness Reporting</i>	10
Frequently Asked Questions	11



FWS Staff Contact Information

Financial Aid Staff Assistant

Vicky Dailey

Student Academic Services Building, 4th Floor
281 West Lane Avenue
Columbus, OH 43210-1132
P: (614) 247-8364
F: (614) 247-8445
dailey.84@osu.edu

HR Professional

Brent Leasure

Student Academic Services Building, 6th Floor
281 West Lane Avenue
Columbus, OH 43210-1132
P: (614) 247-2697
F: (614) 688-8636
bleasure@esue.ohio-state.edu

Law School Contacts

HR Manager

Tara Scott

Moritz College of Law
Drinko Hall 220
55 West 12th Avenue
Columbus, OH 43210
P: (614) 688-3674
F: (614) 247-4630
scott.20@osu.edu

HR Associate

Renatta Laney

Moritz College of Law
Drinko Hall 220
55 West 12th Avenue
Columbus, OH 43210
P: (614) 292-2227
F: (614) 247-4630
laney.14@osu.edu

*Director of Public Services and
Public Interest Programs*

Cybele Smith

Moritz College of Law
Drinko Hall 104B
55 West 12th Avenue
Columbus, OH 43210
P: (614) 292-7707
F: (614) 292-6667
smith.302@osu.edu



Introduction

The Federal Work-Study (FWS) program benefits both student recipients and the employers who hire them. Before anyone can enjoy the benefits of FWS, however, students, employers, and the Office of Student Financial Aid together must meet all federal and university guidelines. FWS is *first and foremost a federal financial aid program that must be administered responsibly by the Office of Student Financial Aid*. The purpose of this manual is to help you, the FWS supervisors, to do what is required and expected of you as FWS agencies.

This manual is intended to help you gain more insight into how the FWS Office administers this program in accordance with federal and institutional regulations and policies. Many of the questions that are commonly raised regarding FWS and problems that frequently arise are also discussed in this manual. Of course, not all of the potential problems that may arise in the administration of the FWS program are addressed in this publication, but if you read and follow all of the guidelines as they are explained in this manual, you should find that problems will arise less frequently.

Please keep this manual handy for reference by both your agency payroll contact and your FWS supervisors. If you have any questions or concerns about the FWS program that are not addressed in this manual, please call the Federal Work-Study and Student Employment Office at 614-292-8286.. Law agencies may also contact Tara Scott at (614) 688-3674 or scott.20@osu.edu.

Contact the FWS Office promptly when there are changes to agency addresses, phone numbers, or work-study supervisors.

Best wishes for a great year!

Federal Work-Study Regulations

Statutory Authority

The FWS program was originally authorized by the Economic Opportunity Act of 1964. The Higher Education Amendments of 1968 (P.L. 90-575) transferred the statutory authority for the program to the Higher Education Act of 1965 (P.L. 89-329), as amended.

The FWS program is currently authorized under Part C of Title IV of the Higher Education Act of 1965, as amended by the Educational Amendments of 1968, 1972, 1976, 1980, 1986, 1992, and 1998.

Conditions for Employer Participation

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

Displacement of Regular Workers: Employment under the FWS program must not result in the displacement of employed workers or impair existing contracts for services. Employers cannot use students in jobs that traditionally and customarily have been filled by full-time or permanent personnel. It is the intent of the program to create **NEW** job opportunities. Institutions are advised to keep this thought foremost in mind as they develop their programs.

Religious Involvement: FWS 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. In determining whether any FWS employment will violate this restriction, the FWS Office will consider the purpose of the work rather than just the nature of the employing organization.



Political Involvement: Positions under the FWS program 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.

Community Service Requirement: The 1998 Reauthorization of the Higher Education Act of 1965 contains a new provision that institutions must expend at least 7 percent of their FWS program allocations to pay students working in jobs that 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 must be providing services that 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, child care, 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 (other than those of the institution itself) with disabilities, mentoring, tutoring, supporting educational and recreational activities, and counseling.

The America Reads Challenge: Effective July 1, 1997, the Department of Education provided a waiver of the 25% institutional-share requirement for students who are employed as reading tutors to elementary school children as part of the America Reads Challenge. 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.

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. The student's first step in determining and documenting financial need is filing the *Free Application for Federal Student Aid* (FAFSA). Ohio State's priority deadline for awarding Federal Work-Study is February 15. The FAFSA information provides a complete summary of each student's personal and family financial situation to college financial aid administrators. An analysis of the family's financial situation, according to a standardized methodology devised by the U.S. Congress, produces a dollar amount (Expected Family Contribution, or EFC) that the family is expected to be able to contribute toward the student's educational and education-related expenses.

Every educational institution devises standard student budgets, taking into account instructional and general fees, books and supplies, and estimated living expenses. Each student's EFC is subtracted from the student budget and the resulting difference is the student's financial need. As a NEED-BASED federal financial aid program, FWS cannot be awarded to those students who do not file a FAFSA or who do not demonstrate financial need.

Student Eligibility Criteria

In order to work under the FWS program at Ohio State, students must:

- Show demonstrated financial need
- Be admitted to Ohio State in a degree-granting program
- Be registered for the current quarter or semester at Ohio State for at least half-time enrollment (6 credit-hours for undergraduates; 5 credit-hours for graduate and professional students; 3 credit-hours for law students)
- Have current quarter or semester instructional and general fees paid before beginning to work
- Be U.S. citizens or eligible non-citizens
- Maintain satisfactory academic progress according to the standards and practices of Ohio State
- 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



- Not owe refunds on any federal funds previously received at any institution
- Have a valid Social Security Number
- Be registered with the Selective Service, if required
- Sign a statement of updated information, if required

FWS students must reapply for financial aid every year, so be sure that your student workers are awarded FWS before you hire them. Some students who are eligible under these criteria may not receive FWS awards because of limited funding.

DO NOT PROMISE STUDENTS FWS JOBS WITHOUT KNOWING IF THEY ARE ELIGIBLE.

Changes in Student Eligibility

The FWS Office may sometimes call you and instruct you to terminate a student, often because of a change in the student's financial aid eligibility. We will terminate students in the following circumstances:

- The student has earned the entire award amount
- The student has withdrawn from school for the quarter or semester
- The student has dropped classes and is now enrolled less than half-time
- The student has received an additional financial aid award which meets financial need
- The student is not currently attending Ohio State
- The student has been academically dismissed
- The student is not meeting the university's Standards of Academic Progress for financial aid eligibility (SAP)
- The student owes a refund to a federal grant program or is in default on a federal loan
- The student's budget has decreased, resulting in decreased financial need which is met or exceeded by other awards and FWS earnings to date
- The student's Expected Family Contribution (EFC) has increased, resulting in decreased financial need which is met or exceeded by other awards and FWS earnings to date
- The student has graduated

Job Referral Forms

Job referral forms must be obtained from the online work-study system before a student may be hired and paid out of FWS funds. A student's verbal assurance that he or she has work-study is not enough.

Once a student is hired by the agency, the student must contact Brent Leasure at (614) 247-2697 or bleasure@esue.ohio-state.edu (Law Students: Contact Renatta Laney at (614) 292-2227 or laney.14@osu.edu) to set up an appointment to complete payroll processing. Make sure students complete the payroll process with Brent (or Renatta for law students) **prior to** beginning work.

Background Checks

Students need to have a background check completed in order to work at an agency when they will be working with vulnerable populations including children, the elderly, and the disabled. Students can also be required to have a background check completed even if they will not be working with a vulnerable population but their employing agency still requires all employees to be background checked.



If we determine that a student needs to have a background check completed for their position, Brent Leasure will give them a background check form at their payroll processing meeting. The student should fill it out and then take it to the Ohio State Campus Police Department for processing. This is free of charge to students and employing agencies.

If the employing agency wants to have the student conduct a background check using their own system, this is acceptable too; the cost for the background check using their own system is the responsibility of the agency. We ask that you provide us with a copy of the results so we can determine whether a student is able to work in the position for which they have applied. If students have their background checks completed through Ohio State's Campus Police and your agency requires a copy for your records, the student must either go to the police department where they initiated the background check to request a copy of the results or contact the FWS Office (614) 292-8286 to schedule a time to pick up a copy of the results. The results must be picked up by the student and will not be mailed.

***Please note, students are not to begin working at an agency while the results of their background check are pending.**

Determination of Pay Rates

The FWS Office determines pay rates on the basis of the job description provided by the community service agency.

Merit Raises

Please do not promise student employees a merit pay increase without first consulting with the FWS Office.

Merit increases can be permitted up to the top of the pay range which is assigned to the student's current job. Please contact our office if you have a student to whom you would like to give a merit increase. Normally, we will consider a student for an increase if he or she has worked for 3 quarters or 2 semesters in a position and is returning to that position.

Authorization to Pay Students

The FWS Office is responsible for maintaining compliance with federal regulations in the disbursement of all FWS program funds awarded to Ohio State. **Therefore, only the FWS Office can authorize any employer to expend these funds, and the sole authority to decide who is eligible for these funds rests with the FWS Office.**

Please be aware that your agency will be responsible to reimburse, from agency funds, any unauthorized expenditures you make from FWS funds. This includes paying students who do not have FWS awards; paying students whose current-quarter or semester university fees are not paid; paying students who are out of FWS funds for the year; paying students after the last day of work for the year; paying students after we have notified you to terminate them, for whatever reason; and any other unauthorized expenditure made from FWS funds.

Supervising Student Employees

Each student should be assigned to a permanent supervisor. Normally, this is the person named on the Job Description as supervisor. If the Job Description specifies that the supervisor is "assigned" by the agency, the agency should assign a specific person to oversee the student's work. Both the supervisor and the student should have a clear understanding about how records of time worked will be kept. Make sure that FWS students are assigned to supervisors who are available during work hours to direct their work and verify their attendance.

Make sure that students only perform tasks included in the job description so they are properly compensated for their duties. Send students home when there is no work for them to do.



Student Timesheets

It is primarily the supervisor's responsibility to make sure that time-keeping records are accurate and are submitted for payment each pay period. PLEASE BE SURE TO CHECK THE RECORDED HOURS ON THE TIMESHEET AND DO NOT ALLOW STUDENTS TO BE THE LAST ONES TO HANDLE TIMESHEETS!

Keep track of the students' earnings so they do not exceed their award amount. The FWS Office will assist you with this record keeping by sending out bi-weekly status reports. Remember that students may work no more than the maximum number of hours (40) permitted each bi-weekly pay period by the FWS office.

Be aware that students must be paid for all hours worked. If students without FWS awards are allowed to work, or if a student has exhausted their award, they cannot be paid from the FWS account. However, they still must be compensated.

Read and familiarize yourself with the FWS procedures sheet that students receive.

Excel Timesheets are not to be filled out using Google Docs because of security concerns. Timesheets that have encryptions removed will not be accepted.

Documentation of Work:

- A written record of time worked must be kept on a time sheet. These are the only written forms of documentation acceptable to the federal government. You are responsible for maintaining these records until the end of the current academic year.
- *All* information must be filled out in detail.
- Times noted on these time sheets must be for the exact time worked with a.m. and p.m. hours noted. Time calculations must be checked. Each agency is responsible for making sure that time sheets are accurately and completely filled out.
- Supervisors must sign the time sheets. The supervisor verifies by signing the time sheet that the student worked the hours indicated, that the work was satisfactory, and that all information on the time sheet is correct.
- Students may not work hours in one pay period with the understanding that they will be submitted for payment on a succeeding pay period, regardless of how willing students are to accept such arrangements.
- If students must work outside the normal 8-5, Monday-Friday office hours, these hours must be noted on the original Job Description. Agencies must have explicit plans concerning their methods for supervising and for monitoring the hours and levels of performance on these students.
- *Students cannot be scheduled to work at times when their classes are scheduled.* Such arrangements are prohibited by federal regulation. If they come in because class was cancelled, please mark that on the timesheet.
- Students must complete their time sheets properly. All time sheets must be signed in ink by the appropriate supervisor or that supervisor's designee. No name stamps are acceptable. Any alteration or correction of the time sheet must be initialed in ink by the appropriate supervisor. **Students should not be permitted to handle their time sheets after they are signed.**
- EMAIL/FAX TIME SHEETS to Brent Leasure in the Budget and Human Resources area of Ohio State University's Office of Enrollment Services, Student Academic Services Building, 6th Floor, at Timesheets@esue.ohio-state.edu or fax to **688-8636**, BY NOON ON THE FINAL FRIDAY of each pay period. Law student timesheets should be submitted to Renatta Laney through email at laney.14@osu.edu or fax to (614) 247-4630.
- IMMEDIATELY FOLLOWING THE EMAIL/FAXING OF THE TIME SHEET, PHOTOCOPY THE TIME SHEET, RETAIN THE COPY IN YOUR FILES, AND MAIL THE ORIGINAL TO STUDENT ACADEMIC SERVICES BUILDING, 6TH FLOOR, 281 WEST LANE AVENUE, COLUMBUS, OH. 43210-1132. (LAW STUDENTS' TIMESHEETS SHOULD BE MAILED TO RENATTA LANEY AT MORITZ COLLEGE OF LAW, DRINKO HALL 220, 55 WEST 12TH AVENUE, COLUMBUS, OH 43210. EACH ORIGINAL, SIGNED TIMESHEET MUST BE RECEIVED BEFORE THE NEXT TIME SHEET WILL BE ACCEPTED AND PROCESSED FOR PAYMENT.



Submission of Timesheets: Step by Step

Step 1: Supervisor, check time sheets to make sure it is accurate.

Step 2: Email/Fax time sheets to the Budget and Human Resources area of Ohio State's Office of Enrollment Services, Student Academic Services Building, 6th Floor, BY NOON ON THE FINAL FRIDAY of each pay period. That is the day before the dates in the "Ends" column of the Biweekly Pay Schedule for June 2010-June 2011. Law students must follow the same schedule, only submit timesheets to Renatta Laney by Monday following the end of each pay period. **If submitted via email, the subject of the email needs to have the student's last name and pay period # of the timesheet being submitted. If more than one timesheet is being submitted in a single email, the file names of the attachments should reference each student's last name and the pay period #.**

- Check time sheets before they are signed for the following:
 - Did the student work the hours listed?
 - If the student worked during a canceled class time, is it noted?
 - Was work performed in a satisfactory manner?
 - Are there any addition errors?
 - Are hourly rates of pay correct?
 - Are time sheets signed in ink by the supervisor?
 - Are corrections initialed in ink by the appropriate supervisor?

You may fax time sheets to 688-8636. The pay schedule for 2010-2011 is listed on the following page.

Step 3: Immediately photocopy the time sheet and mail the original to Student Academic Services Building, 6th Floor, 281 West Lane Avenue, Columbus, OH, 43210. Each original, signed time sheet with two signatures must be received before the next time sheet will be accepted and processed for payment. Law student time sheets must be mailed to Renatta Laney at Moritz College of Law, Drinko Hall 220, 55 West 12th Avenue, Columbus, OH 43210.

Step 4: Keep the photocopied time sheet. Per the Agreement, the agency supervisor agrees to keep time sheets for three (3) years after the current academic year.

Do not blame the student for mistakes submitted on the time sheet. It is the supervisor's responsibility to check the time sheet before turning it in.

Payroll Calendar

Ohio State's payroll calendar can be found online at <http://www.ctrl.ohio-state.edu/pay/pay-calendars.shtm>. Additionally, our office will e-mail you a copy of the updated calendar prior to the beginning of the award year. The first day that students (other than students enrolled in the Moritz College of Law) will be allowed to work is July 1, 2011, and the last day of work for the year will be at the end of spring term, 2012.

Work-Study Audits

In order to maintain compliance with federal regulations governing the FWS program, the FWS Office will periodically conduct audits of payroll procedures. If a student working at your agency is randomly selected for an audit, you must be prepared to provide the requested timesheets for that student. Therefore, it is very important that you keep copies of each work-study student's timesheets so you can document time worked by each student.



Terminations

As an employing agency, you may be in a position to release FWS students for a number of reasons. Any time you terminate a student, please follow these guidelines to document the termination for our office.

1. Students may be released under the following circumstances:
 - a. The student requests to be released. The employer does not have the authority to refuse to release a FWS student upon request.
 - b. The employer does not have sufficient work for the student to do.
 - c. The student's work or attendance is unsatisfactory. The employer has the authority to terminate any student for unsatisfactory job performance.
 - d. The agency wishes to eliminate a job.
2. When releasing students, the employer should do the following:
 - a. The student should be told the specific reason for the termination.
 - b. Brent Leasure or Renatta Laney should be informed by e-mail of the student's last day of work immediately.
3. Transferring students from FWS to agency wages does not require permission from the FWS Office. When a student has been terminated from FWS for any of the above reasons, you may continue to employ the student on agency wages as long as you do so within the guidelines and requirements of all applicable federal, state, and local employment regulations.
4. **ALL** FWS students are automatically released from their FWS jobs at the end of spring term each year. No documentation of termination from the department employer is necessary for students who work up to the end of spring term.

If the FWS Office has terminated students, they may not return to work until their reestablished eligibility has been confirmed by with the FWS Office. If they are permitted to work, their compensation will not come from FWS funds.

Accident and Illness Reporting

In the event that a student has a work-related injury or illness, the student, whether an undergraduate, graduate, professional or law student, will need to obtain an "Employee Accident Report" form from Debbie Stalter, to be completed and submitted as soon as possible. As the supervisor, you can help by contacting Debbie at 688-8248 (Student Academic Services Building, 6th Floor, 281 West Lane Avenue) who will assist in ensuring that all appropriate paperwork is completed and that the student receives the care he or she needs.



Frequently Asked Questions

Can I formally evaluate a work-study student's performance at my agency?

Yes, you may use any type of evaluation form you would like. Remember to only evaluate based on the job duties in your job description.

Can work-study students work during school breaks?

This decision is made by the FWS Office each term prior to the break. We will inform you of eligibility to work and hours able to work prior to each break. Law agencies will be informed of whether law students may work over the summer prior to the summer term.

Can I recruit students? How?

- Yes. It is difficult for us to promote the community service jobs when students are not required to come to the FWS Office to obtain a referral form. You cannot post anything in our office, but feel free to try these options for recruiting students for your positions:
 - Place an advertisement in The Lantern, the student newspaper on campus (website: <http://www.thelantern.com/> and look under "Classifieds").
 - Contact specific academic departments based on what major may be interested in your position(s). A listing of the colleges and schools within Ohio State may be found here: <http://www.osu.edu/academics/a-z.php>. The departments may know of students looking for jobs or can tell you how you can advertise your jobs with them.
 - Look into contacting student groups who may be interested in your positions through the Ohio Union (<http://ohiounion.osu.edu/>).
 - If you have had FWS students in the past, ask them to promote your jobs and their experiences working for you with their friends here at OSU.
- Law agencies wishing to recruit and advertise to law students may contact Tara Scott at (614) 688-3674 or scott.20@osu.edu, or Cybele Smith at (614) 292-7707 or smith.302@osu.edu.

Note: Please make sure, when advertising to the general public, that you mention in the ad that the students **must** have a Federal-Work-Study award from Ohio State in order to be eligible and hired into the Federal Work-Study jobs.

When will the FWSP Office perform a site visit?

Site visits occur initially for each agency and then again anytime the agency changes physical location or contact. We will also be glad to visit you at any time if you feel a meeting would be helpful.

Will Ohio State continue funding the 25% of the award not covered through the Federal Government? For the 2011-2012 year, yes. This decision will be reexamined every year, however, and for the 2012-2013 award year and following, Ohio State may require some or all agencies to pay the required 25% employer match.