

# Federal Work-Study Program



**THE OHIO STATE UNIVERSITY**

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## Student Financial Aid On-Campus Manual

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*“Federal Work-Study (FWS) is a need-based program that provides jobs for undergraduate and graduate 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.”*

# FEDERAL WORK-STUDY PROGRAM MANUAL

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## WHAT IS FEDERAL WORK-STUDY?

***From a financial aid administrator's perspective:*** Federal Work-Study (FWS) 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.

Each institution develops criteria to award FWS funds to its students in a way that will best support those students who have documented financial need. Because of relatively limited funding and the number of students at Ohio State, many students will not be awarded FWS funds although they may have significant financial need. Of the more than 15,000 students who are employed at Ohio State each year, only about 2,500 are paid with FWS funds.

Once FWS is awarded, Student Financial Aid must monitor all funds paid out and reconcile at the end of each fiscal year to report to the Department of Education.

***From an employer's perspective:*** Federal Work-Study is a source of funding to pay student workers who are eligible for the program. Although it is a benefit to have this additional funding, it requires additional work to 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 at the end of this manual.*

## HOW DOES FEDERAL WORK-STUDY WORK?

- Ohio State's FWS office gives the employer an account in its online job board
- Employer posts jobs for students
- FWS office reviews each job post and sets a pay range corresponding to the job description
- Eligible students log in and look for jobs, then contact employers to apply
- Employer's human resources (HR) office verifies student eligibility and completes employment paperwork
- Student works for employer
- Employer pays student biweekly using FWS fund and account
- Student receives payment
- FWS office monitors payments and sends error reports to HR representative or employer biweekly
- Employer tracks students' earnings via eReports

## THE HIRING PROCESS

1. The student contacts the supervisor or contact person as directed in the instructions on the job post. Ideally, the student will bring a Job Referral Form to the interview. The form is downloaded by students off of the job board. It is not mandatory to use, however it is the only way an employer can be sure the student has been awarded with FWS, and provides documentation for audits. Instructions for use are located at the top of the form.

2. As the interviewer, you make sure the student has the qualifications for the specific job as indicated on the Job Referral Form, and will be able to work the required days and hours. If you are satisfied, you may hire that student for the specific job to which they have been referred. If you are not satisfied with the student's suitability for that particular job, you should tell the student that they will not be hired for that job.
3. 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 full-time and part-time employees complete forms agreeing to comply with established codes of responsibility for security and confidentiality. These forms 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. **Please do not pass the background check fee on to students receiving need-based financial aid. The expectation is that this fee will be covered by the employing department.**
  - It is best practice to attach a copy of the Job Referral Form to the HRA.

**NOTE:** If supervisors put students to work without the requisite payroll forms, the students **cannot be paid** from FWS funding.

4. **Federal guidelines prohibit students from working during scheduled class periods.** 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 on eTimesheets in the comment section.
5. The financial aid award year begins the first day of summer semester and ends the last day of spring semester. **Students must be re-hired to begin work again summer or autumn semester each year, even if they are returning to the job they worked the preceding award year.**
6. HR contacts should keep all employment documents for students working on FWS for **four years** from the last dates of employment. The FWS office may request these documents for internal or external auditing of the FWS fund.

## SUPERVISING STUDENT EMPLOYEES

Each student should be assigned to a permanent supervisor. Usually this is the supervisor listed on the job post. When a student's regular supervisors is not available, an alternate should be designated and the student informed. **It is primarily the supervisor's responsibility to make sure that time-keeping records are accurate and are submitted for payment each pay period.**

**NOTE:** The FWS office expects that students will be supervised by full-time, permanent university employees who will be in the area during the students' work hours and can assure that each student reports as scheduled

and works on appropriate projects while in the work place. Supervisors are responsible for making sure that students are doing the work indicated in their job descriptions and verifying that time worked is properly documented. Each department is responsible for making sure its FWS student workers are adequately supervised by appropriate staff.

### **Documentation of work**

1. An electronic record of actual time worked must be kept on a timesheet or time card. eTimesheets 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.
2. All information must be filled out in detail.
3. Times noted on timesheets must be for the exact time worked with a.m. and p.m. hours noted.
4. Supervisors must approve a student's time worked on eTimesheet 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.
5. 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.
6. 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.
7. Students are not allowed to work at times when their classes are scheduled, this includes online classes. Such arrangements are prohibited by federal guidelines.
8. Timesheets must be properly completed each week. Each department is responsible for making sure that timesheets are accurate and complete.

Students on FWS are not receiving grants or gift aid by participating in the program but are expected to do work to earn their FWS award. Allowing students to "just be there" and approving their time sheets will only hurt the students and undermine the purpose of the FWS program.

Departments should not over hire. If supervisors have indicated the need for a certain number of students but cannot provide those students with sufficient or appropriate work, please contact the FWS office. It is likely that you will be advised to reduce the number of openings on your job descriptions or to cancel jobs altogether.

Supervisory personnel have the final say about retaining or terminating students. If you have questions, please contact the FWS office at [sfa-jobs@osu.edu](mailto:sfa-jobs@osu.edu). Warnings and terminations should always be documented in writing as well as spoken.

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.

The FWS office encourages all departments employing FWS students to obtain or create evaluation forms for student employees. Periodic evaluations will become a tool for the continuing development of the student employees.

## **WORK-STUDY AUDITS**

In order to maintain compliance with federal regulations governing Federal Work-Study, the FWS office may periodically conduct audits of payroll procedures and FWS job duties at the department level. These audits will be unannounced or at short-term notice, and will include an examination of timesheets and timekeeping

procedures to ensure that students are not working during scheduled class hours and that timesheets are properly filled out and approved. The job audit portion will attempt to ensure that students are working within their assigned job descriptions, in the area and for the supervisor specified on the FWS Job Description.

## CHANGES IN ELIGIBILITY TO WORK

The FWS Office may instruct you to terminate or suspend the employment of a student. Often, this is the result of some change in the student's financial aid eligibility that you would not know about until we notify you. **Our policy is to allow all earnings for time worked through the day that we notify you to be paid with FWS funds. Subsequent earnings must be paid with your organization's funds.** We will terminate in the following circumstances if the student has:

- Withdrawn from school for the semester.
- Dropped classes and is enrolled less than half-time (6 credit-hours for undergraduates; 4 credit-hours for graduate students).
- Has received an additional financial aid award that meets financial need.
- Has been academically dismissed.
- 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.
- Had a decrease in budget resulting in decreased financial need that is met or exceeded by other awards and FWS earnings to date.
- Had an increase in Expected Family Contribution (EFC), resulting in decreased financial need that is met or exceeded by other awards and FWS earnings to date.
- Has graduated.
- Has earned the entire awarded amount.

## FWS PAYROLL

FWS students are paid on the bi-weekly payroll through the HRIS payroll system. The official calendar can be found at <https://busfin.osu.edu/buy-schedule-travel/payroll/paydate-schedule>. Each payroll contact is responsible for receiving the timekeeping records for the FWS students working in that department and for keeping them on file in the office.

Chartfield:

- **Org number:** Any of your department's org numbers but should correspond to job description
- **Fund:**
  - Non-revenue units: 014002
  - Auxiliary units (revenue-generating): Any of your department's org numbers but should correspond to job description
- **Account:** 60155

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 the payroll is submitted to HR via HRIS. This information allows the FWS office to compare each student's pay rate with the authorized range, to make sure that the student still meets certain eligibility requirements, and to make sure the student is working no more than the number of hours authorized. We are also able to identify students who may have been paid in error from the FWS account. Student Financial Aid is required by federal regulation to be sure that students who receive funds from this federal financial aid program are eligible for this aid.

The main contact for your org will need to retrieve the **OAF110FWS-Work-Study Status** report from eReports. The Status Report shows each student who was paid that pay period listed by department. This report shows how much each student has earned to date and how much they have left to earn. Payroll contacts should be aware of students who are running out of FWS and notify supervisors in advance so that students can be terminated before earning more than their award amounts. If you need access to this report, contact Candace Washington at [washington.203@osu.edu](mailto:washington.203@osu.edu). Supervisors are encouraged to contact the FWS office before terminating a student who has run out of funds. We are oftentimes able to award additional funds later in the year.

Students who are paid using any account number other than 60155 will not appear on the Status Report. Therefore, the department cannot rely on the Status Report alone to keep track of remaining hours, but should keep departmental records as well. If 60155 isn't being used, work-study funds are not being used.

In SIS, FWS payroll monitoring occurs **during** payroll processing. When payroll is processed, any charges to the FWS fund/account for which the student is ineligible will be automatically charged to your department's 011000 fund and the student wage account 60131.

An Error Report will be sent to your departmental contact to inform them of the errors that occurred during payroll processing. If you believe that any of the completed transactions should be changed, contact our office to discuss the specific situation. We may allow corrections on a case-by-case basis.

### Federal Work-Study Payroll Errors

FWS Payroll Error:	What to do:
No FWS Shared Record Found	Student has not been awarded FWS or has not accepted the FWS award they were offered
Fail Eligibility Test	Student is not meeting Satisfactory Academic Progress Student is not enrolled at least half time Student is ineligible to work because their financial aid is under review
Failed Hours Test	Student worked more than 40 hours during the pay period
Failed Cap Test	Student doesn't have enough remaining work-study funding to cover earnings for this pay period

## FEDERAL WORK-STUDY PROGRAM POLICIES

### Authorization to pay students

The FWS office is responsible for maintaining compliance with federal regulations in the disbursement of all Federal Work-Study Program funds awarded to The Ohio State University. **Therefore, only the FWS office can authorize any department to expend these funds, and the sole authority to decide who is eligible for these funds rests with the FWS office.**

Your department will have to pay any unauthorized charges you submit for payment from Federal Work-Study Program funds. This includes charges for students who do not have FWS awards; 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 FWS office to reasonably monitor the balance of funds, departments can only be permitted to use the FWS fund number 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.**

### Pay ranges

The FWS office reviews all position descriptions that are to be paid from Federal Work-Study Program funds to assure consistency of pay rates across campus. You must pay students a rate of pay that is within the pay range assigned to your job description by the FWS office.

Once you have hired a student on a particular job, you are obligated to pay that student a rate of pay that is within the range as assigned by the FWS office. You may pay any rate that is within that range. If you firmly believe that the student should be paid more or less than the assigned range, your option is to terminate the student from your FWS job and pay the student from department wages at the rate you feel is appropriate, or create a FWS job description that accurately describes the student duties and is classified at the desired rate.

If you feel that a classification is not appropriate and should be adjusted in some way, contact the FWS office to discuss any proposed changes. We may ask you to clarify or amplify the written job description to justify a higher 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 at any time. You do not need permission from our office to increase the rate of pay as long as the new rate does not exceed the top of the pay range.
- To give a student a merit increase that exceeds the pay range for the job description, you must create a new job description in the HR system that justifies the increased pay rate and hire the student on that position number prior to raising the student's pay rate

### **Timesheet retention**

Please retain access to your FWS student time sheets for **four** years following the end of the academic year (e.g., the time sheets for students who worked in the 2015-2016 academic year should be retained until May, 2020). 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, the department must create a new FWS job description that accurately describes the job the student will be doing and enter it in the online FWS job board for classification by the FWS office. This may be done at any time. The student cannot be transferred to the new job until it is activated and a pay rate assigned.

### **Terminations**

As a FWS employer, you may be in a position to release FWS students for any number of reasons. 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 HRIS.
3. Transferring students from FWS to department 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 department wages as long as you do so within the guidelines and requirements of the Office of Human Resources.

### **Federal Work-Study probation policy**

Students who have been dismissed from their FWS employment for poor performance or attendance issues will be eligible to obtain another FWS job, but will receive a written warning from the FWS office and will be considered to be on probation for the remainder of the semester, and the semester following the infraction. Should the FWS office be informed that a student be dismissed from a second FWS job for similar reasons, that student may have the rest of their FWS eligibility canceled for the academic year.

If the dismissal is due to violating the Student Code of Conduct, there may be no probationary period depending upon the nature of the infraction. The FWS office retains the right to revoke work-study eligibility immediately and future eligibility may be nullified depending on the severity of the transgression. Notification will be sent to the student in writing and is not appealable.

Within the confines of honoring the privacy of a student's employment records, the FWS office needs to know the following from the office releasing the student from employment in order to administer the probation policy:

- Student's name and Empl ID
- Job title/position
- Department
- Dates employed
- Supervisor or contact
- Reason for termination

From an HR perspective, the steps taken to release a work-study student from employment is the same for all student employees. Information regarding the dismissal of student employees can be found in section V of [HR Policy Document 10.10](#) and you are encouraged to discuss this process with the HRP for your department.

### **Malfeasance**

The FWS office will refer departmental allegations of misconduct on the part of students working on Federal Work-Study to the appropriate university office for investigation. Allegations of falsification of time records will be referred to Internal Audit; allegations of a criminal nature will be referred to the Campus Police; and allegations of infractions of The Ohio State University Code of Student Conduct will be referred to the Office of Student Judicial Affairs. These offices will pursue investigation and disciplinary action with the department and the student. Students under investigation for misconduct will be ineligible for referral to another FWS job while such an investigation is pending.

Students who are dismissed from their FWS employment for malfeasance (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) and who have been found upon investigation to be guilty of such malfeasance will have the rest of their FWS eligibility canceled for the academic year and will not be eligible to receive FWS awards at Ohio State in subsequent years of enrollment.

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.

## **DO'S AND DON'TS**

### **DO:**

- Keep your job descriptions accurate and up to date.
- Contact the FWS office promptly when there are changes to addresses, phone numbers or department payroll contacts.
- Make sure your students report to the department payroll contact to complete all necessary paper work before they are allowed to work. If this does not happen, the students cannot be paid with FWS funding.
- Make sure your FWS students are assigned to supervisors who can be available during work hours to direct their work and verify their attendance.
- Remember that students may work no more than 20 hours per week/40 hours per pay period, unless otherwise instructed by the FWS office.

- Compare the student's work schedule with their class schedule **EACH SEMESTER** so that there are no conflicts.
- Be sure time sheets accurately reflect the time the student has actually worked during the pay period.
- Check time sheets before they are approved:
  - Did the student work the hours listed?
  - If time was worked during a scheduled class time, is cancellation of the class noted?
- Pay late time at the rate of pay in effect during the pay period in which the hours were worked.
- Submit timesheets for all time worked. If you have late time for more than one pay period back, you may contact the FWS office to request the use of FWS funding. Depending on the circumstances and the amount of funding available at the time, we **MAY** be able to allow the use of work-study funds.
- Be aware that students **MUST** be paid for all hours worked. If students without FWS awards are allowed to work or if time is worked that cannot be paid by the FWS account, they must still be paid for all hours worked. **You do not have the option to tell any student that they will not be paid, even if you feel the error was on the student's part.**
- **IT IS THE RESPONSIBILITY OF THE DEPARTMENT, NOT THE STUDENT, TO MAKE SURE THAT STUDENTS ARE PROPERLY HIRED AND THAT ALL NECESSARY PAPERWORK IS DONE BEFORE STUDENTS ARE ALLOWED TO WORK.** IF YOU HAVE **ANY** DOUBT ABOUT WHETHER A STUDENT MAY LEGITIMATELY WORK ON FWS, **YOU** MUST PREVENT THAT STUDENT FROM WORKING UNTIL YOU HAVE RESOLVED ALL QUESTIONS. Excuses such as, "the student did not complete a timesheet," "the student did not submit a job referral form," etc. will not be accepted. The responsibility rests with the department. If you allowed the student to work, the student must be paid from departmental funds if FWS cannot cover the student's hours. Using the Job Referral Form when hiring will help ensure the student was hired into a FWS position. If you have any additional questions regarding this policy, please contact the FWS office.
- Keep track of all students' earnings so they do not exceed their maximum awards. The Status eReport will assist you with this record keeping.
- Make sure students perform only the tasks listed on the 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. The FWS office will not accept job descriptions which include, "Other duties as assigned."
- Make students correct inaccurate timesheets before approving.

**DON'T:**

- Allow any student to work merely because he or she verbally assures you that they have an FWS award.
- Assume that a student who worked on FWS for you last year will be able to do so again this 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, receive a new FWS award and be hired again each year.
- Permit a student to return to work with the intent to pay them on work-study after the FWS office has terminated them for any reason without verifying with our office that the student is now eligible to work again.

- Promise any student a FWS job without knowing that the student has an FWS award. Only Student Financial Aid can determine whether students will be able to work on FWS.
- Allow students to work more than 20 hours per week/40 hours per pay period unless otherwise instructed by the FWS office.
- Assign a student to work that is not legitimately part of the job description under which they were hired. Students must be working within their assigned job descriptions at all times.
- Allow a student to work unsupervised.

## **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 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.

Federal Work-Study 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, and the Higher Education Reconciliation Act of 2005.

### **Purpose of Federal Work-Study**

The purpose of Federal Work-Study is to provide part-time employment for students who need the income to help meet the costs of postsecondary education and to encourage FWS recipients to participate in community service activities. Additionally, by providing a wide range of employment opportunities in various fields, Federal Work-Study helps students to get work experience related to their educational and career objectives.

### **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, 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 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 awarded 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 awarded 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.

Displacement of regular workers: 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 new 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 FWS Office 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.

Political involvement: 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.

Dues and fees prohibited: 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.

Voluntary services: 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.

Work for an individual professor: 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.

Limitation of employment in profit-making activities: 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;
9. Be registered with the Selective Service, if required.

Some students who are eligible under these criteria may not receive FWS awards 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. The first step in determining and documenting financial need is the student's filing of the *Free Application for Federal Student Aid (FAFSA)*. 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) which 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 Expected Family Contribution is subtracted from the student budget; the resulting difference is the student's financial need. As a need-based federal financial aid program, Federal Work-Study cannot be awarded 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.

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