

HARVARD UNIVERSITY



Policy on Federal Work Study on Sponsored Awards

Effective: January 1, 2020

Revised: December 1, 2020

Responsible Office: Office for Sponsored Programs

Policy Statement

Harvard University does not allow the use of federal funding to meet the institutional funding requirements of its Federal Work Study (FWS) program. The institutional share of FWS cannot be charged to federal funds and cannot be charged to federal cost sharing activities. Other Harvard funding, such as non-federal sponsored awards, non-sponsored gifts, unrestricted funds, or endowment funds, can be used for the institutional share of FWS if allowed by the terms of the fund.

Reason for Policy

Harvard University participates in the U.S. Department of Education Federal Work Study need-based financial aid program and is required to comply with federal regulations related to hiring and funding student workers. The Office for Sponsored Programs, the University Director of Harvard's Federal Work Study program, and the University Financial Aid Liaison Office jointly issue this guidance to ensure compliance with FWS allowability regulations and with effort reporting requirements.

Who Must Comply

All Harvard University schools, tubs, local units, and University-wide initiatives must comply with this policy, particularly individuals involved with the administration and conduct of federally funded activities, including central and departmental sponsored project administrators and principal investigators.

Policy

Under Harvard's Federal Work Study Program, there are a wide range of restrictions regarding the levels of subsidies received. The restrictions depend on organization status, type of employment, etc. Because of the compliance risk associated with this highly variable restriction, Harvard disallows the use of federal funding, including cost sharing, as the institutional share of FWS.

Effort reporting requires the certification of the work performed by each individual during an identified period on federal awards. FWS salaries posted to Harvard's general ledger do not carry identifiers for individuals or for periods of work performed to allow for the required attestation. Since FWS is not able to be certified, it is unallowable.

Responsibilities

Principal Investigators (PIs) are responsible for ensuring that FWS costs are not charged to their federal funds or to their federal cost sharing activities.

Department/Local level managing units are responsible for identifying only allowable sources for the institutional share of FWS.

School/tub level managers of FWS programs are responsible for recognizing federal funds and disallowing their use for funding of the institutional share of FWS and communicating this policy to departments.

School/tub level managers of sponsored awards are responsible for ensuring that FWS costs are not charged to federal funds or used to meet federal cost sharing requirements and are responsible for removing them if they appear on federal funds or federal cost sharing activities.

Office for Sponsored Programs (OSP) is responsible for maintaining this policy and developing monitoring tools that identify FWS charges on federal awards or on federal cost sharing activities.

Student Employment Office (SEO) is responsible for ensuring that no federal funds are used to cover the institutional share of FWS and for implementing adjustments to the funding of federal work study requested by tubs.

Policy Exceptions

Exceptions to this policy would require manual effort certification and the prior approvals of the University Director of Federal Work Study Program and OSP's Director of Cost Analysis.

Definitions

Federal Funds: In Harvard's chart of accounts, funds starting with 1 are federal funds.

Contacts

Requests for adjustments to the funding of federal work study should be sent to the General Inquiries mail box seofwsp@fas.harvard.edu of the [Harvard University Student Employment Office](#).

Responsible Office

[Office for Sponsored Programs](#)

Revision History

- This policy was created in September 2019.
- This policy was revised in December 2020 to clarify that funding adjustments to federal work study requested by tubs are implemented by the Student Employment Office.

Related Policies and Guidance

- [Effort Reporting Policy](#)
- Guidance for the current year can be found in the [Federal Student Aid Handbook](#), Volume 6, Chapter 2.

Related Resources

- [Harvard University Student Employment Office](#)