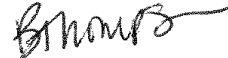


October 23, 2020

INTERPRETIVE STATEMENT

SUBJECT: 2020-21 State Work-Study Operational Flexibility During Response to COVID-19

FROM: Becky Thompson, Director, Student Financial Assistance



TO: Financial Aid Administrators

This interpretive statement sets forth the Washington Student Achievement Council's (WSAC) interpretation of Chapter 28B.12 RCW governing the State Work-Study program, and administrative rules adopted in Chapter 250-40 WAC, to provide guidance to financial aid administrators at participating higher education institutions for carrying out the purposes of the program during the unique circumstances of the global pandemic in the 2020-21 academic year.

The purpose of the [State Work-Study](#) (SWS) program is to provide financial assistance to eligible, resident students from low- and middle-income families with financial need who are attending eligible postsecondary institutions in Washington by stimulating and promoting their employment. ([RCW 28B.12.020](#)). SWS is an integral part of Washington's student financial aid system with the primary purpose of assisting eligible, resident students with financial need in bearing the full cost of their postsecondary education and degree attainment.

On February 29, 2020, the governor issued [Proclamation 20-05](#), proclaiming a State of Emergency for all counties throughout the state of Washington as a result of the coronavirus disease 2019 (COVID-19) outbreak in the United States and confirmed person-to-person spread of COVID-19 in Washington.

On March 13, 2020, the governor issued [Proclamation 20-12](#) which extends directives of the original and subsequent proclamations to help preserve and maintain life, health, property or the public peace, and prohibits many activities in all counties of Washington State related to the operation of all public and private public and private universities, colleges, technical schools, apprenticeship and similar programs, including prohibiting in-person classroom instruction and lectures related to all educational and apprenticeship related programs. The proclamation also states, "Nothing in this Proclamation is intended to prevent institutions from taking appropriate steps to preserve accreditation, student financial aid or student visa status."

The negative impacts of the pandemic on Washington students and postsecondary institutions beginning in spring 2020 have not abated. Many physical campuses remain closed as institutions primarily deliver instruction remotely, with typical on-campus SWS employment opportunities largely unavailable to awarded students. As of September 2020, Washington's unemployment rate was 7.8%

State Work-Study Interpretive Statement

October 23, 2020

Page 2

according to the Employment Security Department's (ESD) [most recent publicly available data](#), similarly limiting off-campus SWS opportunities for the foreseeable future.

Based on these unprecedented impediments to SWS achieving its primary purpose, WSAC is providing the following operational flexibility within SWS for the purposes of the 2020-21 academic year:

For eligible students awarded SWS (defined in [WAC 250-40-040](#)) who are unable to perform regularly scheduled work hours or tasks as a result of an employer's COVID-19 suspension or significant alteration of normal business operations, SWS will continue to reimburse employers for the applicable program share of eligible hours through the remainder of the 2020-21 academic year as long as the SWS employer continues to pay its share of gross student wages for those hours. To receive reimbursement under these conditions, there is no change to the operational process for employers. Hours eligible for SWS reimbursement under this option include, but are not limited to, performing typical job tasks, remote work, including project-based assignments, or not working because of COVID-19 limitations.

Alternatively, or in addition to continued work, institutions may also utilize their 2020-21 SWS allocations to fulfill the state's financial aid commitment to awarded students by reclassifying 2020-21 SWS awards as general financial aid in lieu of compensation under WAC 250-40-050, up to the maximum of the student's remaining SWS award, and without an associated employer match requirement. Eligible students must have demonstrated their intention to be "work-ready" in 2020-21 and continue to meet all SWS eligibility requirements throughout the period of award. Possible "work-ready" examples include, but are not limited to, the student attending a virtual Human Resources orientation conducted by the employer (whether paid or unpaid), documentation indicating that the student actively searched or inquired about available SWS positions, or having prior SWS employment experience.

While WSAC believes this interpretive statement of the operational flexibility described above provides stakeholders with essential tools in achieving SWS's primary purpose under the current circumstances, this in no way diminishes the agency's fundamental goal of ensuring that students earn SWS wages in active, career-related employment with an associated employer matching contribution where possible. SWS maximizes student service when it leverages additional resources from participating employers within traditional SWS jobs. Additionally, SWS maximizes student benefit when students are actively engaged in hands-on, real-world job experiences to the largest degree possible. WSAC continues to encourage institutions to maximize available SWS employment opportunities in 2020-21, including remote jobs such as tutoring or peer-to-peer financial aid application completion assistance efforts. With that said, WSAC firmly believes the 2020-21 emergency operational flexibilities described above are critical to effective SWS functionality and stakeholder service amidst the ongoing employment limitations resulting from the pandemic, and fully endorses institutions using those flexibilities as needed on a term by term basis within the parameters of the guidance outlined above.