**WSAC Guidance Letters, Response to COVID-19, 2019-2020**

**March 20, 2020**

Dear Colleagues,

 We’ve had a number of good questions from institutions on WSAC’s initial guidance with regards to State Work Study (SWS) and COVID-19 impacts.  This includes a request to pay remaining SWS awards as general financial aid instead of wages.

Following a careful review of SWS's primary purpose in assisting students with financial need in bearing the full cost of post-secondary education, and in consultation with the Attorney General's Office, WSAC is expanding our initial guidance through an emergency rule (see below) that **enables institutions to convert SWS awards to need-based financial aid.**

The Emergency Rule authorizes the following expanded (option 2) SWS 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.

The process for public colleges to request their remaining SWS allocation remains the same.

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

WSAC is committing to fund all remaining institutional SWS allocations.  We cannot commit to supplemental allocations at this time but are assessing that possibility.

**March 12, 2020**

We want to be as permissive/flexible as possible with colleges related to the COVID-19 situation but we also have some expectations that colleges have their own continuity of operations plan related to state aid administration.  This came up with one CTC yesterday. They asked for “regulatory relief that can be offered by WSAC regarding submission of files, requests for payments, return of payments, mandatory reports, etc.”  We essentially responded with, ‘tell me more.’  We need more specifics about the kind of impacts you anticipate. We aren’t trying to be meanies 😊 but we can’t just offer blanket “relief.” We are really wanting to have as much notice if there could be impact to state aid eligible students, as they could be in very vulnerable positions as need-base aid recipients. If we are looped in early, we might be able to help support or work on collaborative, creative solutions.

Also, FYI - Besides SWS questions, we are starting to get some related to incomplete grades and we are working on a response.

**March 11, 2020**

**If you haven’t already, we request a thorough review your own state aid processes, specifically your ability to request student aid payments from WSAC.** If you identify any potential disruptions for distributing state financial aid to students, please contact our office right away.

Below is a copy of the email I sent last week, which includes State Work Study (SWS) guidance.  Since sending, we have received a question about students working remotely.  That is permissible for SWS, assuming they can perform their necessary job functions remotely, and that they have as much remote supervision as possible considering the logistical challenges.

**Subject:** State Financial Aid - COVID-19

Dear Colleagues,

Knowing there are a few colleges that have temporarily suspended operations due to COVID-19, we wanted to reach out.  This is an ever-evolving situation primarily impacting King and Snohomish counties at this time.

We encourage you to contact [our office](mailto:wcg@wsac.wa.gov) ([WCG@wsac.wa.gov](mailto:WCG@wsac.wa.gov)) if you anticipate any impact to state aid programs or students.  We are monitoring events but know you have the more direct knowledge of potential student impacts.

Below is SWS guidance that was previously provided to State Work Study administrators for your reference.

For SWS employees who are unable to perform regularly scheduled work hours 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 program share of those hours as long as:

* The SWS employer is continuing to pay its employees in similar circumstances; and
* The SWS employer continues to pay its share of gross student wages for those hours

WSAC encourages equitable treatment of SWS employees.

Please note this guidance only applies to SWS.  Department of Education guidance on COVID-19 as it applies to the Federal Work Study (FWS) program can be found at the following link:

<https://ifap.ed.gov/electronic-announcements/030520Guidance4interruptionsrelated2CoronavirusCOVID19>