



# Federal Work-Study Experiment Toolkit

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*Best Practices for Private Sector Federal Work-Study  
Partnerships*

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January 2021

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This toolkit is available on the Department's website at:  
(<https://experimentalsites.ed.gov/exp/pdf/FWSExperimentToolkit.pdf>)

The notice for the Federal Work-Study Experiment is available at: (<https://ifap.ed.gov/electronic-announcements/05-20-2019-publication-federal-register-fws-experiment-under-experimental>)

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## Introduction

Surveys show that while students and faculty believe that college graduates are well-prepared to enter and succeed in the workforce, employers largely disagree.<sup>1</sup> Whereas in the past, degrees served as effective signaling mechanisms to ensure employers that potential new hires had the intellectual capacity, resilience, and “grit” needed to be successful in the workplace, today many employers find a degree, alone, to be an insufficient indicator of workforce readiness.<sup>2</sup> Instead, employers are placing a greater emphasis on an individual’s work experience when making hiring decisions. As a result, it is imperative that students have opportunities during their college years to build a work history and learn critical workplace skills.

The Federal Work Study (FWS) program could provide these valuable work experiences to students; however, today over 92 percent of FWS jobs are on-campus jobs that may have little connection to a student’s major or future career goals. These jobs may not help students understand what will be expected of them as they begin their professional careers in a non-academic environment. The FWS program has favored on-campus jobs or community service jobs, which may short-change students as they prepare for life after college. Institutions that participate in the FWS program are required to spend 7 percent of their Federal funding allocation to support students in community service jobs and at least one FWS student at each participating institution must work as a reading tutor or serve in a family literacy program.

While community service and advancing literacy are worthy activities, the experience students gain while working in those jobs may not serve them well as they pursue post-graduation employment. In addition, without experience working in the private-sector, students may be unaware of the many opportunities available in high demand fields and may miss out on the chance to better prepare for those jobs.

To close the wage gap that persists between low-income and higher-income students as they enter the workforce, we need to leverage the power of the FWS program to provide opportunities

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<sup>1</sup> Jeremy Bauer-Wolf, “Overconfident Students, Dubious Employers, *Insider Higher Ed*, February 23, 2018, <https://www.insidehighered.com/news/2018/02/23/study-students-believe-they-are-prepared-workplace-employers-disagree>.

<sup>2</sup> *The Chronicle of Higher Education*, “The Role of Higher Education in Career Development: Employer Perceptions,” December 2012, <https://chronicle-assets.s3.amazonaws.com/5/items/biz/pdf/Employers%20Survey.pdf>

for low-income students to be exposed to prospective employers and gain the kind of work experience that will make them stand out as the best candidate for a future employer. FWS is a financial aid program, but it has the capacity to also be an education and employment opportunity program.

In addition, while it may have been true in the past that college students generally worked no more than 10 – 15 hours per week, today's student is likely to work almost twice as many hours to support themselves, their families or simply to meet the rising cost of attendance.<sup>4</sup> As a result, some students decline their FWS award in order to seek higher paying employment or a job where more hours are available. Unfortunately, this means that students miss out on the opportunity to earn wages that will not count against them in future Federal student aid needs analysis, since FWS wages are not included when determining financial need during subsequent award years.

<i>Employer v. Student Perception of Proficiency in Career Readiness Competencies<sup>3</sup></i>		
<b>Competency</b>	<b>% of Employers that Rated Recent Grads Proficient</b>	<b>% of Students Who Considered Themselves Proficient</b>
Professionalism/Work Ethic	42.5%	89.4%
Oral/Written Communication	41.6%	79.4%
Critical Thinking/Problem Solving	55.8%	79.9%
Teamwork/Collaboration	77.0%	85.1%
Leadership	33.0%	70.5%
Digital Technology	68.5%	59.9%
Career Management	17.3%	40.9%
Global/Intercultural Fluency	20.7%	34.9%

<sup>3</sup> *Job Outlook 2018* and *The Class of 2017 Student Survey Report*, National Association of Colleges and Employers, <https://www.insidehighered.com/news/2018/02/23/study-students-believe-they-are-prepared-workplace-employers-disagree>.

<sup>4</sup> *Working While in College: Weighing the pros & cons*, The College of St. Scholastica. <http://www.css.edu/the-sentinel-blog/working-while-in-college-weighing-the-pros-and-cons.html>

Against this backdrop, on May 20, 2019, Secretary Betsy DeVos announced her intent to launch the Federal Work Study (FWS) Experiment, which provides participating post-secondary institutions with increased regulatory flexibilities and encourages them to significantly increase the number of private-sector jobs available to FWS students. It also allows institutions to pay FWS wages to students engaged in important work-based learning opportunities, including those required as part of the student's major or program.

*“For decades, the Federal Work-Study program has allowed students to support themselves while earning a college degree, but for too long, the majority of the work options students have had access to have been irrelevant to their chosen field of study. That will change with this experimental site. We want all students to have access to relevant earn-and-learn experiences that will prepare them for future employment.”*

*Secretary Betsy DeVos*

While the benefits of work-based learning to students, employers, and post-secondary institutions are many, the Department recognizes that it can be challenging for institutions and employers to develop the partnerships required to ensure students and their employers have a positive FWS experience. Employers may be unfamiliar with how the FWS program works and may need assistance from campus leaders to develop FWS jobs that align with a student's major and class schedule. Similarly, financial aid administrators may have little experience working with private sector employers and may need to enlist the assistance of other campus leaders to identify and help students find and succeed in a private-sector FWS job. Therefore, we have created this toolkit to share best practices to assist institutions and employers create and maintain successful FWS partnerships.

## Federal Work-Study: Introductions to The Basics

In 1964, in response to President Lyndon B. Johnson's declared War on Poverty, Congress passed the Educational Opportunity Act, which included a program that provided grants to colleges and universities for the part-time employment of students from low-income families. That program,

originally called the College Work Study Program, was incorporated into the Higher Education Act of 1965 and became the Federal Work Study (FWS) program as we know it today. Funds under the original FWS program were allocated to states, and institutions were required to apply for the portion of funding they needed to serve their students. Regional panels, which were convened by the federal Office of Education, reviewed applications and made recommendations regarding the level of funding an institution should receive.

Although the current FWS program allocates FWS funds directly to institutions, those early state-based awards continue to largely determine the amount of funding an institution receives today. As new institutions entered the program decades ago, Congress established a “base guarantee” to ensure that historical program participants would not receive reduced funding as more institutions entered the program. As a result, wealthier, private institutions that participated in the early years of the program continue to receive larger FWS allocations than many public institutions, even when a public institution serves a larger number of low-income students. While the Department believes that a new allocation methodology is required – one that awards funding based on the number of low-income students served – that change cannot be introduced through this Experimental Site. Only Congress can solve that problem.

However, the Experiment can be used to identify other changes that would benefit students and make administering Federal student aid more efficient and effective. Under the regular FWS program, students may be employed by the school in which the student is enrolled, or the institution may arrange off-campus employment with federal, state, or local public agencies as well as private, nonprofit and for-profit organizations. Off-campus jobs with federal, state, or local public agencies or private, nonprofit organizations must be in the public interest while off-campus jobs with private, for-profit organizations must be academically relevant, to the maximum extent possible. Therefore, the inclusion of private sector employers as FWS employers is not, itself, a new component of the FWS program. Instead, it is an underutilized option.

Under the regular FWS program, participating institutions must use at least 7% of their base FWS allocation to employ students in community service jobs, and at least one FWS student must be employed in a reading or literacy project. In addition, only 25 percent of an institution’s annual

allocation may be used to support FWS students employed in private-sector jobs. Institutions may be reluctant to invest time in seeking private-sector FWS opportunities for students if only 25 percent of the institution's FWS allocation can support students in these jobs. Further, current limitations on the amount that schools can spend on job development activities may prevent them from hiring the staff needed to cultivate and maintain strong relationships with employers and monitor FWS students who work off campus.

Under the regular FWS program, schools can use a portion of the funds to support Job Location and Development (JLD) programs. However, the amount of FWS funding that an institution can dedicate to JLD activities is limited to the lesser of 10 percent of their FWS allocation or \$75,000, and our data show that few institutions take advantage of this opportunity. Therefore, under this experiment we are providing supplemental funding, increasing the amount of funding that can be dedicated to JLD programs, and permitting institutions to contract with third-party intermediaries that can bridge the gap between employers and institutions and help identify and place students in off-campus FWS jobs. The jobs identified or developed using JLD funds may include both community service and private-sector jobs and are available to both FWS and non-FWS students. Importantly, a school is permitted to use a portion of its JLD program funds to identify apprenticeship opportunities, regardless of whether apprentices served are recipients of federal student aid.

## Goals of The Federal Work-Study Experiment

The FWS Experiment seeks to expand the number of private-sector and off-campus job opportunities available to FWS recipients, as well as to permit FWS students to work more than the typical 10 hours per week if necessary and appropriate. In addition, the Experiment recognizes that students engaged in required externships, clinical rotations or student teaching are gaining valuable work-based learning experience, and as such, should be able to earn FWS wages, if eligible, for some or all of that work. After all, many students are unable to continue working their outside job while engaged in full-time externships or other required work-based learning experiences.



Through the FWS Experiment, the Department wishes to determine whether changes in the FWS program's requirements would: incentivize institutions and employers to work together to expand the opportunities made available to FWS students and to see if those changes increase a student's FWS earnings; increase the likelihood that a low-income student will accept their work-study award, as opposed to seeking outside employment that pays a higher wage or provides more hours; and improve student outcomes, such as retention, graduation rates, and job placement opportunities as a result of a more robust paid work opportunity that aligns with the student's academic program or career goals. Though difficult to measure, we also seek to understand any additional effects that result from stronger partnerships between institutions and private-sector FWS partners, such as greater participation by employers on program advisory boards and more responsiveness on the part of institutions to suggestions and requests employers make. Through this Experiment, the Department seeks to learn whether:

- additional flexibilities provided to institutions will increase the number of private sector opportunities available to students, as well as the wages students earn and the number of work hours available to them if employed in an off-campus FWS job;
- new and more flexible work opportunities will: 1) increase the number of FWS eligible students who accept the FWS award offered to them; 2) improve student satisfaction with the program; and 3) improve college completion, job placement, and earnings outcomes;
- efforts to reduce wage sharing requirements among private sector FWS employers and eliminating caps on how many FWS dollars may be spent to support students engaged in private-sector jobs, will encourage institutions to identify and offer more private-sector FWS job opportunities for students;
- allowing institutions to use additional funds for Job Location and Development programs increases an institution's inclination and ability to cultivate and maintain relationships with private-sector employers and better oversee the program when more students are placed in off-campus jobs;
- allowing institutions to use JLD funds to contract with third-party intermediaries will increase a school's utilization of JLD funds to identify new private sector job opportunities, including apprenticeship opportunities, for students.; and

- using FWS funds to pay eligible students who are completing required work-based learning experiences – such as clinical rotations or student teaching – will improve their program retention and completion rates or reduce the amount of Federal student loans these students borrow.

## Information for Employers

Because employers may be less familiar with the basic opportunities and requirements of the Federal Work Study program, this section of the toolkit is designed for them and includes a high-level overview of the program as well as information about how to engage with institutions and students to establish successful FWS opportunities.

### Getting Started

#### Employing a Federal Work Study Student

A school that participates in the FWS program must make FWS jobs reasonably available to all eligible students at the school and must ensure that its policies and practices do not discriminate against persons of a particular race, religious, sex, or national origin. However, it is permissible for a FWS employer to designate minimal qualifications for the position they are making available, such as being a third-year student, being enrolled in a particular program, or having particular skills related to the job. A potential FWS employer is permitted to utilize an application and interview process to select a successful candidate(s) from among a group of interested FWS-eligible students. Employers retain the ability to select from among a pool of eligible and interested students that fit their unique needs.

It is important for an off-campus employer to make clear in the FWS job description, and when communicating with students, how many and which hours the employer will expect the student to work, whether or not there are additional hours available to FWS students beyond those that receive FWS support, where the job is located, and whether the company provides any transportation assistance or other benefits to FWS employees. Also, if there are limits on the duration of employment, such as jobs available only in the summer, the job posting should make that clear. Finally, while employers must pay at least the minimum wage required by applicable state or Federal law, they are encouraged to pay a wage that is commensurate with the job requirements, the level of skill required to do it, and wages paid to non-students who hold similar positions.

### Paying a Wage to FWS Students: Requirements and Limitations

Off-campus employers and institutions generally sign employer agreements that specify the number and type of FWS jobs that will be made available, the requirements a student must meet to qualify for the job(s), the wage share an employer plans to or must pay, and whether the institution or the employer will issue paychecks to the student worker(s). There may be benefits of having the institution serve as the employer of record, including that the institution will ensure that wage share requirements are met and that student work hours have been properly recorded. In addition, in such a case the institution is responsible for paying any required payroll taxes, and for providing the appropriate tax forms to students. When the institution serves as the employer of record, the outside entity will be asked to make a payment to the institution to meet their wage sharing requirements. The payment can occur at any time agreed to by the institution and the employer, and can occur on a student-by-student basis or for multiple students through a single payment; however, those funds may be used to cover payroll only for the number of hours a student has already worked.

On the other hand, private-sector employers may wish for the FWS student to be their employee in order to ensure that the student understands the employer's expectations and that the employee abides by the company's policies and procedures. In addition, if the employer plans to employ the student for hours beyond those supported by FWS wages, it may be less complicated for all involved if the outside entity pays wages directly to the student. In this case, the institution would transfer the FWS wage-share to the employer after the student has performed and documented the required work hours.

Under the regular FWS program, the federal share of FWS wages paid to a student may not exceed 75 percent, except in the case of private-sector employers who must pay at least 50 percent of the wage share.<sup>5</sup> However, small businesses participating in the FWS Experiment will be required

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<sup>5</sup> *Note:* The federal share of wages paid to students may be 100% when the student: is employed as a reading or mathematics tutor; is performing family literacy activities in a family literacy project; or is employed in community service activities and is performing civic education and participation activities in a project, as defined at 34 CFR 675.18(g)(4). The federal share can be as much as 90% for students employed at a private, nonprofit organization or a federal, state, or local public organization or agency, under specific circumstances. (See: 34 CFR 675.26(a)(2)). The federal share may be 100% for all FWS positions, except for those at private, for-profit organizations, at a school that

to pay only 25 percent of a student's FWS wages, therefore meeting the same requirements as the institution or a non-profit organization. An institution or employer must meet its wage share requirements using funds from non-Federal sources. Only the amount paid for FWS wages, and not administrative or indirect costs, can be included toward meeting the matching requirement.

When private-sector jobs are included in the FWS program, employers and institutions enter into formal agreements that specify what the wage share requirements are, who pays the wages, and who supervises the student when at the job site, among other things. Examples of agreements used by a variety of schools can be found in Appendix A. Notably, it is permissible for the institution to require prepayment of the non-federal share at the beginning of a payment term or for the institution to pay the non-Federal share out of their own non-Federal funds and be reimbursed by the employer at the end of a payment term.

In the event that the employer wishes to employ the FWS student for more hours than the FWS award supports, FWS funds, including the wage share, are expended first. Students may not be paid any more money from the institution's FWS account than their level of eligibility, as determined by the Department's Federal Student Aid office. Once FWS funds are exhausted, the employer may pay wages directly to the student or the employer may transfer the full amount of a student's wages to an institution and the institution may continue to pay the student; this all depends on the institutional/employer agreement. For wages paid in excess of the student's FWS eligibility, there is no matching requirement.

If an employer wishes to employ a student for more hours than the FWS award can support, they may do so, however, they will be responsible for 100% of the wages, unless otherwise specified in the institution/employer agreement. With the FWS experiment, there is no limitation on additional hours a FWS is permitted to work as long as the employer complies with the State's wage/labor laws and the FWS job does not interfere with the student's participation in his or her academic program. An employer is required to comply with all existing FWS and federal and state

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is designated as a Title III or Title V eligible school. (See: 34 CFR 675.26(d)(2)(i)(A). The employer may choose to contribute more than the minimum required nonfederal share.

labor requirements. As long as the student is not required to work during their class time, they are able to work 40 hours a week. The employer may agree to pay a larger wage share to increase the number of hours worked and paid by FWS funds. The advantage of such an arrangement is that wages earned under the FWS program are not included as income in a student's determination of eligibility for Federal Student Aid in subsequent years, meaning that for FWS earnings, a student doesn't risk losing eligibility for grant aid simply because they are working hard to supplement their financial aid package with earnings from a FWS job.

One difference that students might recognize between earnings from an on-campus FWS job and an off-campus job is that certain taxes are not required to be paid by a student working in a job at the college or university where the student is enrolled. For example, FICA taxes – which include Social Security, Medicare, and disability insurance taxes – do not apply to services performed by students employed by a school, college, or university where the student is enrolled. As long as the FWS student is employed by the school, FICA taxes would not apply. For this reason, some institutions continue to serve as the Whether the organization is a school, college, or university depends upon the organization's primary function. Additionally, whether employees are students for this purpose requires examining the individual's employment relationship with the employer to determine if employment or education is predominant in the relationship. In a situation where an overaward occurs and the employer is responsible for those wages, FICA taxes would apply if the student is providing services at a non-school, college, or university. If, however, the school remains the primary employer, FICA taxes would not apply.

A significant benefit of the FWS program is that a student's FWS wages, including the non-Federal share, are not included as earnings for the purpose of a Federal Student Aid needs analysis. For example, this means that students may receive a smaller Pell Grant in subsequent years as a result of employment in an FWS job. However, wages paid by an outside employer once the total FWS award is exhausted will be included as income for the purpose of needs analysis. Therefore, although not required by statute or regulation, the institution or employer should, when possible, provide the student with W-2 forms that differentiate between the portion of wages that will be included in a needs analysis and the portion that will not. When this is not available, the best option to differentiate between wages that are included in the needs analysis and those that are

not would be for the student to work with their institution to determine their aid amount and include that number on their FAFSA.

If an institution receives more money under an employment agreement with an off-campus employer than the sum of: a) required employer costs; b) the school's nonfederal share; and c) any share of administrative costs the employer agreed to pay, the school must handle the excess in one of three ways:

1. Use it to reduce the federal share on a dollar-for-dollar basis;
2. Hold it in trust for off-campus employer during the next award year; or
3. Refund it to the off-campus employer.

Regardless of who serves as the employer, the student's FWS position must be appropriate and reasonable based upon the type of work a student may perform, his or her level of skill, and the geographic location of the job. Additionally, an FWS worker may not replace regular employees, including workers who are on strike or those whose positions were eliminated. FWS employees may not impair existing service contracts and FWS employment may not involve the construction, operation, or maintenance of any part of a building used for religious worship or sectarian instruction. The intent of the FWS program is to create new job opportunities. Also, the employer may not solicit, accept, or permit the soliciting of any fee, commission, contribution, or gift as a condition for a student's FWS employment. However, a student is permitted to pay union dues to an employer if they are a condition of employment and if the employer's non-FWS employees must also pay dues.

Neither a school nor an outside employer that has an agreement with the school to hire FWS students may solicit, accept, or permit the soliciting of any fee, commission, contribution, or gift as a condition for a student's FWS employment.

A student may earn academic credit in addition to wages for an FWS job, including an internship, practicum, or assistantship. However, if earning academic credit, the student may not be: 1) paid less than the student would be paid if no academic credit was awarded; 2) paid for receiving instruction in an academic setting, except in the case of an apprenticeship, where students may

be paid for completing hours spent receiving didactic education; and 3) paid unless the employer would normally pay a person for the same job.

Undergraduate students are paid on an hourly basis only, while graduate students may be paid either hourly or as salary. Undergraduate FWS students cannot earn commission or fees for their work. Regardless of whether the FWS position is on- or off-campus, the institution is responsible for making sure that the student is paid only for the hours they actually worked.<sup>6</sup> The number of hours a student is allowed to work is determined by the institution in partnership with the student and the employer. Institutions must recognize that many students need to work more than the 10 or 15 hours per week typical and while working this many hours may not be ideal, it can be helpful if the employer and the institution are partnering for the benefit of the student and helping them coordinate both obligations. Work-related FWS jobs also enrich the academic opportunities available to the students since the job will provide “real world” experiences that allow them to put theory to practice. Therefore, for those students who need to work more hours, the institution is encouraged to allow the student and employer to combine into a single job, the hours supported by the FWS award and any additional hours a student elects to work. Wages must be paid to FWS students at least monthly, but can be paid more frequently based upon the agreement between the employer, the institution, and the student.

To determine the appropriate wage rate, the institution and employer should consider the following factors: 1) the skills needed to perform the job; 2) how much persons with those skills are paid in the local area for doing the same type of job; 3) rates the school or employer would normally pay similar non-FWS employees; and 4) any applicable federal, state, or local laws that require a specific wage rate. Wage rate determinations should not take into consideration the student’s financial need.

An institution is not allowed to use either the federal or the institutional share to provide benefits, such as sick leave, vacation pay, holiday pay, Social Security contributions, workers’ compensation,

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<sup>6</sup> Please see the *FSA Handbook* at: [https://ifap.ed.gov/ilibrary/document-types/federal-student-aid-handbook?award\\_year=2019-2020&](https://ifap.ed.gov/ilibrary/document-types/federal-student-aid-handbook?award_year=2019-2020&)



retirement, or any other welfare or insurance program. A school or employer is permitted to pay benefits from an account not related to FWS funds.

### Scheduling Work Hours

Scheduling can be challenging for students engaged in off-campus employment if the employer and institution do not work together to develop a plan that meets the student's academic and employment needs. In some instances, institutions have developed block schedules that permit the student to complete all of their classroom instruction during two or three days each week, or in the evenings, to allow the student to work during regular business hours or at times when the appropriate supervisors and mentors are available. Zurich North America's apprenticeship partnership with William Rainey Harper College in Palatine, Illinois stands out as the ideal example. Apprentices in this program attend classes two days and work three days of the week. Provided that they remain with the company for a year after graduation, apprentices are given salary, benefits, and classified as full-time employees while in the program.<sup>7</sup>

While some institutions limit the number of hours per week or per pay period that a student may work, there are no statutory or regulatory limits on the number of such hours, provided that no overaward of the Federal wage share occurs. Other institutions provide fixed scheduling throughout an academic program to guarantee that the student will be available for work on the same days and at the same times during each semester of their enrollment. Not only does this help a student juggle work and school responsibilities, it may also help students make childcare and transportation arrangements that can be difficult when schedules fluctuate with each academic term. Still other institutions have standardized the curriculum to enable students to attend other sections of their classes if their work or childcare schedule changes and prevents them from attending their regularly scheduled section.

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<sup>7</sup> Denny Jacob, "Zurich's apprenticeship program makes launching a career in insurance easy," *NU Property Casualty*, November 15, 2019, <https://www.propertycasualty360.com/2019/11/15/zurichs-apprenticeship-program-makes-launching-a-career-in-insurance-easy/>.

### Job Description Requirements

Written job descriptions are required for all FWS positions, must be made available to all eligible FWS students, and must be maintained by the institution as part of its policies and procedures manuals. Written descriptions allow the student to determine whether he or she is qualified for the job, if the job is related to his or her academic or career objectives, and if the job is of interest. The institution may wish to provide a template to the employer to ensure consistency in the information provided, but there are no prohibitions against an employer including its corporate logo or mission statement in the advertisement to help students recognize the employer and the opportunities it might provide. FWS job descriptions should include the following elements:

- Position name;
- Position classification (for example, laboratory assistant I versus laboratory assistant II);
- Employer's name and address;
- Department and/or office in which the student will be employed;
- Location where the student will perform duties;
- Name of student's supervisor;
- Purpose or role of the position within the organization;
- Duties and responsibilities associated with the position;
- Rates of pay for the position;
- General qualifications for the position and the specific qualifications for the various levels or rates of pay;
- Beginning and ending dates for the student's employment;
- Procedures for determining a student's rate of pay; and
- Evaluation procedures and schedules.

### Alignment Between the Student's Academic Program and FWS Job

In order to make sure that the FWS job contributes to – rather than detracts from - the academic experience of the student, the employer and the institution will need to work collaboratively. The employer may wish to consult an institution's website to see which programs are available to students that are in alignment with opportunities the employer could provide. An employer may also wish to consult the College Scorecard to get a sense of how many students complete a

particular program each year and the employment outcomes those students enjoy.<sup>8</sup> It is important to keep in mind, however, that the College Scorecard reports earnings and debt only for those students who qualify for and receive Federal Student Aid, so the results may not reflect the average earnings of a school's entire population of students.

In addition, the Scorecard does not differentiate between part-time and full-time work. Therefore, programs that cater to the unique needs of adult learners may post lower earnings simply because the students served by the program choose to raise children full-time and work part-time or are earning a degree in preparation for the time when their children enter school and they plan to return to work.

At many institutions, the FWS program is managed by the Director of Financial Aid. At others, the FWS program might be managed by the Director of Student Services or the Director of Career Services. Private sector employers are encouraged to contact the institution to express interest in serving as an FWS employer and to set up an appointment to meet with campus officials to determine which academic programs align with the opportunities they can provide. In this Experiment, the Department is requiring institutions to involve senior campus leaders because we believe it will take a campus-wide commitment in order to ensure that students are supported in their learning and earning needs. Therefore, we recommend that employers interested in participating in this Experiment contact the President or the Provost's office to express interest in providing an FWS job. Most institutions provide the name and contact information for these leaders on their website. An employer may also reach out to the Director of Financial Aid (or another appropriate office) on a campus to learn more about the opportunities to participate.

After making initial contact, the institution should facilitate a meeting between the employer and the appropriate faculty, career services advisors, and financial aid leaders to ensure that the FWS job opportunity aligns with one or more academic programs at the institution and to help design a partnership that will work for all involved. For example, faculty can provide employers with information about the program's learning objectives, required courses, and the knowledge, skills,

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<sup>8</sup> The College Scorecard is an online tool for students and families to compare the cost and value of higher education institutions. For more information see: <https://collegescorecard.ed.gov/>.

and abilities that the student should gain at each stage of the program. They can also discuss scheduling opportunities that balance a student's need to fulfill his or her academic and work obligations.

Faculty can also make recommendations about when, in a student's program, he or she should be prepared to meet the requirements of a given private-sector FWS job. For example, some jobs may be appropriate for students in their first year of college whereas other jobs may require skills that students are unlikely to possess until later in their programs. Some private-sector FWS jobs may not align specifically with a particular academic program but may instead require writing or critical thinking skills developed through the liberal arts component of any academic program. Private sector FWS jobs need not be limited solely to students enrolled in occupationally-focused programs. In fact, the Department encourages employers to offer opportunities to students enrolled in liberal arts programs to help those students explore work opportunities that will allow them to apply the knowledge and skills they have gained.

The employer should identify to the institution the appropriate point-of-contact at the company or organization who will oversee FWS jobs and students and ensure that FWS students are engaged in appropriate work. This person should also ensure that FWS students are receiving appropriate supervision and are performing their job as expected. Similarly, the college should identify a point-of-contact for employers to work with to confirm that a student is performing as expected or to seek assistance in situations when the student is not meeting expectations. Many institutions employ student support services experts who can help a student manage outside challenges that may be interfering with their workplace performance or can help students improve work-specific skills or soft-skills needed for workplace success.

In the event that a student employed in a private-sector FWS job changes his or her major, and the new major does not align with the FWS job, the student is not required to leave the job and can be allowed to finish out the FWS period. The student may still be interested in pursuing the kind of work offered by the private-sector FWS employer even if he or she enrolls in a different program or major. However, a student who changes majors or programs may no longer meet an employer's qualifications for the job or the student may lose interest in the job. In such a case,

the employer could alert the institution to the potential problem and work with the institution and the student to plan next steps. Institutions may wish to include instructions for how to handle such situations in the employer agreement.

### Hiring a FWS Student

The employer and the institution should agree to the method by which students will be selected to participate in a private sector FWS job. All FWS jobs must be posted so that all FWS students have access to information about the job. However, as stated above, employers can specify the qualifications and skills required to qualify for an individual job and employers may require applications and/or interviews prior to selecting successful FWS employees. The method and process of hiring FWS students should be included in the employer agreement signed by the employer and the institution. Employers are encouraged to conduct interviews at the institution, but this is not required. The employer should provide a timeline for making a hiring decision so that unsuccessful candidates have the opportunity to look for different FWS opportunities. Notably, FWS funds may be used to pay a student for training, as long as the training does not exceed twenty hours.

### Conditions of Employment

The goal of the Experiment is to provide both academic credit and the opportunity to earn compensation. The Experiment's guidelines include the following:

- FWS workers may not be paid less than they otherwise would be paid, simply because academic credit is awarded for the FWS job;
- FWS workers may not be paid for receiving instruction in a classroom, laboratory, or other academic setting, except in the case of apprenticeship programs where paid didactic instruction is a requirement; and
- FWS workers may not be paid for the work they are performing unless the employer would normally pay the person for the same job.

The minimum wage rate required for a student employed under the FWS program is the minimum wage rate required under section 206(a) of the Fair Labor Standards Act of 1938. FWS employers are required to pay students at least the federal minimum wage rate, unless the state or local law in which the student will be employed requires a higher minimum wage than the federal rate, then the school is required to pay that student the higher of the two rates.

All FWS work has specific conditions and limitations for employment. First, all FWS jobs must align with federal, state, and local laws. The jobs must be governed by conditions that are appropriate and reasonable according to the type of work performed, location of the job, and the employee's proficiency.

To comply with the Fair Labor Standards Act of 1938, all employees must be paid for the hours that they work. The Act prohibits employers from accepting voluntary services from paid employees. The Small Business Job Protection Act of 1996 established a sub-minimum and/or training wage that is below the minimum wage; however, this may not be applied to employees within the FWS program.

FWS positions have prohibitions regarding the use of federal funds to pay students for their involvement in constructing, operating, or maintaining parts of a building used exclusively for religious worship or sectarian instruction. In addition, FWS positions are also prohibited from any political involvement. Political support or affiliation may not be a prerequisite or condition for consideration of employment. Students are not allowed to be assigned FWS positions for members of Congress. However, they may be permitted to work with staff of a standing committee of a state legislature, only if the selection of staff for the committee and the work performed is done in a nonpartisan manner.

### [Timesheets](#)

The Department expects employers and institutions to work together to coordinate schedules and minimize conflict between academic and employment activities. It is the responsibility of the employer to keep time records for each FWS employee during the length of the program and to make sure they are submitted for payment during each pay period.

The institution's FWS office should assist with record keeping by periodically providing status reports of the portion of the federal and non-federal wage requirements the employer has met. It is the responsibility of the FWS student's supervisor to check and review the timesheet before approval. The supervisor, institution, and student should have a clear understanding of how timesheets and records will be kept prior to the start of the FWS program.

Appropriate documentation of work hours includes:

- Electronic timesheets generated and collaborated with the institution used to document time worked by FWS students. Employers are encouraged to keep their own timesheet documents at the worksite for their own records if verification of the student's submissions is required.
- Times submitted must include the times for hours worked, meaning the time a student begins and ends their work must be recorded (as opposed to simply reporting the number of hours worked).
- Supervisors must document and approve timesheets.
- FWS students are not permitted to work hours in one pay period and submit those hours in a succeeding pay period.
- If work hours are required outside of the 8 a.m. – 5 p.m., Monday-Friday work schedule, such arrangements must be discussed, documented, and agreed to prior to the FWS job beginning.
- Students should not be allowed to be scheduled or to work during hours when their classes are scheduled. If a class is canceled, a student is permitted to work. However, the cancellation must be documented by the teacher, student, and supervisor for reference.

### Supervising FWS Employees

Each FWS student should have a direct supervisor for the duration of their FWS program. Most of the time, it is the same person listed on the job description posting. If the job posting states that

the supervisor will be assigned, the employer must assign a specific supervisor prior to the start of the student's FWS program. The supervisor must be available during the duration of the student's work hours to verify and document the student's hours. In addition, the supervisor must always be available to directly assist in the student's work should they need assistance or have questions.

Supervisors must ensure that students perform only the work related to the job description and compensated for such duties.

### Disciplinary Action

Although FWS is an academic program, the student is still an employee and should the situation arise, a business is permitted to take disciplinary action. In the past, students have been dismissed from their FWS employment due to poor performance or attendance. Prior to such action, however, supervisors should take precautionary steps in providing a brief warning. The supervisor should provide some coaching and enable time for the student to correct his or her behavior.

If a student persists with their actions and violates the institution's or employer's student code of conduct or similar policy or handbook, the business may proceed with termination. If such action needs to be taken to terminate the student, the supervisor should provide a brief explanation of the reason for this action and notify the institution of the action. Employer's should be sure to provide to the institution the reason for the termination, as well as the last date of employment, so that no additional resources are exercised at the expense of the terminated student.

### Other Legal Concerns

In addition to the issues discussed in this section and throughout this Toolkit, the legal arrangements between institutions and employers should address concerns that may arise during the student's FWS employment as well as after the initial partnership period is complete. Although there are no regulations specifically on what specific employment-related legal issues must be included, partners should attempt, to the best of their ability, to address all of the employment-related legal issues in their agreement that are reasonably foreseeable.



Some of the issues that should be included in the partnership agreement include the following. First, workers' compensation insurance requirements for employers vary from state to state. Most states require employers to obtain an insurance policy for workers who become injured or ill due to a circumstance arising from a workplace event. The partnership agreement should address which party – the school or the industry partner – will be responsible for carrying the workers' compensation insurance policy. Second, unemployment taxes can be a major headache for partners. Generally, employers must pay both state and Federal unemployment taxes if: 1) they pay wages to employees total \$1,500, or more, in any quarter of a calendar year; or 2) they had at least one employee during any day of a week during twenty weeks in a calendar year, regardless of whether or not the weeks were consecutive. Additionally, some state laws differ from the Federal law and employers should contact their state workforce agencies to learn the exact requirements and incorporate them into their partnership agreements, where appropriate.

While schools and their employer partners cannot foresee and address every circumstance in their legal arrangements, at the most basic level, the partners, through their agreements, must comply with all applicable federal, state, and local employment laws.

## Information for Institutions

### Waivers Provided by the FWS Experiment

Institutions are encouraged to follow the guidance provided in the FSA Handbook to manage their FWS programs. If you have questions, however, the FSA School Participation Divisions are ready to help. General Compliance Information and Requests can be made to FSA's COC Call Center at 1-800-848-0978 or emailed to: [CaseTeams@ed.gov](mailto:CaseTeams@ed.gov). For operational questions regarding this Experiment or its waivers, please contact us at: [experimentalsites@ed.gov](mailto:experimentalsites@ed.gov). For more immediate and specialized assistance, please consult the FSA website for the contact information for your regional office.<sup>9</sup> However, the Department is providing in this toolkit a list of waivers provided to

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<sup>9</sup> FSA Website for School Participation Division Contact Information: <https://ifap.ed.gov/help-contact-information-school-participation-division>

institutions that are participating in the FWS Experiment under a signed Program Participation Agreement.

<u>List of Regulatory and Statutory Waivers for 2019 Experiment Participants</u>	
<u>Regulatory/Statutory Provision</u>	<u>Effect</u>
34 CFR 675	To the extent it restricts students in FWS to part-time employment, waives regulatory restrictions to enable full-time employment opportunities related to the student's academic programs
34 CFR 675.23	Waives regulatory limits on the amount of an institution's FWS allocation/re-allocation for an award year to pay the compensation of FWS students employed by private, for-profit organizations to 25%
34 CFR 375.26(a)(3)	Waives limits on Federal share of the compensation to a student employed by a private for-profit organization; limit increases to 75% for a small business, as defined in 13 CFR 121
HEA §§442(a)(4)(A) & (B)	Waiver provides additional funding to institutions participating in the experiment, including waiver of the condition that institutions meet the statutory requirements for graduation or transfer of Pell Grant recipients
34 CFR 675.32	Waives cap on the amount of institution's allocation to support a JLD Program; allows for an increase in the amount; institution's specific request must be detailed in its Experiment application and approved by the Department
34 CFR 675.18(g)	Waives requirement that an institution use at least 7% of the sum of its initial and supplemental FWS allocation to compensate students employed in community service activities

### FWS Experiment Allocation Process

The Department allocates additional FWS funding for the FWS Experiment using a combination of 1) each institution's FWS expenditures, as reported on the Fiscal Operations and Application to Participate (FISAP) from the previous award year; and 2) the number of each institution's Federal Pell Grant recipients during the same award year. Each year FSA will distribute 25% of the total amount appropriated FWS funds set aside for the FWS experiment based on the proportion of each institution's FWS expenditures to the total FWS expenditures of all participating institutions, and will distribute 75% based on the proportion of each institution's Pell Grant recipients to the total Pell Grant recipients at all participating institutions.

The final amount will be determined each year of the experiment. If your institution chooses to participate during the 2020-2021 award year, it must have returned the signed Program Participation Agreement (PPA) amendment to the Department by July 10, 2020 in order to be considered for additional FWS funding under the experiment. The Department will provide the institution's additional FWS funding amount and instructions for obtaining those funds in an annual communication to institutions in the spring prior to the award year to which the funding applies.

### Cross-Campus Collaboration

While creating successful off-campus FWS opportunities may take additional effort, the benefits to institutions, to employers, and students are considerable. Thriving and vibrant FWS programs that actively engage business and industry partners will better prepare students for the jobs of the 21<sup>st</sup> century, put students on track to succeed in their chosen field, meet the labor demands of the local economy, and likely contribute to the upward mobility of low-income students and their families.

Institutions seeking to expand the FWS program to include private-sector employers must commit to engaging senior administrators, academic leaders and career services leaders – in addition to financial aid leaders – to ensure that students are correctly matched with potential employers based on the student’s academic goals and the opportunities offered by the employer. Institutions are encouraged to develop appropriate processes, policies, and procedures for private-sector FWS jobs and publish them on the institution’s website so that students and potential employers can easily find them.

Some of the elements the Department recommends, but does not require, for the best institutional policies and procedures include:

- An explanation to students of the purpose and goals of the FWS program, including who students should contact in order to accept their FWS award and pursue an FWS job.
- Information about where to find a list of available FWS positions and associated job descriptions.
- A list of student eligibility requirements to receive an FWS award and to pursue and maintain an FWS job.
- A description of the hiring process for on-campus and off-campus jobs. The description should include the process by which a student should submit his or her application or resume and the timeline for doing so.
- A description of additional requirements associated with some jobs, such as background checks, drug testing, or transportation requirements, if applicable.
- Guidelines for how students will be compensated for their FWS job, including the schedule of FWS payments; requirements and procedures for students who opt to authorize non-

*How to Quickly Improve  
Your FWS Program:*

- *Create hiring procedures that reflect real-world processes*
- *Retention and learning should remain a goal of any FWS*
- *Offer students professional development opportunities*
- *FWS student evaluations should be constructive and helpful*
- *For students engaged in off-campus employment, the campus should designate a point of contact for students and employers to share concerns or seek assistance, if the employer or the employee is facing challenges.*

cash payment of wages as well as procedures for ending that authorization; and the procedures for accurately and timely completing and submitting timesheets.

- An explanation of what a student should do if terminated from an FWS position, including if terminated from an on-campus or off-campus job.
- Lists of Do's and Don'ts for student employees, such as: professional manner and appearance requirements; meeting job requirements and employer expectations; and satisfying all Financial Aid requirements each semester.
- Supervisor responsibilities for submitting or updating job descriptions each academic year; the timeline for submitting job postings, interviewing, and selecting successful FWS candidate schedule for job posting deadlines; interviewing requirements; adjust work schedule to student's class schedule; report hours that the student worked accurately to the proper oversight office; and engage with FWS students to create a positive and productive FWS experience.

It is critically important that students are made aware of FWS program requirements, which many institutions accomplish by providing mandatory orientation sessions before students are placed in their job. While the Department does not regulation orientation sessions, we have heard from successful FWS partners that the following topics are important to include in FWS orientation programs: job placement procedures; identification and explanation of required forms and documentation; office etiquette, including dress code and interacting with supervisors and co-workers; interviewing tips; obtaining the proper acknowledge forms from the employer; payroll procedures; working hours requirements and limitations; recertification procedures; separation procedures; and other relevant topics.

These orientation sessions can provide important information and helpful tips to make students successful in their FWS position. Input from employers in these orientations, or specialized sessions for certain employers, may also help students transition into an FWS position.

### Connecting with Industry Partners: Best Practices for Successful Outreach

For many institutions, building relationships with private-sector partners is the hardest part of creating a successful off-campus FWS program. For this reason, the Department believes that senior campus leaders must support and be involved in the Experiment because they are likely to interact with business leaders, participate in Chamber of Commerce events, and be involved in local economic development activities. Senior campus leaders must play a critical role in cultivating relationships with employers. They must also ensure that faculty and career services staff are engaged in the Experiment to ensure that students are aware of and are well-prepared for private-sector FWS opportunities, that private-sector FWS jobs align with a student's academic program or career interests, and that students and employers receive the support they need to succeed.

#### Quick Tips:

#### Building Lasting Partnerships:

- *Find partners that share your vision and goals*
- *Leadership matters*
- *Be creative!*
- *Ongoing supervision and communication matters*
- *Do not be afraid of long-term commitments*
- *Be patient!*

Academic programs and departments may already have strong relationships with employers and trustees of the college or university may have deep roots in the business community. These relationships should be leveraged to identify potential private-sector FWS jobs available to students.

It is important to remember that these institution-industry partnerships are not built in a day, nor can these relationships, once forged, be left to evolve on their own. It takes commitment and effort to cultivate and maintain strong college-private sector partnerships, but the rewards to all involved, and in particular to students, makes them well worth pursuing.

### Job Location and Development Programs

The Department recognizes that institutions need personnel and other resources to cultivate and maintain relationships with private-sector FWS employers. For that reason, the Experiment provides opportunities for involved institutions to receive more Job Location and Development funds than are provided under the regular FWS program. Under the normal FWS program, an institution may use up to ten percent of its annual FWS allocation, but no more than \$75,000, to

support its JLD Program. However, under this Experiment, additional amounts can be used for the program in order to enable institutions to hire a coordinator or for other functions to further encourage institutions and employers to establish and expand paid internships, apprenticeships, and other work-and-learn opportunities. FWS funds can be used to pay up to eighty percent of the allowable costs of operating a JLD Program, such as staff salaries, supplies, and travel. The remaining costs (twenty percent) are paid by an institution either in cash or in-kind services.

Institutions can partner with other institutions to share a JLD program, and under the Experiment, an institution could contract with a third-party intermediary to support the cultivation of private sector jobs for students. The U.S. Department of Labor has invested considerably in the development of third-party intermediaries, largely to help employers develop high quality apprenticeship programs.<sup>10</sup> However, these organizations could be equally helpful to institutions and employers who are working to develop the full-range of work-based learning opportunities, including FWS opportunities.

JLD funds must be used to identify jobs for both FWS and non-FWS students. In addition, while the Financial Aid Handbook emphasizes the use of JLD funds to identify community service jobs, in fact, these funds may also be used to identify and develop private sector job opportunities for students. The Department is encouraging all institutions to include the cultivation of private sector jobs in their JLD program.

Institutions may benefit from the “spillover” effects of private-sector FWS jobs, including that employers who take an interest in students as future employers may be more likely to participate in program development or reviews, provide subject matter experts who can serve as adjunct faculty or student mentors, and in some cases to provide access to specialized facilities or equipment that a college or university could not afford to acquire or maintain on campus.

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<sup>10</sup> <https://www.apprenticeship.gov/partner-finder>

Institutions that are unfamiliar with opportunities that might exist in the private sector, or that seek to learn more about high-demand careers can turn to a number of resources to learn more. For example, local chambers of commerce or other business organizations, such as Rotary clubs, may have deep knowledge of local employment conditions and opportunities. Trade associations can also be helpful to institutions as they tend to know their members well and can help identify companies or organizations that have strong reputations and are known to be engaged in education and workforce development activities. Elected officials are also typically familiar with the needs of local employers and may be able to facilitate introductions among college and business leaders.

The Business Roundtable and the National Council for the American Worker have already made a commitment to improving workforce preparation and employee education. Institutions may wish to consult membership lists of those organizations to identify employers who have already made a commitment to improving educational opportunities.<sup>11</sup> Workforce Development Boards may also have a deep understanding of state, local and national workforce needs and may have access to funding that could support partnerships between institutions and private-sector employers in addition to FWS partnerships. To identify your institution's local Workforce Development Board, consult with the National Association of Workforce Boards (NAWB) or SkillsUSA.<sup>12</sup> Finally, the Department of Labor's Apprenticeship program includes business organizations, unions, and companies that are already committed to providing work-based learning opportunities and may

### Quick Tip: Career Navigators

*A number of institutions assign "Career Navigators" to students in career pathways. The Navigators assist students in identifying and reducing barriers to education and employment.*

*At Hennepin Technical College in Minnesota, Career Navigators assist students in finding childcare, covering transportation costs, and striking the right balance between work, family, and school.*

*Many potential FWS students are first-generation college attendees. One-on-one guidance and support can make the difference between completion and dropping out.*

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<sup>11</sup> For Business Roundtable members, see: <https://www.businessroundtable.org/about-us/members>; For the American Workforce Policy Advisory Board members, see: <https://www.whitehouse.gov/pledge-to-americas-workers/>.

<sup>12</sup> For the NAWB, see: <https://www.nawb.org/>; For SkillsUSA, see: <https://www.skillsusa.org/>.



be interested in expanding their efforts to engage students enrolled in postsecondary academic programs.<sup>13</sup>

### An Alternative Approach: Sector Partnerships

As an alternative to individual business partners, some institutions have found success in developing or joining “sector partnerships.” Unlike individual partnerships, where institutions tailor their approach to the needs of a single business, in the case of sector partnerships, groups of companies work together with one or more institutions to develop programs or provide work-based learning opportunities to groups of students. This approach leverages the collective expertise of numerous industry partners and in many instances, sector partners identify a single representative who can work with institutions on behalf of the group of employers to streamline the development of employer agreements and standardize opportunities provided to students.

The benefit of this alternative approach is that a student may have opportunities to work with more than a single company or organization during their program, and they will be introduced into a larger employer network that might offer good job opportunities when the student graduates. Additionally, sectors may identify certifications and non-degree credentials that students can earn in addition to the certificate or degree offered by the institution that will improve the student’s long-term employment opportunities. Sometimes sector organizations may be able to offer certification training programs to complement the work that a student is doing as part of their regular academic program.

### Overcoming Barriers to Create Successful, Meaningful, and Rewarding FWS Programs

While there may be challenges to establishing private-sector FWS opportunities, the principal beneficiary of these efforts are students. Graduates who are skilled, knowledgeable, and ready for the challenges of employment ultimately reflect well upon an institution, boosting its reputation and creating new opportunities for future graduates. Employers also benefit by engaging directly in the preparation of students for the demands of work, and by employing students in high-demand fields while they are still in college.

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<sup>13</sup> See:

[https://www.apprenticeship.gov/?utm\\_source=dol\\_gov\\_apprenticeship&utm\\_medium=text&utm\\_campaign=apprenticeship\\_homepage](https://www.apprenticeship.gov/?utm_source=dol_gov_apprenticeship&utm_medium=text&utm_campaign=apprenticeship_homepage).

## Evaluation

One of the most critical aspects of the Experiment is the “Reporting and Evaluation” requirements included in the initial experiment announcement. Participating institutions may be required to submit information to the Department, or its contractor, for an evaluation of the Experiment on their campus.

The evaluation will offer a descriptive analysis of student and institutional outcomes during and following the experiment, but it will not attempt to establish a causal connection between the experimental waivers and the outcomes that are identified, nor will it attempt to measure the precise, independent magnitude of the effects of the waivers.

The research questions that the evaluation will attempt to address include:

- How will an institution’s expenditures of FWS funds for employment at private, for-profit companies change during the institution’s participation in the experiment? How will such expenditures at participating institutions compare or contrast with expenditures at non-participating institutions?
- Will the number of hours that students work per week while receiving FWS awards change during the institution’s participation in the experiment? If so, by how much and under what conditions?
- Will institutions choose to increase the federal share of FWS funds paid to private, for-profit employers during the experiment?
- Will students who are participating in work experiences required by their academic programs (e.g., student teaching or clinical experiences) receive wages for those experiences during an institution’s participation in the experiment? How much will these students be paid, and how many FWS funds will be expended on such jobs?
- Will participating institutions develop Job Location and Development (JLD) partnerships with employers for private-sector FWS opportunities, including apprenticeships?

- Will participating institutions make new or additional off-campus job opportunities available to eligible students?
- Will participating institutions increase the number of formal work-based learning opportunities (such as apprenticeships) available to students?

The Department is interested in assessing the effectiveness of using FWS funds to expand private-sector job opportunities and to support students engaged in program-required externships or student teaching. As part of this goal, even for institutions not initially chosen for the experiment, the Department will be taking an approach that allows the Department to assess the effects of the experiment by comparing the experiences and outcomes of students in prior to and following an institution's participation in the experiment. The Department also notified participating institutions that they may be required to randomly assign certain parts of the waivers to eligible students, enabling the Department to assess the effects of those particular waivers. Participating institutions will be required to collect, maintain, and report information about students involved in the experiment. Information needed for the evaluation may include: 1) the identity of students eligible for FWS and those who choose to take advantage of the opportunities; and 2) the characteristics associated with each student's FWS job or program-required work-based learning, including the number of hours worked, the wages paid, and the identity of the employer. This information would likely come from databases that institutions maintain to administer FWS and complete the Fiscal Operations Report and Application to Participate (FISAP) form annually.

Participating institutions will also be required to respond to annual surveys or interviews that collect information about job development activities relevant to FWS students, including institutions with JLD funds and any unforeseen challenges or opportunities that arise. The evaluation will also include information reported by institutions through the Department's regular data collection systems regarding the enrollment, completion, and withdrawal of students who receive title IV funds while enrolled at the institution during the student's participation in the experiment.

In our May 23, 2019 announcement, the Department stated that we may require participating institutions to use a common form, provided by the Department, to collect qualitative information from students annually about their FWS-supported work opportunities.

## Appendices

### Appendix A: Case Studies in Successful Institution-Business Partnerships

In this section, we will discuss real world examples of successful institution-business partnership programs. There are many such programs across the country, but those the Department has chosen to include here deserve special attention as they embody the spirit of the Experiment and our vision for the future of FWS programs.

#### Local Labor Need Identified; Local Labor Need Met

##### *M-Powered: Fast-Track Training for Manufacturing Careers – Hennepin Technical College*

The M-Powered Program, started in 2004, trains participants for manufacturing careers, primarily serving populations of unemployed, underemployed, and student veterans. M-Powered emphasizes their education plus training model as well as their close partnerships with local manufacturers, who “actively advise, monitor, and support the course and curriculum and hire program graduates.”

Hennepin Technical College’s program was originally started in response to a skilled worker shortage in the local manufacturing industry. The program sought to bring together economic development professionals, a trade association, community-based organizations, and community college leadership to form a comprehensive training program for the local population.

The program offers career pathways to prepare future workers for long-term careers in manufacturing as Computer Controlled Micro-Machining Operators and Precision Metal Stamping Technicians. The pathway is broken up into three phases, for a total of twenty college credits. The first stage is classroom instruction, where students learn how to read blueprints, solve applied math equations, use hand measuring tools, and observe shop safety. In the second stage, students work directly with manufacturing machines in a controlled setting with supervision. In the final stage, student complete four-hundred and eighty hours of “immersion” in the workplace. Once

completed, students are ready to sit for the National Institute for Metalworking Skills exam. Upon passage, students can elect to continue their education or enter the workforce.

As discussed earlier, Hennepin uses Career Navigators to assist students through the program to provide services that the student needs to succeed, including helping the student find childcare, cover transportation costs, and balancing work, family, and school obligations. M-Powered graduates report that they can double their entry-level wages within five years of completing the program.

The success of the M-Powered program is remarkable. Hennepin reports that, after completing all three phases of the program, 97% of students were offered full-time employment.

### Serving Students Through Industrial Sector Partnerships

#### *GM, Tesla, Honda, and More: Powering the Automotive Industry – Shoreline Community College*

Shoreline Community College, located in Seattle, Washington, has partnered with numerous automobile manufacturers to create labor pipelines for student employment in high-demand occupations at auto dealerships. The college offers numerous Associate of Applied Arts and Sciences degrees as well as certificate programs that prepare students to work in the service centers of local dealerships. The program features high-tech service bays and training vehicles as well as award-winning instructors. Students benefit from classroom learning that combines with paid, in-dealership training sessions. Participants also enjoy the ability to earn a variety of manufacturer-specific, stackable training certificates in addition to their AAAS degree. Scholarships and program-specific funding is available through Shoreline Community College Foundation.

The list of companies is impressive; the college curriculum has been recognized for excellence by Chrysler, General Motors, Honda, Nissan, Subaru, Toyota, and Tesla.

The college's Tesla Student Automotive Technician Program, or Tesla START, is an intensive twelve-week program where students develop technical expertise and earn certifications through

“a blended approach of in-class theory, hands-on labs, and self-paced learning.” Upon graduation from the program, completers are ready to start their career at a Tesla service center. Shoreline is one of only six colleges across the country to have a Tesla START program on their campus.

Shoreline reports that job placement is nearly 100% for AAAS graduates looking for work after graduation in their field.

### Majoring in the Cloud: Amazon and NOVA Prepare for the Future

#### *Collaboration Leads to a Cloud Computing Program – Northern Virginia Community College*

On June 20, 2018, Northern Virginia Community College and the Amazon Web Services Educate program announced a new and innovative degree program that was tailor-made to meet the needs of the D.C.-region: a Cloud Computing specialization as part of the institution’s Information Systems Technology (IST) Associate of Applied Science degree. The program was one of the first of its kind in the nation to be offered at a community college. The two-year program builds upon core competencies found in the IST degree and adds the additional level of skills in the cloud environment focused on Infrastructure-as-a-Service and Platform-as-a-Service mechanisms.

The two-year program was matched to skills and competency-based credentials required by Amazon and other employers. All students accepted into the program also received a free membership in the AWS Educate program to gain hands-on experience with cloud technology and tools.

NOVA proved a perfect partner for the program due to the high concentration of technology employers in the region and the demand for employees with cutting edge computing skills. NOVA also pledged to share its Cloud Computing curriculum with educational institutions across the globe, hoping to promote the global needs of educators and students alike.

### Automotive Manufacturing Technical Education Collaborative (AMTEC)

AMTEC is a consortium partnership that was founded in 2005 and continues to be successful today. It is comprised of over 50 college partners and 30 corporate manufacturing companies designed to strengthen competency and competitiveness of the automotive manufacturing workforce. AMTEC was developed to create and sustain innovative, responsive, standards-based workforce development system that maintains and meets the growing skill requirements of the auto industry. Together, they identified an estimated 170 tasks in over twenty different areas for maintenance technician occupations.

AMTEC brings together subject-matter experts with college faculty to identify needed competencies and as well as tasks and skills required for specific jobs. The industry partners came up with a set of over 100 core skills and knowledge competencies that were common to all the plants, factories, and companies. The development of a rigorous, relevant, and standards-based instruction coupled with a hands-on work-study program is vital to understanding when students are capable of demonstrating their ability to translate learning to the career-relevant work. The identified tasks, competencies, and skills have since been translated into an industry-led curriculum accompanied by credentials organized and managed through AMTEC. Some of the industry partners include Toyota, GM, Ford, BMW, Nissan, Honda, Volkswagen, and Chrysler.

The success of the AMTEC educational model is a result of a partnership that is driven by employer needs rather than academic expectations. This enables the curriculum to become more targeted and individualized resulting in greater efficiency. When new partners join the consortium, they are paired with education providers to ensure that the curriculum, skills, and competencies are maintained and innovating to the needs of their businesses.

AMTEC is a prime example of how valuable it is for intensive collaboration and partnerships between employers and college partners in order to maximize the overall success of an apprenticeship, work-study type program. AMTEC's systematic, methodical, and detailed process focuses on the actual work done for a specific job and can be quickly and efficiently tuned among employers, students, and colleges.

AAR Corp (Allen Aircraft Radio)



AAR is a prime example of a mid-size company that worked thoroughly to create their own talent pipeline while reducing education barriers, boosting recruitment and training practices, and increasing employee retention methods. In 2010, they were experiencing 35% growth and were looking to expand its aircraft manufacturing operations; however, in Spring 2011, AAR faced immediate hiring challenges and were looking to fill over 600 positions. This situation sent AAR on a mission to begin building academic partnerships to better prepare themselves to fill these job vacancies.

The majority of positions that AAR require are labor intensive, mid-skills positions that require some type of industry credential or specialization, but not necessarily a four-year degree. When their shortage hit, they immediately began working closely with community colleges, technical schools, and universities to develop curriculum and training programs that conformed to their specific needs. Similar to AMTEC, AAR wanted to create a curriculum that was industry driven by its own business leaders, rather than by academic faculty. In addition, they wanted to shorten the time it takes to get students in the workforce and boost careers in aviation manufacturing to people at a younger age. Not only did AAR want to do this for their own company, but for the entire industry.

AAR operates in four cities – Indianapolis, Oklahoma City, Hot Springs, Arkansas, and Goldsboro, North Carolina. Because of these geographic differences, they have had to work with different institutions to tailor to their needs. In Indianapolis, they partnered with Vincennes University to develop an apprenticeship training program creating two new jobs to assist in getting students into the workforce faster. In Oklahoma City, they partnered with the Francis Tuttle Technology Center to create another apprenticeship program focused on boosting the number of sheet metal technicians. AAR is also working with the Spartan College of Aeronautics in Tulsa to better align curriculum to tailor to jobs at AAR. In addition, AAR is also partnering with Western Heights High School on an internship program to expose high school students to careers in aerospace.

In Hot Springs, Arkansas, AAR is in partnership with National Park Community College on curriculum development. Prior to the partnership, the college did not offer any courses on

aerospace. Now, a former AAR employee is now part of the community college staff teaching an Introduction to Aerospace course. In Goldsboro, North Carolina, AAR partnered with Wayne Community College to create a fast-track welding certification program to get students into their Mobility Systems manufacturing factory faster. Like the academic and apprenticeship programs in the other cities, students have the opportunity to build solid skills and experience while earning a paycheck while they learn. AAR leaders also collaborated with Wayne Community College to create an introductory manufacturing course. Finally, the company partnered with other industry leaders, nonprofits, and educators to spearhead the creation of a new nationally recognized credential that assesses the work readiness level of students and workers.

AAR is an ideal example of a company reaching out to higher education institutions in an effort to shape the workers they need and desire for the future of their business. By doing this, they have created a consistent workforce that will continue to meet the growing demands of their business and the aerospace manufacturing industry overall. They continue to do this today while expanding their blueprint to other cities and institutions as well.

#### Mopar Career Automotive Program (CAP)

The automotive industry is one that is consistently innovating, especially with the ever-expanding use of technology. In the 1980's, Chrysler recognized the growing innovation and the increased workforce demand. Furthermore, they began to see the need for more targeted skills training and realized that the current environment would not suffice. As a result, in 1984, they partnered with five different institutions across the nation to create what is now called the Mopar College Automotive Program, or Mopar CAP.

Mopar CAP worked with the institutions to develop curriculum and expedited programs that would put automotive technicians into the workforce faster. Not only did this create a pipeline of qualified workers for Chrysler, but for the automotive industry overall. The sustainability of this program has been astounding having maintained operation for more than thirty years, and yet they continue to expand.

Recently, in 2017, Chrysler experienced a shortage of automotive technicians. To meet the growing demand of these technicians, Fiat Chrysler Automobiles (FCA) created a partnership with the National Coalition of Certification Centers to establish an advanced training center at Waubensee Community College in Illinois. The program provides advanced training for students to become Level 1 Automotive Technicians. The program is a two-year program that incorporates both hands-on training and classroom instruction. Students are taught the various technologies associated with the automobiles of FCA and have the opportunity to interact with trained faculty and also work in an innovative, state-of-the-art automotive lab. Once students complete this program, they are given the opportunity to continue additional training or employ at an FCA dealership.

MOPAR is another good example of a lasting partnership between industry and academic institutions. Like AMTEC, industry leaders and stakeholders collaborate annually to ensure that curriculum is up to the latest standards and the changing technology. Consistent collaboration means that companies become aware of what the next big opportunity is in their workforce and what skills their workers will need for the future. Not only does them give a head start to meet incoming production demands, but also enables them to remain ahead of industry competition.

### Hypertherm

Hypertherm is a very particular and specialized company based out of New Hampshire. The company designs and manufactures advanced plasma and fiber laser cutting systems. Hypertherm is very good at what they do and are consistently named one of the best employers in the state of New Hampshire. In the early 2000's, business began to boom, and production demand began to increase dramatically, but because of their unique market, it quickly became quite difficult finding, training, and hiring Computer Numerical Control (CNC) machinists. The resulting problem pushed Hypertherm's Vice President of Manufacturing Jim Miller to state, "how well we met this challenge will be determined by how well we can hire and educate a trained workforce."

One of the main things that Hypertherm produces is consumables. These consumables are used to channel plasma, which is several times hotter than the sun. In order to be able to do this process, the consumables must be precisely machined to tolerance levels that are eight times narrower than a human hair. As one can imagine, it is difficult to find employees that are trained to conduct this precise work and in 2006, this challenge became apparent. During this time, Hypertherm estimated it would need nearly 200 new machinists over the next couple of years to sustain their current production while meeting increased demand.

Similar to AAR, Hypertherm made the decision to create its own institution to begin training their own pipeline of employees dedicated directly to the work that they needed. After much research and fundraising, as well as a new partnership with non-profit Vermont HITEC, Hypertherm opened the Hypertherm Technical Training Institute (HTTI). Hypertherm created an expedited program that took good students and put them through their own program. This new school put students through a nine-week program, paid full wages, and a guaranteed job at Hypertherm once they completed the program. This innovative program allows students to go through this expedited program earning a wage and a certificate. This beneficial idea not only helped students, but also addressed Hypertherm's employee shortage and created a consistent pipeline of workers for the foreseeable future.

The program continued and in 2009 partnered with the New Hampshire Community College System. Partnering with the community college system advanced the program and the profession overall. This new partnership enabled students at the HTTI to earn college credit toward an associate degree while also earning a certificate in Machine Tool Technology. The HTTI program provided 28 credits which would mean that students would be more than halfway to an associate degree. If the student chose to continue advancing their education, Hypertherm would cover the cost as part of their sponsored degree program.

This program has become so successful that other employers have opened similar training institutes mirroring Hypertherm's. Not only has Hypertherm boosted the number of CNC machinists, but they have also boosted the image of their industry. Hypertherm is another example of how a mid-sized company foresaw an employee shortage and created their own

solution. They realized they were going to be short on production and if they did not do something to solve it, they would lose profit. Because of their specialized business, they knew they would have to go above and beyond just reaching out. They created their own program, trained employees, and generated a consistent vehicle for skilled and qualified workers for their industry.

## Appendix B: Sample Legal Agreements

*Note:* The agreements in this Appendix are to be used for informational purposes only and not for the purpose of providing legal advice. The Department does not condone, permit, or endorse the use of the language provided, in whole or in part, for any purpose, including legal arrangements, binding or non-binding contractual agreements, or statutory and/or regulatory compliance. When considering entering into an arrangement with a third-party, industry or business partner, or other related party, the institution should contact an attorney or consult their institution's general counsel's office with respect to any particular issue, problem, or proposed legal agreement. Use of and access to this Toolkit or any links contained within it do not create an attorney-client relationship between the U.S. Department of Education and any user or reader.

Example #1 is an off-campus FWS program agreement that provides a good template of the terms and provisions included in such school-employer agreements. Please note that your agreement may have different terms according to your unique circumstances. Example #2 is an authorization for FWS employment form that is jointly filled-out by the FWS student and the employer.

**EXAMPLE #1: FWS Off-Campus Agreement**

[INSTITUTION'S NAME]

FEDERAL WORK-STUDY PROGRAM

OFF-CAMPUS AGREEMENT

This agreement, effective this [DATE] is entered into between the [INSTITUTION'S BOARD] on behalf of [INSTITUTION'S NAME], hereinafter called the Institution, and [PRIVATE EMPLOYER], hereinafter called the Employer, a private for-profit organization, for the purpose of providing work to students eligible to participate in the Federal Work-Study Program, hereinafter called the Program, under the Higher Education Act of 1965 and any amendments thereto.

By entering into this agreement, the Employer will receive the benefit of the service of the student or students employed and the Institution will benefit through its ability to enroll needy students as a result of the funds, which such students will earn through this program.

**ARTICLE I****1.1 Work Assignments**

a) Students will be made available to the Employer in a manner prescribed by the Institution for performance of specified work assignments. Students may be removed from work on a particular assignment or from the Employer by the Institution, either on its own initiative or at the request of the Employer.

b) The Employer shall be considered the employer and shall have the right to control and direct the service of the student with regard to the work to be accomplished and the means by which it is to be accomplished. The Institution shall determine that the student meets the eligibility requirements for employment under the Program.

**1.2 Conditions of Employment**

a) It is agreed that the Employer shall:

(1) Provide orientation to the student with regard to hours of duty, place of duties, working conditions, and briefing on safety, standards of conduct and a familiarization with Employer procedures. Such orientation shall be designed to aid the student in adjusting to the job situation;

(2) Provide the student with an explanation of his/her duties; performance requirements in terms of quality, methods and priorities, and the necessary basic corrective and progressive training;

(3) Provide on-site supervision of the employment activities of the student;

(4) Establish and maintain such records, including time and attendance records, and submit such reports as may from time to time be required by the Institution;

(5) Permit representatives of the Institution to perform on-site visitations from time to time in order to become familiar with the off-campus project and ensure that proper procedures are being followed;

(6) Limit earnings to the amount approved by the Institution and limit hours to no more than thirty (30) in any week. Students may work forty (40) hours per week during periods when classes are not in session; i.e., holidays and semester breaks. The Employer shall assume full responsibility for payment of compensation to students for hours worked in excess of such maximum limitation;

(7) Ensure a safe work environment for the student employee and shall take all reasonable precautions to protect the health and safety of the student employee;

(8) Not provide transportation for students to and from their work assignments;

b) The work performed by students participating in the Program:

(1) shall be work for which the Employer's funds are available;

(2) shall not result in the displacement of the Employer's employed workers or impair its existing contracts for service;

(3) shall be governed by such conditions of employment as will be appropriate and reasonable in light of such factors as type of work performed, geographical location, and educational level proficiency of the student and any applicable federal, state, or local legislation;

(4) shall not involve any partisan or non-partisan political activity associated with a candidate, or contending faction or group, in an election for public or party office;

(5) shall not involve the construction, operation, or maintenance of so much of any facility as is used or is to be used for sectarian instruction or as a place of religious worship;

(6) shall, where possible, be related to each individual student's educational objectives and background.

### 1.3 Student Compensation and Payroll

a) Compensation for work, performed under this agreement shall be paid to students by the Employer. Federal Work-Study employees must receive at least the federal minimum wage rate. Compensation for undergraduate FWS employees must be computed on an hourly wage. However, graduate students may be paid on either an hourly wage or on a salary basis. Wage differentials based on race, creed, color, national origin, or sex is not permissible. It is not acceptable to base the rate of pay on the student's need or on any other factor not related to the student's skills. Generally, students performing comparable jobs should be paid comparable wages. The Employer should consider the following factors when determining the appropriate wage rate:

(1) Skills needed to perform the job;

(2) How much workers with those skills are paid in the local area for doing the same type of job;

(3) Rates the Employer would normally pay similar non-FWS employees; and



(4) Any applicable federal, state or local laws that require a specific wage rate.

(5) Institution shall pay the Employer fifty-percent (50%) of the compensation paid to the student, exclusive of employee related expenses. The Employer shall submit a [FWS TIMESHEET] only for the students certified as eligible by the Institution's [NAME OF THE INSTITUTION'S FINANCIAL AID OFFICE] prior to employment and only for hours not in excess of the number approved by the Institution. Reimbursement will be made for wages paid after receipt of the Employer's invoice and copies of [FWS TIMESHEET]. Employers are to complete their invoices no later than ten (10) days following the end of the month during which the payroll period(s) were completed. The Institution shall reimburse the Employer for its share of the student's compensation within approximately thirty (30) days of the Institution's receipt of the invoice. Invoices should be sent to the following address:

[NAME OF THE INSTITUTION'S FINANCIAL AID OFFICE]

ATTN: Federal Work Study Program

[ADDRESS LINE 1]

[ADDRESS LINE 2]

#### 1.4 Employee Related Expenses

All payments due as an employer's contribution under state or local worker's compensation laws, under federal or state social security laws, or under other applicable laws, will be the responsibility of the Employer.

## ARTICLE II

### Terms of Agreement

3.1 This agreement may be amended only by addendum hereto executed by authorized officials of both the Institution and the Employer.

3.2 This agreement shall supersede any and all prior agreements between the Institution and the Employer regarding the operation of a FWS program under the provisions of the Program and shall be subject to the availability of funds to the Institution for the portion of the student's compensation, which is the obligation of the Institution.

3.3 All terms used herein shall be interpreted in accordance with any definitions thereof contained in the federal statutes and regulations (Title 34, Code of Federal Regulations, Part 675), and are to be interpreted in accordance with [STATE] law.

3.4 This agreement may be terminated at any time by mutual agreement or upon thirty (30) days written notice by either party to the other. If not terminated, it will automatically renew itself as of July 1 each year for the ensuing fiscal year beginning on that date.

3.5 [FOR PUBLIC INSTITUTIONS: The parties recognize that the performance by the [INSTITUTION'S BOARD] for and on behalf of the Institution may be dependent upon the appropriation of funds by the State Legislature of [State] or the availability of funding from other sources. Should the Legislature fail to

appropriate the necessary funds or if the Institution’s appropriation is reduced during the fiscal year, or funding becomes otherwise not legally available, the [INSTITUTION’S BOARD] may reduce the scope of this agreement if appropriate or cancel the agreement without further duty or obligation. The Board agrees to notify the other party or parties as soon as reasonably possible after the unavailability of said funds comes to the Board’s attention.]

3.6 The parties agree that should a dispute arise between them concerning this Agreement and no party seeks affirmative relief other than money damages in the amount of Fifty Thousand Dollars (\$50,000) or less, exclusive of interest, costs and attorneys' fees, the parties shall submit the matter to arbitration, pursuant to [STATE ARBITRATION STATUTE] whose rules shall govern the interpretation, enforcement, and proceedings pursuant to this section. Except as otherwise provided, the decision of the arbitrator(s) shall be final and binding upon the parties.

[INSTITUTION’S BOARD]

By: \_\_\_\_\_

Signature of Contracting Officer

\_\_\_\_\_

Printed Name

\_\_\_\_\_

Date

[NAME OF INSTITUTION’S FINANCIAL AID OFFICE]

By: \_\_\_\_\_

Director of Financial Aid

\_\_\_\_\_

Printed Name and Title

\_\_\_\_\_

Date

[EMPLOYER]

By: \_\_\_\_\_

Authorized Signer

\_\_\_\_\_

Printed Name and Title

\_\_\_\_\_

Date

**EXAMPLE #2: FWS Authorization Form****Authorization for Federal Work-Study Employment  
[Applicable Academic Semester/Year]**

You have accepted a Federal Work-Study (FWS) award for the [applicable academic semester/year]. As a FWS program participant, you are eligible to earn your FWS award through employment from [applicable date range]. Your actual earnings will depend upon your hourly wage and the number of hours you work.

**To Begin Your FWS Employment:**

1. New FWS participants must attend a FWS Student Orientation Session. Please see the orientation schedule at [institutional web address].
2. Search the available FWS jobs on the web at [institutional web address].
3. Contact the employers to schedule interviews for position that interest you.
4. Once you have found a placement, **you and your employer must complete this form and return the SECOND PAGE ONLY to the FWS Program Office.** You will complete the top portion and submit the form to your employer to complete the bottom portion. You and your employer should keep a copy of this form for your records.
5. You will receive a bi-weekly paycheck from your employer after you begin working.

**Terms and Conditions of Your Award**

1. Your gross earnings before deductions (i.e. taxes, FICA, etc.) may not exceed your FWS award.
2. **You and your employer must monitor your gross earnings. We will notify you as your gross earnings approach your award limit.**
3. Federal regulations allow you to hold only **ONE** work-study job at a time.
4. You may never work during scheduled class times.
5. You must notify the FWS Program Office before you change positions or employers. A new work authorization form is required each time you begin a new job.
6. You must comply with all policies in the [institution's] FWS Handbook. The Handbook is available from FWS employers and at [institutional web address].
7. [Institution name] reserves the right to adjust your award if:
  - You fall below good academic standing
  - You received additional aid or your financial need changes

**Student Checklist:**

- I will maintain a minimum of half-time enrollment of at least 6 credit hours
- I will submit a copy of the following documents to my employer:
  - Completed Work Authorization Form
  - My Financial Aid Award Page to verify my FWS award and amount
  - Class schedule for each semester
  - Work schedule for each semester
- I will submit a copy of the **SECOND** page of this Work Authorization Form to the Office of Student Financial Aid **before** beginning work.

**Final Employer Checklist:**

- We will complete and forward a copy of the **second page** of this completed form to the Office of Student Financial Aid
- We will complete and forward all payroll forms to the Payroll Office
- We will ensure all documentation listed under the Student checklist is in the student personnel file:
  - Work Authorization Form
  - Student's Financial Aid Award page
  - Student's class schedule
  - Student's work schedule

**Authorization for Federal Work-Study Employment**

**[Applicable Academic Semester/Year]**

Directions: Student complete the top portion, print it, sign it, and submit it to the employer.  
Employers complete the bottom portion, sign it, and submit *this page only* to the FWS Office.

NAME: \_\_\_\_\_ Institutional ID#: \_\_\_\_\_

Email: \_\_\_\_\_ Phone: \_\_\_ - \_\_\_ - \_\_\_

**To Be Completed by the Student:**

Address: \_\_\_\_\_

I understand and agree to adhere to all program policies and regulations as stated on this form and in the FWS Handbook. I understand that failure to adhere to these regulations may result in termination of my FWS Award.

Student Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**To Be Completed by the Hiring Employer before returning to the FWS Program Office:**

Please verify the following Employer Agreement Policies and Regulations:

1. We are an authorized FWS employer and we have received an institutional allocation for this award period.
2. We have obtained a copy of the student’s course schedule, and have verified that the student is enrolled for at least 6 credit hours.
3. We will not allow the student to work during scheduled class times.
4. We will not allow any student to begin earning FWS funds until we have submitted a completed Work Authorization to the FWS Program Office and Payroll form to the Payroll Department.
5. We will monitor the students’ FWS awards and will not allow their gross earnings to exceed their award.
6. We will notify the FWS Program Office if we change a student’s position or hourly wage. When this position is filled, we will deactivate this position from the FWS website.
  - We have hired this student for the position of \_\_\_\_\_.
  - The hourly rate is \$\_\_\_\_\_.
  - The employment start date is \_\_\_\_\_.

We understand and agree to adhere to all FWS Policies and Regulations as stated on this form, in the FWS Participation Agreement, and in the institutional FWS handbook.

\_\_\_\_\_  
Department/Employer

\_\_\_\_\_  
Supervisor’s Name

\_\_\_\_\_  
Address

\_\_\_\_\_  
Supervisor’s Signature

\_\_\_\_\_  
Phone Number & Email

\_\_\_\_\_  
FWS Account Number