State Work Study (SWS) & COVID-19
March 2020

Program Guidance

For SWS employees 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:

**Option 1** - SWS will continue to reimburse employers for the applicable program share of eligible hours through the remainder of 2019-20, 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.

**Option 2** - Alternatively or in addition to Option 1, institutions may also utilize their remaining 2019-20 SWS allocations to fulfill the financial aid commitment made to current SWS students by reclassifying their remaining 2019-20 SWS awards as general financial aid, rather than anticipated wages, up to the maximum of the student’s remaining SWS award. Eligible students must have documented SWS earnings in the same academic year and continue to meet all SWS eligibility requirements. The employer would not be required to match as under Option 1 above, but institutions must ensure that the emergency SWS awards are provided equitably.

Frequently Asked Questions:

1. **Can an institution employ both Option 1 and Option 2, or does it have to choose one or the other?**
   Institutions can utilize one of these options, or both Option 1 and Option 2, as best serves the interests of individual students, and is possible within the limits of the institution’s remaining SWS allocation.

2. **Does our institutional SWS allocation include employer matching dollars, especially as that relates to the use of Option 2?**
   No, institutional SWS allocations only include the state portion associated with gross SWS awards. Institutions may convert any amount of their remaining SWS allocation to general financial aid under Option 2 to serve eligible SWS students who have previously earned SWS wages in 2019-20.

   Institutions determine how much they can award to each eligible student from their remaining SWS funds, and per individual student award maximums, but we ask that you distribute available SWS funds equitability across the eligible student population funded under Option 2.

   Remaining institutional SWS allocations, and whether or not the institution can match any of these dollars, will determine how much emergency SWS funding can be awarded to individual students. There is no requirement for institutions to match the amount of its SWS program allocation that it is converted to general financial aid under Option 2.
3. How will public institutions request SWS funds for use under Option 1 and/or Option 2?
Public institutions will submit cash requests through the WSAC Portal for to draw down any amount of remaining SWS funds for use in either Option 1 and/or Option 2 using the standard operational procedure. We strongly encourage public institutions to make timely and regular SWS cash requests.

4. How will private institutions request SWS funds for use under Option 1 and/or Option 2?
Private institutions will submit time sheets through the WSAC Portal for on- or off-campus employer reimbursement under Option 1 using standard operational procedures, some with slight modifications that have already been established with affected institutions.

Financial Aid Directors at private institutions will be provided with a temporary permission within the WSAC Portal to draw down any amount of remaining SWS funds within their 2019-20 allocation to fund direct payments to students under Option 2. SWS will be reaching out to Financial Aid Directors individually to ensure Option 2 funding request functionality is established for all private institutions.

5. How should institutions document emergency SWS distributions under Option 2?
Institutions must keep a record of their emergency SWS distributions consistent with other state financial aid documentation. Institutions must track the eligible students served, emergency SWS distribution amounts, and the date of the emergency distribution under Option 2 for audit and Unit Record Reporting purposes.

These emergency SWS awards will be reported in the same way as traditional SWS earnings on the 2019-20 Unit Record Report.

6. Is a student directive required for students at private institutions receiving emergency SWS funding?
Private institutions must distribute emergency SWS funds to students under Option 2 according to the instructions of individual students’ Student Directive for current WCG/CBS recipients, and students must be notified that they can change their selection.

Non-WCG/CBS students eligible for emergency SWS distributions under Option 2 must be provided with the opportunity to select how they wish to receive those funds, although colleges can indicate the a default option as long as it is clear how a student can change it, ideally through an electronic Student Directive.