LSU

CAMPUS CORRESPONDENCE

Date: January 15, 2015

To: Vice Presidents, Vice Chancellors, Deans, Directors and Department Heads

From: Donna K. Torres, CPA
Associate Vice President for Accounting Services

Subject: Memo # AS-15-06
Implementation of FASOP: AS-25 "Student Employment Best Practices"

In response to the discovery of falsified timesheets in the spring of 2014, an action item our office was responsible for handling was the creation of an operating procedure for student employment. In an effort to consider the needs and requirements of various units, a Work Group was created consisting of personnel from administration, academic, research and auxiliary units. This group of employees collaborated to establish a set of procedures to define best practices for student employment.

All units/departments are required to develop a Student Employment Best Practices policy and related forms based on this FASOP. All Timekeepers, HR Contacts and Business Managers as well as supervisors of student employees should have a general understanding of their departmental policy on student employment.

Please forward this memo and FASOP to all staff in your area who play a role in the student employment process. Additionally, this FASOP will be one of topics presented at February's Business Managers' Meeting to be held on Tuesday, February 10, 2015 at 9:30 am in the Atchafalaya Room.

If there are any questions in relation to this FASOP, please contact Maria Cazes at mcazes@lsu.edu or (225) 578-2016.

Attachment

xc: Stuart Bell
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Student Employment Work Group

"This FASOP replaces originally distributed FASOP on 1/15/15".

Louisiana State University
Finance and Administrative Services
Operating Procedure

FASOP: AS-25

STUDENT EMPLOYMENT BEST PRACTICES

Scope: Louisiana State University

Effective: January 15, 2015

Purpose: To provide guidance to the campuses served by LSU's Office of Accounting Services on student employment policies and procedures. This FASOP is intended to establish consistency among employing units/departments, ensure departmental policies and procedures are clearly communicated and enforced, promote a culture of compliance and control, and encourage the continuous use of "best practices" regarding student employment. It is required that units/departments develop a *Student Employment Best Practices* policy and related forms based on this FASOP. Financial records of the University and policy compliance are subject to audit by the Office of Internal Audit and Louisiana Legislative Auditor (LLA). All Timekeepers, HR Contacts, and Business Managers as well as supervisors of student employees should have a general understanding of their departmental policy on student employment.

Introduction: The University recognizes that student employees can make contributions to the functioning of the University by performing some services that would otherwise be performed by full-time employees. Utilizing student employees not only provides these individuals with valuable work experience, but also allows the University to provide an invaluable introduction into the workforce in addition to a quality education. By employing students, LSU has an opportunity to brand its name as well as promote itself as a potential long-term employer to students upon graduation.

Resources: The University has policies that are applicable to this FASOP. The resources used to develop this FASOP that can be referenced are listed below:

- PM-8 "Definition of Student for Campus Employment Process"
- PS-21 "Graduate Assistantships"
- PS-25 "Nepotism"
- PS-26 "Policy for Persons with Disabilities"
- PS-33 "Student Employment"
- PS-67 "Misuse of Drugs or Alcohol"

Procedures: It is recognized that a student employee should be a student first and an employee second. The employment process and environment for student employees should be consistent with other types of employees since student employees are part of the university's workforce. The following guidelines and components should be considered when employing student workers and developing a student employment policy.

A. Eligibility for Student Employment
   1. Full-time Status – only full-time students can be employed by the institution as student employees.
      a. Undergraduate – a student who is enrolled in an undergraduate college for 12 or more semester hours of credit in the fall and spring.
      b. Graduate – a student who is enrolled in graduate school for 9 or more semester hours of credit in the fall and spring.

2. Good Academic Standing – student employees are required to be in good academic standing. This is denoted by a student not being on academic probation or warning and having a minimum overall GPA of 2.0.
3. Summer Eligibility – an undergraduate or graduate student can work during the summer if they meet one of the following requirements:
   a. Undergraduate – a student who is enrolled in an undergraduate college for 6 or more semester hours of credit in the summer.
   b. Graduate – a student who is enrolled in graduate school for 6 or more semester hours of credit in the summer.

   Students enrolled in summer courses are eligible to work a maximum of 20 hours per week once classes begin. Students not enrolled in summer courses, but who completed the prior spring semester as a full-time student and have full-time hours scheduled for the upcoming fall are eligible to work up to 40 hours per week. **Note: This FASOP is not a comprehensive document on all rules governing student employment and eligibility; see PS-33 "Student Employment" for complete guidelines and procedures.**

Full-time high school students and full-time undergraduates attending an institution other than LSU are eligible for student employment on the LSU campus. Students attending another institution must provide proof of full-time enrollment. Departments must attach the student's proof of full-time enrollment to the appointment form so that Student Payroll can review.

Any student under the age of 18 (between 14 - 17 years old) must have an Employment Certificate to work. The application can be found at http://www.laworks.net/Downloads/WFD/MinorApplicationToEmployForm.pdf. The student should complete their section, then give to the prospective employer to complete. A parent or legal guardian should then review and sign. The completed form should be brought to their high school official along with proof of age in order for the Employment Certificate to be issued. For students that are high school graduates, Student Payroll will issue the Employment Certificate. The student should bring the original Employment Certificate to their employing department upon being hired.

Once employed by LSU, students are required to notify the employing department of any change in their full-time status or in their academic or disciplinary standing at the institution. Note that good disciplinary standing is not used as criteria for student employment; however, if a student employee alters or forges official payroll documents or records, the student cannot be employed in a student worker position.

B. Chancellor's Student Aide Program (CSAP) and College Work Study Program (CWSP) Assignments

In February of each year, Financial Aid & Scholarships in the Office on Enrollment Management asks departments for their desired number of new student employees for the upcoming academic year. Copies of job descriptions should be sent with the request before assignments can be made. Every effort is made to fulfill all requests. Departments are notified in late May of summer assignments and in mid-August for fall assignments. CSAP assignments are provided for a fall and spring semester. CWSP assignments may start in the summer and can run through the spring semester. These students may begin working one week prior to the start of the fall semester. The last day for students to work for the academic year is the day of Commencement. Once CSAP/CWSP funds have expired, employment is not guaranteed (i.e., the student does not automatically retain their student worker position). However, if the department has funds available, the student can be paid from the department's budget. Since many departments rely heavily on CSAP/CWSP assignments, supervisors may want to remind these students that in order to receive this funding, they need to re-apply and accept the awards on an annual basis.

C. Application for Student Employment

Departments should have a Student Application or Information Sheet for all potential student employees to complete. The application or information sheet should include a date and the following information:
1. Student Information: name, LSUID, e-mail address, cell number, home address, campus address, emergency contact name and phone number.

2. Enrollment Information: Institution, number of hours enrolled, academic probation or warning status, cumulative GPA, classification (i.e., freshman, sophomore, junior, senior, graduate student), CSAP/CWSP assignment, anticipated graduation date.
3. Questions:
   a. Have you ever altered or forged official payroll documents such as timesheets?
   b. Have you ever been fired from a job? If so, describe the reason or circumstances.
   c. Have you ever been convicted of a felony? If so, describe the reason or circumstances.
   d. Do you currently have another student worker position on campus? If so, where and how many hours do you work?
   e. Are you related to any LSU employees? If so, provide names and relationships.
4. Student's signature and date.

Additional information on the application or information sheet that is relevant and applicable to the department's needs may be requested. Examples include proposed work schedule, work history, experience and references, availability for summer employment, availability for full-time employment between semester breaks, availability to work nights/weekends, who referred the student to the department, etc.

Private or sensitive information such as citizenship/work permit status, age, gender, etc. should not be used as a consideration for employment. Departments should be mindful when requesting this information on a Student Application or Information Sheet and not use this information in making employment decisions. Such information is discussed in various sections throughout this FASOP although it may not be required to be provided by the student employee until the appointment process (see Section J – Appointment of Student Employees).

The Age Discrimination in Employment Act protects workers by prohibiting discrimination against workers age 40 and over in any employment or employment-related decision. Departments should limit its request for the date of birth to a background check authorization form, if one is necessary. If a student is hired, then the date of birth can be obtained during the I-9 verification process.

D. Falsifying Payroll Documents and Legal Consequences

Any student that has altered or forged official payroll documents such as timesheets is not eligible for student employment. Students who have been determined to have falsified timesheets will be terminated after investigation and will not be allowed to hold future student employment positions with the University, including graduate assistantships.

PM-76 "Detection, Reporting and Investigation of Incidents of Financial Irregularity" was implemented effective August 1, 2014. This policy assigns the responsibility for reporting and investigating incidents of financial irregularities. LSU's management is responsible for the prevention and detection of financial irregularities and for ensuring that proper internal controls are in place to reduce the risk of such conduct. Known or suspected financial irregularities should be reported in any of the following ways:

1. Report to immediate supervisor; or
2. Direct notification to the Office of Internal Audit; or
3. Notification to an LSU administrator; or
4. Anonymous telephone call (1-855-561-4099) or internet report at www.lsu.ethicspoint.com to the LSU Ethics and Integrity Hotline.

Any supervisors receiving a report should immediately notify the Office of Internal Audit.

The Office of Internal Audit has the responsibility of responding to and investigating financial irregularities. Internal Audit, in coordination with General Counsel and the CFO, determines whether or not to request assistance of law enforcement. Upon conclusion of investigation, Internal Audit notifies the District Attorney (DA) and Louisiana Legislative Auditor (LLA) as required by R.S. 24:523.

E. Selection of Student Employees

Departments will hire student employees based on work needs and budget availability. A department should utilize its CSAP/CWSP assignments to allow those students the opportunity to utilize their funding. It also affords the departments some flexibility in spending its budget dollars. Note that CSAP/CWSP assignments do not guarantee student employment in a department as some units may choose to conduct a short interview. Other factors that may be considered when hiring student workers are the student's major, proposed work schedule, and availability during the summer or peak times for the department. CSAP/CWSP assignments that cannot be placed will be referred back to Financial Aid & Scholarships to be re-assigned.

It is very common for some departments needing administrative support to hire students based on the number of hours they are available to work. For example, some departments may hire students based on their ability to work in 1-2 hour increments, a minimum number of hours per week (for example, at least 10 hours) or closer to the maximum allowed (15-20 hours per week).

The University will enforce nepotism provisions of the Code of Ethics and employment of immediate family members. See PS-25 "Nepotism" to review LSU's nepotism policy and definition of immediate family members. Specifically, be aware that no member of the immediate family of any administrator may be employed within that individual's administrative area, whether or not intervening levels of supervision are present between the administrator and the immediate family member.

F. International Student Employees

International Services (IS) advises LSU nonimmigrant students regarding F-1 and J-1 (student) employment regulations. Employment eligibility for international students is contingent upon the student maintaining their lawful student status. An IS approved work permit is required in order for an international student to be employed and once the student completes and submits the work permit and I-9 forms, these forms are electronically routed to IS for their approval. Both forms must be current throughout the student's employment; therefore, they must be renewed when expiring. Employment can be terminated if the conditions of the on-campus work permit are not approved or are violated.

International students who have not worked in the U.S. before will need to apply for a U.S. Social Security number (SSN) for employment. Before applying for an SSN, the student needs to be in the U.S. for a minimum of 10 days after completing IS check-in, either at international student orientation or in 101 Hatcher Hall. When the student goes to the Social Security office, the student must provide proof of LSU campus employment and Designation School Official (DSO) authorization which will be in the form of a combined letter. This letter includes an original, official job letter from the hiring department and authorization from IS. The department will need to prepare this one-page letter on LSU letterhead and give it to the student - an example can be found at this link: http://international.lsu.edu/IS/pdf/DSO_Request_SSN_Example.pdf. The student will bring this to IS to complete along with the form found at this link: http://international.lsu.edu/IS/pdf/DSO_Letter_Request_Form.pdf, so that IS can prepare the DSO authorization. The student will be alerted when they can pick up the documents, and then go to the Social Security office, located at: 5455 Bankers Avenue, Baton Rouge, LA M-F 9:00 am – 4:00 pm.

International students who are eligible for student employment are not allowed to work over 20 hours per week and are not eligible for additional compensation except during official university breaks and holidays. Hours are monitored and letters are sent to students who violate the restrictions. Employment can be terminated due to violations of this rule.

G. Student Employees with Disabilities

The American with Disabilities Act (ADA) regulations regarding employment for student workers may apply. A student employee should request accommodations through their employing unit and the Office of Human Resource Management. Per PS-26, "In all cases in which a reasonable accommodation is requested, the University representative receiving the request is required to contact HRM for assistance in handling the request."

H. Supervisor's Responsibilities

The supervisor is responsible for the following student employment matters:

1. Having a sufficient understanding of this FASOP and its associated policies and procedures.
2. Selecting and/or interviewing potential students.
3. Informing Timekeeper, HR Contact and/or Business Manager of start date and end date of student employment and determining starting rate of pay.
4. Reviewing job description and office policies with student, setting work schedule, explaining payroll schedule (timesheets and paydays), developing a training plan including all state mandated trainings, determining and coordinating security access including the establishment of a mainframe id, if duties warrant access to financial systems.
5. Actively monitoring student work.
6. Reviewing and approving timesheets, then submitting timesheets to Timekeeper.
7. Supervisors should be advised and trained of the proper way to estimate hours worked when student timesheets are due early due to holidays and/or emergency closures.
8. Administering annual performance evaluations.
9. Reviewing a list of student workers (provided by the Timekeeper) each semester to ensure all students are still actively employed in their section. Supervisors noticing employees no longer working in their section should notify the Timekeeper immediately.

I. Timekeeper's, HR Contact's and/or Business Manager's Responsibilities

Each Department Head with fiscal authority for a unit should determine the responsibilities and security access between a Timekeeper, HR Contact and/or Business Manager and ensure proper training is arranged. Some units may have one individual who serves in all roles or an individual(s) with the ability to serve in multiple roles due to providing back-up support. Internal procedures should be considered when duties are assigned to ensure proper segregation of duties. Some of the key responsibilities that a Timekeeper, HR Contact, and/or Business Manager are accountable for include the following:

1. Have a sufficient understanding of this FASOP and its associated policies and procedures.
2. Maintain consistent communication with all supervisors of student workers.
3. Monitor Payroll Schedules to ensure timesheets are delivered by the published deadlines.
4. Timekeepers should only accept completed timesheets from the student employee's supervisor or other appropriate individual and never directly from the student employee.
5. Timekeepers, HR Contacts, and/or Business Managers should be advised and trained of the proper way to estimate hours worked when student timesheets are due early due to holidays and/or emergency closures.
6. The Employee/Supervisor table in HRS should be utilized and a student's supervisor should reflect their actual direct supervisor(s) - the supervisor(s) who is/are in charge of signing the student's timesheet. If the student has multiple jobs on campus, then the student should have dual supervisors in the Employee/Supervisor table in HRS.
7. The Business Manager should obtain the "Supervisory Report" under the Personnel Reports section of Reporting Tools by semester, at a minimum, and distribute to all supervisors of student workers. For any students identified as no longer active under that supervisor, the Timekeeper should research the student's current status and employing unit. If the student has transferred to another job on campus, then the supervisor in the Employee/Supervisor table in HRS should be updated. If the student is no longer working as a student employee at LSU, a separation date from the direct supervisor should be obtained. The Timekeeper should separate the student immediately and ensure the student has not been paid any wages after their last day of work.
8. Timekeepers should have designated back-ups that are thoroughly trained and versed in payroll and timekeeping policies and procedures on student employment. The back-ups should have appropriate security access to perform these duties in a Timekeeper's absence.

J. Appointment of Student Employees

When a student is selected for employment, the supervisor should forward the Student Application or Information Sheet to the Timekeeper with the appropriate account code and start date. It is recommended

that the student be sent an e-mail from the HR Contact with some basic employment information so that the student knows what to expect regarding employment paperwork, state mandated trainings, parking permits, etc.

Upon appointment, a student employee may be required to provide private information such as citizenship (to determine if a work permit is necessary), date of birth (to determine if an Employment Certification is necessary if the student employee is under 18; obtain a myLSU ID), etc.

K. Student Employment Paperwork

A Student Application or Information Sheet is required to start the hiring process. Once a student has been selected to be hired, he/she will be required to provide proper ID for I-9 verification upon the first three working days of employment. Students are required to submit other forms electronically via myLSU. Students are required to participate in direct deposit for payroll purposes. It is recommended that students be provided a copy of the department's *Student Employment Best Practices* policy which contains information included in this FASOP specific to the employing unit.

L. Security Access

A student's supervisor should determine what security access is appropriate for that student's job duties. The supervisor should determine and initiate the security access including the creation of a mainframe ID, if necessary. Security access in third party systems should also be coordinated by the supervisor. A supervisor should also handle any type of security or ID badge required for building access. This responsibility can be delegated to a Timekeeper or HR Contact if deemed appropriate.

M. Training

All mandated changes to departmental, University and state training requirements and trainings relevant to a student worker's job duties should be monitored on an annual basis.

1. Each student is required to complete mandatory trainings on Ethics, Sexual Harassment, and Title IX and Sexual Misconduct Training. These trainings are annual requirements and must be completed by December 31st of each year.
2. Students who drive a state vehicle (including golf carts) are required to complete a DA-2054 annually and complete an online Defensive Driving Course every three years. Copies should be maintained in the students' personnel file and originals should be forwarded to Property Management. Students are not allowed to use their personal vehicle for state business. If a student is involved in an accident or work related incident on or off campus, the student will be required to be drug and alcohol tested depending upon the employee's control of circumstances leading to the accident. Per PS-67, supervisors should direct questions about which screenings are appropriate for a given accident/incident to Administrative Services and Risk Management (ASRM).
3. Additional trainings deemed appropriate due to the nature of the job duties may be required. Such trainings should be approved in advance by the student's supervisor and possibly coordinated by the supervisor. All trainings should be taken outside of the student's class schedule. If attendance for training is outside scheduled working hours, then the student should be paid for their time spent in the training. These hours should be considered when setting the work schedule for that particular week.

N. Multiple Jobs on Campus

Student employees may be employed by more than one department with approval from Financial Aid & Scholarships. However, the limitation of only working 20 hours per week while school is in session applies. Students are required to inform their supervisors if they are working multiple jobs on campus and should inform their supervisor of their work schedule in the other department. It is the student's responsibility to track hours worked between the two placements and ensure they are not working in excess of 20 hours per week.

O. Job Description

Each student employee should be provided a job description listing duties specific to their position. If the position is a CSAP/CWSP assignment, the job description should be on file with Financial Aid & Scholarships. If abnormal or special requirements are necessary such as physical labor, travel, working nights/weekends, then this should be documented in the job description.

P. Rate of Pay

A student employee's starting hourly rate should be at least minimum wage but no more than the hourly rate allowed per PS-33. Some units may deem a higher rate of pay is appropriate. Such examples are when a job is not located on campus, education or experience is required, hours worked are on nights/weekends, or physical labor is required. Students working in excess of 40 hours in a week must be paid at a rate of 1.5 of their hourly rate for any hours worked in excess of 40 hours. However, the unit should have a policy in place requiring advance approval for overtime and should never occur during a normal week while school is in session.

Q. Professional Standards and Expectations

Each unit should set professional standards and expectations for their student workers to ensure consistency among divisions in large units. Treating student workers as professionals prepares students as they enter the workforce after graduation by developing their "soft skills" (i.e. ethics, attitude, emotions). This also affords LSU the opportunity to brand itself since faculty and staff often mentor students. Examples of standards to consider are: dress code, cell phone and internet usage, use of office equipment for personal use, ability to listen to radio or use ear buds, taking lunch and breaks, doing homework during work hours, tardiness, etc.

R. Dress Code

The employing unit should determine the appropriate dress code and convey this to the student worker upon employment. The dress code should correlate to the business environment and type of work the student is performing. If the department requires specific attire or uniform to be identified as a departmental representative, then the department's policy should include details on the issuance of uniforms and what clothing is considered appropriate.

S. Confidentiality Agreement

In many instances, student workers come across or have access to personal information or sensitive data related to LSU's faculty, staff, and students or sensitive information related to LSU's policies, personnel, and finances. This may include, but not be limited to, payroll information, SSNs, addresses, phone numbers, personnel matters, health information, etc. It is recommended that a Confidentiality Agreement be developed and signed by each student worker during the hiring process. For some student workers, this may also include information where confidentiality is required under HIPPA, FERPA, NCAA, etc. The signed agreement should be maintained in the student's personnel file.

T. Work Schedule

Student employees working on campus should not be allowed to work more than 20 hours per week during the fall and spring semesters. A supervisor may submit an appeal to Financial Aid & Scholarships for a student to work up to 25 hours per week. Students enrolled in summer courses are eligible to work a maximum of 20 hours per week. Students are not allowed to work during their scheduled class times. Students not enrolled in summer courses are not subject to the 20 hours per week limitation and can work up to 40 hours per week if they have completed the prior spring semester as a full-time student and have full-time hours scheduled for the upcoming fall.

U. Absences & Tardiness

Each student worker has a work schedule that has been developed in conjunction with their supervisor. Many units rely heavily on student workers for daily operations, so student workers are expected to work this schedule. However, it is understood, that some flexibility should be exercised by each employing division to allow for exams, special projects, semester breaks, etc.
A unit should establish a procedure to address when a student worker is going to be tardy or unable to report to work that day. The procedure may include that student attempting to find coverage for their shift. The procedure should also include exactly who to contact along with contact information and what type of communication is sufficient (phone call, e-mail, text).

V. Lunch and Breaks

Students working a full day (8 hours) are allowed the same breaks as full-time employees – a 15- minute morning break (paid), a 30-minute lunch (non-paid), and a 15-minute afternoon break (paid). The 30-minute lunch break should not be recorded as time worked on a timesheet. Students working continuous 4-hour periods are allowed a 15-minute break (paid) and should be taken approximately in the middle of the work shift. The length of time worked before having to take a lunch break should be set by each department. For students under 18, if the work period exceeds 5 hours, a 30-minute lunch (non-paid) must be taken.

W. Timesheets

Each unit should develop some type of time tracking system to track when a student worker arrives, takes lunch, and leaves their work shift. Some units have electronic systems in place. For those who do not, it is required that the AS107 "Student Employee Timesheet" is utilized. The student worker should maintain their time by signing in and out in the presence of their supervisor each day. Ensure the actual hour and minute of arrival and departure is captured (e.g., do not round to the nearest quarter hour). The timesheet should be under the control of the supervisor – never the student worker. At the end of the pay period, the student should verify the total hours worked and sign the timesheet. Any discrepancies should be discussed immediately with the supervisor prior to the supervisor approving the timesheet and submitting it to the Timekeeper. All signatures on timesheets should be signed in blue or black ink. Students should never be responsible for submitting timesheets to the Timekeeper. When a supervisor (or any other employee with direct knowledge of a student's hours worked) is unavailable to sign a timesheet, the Timekeeper should scan a copy of the student's timesheet to the supervisor and obtain an electronic approval via e-mail. The Timekeeper should sign the supervisor's name and initial the timesheet and attach the approval e-mail to the timesheet. Only someone with direct knowledge of a student's hours worked should approve a timesheet.

X. Performance Evaluations

It is recommended that units develop a process to conduct annual performance evaluations for student workers. Evaluations should be conducted either annually for all student workers or on each student worker's anniversary date of employment. An evaluation form should also be designed to assess the student's performance for a specific period. Areas of responsibility that are suited to that department or work environment should be defined for the evaluation form then rated or scored. Examples may include attendance, work habits, accuracy, organizational skills, creativity, etc. The appraisal instrument is intended to serve as a guide to the job performance of the student worker relative to other student workers in the department. This instrument will also be used as an aid in determining whether or not a student worker should be retained and in making a wage increase recommendation. Copies of performance evaluations should be maintained in the student's personnel file for future reference.

Y. Merit Increase Plan

Provided budget funds are available, units may establish and implement a merit increase plan for student workers. The department's merit increase plan should govern the factors that determine the merit amount. It can be determined by the performance evaluation rating, length of employment, additional education/training

attained, etc. It is recommended that the merit increase plan include a statement that in cases of a budget crisis, the merit increase plan may be temporarily suspended until further notice.

Z. Separation Procedures

Student employees may be terminated at any time. When a student worker is separated, the supervisor should immediately inform the Timekeeper so that a separation form can be initiated. Supervisors are also responsible for removing all security access the student employee was given upon employment (see section "Security Access").