

Public Law 116-154, Section 6 Improvement to Work Study Allowance Program

PRESENTER _____

Kevin White
Work Study Supervisor
Muskogee VA Regional Office



Table of Contents

- Definitions
- Introduction
- 154-Administering Facility Responsibilities
- Non-154-Administering Facility Responsibilities
- VA Work Study Responsibilities
- Applying for PL 116-154
- Important Dates
- Contact Information and Resources



Definitions

The Department of Veterans Affairs Work Study (WS) benefit program provides part-time employment to students receiving VA education benefits who attend school at three-quarter time or more, or 75%+ rate of pursuit. This program provides the student an avenue to earn extra money while going to school and allows them to gain valuable work experience.

A 154 Administering Facility (154AF) (i.e. a facility administering WS payments through 38 U.S.C. 3485(a)(4), as added by PL 116-154) can be an approved education facility that has a Facility Code assigned to it, with students receiving GI Bill benefits at that institution (e.g. CH33, CH1606, CH35, CH31). These can be Institutions of Higher Learning (IHL), or Non-College Degree (NCD) facilities.

A Non-154 Administering Facility (non-154AF) is an approved VA WS work site that is not approved to administer the payment of Work Study benefits due to them not meeting the requirements of being an educational institution that has GI Bill students receiving VA Education benefits at that site. These include VA Regional Offices, VA Medical Centers, VA National Cemeteries, other VA Facilities, State Cemeteries, State Approving Agencies, Domiciliary Care Facilities, non-VA Facilities, and Vet Success Centers.



Definitions

VA Form 8690 Work Study Time Record – used to record dates and hours worked by the student during the corresponding contract period.

VA Form 8691 Work Study Application – potential WS students fill this form out in order to apply for WS benefits. VA will write contracts or deny based on GI Bill enrollment.

VA Form 8692 Work Study Agreement – also known as a contract; is an agreement between the student and VA informing them of student and VA responsibilities during the allotted contract period.

Work Site Position Description/Application (PD) – this form is filled out by a potential/current WS work site and sent to VA WS for dis/approval. Facilities are required to list the duties/tasks being performed by WS Students.

PL 116-154 Participation Form - Application required for any 154AF requesting lump sum payment approval. Facilities must reapply annually. This will be an official VA form.



Introduction

What is Public Law (PL) 116-154, Section 6, Improvement to Work Study Allowance Program? Added 38 U.S.C. 3485(a)(4) which allows a 154AF to pay WS 8690-Time Records for all students receiving GI Bill benefits at their facility, and non-154AF facilities.

Approved 154AF will be receive a lump sum amount which must be used to pay VA Work Study students only.

Academic year and funding: August 1st to July 31st.

Up to 25% of remaining lump sum payment can carry over from one academic year to the next.

154AF participation is voluntary.

Non-154AF is not voluntary. If a student is enrolled at an approved 154AF educational institution, and that same student is a Work Study at a non-154AF work site; that non-154AF does not have the option to opt-out of the 154AF certification and payment system.



154 Administering Facility Responsibilities

Complete and submit the PL 116-154 Participation Form within the open enrollment period.

Submit a PD to VA WS for review and dis/approval every year (if your 154AF has WS students working there).

Be aware and follow all pertinent laws, policies, and changes applied to the Work Study program.

Provide customer service to all non-154AFs and work sites your GI Bill students work at as a WS student.

Provide customer service to all WS students, at your 154AF and all non-154AFs your site handles.

Provide a Point of Contact for WS, who is a permanent employee of the 154AF.

VA WS receives and processes VA Form 8691-Applications, and extension requests for dis/approval of all WS students.

VA WS receives and processes all PDs.



154 Administering Facility Responsibilities

Pay students at both your 154AF, and non-154AFs, in a timely fashion. Payments must be processed within 5 business days.

Pay students who requested an advance payment in a timely fashion. The WS student presents the 154AF with their *8692-Work Study Agreement (Advance Payment)* form, in which the 154AF will process payment within 5 business days. The advance payment will be 50 hours X the approved rate. The 154AF is responsible for ensuring the first 50 hours worked on the 8690-Time Record are applied to this AP debt; as well as forwarding debt collection information to VA WS for those students who didn't work to pay back the full amount of the AP.

Only pay for time worked during the approved contract dates, at the approved work site, after receiving the signed 8692-Agreement.

Accept completed 8690-Time Records only from the Site Supervisor.

Be aware of State/Federal minimum rate changes, updating records and paying those rates.

Be responsible for collecting all debts. For example, the student was overpaid due to them terminating enrollment, yet they still worked and the 154AF paid the student past the month the student terminated.



154 Administering Facility Responsibilities

Immediately submit all processed VA Form 8690-Time Records, and VA Form 8692-Agreements, to the VA WS department (within 5 business days after processing).

Establish and maintain an internal control system of checks and balances that ensures no office can both authorize payments and disburse funds to students.

Have a report recording the name of the WS student, payment amounts, the associated Agreement Control Number (s), work site name, the account in which funds are being sent, GI Bill benefit used under that contract, and the dates those payments were made for all 8690-Time Records submitted to your facility for payment.

The 154AF must capture disbursements by individual VA Education Program Type (e.g. CH30, 31, 1606, 33 etc.) on all reports.

All Work Study benefits paid for a GI Bill student must be reported on the reconciliation report monthly.

Submit the End-of-Year Fiscal Report to VA Work Study by the due date.

The VA Work Study funds cannot be merged with amounts available for the general fund of the institution.



154 Administering Facility Responsibilities

The 154AF must establish and maintain program and fiscal records that:

- Include a certification by the student's site supervisor that each student has worked and earned the amount being paid. The certification must include or be supported by, for students paid on an hourly basis, 8690-Time Record showing the hours each student worked in clock time sequence, or the total hours worked per day;
- Include a payroll voucher containing sufficient information to support all payroll disbursements;
- Account for all WS funds in accordance with generally accepted accounting principles;
- Reflect each WS transaction
- Include general ledger accounts and related subsidiary accounts that identify each WS transaction and separate those transactions from all other institutional financial activities;
- Are readily available for review by the VA and follow the record retention and examination provisions in this part and in 34 CFR 668.24 (maintain funds received in accordance with the requirements in 34 C.F.R. § 668.163).

Note: Payment records should be reconciled at least monthly by the 154AF.



Non-154 Administering Facility Responsibilities

Submit all 8690-Time Records, and 8692-Agreements to the POC at the 154AF your WS student is receiving GI Bill benefits at, if that educational institution is a participating 116-154 facility.

Reach out to the 154AF customer service for any issues related to processing your 8690-Time Record or 8692-Agreement.

Send all 8691-Applications and zero hour/extension requests to VA WS for contract dis/approval.

Submit a PD to VA WS for review and dis/approval every year.

Reach out to VA WS for any issues you experience relating to the processing of your 8691-Application and zero/extension request or PD.

Non-154AFs are not permitted to opt out if the student's educational institution is an approved and participating 154 facility.



VA Work Study Responsibilities

Processing all WS Work Site Applications/Position Descriptions.

Processing 116-154 Participation Forms.

Processing Work Site Supervisor Update Forms.

Processing student applications, VA Form 8691-WS Application.

Processing student zero hour/extension requests.

Reconcile 116-154 participating 154AFs academic year payments.

Processing and paying all 8690-Time Records and 8692-Agreements for those WS students whose educational institution is not participating in PL 116-154 as a 154AF.



Applying for PL 116-154

Only 154AFs can apply to administer WS Time Record payments under 38 U.S.C. 3485(a)(4) (PL 116-154, section 6).

Non-154AFs send 8690-Time Records and signed 8692-Agreements to the educational institution their WS student is receiving GI Bill benefits, **if** that educational institution is approved to administer WS payments under 116-154.

154AFs will need to have a system in place for notifying their potential/WS students, as well as non-154AFs, that they are a participating 116-154 administering facility, and that all 8691-Time Records, and signed 8692-Agreements need to be sent to them.

PL 116-154 Participation Form must be submitted to VA WS within the enrollment period.

The Participation Form must have an estimate of the amount of lump sum money the 154AF will need to pay all WS students they have receiving GI Bill benefits at their facility.



Important Dates

Academic Year 2021 (8/1/21 to 7/31/22):

- Enrollment period for participation in AY 21: **May 1 - 31, 2021**
- Processing of 116-154 Participation Form by VA WS for AY 21: **June 1 - 30, 2021**
- Award notification to school for AY 21: **July 1, 2021**
- Funds disbursement to school for AY 21: **August 1, 2021**
- Participating 154AFs submit End-of-Year Fiscal Report for AY 21, remaining 8690s: **August 1, 2022, to September 30, 2022**

Academic Year 2022 (8/1/22 to 7/31/23):

- Enrollment period for participation in AY 22: **May 1 - 31, 2022**
- Processing of 116-154 Participation Form by VA WS for AY 22: **June 1 - 30, 2022**
- Award notification to school for AY 22: **July 1, 2022**
- Fund disbursement to school for AY 22: **August 1, 2022**
- Participating 154AFs submit End-of-Year Fiscal Report for AY 22, remaining 8690s: **August 1, 2023, to September 30, 2023**



Important Dates

Academic Year 2023 (8/1/23 to 7/31/24):

- Enrollment period for participation in AY 2023: **August 1, 2022, to September 30, 2022**
- VA WS provides school the proposed funding for AY 23 based on actual expenditures from AY 21 with consideration of 25% roll-over: **February 1, 2023**
- School must lodge any request for recalculation of proposed funding for AY 23:

March 1, 2023

- VA WS provides participating AF154 with final award amount for AY 23: **May 1, 2023**
- Funds disbursement to school for AY 23: **August 1, 2023**
- Participating 154AFs submit End-of-Year Fiscal Report for AY 23, remaining 8690s: **August 1, 2024, to September 30, 2024**

Each subsequent year:

- 154AF submits End-of-Year Fiscal Report, remaining 8690s, and 116-154 Participation Form (reports/remaining 8690s will be for the previous AY; and the Participation Form will be for the upcoming AY):

August 1st, to September 30th

- VA provides proposed funding: **February 1st**
- Deadline for school to request recalculation: **March 1st**
- VA WS provides final award amount for upcoming AY: **May 1st**
- Disbursement of funds – **August 1st**



Contact Information and Resources

- GI Bill Ask a Question Website -

https://gibill.custhelp.va.gov/app/utils/login_form/redirect/ask

- Site Supervisor Hotline –
1-855-225-1159, option #2

- Work Study students may call the Education Call Center –
1-888-442-4551

- [SCO Handbook - Work Study](#)

- Department of Labor Minimum Wage -

<https://www.dol.gov/agencies/whd/minimum-wage/state>