

Building a Community Work-Study Partnership with Financial Aid: *Background and Strategies for Campus Professionals Outside of the Financial Aid Office*

Erin Bowley
Version 1.1 February 2005

Comments on this document are welcomed – please contact the author at (612) 729-4155 or erin@erinb.org.

Table of Contents

Purpose	2
Approach	2
Who Controls or Manages FWS At Your Institution?	3
What is Work-Study?	4
Federal Regulations	4
The “Spirit” of the Regulations vs. Common Interpretations and Applications	5
How is the 7% Mandate Enforced?	6
Forming a Partnership with Financial Aid	6
What Are You Asking For From Financial Aid?	6
Why Should Financial Aid Collaborate With You?	7
What If You’re Still Not Successful In Forming A Partnership With Financial Aid?	9
Other Typical Questions and Areas of Concern	10
How Does the Money Work?	10
What Does the Federal Government Decide and What Does My Institution Decide?	12
Paying Students For Training and Transportation	13
FWS and Academic Credit	13
Work For Religious or Political Organizations	13
Required Written Agreement or Contract	14
7% Is the Requirement – 16% Is the Average	14
Serving Students With Disabilities	14
Web Resources	15

Purpose

The guidance offered here is directed primarily at those campus professionals who serve as coordinators of community service, service-learning, volunteerism, or other similar campus-community partnership efforts.

As you may know, 7% of the federal funds that your institution receives for the Federal Work-Study (FWS) program must be used for "community service" positions. Your institution is required by the federal government to develop and market community service positions to the students who are eligible for Federal Work-Study.

Forming a partnership with the financial aid professionals who control and manage FWS funds in order for you to have more access to or control of the FWS positions for community service can benefit your efforts in many ways. Benefits include increasing the "staff" capacity of your programs, offering meaningful leadership positions to students with an interest in community work, and increasing the number of students serving the community.

This document will give you a basic orientation to the federal regulations governing the use of FWS for community service positions and provide strategies for how to form or strengthen a partnership with your Financial Aid personnel. For *Principles of Best Practice In Community Service Work-Study* and other helpful information, visit www.compact.org/national/FWS.

Approach

This document makes some assumptions about the best way to approach forming a relationship with Financial Aid in order for you to have more of a role in the decisions regarding FWS positions in the community:

1. Build a personal relationship or partnership

It is in your best interest to think about your involvement in FWS as a *partnership* between you or your office and the people at your institution who currently manage FWS. In a partnership, combining the assets of both sides allows for a better outcome than working in isolation. You should not approach this as an opportunity to "take over" the way your institution manages FWS in the community. Instead, you are offering your expertise, abilities, and networks for the benefit of strengthening the program for all involved. You should see this as an opportunity to listen to and learn from the expertise of the professionals at your institution who manage FWS.

2. Educate yourself as much as possible about FWS facts

There are many unfamiliar terms and processes associated with FWS. Many of them are defined in this document or in helpful websites listed in this document. It is in your best interest to learn the basic facts about FWS in the community before launching into a conversation with others at your institution who know much more about the program. The way FWS is managed differs from one institution to the next, because the federal regulations governing the program provide for flexibility. It is important to understand what is *required* by the federal government versus what your institution has decided to do with the program. This is especially true if you are hoping to change the way that the FWS program currently operates.

3. Be flexible: understand that different people use different language or "do things differently"

This document strives to use the terminology most common in the fields of FWS and campus-community initiatives. You may use different terminology (e.g., community *based* FWS instead of community *service*) which is entirely your choice. Language choices in this document are not meant to imply any particular terminology is better. If you have strong feelings about the right way to talk about campus involvement in the community, you should understand that others at your institution may have different views on the same issue. You can also use language to your advantage;

simply because the federal regulations refer repeatedly to *work-study* or *community service*, perhaps different language will work better for your institution (e.g. Community Scholars or Off-Campus Student Employment).

4. Changing FWS practice at your institution will take time

Human beings can be amazingly creative, flexible, and intelligent, but also can be comfortable with "how things are" and averse to change. Given limited time, the professionals who manage FWS at your institution may have established routines and systems that work for them and that they do not want to alter. They probably do not *need* to involve you in their work, so it may take time for you to build a trusting relationship that will ultimately result in your increased involvement in the FWS program. You will be more satisfied and experience more success if you take a long-term approach to building a partnership that increases your involvement in FWS slowly and over time.

Educating Yourself – Common Terms and Concepts

Before rushing in to change anything about the way your institution manages FWS, take the time to educate yourself about both the federal regulations governing the program and determine a few things about how FWS operates at your institution.

Who Controls or Manages FWS at Your Institution?

Institutions of higher education can be structured very differently, with various campus departments having one name at one institution and a totally different name at a different institution. Your institution has made some management or structural decisions about where to locate the professionals who oversee the FWS program. In almost all cases, the office that manages FWS is called either Financial Aid or Student Employment. In many instances, the Student Employment area is located *within* the larger umbrella of Financial Aid.

Financial Aid

Financial Aid (sometimes called Student Aid or Financial Affairs) helps students afford to attend school, and nearly all Financial Aid professionals think of their primary objective as providing access to education. Financial Aid professionals counsel students on the various options students have for how they will pay for their tuition and related expenses. Students (and/or their family if the student is a dependant) complete a federal form called the Federal Student Financial Aid Application (FAFSA) to help the institution determine if the student is eligible -- based on their income and assets -- to receive any help in paying for their education. Based on the FAFSA, the Financial Aid office puts together the student's financial aid package. Elements of the financial aid package generally include *loans* (that student will start paying back to the government, institution, or private lender when they are no longer a student); *grants* or *scholarships* (funds from the government or institution that the student does not have to pay back); and *work-study awards* (a contract with the institution that allows the student to be employed in certain positions to earn money while in school). Professionals in Financial Aid offices are generally well trained in interpreting financial options for students, counseling students about paying for their education, and completing the significant paperwork that accompanies those processes.

Student Employment

Student Employment (sometimes called Campus Employment) refers to campus professionals or the office that helps link students with employers, during school and after graduation. Student Employment specifically manages work programs such as work-study. At a small institution, Student Employment may be one or two people who work within the Financial Aid office. At other institutions, Student Employment may be a stand-alone office that may also coordinate opportunities such as internships and co-operative education. Sometimes Student Employment is located in the institution's Human Resources department.

A review of your institution's website, phone directory, or catalogue will probably clarify who manages FWS. You could also call your Financial Aid office to ask if you are unclear. By asking, "Who manages Federal Work-Study at our institution?" you will determine with whom you need to meet to learn more about your institution's systems and processes for managing the *community service* element of FWS.

In this document, references to "Financial Aid" are meant to include whomever at your institution manages FWS. Therefore, you might need to replace "Financial Aid" with some other term (e.g., Student Employment) in the remainder of this document once you determine who manages FWS in your context.

What Is Work-Study?

This document will focus on *Federal Work-Study*, but be aware that many institutions also participate in state work-study programs (State Work-Study) or offer work-study jobs paid entirely by the institution (Institutional Work-Study). State and Institutional Work-Study programs generally do not have the same regulations for community service, so ask how those programs work at your institution, if they exist.

Federal Work-Study Background

The Federal Work-Study (FWS) program was created by the federal government in 1964 as a part-time employment program for low-income students. Its most important purpose was and is to provide access to higher education by providing a work opportunity to students who, based on their income, need to work while attending college or university. FWS is generally just one part of a student's overall financial aid package. The vast majority of FWS students at colleges and universities today work on campus in various positions such as assistants in academic departments, the cafeteria, the library, etc. The federal agency that oversees and regulates FWS is the U.S. Department of Education (DOE).

Community Service and Federal Work-Study

Revised language in the Higher Education Act in 1965 clarified that work performed by FWS students was to be "for the institution itself or work in the public interest for a public or private nonprofit organization." So from the early days of the program, community service has been part of its purpose. In 1994, a new mandate established that 5% of the total FWS funds received by an institution were to be used for community service positions. In 2000, the mandate was increased to 7% and an additional requirement stated the institution must also employ at least one student in a tutoring or family literacy program.

Understanding the "7% Mandate"

The current 7% mandate refers to the percentage of the *total amount of FWS funds* received by the institution that must be used to pay wages to students in community service positions. It does *not* mean that 7% of the number of students must be in community positions. Depending on the total amount of FWS received by your institution, 7% may result in only a few community service positions or it may mean hundreds.

Federal Regulations

The following text are portions of the actual federal regulations governing FWS that relate to its purpose and definitions. To simplify things, this edited version does not include language that does not directly relate to the community service portion of FWS.

Department of Education, Office of Postsecondary Education
Part 675 - Federal Work-Study Programs

§ 675.1 Purpose

(a) The Federal Work-Study (FWS) program provides part-time employment to students attending institutions of higher education who need the earnings to help meet their costs of postsecondary education and encourages students receiving FWS assistance to participate in community service activities.

§ 675.2 Definitions

Community services: Services which are identified by an institution of higher education, through formal or informal consultation with local nonprofit, governmental, and community-based organizations, as designed to improve the quality of life for community residents, particularly low-income individuals, or to solve particular problems related to their needs...

§ 675.18 Use of funds

(g) *Community service.* (1) For the 2000-2001 award year and subsequent award years, an institution must use at least seven percent of the sum of its initial and supplemental FWS allocations for an award year to compensate students employed in community service activities. In meeting this community service requirement, an institution must include at least one --

(i) Reading tutoring project that employs one or more FWS students as reading tutors for children who are preschool age or are in elementary school; or

(ii) Family literacy project that employs one or more FWS students in family literacy activities.

§ 675.8 Program participation agreement

To participate in the FWS, an institution of higher education shall enter into a participation agreement with the Secretary. The agreement provides that, among other things, the institution shall --

...(d) Award FWS employment, to the maximum extent practicable, that will complement and reinforce each recipients' educational program or career goals;

...(f) Inform all eligible students of the opportunity to perform community services and consult with local nonprofit, governmental, and community-based organizations to identify those opportunities.

These portions of the regulations clearly show that community service positions are important to the program. Additional portions of the regulations found in Part 675 that relate to community service FWS are found later in this document.

The "Spirit" of the Regulations vs. Common Interpretations and Applications

One of the greatest challenges in working effectively with others at your institution on FWS is the different ways people interpret portions of the regulations related to community service. A good way to determine if a FWS position meets the community service requirement is to consider who is most affected by the work of the position -- the community at-large or the campus community? The *Federal Student Aid Handbook (2003-04)* clarifies in Chapter 5 that positions may be on or off campus, but that "on-campus jobs can meet the definition of community services, provided that the services are open and accessible to the community... A service is considered open to the community if the service is publicized to the community and members of the community use the service." Despite this guidance, many institutions choose to "count" some on-campus positions that do not substantially serve the community at-large in order to meet or exceed the 7% requirement. They rationalize this because the position may be located somewhere on campus that has *some* community contact, such as the library, gymnasium, or theater box office, if these areas are open to the public. Generally, these sorts of positions do not reflect the *spirit* of the 7% mandate. This problem is fueled by the current climate of minimal federal oversight and enforcement (see below). It

is critical that you have a dialogue with colleagues in the Financial Aid office and other offices on campus to determine and write down the criteria that you will use to define appropriate community service positions.

How Is The 7% Mandate Enforced?

The 7% is a federal *regulation*, not a law. It is established by the Department that oversees the program—in the case of FWS, the U.S. Department of Education (DOE). Even though it is not a law, it is enforceable. Institutions that do not follow the regulation run the risk of being penalized by the DOE, such as losing a portion of FWS in the following year. However, there are few examples of this kind of enforcement. Financial aid professionals or other campus administrators “choose” to some extent whether or not to follow the regulation closely. Outside of the DOE, an institution's own external auditors should examine if the institution's FWS program is in compliance, including whether the community service positions appear to comply with the federal regulations and definitions.

Forming A Partnership With Financial Aid

What Are You Asking For From Financial Aid?

At this point, you may be excited about the possibilities of getting more connected to the FWS program. Before meeting with your Financial Aid personnel, it is important to clarify what you are really hoping for and asking for. Even if your first meeting is meant only to better educate yourself about the FWS program at your own institution (a good way to approach your first meeting), you should think through your vision for your increased involvement in the program. Knowing what you want will help you ask better questions. Being clear about your self-interest is not bad; you will more likely to create a partnership that serves your needs and interests long-term. Some possible outcomes of your increased involvement in community FWS are:

A few students to build the capacity of your own program

FWS students might help add increased capacity for your community-based or service-learning efforts. For example, you may wish to employ a small number of students in your office to support your work. These students may serve as “student coordinators” or “issue area coordinators” or “partner liaisons,” etc. If the students have a role interfacing with your community-based organization partners (such as when you choose one FWS student to be the primary liaison with one or more key partner organizations), then they can qualify as community service FWS. If the students in your office or program are strictly doing administrative work in the office with no community interaction, they probably don't qualify.

A large number of students for direct service, program coordination, etc.

You may wish to have a large number of FWS students (perhaps all that fulfill your institution's 7% or greater) allocated to your office so that you can, in turn, involve them in direct service positions with community organizations and/or leadership roles.

A role in identifying and communicating with community partners

You are likely to have some idea of which community organizations work well with your students through past volunteer or service-learning interaction. You may have a system that identifies some “key” community partner organizations of your institution. Without managing the entire community FWS program, you could help inform the Financial Aid office regarding which organizations you recommend or with whom you have a pre-existing working relationship.

A role in promoting the program

You may want to increase visibility of the community FWS opportunity for students and/or community organizations. Your office might offer to help market the opportunities through existing or new systems.

A role in supporting students in the community

If you have a well established community service or service-learning effort at your institution, you are aware of the importance of properly preparing students for community-based experiences, and offering them structured ways to discuss and learn from the challenges and opportunities they face during those experiences. You recognize the important role student leaders can play in community programs. You might offer to help the Financial Aid office prepare community FWS students, engage them in structured reflection or education opportunities, and/or develop student leadership through your office.

A role in connecting community FWS with academic study

Federal regulations discussed in this document show a desired link between students' area of study or career plans and their FWS experience. Your office might be able to help form these kinds of connections such as offering FWS positions to students who complete service-learning experiences but want to continue their service, helping develop and market community FWS positions that relate to the typical areas of study of the students at your institution, or creating FWS student assistant positions to support faculty who do service-learning (e.g., communicating with partners, observing students in the community, arranging transportation options, facilitating reflection, etc.)

Full control of the institution's community FWS program

You may be willing to take on nearly all the tasks involved in managing your institution's community FWS program. These include the items listed above, plus preparing and executing required written agreements with each organization where FWS students work, tracking timecards and wage payments, managing invoicing community organizations for their portion of the wage match (if applicable), monitoring through site visits, etc. The Financial Aid Office will, however, always be involved in reporting your institution's use of community FWS to the federal government and approving aspects of the program.

Why Should Financial Aid Collaborate with You?

In addition to thinking through why you want more involvement in the community FWS program, you can help educate Financial Aid colleagues about why working with you will serve their interests as well. *Understanding and helping meet the Financial Aid office's needs is the best way to form a partnership with them.*

What Challenges Do Financial Aid Professionals Face?

It is important to understand that managing the community service aspect of FWS was probably "added on" to a Financial Aid professional's job at your institution and that person or people are probably still responsible for everything they had been responsible for before. Relatively little administrative money accompanies the FWS program, so the "7% mandate" and other program requirements are just increased responsibilities for the people who manage the programs. It is unlikely that Financial Aid personnel think of community FWS as an established "program," but instead it is a requirement that they meet. In addition, professionals in Financial Aid do not usually have any training in working effectively with community organizations, finding community partners, building campus-community partnerships, or working with students who are dealing with (potentially challenging) community experiences. You can bring a wealth of experience in these areas to your partnership with Financial Aid.

What Motivates Financial Aid?

As stated earlier, Financial Aid professionals primarily see their job as promoting access to higher education. Professionals who focus specifically on Student Employment want to provide good work opportunities that help students hone in on a career path and build their skills and experience. Second only to earning money for education, Financial Aid and Student Employment professionals will share the following *primary desired outcome* for your institution's FWS program:

Provide an excellent work experience for students that offers developmentally appropriate tasks, teaches useful skills, is well supervised, and can be used to show work experience on a student's resume.

The **benefits** that high-quality *community* FWS positions may offer over most traditional, on-campus FWS positions include:

- Balancing an interest in service to the community with a need to work
- The “legitimacy” that an off-campus position may provide when listed on a resume
- More responsibility
- Opportunities to take leadership or lead programs
- Links between the community position and academic interests
- Varied opportunities to gain career experience
- Strengthening campus-community partnerships
- Good public relations for the institution

If you think you can help create FWS positions that will accomplish the above benefits, make sure to articulate those to your Financial Aid colleagues.

Additional Ways To Serve Financial Aid's Interests

Relieving some of the work burden

Developing community FWS positions can be much more labor intensive than traditional on-campus positions. Your office may have an existing infrastructure that supports service or service-learning that could take on some program management elements without any or much financial outlay. Offer to help with some of the work such as identifying good community partner organizations (e.g., those that work well with your students), orienting students to community experiences, making site visits to community organizations for monitoring purposes, executing written site agreements, interviewing students to find good matches in the community, marketing the program to students or organizations, evaluating the program, tracking timesheets, etc.

Provide structure to improve quality

As stated above, your institution may not think of community FWS as a “program” with goals, staff, evaluation results, criteria for appropriate community positions, etc. If you can offer the opportunity to create such a program by relying on some of your existing infrastructure and capacity, the experience for all stakeholders will be improved.

Supplemental funding for your institution

Some institutions do not use all the FWS funds they receive and they return these “deobligated” funds to the DOE. Other institutions that do use all of their funds and would like to receive more are eligible to apply for “reallocated” funds *if 5% is already being spent on community tutoring/literacy programs and the institution has a “fair-share shortfall”* (your Financial Office can clarify this). Reallocated funds can only be used as wages for community service jobs. So, if your institution would like to increase the amount of FWS funds it receives, strengthening the community portion of the FWS program is important. With a supplemental increase in the overall amount of FWS funding your institution receives and uses comes a modest increase in the Administrative Cost Allowance funds (for staff and other administrative costs) it receives from the DOE.

Assist with future FWS rule changes

As FWS program requirements change (e.g., increases or changes to the mandate for community service) your institution will be in a better position to react to those changes if you are in partnership with Financial Aid and have a coordinated program.

What If You're Still Not Successful in Forming a Partnership With Financial Aid?

You may take the time to become well versed in the community FWS program, to understand the challenges facing the Financial Aid professionals at your institution and the ways you can help alleviate some of the burdens, and how the program quality will improve through your involvement, and your Financial Aid colleagues may still not be interested in working with you. Below are some common responses you might get, and some thoughts on how to deal with them.

“We’re unwilling to give up control of the program.”

Stress that you are not looking for total control of the community FWS program, but instead are hoping to help make it stronger. Listen and understand which portions of the program the Financial Aid staff feel are vital to keep in their office and suggest ways that you can take off the burden in other ways.

“It doesn’t matter what we do, because there’s no enforcement.”

“We think that ‘community service’ means serving our campus community.”

You may need to remind your colleagues that the regulation is clear: community service positions should serve the community at large and not the campus community. Administrators should generally not side with a campus department that “gets around” a federal regulation by interpreting the language they way they want to. Even if the federal government does not examine the program closely, your institution’s external auditors should be comparing the federal regulations with the position descriptions on file and making sure there is compliance.

“I don’t make the decisions...”

“There’s no extra money to increase the number of community positions...”

“Other departments really need the student workers...”

The people in Financial Aid with whom you talk (or have access to) may not make certain decisions (or claim not to make certain decisions) regarding allocation of budgets and management practices. Those decisions might be made “higher up” in the administration. You might hear that your Financial Aid colleagues have no interest in changing current policies, including the amount of funds allocated for community FWS positions.

1. Once you have tried your best to have productive conversations around these issues but have not made progress, you may need to take your concerns to another audience. Before doing so, make sure you understand the climate in the Financial Aid office correctly and that you know how to articulate the benefits of changing or strengthening the community service portion of FWS. You may need to get access to someone higher up in the chain of command in Financial Aid or at the institution. If you do not personally have the access it requires to be heard at that level, enlist an “ally” of your work who does (e.g., someone with power or connections who believes in your work).
2. Look at the mission statement of your institution, its strategic plan, and recent statements from the president’s office (or other top administrators) for examples of ways the institution might be trying to strengthen its commitment to civic engagement or community service. Talk about how community FWS is one piece of a larger commitment that your institution can make to your local community and to increasing civic engagement among your students.
3. Find examples of strong community FWS efforts at other “peer” institutions. Talk with your Campus Compact office for suggestions or visit www.compact.org/national/FWS and review the “Principles of Best Practice in Community Service Work-Study” for strong program model examples from diverse institutions.

4. Remind your colleagues that while the required mandate is 7%, the national average is 16% of FWS funds are used for community service positions.
5. Be persistent, keep listening to (rather than talking at) the Financial Aid personnel, and talk with a variety of people in the institution about the benefits of a strong(er) community FWS program.

Other Typical Questions and Areas of Concern

Federal Work-Study is full of complicated regulations and program interpretations, especially for those people who don't work with it on a regular basis. Here are some additional pieces of information that will help increase your understanding.

How Does the Money Work?

There are several potentially confusing issues to understand regarding how FWS funds flow to institutions, to students, and from community organizations.

From the DOE To Your Institution

Your institution applies each year to receive FWS funds using the "FISAP" (Fiscal Operations Report and Application to Participate.) Most of the FWS funds the institution receives will go to student wages, while a small amount is provided for administrative costs (this is called the Administrative Cost Allowance). A calculation called "fairshare" determines which institutions in the nation receive more or less of the total amount available for FWS. In general, institutions that have participated in the FWS program for a longer amount of time receive more of the funds. Institutions in the eastern United States also generally receive more than institutions in the west. Your Financial Aid office can tell you more about how the fairshare calculation affects their situation.

From the Institution To the Students

The wages paid to a FWS student in a traditional on-campus position are 75% from the federal government (through the FWS program) and 25% from the institution's own budget. Often, when a student serves in the community, the community site is asked to pay the 25% that would otherwise be paid by the institution. However, the institution may ask the community site to pay more or less than 25%. This is discussed later under "Wages" and "Waivers." Students are given a FWS contract as part of their financial aid package. The contract lists the total maximum amount they can earn through FWS for the year. Students need to pay attention to their contract maximum, the amount they are earning per hour, and the number of hours they are working so that they "use up" their contract at the rate they and their supervisor intend. Some students have the work-study wages applied directly to the cost of their education, while some choose to receive a check similar to a "normal" job. In a small number of cases, the community organization is responsible for putting the student on their payroll and paying the student directly (in these cases, the organization bills the college or university for the federal portion of the wage). More often, the institution pays the students and bills the community organization for any portion of the wages it owes.

Wages

The wage that FWS students earn is determined by your institution. It must be at least the federal minimum wage. The wage should be commensurate with the responsibility of the student as outlined in their position description. At some institutions, all FWS students earn the same wage. At others, the wage varies depending on what the students are doing. Many institutions have established a “wage incentive” for students doing community FWS, such as offering a higher starting wage for community positions or offering a higher possible wage if students stay in their position. Most important for you to understand is that your institution, not the federal government, sets the students' wages. In some cases, community organizations will offer a wage supplement (over and above the amount they are required to contribute) to increase the total wage and attract students to their position(s).

Waivers

There are a number “waivers” that you might hear about in connection to community service FWS.

America Reads: The most common waiver is the “America Reads waiver.” This refers to the regulation that instead of allowing only 75% of federal funds to pay student wages, if the student is a tutor in a community literacy or math program, the institution may pay the student using 100% federal funds.

Minority-serving institutions: Some minority-serving institutions (e.g. Historically Black Colleges and Universities) may use 100% federal funds to pay all FWS students.

Under-resourced organizations: A lesser known waiver allows community organizations that cannot afford to pay 25% of the students' wage to request that they only pay 10%. The other 90% will be paid from federal sources. The federal share may be up to 90% if the student is employed at a nonprofit organization or public agency that “would not otherwise be able to afford the costs of this employment.” The organization must write a letter to the institution requesting this waiver, and the institution will review these requests on a case-by-case basis to make its decisions. No more than 10% of students participating in FWS may work under this sort of waiver.

Institutional waiver: In a very small number of cases, institutions will request a waiver of exemption from the 7% mandate. They do not need to report any community FWS positions at all. This is a difficult waiver to get and few institutions have one.

Complicating Factors

Managing FWS funds can be very complicated, even for experienced Financial Aid administrators. As background information, you should understand some of the reasons why it might be difficult for your Financial Aid office to determine exactly how much funding will be available any given year or semester for community FWS positions:

- Not every student offered FWS in their financial aid package enrolls in the institution;
- Not every student who accepts a FWS offer finds employment;
- Not every student who works uses up all of their award;
- Some students work more than their award allows; and
- Students earn at different rates (of time and money).

What Does the Government Decide and What Does My Institution Decide?

There are some clear areas where the federal government determines regulations for FWS programs, and there are instances where the federal government is flexible and institutions create their own policies. Theoretically, you could work to convince your institution to change their approach to the areas listed on the right side of the table below, however it is worth having a conversation to determine how “set in stone” some of the institutional policies are, why they exist as they do, and where changes are possible.

FWS Program Element	Federal Regulations	Institutional Policy
Wage for students	At least minimum wage	Institution determines possible range of wages.
Match required of community sites	No maximum or minimum Organizations can request to pay only 10% due to financial hardship. Federal funds can be used to pay 100% of literacy/math tutoring wages.	Institution determines if community sites pay 0% - 50% of students' wages.
Eligibility for work-study	Students meet basic income limits on the FAFSA.	Institution determines how many and which students will receive FWS as part of their financial aid package.
How much FWS funding is dedicated to community service positions	At least 7%	Institution determines if it will allocate more than 7%.
Can students work on campus and be counted as meeting the 7% for community service?	<i>Community services</i> are... designed to improve the quality of life for community residents, particularly low-income individuals... (See also “Serving Students With Disabilities” later in this document.)	Institutions may believe that services provided on campus (e.g. staffing the campus library) meet the definition, but this does not generally fit the “spirit” of the regulation.
Can students work for religious organizations?	Students may tutor in a parochial school but may not engage in religious education activities.	Institution may establish its own priorities for where students can serve that may or may not allow for serving with religious organizations.
Can students work for partisan or nonpartisan political organizations?	No. There are a few, very unlikely exceptions to this rule.	
Can students replace regular workers?	No. Students may not displace workers or replace striking workers.	

Paying Students For Training and Transportation

Students in some community FWS positions may require significant training in order to be adequately prepared for their community experience. This is especially true when working with vulnerable populations and/or in literacy programs. Students may be paid wages for the time they spend in training. Students may also be paid wages for the time they spend getting to and from their community site (the federal governmental does not provide any extra funds for mileage reimbursement or public transportation costs, however.)

675.18 Use of funds.

(h) *Payment for time spent in training and travel.* (1) For any award year, an institution may pay students for reasonable amount of time spent for training that is directly related to FWS employment.

(2) Beginning with the 1999-2000 award year, an institution may pay students for a reasonable amount of time spent for travel that is directly related to employment in community service activities (including tutoring in reading and family literacy activities).

FWS and Academic Credit

Students *may* earn work-study wages for the same hours they spend completing an internship, practicum, doing research in some cases, or during an assistantship. Students *may not* earn work-study wages for the time they would normally spend in a classroom or lab as part of a course. If students are engaged in service-learning activities outside of the classroom, it is possible for them to earn FWS wages. You should discuss these options with your institution's Financial Aid professionals.

675.20 Eligible employers and general conditions and limitation on employment.

...(d) *Academic credit and work-study.* (1) A student may be employed under the FWS program and also receive academic credit for the work performed. Those jobs include, but are not limited to, work performed when the student is --

(i) Enrolled in an internship;

(ii) Enrolled in a practicum; or

(iii) Employed in a research, teaching, or other assistantship.

(2) A student employed in an FWS job and receiving academic credit for that job may not be --

(i) Paid less than he or she would be if no academic credit were received;

(ii) Paid for receiving instruction in a classroom, laboratory, or other academic setting;

Work For Religious or Political Organizations

Generally, students can work in programs sponsored by a religious organization as long as the activities serve the community at large, do not involve religious education, and are open to individuals outside the religious organization's own members. Generally, students may not serve partisan or nonpartisan political organizations or

campaigns. Institutions may have differing interpretations of these regulations, so it is best to have a conversation with your Financial Aid professionals to determine if your institution has determined its own criteria.

675.22 Employment provided by a Federal, State, or local public agency, or a private nonprofit organization.

(a) If a student is employed by a Federal, State, or local public agency, or a private nonprofit organization, the work that the student performs must be in the public interest.

(b) *FWS employment in the public interest.* The Secretary considers work in the public interest to be work performed for the national or community welfare rather than work performed to the benefit of particular interest or group. Work is not in the public interest if --

(1) It primarily benefits the members of a limited membership organization such as a credit union, a fraternal or religious order, or a cooperative;

(2) It is for an elected official who is not responsible for the regular administration of Federal, State, or local government;

(3) It is work as a political aide for any elected official;

(4) A student's political support or party affiliation is taken into account in hiring him or her;

(5) It involves any partisan or nonpartisan political activity or is associated with a faction in an election for public or party office; or

(6) It involves lobbying on the Federal, State, or local level.

Required Written Agreement or Contract

You must have a written agreement with the off-campus agency or organization where students serve. The template for your agreement should be approved by your institution's attorney, although you may use a similar agreement with all off-campus organizations. A sample agreement is found in the *Federal Student Aid Handbook* cited below.

7% Is the Requirement – 16% is the Average

While the 7% mandate gets most of the attention, the national average for use of FWS funds for community service is actually 16% (in 2003). It is not clear, however, if all of the wages included in this average were used in positions that meet the spirit of the mandate or what the quality of the programs are. However, when discussing your institution's plan for community FWS, make sure that your colleagues know that 16% is the national average.

Serving Students With Disabilities

A special regulation allows FWS students who serve other students on campus with disabilities to be counted as part of the 7% for community service, even though these students are serving other college students.

Web Resources

Summary of the history of FWS and community service and many other useful resources

www.compact.org/national/FWS

General information

on service-learning, civic engagement, campus-community partnerships, and state Campus Compacts

www.compact.org

Federal Student Aid Handbook (for Financial Aid Professionals) Provided by the Dept. of Education

www.ifap.ed.gov/IFAPWebApp/currentSFAHandbooksPag.jsp

See especially: 2003-04 Volume 6, Chapter 5
2004-05 Volume 6, Chapter 2 and Appendices A & B

Frequently Asked Questions about Federal Work-Study and Community Service

(provided by the Corporation for National and Community Service)

www.nationalservice.org/areads/FWS/fwsfaq.html#SERVICE

National Student Employment Association

"The Work Book" provides detailed information on work-study regulations and programs

(no "www") nseastudemp.org/publications.asp

1997 U.S. Department of Education Guide to Community Service Work-Study

www.ed.gov/offices/OPE/pubs/WorkStudy/

Guidance on the relationship between AmeriCorps benefits and financial aid eligibility

www.americorps.org/members/resource/education/benefits.html

Erin Bowley can be reached at (612) 729-4155 or erin@erinb.org.