

**Pennsylvania's State System of Higher Education  
Office of the Chancellor  
Guidance**

**HOURLY STUDENT WORKER GUIDANCE  
March 20, 2020**

**On March 5, 2020, the U. S. Department of Education (ED) issued the following guidance for paying student workers who are disrupted by COVID-19. The underlined section was added for emphasis:**

**ED Electronic Announcement**

March 5, 2020 – [Guidance for interruptions of study related to Coronavirus \(COVID-19\)](#)

“Federal law includes a provision allowing an institution to make FWS [Federal Work Study] payments under certain limited circumstances to disaster-affected students who are unable to continue working. Given the unique nature of this situation, it is unlikely that an entire region would be declared a Federal disaster area, yet to students enrolled at a campus that must close temporarily, the loss of this important form of financial aid can be devastating. The impact may be magnified if the institution accommodates students by providing alternative instructional opportunities and the student is required to continue paying tuition, but the student loses FWS as an important part of their financial aid award. For students enrolled and performing FWS at a campus that must close due to COVID-19, or for a FWS student who is employed by an employer that closes as a result of COVID-19, the institution may continue paying the student Federal work-study wages during that closure if it occurred after the beginning of the term, the institution is continuing to pay its other employees (including faculty and staff), and the institution continues to meet its institutional wage share requirement. Students who were prevented from beginning a term at the institution as a result of a COVID-19-related disruption would not be eligible for Federal Student Aid for that term, and therefore could not be paid FWS wages for hours they did not work. Graduate students who are paid FWS wages on salary may continue to be paid for the remainder of the term if the institution is also paying its faculty and staff during that period. In these instances, institutions should document (as contemporaneously as feasible) that the COVID-19 disruption was the reason the student received FWS funds without documentation of hours worked.”

**System Conclusion:** Federal work study funds may be paid even if work is not performed for as long as the campus is disrupted by COVID-19 or until the end of the semester, whichever comes sooner.

**Principles for Fair and Equitable Treatment of Hourly Student Workers**

These guidelines are applicable to those students who remain enrolled full-time for the remainder of the semester. The following are scenarios to help institutions determine financial decisions relative to payment to student workers who are paid through 1) institution, state, or federal work study funds, and 2) institutionally funded student workers not part of a work study program. Institutional decisions to pay students for work not performed should remain consistent for all work study students.

**Federal work study vs. Institutional-funded work study vs. Institutional-funded non-work study** —Some universities treat work study as one combined program regardless of fund source. Students know they have a campus job or work study award but may not know the fund

source. Treating work study students (federal-funded work study and institutional-funded work study) different depending on their fund source may create equity issues. Universities will locally manage decisions regarding student work that is not part of the work study program.

The following guidance is applicable for as long as a campus is disrupted by COVID-19 or until the end of the Spring 2020 semester, whichever comes sooner.

<b>Scenario</b>	<b>Guidance</b>	<b>Other Comments</b>
A student has Federal Work Study (FWS) and is able to work on site or remotely and the campus has work for the student to do.	Pay the student for the hours worked on site or remotely.	Timesheets are required; alternative work assignments may be provided by the university.
A student has received Federal Work Study and the student is able to work remotely but the campus does not have any remote work available.	Pay the student without work being performed as long as non-FWS student workers receive the same availability for pay without work.	Document in the student's file that timesheets were not required to be collected due to COVID-19 disruption.  See below for suggested payout methods
A student has received Federal Work Study and is offered remote work and chooses not to take it.	Do not pay the student.	Documentation of student choosing not to work.
A student worker is being paid through institutional funds (either work study or non-work study) and is able to work on site or remotely and the campus has work for the student to do.	Pay the student for the hours worked on site or remotely.	Timesheets are required; alternative work assignments may be provided by the university.
A student worker is being paid through institutional work study funds and is not able to work and the institution does not have remote work available.	The student may be paid at the university's discretion without work being performed.	Federal guidance implies the institution is to follow the same procedures for all work study student workers.
A student worker is being paid through other (non-work study) institutional funds and is not able to work and the institution does not have remote work available (the university may assign alternative work).	Local decisions.	Some universities allow departments to hire student workers outside of the financial aid process; therefore, their work/pay is not awarded (up to a maximum dollar amount) as a source of financial aid.
A student does not return and/or withdraws from classes.	Student should not work or be paid further.	

**Methods for Payment:**

- For institutions who are paying student workers who cannot work remotely, the recommendation is to take the average pay of the last three pay periods to determine payment amount. Students cannot receive more than the allocated total award amount or exceed the maximum allowable hours. An alternative batch pay process will be followed to activate pay without students completing timesheets.
- Students who are working need to follow the normal process for entering time worked in order to have their payment processed through the regular student pay methods.