

15.0 Federal Work Study Program

15.1 HISTORY OF THE FEDERAL WORK STUDY

The Federal Work Study (FWS) Program was originally authorized by the Economic Opportunity Act of 1964. The purpose of the FWS Program is to stimulate and promote the part-time employment of students attending institutions of higher education who are in need of earnings from employment to pursue courses of study at eligible post-secondary institutions. The Higher Education Amendments of 1992 added a second purpose, to encourage students receiving Federal student financial assistance to participate in community service activities that will benefit the nation and instill in the students a sense of social responsibility and commitment to the community.

To participate in the FWS Program, St. Cloud Technical and Community College must enter into a Program Participation Agreement (PPA) with the Secretary of Education. The PPA identifies the general terms to which the school must agree in order to participate in particular Title IV programs. To participate in the Federal Work Study Program specifically, the institution agrees in the PPA to follow **all** regulations applicable to that program.

For FWS, the law specifies a formula, which allocates funds directly to the college on an annual basis for operation of the work-study program. To receive funds, St. Cloud Technical and Community College files an annual application. The annual application is combined with the annual operations report entitled the FISAP, which is submitted each September.

Employment under FWS must be made reasonably available, to the maximum extent of available funds, to all eligible students in the institution in need of such employment. The institution must provide assurances that employment made available from FWS funds, up to the maximum extent practicable, complement and reinforcement of the educational program or vocational goals of each student receiving FWS assistance.

15.2 STUDENT ELIGIBILITY CRITERIA

In order to be eligible for employment under the Federal Work Study Program, a student must meet all the general eligibility requirements for Title IV financial aid programs. As with the other campus-based programs, less than half-time students are eligible for FWS funds if they meet all other eligibility requirements. Graduates as well as undergraduate students are eligible for the FWS Program. To be eligible, a student must also demonstrate financial need. In determining the portion of the student's financial aid package to be awarded as FWS, St. Cloud Technical and Community College considers not only the student's financial need, but the number of hours per week the student can work, the length of the academic program or period of employment, the anticipated wage rate, and the amount of other assistance available to the student. St. Cloud Technical and Community College only awards FWS employment to a student if the FWS, combined with the other resources the student receives, does not exceed the student's financial need. No minimum or maximum award of Federal Work Study is set either by statute or by regulation. St. Cloud Technical and Community College sets a \$6,000 limit on the size of an individual student's award for each award year, again with the understanding that the student must show a minimum of that dollar amount in need.

Students may be employed under FWS during periods of non-enrollment. To be eligible for FWS employment during a period of non-enrollment, a student must document enrollment for the institution's next regular session. This option is typically only used in the summer. The college exercises all due care in assuring that any student who accepts employment during a period of non-enrollment does so in good faith.

Students at St. Cloud Technical and Community College employed under the work-study program remain eligible for their award until one of the following occur: 1) withdrawal or graduation from college, 2) entire award earned, or 3) student placed on academic warning.

15.3 FEDERAL RESPONSIBILITIES

The Department of Education's responsibilities in the FWS program mirror its responsibilities under the FSEOG program. These responsibilities include setting policy, distributing allocated funds, and monitoring the use of those funds.

15.4 INSTITUTIONAL RESPONSIBILITIES

- Determines the student's eligibility and the actual amount of the FWS award.
- Ensures that the jobs are with eligible employers and meet the conditions, limitations, and restrictions for the specific type of employer.
- Secures a contract from every off-campus FWS employer, which includes all the information required by the program regulations.
- Develops job descriptions for all FWS jobs, making sure that all jobs are non-political, nonsectarian, and do not involve the displacement of regular employees.
- Establishes wage rates for all FWS jobs in compliance with the Fair Labor Standards Act. At present, a student must be paid at least the federal minimum wage. No maximum wage rate has been established.
- Monitors both on-campus and off-campus FWS employment, ensuring that students are properly paid, documentation is properly maintained, and that students are properly supervised. Students must be paid at least once a month .
- Monitors employment conditions of all FWS jobs.
- Provides the appropriate amount of matching funds and Federal share of wages earned under the FWS program.
- Establishes a system for recording and monitoring the FWS hours worked by each student, again ensuring that students' earnings do not exceed their need.
- Utilizes required amounts for community service employment.

15.5 PROGRAM FUNDING/FEDERAL SHARE

Employers matching funds and the Federal share make up the funds for FWS. The following is a breakdown of the shared responsibility:

The maximum Federal share of Work Study compensation may not exceed 75% for work in the public interest. However, the employer can provide more than their established percentage of the student's compensation (currently 25%), thus reducing the federal share. A 100 percent federal share of the students' FWS wages is authorized at St. Cloud Technical and Community College if he or she is employed as a reading tutor of preschool-age children and children in elementary school and if the work performed by the student is for the school itself, for a federal, state, or local public agency, or for a private nonprofit organization. Schools deemed eligible as Title III schools do not need to contribute a non-federal share.

15.6 USE OF FEDERAL WORK STUDY FUNDS BY THE INSTITUTION

Funds allocated to St. Cloud Technical and Community College under the Federal Work Study Program may be used only to:

- Pay the federal share of FWS wages
- Carry up to 10% of the annual allocation back for expenses during the prior award year or forward for use during the subsequent award year

- Transfer up to 25% of the annual allocation to its FSEOG program
- Administrative cost allowance

15.7 REQUIRED COMMUNITY SERVICE EMPLOYMENT

St. Cloud Technical and Community College must spend at least 7% of its entire FWS allocation to compensate students employed in community service activities beginning with the 2000-2001 award year. Community services are defined as 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. Starting with the 2000-2001 award year, to meet the community service requirement, a school must use FWS to pay students employed in at least one:

- △ Family literacy Project
- △ Reading tutoring program for children who are preschool age or in elementary school.

15.8 PAYMENT PERIOD CROSSING TWO AWARD YEARS

If a student's pay period crosses award years, the student must be paid from funds for the appropriate year. The student should be paid for compensation earned through June 30 with funds allocated for the first award year, and for compensation earned beginning July 1, with funds allocated for the following award year. The exception to this rule occurs when an institution carries forward or carries back FWS funds to pay wages.

15.9 ACADEMIC CREDIT FOR WORK STUDY

St. Cloud Technical and Community College does not allow a student to receive academic credit from the work performed in a work-study position.

16.0 Minnesota College Work Study Program

16.1 PROGRAM OBJECTIVES

To assist students in meeting their financial needs, to provide students with valuable work experiences, and to provide nonprofit service agencies, handicapped persons, and persons over age 65 with low cost student assistance.

16.2 INSTITUTIONAL APPLICATION

In order to participate in the State Work Study Program, the Financial Aid Office at St. Cloud Technical and Community College must complete the application form sent to the school in May with an estimate of the amount of funds necessary to meet the financial needs of their students for the next fiscal year (July - June). Based upon the allocation formula established by MOHE, they will calculate each college's allocation. If the college's estimate of need for Work Study funds on the application form is less than the allocation formula amount, the school will receive its estimated amount, adjusted for prior year utilization of funds. If the college's estimate is greater than the allocation formula amount, the school receives the allocation formula amount calculated by MOHE, adjusted for prior year utilization of funds. St. Cloud Technical and Community College may use up to 30% of its initial allocation to fund student work study positions in the for-profit sector if the position is directly related to the student's field of study.

Program funds are allocated to MOHE by the state legislature. Twenty-five percent (25%) of the total Work Study funds allocated to St. Cloud Technical and Community College will be disbursed in July. If the school has satisfactorily completed and submitted all required reports, program information, and refunds for the previous fiscal year by August 10, MOHE will disburse another 50% of the current year allocation amount in September and the remaining 25% in December. Reallocations are scheduled if funds are available in November, January, March, May and June.

16.3 STUDENT ELIGIBILITY

The student must be enrolled on at least a half-time basis in a degree, diploma or certificate program. Half time is defined for undergraduate students as a minimum of six credits per term. When awarding Work Study to students, priority must be given to students enrolled at least 12 credits.

The student must be a Minnesota resident attending a Minnesota school. The student must be a citizen or permanent resident of the United States.

In order to be employed through this program, the student must demonstrate financial need using the federally approved needs analysis. Financial need means the amount of monetary assistance necessary for a student to meet educational costs, after parental and student contribution determined by the financial need analysis, are subtracted from the student's educational costs. The form used by St. Cloud Technical and Community College to document the needs analysis is the Free Application for Federal Student Aid (FAFSA). The amount of assistance offered the student cannot exceed the amount of the financial need calculated through use of this need analysis.

The student must maintain satisfactory academic progress to remain eligible for the Work-Study Program.

16.4 EMPLOYER ELIGIBILITY

Under the Minnesota State Work Study Program, the following are eligible employers:

Any post-secondary institution that is eligible to participate in the Minnesota State Grant Program.

Any non-profit, non-sectarian agency located in Minnesota.

A private, for-profit employer that employs a student as an intern in a position directly related to the student's field of study that will enhance the student's skills in that field.

Any handicapped person who has a physical or mental impairment which limits one or more life activities, and who could benefit from student assistance in or about the home residence.

Any person over 65 years of age who could benefit from student assistance in or about the home residence.

16.5 INSTITUTIONAL RESPONSIBILITIES

- St. Cloud Technical and Community College must make a reasonable effort to place Work Study students in eligible off-campus employment.
- The financial aid officer must monitor each State Work Study student's continued eligibility and communicate with appropriate employers regarding changes in status as necessary.
- The school must obtain a written contract between the school and the prospective off-campus employer before a student begins work. In this contract, the employer agrees to abide by the rules and regulations of the Minnesota Work Study Program and affirms its eligibility as a State Work Study Program employer.
- Before a student begins work, a work contract must be signed by the student, the school, and the employer. The work contract documents the nature of the work, the hourly wage, and the percentage of earnings, which the employer will pay. When the school is the employer, a work contract is still signed by the student and their supervisor for file purposes. A copy of the work contract in all cases is kept in the student's financial aid file and is subject to MOHE audit review.
- St. Cloud Technical and Community College, with the employer, must develop a program of supervision that is consistent with the nature of the work study assignment and the needs of the individual student.
- The school must maintain payroll records, which verify the amount of each student's wages and time sheets, signed by the student and the supervisor, supporting the total hours worked.

16.6 POSITION OFFERED BY THE EMPLOYER

Each position offered by the employer is reviewed by the financial aid office at St. Cloud Technical and Community College. The position:

1. should not displace regular workers
2. must be non-sectarian, non-profit, and non-political
3. should, if possible, be of educational benefit for the student and,
4. if working for St. Cloud Technical and Community College itself, must be limited to *student services*, the same as it is under the Federal Work Study Program.

16.7 WORK DURING PERIODS OF NON-ENROLLMENT

Students may continue to work during periods of non-enrollment if the student signs a statement of intent to enroll as at least a half-time student the next academic term or provides proof of registration for the next academic term.

16.8 RATE OF COMPENSATION/STATE SHARE OF STUDENT COMPENSATION

Student earnings are determined by an hourly wage and the number of hours worked. There is no predetermined minimum or maximum number of hours, which a student may work; however, the state work study position is not meant to serve as full-time employment. Students are paid only for hours actually worked. The hourly wage must be at least the federal minimum wage.

Students employed under the State Work Study Program are ineligible for unemployment compensation and cannot be paid for sick leave, vacation pay, holiday pay, etc.

The percent of the State share of compensation paid students under the State Work Study Program and the employer's match are determined by MOHE. The match will be the same as the Federal Work Study match, which is 75% for the year. The State share cannot exceed the established percent amount. However, the employer can provide more than their established percentage of the student's compensation, thus reducing the state share.

St. Cloud Technical and Community College reference MOHE Financial Aid Manual, which is updated annually, for in-depth information and regulations regarding State Work Study.