

WORK COLLEGES

CONSORTIUM

A Guide to the Work Colleges Program **2022**



WORK COLLEGES
CONSORTIUM

How to Use this Guide

The guide is divided into eight sections for ease of use

section 1

Work Colleges Program at a Glance

- ➔ Work Program Basics / Key Elements for Program Implementation
- ➔ Frequently Asked Questions
 - ⦿ Will the Federal Work Colleges Program Help a School Save Money?
 - ⦿ Are Colleges Eligible to Receive Federal Funding Through the Work Colleges Program?
 - ⦿ Will Federal Work College Funds Help Offset the Cost of Operating a Work Colleges Program?
 - ⦿ Why Aren't There More Work Colleges?
 - ⦿ How Do Work Colleges Differ from More Traditional Institutions?
 - ⦿ What are Some of the Differences Between Federal Work-Study and the Work Colleges Program?
 - ⦿ Colleges Interested in the Work Colleges Program Must Ask the Following Questions to Explore if the Model is Right For Your Institution
 - ⦿ Important Caveat

section 2

Meet the Members of the Work Colleges Consortium

- ➔ Alice Lloyd College, KY
- ➔ Berea College, KY
- ➔ Bethany Global University, MN
- ➔ Blackburn College, IL
- ➔ College of the Ozarks, MO
- ➔ Kuyper College, MI
- ➔ Paul Quinn College, TX
- ➔ Sterling College, VT
- ➔ Warren Wilson College, NC

section 3

Federal Work-Study Programs and Regulations

- ➔ Highlights of the Work Colleges Program Federal Requirements

section 4

Regulation in Practice with School Examples

- ➔ School Program Participation
- ➔ Student Employment Regulations
 - ⦿ Payments to Students
 - ⦿ Records Non-Cash Contributions
- ➔ School Examples of How Students are Paid

section 5

General Work Practices and School Examples

- ➔ Employment Conditions
- ➔ Regulation Regarding Student Work Education
- ➔ School Examples: Assigning of Jobs, Tracking of Hours, Summer Work, etc.
- ➔ Record of Work Performance
- ➔ Student and Program Evaluation
- ➔ Service at Work Colleges

section 6

Program Oversight, Supervisors and Training

- ➔ Work Program Oversight and School Examples
- ➔ Work Program Supervisors and Training
- ➔ Administration of FWS
- ➔ Fair Labor Standards Act (FLSA)
- ➔ Job Location Development
- ➔ I-9 US Department of Homeland Security
- ➔ Family Educational Rights and Privacy Act (FERPA)

section 7

Becoming a Federally Approved Work College

- ➔ Instructions for New Applicants
- ➔ Information About Participation in the Work Colleges Program
- ➔ U.S. Department of Education Application and Agreement to Participate in the Work Colleges Program

section 8

Membership in the Work Colleges Consortium

- ➔ Criteria for Membership
- ➔ Eligibility
- ➔ Application

INTRODUCTION

A GUIDE TO THE WORK COLLEGES PROGRAM: AN EDUCATION THAT WORKS

A College Work Experience Like No Other

Students attend Work Colleges to learn, gain knowledge, explore their interests, pursue their passions, and obtain hands on work experience. As smart consumers, students recognize that attending a Work College will help reduce the cost of a college education. Work Colleges are student centered and provide students with the unique opportunity for experiential learning through work and service. Subsequently, one of the most significant and defining pieces of the Work College experience is work and service to others. While most colleges provide both on-campus and off-campus service opportunities for students, it is the work experience at Work Colleges where students learn about navigating the work-a-day world, gain confidence in themselves as young adults, and understand the value of work and service to others. All resident students and one half of all full-time enrolled students are required to work at Work Colleges. Work at Work Colleges fosters an empathetic sense of service, strong work ethic, and caring for community. A majority of Work College students work at on campus jobs where work brings everyone together by connecting individual work contributions to the greater community in which students learn, work, and live. The experience is profound. Collectively, all types of skills are needed for work college campuses to operate efficiently and safely. From maintaining campus technology services, preparing campus meals, working in accounting, providing tutoring assistance, grounds-keeping, or giving campus tours students quickly become aware of the important contribution their work makes to the entire community. Work Colleges often use the phrase “there is dignity in all work.” How safe would a hospital be if it was unclean and dirty? What would our streets look like if trash did not get collected? Who would keep automobiles operating if there were no mechanics? There is work that requires getting dirty, there is work that requires a lot of physical stamina, there is work that requires endless amounts of patience, there is work which requires great diplomacy, and there is work which requires courage. All jobs have different requirements and all people have different skill sets. Therefore, understanding the context of work provides sincere empathy and insight into the importance of treating all work and workers with dignity and respect. The combination of these skills, values, and insights contribute to the understanding of work as service to the community. The **Work Colleges stand alone in providing a unique and unparalleled student work-service experience that intersects with learning – a core value of the educational program at Work Colleges.**

The Benefits of Attending a Work College

1. **Reduced debt:** In addition to a college degree, students graduate with reduced debt and significant work preparedness. Self-help payments to students directly contribute to the cost of tuition.
2. **Hands on involvement:** From the classroom to the work program, the student educational experience requires hands-on participation. Active participation in the campus community is a core component of the Work College model. Competition for campus jobs with increased responsibility is merit based thereby mirroring the real world.
3. **Constructive advice:** Students receive continuing support and work evaluation, which directly impacts career preparation.
4. **Work College graduates are:**



Problem solvers



Effective time managers



Service oriented



Respectful and value others' opinions



Experienced leaders



Attentive to detail



Adaptable and resilient



Responsible and punctual



Appreciate the value and dignity of all types of work



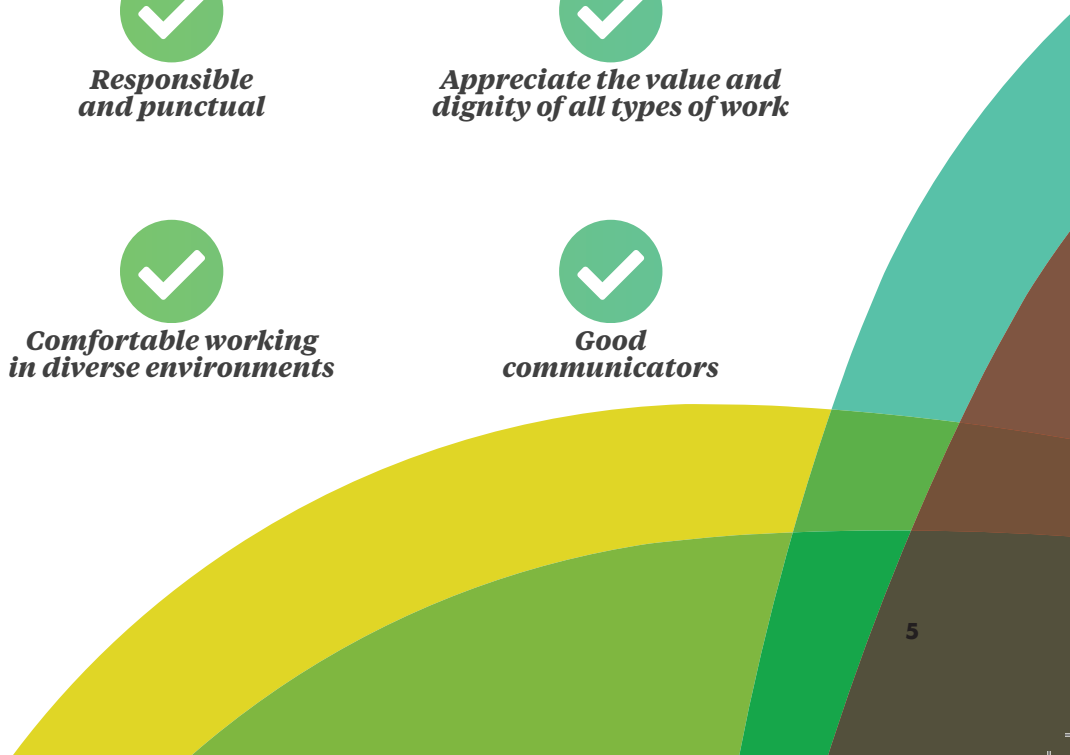
Accepting of constructive criticism



Comfortable working in diverse environments



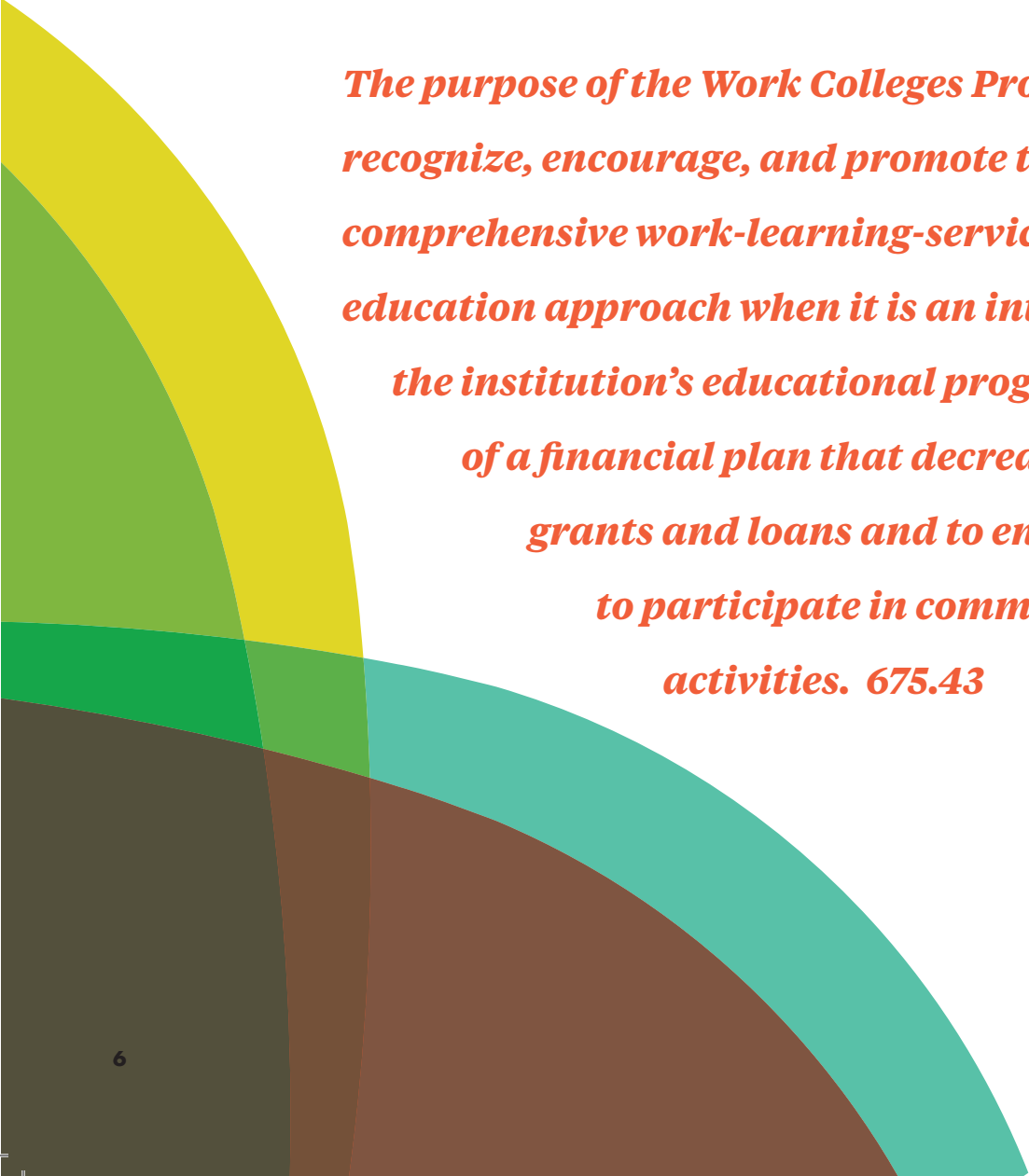
Good communicators



An Operational Guide to the Work Colleges Program

A Work College is an institution approved by the U.S. Department of Education that meets the federal regulatory requirements to operate as a Work College.


Unique to all Work Colleges is the requirement that all resident students participate in a comprehensive work-learning-service program for all years of enrollment. Therefore, all resident students are required to work. While a majority of students across the work colleges have on campus jobs, students also hold off-campus positions. Some Work Colleges have developed off-campus “corporate work programs.” Whether working on-campus or off-campus, students are given responsibility, relied upon, and gain valuable hands-on work experience, while helping to reduce the cost of their education. The work college model is student centered and designed to enrich and complement the educational experience and help students find their passion.



The purpose of the Work Colleges Program is to recognize, encourage, and promote the use of comprehensive work-learning-service as a valuable education approach when it is an integral part of the institution’s educational program and a part of a financial plan that decreases reliance on grants and loans and to encourage students to participate in community service activities. 675.43



The Work Colleges Program at a Glance

- 
- ➔ Work Program Basics / Key Elements for Program Implementation
 - ➔ Frequently Asked Questions
 - ➔ Will the Federal Work Colleges Program Help a School Save Money?
 - ➔ Are Colleges Eligible to Receive Federal Funding Through the Work Colleges Program?
 - ➔ Will Federal Work College Funds Help Offset the Cost of Operating a Work Colleges Program?
 - ➔ Why Aren't There More Work Colleges?
 - ➔ How Do Work Colleges Differ from More Traditional Institutions?
 - ➔ What are Some of the Differences Between Federal Work-Study and the Work Colleges Program?
 - ➔ Colleges Interested in the Work Colleges Program Must Ask the Following Questions to Explore if the Model is Right For Your Institution
 - ➔ Important Caveat

S.1

THE WORK COLLEGES PROGRAM AT A GLANCE

It is not hard to philosophically grasp the Work College model. It's a unique melding of work, learning, and service - where learning is paramount and work enhances and supports the educational program. By working on-campus, students quickly become aware of how their jobs contribute and support the overall campus community. Students acquire work experience, develop both hard and soft transferable skill sets, while helping to reduce the cost of education. Attending a Work College provides students with a matchless opportunity and broad perspective which enables them to further discover and develop their own interests and competencies. Students learn to work in a wide variety of situations, perform a job, and gain a deeper understanding of the workplace environment.

All resident students at Work Colleges are required to work every semester of enrollment. The Work Colleges share the ethos and culture of work-learning-service. However, that is where the similarities end. The work program on each campus is distinctive and designed to meet the specific operational and educational needs of each school. Each Work College is a unique institution and no two are the same. Every student at a Work College is given a job that enhances the educational experience. Work assignments might align with their program of study or open an entirely new world of opportunity. Students are fully relied upon as contributing and essential members of the campus workforce or their outside employers as they acquire new skills and responsibilities. Participation in the Work Colleges Program helps to reduce the cost of education for all students. In addition, some schools provide self-help grants that fully cover the cost of tuition. Students can be dismissed from a work college for non-performance in the work program just as they would for non-performance in the academic program.

Is the Work College Model Right for Your Institution?

1. Is there an existing culture at your institution that embodies work and service?
2. Why implement a student work program? What is the intent of having a student work program and what are the goals?
3. Can your institution afford to operate a student work program?
4. Can your institution provide or build the necessary infrastructure to support a student work program?
5. How will student work impact your faculty, staff, and campus?

Additional Items to Consider

Work Program Models

No two Work College programs are the same. Each college structures their program so it best meets their educational program along with institutional resources and needs. Within programs there are multiple variations here are just a few examples:

- ➔ Corporate Work Program
- ➔ Student Managed Work Program
- ➔ Labor Departments
- ➔ Work Crews
- ➔ Cost of Tuition Covered
- ➔ Reduced Tuition for Work
- ➔ Program Focus

The Financial Equation and the Application of Funds

Compensation for student work is applied differently at each school. It is fully dependent upon a school's own resources, financial aid packaging for students, state minimum wage laws, along with hours that students participating in the program are required to work. There are Work Colleges that are tuition driven institutions, while others are not. Regardless of a college's financial situation work colleges are typically leaner operationally than more traditional institutions - with staff wearing multiple "hats." Implementing a full-on student work program (in some ways) parallels a typical HR Department, which includes the tracking of hours, processing payments for work performed, making sure work gets done, and performing employee evaluations.

Program Accreditation:

Some Work Colleges structure and include their work programs on the "academic" side of the house, thereby making them part of the regular accreditation process.



Work Program Basics

Key Elements for Program Implementation

- ➔ Work-learning-service is a stated part of the institution's educational philosophy and program
- ➔ ***All resident students and one-half of all full-time enrolled students must work***
- ➔ Students must work a minimum of 5 hours per week or 80 hours each semester
- ➔ Students work at on-campus or off-campus jobs, which helps to reduce the cost of their education
- ➔ Students must be trained on a regular basis; students must be paid for work performed and student work (performance) must be evaluated
- ➔ A record of work performance must be a part of the student college record
- ➔ Work Colleges are expected to provide programmatic leadership by college personnel for the comprehensive work-learning-service-program that is comparable to a traditional academic program. Most Work Colleges have "Work Deans" or the equivalent that oversee student work
- ➔ Faculty and Staff serve as work supervisors
- ➔ There are consequences for non-performance or failure in the work-learning-service program that parallel consequences for non-performance in a regular academic program
- ➔ Infrastructure should be put in place to effectively manage the work program which includes tracking student hours, evaluating student work, and maintaining a record of work performance
- ➔ Federal compliance for a Work Colleges Program includes Federal Work-Study Regulations, Work College Program Regulations, and the Fair Labor Standards Act
- ➔ The Federal Work-Study Program provides the operational and regulatory underlayment for the Work Colleges Program. The Work Colleges Program allows for more flexibility in the use of funds and requires additional institutional infrastructure and oversight



All Colleges Must Explicitly and Unequivocally Meet Regulatory Requirements

Frequently Asked Questions

Of primary importance is how an institution goes about meeting the federal requirements for operating a comprehensive work-learning-service program. The creation and implementation of a robust wide ranging “comprehensive work-learning-service program” must be operationally manageable, meet learning goals and objectives, support campus needs and be financially sustainable. It should be well integrated into your educational program. Regulation does not provide specifics on how an institution should structure or implement a “comprehensive work-learning-service program.” However, regulation provides enough latitude so colleges can implement a work program that best supports their mission, needs, and educational program. Consequently, just because one school does it one way - does not mean that it is appropriate for another college to adopt that operational standard. Each college’s situation and mission are different which include financial circumstances, modes of enrollment, and available resources. Having students work on campus costs money. Therefore, consideration of a work program must be thoughtfully woven into the fabric of each institution and take into account the institutional mission, expectations for student work-learning-service, institutional finances, available program resources, and program expectations.

Money - Will the federal Work Colleges Program save my institution money?

The simple answer is no. Work is mandatory for all resident students and one-half of all full-time enrolled students. Students must be compensated. Additionally, the operating infrastructure has fixed and variable costs, which is also impacted by enrollment. Therefore, in order to comply with federal regulations, you must have the needed infrastructure in place to support a “comprehensive work-learning service program” which includes:

- ➔ **Student payments:** All participating students must be paid (payroll cut and applied). Your college work force has now expanded beyond staff and faculty.
- ➔ **Dean of Work / Work Program Director / etc.** An individual dedicated to overseeing the work program just as you would have for an academic program.
- ➔ **Timekeeping:** Hours for student work need to be carefully tracked, as this directly affects institutional budgets. Therefore, a time keeping system or mechanism of some type should be put in place.
- ➔ **Work supervisors:** Depending on your current mode of operation, more supervisors might be needed.

- ➔ **Evaluation:** All student workers must be evaluated. Supervisor and program evaluation are also recommended if it is an integrated part of your educational programs.
- ➔ **Training:** There must be support and training for students and supervisors.

Are colleges eligible to receive federal funding through the Work Colleges Program?

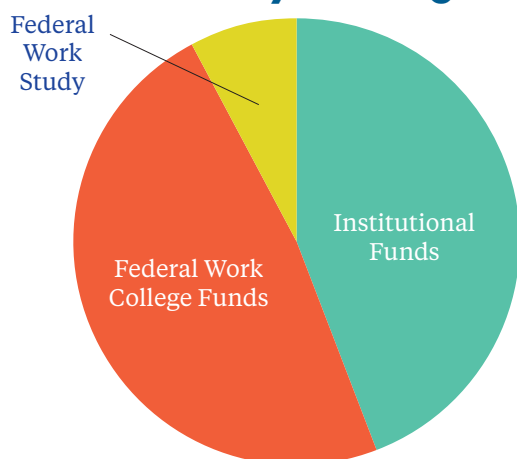
Yes, but only if your college qualifies as a federally approved Work College. Any Work College approved by the U.S. Department of Education is entitled to receive a portion of any available work colleges federal funding.

- ➔ Work Colleges funding comes through Federal Work-Study
- ➔ Work Colleges funding is a competitive grant and is NOT guaranteed
- ➔ Work Colleges funding must be requested through Congress every year. If the funding is not appropriated by Congress, funds are not available
- ➔ Funding does not increase automatically nor with the addition of a new institution. Therefore, when new colleges are approved individual college allocations will decrease unless additional funds are made available
- ➔ Any college awarded Work Colleges funding must match all federal funds dollar for dollar
- ➔ Work Colleges funding has broader latitude in its application than regular federal work-study
- ➔ Work Colleges funding is currently distributed among all the eligible colleges based on a formula which includes student federal work-study eligibility

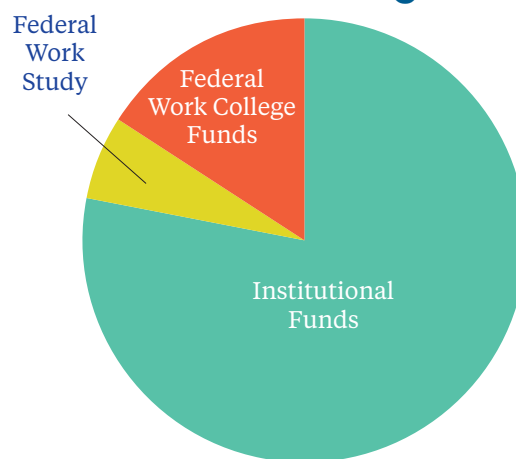
Will federal Work College funds help offset the cost of operating a Work Colleges Program?

Perhaps - additional federal funding might help offset some expenses. However, most schools find themselves in new territory with the administration of a “Work College” program. Most Work Colleges provide substantial amounts of institutional funding to help support and pay for their student work programs. As a federally designated Work College, ALL resident students and one half of all full-time enrolled students are required to work at least 80 hours per semester. Therefore, colleges have expanded their workforce and must pay students appropriately. Please refer to the following pie charts on pages 15-16 which show how each current Work College funds its program.

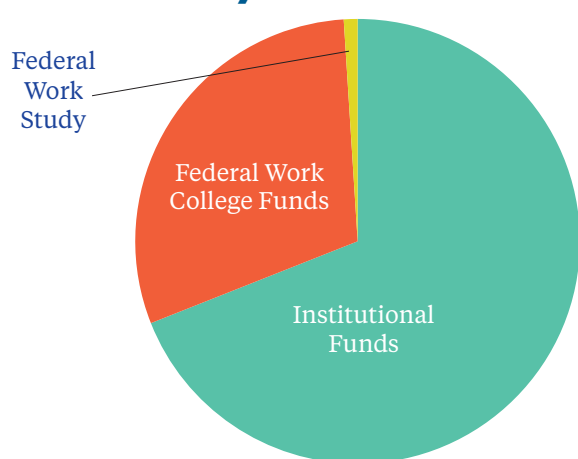
Alice Lloyd College



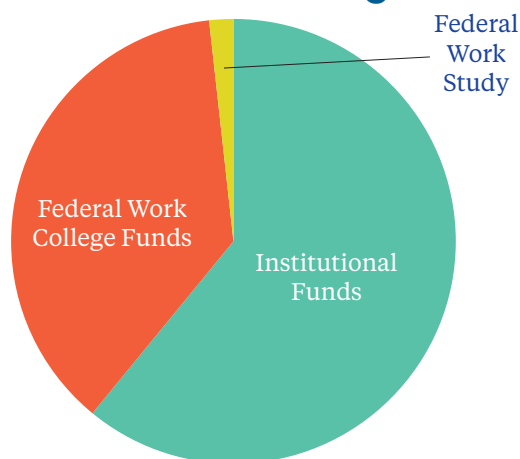
Berea College



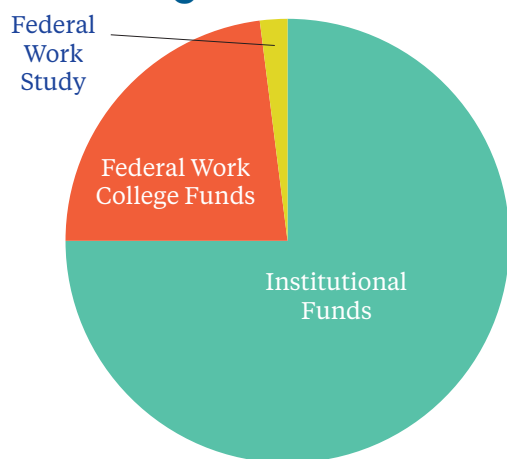
Bethany Global University



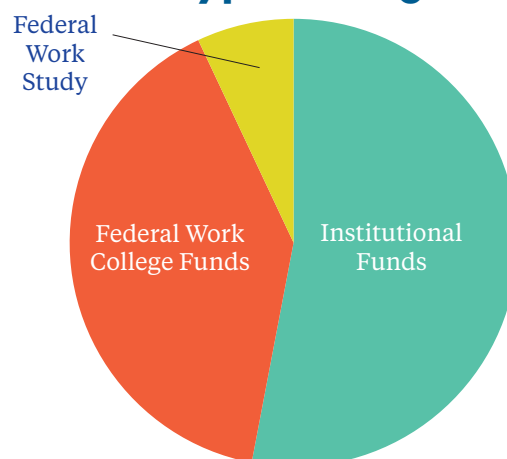
Blackburn College

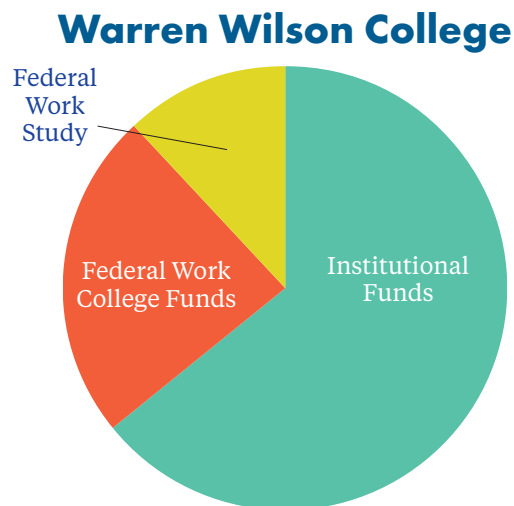
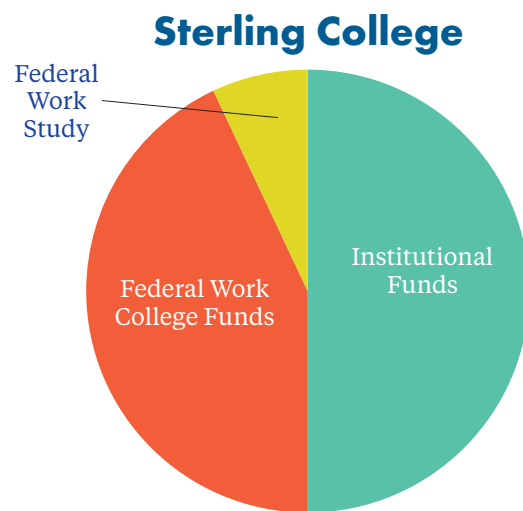
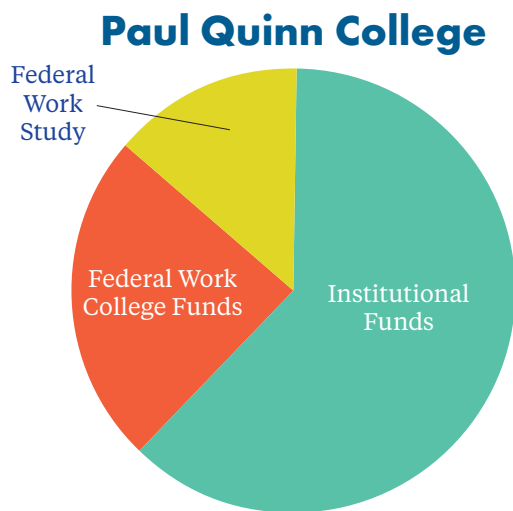


College of the Ozarks



Kuyper College





Why aren't there more Work Colleges?

- ➔ Work Colleges are not inexpensive to operate. While the model helps rein in costs for students, the colleges absorb the cost of program operation which includes additional layers of both required and necessary operational infrastructure. There are additional costs and budgetary implications associated with operating a full-on student work program.
- ➔ Faculty and staff take on additional responsibilities as they become work supervisors.
- ➔ Not all students are interested in working.

How Do Work Colleges Differ from More Traditional Institutions?

The main emphasis is on the academic programs at Work Colleges. The most notable difference between traditional institutions and Work Colleges is participation in the work-learning-service program. Attending a Work College is more affordable for students than many traditional institutions. Work serves to enhance and enrich the collegiate experience and also helps to reduce student debt. Work Colleges excel at cultivating career-ready qualities like responsibility and work ethic. Students work limited hours and gain valuable hands-on work experience while working alongside other students, faculty, and staff. Work assignments can support and complement a student's field of study. Work positions also introduce students to new opportunities including student-powered industries. There are hundreds of different campus positions. Work College students do it all and they are essential to the daily operations of their campuses. Their jobs provide earnings which go directly to reducing the cost of education. It is important to note that faculty and staff at Work Colleges take on the added responsibility of supervising students. When assistance is needed at Work Colleges, it is often a student that comes to the rescue.

What are some of the differences between Federal Work-Study and the Work Colleges Program?

- ➔ **Federal Work-Study** is an OPTIONAL choice for those students who meet financial requirements.
- ➔ At **Work Colleges**, all resident students are REQUIRED to work regardless of their financial circumstances. You cannot buy your way out of the "work program."
- ➔ Though FWS students receive a paycheck for their work, there is no formal program through work to help them pay for their college expenses. At Work Colleges, student earnings are considered scholarship or "self-help" payments and are applied directly to the cost of education.
- ➔ There are no formal support systems, evaluations, or performance measures for **Federal Work-Study**.
- ➔ Students at Work Colleges must show up for work, they are given responsibility and counted upon to do their jobs. Students can be dismissed from school for non-performance in the work program, similar to an academic program.
- ➔ Work College students contribute directly to the daily operation of their campus. We often say, "if the students didn't show up work, the colleges could not operate."

Colleges interested in the Work Colleges Program must ask the following questions to evaluate if the model is right for their institution:

- ➞ Is there an existing culture at your institution that embodies work and service?
- ➞ Why implement a student work program? What is the intent of having a student program and what are the goals?
- ➞ How does student work align with your educational program and college mission?
- ➞ What is your institution trying to accomplish through student work?
- ➞ Can the college afford to operate a student work program?
- ➞ What do you hope your students will learn from the student work experience?
- ➞ How will student work impact your faculty and staff?
- ➞ Can your institution provide or build the necessary infrastructure to support and operate a successful work program?
- ➞ What is your expectation for students working at on-campus or off-campus jobs?
- ➞ What do you expect from off-campus employers?
- ➞ How will supervisors be trained and supported?
- ➞ How will student hours be tracked?
- ➞ How will you evaluate work performance and maintain it as part of the student's college record?

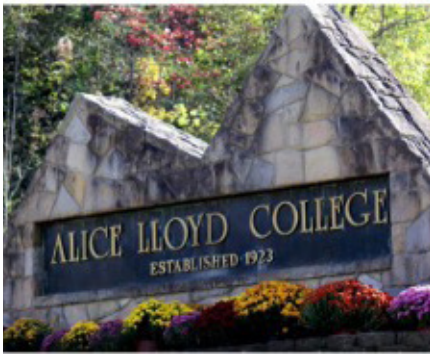


Important Caveat

The focus of this guide is to help existing work colleges and those institutions interested in adopting or further exploring the work college model. Therefore, it is assumed that institutions using this guide are already operating a robust Federal Work-Study (FWS) program at their institution.

Federal Work-Study provides the operational underlayment for the federal Work Colleges Program. You cannot operate a Work Colleges Program without having successfully navigated the ins and outs of federal work-study. This guide will highlight areas where FWS and WCP intersect and are critical to work college program operations.

**The 2022-2023 Federal Work-Study Program Handbook can be found here:
<https://fsapartners.ed.gov/knowledge-center/fsa-handbook/2022-2023/vol6/ch2-federal-work-study-program>**



Meet the Members of the Work Colleges Consortium

- ➔ Alice Lloyd College, KY
- ➔ Berea College, KY
- ➔ Bethany Global University, MN
- ➔ Blackburn College, IL
- ➔ College of the Ozarks, MO
- ➔ Kuyper College, MI
- ➔ Paul Quinn College, TX
- ➔ Sterling College, VT
- ➔ Warren Wilson College, NC

S.2

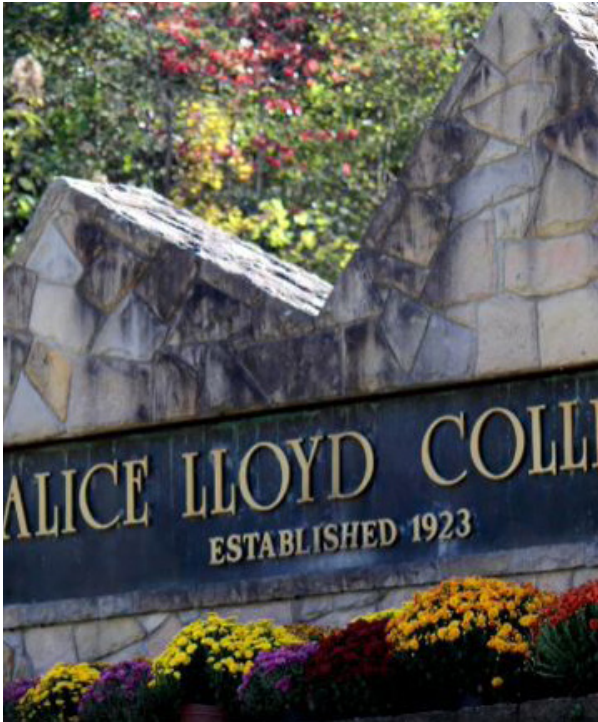
MEET THE MEMBERS OF THE WORK COLLEGES CONSORTIUM

Currently, there are ten federally recognized Work Colleges and nine are members of the Work Colleges Consortium. These institutions are small, private, liberal arts colleges with modest enrollments that range from about 150 to approximately 1,600 students. Each school is unique and operates the work program in a slightly different fashion. However, “work-learning-service” is a central component of each Work College. Student work, coupled with robust academics and a spirit of service, is a common denominator shared by all of the Work Colleges.

Regulation Requires:

“Is an integral and stated part of the institution’s educational philosophy and program.”





Alice Lloyd College

Pippa Passes, KY

Mission Statement

The mission of Alice Lloyd College is to educate mountain people for positions of leadership and making education available to qualified mountain students regardless of their financial situation.



Berea College

Berea, KY

Mission Statement

Berea College offers a high-quality education to academically promising students with limited economic resources. It awards every student a Tuition Promise Scholarship so that no Berea student ever pays tuition. Founded in 1855, Berea is the first interracial and coeducational college in the South. “Berea has not charged students tuition since 1892. Every student is required to work, and its labor program is like work-study on steroids.”

Adam Harris, The Atlantic, October 2018



Bethany Global University

Bloomington, MN

Mission Statement

A Global Missions College with a Practical Training Program. Hands-on Training: Undergraduates get hands-on work experience through practical training and local outreach while on campus and then spend 16 months overseas learning while doing missions during their global internship.



Blackburn College

Carlinville, IL

Mission Statement

Blackburn College offers the only Work Program in the nation exclusively managed by students. For more than 100 years, Blackburn has crafted a program that not only makes a transformational education more attainable but adds incredible dimension to the traditional college experience. This is college - plus so much more. Students help plan and run day-to-day operations of an institution fully invested in them, often leading and managing teams of their peers, gaining essential ready-for-the-workforce skills and a four-year head start on their careers. Blackburn is forward-thinking and forward-looking - in the classroom and on the job - helping the next generation of leaders, problem solvers, and creative thinkers rise and shine.



College of the Ozarks

Point Lookout, MO

Mission Statement

The mission of College of the Ozarks is to provide the advantages of a Christian Education for youth of both sexes, especially those found worthy but who are without the sufficient means to procure such training. At *HARD WORK U.* – No tuition is charged, all students work on campus, debt is openly discouraged, and no federal, state, or private loans are made.



Kuyper College

Grand Rapids, MI

Mission Statement

Kuyper College is a leading Christian college that prepares students for ministry, service, and professional vocations. A Kuyper education is rooted in love of God and neighbor, is holistic as we believe all of life involves learning and springs from our community which functions as an academic, social, and spiritual community, encouraging each other in the process of learning. KuyperWorks™ is our innovative program integrating the learning that happens in the classroom with learning within workplace environments on and/or off campus.

The purpose of the program is to contribute to the education of the whole person by facilitating significant opportunities for students to grow in character, work ethic, problem solving, critical thinking, responsibility, time management, leadership, and essential areas of professional competency while at the same time making a quality college education affordable and accessible.



Paul Quinn College

Dallas, TX

Mission Statement

Urban Work College with a unique Urban Scholars and Corporate Work Programs. The vision of the Paul Quinn College Work Program (“the Work Program”) is to transform ability into action and potential into achievement by encouraging all students to embrace the ideals of disciplined work, servant leadership, and initiative in preparation for lives of financial freedom, community engagement, and outstanding character.



Sterling College

Craftsbury Common, VT

Mission Statement

Sterling College uses education as a force to advance ecological thinking and action through affordable experiential learning that prepares people to be knowledgeable, skilled, and responsible leaders in the communities in which they live. Sterling was among the early initiatives in the United States to combine academic study and practical training in an effort to prepare changemakers. Sterling offers degrees in Ecology, Sustainable Agriculture & Food Systems, Environmental Humanities, Outdoor Education, and a self-design option. As a Work College, students engage in jobs that tie to these majors with positions such as Green Bikes Manager, Lab Associate, Draft Animal Associate, and Adventure Coordinator.



Warren Wilson College

Asheville, NC

Mission Statement

The Warren Wilson way - Academics, work, and service. A liberal arts college grounded in social responsibility, where hard work and community are more than just words. Since the 1970s, Warren Wilson College has grown and changed into the contemporary liberal arts institution that it is today, but we haven't forgotten our roots in the Asheville Farm School. We remain dedicated to a curriculum of "learning by doing," which informs our commitments to community engagement, our work program, and our emphasis on original student research.



Federal Work-study Programs and Regulations



s.3

S.3

FEDERAL WORK-STUDY PROGRAMS AND REGULATIONS

The Work Colleges Program is one of three programs housed under Federal Work-Study:

➔ **Federal Work-Study Program**

It is critical to have a strong working knowledge of the Federal Work-Study Program to implement and operate an effective “comprehensive work-learning-service” program properly and successfully. An overview will be provided for each section (where appropriate) along with examples of implementation.

Regulations for Federal Work-study – The Federal Work-Study Program Handbook:

https://fsapartners.ed.gov/sites/default/files/2022-2023/2022-2023_Federal_Student_Aid_Handbook/_knowledge-center_fsa-handbook_2022-2023_vol6_ch2-federal-work-study-program.pdf

➔ **Work Colleges Program**

The Federal Work-Study Program provides the operational and regulatory underpinnings for the Work Colleges Program. The Work Colleges Program regulatory requirements are an overlay to Federal Work-Study Program with additional educational program requirements and more flexibility in the application and use of funds.

The Work Colleges Federal Regulations:

<https://www.ecfr.gov/current/title-34/subtitle-B/chapter-VI/part-675/subpart-C>

➔ **Job Location Development**

JLD is a federally funded offshoot of the federal work-study program, which connects students of financial need to part-time employment. Unlike work-study, JLD aims to help students regardless of financial need. The program provides funding primarily to cover the salary of the JLD coordinator, who locates and develops part-time jobs off campus for students. JLD coordinators also collect data and compile and submit a report annually to the federal government that details the number of students for whom jobs were located and the total earnings of those students.

The program structure relies on the coordinator to determine how the program should be set up. In most cases, the coordinator conducts site visits to local employers while also maintaining the university's job posting service. Typically, when the position is housed in career services, the coordinator provides career coaching through one-on-one student appointments.

From NACE May 2020

<https://www.nacweb.org/career-development/organizational-structure/op-ed-the-great-debate-should-job-location-development-be-housed-in-career-services/#:~:text=WHAT%20IS%20JLD,one%20student%20appointments>



Highlights of the Federal Work Colleges Program

Federal Requirements

The purpose of the Work Colleges program is to recognize, encourage, and promote the use of comprehensive work-learning-service as a valuable educational approach when it is an integral part of the institution's educational program and a part of a financial plan that decreases reliance on grants and loans and to encourage students to participate in community service activities. 675.43

A public or private non-profit, four-year, degree-granting institution with a commitment to community service that is recognized by the U.S. Department of Education as a federally designated Work College that has successfully operated a **Comprehensive Work-Learning-Service Program** for at least 2 years. The program **must** meet all the requirements listed below. 675.41(a)(1)-(2)

- ➡ A comprehensive work-learning-service program **must** be an integral and stated part of the institution's educational philosophy and program. 675.41(b)(1)
- ➡ A comprehensive work-learning-service program **requires** all resident students including at least one-half of all students who are enrolled on a full-time basis, to participate in the comprehensive work-learning-service program for at least 5 hours each week or at least 80 hours during a period of enrollment. 675.41(a)(3) 675.41(b)(2)
- ➡ A comprehensive work-learning-service program does **not require** participation during summer school or during the regular term if the student is engaged in an institutionally organized or approved study abroad or externship / internship. 675.41(a)(3)
- ➡ A comprehensive work-learning-service program **must** include learning objectives, evaluation of student work and a record of work performance as part of the student's college record. 675.41(b)(3)
- ➡ A comprehensive work-learning-service program **must** include programmatic leadership, by college personnel, at a level comparable to traditional academic programs. 675.41(b)(4)
- ➡ A comprehensive work-learning-service program **must** recognize the educational role of the work-learning-service supervisors. 675.41(b)(5)
- ➡ A comprehensive work-learning-service program **must** include consequences for nonperformance or failure in the program similar to consequences for failure in the regular academic program. 675.41(b)(6)

Allowable Costs, Federal Share, and Institutional Share 675.45

Allowable costs. A federally designated Work College can utilize allocated or reallocated program funds to carry out the following activities listed below.

- ➡ Support the educational costs of qualified participating students through self-help payments or credits. 675.45(a)(1)

- ➔ Promote the WLS experience as a tool of postsecondary education, financial self-help, and community service-learning opportunities. 675.45(a)(2)
- ➔ Carry out activities in the Higher Education Act (HEA) section 443 Grants for Federal Work-Study Programs. 675.45(a)(3)
- ➔ Carry out activities in the HEA section 446 Job Location and Development Programs. 675.45(a)(3)
- ➔ Administer, develop, and assess comprehensive work-learning-service programs including
 - ⊙ Community-based WLS alternatives that expand community service and career-related work and
 - ⊙ Alternatives that develop sound citizenship, encourage student persistence, and utilized WLS to support education and student development. 675.45(a)(4)
- ➔ Coordinate and carry out joint projects to promote WLS. 675.45(a)(5)
- ➔ Carry out a comprehensive, longitudinal study of academic progress and academic and career outcomes, related to student self-sufficiency in financing their higher education, repayment of student loans, continued community service, kind and quality of service performed, and career and community service selected after graduation. 675.45(a)(5)

Federal share of allowable costs. An institution, in addition to the funds allocated and reallocated for this program, may use transferred funds provided under its Federal Perkins Loan or its FWS program to pay allowable costs.

Institutional Share of Allowable Costs. Work Colleges Program funds **must** be match dollar for dollar by institutional non-governmental funds. In other words, the federal share **may not** exceed 50 percent. 675.45(c)



Regulation in Practice

s.4

- ➔ School Program Participation
- ➔ Student Employment Regulations
- ➔ Payments to Students
- ➔ Records Non-Cash Contributions
- ➔ School Examples of How Students are Paid

S.4

REGULATION IN PRACTICE WITH SCHOOL EXAMPLES

Regulation requires resident students, including at least one-half of all students who are enrolled on a full-time basis, to participate in a comprehensive work-learning-service program for at least five hours each week, or at least 80 hours during each period of enrollment, except summer school, unless the student is engaged in an institutionally organized or approved study abroad or externship program.

Beyond the federal regulations, what additional requirements does your school have for participation in the work-learning-service program?					
	Alice Lloyd College	Berea College	Bethany Global University	Blackburn College	College of the Ozarks
Do you require 100% of ALL students (full-time, part-time, commuters, etc.) to participate in the work-learning-service program?	No	Yes	Yes	No	No
If not ALL students are required to participate in the work-learning-service program, what is the approximate percentage of students participating in the program?	99%			95%	99.3%
Do you require full-time commuting students to participate in the work-learning-service program?	Yes	Yes	Yes	No – student choice	Yes
Do you require part-time commuting students to participate in the work-learning-service program?	No	Yes	No	No	No
Do you have any full-time, online students that participate in the work-learning-service program?	No	Yes*	No	No	No
Are there any students on your campus that do not participate in the work-learning-service program?	Yes, part-time students	Yes, students doing a teaching or nursing clinical practicum	No	Yes, commuter students can opt into the program if they are enrolled full-time	Yes, only full-time students can participate in the program

Beyond the federal regulations, what additional requirements does your school have for participation in the work-learning-service program? (cont.)				
	Kuyper College	Paul Quinn College	Sterling College	Warren Wilson College
Do you require 100% of ALL students (full-time, part-time, commuters, etc.) to participate in the work-learning-service program?	No	No	No	No
If not ALL students are required to participate in the work-learning-service program, what is the approximate percentage of students participating in the program?	55-65%	70% of eligible enrollment	90-95%	90-92%
Do you require full-time commuting students to participate in the work-learning-service program?	No – student choice	No – student choice	No – student choice	No – student choice
Do you require part-time commuting students to participate in the work-learning-service program?	No – student choice	No – student choice	No- student choice	No – student choice
Do you have any full-time, online students that participate in the work-learning-service program?	No	Student choice	No	No
Are there any students on your campus that do not participate in the work-learning-service program?	Outside of those who are not required, there is not anyone that does not participate.	Yes. Part-time students who commute to campus or who are 100% online do not participate in the Work Program. Full-time students who reside in off-campus Paul Quinn housing, independent, non-traditional or employed full-time on their own do not participate in the Work Program.	Yes, students with a documented medical condition that apply for a waiver.	Yes. There are two low residency masters' programs that are on campus for two weeks (summer and winter). They do not participate in the program.

Compensating Students for Work

Work Colleges share the goal of helping students reduce college debt. Wages are considered “self-help payments.” Wages at most Work Colleges are applied directly to the cost of education. Students contribute financially to the cost of their education through participation in the “comprehensive

work-learning-service program.” Some colleges provide a “grant” to cover the cost of tuition, while other colleges provide reduced tuition to students. All Work Colleges comply with appropriate state and federal employment laws. Just like employees in any work position, students **must** work required hours to be paid appropriately. Students who work over the required number of hours **must** be compensated. Students who work under hours **must** make up hours or reimburse the institution.

Payments to Students

- ➔ A student work supervisor, an official of the institution or off-campus agency, **must** certify that each student has worked and earned the amount being paid. The certification **must** include a time record showing the hours each student worked in a clock time sequence. 675.19(b)(2)(i) Undergraduate students can only be paid based on hours worked (hourly wage). However, employed graduate student workers can receive a salary or an hourly wage for work performed. 675.24(a)(3)
- ➔ Student Workers **must** be paid the hourly minimum wage as required by the federal, state, or local government agency, whichever is higher, where the work was performed and the Fair Labor Standards Act. FWS 675.24(b)
- ➔ Student workers **must** receive payment for work performed at least once a month. FWS 675.16(a)(2)
- ➔ Before the start of the school year or term the student workers **must** be informed of the amount of funds they can receive and when compensation will be paid. FWS 675.16(a)(3)
- ➔ The Work College **must** obtain authorization from the student worker to use FWS or Work Colleges Program (WCP) payments to apply to a student’s account (Tuition fees, or other educational related charges). FWS 675.16(b) See Records of Non-Cash Contributions at the end the “Payments to Students” section.
- ➔ A Work College can choose to pay a student its institutional FWS/Work Colleges Program (WCP) share (non-federal dollars) in the form of tuition, fees, services, or equipment. This does not require any authorization from the student. FWS 675.16(e) See Records of Non-Cash Contributions at the end the “Payments to Students” section.
- ➔ A Work College **must** ensure that no office can both authorize student work payments and disburse payments to student workers. 675.19(a)
- ➔ A Work College **must** maintain fiscal records that include a payroll voucher that support all payroll disbursements and **must** also maintain records of any institutional (non-federal) student earnings that are applied in the form of tuition, fees, services, or equipment. All records **must** be reconciled monthly. 675.19(b)(2)(ii)-(III)-(iv)
 - The **payroll voucher** should include name of the institution and address; the student’s name; the student work position; number of hours worked during the

pay period; the student's hourly rate of pay, student's gross earnings; and include identification of any noncash payments made for work during the period. Federal Work -Study Programs Handbook – section Payroll Vouchers

- ➔ The federal share of FWS compensation may not exceed 75 percent. 675.26(a)(1)
- ➔ The federal share of WCP compensation may not exceed 50 percent. 675.45(c)

Records of Non-Cash Contributions

There are two cases under which students may not receive the net FWS earnings identified on their payroll voucher.

In the first case, a student who has FWS earnings at a school that provides its FWS institutional match with cash has provided written permission for the school to credit part of the student's earnings to the student's account. A school **must** obtain a separate written authorization from a student before any part of the student's FWS cash earnings may be credited to the student's account at the school. The school **must** maintain that authorization in the student's file. In addition, the school **must** provide a clear audit trail showing that the student received credit on the student's account for any earnings not paid directly to the student.

The second case involves schools that provide part (or all) of their FWS institutional match with credit for tuition, fees, services, or equipment. A school that provides its institutional match with tuition, fees, services, or equipment does not need to obtain a student's permission. However, before employing a student, this type of school **must** provide the student with a written explanation of this procedure, including the specific percentage of the student's earnings that the student will receive in credit for tuition, fees, services, or equipment. Moreover, before the close of the student's final scheduled payroll period, the school **must** give the student a statement that itemizes the total amount of tuition, fees, services, or equipment credited to the student's account from the student's FWS earnings. In addition, the school's records **must** provide a clear audit trail showing that the student received credit on the student's account for any earnings not paid directly to the student.



How Students are Compensated for Work

How Schools Address Student Compensation					
	Alice Lloyd College	Berea College	Bethany Global University	Blackburn College	College of the Ozarks
Do students receive some type of a work grant, self-help grant or scholarship? If so, what is the value of the award each semester?	Yes \$1,160	Yes \$4,500 Labor Grant	Yes \$3,337.50	Yes \$2,500	Yes \$6,628
During the academic year, is student compensation / student wages applied directly as a tuition credit or "self help" grant?	Yes	Yes	Yes	Yes	Yes
During the summer/breaks, is student compensation / student wages applied directly as a tuition credit or "self help" grant?	No	Yes	Yes – summer No – breaks	No	No
Do students receive an actual paycheck? Please explain.	No	Yes*	No	No	No
During the academic year, do students receive any compensation (e.g., paycheck) that is not applied directly to the cost of education?	No	Yes	No	Yes	No
During the summer/breaks, do students receive any compensation (e.g., paycheck) that is not applied directly to the cost of education?	Yes	Yes	Yes	Yes	No
How often are students paid for work?	Monthly	Monthly	Monthly	Bi-weekly	Weekly
Do all students receive the same rate of pay during the academic year?	No	No	No	Yes	Yes
If all students receive the same rate, what is the current rate of pay during the academic year?				\$12/hour	\$11.15/hour

How Schools Address Student Compensation

	Alice Lloyd College	Berea College	Bethany Global University	Blackburn College	College of the Ozarks
If students do not receive the same rate, how is the pay rate determined (e.g., year in school, work assignment, etc.)?	\$7.25/hour standard student worker \$7.75/hour student supervisor	By the duties and responsibilities of the labor position. There are one to six work-learning-service levels.	Based on year in school: \$14.51/hour freshman & sophomores \$16.61/hour seniors	The rate for paid hours is \$12 per hour and the ability to receive paid hours is determined by the manager of the department and the supervisor.	
Are students paid the state minimum wage or higher?	It depends on the position	Higher	Higher	Higher	Minimum Wage
If students work during breaks, do they receive the same rate of pay as the academic year?	Yes	Yes	Yes	Yes	Yes
If students work during the summer, do they receive the same rate of pay as during the academic year?	Yes	Yes	Yes	Yes	Yes
If students work during the breaks and summer, what funds are used for student payment (e.g., federal funds or institutional funds)?	Institutional Funds	Federal Funds and Institutional Funds	Federal Funds and Institutional Funds	Institutional Funds	Federal Funds and Institutional Funds**
Who processes student payroll?	Work Office	Work Office	Student Financial Aid and Work Office	Work Office and Human Resources	Cash Accounts Office

**At Berea College, students receive a small monthly paycheck for personal expenses*

***At College of the Ozarks, summer work is paid with institutional funds and is applied to room and board for the upcoming year. Freshman students on the 12 week "Summer Work Educational Program" take classes as part of Base Camp. Students work 40 hours per week for 3 weeks and 35 hours per week for 9 weeks.*

How Schools Address Student Compensation (cont.)

	Kuyper College	Paul Quinn College	Sterling College	Warren Wilson College
Do students receive some type of a work grant, self-help grant or scholarship? If so, what is the value of the award each semester?	Yes. 150 hours = \$2,025 225 hours = \$3,337.50 300 hours = \$4,050	Yes. Students receive a Work Program Scholarship and a stipend. On campus work program = \$2500/semester Corporate work program = \$3000 or \$4500/semester depending on corporate work tier	Yes, students receive a tuition credit. The amount varies based on job level.	Yes 120 hours at \$9.05/hour = \$1086 for the semester 180 hours at \$9.05/hour = \$1629 for the semester 240 hours at \$9.05/hours = \$2176 for the semester
During the academic year, is student compensation / student wages applied directly as a tuition credit or "self help" grant?	Yes	Yes	Yes	Yes
During the summer/breaks, is student compensation / student wages applied directly as a tuition credit or "self help" grant?	No	Yes	Sometimes	No
Do students receive an actual paycheck? Please explain.	No, not as part of the work program. But if students take on additional work or day labor, the compensation is provided to students as a paycheck.	Yes, students receive a stipend that is paid monthly.	No	No
During the academic year, do students receive any compensation (e.g., paycheck) that is not applied directly to the cost of education?	No	Yes	No	No
During the summer/breaks, do students receive any compensation (e.g., paycheck) that is not applied directly to the cost of education?	Yes. Summer is paid traditionally and is not part of the work program currently.	Yes. If the student has a balance, compensation will be applied to the balance first.	Depends	Yes – summer Yes – breaks
How often are students paid for work?	Students are awarded the full amount at the beginning of the semester based on the hours for which they have been hired (150, 225, 300). Students are provided a bi-weekly work summary that identifies the number of hours worked during that period and the value of that work.	Monthly	If students are paid, they are paid via Sterling payroll which is bi-weekly	Monthly
Do all students receive the same rate of pay during the academic year?	Yes	No	No	Yes

How Schools Address Student Compensation (cont.)

	Kuyper College	Paul Quinn College	Sterling College	Warren Wilson College
If all students receive the same rate, what is the current rate of pay during the academic year?	\$13.50/hour		\$10.50/hour matched in financial aid	\$9.05/hour
If students do not receive the same rate, how is the pay rate determined (e.g., year in school, work assignment, etc.)?		See below for an explanation*	Leadership Level	
Are students paid the state minimum wage or higher?	Higher	Higher	Higher	Higher
If students work during breaks, do they receive the same rate of pay as during the academic year?	No	Yes		Yes
If students work during the summer, do they receive the same rate of pay as during the academic year?	Yes	Yes	Yes	Yes
If students work during the breaks and summer, what funds are used for student payment (e.g., federal funds or institutional funds)?	Institutional Funds	Federal Funds and Institutional Funds**	Federal Funds and Institutional Funds**	Federal Funds and Institutional Funds
Who processes student payroll?	Human Resources	Work Office and Human Resources	Business Office	Work Office and Human Resources

***Paul Quinn College:** Pay rate is determined by the work assignment and the tier. On-campus positions are \$6,000 per year and \$5,000 is applied to the Work Program Scholarship and the remaining \$1,000 is given to the student as a stipend and divided out monthly. For the Corporate Work Program (for profit): \$15,000 per year and \$9,000 is applied to the Work Program Scholarship and the remaining \$6,000 is given to the student as a stipend and divided out monthly. For the Corporate Work Program (non-profit): \$10,000 per year and \$6,000 is applied to the Work Program Scholarship and the remaining \$4,000 is given to the student as a stipend and divided out monthly.

****Paul Quinn College:** Federal funds are used in the summer if not all allocated funds have been used. Students who are available to work in the summer are hired to earn unused federal funds. Institutional funds are used to pay for summer work of students in essential positions, when there are no federal funds remaining. For example, the IT Office uses student workers year round. Off-campus Corporate Work Students who are working in the summer are paid by their corporate partner.

Paul Quinn College: Work Program Scholarships are applied at the beginning of each semester (Fall and Spring) and stipends are paid as students reach hours worked and milestones on a monthly basis. A student who does not complete their assigned hours will lose a pro-rated Work Program Scholarship amount, after being provided with the opportunity to make up missed hours.

General Work Practices

- ➔ Employment Conditions
- ➔ Regulation Regarding Student Work Education
- ➔ School Examples: Assigning of Jobs, Tracking of Hours, Summer Work, etc.
- ➔ Record of Work Performance
- ➔ Student and Program Evaluation
- ➔ Service at Work Colleges

S.5

GENERAL WORK PRACTICES

Employment Conditions

- ➔ A Work College can, with a written agreement, employ student workers with an outside government or private non-profit or profit organization. The agreement **must** set forth FWS/Work College Program education and supervision requirements; work and payment conditions; and whether the institution or the organization/agency shall pay the students employed. 675.20(b)(1)-(b)(2)-(b)(3)(i)-(ii)-(b)(4) However, regardless of who employs the student the institution is responsible for ensuring the student is paid for work performed. 675.16(a)(4)
- ➔ Regardless of the student employer (institution or off campus organization or agency) the student's work **must** be governed by employment conditions, including pay, that meet any applicable Federal, State, or local law – this includes the Fair Labor Standards Act, Homeland Security regulations, and any/all that apply. 675.20(c)(IV)
- ➔ A student may be employed during periods of nonattendance, such as a summer term, an equivalent vacation period, the full-time period of a cooperative education program, or an unattended fall or spring semester. The student **must** be planning to enroll for the next period of enrollment and **must** have demonstrated financial need for that period. 675.25(b) Federal Work-Study Programs Handbook – section earnings for periods of non-attendance.
- ➔ If a student is employed by a Federal, State, or local public agency, or a private nonprofit organization the work performed **must** be in the public interest. The Department of Education Secretary considers work in the public interest to be work performed for the national or community welfare rather than work to benefit a particular interest group. 675.22
- ➔ FWS and Work College Program employment may not impair existing service contracts, displace employees, fill jobs that are vacant because employees are on strike, or involve the construction, operation, or maintenance of any part of a facility used or to be used for religious worship or sectarian instruction. 675.20(c)(i)-(ii)-(iii)-(iv)

Regulation Regarding Student Work Education

Federal Work-Study and Work Colleges Regulations, as they apply to Student Work Education and Training, Community Service, Payments to Students, and Employment Conditions

- ➔ The student's employment should reinforce the student's educational program or career goals. FWS 675.8(d)
- ➔ A student worker can receive academic credit for work performed if enrolled in an internship, practicum or employed in a research, teaching, or other assistantship. However, the student cannot be paid for receiving instruction in an academic setting. 675.20(d)(i)-(ii)-(iii) and 675.20(d)(2)(ii)
- ➔ Job descriptions for all WLS positions should be a part of the control procedures included in your school's policies and procedures manual. A written job description will help you ensure that the position is one that qualifies under the WLS program regulations. Federal Work-Study Programs Handbook – Job Descriptions.
- ➔ If the student employment is with a for-profit organization the work performed **must** be academically relevant to the student's educational program. In addition, the institution may only use up to 25% of its FWS/WCP allocation for working students in for-profit organizations. 675.23(a) & (b)(1)
- ➔ A Work College may pay students for a reasonable amount of time spent for training that is directly related to FWS/WCP employment. 675.18(h)(1) A reasonable training period is one that occurs immediately before the student begins the regular duties of the employment and does not exceed 20 hours. Federal Work-Study Programs Handbook – section Payment for FWS Training and Travel.



How Schools Address Job Assignments, Hours Worked, Summer Work, etc.

	Alice Lloyd College	Berea College	Bethany Global University	Blackburn College	College of the Ozarks
Do you allow students to have more than one work assignment or position on campus?	Yes	Yes	No	Yes	No
Do you allow students to have additional off-campus jobs outside of the required work assignment?	Yes	No	Yes	Yes	Yes
What percentage of students have a work assignment on campus?	99.65%	99%	85%	94%	99.3%
What percentage of students have a work assignment off campus?	0.35%	1%	15%	6%	0%
In general, how are work assignments determined for first-year students?	*Random Assignment *Student Interest Survey *Resume *Previous Work Experience *Student Request *Requested by Supervisor	*Random Assignment *Resume *Previous Work Experience *Requested by Supervisor	*Student Interest Survey *Resume *Previous Work Experience *Requested by Supervisor	*Random Assignment *Student Interest Survey *Previous Work Experience *Student Request *Requested by Supervisor **See below for additional comments	*Student Interest Survey *Previous Work Experience *Needs of the College
In general, how are work assignments determined for upper-class students?	*Random Assignment *Student Interest Survey *Resume *Previous Work Experience *Student Request *Requested by Supervisor	*Resume *Previous Work Experience *Student Request *Requested by Supervisor *Student requests an interview with supervisor	*Student Interest Survey *Resume *Previous Work Experience *Student Request *Requested by Supervisor	*Random Assignment *Resume *Previous Work Experience *Student Request *Requested by Supervisor **See below for additional comments	*Student Interest Survey *Resume *Previous Work Experience *Student Request *Requested by Supervisor
Are students allowed to change work assignments during the academic year?	Yes	Yes	Yes	Yes	No
If students are allowed to change work assignments, when and under what circumstances?	Change in need, change in schedule, supervisor request, accommodate special needs	Within seven working days of the start of the semester. Both supervisor and student must agree. Or for student accommodation or concerns.	This would happen primarily due to an injury or sickness that results in a student being unable to perform work functions	If positions are open, students can apply and interview for a new job (based on meeting necessary requirements for the position)	

How Schools Address Job Assignments, Hours Worked, Summer Work, etc.

	Alice Lloyd College	Berea College	Bethany Global University	Blackburn College	College of the Ozarks
How many hours are students required to work each week?	10	10	15	10	15 hours for 16 weeks and one 40 hour week
How many hours are students required to work each semester?	160	160 varies by number of days	230	160	280
Do all students work the same number of hours?	No	No	No	Yes and No	Yes
Is there a range (or variability) in the number of hours student work?	Yes. Students can apply for 15-20 hours of work.	Yes. Student contracts range from 10-20 hours each week.	Yes. Seniors work 200 hours during their final semester on campus. January Freshmen also work a summer semester of 192 hours.	Yes. All students work the same number of tuition hours. No. Students work different number of stipend hours / paid hours. Not all students receive a stipend or paid hours.	No
How do you track student hours?	Manual recording and Timecards	Electronic time keeping system	Electronic time keeping system and timecards	Electronic time keeping system (most students) and Manual Recording (for Resident Assistants and Resident Advisors)	Electronic time keeping system
What actions are taken if a student does not work the assigned number of hours?	Write up and meet with Dean(s)	The student can go on labor probation, not be allowed to participate in certain activities, and must make up the hours the following term.	If the student works less than 95% of the assigned number of hours, they will not receive the maximum award amount and will have to pay the remaining balance of tuition	There are two options. Typically, students are required to pay back the hours to the institution. The second option is for students to roll a designated number of hours (there is a cap) from fall to spring. Students cannot roll over hours from spring to fall.	Student receives counseling from the Dean of Work Office

How Schools Address Job Assignments, Hours Worked, Summer Work, etc.

	Alice Lloyd College	Berea College	Bethany Global University	Blackburn College	College of the Ozarks
What happens if a student works more than the assigned number of hours	The student is compensated or the time for the following semester is adjusted.	The student is frozen out of the timekeeping system once the contract hours are met. It is likely their term bill will increase.	Students that exceed the assigned number of hours per semester can start to fulfill hours for the following semester (within the same academic year). If they exceed 460 hours for the academic year, a modification is made to the student's financial aid package, the student may lose the ability to select a PT assignment for the following year, and disciplinary actions are applied to the PT student that can result in expulsion from the program.	Students are paid the overage at the paid hour rate.	Students are not prohibited from working extra hours.
Approximately, what percentage of students work during the summer?	18%		20%	10%	45%
Is summer work considered a part of the work-learning-service program or educational program (e.g., evaluation, supervision)?	No		Yes	No	Yes
Are students required to take classes during the summer in order to work?	No		No	No	No
How many hours do students typically work during the summer?	40 hours per week		20 hours per week	32-40 hours per week for 11-12 weeks	40 hours per week
Do you have students working over semester breaks?	Yes		Yes	Yes	Yes
If so, approximately what percentage of students work over breaks?	8%		Less than 1%	8% (winter break) 7% (spring break)	50%

How Schools Address Job Assignments, Hours Worked, Summer Work, etc.

	Alice Lloyd College	Berea College	Bethany Global University	Blackburn College	College of the Ozarks
Is “break work” considered part of the work-learning-service program or educational program (e.g., evaluation, supervision)?	No		No	No	Yes
Do you provide workers compensation to students?	Yes		Yes	No	Yes

**** Blackburn College**

In general, how are work assignments determined for first-year students?

We use a combination of tools to assign students to their first position. During the admissions process the student is asked to complete a work program survey which asks for their work experience and to rank their preference. If the preference can be met, the student managers try to do so. During summer orientation the students have a chance to meet managers through a job fair, during that time if a supervisor is still seeking a student, they can attend and meet new students. The supervisor preference goes to the manager for the placement process. Ultimately mid-summer the managers sit down and place all incoming new and transfer students.

In general, how are work assignments determined for upper-class students?

Returning students are given the opportunity to keep the job they are in (with supervisor approval) or apply for other open positions around campus before the allocation process and this can be approved or denied by the corresponding manager. Depending on the position, the application packets might require a student to submit a resume. When we talk about the request of the supervisor, the request comes through the hiring process, not just a verbal request and then a student is moved.

How Schools Address Job Assignments, Hours Worked, Summer Work, etc. (cont.)

	Kuyper College	Paul Quinn College	Sterling College	Warren Wilson College
Do you allow students to have more than one work assignment or position on campus?	Yes	No	No	No
Do you allow students to have additional off-campus jobs outside of the required work assignment?	Yes	Yes	Yes	Yes
What percentage of students have a work assignment on campus?	100%	72% on campus Work Program	100%	92%
What percentage of students have a work assignment off campus?	0%	28% Corporate Work Program	0%	3-5%

How Schools Address Job Assignments, Hours Worked, Summer Work, etc. (cont.)

	Kuyper College	Paul Quinn College	Sterling College	Warren Wilson College
In general, how are work assignments determined for first-year students?	First-year students fill out a form where they can identify any previous experience that they believe may be helpful in the selection process. We have several opportunities for students to interview during our on-campus admitted student days, though it is not required. First-year placements are determined by a combination of this information.	<p>*Student Interest Survey *Resume *Previous Work Experience *Student Request *Requested by Supervisor</p> <p>The Farm, Cafeteria and Facilities need the greatest number of students. Following those departments, students are spread evenly based on even coverage.</p>	*Student Interest Survey	Hiring process – student views open positions, applies to one or more open positions, submits resume if they have one, supervisor reviews candidates and then offers or rejects applicant. WPO facilitates all communication and paperwork. At a designated date late in the summer, all students that have not applied or been selected are asked to fill out a student interest survey and WPO staff places remainder according to interest / experience and staffing needs.
In general, how are work assignments determined for upper-class students?	Returning students go through a full hiring process including an application, submission of a resume, and an interview. Students are then offered a position(s). They may accept only one position, even if offered multiple positions. Additional positions may be considered once all interviewed students have been hired.	<p>*Student Interest Survey *Resume *Previous Work Experience *Student Request *Requested by Supervisor</p> <p>The model works best when upper-class students shift into more demanding roles both on-campus and eventually off-campus with corporate partners.</p>	*Application	Students have the option to remain on their current crew -or- Hiring process – Students shadow/ volunteer on crews they are interested in joining during the Fall and Spring semesters. They will then apply to one or more open positions, submit resume, supervisor reviews candidates and then offers or rejects applicant. WPO facilitates all communication and paperwork.
Are students allowed to change work assignments during the academic year?	Yes	Yes	Yes	Yes

How Schools Address Job Assignments, Hours Worked, Summer Work, etc. (cont.)

	Kuyper College	Paul Quinn College	Sterling College	Warren Wilson College
If students are allowed to change work assignments, when and under what circumstances?	It would typically be the result of either an unexpected vacancy in another area, health or ability concerns related to the current position, and in some cases fit with the supervisor (when mediation does not resolve issues).	We like to keep students in their work assignments for the entire year. However, we do understand that the assignment may not be the right fit or there may be extenuating circumstances. If so, the student must submit a request to the Work Program Office and explain the challenges or reasons for the request.	If there is a bad fit and student brings the issue to the Work Supervisor or Associate Dean	Students can apply for any open positions between Fall and Spring semesters during the designated hiring periods.
How many hours are students required to work each week?	Varies	On-campus: 12-15 hours Corporate: 16-20 hours	No requirement	8, 12, 16
How many hours are students required to work each semester?	Choice of 150, 225 or 300	On-campus: 150 hours Corporate: 200 hours	80 hours minimum	120, 180, 240
Do all students work the same number of hours?	No	No	No	No
Is there a range (or variability) in the number of hours student work?	Yes. Students may choose to work 150, 225 or 300 hours per semester.	Yes. There is variation between on-campus work and corporate work.	Yes. Level 2 and Level 3 students can work up to 120 hours per semester	Yes. All students work on a designated 120-hour contract, unless they have been hired for a leadership position on their crew, which is 240 hours per semester.
How do you track student hours?	Electronic time keeping system	Electronic time keeping system and manual recording	Manual Recording and Timecards. Students record their hours on their crew timesheet and Work Supervisors submit paper timesheets to the Associate Dean, who enters data into a database.	Electronic time keeping system
What actions are taken if a student does not work the assigned number of hours?	There are two options. First, the student is required to pay back the hours to the institution. Second, the student may roll over hours from fall to spring (typically not more than two weeks' worth). Students are not able to roll over hours from spring to fall.	We have a warning system in place to walk the students through the learning of meeting expectations and/or finding out what challenges are being faced. We take a collaborative approach with the students to make this a learning opportunity and help them in understanding that the hours missed will have to be made up.	The student goes on work-review and does not earn the full tuition credit.	Students that end the semester more than 2 weeks undertime will be placed on Undertime Work Probation unless circumstances dictate otherwise (illness, etc). This prohibits their participation on extra-curricular, sports, study away, etc. Students may be fiscally responsible for any unworked hours.

How Schools Address Job Assignments, Hours Worked, Summer Work, etc. (cont.)

	Kuyper College	Paul Quinn College	Sterling College	Warren Wilson College
What happens if a student works more than the assigned number of hours	The student is compensated for their time or their time for the spring semester (if the overage occurs in the fall) is adjusted.	We discuss their workload with both student and partner. If they are over the set amount agreed upon in the contract, the employer/partner will pay the student directly for their work. Students in the on-campus work program must stop working once they have exceeded the assigned maximum hours. When classes are in session, on-campus work program students may not work over 20 hours per week.	The student will receive an hours credit toward the next semester.	They are informed of the error and their work award for the following semester in the case of overtime in Fall will be reduced by the overtime amount
Approximately, what percentage of students work during the summer?	10%	5%	15%	15%
Is summer work considered a part of the work-learning-service program or educational program (e.g., evaluation, supervision)?	No	No	Yes and No	No
Are students required to take classes during the summer in order to work?	No	No	Yes and No	No
How many hours do students typically work during the summer?	20-40 hours per week	It varies, but no more than 20 hours/week if taking classes.	7-20 hours per week, depending on position**	20-40 hours per week
Do you have students working over semester breaks?	Yes	Yes	Yes	Yes
If so, approximately what percentage of students work over breaks?	It varies	5%	5-10%	It varies
Is "break work" considered part of the work-learning-service program or educational program (e.g., evaluation, supervision)?	Yes	No	No	Yes
Do you provide workers compensation to students?	Yes	Yes	No	Yes

**** Note for Sterling College:** During the summer, almost all student work is on the farm. We have summer associates which are not part of the work program and work 20 hours per week and then we also sometimes have work program students who are enrolled full-time in the summer agricultural program. It has not been consistent.

Record of Work Performance

Regulation requires a record of work performance as part of the student's college record. While there is no regulatory requirement for an "official" work transcript or certificate, several schools do provide students with a transcript or certificate that demonstrates student accomplishments, work performed, skills gained, and supports the goals of the work program. It also provides employers with a snapshot of student ability and attainment.

(b) Comprehensive student work-learning-service program: A student work-learning-service program that—

(3) Includes learning objectives, evaluation, and a record of work performance as part of the student's college record; (Authority: 42 U.S.C. 2756b)

Record of Work Performance and Evaluation					
	Alice Lloyd College	Berea College	Bethany Global University	Blackburn College	College of the Ozarks
Do students receive a work transcript or certificate upon graduation?	Yes	Yes	No	Yes	Yes
If so, is a work grade included on the transcript?	No	No	N/A	Yes	Yes
If so, is work history included on the transcript?	No	Yes	N/A	Yes	No
Comments			Students do not receive a work specific transcript. However, work does appear on the regular college transcript with a grade for work.	At the end of the students' college career, they are provided with a work transcript that grades them on each competency.	
How do you evaluate student work?	*Paper evaluation *Student / supervisor meeting	*Student / supervisor meeting *Online evaluation	*Paper evaluation *Student / supervisor meeting	*Paper evaluation *Student / supervisor meeting	*Student / Supervisor Meeting *Online Evaluation
How often is student work evaluated?	Once each semester	Once each semester	Once each semester	Once each semester	Twice each semester
If a student receives a poor evaluation, what are the next steps?	Warning	Warning Probation	Probation		Probation
Do students have an opportunity to evaluate the supervisor?	Yes	Yes	Yes	No	Yes

Record of Work Performance and Evaluation					
	Alice Lloyd College	Berea College	Bethany Global University	Blackburn College	College of the Ozarks
Do students have an opportunity to evaluate the work program?	Yes	Yes	Yes	Yes	Yes
Comments				If a student receives poor performance evaluations, there are no specific outlined plans to improve the student's performance. But if they receive bad grades their first two years, they have the opportunity to improve their grades the next two years.	

Record of Work Performance and Evaluation (cont.)				
	Kuyper College	Paul Quinn College	Sterling College	Warren Wilson College
Do students receive a work transcript or certificate upon graduation?	Yes	Yes	No	No
If so, is a work grade included on the transcript?	No	Yes	N/A	N/A
If so, is work history included on the transcript?	Yes	Yes	N/A	Yes
Comments	We are working to integrate the work transcript with badging and micro-credentialing that can then be brought into a student's portfolio.		Passing the Work Program with a satisfactory grade is recorded on the academic transcript each semester.	Work Transcripts are available upon request.
How do you evaluate student work?	*Student/ Supervisor Meeting *Online Evaluation	*Online Evaluation	*Student / Supervisor Meeting *Online Evaluation	*Student / Supervisor Meeting *Online Evaluation

Record of Work Performance and Evaluation (cont.)				
	Kuyper College	Paul Quinn College	Sterling College	Warren Wilson College
How often is student work evaluated?	Once each semester	Once each semester	Twice each semester	Once each semester
If a student receives a poor evaluation, what are the next steps?	Warning*	Warning Probation**	Probation	Warning
Do students have an opportunity to evaluate the supervisor?	Yes	Yes	Yes	Yes
Do students have an opportunity to evaluate the work program?	Yes	Yes	Yes	Yes

**Kuyper College: A warning is provided and the student works with the supervisor and the Dean of Work on a learning development plan.*
***Paul Quinn College: We have a warning system in place: (1) Verbal Warning (2) Written Warning (3) Probation (4) Suspension*



Student and Program Evaluation

Student evaluation and program evaluation is an important part of the Work Colleges comprehensive work-learning-service program. As stated in regulation, a Work Colleges program **must** “include learning objectives, evaluation, and a record of work performance as part of the student’s college record.” In order for work to be an integral part of the educational program it should be treated with the same dedication and intention as the academic program. As stated in regulation, the consequences for nonperformance or failure in the work-learning-service program should be similar to an academic program. Work Colleges can best decide for themselves how to evaluate their programs to help meet both student and institutional need.

Includes learning objectives, evaluation, and a record of work performance as part of the student’s college record. (Authority: 42 U.S.C. 2756b)

Includes consequences for nonperformance or failure in the work-learning-service program similar to the consequences for failure in the regular academic program.

(Authority: 42 U.S.C. 2756b)



Service at Work Colleges

Definition of Service at Work Colleges

It is important to note that one of the purposes of the Work Colleges Program is to encourage students to participate in community service activities. Also, under the Work Colleges Program a school may use program funds to administer and develop community-based work-learning-service alternatives that expand opportunities for community service. In addition, a school may use those funds to promote the work-learning-service experience as a tool for community service-learning opportunities.

In 2009 the following definition for service was added to the preamble of the work colleges statute and regulatory guidelines: ***refers to uncompensated volunteer service or compensated service for work performed for the good of the college community or the external community beyond the campus. It includes work performed in the public interest at a Federal, State, or local public agency, or at a private nonprofit service organization. (2009 Preamble)***

It is important to note that when students work as part of a community, they come to understand their role in helping their community. Students learn to care for one another, their coworkers, and their surroundings. They understand that they all play a part in helping to sustain their community - making sure it operates efficiently, safely, and successfully - working together for the good of the college community.

- ➔ Student workers **must** be informed of the opportunity to perform community services. **FWS 675.8(f)**
- ➔ A Work College **must** use at least 7 percent of its FWS award to employ students in community service positions which **must** include a literacy position where at least one student worker is employed as a reading tutor for preschool or elementary school children. FWS675.18(g)-(i)-(ii) This regulation does not apply to the Work Colleges allocation. Though, if a school transfers a portion or all its FWS allocation into the Work Colleges Program, it **must** still meet the requirements above.
- ➔ A Work College **may** pay students a reasonable amount of time spent for travel related to employment in community service activities including tutoring in reading and family literacy activities. 675.18(h)(2) Schools **should** provide their students with a form on which students can record time separately from time spent working. Federal Work-Study Programs Handbook – section Payment for FWS Training and Travel.

Service at Work Colleges					
	Alice Lloyd College	Berea College	Bethany Global University	Blackburn College	College of the Ozarks
Based on the regulatory definition, how is service thought about on your campus?	*External service to a greater community *Service to the campus community	*External service to a greater community *Service to the campus community	*External service to a greater community *Service to the campus community	*External service to a greater community *Service to the campus community	*External service to a greater community *Service to the campus community
In what types of service activities are students engaged?	Food drives, fundraisers for cancer, reading tutors, math tutors, and Christmas program	Working with nonprofit organizations and the local school system to fulfill needs such as office duties, tutoring and many more. On campus service involves students raising awareness about social justice issues and mentoring other students.	Literacy training in the Montessori program	Daily operational activities of the campus life. Students in Community Services provide labor for not-for-profit agencies in the Carlinville community. The volunteer hours for managers can be in town or on campus, and some choose to provide extra labor in the cornerstone departments (dining, campus services, etc.) or with an organization / event in town (Feeding Our Neighbor dinner service, Macoupin Animal Shelter, or the Children's Christmas Spree).	The College offers various opportunities to serve both the campus and community. For example, a summer camp for underprivileged children in the local community is operated by the College and student workers.
Is there a service requirement for graduation?	No	Yes	Yes	No	
Additional Information about service on each campus	Service is a requirement for students in the College Leadership Program			The student managers are required to perform 10 hours of volunteer work each semester for either the campus community or external community.	

Service at Work Colleges				
	Kuyper College	Paul Quinn College	Sterling College	Warren Wilson College
Based on the regulatory definition, how is service thought about on your campus?	*External service to a greater community *Service to the campus community	*External service to a greater community *Service to the campus community (see below)	*External service to a greater community *Service to the campus community	*External service to a greater community
In what types of service activities are students engaged?		Community volunteers work with Earth X, both Earth Day activities and Dallas area community gardens supported by Earth X. The local elementary school also permits Paul Quinn Work Program students to visit their campus and read to and tutor students. Except for the outdoor community garden activities, all have been negatively impacted by Covid-19.	Service to community through farm and kitchen chores. Some students are on crews that provide direct community service to community partners and non-profit organizations. All students participate in All College Work Day.	Work with a variety of community partners around the following issue areas: the environment, food security, housing and homelessness, race and immigration, and youth and education.
Is there a service requirement for graduation?	No	No	No	Yes
Additional Information about service on each campus	There is not a stand alone service requirement, but each program requires an internship.			

**Paul Quinn College and the definition of community service on campus: There are "all hands on deck" service opportunities on campus which Work Program students have the opportunity to serve. These include commencement, campus clean-ups, post-construction cleaning, furniture moving, and community events. When the College receives invitations for student volunteers, we look first to on-campus work program students. For example, Paul Quinn Work Program students volunteer for Earth Day events and community garden clean up days. New this year is a focus on four buckets in the Work Program learning lexicon: Knowledge Building, Skill Building, Social Emotional Work, and Corporate Social Responsibility. We want to make sure our students understand the value of giving back and self-care, in addition to the more traditional knowledge and skill growth.*

Program Oversight, Supervisors and Training

- ➔ Work Program Oversight and School Examples
- ➔ Work Program Supervisors and Training
- ➔ Administration of FWS
- ➔ Fair Labor Standards Act (FLSA)
- ➔ Job Location Development
- ➔ I-9 US Department of Homeland Security
- ➔ Family Educational Rights and Privacy Act (FERPA)

S.6

PROGRAM OVERSIGHT, SUPERVISORS AND TRAINING

(b) Comprehensive student work-learning-service program: A student work-learning-service program that—

(4) Provides programmatic leadership by college personnel at levels comparable to traditional academic programs;

(5) Recognizes the educational role of work-learning-service supervisors; (Authority: 42 U.S.C. 2756b)

Operating a student work program is complex. Regulation calls for a parallel structure to an academic program along with program oversight. Students **must** fulfill their work assignments, training needs to take place, work **must** be carried out on campus or at an alternate place of employment, hours need to be tracked, work evaluations are critical for helping to inform the program and support students, conflicts arise that need to be resolved and there is a lot of learning to be done. The “dean of work” oversees all the components of a robust structured work program where work and learning never stop.



Work Program Oversight

Work Program Oversight					
	Alice Lloyd College	Berea College	Bethany Global University	Blackburn College	College of the Ozarks
What title is used on your campus for the individual overseeing the Work Program?	Dean of Student Work	Dean of Labor	Dean of Work Education & Operations	Dean of Work	Dean of Work Education
What are the primary responsibilities of the Dean of Work?	*Total oversight of the work program *Work assignments for students *Allocate work assignments across campus/ departments *Conflict resolution *Oversee student evaluation *Supervisor training *Oversee / Track student hours *Oversee student payroll	*Total oversight of the work program *Allocate work assignments across campus/ departments *Consequences for student non-performance	*Total oversight of the work program *Conflict resolution *Supervisor training	*Total oversight of the work program *Conflict resolution *Oversee student evaluation *Supervisor training *Consequences for student non-performance	*Total oversight of the work program *Oversee Work assignments for students *Allocate work assignments across campus/ departments *Conflict resolution *Oversee student evaluation *Supervisor training *Oversee / Track student hours *Consequences for student non-performance
To whom does the Dean of Work report?	Academic Dean	President	President	President	Chief Operating Officer
Under which area(s) is the Dean of Work and Work Program housed?	Academics	The Labor Program is a stand-alone program	BGU Administration	The Work Program is independent of other areas	Vocational Program
Does your department evaluate and assess the overall work program on a regular basis?	Yes	Yes	Yes	Yes	Yes
If your department evaluates and assesses the work program, please explain.			A survey (The Vibe) is administered every 8 weeks to evaluate the Practical Training Program, supervisors, and Practical Training Development.	Student assessment of the program each semester. Those findings are used to inform training areas for the following semester / year.	
Additional information about the Dean of Work and Work Program.			The Practical Training Program supervisor handles the day-to-day operations of the work program while the Dean handles issues with the WCC or any issues that need to be escalated.		

Work Program Oversight (cont.)

	Kuyper College	Paul Quinn College	Sterling College	Warren Wilson College
What title is used on your campus for the individual overseeing the Work Program?	Dean of Students and Work	Director, Work Program	Associate Dean of Work-Learning	Associate Dean of Work
What are the primary responsibilities of the Dean of Work?	<ul style="list-style-type: none"> *Total oversight of the work program *Work assignments for students *Allocate work assignments across campus/ departments *Conflict resolution *Oversee student evaluation *Supervisor training *Oversee / Track student hours *Consequences for student non-performance 	<ul style="list-style-type: none"> *Total oversight of the work program *Allocate work assignments across campus/ departments *Conflict resolution *Oversee student evaluation *Consequences for student non-performance *Oversee Student Payroll 	<ul style="list-style-type: none"> *Total oversight of the work program *Work assignments for students *Allocate work assignments across campus/ departments *Conflict resolution *Oversee student evaluation *Supervisor training *Oversee / Track student hours *Consequences for student non-performance 	<ul style="list-style-type: none"> *Total oversight of the work program *Conflict resolution *Oversee student evaluation *Supervisor training
To whom does the Dean of Work report?	President	Chief Administrative Officer	Dean of Academics	
Under which area(s) is the Dean of Work and Work Program housed?	They exist under their own area	Institutional Programs	Academics	The Center for Experiential Learning
Does your department evaluate and assess the overall work program on a regular basis?	Yes	Yes	Yes	Yes
If your department evaluates and assesses the work program, please explain.	Our program is new, so additional assessments are currently being done. The program will have yearly evaluations through a rotation of surveys one year and focus groups the next year. The program is also on rotation with academic programs for a deep program review on a regular basis.	Supervisor and participant feedback are collected yearly.	Bi-Weekly meetings and yearly evaluations	

Work Program Supervisors and Training

(b) Comprehensive student work-learning-service program: A student work-learning-service program that—

(5) Recognizes the educational role of work-learning-service supervisors

(Authority: 42 U.S.C. 2756b)

At Work Colleges faculty and staff become part of the team that helps to supervise student work on campus. Supervisors work with students on a regular basis. They make sure work is getting done, needs are being met and that students are fulfilling their work responsibilities.

There **must** be support and training for all supervisors as well as students. Training is a key component to ensure the safety and well-being of employees. In addition, it helps to ensure that needed and necessary work is getting done across campus in a timely and efficient manner. Training can take many different forms, from large overview group trainings to department trainings, team training, individual training, self-training modules etc. No matter how trainings take place they **must** be regarded as an essential element of running a “comprehensive work-learning-service” program. Both student workers and supervisors should feel supported and know their points of contact and have clear understanding of their job responsibilities and expectations.

Work Program Supervisors and Training					
	Alice Lloyd College	Berea College	Bethany Global University	Blackburn College	College of the Ozarks
Who serves as a work supervisor on your campus?	Faculty Staff Student Managers	Faculty Staff	Faculty Staff	Faculty Staff Student Managers*	Faculty Staff
Do supervisors meet with students on a regular basis?	Yes	Yes	Yes	Yes	Yes
How often do supervisors meet with students?	Daily Weekly Bi-Weekly Monthly	Bi-Weekly Monthly	Daily Weekly	Daily Weekly Bi-Weekly Monthly	Daily
Do you provide supervisor training?	Yes	Yes	Yes	Yes	Yes
How often do you provide supervisor training?	Once each academic year	Each semester Ongoing basis	Ongoing basis	Upon entry to the institution and during monthly faculty and staff assemblies	Ongoing basis

Work Program Supervisors and Training					
	Alice Lloyd College	Berea College	Bethany Global University	Blackburn College	College of the Ozarks
Do you provide workplace trainings for students?	Yes	Yes	Yes	Yes**	Yes
Which trainings do you provide for students?	*OSHA Training *Material Safety Data Sheets *FERPA	Supervisors provide trainings for their work areas	*OSHA Training *Material Safety Data Sheets *Sexual Harassment *Title IX *FERPA	*OSHA Training *Material Safety Data Sheets *Sexual Harassment *Title IX *FERPA *Mandated Reporter Training	*OSHA Training *Material Safety Data Sheets *Sexual Harassment *Title IX *FERPA

**At Blackburn College, members of the local community supervise students in the Community Services Department.*

***At Blackburn College, the workplace trainings are provided by Managers and General Managers.*

Work Program Supervisors and Training (cont.)				
	Kuyper College	Paul Quinn College	Sterling College	Warren Wilson College
Who serves as a work supervisor on your campus?	Faculty Staff Student Managers*	Faculty Staff Student Managers	Faculty Staff	Faculty Staff
Do supervisors meet with students on a regular basis?	Yes	Yes	Yes	Yes
How often do supervisors meet with students?	While it varies in regard to formalized meetings, supervisors typically meet and connect with students most days that they are working.	While it varies in regard to formalized meetings, supervisors typically meet and connect with students most days that they are working.	Weekly	It varies based on the supervisor – “formal” meetings can take place weekly, twice each semester, or during evaluations.
Do you provide supervisor training?	Yes	Yes	Yes	Yes
How often do you provide supervisor training?	On an ongoing basis. This is a process that we are continuing to develop.	Once each academic year**	Once each semester	Once each semester Ongoing basis*
Do you provide workplace trainings for students?	Yes	Yes	Yes	Yes

Work Program Supervisors and Training (cont.)

	Kuyper College	Paul Quinn College	Sterling College	Warren Wilson College
Which trainings do you provide for students?	*OSHA Training *Material Safety Data Sheets *Sexual Harassment *Title IX *FERPA	*OSHA Training *Material Safety Data Sheets *Sexual Harassment *Title IX *FERPA	*Sexual Harassment *Title IX *FERPA *Blood Borne Pathogens	*OSHA Training *Material Safety Data Sheets *Sexual Harassment *Title IX *FERPA

***Kuyper College:** While student managers may provide oversight, student managers do not complete the formal evaluation. However, they may provide insight to the supervisor in regard to their perspective.

****Paul Quinn College:** We are looking to implement additional training opportunities for our on-campus supervisors and have created a Partner Advisory Panel for our Corporate Partners.

Paul Quinn College created a training program called P.L.E.X. (Preparing Leaders for Excellence) and is working to educate students out of 4 buckets: Knowledge Building; Skill Building; Social Emotional Learning; Corporate Social Responsibility

Paul Quinn College helps the students complete the 4 E's during their internship opportunities: Exposure; Experience; Engagement; Encouragement

*****Warren Wilson College:** The Work Program Office provides mandatory Supervisor retreats and trainings at the beginning of each semester with periodic optional trainings ("Supervisor Development Sessions") hosted throughout the semester.



Federal Work-Study Administration

Federal Work-Study provides much of the operational underlayment for the Work Colleges Program. A college cannot simply implement the Work Colleges Program and ignore or side-step Federal Work-Study. As previously noted, the Work Colleges Program has additional requirements for the program on top of federal work-study. The Work Colleges Program provides a bit more latitude for the colleges in the application /utilization of federal funds which can be found in regulation under Allowable costs. However, as in any employment situation where federal funds are being used for students - the individual students **must** be eligible to receive federal funding. And all applicable FWS and labor laws **must** be followed. Therefore, it is important that there is a person or persons responsible for compliance and understanding the proper application and utilization of funds.

Federal Work-Study Administration					
	Alice Lloyd College	Berea College	Bethany Global University	Blackburn College	College of the Ozarks
Who is responsible for overseeing and administering Federal Work-Study on your campus?	Dean of Work Financial Aid Director	Financial Aid Director	Financial Aid Director	Financial Aid Director	Financial Aid Director
Who is responsible for overseeing and administering the Work Program on your campus?	Dean of Work Financial Aid Director	Dean of Labor	Dean of Work	Dean of Work	Associate Dean of Work

Federal Work-Study Administration (cont.)				
	Kuyper College	Paul Quinn College	Sterling College	Warren Wilson College
Who is responsible for overseeing and administering Federal Work-Study on your campus?	Financial Aid Director	Financial Aid Director	Dean of Work Financial Aid Director	Financial Aid Director
Who is responsible for overseeing and administering the Work Program on your campus?	Dean of Students and Work	Director of Work Program	Dean of Work	Associate Dean of Work

Fair Labor Standards Act (FLSA)

In addition to the federal work-study regulations and the federal regulations for Work Colleges, any institution operating a student work program needs to be keenly aware of the following items as they apply to student work:

The Fair Labor Standard Act (FLSA) is a federal law that sets minimum wage, overtime, and minimum age requirements for employers and employees. (29 USC 201 et al) Many states have enacted their own labor standards laws, some of which have higher minimum wage rates, more stringent overtime rules, and different child labor requirements with which employers must also comply. (29 CFR 541.4) The Fair Labor Standards Act also provides guidance on recordkeeping, and youth employment standards affecting employees in the private sector and in Federal, State, and local governments. <https://www.dol.gov/agencies/whd/compliance-assistance/handy-reference-guide-flsa>

More information can be found at the Department of Labor:

<https://www.dol.gov/>

Key Features of the Fair Labor Standards Act:

- ➔ Employers **must** display an official poster outlining the requirements of the FLSA.
- ➔ Employers **must** keep employee time and pay records.
- ➔ Student work payments **must** meet the requirements of the state or local law. This means that when the state or local law requires a higher minimum wage than federal, the school **must** pay the student worker the higher wage. The Fair Labor Standards Act (FLSA) is very strict in requiring employers to pay non-exempt employees for all hours worked. This may include requiring an employer to pay an employee for time worked while on a bona fide meal or lunch break, even if the break is supposed to be unpaid. 29 CFR 785.19
- ➔ Bona fide meal periods are not worktime. Bona fide meal periods do not include coffee breaks or time for snacks. These are rest periods. The employee **must** be completely relieved from duty for the purposes of eating regular meals. Ordinarily 30 minutes or more is long enough for a bona fide meal period. A shorter period may be long enough under special conditions. The employee is not relieved if he is required to perform any duties, whether active or inactive, while eating. For example, an office employee who is required to eat at his desk or a factory worker who is required to be at his machine is working while eating. 29 CFR 785.19
- ➔ The Fair Labor Standards Act (FLSA) requires employers to pay non-exempt employees for all hours worked. This may include requiring an employer to pay an employee for time worked while on a bona fide meal or lunch break, even if the break is supposed to be unpaid.
- ➔ Federal law does not currently require employers to provide meal, lunch, or break periods

for their employees. However, state meal, lunch, and break requirements vary from state to state and cover the spectrum of limitations. Some states do not have any meal or break requirements, or only have meal or break requirements for minors, or only provide for meal or break periods in certain situations. When state law is silent regarding meals and breaks, federal law applies.

- ➔ Rest periods of short duration, running from 5 minutes to about 20 minutes, are common in industry. They promote the efficiency of the employee and are customarily paid for as working time. They **must** be counted as hours worked. Compensable time of rest periods may not be offset against other working time such as compensable waiting time or on-call time.
- ➔ The FLSA requires employers to provide reasonable break time for a nursing mother employee who is subject to the FLSA's overtime requirements for the employee to express breast milk for her nursing child for one year after the child's birth each time such employee has a need to express breast milk. Employers are also required to provide a place, other than a bathroom, that is shielded from view and free from intrusion from coworkers and the public, which may be used by the employee to express breast milk.
- ➔ Under the FLSA, there are no limits to the number of hours an employer may require an employee to work in one workday or one workweek. However, employers are required to pay employees an overtime rate of one and a half times their regular rate for all hours worked in a workweek in excess of 40, (unless the employee is otherwise exempt from the FLSA's overtime requirements) Conversely, as long as a non-exempt employee does not work more than 40 hours in a workweek, an employer is not required to pay overtime even if the employee works more than eight hours in one day or whether the employee works on a holiday, a Saturday, or a Sunday.
- ➔ Certain full-time students, student learners, apprentices, and workers with disabilities may be paid less than the minimum wage under special certificates issued by the Department of Labor. 29 CFR 519 – Employment of Full-Time Students at Subminimum wages
- ➔ The FLSA establishes several recordkeeping requirements that **must** be adhered to by all employers covered by the law. While the method of recordkeeping is not mandated and time clocks are not required, employers are required to keep an accurate record of hours worked, wages paid, and other information for all employees. The information required to be kept on covered employees includes:
 - Personal information, including employee's name, home address, occupation, sex, and birth date if under 19 years of age;
 - Hour and day when workweek begins;
 - Total hours worked each workday and each workweek;
 - Total daily or weekly straight-time earnings;

- ⦿ Regular hourly pay rate for any week when overtime is worked;
 - ⦿ Total overtime pay for the workweek;
 - ⦿ Deductions from or additions to wages;
 - ⦿ Total wages paid each pay period; and
 - ⦿ Date of payment and pay period covered.
- ➔ The US Department of Labor has authority to recover back wages and an equal amount in liquidated damages in instances of minimum wage, overtime, and other violations. The Department may litigate and/or recommend criminal prosecution. Employers may be assessed civil money penalties for each willful or repeated violation of the minimum wage or overtime pay provisions of the law. Civil money penalties may also be assessed for violations of the FLSA's child labor provisions. Heightened civil money penalties may be assessed for each child labor violation that results in the death or serious injury of any minor employee, and such assessments may be doubled when the violations are determined to be willful or repeated. The law also prohibits retaliating against or discharging workers who file a complaint or participate in any proceeding under the FLSA

Job Location and Development (JLD) Funds Can be Utilized for Work Colleges

A Work College, if they so desire, can implement a Job Location and Development Program

The purpose of JLD is to expand off-campus job opportunities regardless of their financial need and to encourage students to participate in community service activities. 675.31

An institution may expend not more than 10% or \$75,000 of FWS or WCP allocation and reallocation for an award year to establish or expand a JLD Program. The institution can operate a separate program or a program in combination with other eligible institutions. 675.32

JLD allows use of up to \$75,000 of FWS to support 80 percent of JLD allowable costs. Allowable costs include staff salaries/benefits, travel expenses, printing and mailing costs for brochures, telephone charges, supplies, equipment, furniture, JLD advertising, and workshops. The institution **must** demonstrate a 20 percent match through cash or JLD related services. 675.33(a)(1)-(2)-(3)-(4)

JLD allows use of up to \$75,000 of WCP to support 50 percent of JLD allowable costs. Allowable costs can include staff salaries/benefits, travel expenses, printing and mailing costs for brochures, telephone charges, supplies, equipment, furniture, JLD advertising, and workshops. The institution **must** demonstrate a 50 percent match through cash or JLD related services. 675.33(a)(1)-(2)-(3)-(4) & 675.45(a)(3) (WCP allowable costs includes activities under HEA 446 which is JLD)

An FWS and/or WCP institution may enter into a written agreement with other eligible institutions

to establish and operate JLD programs for its students. The agreement should include the designate administrator of the program and specify the terms, conditions, and performance standards of the program. However, each institution shall retain responsibility for the proper distribution of the FWS or WCP funds it contributes under an agreement. 675.34(a) –(b)(1)-(2)-(3) & (c)

The institution under JLD **must** meet all the Fiscal and procedures and records requirements under FWS 675.19. 675.36

I-9 for Student Employment

US Department of Homeland Security, Citizenship, and Immigration Services

[Immigration Reform and Control Act of 1986 \(IRCA\)](#)

Form I-9 is used for verifying the identity and employment authorization of individuals hired for employment in the United States. All U.S. employers **must** ensure proper completion of Form I-9 for everyone they hire for employment in the United States. This includes citizens and noncitizens.

Family Educational Rights and Privacy Act (FERPA)

Federal law that protects the privacy of student education records. The law applies to all schools that receive funds under an applicable program of the U.S. Department of Education. FERPA gives parents certain rights with respect to their children's education records. These rights transfer to the student when he or she reaches the age of 18 or attends a school beyond the high school level.





**Volunteering at the
Capital Area Food Bank**



Becoming a Federally Approved Work College

- ➔ Instructions for New Applicants
- ➔ Information About Participation in the Work Colleges Program
- ➔ U.S. Department of Education Application and Agreement to Participate in the Work Colleges Program

S.7

APPLICATION TO BECOME A FEDERALLY APPROVED WORK COLLEGE

- ➔ Interested schools apply directly to the U.S Department of Education.
- ➔ Schools **must** provide thorough documentation that supports the regulatory criteria required of an active “comprehensive work-learning-service program.”
- ➔ Schools **must** substantiate that a “comprehensive work-learning-service program” has been operating on their campus for a minimum of two years.
- ➔ We strongly suggest that schools have work program information readily available on their website for students, faculty, and staff; including but not limited to your campus work program goals /philosophy, work program policies and procedures, a student work handbook, job descriptions, pay schedule, training resources, etc.

Instructions for the “Institutional Application and Agreement to Participate in the Work Colleges Program” for the 2023-24 Award Year

EXAMPLE

Application can be accessed via the U.S. Department of Education
Common Origination & Disbursement (COD) web site

Submission Deadline

Beginning with the 2023-24 application year, separate deadlines and mailing instructions apply to new/first-time applicants to the Work Colleges program and returning applicants (those previously approved by the Department to participate in the Work Colleges program).

You must submit a completed “Institutional Application and Agreement to Participate in the Work Colleges Program” for the 2023-24 Award Year to the U.S. Department of Education (the Department) by the applicable deadline:

<u>New Applicants:</u>	November 1, 2022
<u>Returning Applicants:</u>	March 6, 2023

Review Requirements

It is important that you read the “Institutional Application and Agreement to Participate in the Work Colleges Program” for the 2023-24 Award Year thoroughly before completing and submitting it to the Department. Whether your school currently participates in the program or is submitting an initial application, please review all the requirements under the Work Colleges Program as indicated in Section 448 of the Higher Education Act of 1965, as amended, and the applicable regulations (CFR Part 675, Subpart C) to ensure that your school is eligible before requesting an allocation for the 2023-24 Award Year.

Submit Application Electronically

You must transmit your application electronically. To access the application, login to the Common Origination and Disbursement (COD) Web Site at <https://cod.ed.gov>. From the ‘School’ tab, select ‘Campus-Based’ from the left navigation menu, then select ‘Forms and Waivers’ from the menu on the Campus-Based homepage.

Sign the Mail the Report

The CEO must provide an original signature on the printed form. It must be mailed or hand delivered. Upon completing the report, click the link to ‘Download Form/Signature Page’ from the ‘Forms and Waivers’ page to obtain the hard copy of the completed report/signature page. *Refer to the mailing instructions below that are applicable to your school.*

New Applicants: The printed and signed copy of the application and all required documentation (see instructions below) must be postmarked by November 1, 2022. If you mail the application through the U.S. Postal Service, it must be sent to the following address:

United States Department of Education
Federal Student Aid
Grants & Campus-Based Division
Work Colleges Program
830 First Street, NE, Rm 63C2
Washington, DC 20202-5453

If the application is hand delivered by commercial courier, use the same address except the zip code is 20002. The application must be delivered by 4:30 p.m. (ET) on March 6, 2023.

Returning Applicants: The printed and signed copy of the application must be postmarked by March 6, 2023 and mailed to:

U.S. Department of Education
P.O. Box 1130
Fairfax, VA 22038

For overnight delivery, mail to:

U.S. Department of Education
4050 Legato Road #1100
Fairfax, VA 22033

Instructions for New Applicants 2023

If your school is **not currently participating** in the Work Colleges Program, you are considered a **new** applicant. As a new applicant, you **must** also submit documentation in addition to your electronically transmitted application and your CEO's original signature on the printed form by November 1, 2023, deadline. Your documentation and the printed application with original signature **must** be sent directly to the address above.

You **must** submit any documentation that will verify that your school meets the specific requirements for the Work Colleges Program. Although you **must** meet all of the general requirements, your documentation **must** specifically show that your school **(1)** is a public or private nonprofit, four-year, degree-granting institution with a commitment to community service, **(2)** has operated a comprehensive work-learning-service program for at least *two* years, **(3)** requires students, including at least one-half of all students who are enrolled on a full-time basis, to participate in a comprehensive work-learning-service program for at least five hours each week, or at least 80 hours during each period of enrollment, except summer school, unless the student is in an approved study abroad or externship program, and **(4)** provides students participating in the comprehensive work-learning-service program with the opportunity to contribute to their education and to the welfare of the community as a whole.

Your documentation **must** also demonstrate that the comprehensive work-learning-service program at your school **(1)** is an integral and stated part of the school's educational philosophy and program, **(2)** requires participation of all resident students for enrollment and graduation, **(3)** includes learning objectives, evaluation, and a record of work performance as part of each student's college record, **(4)** provides programmatic leadership by college personnel at levels comparable to traditional academic programs, **(5)** recognizes the educational role of work-learning-service supervisors, and **(6)** includes consequences for non-performance or failure in the work-learning-service program similar to the consequences for failure in the regular academic program.

Some examples of acceptable documentation are:

- ➔ School catalog
- ➔ Other school publications
- ➔ Work-learning-service program policies and procedures

- ➔ Financial aid procedures
- ➔ Academic policies and procedures
- ➔ Student work-learning-service records
- ➔ Course curriculums

If your school is determined to be eligible for participation in the Work Colleges Program, the school's eligibility will be added to the COD Web Site and an award will be issued. We will notify the school by email that the award is reflected in the Statement of Account posted in the Campus-Based section of the COD Web Site. If your school is determined to be ineligible for participation, you will receive an email that will explain why your eligibility was denied.

Information about Participation in the Work Colleges Program

The Work Colleges Program is a component of the Federal Work-Study Program

A school participating in the Work Colleges Program receives an allocation under the FWS Program and another allocation under the Work Colleges Program. The school **must** set up two accounting records, one for each of these programs even if the school decides to transfer a portion or all its FWS allocation into the Work Colleges Program. This is true even though the allocation for the FWS Program and the Work Colleges allocation are in one G5 account. When a school, at its option, transfers a portion or all its FWS allocation into the Work Colleges Program, the accounting records for each program **must** clearly show that transfer.

The Work Colleges Program allocation **must** always be matched with institutional funds on a dollar-for-dollar basis. This is also true for any portion of the FWS allocation transferred into the Work Colleges Program. Any of the FWS allocation **not** transferred into the Work Colleges Program **must** follow the various match rates required under the FWS Program. However, those FWS match rates do not apply to funds spent under the Work Colleges Program for either the FWS allocated funds transferred into the Work Colleges Program or the Work Colleges allocated funds.

As a Work College participating in the Work Colleges Program the school **must** require all resident students who reside on campus to participate in a comprehensive work-learning-service program. The school may only award and pay funds under the Work Colleges Program to those students who have a financial need. The Work Colleges Program award given to a student **must not** exceed the student's need. Resident students without a financial need and resident students whose need has been met **must** be paid with only institutional funds. This also applies to any non-resident students participating in the comprehensive work-learning-service program.

When a school receives an FWS allocation, even if it decides to transfer a portion or all of that allocation into the Work Colleges Program, the school (unless it receives a waiver) **must** spend at least seven percent of its total FWS allocation to pay students employed in community service activities. Further, in meeting this requirement, at least one student **must** be employed as a reading tutor for children or performing family literacy activities. Although these community service requirements do not apply to the Work Colleges allocation, if the school transfers a portion or the entire FWS allocation into the Work Colleges Program, it **must** still meet the requirements above.

It is important to note that one of the purposes of the Work Colleges Program is to encourage students to participate in community service activities. Also, under the Work Colleges Program a school may use program funds to administer and develop community-based work-learning-service alternatives that expand opportunities for community service. In addition, a school may use those funds to promote the work-learning-service experience as a tool for community service-learning opportunities.

Students employed under the Work Colleges Program in community service as reading tutors for children or performing family literacy activities or as mathematics tutors for children **must** still be paid with funds that are matched by the institution on a dollar-for-dollar basis. The Federal share of 100 percent is only allowed for those types of employment under the FWS Program and not the Work Colleges Program. All funds spent under the Work Colleges Program **must** always be matched dollar-for-dollar.

It is important to note the following information regarding the percentages for other elements that are not compensation items or community service items under the Work Colleges Program versus the FWS Program:

- ➔ Under both the FWS Program and the Work Colleges Program, a school may carry forward and carry back funds up to 10 percent of its allocated funds under either program.
- ➔ Under both the FWS Program and the Work Colleges Program, a school may receive the regular administrative cost allowance based on total compensation paid to eligible students (five percent for the first \$2,750,000 spent under campus-based, etc.). However, in this case you may not claim funds twice by also using the separate Work Colleges allowable administrative allowance to pay for the same costs.
- ➔ Under the FWS Program, a school may transfer up to 25 percent of its total FWS allocation for an award year to the Federal Supplemental Educational Opportunity Grant (FSEOG) Program. The school may not transfer any of the Work Colleges allocation to any other Campus-Based Program.
- ➔ Under the JLD Program, a school may use the lesser of 10% or \$75,000 of its FWS allocation for the JLD Program. Under the Work Colleges Program, there is no limit set for JLD

activities. Under the JLD Program, the Federal share can be as high as 80 percent when using the FWS allocation. When performing JLD activities under the Work Colleges Program the match is always on a dollar-for-dollar basis.



U.S. Department of Education Institutional Application and Agreement to Participate in the Work Colleges Program for the 2023–24 Award Year

EXAMPLE

Application can be accessed via the U.S. Department of Education
Common Origination & Disbursement (COD) web site

Submission Deadlines, Signature and Mailing Instructions:

Beginning with the 2023-24 application year, separate deadlines and mailing instructions apply to new/first-time applicants to the Work Colleges program and returning applicants (those previously approved by the Department to participate in the Work Colleges program).

NEW Applicants: The deadline for new applicants to submit the Institutional Application and Agreement to Participate in the Work Colleges Program for the 2023-24 Award Year is **November 1, 2022**. Electronic submission of the application must occur before 12:00 midnight(ET).

This form must include a wet signature to be mailed along with the necessary documentation required of new applicants (see instructions). If the signed copy of the application is sent through the U.S. Postal Service, it must be postmarked by November 1, 2022 and mailed to:

United States Department of Education
Federal Student Aid
Grants & Campus-Based Division
Work Colleges Program
830 First Street, NE, Rm 63C2
Washington, DC 20202-5453

If the signed copy of the application is hand delivered by a commercial courier, use the address provided above, except use 20002 as the zip code. Hand Delivered applications must be received by 4:30 P.M. (ET) on November 1, 2022.

RETURNING Applicants: The deadline for returning applicants to submit the Institutional Application and Agreement to Participate in the Work Colleges Program for the 2023-24 Award Year is **March 6, 2023**. Electronic submission of the application must occur before 12:00 midnight (ET). This form must include a wet signature, see instructions. The printed and signed copy of the

application must be postmarked by March 6, 2023 and mailed to:

U.S. Department of Education

P.O. Box 1130

Fairfax, VA 22038

For overnight delivery, mail to:

U.S. Department of Education

4050 Legato Road #1100

Fairfax, VA 22033

Paperwork Burden Statement

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. The valid OMB control number for this information collection is 1845-0153. Public reporting burden for this collection of information is estimated to average 2 hours per response, including time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information. The obligation to respond to this collection is mandatory in accordance with the 1998 Amendments to the Higher Education Act of 1965 (Pub. L. 105-244 Sec. 424) and the Higher Education Opportunity Act of 2008 (Pub. L. 110-315). If you have comments or concerns regarding the status of your individual submission of this form, please contact the COD School Relations Center directly at 1-800-848-0978 or email at CODSupport@ed.gov.

Institutional Application and Agreement to Participate in the Work Colleges Program for the 2023–24 Award Year

Institution Name:		
Street Address:		
City:	State:	Zip Code:
OPEID:		
Authorized Official:		
Title:		
Telephone No:		
Email Address:		

Agreement

The undersigned authorized official hereby assures the Secretary of the U.S. Department of Education (the Secretary) that the institution will comply with all provisions of Section 448 of the

Higher Education Act of 1965, as amended (HEA), and the applicable program regulations, and makes the following assurances:

- ➔ The institution is a public or private nonprofit, four-year, degree-granting institution with a commitment to community service;
- ➔ The institution has operated a comprehensive work-learning-service program for at least two years;
- ➔ The institution requires students, including at least one-half of all students who are enrolled on a full-time basis, to participate in a comprehensive work-learning-service program for at least five hours each week, or at least 80 hours during each period of enrollment, except summer school, unless the student is engaged in an institutionally organized or approved study abroad or externship program;
- ➔ The institution provides students participating in the comprehensive work-learning-service program with the opportunity to contribute to their education and to the welfare of the community as a whole;
- ➔ The institution has a comprehensive work-learning-service program that:
 - Is an integral and stated part of the institution's educational philosophy and program;
 - Requires participation of all resident students for enrollment and graduation;
 - Includes learning objectives, evaluation, and a record of work performance as part of each student's college record;
 - Provides programmatic leadership by college personnel at levels comparable to traditional academic programs;
 - Recognizes the educational role of work-learning-service supervisors; and
 - Includes consequences for non-performance or failure in the work-learning-service program similar to the consequences for failure in the regular academic program.
- ➔ The institution understands that in addition to any separately allocated funds, the institution may transfer allocated 2021–22 Federal Work-Study (FWS) Program funds to the Work Colleges Program to provide flexibility in strengthening the self-help-through-work element in financial aid packaging for eligible students;
- ➔ The institution will match Federal funds used for the Work Colleges Program on a dollar-for-dollar basis from non-Federal sources; and
- ➔ The institution understands that available Federal funds may be used:
 - To support the educational costs of qualified students through self-help payments or credits provided under the work-learning-service program of the institution within the limits of Part F of Title IV of the HEA;

- ⦿ To promote the work-learning-service experience as a tool of postsecondary education, financial self-help, and community service-learning opportunities;
- ⦿ To carry out activities described in Sections 443 and 446 of the HEA;
- ⦿ For the administration, development, and assessment of comprehensive work-learning-service programs, including—
 - ✔ Community-based work-learning-service alternatives that expand opportunities for community service and career-related work; and
 - ✔ Alternatives that develop sound citizenship, encourage student persistence, and make optimum use of assistance under Part C of Title IV of the HEA in education and student development;
- ⦿ To coordinate and carry out joint projects and activities to promote work service learning; and
- ⦿ To carry out a comprehensive, longitudinal study of student academic progress and academic and career outcomes, relative to student self-sufficiency in financing their higher education, repayment of student loans, continued community service, kind and quality of service performed, and career choice and community service selected after graduation.

Application for Funds

I am requesting a separate allocation of \$ _____ for an anticipated _____ (enter anticipated # of students) students for the Work Colleges Program for the 2023-24 Year. (Do not include any amount you anticipate transferring from your 2023-24 FWS allocation.)

This Agreement may be terminated either by the Institution or by the Secretary under the applicable regulations governing this program. The Secretary will establish the termination date.

Signature of Authorized Official of the Institution Date _____

U.S. Department of Education Authorizing Official Date _____

Membership in the Work Colleges Consortium

- ➔ Criteria for Membership
- ➔ Eligibility
- ➔ Application

S.8

WORK COLLEGES CONSORTIUM

Criteria for Membership in the Work Colleges Consortium

ELIGIBILITY

All applicants **must** be recognized and approved as a Work College by the U.S. Department of Education.

TO APPLY

Eligible institutions may apply for membership in the Consortium using the attached application. Applicants **must** provide evidence of their qualifications for membership according to the criteria enumerated here. Membership applications are reviewed by Consortium staff and submitted to the Presidents' Council for decision.

A decision will be made within 90 days of receipt of the application and materials.

Please Note:

All colleges which meet the federal criteria and are approved by the U.S. Department of Education are eligible to receive Work Colleges funding whether or not they are a member of the Work Colleges Consortium.

Membership in the Consortium is open to any educational institution that:

- ➔ Is a public or private nonprofit, four-year, degree-granting college, or university with a demonstrated commitment to community service;
- ➔ Has operated a comprehensive student work-learning-service program for at least the two immediately preceding years before application to the WCC;
- ➔ Provides students participating in the comprehensive work-learning-service program with the opportunity to contribute to their education and to the welfare of the community as a whole;
- ➔ Has administered a Federal Work-study program for the previous two years and is in compliance with all applicable regulations governing such programs (e.g., Fair Labor Standards Act);
- ➔ Has the ability to carefully track and monitor student hours while participating in a work-learning-service program since working above or under hours can impact student financial aid awards and/or college budgeting;
- ➔ Requires all resident students, including at least one-half of all students who are enrolled on a full-time basis, to participate in a comprehensive work-learning-service program for at least five hours each week, or at least 80 hours during each period of enrollment, except

summer school, unless the student is engaged in an institutionally organized or approved study abroad or externship program;

- ➔ Is qualified as a Work College under regulations governing work colleges (Title: 34 Education, Part 675-Federal Work-study Programs / Subpart C);
- ➔ Is officially recognized by the U. S. Department of Education as a Work College;
- ➔ Is accredited by an accrediting agency recognized by the U.S. Department of Education [https:// www2.ed.gov/admins/finaid/accred/accreditation_pg5.html](https://www2.ed.gov/admins/finaid/accred/accreditation_pg5.html) and not under any form of probation or sanctions from such accrediting agency and if it is under probation or sanction, please provide detailed information;
- ➔ Is compliant with all financial reporting and audit requirements of the U. S. Department of Education and applicable accrediting agency;
- ➔ Is not under any form of probation or sanctions with the U. S. Department of Education pertaining to student aid, student loan or other federal programs;
- ➔ Has filed IRS Form 990 and applicable schedules for the institution's two most recent fiscal years. If not required to file such information with the IRS, has reported necessary lobbying disclosures as required by the work of the WCC;
- ➔ Has agreed to the Articles of Association;
- ➔ Has agreed to the Consortium's Fiscal Agency Agreement (with Berea College); and
- ➔ Agrees to make annual contributions to the WCC budgets.

The term comprehensive student work-learning-service program means a program that:

- ➔ Is an integral and stated part of the institution's educational philosophy and program;
- ➔ Requires participation of all resident students for enrollment and graduation;
- ➔ Includes learning objectives, evaluation, and a record of work performance as part of the student's college record;
- ➔ Provides programmatic leadership by college personnel at levels comparable to traditional academic programs;
- ➔ Recognizes the educational role of work-learning-service supervisors; and
- ➔ Includes consequences for nonperformance or failure in the work-learning-service program similar to consequences for failure in the academic program.

Membership Application for the Work Colleges Consortium

Please provide the following information:

College / University:
Federal OPE ID#:
Who is completing this form?
Name:
Phone:
Email:
Please provide names, phone numbers, and email addresses for:
President:
Director of Financial Aid:
Dean of Work:
Who is your accrediting agency?
Are you under any form of probation or sanctions?
If so, please explain:
When were you recognized as a Work College by the U.S. Department of Education?
Do you receive Title IV funding?
Do you participate in the Federal Work-Study Program?
How long have you participated in Federal Work-Study?
Which federal student aid programs do you administer? And for how long have you administered them?
Are you currently under monitoring by the U.S. Department of Education?

Including but not limited to federal compliance, financial responsibility, and administrative capabilities.
If yes, please explain:
Do you file IRS Form 990?
How long have you operated a comprehensive work-learning-service program?
How long has your comprehensive work-learning-service program been mandatory for all resident students?
Please answer the following questions and provide materials that describe and document your work program.
How many hours are students required to work?
How do you document, and capture hours worked and work performance?
How is student work evaluated?
Do students receive a grade for work, a work transcript, or work certificate of some type? If not, what is used as the student record of performance?
How is work integrated into your educational program?
How do you handle students (and their accounts) when they work over or under hours?
Do work supervisors receive training?
Describe how service is integrated into the culture of your institution.
Please return this application and supporting documentation to:

Executive Director
Work Colleges Consortium
CPO 2163
Berea, KY 40404

Please email us at info@workcolleges.org
 Call 859-985-3156 / 859-985-3154

Visit the Work Colleges Consortium website at www.workcolleges.org for more information.



WORK COLLEGES
CONSORTIUM