

# Policies and Procedures Manual for Students and Supervisors



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# Federal Work-Study and Student Employment Policies and Procedures

## Introduction

Welcome to the National University of Natural Medicine Federal Work Study and Student Employment. This handbook provides a general overview of the Student Employment Program (STEP), including the Federal Work-Study Program (FWS), to assist in answering related questions.

Questions, concerns and suggestions regarding the FWS should be directed to the Financial Aid Office. The office is located in Suite 200 of the Administration Building. We can be reached by calling (503) 552-1618 or (503) 552-1616, or by emailing the Financial Aid Office at [financialaid@nunm.edu](mailto:financialaid@nunm.edu)

## The Student Employment Program (STEP)

The program provides job opportunities that compliment and reinforce our student's educational and career goals. The program is available to students as an alternate resource to earn money to help cover educational expenses. Students must work to receive the money and cannot earn more than the amount that is budgeted on the Student Hire Form. Student employees earn an hourly wage and are paid monthly. The hours worked cannot interfere with scheduled class hours.

- **Please contact the registrar for availability of student employment funds.**

**A student cannot work under the federal work study program and work as a student employee with a particular department at the same time.**

## Student Employment Criteria

The following are student employment criteria that a student must meet to participate in the student employment program (any one of the following criteria):

- Students not eligible for the federal work study program.
- Jobs that do not qualify as work study jobs.

## The Federal Work-Study Program

The Federal Work-Study Program provides federally subsidized jobs for students with demonstrated financial need. The program emphasizes community service and student service work both on and off-campus, providing job opportunities that compliment and reinforce our student's educational and career goals. The program is available to students as an alternate resource to earn money to help cover educational expenses.

Students must work to receive the money included in their financial aid award and cannot earn more than the amount of their awards. Student employees earn an hourly wage and are paid monthly. The hours worked cannot interfere with scheduled class hours.

### ❖ **Community Service**

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NUNM is required to make students aware of community service opportunities and actively involve them in community service activities. Community services are defined as services that are designed to improve the quality of life for community residents, particularly low-income individuals, and/or to solve particular problems related to their needs.

### ❖ **Off-Campus Employment**

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In order to earn a FWS award through an off-campus employer not associated with the National University of Natural Medicine, an off-campus agreement must be signed and renewed yearly. The agreement specifies the relationship between the employing agency and its adherence to the Federal Title IV regulation eligibility requirements and NUNM. The Financial Aid Office and the off-campus employer's work together to establish these agreements and students are not authorized to begin this process.

Students employed off-campus by a federal, state or local public agency or by a private non-profit organization may be able to earn their FWS award through that organization. The work performed must be in the public interest and it is preferable that the jobs provide the students with experience related to their academic or vocational goals.

Work in the public interest is defined as work performed for the welfare of the nation or community, rather than work performed for a particular interest or group.

Any non-profit organization working under an off-campus agreement with NUNM is required to cover 25% of the wage and incidental fees of approximately 5% (workers' compensation, federal and state withholding, etc.) for the Federal Work-Study student employee participant. Non-profit employers are billed at the end of each payroll cycle, and all payments must be remitted within 30 days of date on billing statement.

A limited number of FWS student employees may work at for-profit agencies. Federal regulations mandate that all FWS employment at for-profit agencies be related to the student's field of education and does not qualify as a community service FWS position. Any for-profit organization working under an off-campus agreement with NUNM is required to cover 50% of the wage and incidental fees of approximately 5% (workers' compensation, federal and state withholding, etc.) for the Federal Work-Study student employee participant. For-profit employers are billed at the end of each payroll cycle, and all payments must be remitted within 30 days of date on billing statement.

NUNM actively participates in the America Reads program. Any non-profit agency or public school interested in providing reading tutors to elementary school children is encouraged to contact the Financial Aid Office at (503) 552-1618 or [financialaid@nunm.edu](mailto:financialaid@nunm.edu). Any America Reads eligible agency working under an off-campus agreement with NUNM is exempt from covering any part of the student employee wages.

## Federal Work-Study Conditions and Limitations

The Department of Education, as published in *The Student Financial Aid Handbook*, has mandated conditions and limitations regarding FWS employment. They are summarized as follows:

- ◆ FWS employment must be governed by employment conditions, including pay, that are reasonable according to the type of work performed, the geographic region, the employee's proficiency, and any applicable federal, state or local law.
- ◆ FWS employment must not displace employees (including those on strike) or impair existing service contracts. Replacement is interpreted as displacement.
- ◆ FWS positions must not involve constructing, operating, or maintaining any part of a building used for religious worship or sectarian instruction.
- ◆ FWS employers may not solicit, accept, or permit soliciting any fee, commission, contribution, or gift as a condition for a FWSP student's employment.
- ◆ FWS student employees must be paid for all hours worked. The Fair Labor Standards Act prohibits employers from accepting voluntary services from any paid employee.
- ◆ A student may receive academic credit for the work performed and be compensated by FWS earnings. **CAUTION:** FWS wages cannot be paid or earned for any academic credit unless all students participating in the same academic credit are paid as well, FWS student or not, and the payment cannot be rendered for receiving instruction in a classroom, laboratory, or other academic setting. In short, if the position is not normally a paid position, it cannot become a paid position for the purpose of earning FWS wages.

### Certifying FWS Eligibility

In order to be Federal Work-Study Program eligible, students must be need-based and awarded FWS as a part of their financial aid package. FWS funds are awarded annually and expire the last day of each academic year; June 30. If you are unsure of your FWS

eligibility, please contact the Financial Aid Office at (503) 552-1616 or (503) 552-1618 or [financialaid@nunm.edu](mailto:financialaid@nunm.edu)

## **NUNM Federal Work-Study and Student Employment Policies**

### **❖ Code of Conduct**

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FWS student employees must adhere to the Student Code of Conduct and Student Honor Code as stated in the Student Handbook. FWS students are not allowed to work unsupervised or to practice medicine without a license. This includes, but is not limited to diagnosing, treating, advising, and advertising without licensed supervision or licensure. Failure to adhere to these policies will result in immediate termination from the work-study program.

### **❖ General Supervisory Requirement**

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Work-study students are not allowed to work for another person that is not assigned as their primary work-study supervisor or secondary work-study supervisor.

### **❖ Orientation and Training**

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The student's work schedule, the job requirements, and the terms of employment must be defined by the supervisor and explained to the student worker when the student begins employment and preferably at the employment interview. In addition, it is expected that supervisors will introduce new student employees to the office and to regular employees in the same manner that a permanent staff or faculty member is welcomed. The introduction includes not only the people the student will be working with, but also offers a broad overview of the purpose of the department's existence and the procedures and flow of work through the area.

### **❖ Scheduling Work Hours**

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The FWS/STEP awards should be reviewed prior to scheduling work hours to make sure that students are able to take full advantage of the award without exceeding the award amount. **Remember that many students work more than one job.** Supervisors are encouraged to contact each other to coordinate the student's work hours.

Please monitor the student's work hours carefully. **FWS/STEP will not pay overtime hours.**

In addition, studies reveal that students who work in excess of 20 hours per week are more likely to suffer academic difficulties. It is important that supervisors make sure that students are not exhausting themselves to the detriment of their class attendance and grades.

## ❖ Use of Personal Vehicle for NUNM Business

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The NUNM Employee Handbook states that “when NUNM business needs or job duties require the use of a personal vehicle for transportation, or when an employee chooses to use their personal vehicle, the following policies apply: It is expected that any employee using a personal vehicle for NUNM business needs will have the required driver’s and vehicle insurance coverage, a valid driver’s license, and will follow all traffic regulations. Traffic tickets and/or accidents incurred while using a personal vehicle in the course of employment are the employee’s responsibility. “

Students using a personal vehicle in the performance of an approved FWS/STEP position must provide proof of insurance, valid vehicle registration and a valid driver’s license.

## ❖ General Performance Expectations

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Student employment requires the same expectations and courtesies of permanent NUNM employees. The expectation is that an employee will arrive on time, work while on the job, and stay through their scheduled time. If students are ill and unable to perform job duties on a given day, they are expected to notify the supervisor(s).

Keeping in mind that students are expected to maintain satisfactory academic performance; supervisors are encouraged to be flexible whenever possible. If changes in work schedules need to be made or a conflict arises outside of work, an advance request **must** be made to the supervisor.

Key issues to be observed by students as defined by supervisors in most jobs are:

- ◆ Confidentiality
- ◆ Dependability
- ◆ Appearance
- ◆ Telephone/Office etiquette
- ◆ Work ethic
- ◆ Job or task requirements

Each job will have a different emphasis on the relative importance of these issues. It is the supervisor’s responsibility to train the students and highlight the areas of particular importance to the job responsibilities.

## ❖ Professionalism and Confidentiality

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Student employees who have access to confidential information are expected to act in a professional manner and to handle the information with the utmost sensitivity and discretion. The release of such confidential and personal information is prohibited by

the Family Educational Rights and Privacy Act of 1974 (FERPA). Student employees sign their agreement to confidentiality when they complete the *Student Participation Agreement* prior to applying for work study. The Financial Aid Office maintains the copies of the above-mentioned agreements.

#### ❖ Performance Reviews

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NUNM is dedicated to educating students to be successful in their chosen fields of interest. Student employment is viewed as an opportunity for students to perfect skills that will be useful in pursuing their career goals. It is also an opportunity for supervisors to “teach” the necessary skills to help ensure the success of students after they leave NUNM.

### Federal, State and Local Employment Requirements

#### ❖ I-9 Form

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The I-9 form is required by the U.S. Department of Justice, Immigration and Naturalization Service. Proper identification will be requested of the student and photocopies may be made to accompany the form. The I-9 verifies a prospective employee’s United States employment eligibility and must be on file for each student employee **before** the student can begin working. Paychecks cannot be released until the I-9 is completed and signed by the NUNM Payroll specialist. The I-9 form is kept on file with Payroll.

#### ❖ W-4 Form

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The purpose of the W-4 Form is to provide tax status information so that the university can withhold the correct amount of Federal, State and Local income tax from a student’s paycheck. Each student is responsible for determining the correct number of exemptions to be filed. Questions about the correct number of exemptions to claim should be directed to the U. S. Department of Treasury Internal Revenue Service or to your tax advisor. The form is required by the U.S. Department of Treasury Internal Revenue Service and is kept on file with Payroll.

### Bureau of Labor and Industries Regulations (BOLI)

All employers in Oregon, except US government employers, must comply with state laws that establish appropriate working conditions for employees even though federal law does not require these same standards (OAR 839-20-050).

#### ❖ Rest Periods

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Oregon law requires a period of rest of not less than ten minutes without deduction from the employee's pay for every segment of four hours, or the major part of four hours, worked in one work period. This time must be taken in addition to and separately from time allowed for meals. Insofar as feasible, the break should be taken approximately midway in the segment of work.

#### ❖ Meal Periods

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**Meal periods of not less than 30 minutes must be provided to employees who work shifts of six or more hours.** For work periods of seven hours or less, but at least six, the meal period is to be taken between the second and fifth hour worked. If the work period is more than seven hours, the meal period must be taken between the third and sixth hour worked. If an employee is required to remain on duty during the meal period or performs any tasks, the employee must be paid for the meal period. Note: Meal periods must be 30 minutes without interruption to be unpaid time.

### Federal Work-Study Award Notification

#### ❖ Applying for Federal Work-Study

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In order to be considered for a Federal Work-Study award, students must complete the *Free Application for Federal Student Aid* (FAFSA) every year. The applications are available each January at the [www.fafsa.ed.gov](http://www.fafsa.ed.gov) web site. Students who do not apply for financial aid using this form cannot be considered for a Federal Work-Study award. Students interested in being considered must answer "yes" to the question regarding work study on the FAFSA.

#### ❖ Notification of Funds

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FWS is awarded in the order in which the FAFSA information is received at NUNM and based exclusively on the student's eligibility to participate. First consideration is to those students who meet the priority-packaging deadline of Feb. 15th each year. Students are notified of their eligibility to earn FWS on their Financial Aid Award Letter. The award letter includes the maximum amount the student may earn during the award year. The award year spans the period of July 1<sup>st</sup> to June 30<sup>th</sup>. Once funds have been exhausted, students may choose to be put on a waitlist, which does not mean the student is guaranteed an increase in FWS funds.

The Federal Work-Study Program is extremely popular with both students and employers. You should **never assume that additional FWS funds are available**. Once the total amount of the award has been earned, students are no longer eligible to work or be paid from the Federal Work-Study Program. Students wishing to be reviewed for additional funding may request to be put on the FWS waitlist. Pending a decision from the Financial Aid Office regarding increased student eligibility and available funding, the

employer desiring to retain the student may pay for hours worked from the department's budget, but departments are not required to continue the student's employment.

### ❖ Eligibility during Periods of Non-Enrollment

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Students may be employed under the Federal Work-Study Program during periods of non-enrollment as long as they have an applicable FWS award as a part of their financial aid package and have signed the *Student Participation Agreement*. The net earnings received should be used to pay educational costs during the next period of enrollment. Eligible periods of non-enrollment include summer or an equivalent vacation period. Students must also be planning to enroll for the next regular term of enrollment. Students cannot be on an official Leave of Absence (LOA) and earn a FWS award.

- **Students who earn their FWS award during periods on non-enrollment should not assume that additional funds will be available and budget accordingly.**

### ❖ Reallocation of FWS Funds

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The Financial Aid Office will review the Federal Work-Study account and determine **if any** funds are available for reallocation. This review begins at the end of fall term and is repeated at the end of subsequent terms throughout the award year. Priority for reallocated funds is given to students who applied for an award but did not receive one because of limited funding.

Students who opt not to use their FWS awards should notify the Financial Aid Office as soon as possible. Under no circumstances can a student designate to whom the funds are reallocated.

Priority reallocation of FWS funds is as follows:

- ◆ FWS Waitlisted Students
- ◆ Reduced Initial Awards Students
- ◆ Students applying for increased awards after having used their initial award

### ❖ Increased FWS Awards

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Increased awards are considered on an individual basis and are not guaranteed. If you would like to be considered for an increased FWS award, please inquire with the Financial Aid Office about a FWS waitlist. We will determine the student's eligibility (including priority reallocation assessment) and send written notification of any revisions to the award. If you have not heard from us within two weeks of the request, please call or visit our office.

## ❖ **Decreased FWS Awards**

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FWS awards are subject to change and/or reduction, if necessary, to maintain the program within the federal allocation.

FWS awards are reviewed at the end of each term beginning with the fall term to ensure that the federal funds are being fully utilized and that all eligible students have an equal opportunity to benefit under the program. Students who under-utilize their awards will forfeit a portion of their award to students on the FWS waitlist or to students whose initial awards were reduced due to limited funding.

Although students are allowed to earn their entire award in as short an amount of time if they wish, students who at the end of fall term have not used at least one-third of their award may forfeit that portion to students on the FWS waitlist.

The process is repeated at the end of winter term wherein students who have not earned at least two-thirds of their award may forfeit that portion to students on the FWS waitlist.

Understanding that students may work more in one term than another, students who are within \$100.00 of earning the cut-off amount at the end of each term will not have their awards reduced.

In addition to the above, students who have not been hired and begun earning their award within the term they are first awarded will have 1/3 of their award reallocated.

### **Federal Work-Study Program Position Descriptions**

Federal Work-Study Program regulations require that a position description be maintained on all FWS student hired positions. Each position description must include the following information:

- ◆ Name of the position;
- ◆ Classification of the position (e.g., TA, Office Assistant, Library Assistant)
- ◆ Department or office in which the student will be employed;
- ◆ Location where the student will perform his/her duties;
- ◆ Name of the student's supervisor;
- ◆ Purpose or role of the position within the organization;
- ◆ Duties and responsibilities associated with the position and how they relate to the purpose or role;
- ◆ General qualifications for the position and the specific qualifications for the various levels or rates of pay associated with the position;
- ◆ The length of the student's employment (beginning and ending dates)

At the beginning of each year all supervisors participating in the Federal Work-Study Program will be required to renew their position, along with a Supervisor Participation Agreement and acknowledge that they have read and understand the FWS Policies and Procedures Manual. These will be available online for the upcoming year, which begins July 1<sup>st</sup>. In all cases, position descriptions must be completed and filed with the Financial Aid Office **prior** to hiring students. The Financial Aid Office will review each position, and upon approval, post the job online at [www.nunm.edu](http://www.nunm.edu) under the Work-Study section of "Student Services."

It is recommended that employers submit a maximum of two position requests per academic year. Faculty and staff who hire many students to do essentially the same job are encouraged to file a position description that is as broad as possible; e.g. instructors who hire several Teaching Assistants may want to file one position description that details the job duties and qualifications that encompass all classes and sections taught, rather than one for each individual class or course.

It takes the Financial Aid Office approximately 2 weeks processing time to post and activate a job once all paperwork has been submitted. If you plan to hire FWS students over summer term (beginning July 1<sup>st</sup>), it is crucial that your paperwork is submitted to allow for enough time for processing. Otherwise, jobs for the fall, winter and spring terms can be posted at any time between July 1<sup>st</sup> and June 30<sup>th</sup>.

### ❖ Position Openings

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The Financial Aid Office maintains Federal Work-Study/Student Employment job listings for students and employers. All Federal Work-Study/Student Employment positions are posted online at [www.nunm.edu](http://www.nunm.edu) under the Work-Study section of "Student Services." **It is the student's responsibility to contact the appropriate supervisor for job availability.** The Financial Aid Office is not responsible for job recruitment or placement. Supervisors must advertise job openings of their own accord.

The FWS/STEP award gives students earning power but does not place the student in a job. Students are expected to seek and find a position. In turn, employing departments and clinics are expected to maintain their staff and to seek eligible and qualified student employees. The Financial Aid Office acts as a liaison, rather than a placement agency, for students and supervisors and may assist those having trouble finding or filling a position. Students must contact departments they are interested in working for and respond to job notices when looking for employment.

## Hiring Procedures

**Important Notice:** As Federal, State and Local penalties to the institution are severe for non-compliance, all employers and students must have on file with the Financial Aid Office a signed Participation Agreement prior to the hiring or beginning of work. This agreement underscores the responsibilities of both employers and employees in the hiring regulations and compliance, as well as the consequences for failure to comply with mandated regulations.

#### ❖ Hire Forms

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The Financial Aid Office provides hire forms. It is the responsibility of the Financial Aid Office to verify employment eligibility for FWS/STEP before hiring.

- **New hire forms must be completed each award year for all new and returning Student Employment and Federal Work-Study employees.**

The award year is defined by the Department of Education as July 1<sup>st</sup> to June 30<sup>th</sup>. Students that intend on earning their Federal Work-Study award must have all of the necessary forms on file in both the Financial Aid Office and the Payroll Office prior to working. Without the required paperwork, NUNM cannot pay the students from the FWS/STEP Program funds and students will be paid from department budgets.

The required forms for working in a FWS/STEP position are:

- ◆ I-9 Form
- ◆ W-4 Form
- ◆ Student Participation Agreement
- ◆ Federal Work-Study Hire Form

### Getting Paid

Student employees are paid once each month. To be paid on time, electronic timesheets must be approved by 11:59PM on the scheduled deadline date (typically the 26<sup>th</sup> of each month and modified slightly for holidays) on the TsX website by the student's supervisor. Paychecks are made payable to the students and will be available on the first of each month. If the first falls on a weekend, paychecks will be disbursed to the student's mailbox on the next available business day. However, student employees now have the option of receiving their pay check through direct deposit in place of physical checks.

**Students are required by law to submit all hours worked in any given month. It is against FWS policy to work hours and fail to record these hours in the same month. Students must record hours worked at the end of each shift. Failure to adhere to FWS Policies and Procedures may result in participation revocation.**

Funds earned under the Federal Work-Study Program are primarily designed to offset the student's educational costs while attending the National University of Natural Medicine. Students should make every effort to closely monitor earnings and budget appropriately.

### ❖ Wages

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Federal Work-Study and Student Employment students are paid an hourly wage that cannot fall below the State of Oregon minimum wage. The current FWS/STEP student hourly wage is \$15.00 for both on and off-campus and all NUNM affiliated clinics.

### ❖ Electronic Timesheets – TimesheetX (TsX)

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The Financial Aid Office administers/maintains a timesheet database called TimesheetX which can be accessed at <https://NUNM.studentemployment.ngwebsolutions.com>. Supervisors and students are provided with a user name and manual for instruction. Timesheets list the student's name, pay period and the employing department.

Supervisors must approve timesheets on or before the designated deadline. TimesheetX sends email reminders to all supervisors when deadlines are approaching. Supervisors may elect to have a secondary supervisor to assist in supervising and approving timesheets in their absence.

Supervisors are encouraged to revisit the online timesheet database to ensure all timesheets and hours have been submitted and/or approved. If a student fails to document their hours and/or submit their timesheets, it is the supervisor's responsibility to do so. The supervisor must take possession of the timesheet and indicate the hours worked before submitting to payroll. Additionally, students who do not work at all during any given pay period need to "dismiss" their timesheets.

➤ **Timesheets are due by 11:59PM of the scheduled due date (typically the 26th of each month).**

FWS regulations mandate that all students be paid on time and at least once a month for all hours worked during a pay period. **Students may not save or accumulate hours to submit at one time.** For federal compliance reasons, no amount of time worked is too small to be paid within the payroll period.

Late timesheets are not only an inconvenience, but are a violation of both the Supervisor and Student Participation Agreements. Supervisors and students who fail to submit/approve hours are in violation of the FWS Program. Subsequent late timesheets

by either supervisor or student will result in FWS privileges being revoked for a minimum of 1 academic term, or permanently. Final decisions are at the discretion of the Director of Financial Aid.

## **Monitoring Federal Work-Study Program Funds**

The Financial Aid Office is the guardian of all Federal Work-Study Program employment funds. In accordance with federal regulations, this office is involved in monitoring earnings and expenditures from the Federal Work-Study Program and reporting earnings to the Department of Education annually.

- **It is the responsibility of the student and the supervisor to monitor hours worked and make sure they do not exceed the student's FWS/STEP award.**

When the award is fully earned, a notice is sent to both the student and supervisor advising them that the award maximum has been reached and the student must stop working in the work study program. Earnings in excess of the award maximum will be charged to the department's own budget. Penalties for over earning the first time will result in a decrease to a student's work study award and cost of attendance budget in the following year. The amount of reduction will be equal to the amount over-earned. Students who continue to over-earn in subsequent years will be subject to suspension and/or termination from the program.

Please monitor earnings carefully. While the FWS coordinator endeavors to keep students and employers up to date on awards and earnings, ultimately supervisors and students are responsible for monitoring hours worked, balancing their own budgets and adhering to the awarded FWS funds. Never hesitate to contact the Financial Aid Office to find out how many dollars you have remaining in your award.

Students and supervisors can view earnings and award balances on the TimesheetX website.

## **Termination of Federal Work-Study Employment**

There are circumstances under which student employees are automatically terminated from the Federal Work-Study Program:

- ◆ FWS award is fully earned
- ◆ An eligibility requirement is no longer being met by the student
- ◆ The student has not met Satisfactory Academic Progress requirements
- ◆ Separation from school, including leave of absence
- ◆ The student's financial need has been met for the award year
- ◆ Misconduct (including unexcused absences, "no-call, no-show")
- ◆ Falsifying documents, including timesheets

- ◆ Breach of Confidentiality
- ◆ Failure to adhere to the Student Code of Conduct and/or Student Honor Code
- ◆ Other-at the discretion of the Director of Financial Aid

In addition, failure to comply with the guidelines and regulations outlined in the Federal Work-Study Program Handbook can be cause for termination from FWS eligibility now and in the future as determined by the Director of Financial Aid.

Students may also be terminated at their own request and at the request of the employer. Where possible, it is expected that a suitable notice of intent to leave a position is given.

### **Federal Work-Study Benefits**

In addition to the financial benefits, there are other reasons to consider a federal work-study job. Many NUNM students believe this program helps them feel connected to the broad community of NUNM students, staff, faculty and alumni. The program can encourage further networking with NUNM physicians and administrators and provides many opportunities to gain useful career experience.

Federal work-study is one of higher education's greatest resources for students. Explore your options and find the job that works best for you!