Student Employment

Supervisor's Manual

Financial Aid
studentjobs.richmond.edu

Fall 2021

Revision 6

Hiring Cheat Sheet-(regular hourly job)

- ➤ WHAT THE SUPERVISOR NEEDS TO DO UPON HIRING A STUDENT
    - • Submit an Electronic Personnel Action Form (EPAF) in Bannerweb to Student Employment
    - • Know when you can start working your student
        - • Those who **HAVE worked on campus before**—can start right away
        - • Those who **HAVE NOT** (new student employees)
            —Tell your student to bring their **original** social security card, passport, or birth certificate and a photo ID to Student Employment/Financial Aid to complete employment paperwork (see I-9 requirement pg 17) **before** beginning work. (Int'l students must go to the Office of International   Taxation x6007). Students will be issued a Release to Work form when done.
            —You must wait for a Release to Work form before the student can begin work. The university can be fined $1000 per student per day the employee works illegally.
    What if you don't know? The EPAF process can tell you if a student has worked before and Student Employment will send you an email notifying you if the student needs to come in to fill out paperwork.

- ➤ Once the student has completed all requirements, Student Employment...
    - • Processes the EPAF and the status changes to Approved or you receive the Release to Work form. Either one is a notification that you can work the student.
    - • An EPAF status of Completed – the student should now be able to access BannerWeb to enter their time on web time entry. The student needs to submit their time to the supervisor for approval by 10am on the Monday following a pay period and the supervisor needs to approve it by noon on the same Monday.

Contact Information and Office Hours (Subject to Change)

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Office Hours: M – F   8:30am - 5:00pm
Students can complete pre-employment paperwork in the Financial Aid Office

Please note: Time submittal, paychecks, and W-2 issues are handled by the
Payroll Office in Maryland Hall, x8171.

Student Employment Supervisors Manual - Revision 6
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Student Employment Overview

Statement of Purpose

The purpose of the Student Employment program is to coordinate the various components of the program at the University of Richmond. Student Employment is a component of the Financial Aid Office which also works closely with the Payroll Office, Human Resource Services, International Education, the Office of International Taxation and the Career Development Center. The Financial Aid Office/Student Employment, hereafter referred to as Student Employment, facilitates the hiring process for students seeking on-campus employment and ensures adherence to pertinent employment laws and Federal Work-study (FWS) regulations.

Office Responsibilities

The Student Employment program is responsible for:

- Ensuring adherence to federal and state employment laws
- Ensuring adherence to Federal Work-study (FWS) regulations
- Advertising on-campus employment opportunities
- Planning and organizing the annual on-campus Student Job Fair
- Reviewing all Electronic Personnel Action Forms (EPAFs) in Bannerweb for accuracy and completeness
- Pulling the EPAFs from Bannerweb to Banner to set up new student jobs
- Notifying student supervisor contacts (hereafter referred to as supervisor) of students who need to complete pre-employment paperwork
- Processing non-international student pre-employment paperwork and maintaining a central file of tax & I-9 forms, EPAFs and any performance evaluation/termination information which is received
- Monitoring and reviewing student pay rates to ensure equity and continuity campus wide
- Monitoring FWS earnings to ensure students' earnings do not exceed FWS eligibility
- Monitoring departmental FWS student employment budgets
- Providing employment verifications for previous and present student employees

Student Employment Website

Student Employment maintains a website on which the most current information relating to student employment is posted, including current job openings. This website can be found at studentjobs.richmond.edu. It is designed to provide information for both student employees and supervisors and together with this handbook is the primary source of up to date information on all student employment related questions and policies for supervisors.

Student Employment Program Structure

<u>Student Employment Programs</u>

The University of Richmond has two Student Employment programs: the **Federal Work-study (FWS)** program and the **University Work Program (UWP)**. The primary difference between the two programs is that the FWS is partially (75%) supported by federal funds, and students earning these funds must be qualified to do so through the Financial Aid Office, whereas UWP is fully funded by the University of Richmond and/or grants. Students who did not apply for, who did not receive an FWS award, or have already earned all of their FWS award for the year will automatically be employed under UWP. Each program has its own specific account number to be used in conjunction with each departmental index. As supervisors are hiring students, it is important to distinguish between the two student employment programs and to adhere to the guidelines for each.

Federal Work-study (FWS) Program – (Account –6312)
FWS funds are used to pay student employees who have been awarded FWS money as part of their need-based financial aid package. The Financial Aid Office determines a student's eligibility to earn FWS funds, and determines the amount the student may earn. Not every student receiving need-based financial aid receives FWS funds as part of his or her aid package. Nor are students receiving FWS funds guaranteed a job; they must secure employment by one of the methods available through Student Employment. It is important to note that FWS funds may only be used during the academic year payroll schedule.

Students working under FWS may earn only the amount stipulated in their FWS award. During the hiring process, supervisors should ask FWS students if they are working any other jobs on campus since their earnings limit will be met by combining the total pay received from *all* on-campus jobs. Students *cannot* continue to work under the FWS program once they have reached their FWS earnings limit (unless the award is increased by the Financial Aid Office), but Student Employment will notify supervisors when FWS students have met their FWS earnings limit, and will switch students from FWS to UWP, if the department has UWP budget to pay the student. Otherwise, the student will need to be released from their position and may be replaced with another student who has an unearned FWS award. After a student has met his or her award, s/he can earn UWP in any department with available UWP funds.

A list of students who are eligible for FWS is distributed to supervisors in the summer prior to the fall semester. If a student is on the FWS list, supervisors should use the appropriate account number (-6312) on the Electronic Personnel Action Form (EPAF) in Bannerweb which sets up a new student job. The list of FWS students can change during the academic year as students receive or decline FWS packages. Therefore, Student Employment will maintain the most current list and will change the account number on EPAFs, if necessary. Supervisors must make note of any changes in account numbers as the EPAF status changes to "completed" because any changes to the index/account number will affect your budgets.

University Work Program (UWP) – (Account –6311)
Students who did not apply for, who did not receive an FWS award as part of their financial aid package, or have already earned all of their FWS award are paid from UWP funds. UWP is primarily funded by the University of Richmond and does not place limits on the amount of money a student may

earn. All students working during the summer payroll schedule are paid under UWP accounts since FWS funds are only used during the academic year. If a student is not listed on the FWS list provided by the Financial Aid Office, supervisors should use the UWP account number (-6311) on the EPAF. Account number -6413 is reserved for students being paid from an index starting with CS, 27, 28 or 29xxx as they are Federal, State or private grants.

<u>Eligibility for Student Employment</u>

General Eligibility Criteria
Students enrolled in any of the academic schools at the University of Richmond are eligible to work through the student employment program as long as they are enrolled on at least a half-time basis (usually 1.75 units or six credit hours). Students cannot be classified as Non-Degree Seeking (NDS) in Banner unless they are international exchange students who are seeking a degree in their home school. Students in the School of Professional and Continuing Studies (SPCS) must be enrolled in a degree or academic certificate program and be enrolled on at least a half-time basis (usually six credit hours) to be eligible to work through the student employment program.

When a student is no longer enrolled at the proper level (graduates, withdrawals, low enrollment), s/he is no longer eligible to work under the student employment program due to FICA exemption laws. But, because students are not exempt from paying FICA taxes during the summer payroll period, there are some exceptions to the enrollment requirements.

- students who wish to work in the summer do not have to be enrolled in summer classes as long as they were adequately enrolled during the previous spring semester. May graduates can therefore work the summer after they graduate.

  or

- students do not have to be enrolled in summer classes as long as they will be adequately enrolled in the following fall semester. Entering freshmen can therefore work the summer before they start school.

International students cannot work at all after their program is over or they graduate unless OPT has been approved by International Education.

Be careful **not** to assume that a student can always work one semester after they graduate. This is not true. If a student graduates in December, they <u>cannot</u> work the following Spring. Also, if a student withdraws mid-semester, they must be terminated at the end of the applicable payroll period.

The Financial Aid Office recognizes the priority that academic responsibilities must take in the lives of student employees. Therefore, students on academic probation are encouraged not to work on campus during the time of their probation.

International Student Eligibility

Non-Immigrant Visa Holders (NIVH) students must receive written permission from the Office of International Taxation to be eligible to work on campus. To be approved to work on campus, the student will be issued written authorization, which stipulates the maximum number of hours the student is allowed to work each week (typically 20 hours/week during the academic year). The steps that the

NIVH student must take to be allowed to work on campus are delineated in the International Student Employee section of this manual, and on the Student Employment website, International Students link.

NIVH students are strictly limited to working 20 hours per week while school is in session and 40 hours per week during official school and summer breaks (see the Student Employment website, International Students link for partial week limits). While it is the student's responsibility to adhere to the correct number of weekly work hours, supervisors are encouraged to assist in this effort as they determine work schedules for their NIVH student employees. Graduating NIVHs can only work through graduation day unless they are authorized by the Office of International Education to use their post-graduation Optional Practical Training (OPT) to work. Exchange students finishing their last semester can work only through the last day of the semester.

In order for an international student to be authorized for employment, the student must complete data entry information in FNIS (link provided by OIT) and the supervisor must email OIT confirming employment – listing department, job title and start date. Prior to beginning on-campus employment, the student must meet with OIT to sign employment and taxation paperwork, bringing to the meeting a passport with USCIS visa entry stamp, visa (I-20 or DS-2019), electronic I-94 card printed from the USCIS website, and the visa work authorization letter signed by Krittika Onsanit in International Education. A student who begins working on-campus prior to meeting with OIT is deemed to be working illegally in the United States; a status which can lead to deportation. OIT will provide information on how to apply for an SSN as this requires the student to go the Social Security Administration office to apply in person. The SSN card is usually mailed out 1-2 weeks after the application is submitted. Once the SSN is received, the individual must return to OIT and present the SSN card. Please note, while an individual may work and be paid before the SSN is issued, the IRS has been denying tax refunds to individuals who file income tax returns without an SSN.

Student-Athlete Eligibility

Student-athlete employment is governed by NCAA Bylaw 12.4.1. This rule permits student-athletes to be employed both on- and off-campus under the following conditions: (a) compensation must be paid only for work actually performed; (b) compensation must be at a rate commensurate with the going rate in that locality for similar services; and (c) compensation may not include any remuneration for value or utility that the student-athlete may have for the employer because of publicity, reputation, fame or personal following that he or she has obtained because of athletics ability. The NCAA no longer places a cap on the amount of money a student-athlete may earn, and regulations apply to all student-athletes (scholarship and non-scholarship) equally. As long as the employment meets the aforementioned conditions, it is permissible.

To confirm compliance with NCAA rules, student-athletes must report their employment to the University's Athletics Compliance Office *prior* to beginning an on- or off-campus job. The student-athlete must complete an electronic form through JumpForward.com which is then e-signed by the student-athlete and compliance personnel.

Please note that adherence to the NCAA regulations is the responsibility of the student-athlete, but is coordinated by the Athletics Compliance Office within the Athletics Department. Compliance with NCAA rules is of the highest priority for the Department of Athletics and the University of Richmond. Please contact the Athletics Compliance Office if there are specific questions regarding student-athlete employment.

Departments are responsible for maintaining a file of job descriptions for all student jobs in their department. Supervisors must ensure that each student job has a corresponding job description that adequately describes the job duties and qualifications required. Job descriptions are used to clarify the supervisor's expectations of the student employee as well as to determine the most appropriate pay rate for the student job. Federal law also requires that all FWS positions have job descriptions. Supervisors should review their student job descriptions yearly to be sure that they accurately reflect the student job being performed.

To create a new job, supervisors should use the two generic job descriptions listed below as a guideline to determine the appropriate grade level of each position. A blank template is available on the Student Employment website. A new job description must be created and kept on file before hiring a student for that position.

Student Wage Rate Structure and Wage Changes

The student wage rate structure was created in an effort to provide a comprehensive and equitable basis for classifying student jobs. The rate of pay assigned by a department to a student is based on the specific responsibilities of the job the student will perform as stipulated in the specific departmental job description as well as the student's level of experience with the specific responsibilities and qualifications of that job description. For this reason, it is crucial that the job descriptions remain accurate and that the correct job title is used on the Electronic Personnel Action Form (EPAF).

Basic Wage Rate Structure
There are four grade levels that each have an hourly rate range for student employees. The classification criteria for each of these levels are listed below. Current wage rates are also listed on the Student Employment website.

- Level I - $11.00 - $13.00; Effective August 21, 2022, Level I - $12.00-$13.00

    Position Summary:
    > Performs tasks utilizing skills and knowledge that can be learned on the job, some independent decision-making in areas with low-to-moderate accountability, moderate level of responsibility and judgment for a variety of tasks, and tasks may be manual and/or repetitive in nature. Sound judgment in supervisor's absence, and general instruction from a supervisor with little follow-up required. Specific tasks will vary depending on departmental position.

    Responsibilities include but are not limited to:
    - Assist with on-campus errands and projects
    - Perform routine and repetitive departmental tasks
    - Perform required duties and responsibilities with minimal supervision
    - Provide excellent customer service; respond to questions, concerns, or complaints in a
    - proactive manner
    - Maintain organization and cleanliness in areas of employment; perform periodic checks on
    - supplies, materials, procedures, outcomes, equipment, facility, etc.
    - Assist with day to day functions of department

- Once trained, Operate University property, equipment, vehicles, software and hardware without
- supervision
- Perform other duties as assigned

Qualifications include:
- Knowledge of services performed and provided by office/department
- Willingness to expand knowledge beyond basic job duties and skills
- Attention to detail and high level of organization
- Ability to balance and prioritize a high volume of departmental tasks with customer service-related work
- Possess effective communication skills; ability to deliver customer service in a friendly and helpful manner
- Ability to maintain confidentiality and discretion working with sensitive and private information
- Ability to work independently
- Ability to interact with all levels of staff, faculty, customers, and community
- Experience with and/or ability to learn various software programs, equipment, or tools necessary to perform job preferred but not necessarily required

- Level II - $13.00 - $15.00

  Position Summary:
  This position requires skills beyond those typically expected of an undergraduate student. May exercise supervision and/or training of other student workers. Responsible for highly complex tasks. May need specialized certification and/or training. Independent problem-solving and critical thinking abilities are necessary to perform duties. Strong initiative and decision-making abilities required in planning and prioritizing personal workload and the work of other student employees. High accountability from management and public is experienced. Work with minimal supervision while providing leadership and management of projects and/or other student workers is expected.

  Responsibilities may include but are not limited to:
  - Exercise good judgement and independent decision making
  - Act as a knowledgeable resource to/for other student employees, delegating work when appropriate, and being an example while providing excellent customer service
  - Serve as point of contact to resolve customer service challenges, especially during emergency situations
  - Demonstrate proprietary knowledge in a subject area of expertise; plan, create, and oversee the dissemination of information to targeted audiences
  - Recruit and/or train other student assistants
  - Manage opening and closing of facility when full-time staff not present; manage other student assistants with regard to scheduling, work flow, monitoring of job performance, and take corrective action when needed
  - Manage all facets of program planning and performance including: advertising, logistics, program agenda, and reporting; collect and report data as related to position
  - Ability to implement and enforce policies and procedures
  - Perform other duties as assigned

Qualifications include:
- Act as an innovative and creative thinker
- Excellent interpersonal and written/verbal communication skills with high levels of detail
- Ability to work as a leader within a diverse population and to maintain confidentiality and demonstrate strong judgement
- Superior administrative and organizational skills with ability to meet all deadlines
- Ability to work independently/work without supervision to meet all deadlines and output quotas
- Knowledge of subject matter and/or departmental operation required
- Possess knowledge of specialized job requirements, such as software program, equipment operation, certification, etc.
- Possess advanced knowledge of departmental policies and procedures, work flow, and daily activities and able to make recommendations for improvement of these items
- Demonstrate leadership and supervisory/management skills
- May require specialized certification or training

Wage Rate Changes/Merit Increases

If a department or supervisor determines that a student is deserving of a pay increase they are able to change an individual student's wage rate to another wage rate within the Pay Grade level's range by submitting a Wage Rate Increase EPAF. The rate change will go into effect based on the effective date chosen in the EPAF by the supervisor and must be after the student's last paid date for that job. Please note that we will not change wage rates and request back pay for previous pay periods that have already been processed. It is up to the supervisor to submit the EPAF at least 1 day before the pay period closes or else the new rate will go into effect in the subsequent pay period regardless of what has been communicated to the student.

Student Grade Level/Range Increases

Periodically Student Employment determines if the overall student wage rate structure should be increased to reflect market adjustments or minimum wage increases. This decision is based on University staff pay rate increases as well as the pay rates for similar jobs off campus. Neither a cost of living nor market increase is guaranteed each year. Rather, they are given when necessary to keep the on-campus student pay rates competitive both internally and externally. Notification of these increases (when applicable) is   made in writing to the supervisor and is normally implemented at the beginning of a new fiscal year or fall.

Student Employment Hiring Guidelines

Advertising Job Opportunities

Website Postings

Student Employment posts all available on-campus employment opportunities that they are notified of on the Student Employment website. Supervisors should visit the Advertising Job Opportunities page of the website and complete the Job Posting Request form whenever a job becomes available so the job can be posted (http://studentjobs.richmond.edu/supervisors/advertising-jobs.html). The website lists details of available jobs – including department name, job title, contact information, pay rate, and the job description which lists the job duties and qualifications. Interested students are directed to contact supervisors via a direct email link from the job listing and/or by telephone. The job postings on the website can be found at https://studentjobs.richmond.edu/job-openings/index.html.

In order to keep the information on the website as accurate as possible, supervisors must notify Student Employment to remove the job listing as soon as they have received enough applications or the job is filled.

Student Job Fair

In addition to posting available jobs on the website throughout the year, Student Employment also sponsors an annual job fair at the beginning of each fall semester. All supervisors receive an invitation in the summer to participate in the Fall Job Fair. The Job Fair is typically held on the second day of classes. The Job Fair is an excellent opportunity to meet students personally and discuss their qualifications and interests in order to fill your open positions.

Student Employment Application and Departmental Supplements

In an effort to streamline application procedures for students, a universal Student Employment Application is available on the studentjobs.richmond.edu website. The application asks all of the general questions that supervisors should need, and allows students to complete the application and save it to apply to multiple departments. Students can complete, email and/or print a copy of the Student Employment Application, directly from the Student Employment website at https://studentjobs.richmond.edu/job-openings/forms/application.pdf. Individual departments may opt to create a one-page supplement to the application to gather additional job-specific information from applicants.

Electronic Personnel Action Forms (EPAF)

When a student is hired, the first step is for the supervisor to submit an Electronic Personnel Action Form (EPAF) in Bannerweb, which is routed to Student Employment for review and approval (and others, if necessary). Step by step EPAF instructions are located on the Supervisor tab of the Student Employment website here. The EPAF process will tell you if a student has had a previous job on campus. If they have a current position on campus, you can assume that the student has already done pre-employment paperwork and is okay to begin work. If they haven't, you must wait for the student to give you the Release to Work form or for the status of the EPAF to change to "Approved" (see table below).

Upon receipt, Student Employment will check to see if the student is properly enrolled and has an established payroll record (completed pre-employment paperwork). If so, the EPAF will be processed,

as described below. If not, Student Employment will notify the supervisor (via email) that the student is not eligible to work on campus at all or notify them that the student must complete the tax withholding and I-9 forms before they can legally begin work. Please refer to the section entitled "Employment Paperwork" on page 16 for a complete description of the pre-employment paperwork process students must follow.

Student Employment reviews the EPAF, including FWS status for student and the position. If a student changes to a new job title after the initial hire, the supervisor must submit a new EPAF to hire that student in the new position. Also submit a termination EPAF to eliminate the previous job (if that student will no longer work in that position).

The status of the EPAF in BannerWeb will change as it enters various steps as follows:

Waiting	You have saved the EPAF, but have not submitted it.
Pending	You have submitted the EPAF and either 1) SE hasn't looked at it yet or 2) it has been returned for correction, or 3) the student needs to do Pre-employment paperwork before they can legally start working.
Approved	Student is approved to work, but WTE is not yet available.
Completed	Web Time Entry for the student should now be available and the student can now enter his/her hours into Bannerweb for the current pay period. Submit a late paper timesheet to Payroll if the deadline for the pay period has passed.

Summer Research/Fellowship Program

Some faculty and staff have research grants that employ student employees and are processed under the Summer Research/Fellowship Program. The position number for these jobs is STFELW. These grants/fellowships are **generally** requested as follows:

- Federal/state and private grants (paid from index 27xxx, 28xxx, or 29xxx)—Submit an EPAF for these jobs entering (in the comment area of the EPAF) the start & end date, hours per week, rate of pay, hours per week, total pay and who (with knowledge of hours worked) will be approving the student's time. PI approval and Grants Accounting approval is required in the Routing area of the EPAF. Termination EPAFs are automatically incorporated into this EPAF.
- For non-27xxx, 28xxx, & 29xxx external grants—The school/department (e.g. A&S, CCE, Jepson School, Chaplaincy, etc.) will submit an EPAF for these jobs. Termination dates are automatically incorporated into this EPAF.
- Unaffiliated (non-UR related) —the student is not working for a UR faculty/staff member, and the experience occurs off-campus and in no way will benefit the university other than the educational benefit to the student. These payments are processed through Accounts Payable.
- Mentored Research – If a student is doing their own research and is being assisted by a faculty member but the work belongs to the student, no employee-employer relationship exists and the student is paid through Accounts Payable. If the research is owned by the faculty and the student is assisting, then they are considered an employee and must complete employment paperwork, be hired through student employment, and be paid through payroll.

Alternative Payments Methods

There are several types of payment methods that can be used to pay student employees. Most students will be processed under the EPAF process and paid on an hourly basis by entering/submitting time to Payroll via BannerWeb. Some students need to be paid a set amount for the work they perform for working a one-time event. The primary factor in choosing between using an alternative method payment vs. the normal EPAF/hourly time submittal process to establish a student's payroll record is whether or not the job is a one-time, short term assignment or an on-going hourly job.

The procedures for processing payroll for one-time events is different from those of regular hourly students and **do not** require a EPAF or Web Time Entry submittal. However, *any payment to students for services rendered to the University must be paid through the student payroll, as these are taxable earnings. Therefore, all student employees must complete tax and I-9 forms (if they have **not** previously done so) **before they can work** and before a payroll record can be established, regardless of the method used to pay the student*. Contact Student Employment if you are unsure whether the student is an active employee.

International Non-immigrant Visa Holders (NIVH) students who are being paid for work via one time payments are still bound to the hour per week work restriction (see International section, page 16), considering all jobs on campus combined, regardless of how they are being paid. You must ensure the student is approved to work **prior** to working him/her and that the student understands the hours work per week cannot exceed their total limit. Dates and hours worked must be included on the check request. For salary pays, it is necessary to communicate with Student Employment the approximate average hours per week that the student will work for the amount they are receiving and inform the student of this number ahead of time so they will include it in their weekly maximum hours total.

"Salaried" Student Payments
Students who will be paid a set amount on a regular basis, regardless of the number of hours worked, are often referred to as "salaried" student employees. The term "salaried" is used loosely, as they do not receive benefits and are still considered part-time employees. Currently the only job allowed of this type are student residence hall staff (RAs). The supervisors for these positions determine how much the students should receive for the entire academic year or period, and then Student Employment divides that amount by the number of pays and the student is paid on each applicable student payday.

One-time Payments-Check Requests
Students, who are working for a short, finite period of time, and not to be an on-going reoccurring job, will be paid for a one-time event. This allows the student to be paid without being added to the department's roster of regular student employees. This method provides more accurate payroll records for both the department and Student Employment. Students can be paid using the student employment check request form located in the forms section of the Supervisors page on the website: http://studentjobs.richmond.edu/supervisors/forms.html. The check request must be sent directly to the Financial Aid Office (**not** Accounts Payable or Payroll). Supervisors need to consider that the wage rate needs to meet the minimum wage amount, pay time and ½ for any hours over 40 hours in one week.

Please note that check requests for prizes, reimbursements of purchases, dues and other non-compensatory payments should be sent to Accounts Payable using their online check request form in BannerWeb. These payments are *not* for work performed and are not considered taxable income.

Employment Paperwork

The first time a student is hired through the University of Richmond's Student Employment Program, s/he must complete several forms that will be used to establish a payroll record. These forms (described below) need only be completed one time while the student is enrolled at the University, but **must complete these forms before s/he may begin working on campus.** Students must come to the Financial Aid Office to complete these forms M-F 8:30-5:00p.m. Due to international treaties and IRS documentation requirements, international students are required to complete their paperwork in the International Taxation Office. It is crucial that supervisors ensure that their student employees complete their I-9 and tax forms before they start working, as the federal penalty for failure to comply with this stipulation can be as high as $1000 per day that a student works illegally, per violation. Departments who intentionally, continually violate these requirements will be penalized via disciplinary means and/or via discontinuation or reduction of student employment budgets.

State and Federal Tax Withholding Forms
Student earnings are deemed taxable income, therefore students must complete both state and federal tax withholding forms, before a payroll record can be established.

Students who are not Virginia residents must still complete Virginia state tax withholding forms, but may opt for exemption from Virginia state tax withholding if they meet any one of the conditions listed in the instructions on the back of the form.

Employment Eligibility Verification (I-9) Form—Presenting Original Documents
Students must also complete the Department of Homeland Security's Employment Eligibility Verification form, commonly referred to as the I-9. This form requires that the student provide proof of identity and proof of employment eligibility by presenting **original** documents. The I-9 stipulates that only *original* documents may be used to meet this legal requirement. No copies will be accepted.

The list of acceptable documents is located on the website. The employee can present one document from List A **OR** a combination of one document from list B and one from list C. The documents most commonly used are:

1)   an **original** Social Security card and photo I.D. (driver's license, school I.D., etc.) **or**
2)   an **original** birth certificate and photo I.D. (driver's license, school I.D., etc.) **or**
3)   an **original** US Passport.

Students who do not have a Social Security card may apply for a free replacement or duplicate card at the local Social Security Administration office or in some cases online through the SSA website: https://www.ssa.gov/ssnumber/#issnrc. (Please be sure to *only* use the official Social Security Administration website linked above) .

The Student Employment website also has directions to the   closest office. The Social Security Administration will issue the student a receipt when they apply for   the replacement card. **This receipt can be used** (for a maximum of 90 days) **in lieu of the original card to meet the I-9 until the original card is received**. The student can present this receipt to Financial Aid (or International Taxation, if international) to meet the I-9 (or to prove their how their name will be   printed on the card). S/he will be given a Release to Work Form (described below), which signifies s/he   is approved to work on campus. When the new card arrives, s/he must present the original card to Financial Aid (if the receipt was used to meet the I-9) or be terminated.

Release to Work Form
In order to give the supervisor immediate feedback of when **a new student employee** has completed the required paperwork, the Financial Aid Office (or the International Taxation Office, if the student is an NIVH) issues a Release to Work Form (Exhibit 3) as soon as the student is approved to work on campus. This form is given to the student, who is instructed to give it to their supervisor. The supervisor can then immediately begin working the student, even though the job may not be completely set up in Banner. The BannerWeb EPAF process also gives you immediate feedback as to whether the student has ever worked on campus.

A student employee only needs to complete pre-employment paperwork once while a student at the university. If the student has worked on campus before, they have previously completed their pre-employment paperwork, and therefore do not require another Release to Work form and can start working immediately.

<u>International Student Employees (Non-Immigrant Visa Holders (NIVH))</u>

Employing NIVH students on campus involves a myriad of laws and regulations. In today's environment, the government is becoming more diligent in screening and tracking NIVH students who are here to receive an education. Therefore, the university is also required to be more diligent in tracking these students. And, due to tax treaties and conditions of the student visa for which the student was allowed to enter the United States, it is necessary to process NIVH students slightly different than US citizens.

For NIVH students who will work on campus for the first time, instead of completing their tax and I-9 paperwork in Student Employment, the NIVH student will complete paperwork in the Office of International Taxation (OIT). Specific instructions can be found at: http://controller.richmond.edu/payroll/international/employment/student.html. OIT works with Student Employment to complete Banner data entry. As with all **new** student employees who have not worked on campus before, they may not begin working for you unless you have received a "Release to Work" form (see previous "Employment Paperwork" section.)

International students do not qualify for Federal Work-study (FWS).

<u>20/40 Hour Work Limitation</u>

US Immigration and Customs Enforcement (ICE) restricts Non-Immigrant Visa Holders (NIVH) students, on F-1 or J-1 visas, from working more than 20 hours per week during the academic year. They may work full-time during academic breaks (see the Student Employment Website, International Link, for partial week limits). Eligibility to work is contingent upon the student remaining in status. "In status" is a commonly used term that means the student is pursuing a full course of study, maintaining a valid I-20 or DS-2019, not working illegally (i.e. not exceeding the 20/40 hour per week rule or working off-campus without authorization) or breaking any of the ICE rules and regulations by which the student must abide. If these students violate these terms, they violate their visa status and risk deportation.

Because of the risk to the student and to the University, and the fact that the law does not allow NIVH students to work over the limits at all, we determined that we must be proactive in ensuring these students are adhering to the requirements. Therefore, any NIVH student who works more than their prescribed maximum hours will be terminated from the Student Employment program. **This is tracked**

by the Office of International Taxation (OIT) and will apply to the first violation. NIVH students sign a statement (Exhibit 8) that they are aware of these work hour limitations and consequences.

An important item to note, as a supervisor, is that the hour-per-week limit is for all jobs worked on campus combined. So, if you have an NIVH student who is also working in another department, the combined total hours for all jobs cannot exceed 20 hours per week during the academic year and 40 hours per week during official breaks.

Also, students working in a salary position will have a set number of hours assigned to that job. Please discuss the hours assigned to your salary job with your student so that the student is aware of these limits. If a violation occurs, all supervisors will be notified of the student's termination by OIT.

Because we are tracking weekly hours for internationals, it is very important that hours worked be submitted in the pay period for which they occur.

Guidelines for Managing Student Employment

Student Employment Budgets

As with other proposals to your budget(s), if you have a need for *additional* funding you must submit this request using the Division Request for New Funds Form directly to the appropriate Vice President, Dean or Director. Follow the instructions provided by the Planning and Budget Office found on their website at http://businessoffice.richmond.edu/offices/planning-budget/requests.html. These requests for additional permanent student employment funding should not be submitted to Student Employment.

Supervisors must monitor their student employment budgets in the same manner in which they monitor other departmental budgets. Student work hours must be set knowing the student wage rate and within the confines of the student employment budget allocation. It is highly recommended that supervisors bi-weekly review their student employment budgets and expenditures to ensure that they are not over-utilizing funds and that no fraudulent use of funds is occurring (see Fraud Prevention section below). If actual budget expenditures begin to exceed projections, the department may need to reduce student work hours in order to remain within the allocated budget.

Student employment budgets are managed by the Office of Planning and Budget. Any requests for temporary increases for the current FY should be directed to your division budget manager or the Office of Planning and Budget, not to Student Employment. There is no guarantee that additional funds can be made available during a given fiscal year if the department uses their entire budget before fiscal year ends.

All student earnings must be charged to a valid student employment account number. All student earnings will be charged to either account -6311 for UWP) or -6312 for FWS (Federally funded grants will use account -6413). If a department does not have sufficient funds in account 6311 an overage will occur. 6311 account codes are allowed to have overages, but the department is responsible for covering any overage within their overall department budget. Supervisors should also review rosters periodically to ensure the account numbers are still accurate.

Account Number Definitions:

-6311	Student is paid with University Work Program (UWP) funds
-6312	Student is paid with Federal Work Study (FWS) funds (the student must be eligible to earn FWS funds per the Financial Aid Office for that academic year)
-6413	Used by the Grants Accounting Manager for Federally Funded Grants

Please note:

-6313	You may notice this account number on budget reports from the Accounting Office, but understand that this account is just used for calculating the 75% federal portion and does not affect student supervisors. Please ignore.

Student Employment Position Changes

<u>Requesting a New Student Position</u>

Occasionally, supervisors may find they need to add a new position or revise an existing student position. If so, supervisors must create a new job description and assign it an appropriate Pay Grade based on the generic job descriptions listed above and on the Student Employment website:

https://studentjobs.richmond.edu/supervisors/rates.html. Supervisors may post the position online using the process listed above (See Website Postings) and when a student is offered the new position may submit an EPAF as normal. New positions do not need to be approved by student employment but a job description must be created and kept on file by the department.

Job Title Changes/Job Title Additions/Promotions

Because the job titles are used to determine the wage rate and also used later for employment verifications, it is very important to communicate any changes to a student employee's job title by submitting the appropriate EPAF. Examples of possible changes include students changing from one job to another within the department, students being given an additional job within the department and so on. If you are submitting an EPAF for a new job within a department, be sure to also submit a Termination EPAF if an old job should be closed. Failure to notify the Student Employment of these changes can result in students' hours being charged against invalid jobs and students being paid an incorrect pay rate.

Student Terminations

If a student is leaving your department for any reason (except study abroad), please submit a Termination EPAF indicating the student's last work day in the comment area of the EPAF with an effective date of the termination being the first day of the next pay period. Please make sure the student submits all time for the position during the applicable pay period and before the termination date of the EPAF. Accurate records of the termination is crucial so that the student's job record can be updated. This date is used in later employment verifications from potential employers (outside of the University).

If the student has been terminated due to negative work performance or attendance problems, the supervisor is encouraged to forward information to Student Employment to be placed in the student's file record in Banner. Then, other supervisors who are interviewing students in the future can consult with Student Employment to determine if any negative information has been placed in the file.

Student Rosters

Student rosters are very important to accurately manage student employment records/wage rates. Prior to the start of each semester (fall and spring) Student Employment will send supervisors a roster of all active student employees in their department (listed alphabetically by departmental index). These rosters allow supervisors to review active student jobs and make any required changes vis EPAF submission. Supervisors should also check the pay rates and index/account number to ensure they are still accurate for each student and email Student Employment or submit the appropriate EPAF with any changes that need to be made.

Position Control Numbers

In addition to listing the student's name, UR ID number and pay rate, these rosters also list the student's position control number. A position control number is assigned to each job a student has and will be carried over from year to year if the student remains in the same position. Each Position Control Number will also have a unique suffix for that particular student to distinguish between the different jobs a student has (STHRLY-01. STHRLY-02, etc.).

Position control numbers, such as those listed below, are used for regular student positions as well as salaried and one-time payments. For more information on this payment methods, see the Alternative Payments section.

STHRLY	Hourly Student Employee position
STLUMP	One-time payments, usually for check requests
STFELW	Summer Fellowship positions
STSLRA	Salaried Resident Assistant positions
STSUMR	Summer only student positions

Student Personnel Files

When supervisors create a personnel file for their student employees, students' personnel files must be kept separate from students' academic files (if both types of files are kept). This personnel file would contain the student's employment application, performance evaluation(s) and any other notes pertaining to the student's employment history. Departmental student personnel files will *not* contain their I-9 form and tax documentation (these forms are kept on file in Student Employment).

Records Retention

The length of time that student employment records must be retained is determined by two factors: federal employment law and Federal Work-study (FWS) regulations. Documents that must be retained include employment applications, performance evaluations (if applicable), payroll time documents, tax forms, and I-9 forms. FWS regulations stipulate that employment records be retained for five years after the student graduates and employment law stipulates the records be kept for three years following termination of employment. For the sake of convenience and ease, the Student Employment policy stipulates that all records should be retained for a five-year period following graduation. Using the longer of the two retention time frames ensures that both the FWS and employment law regulations are met and eliminates the need to purge different records at different times.

Performance Evaluations

A sample student Performance Evaluation Form has been created for supervisors to use with their student employees: https://studentjobs.richmond.edu/supervisors/pdfs/perf-eval.pdf. This evaluation is designed to enhance communication between the   student employee and the supervisor and to provide feedback to the student employee on job performance. Completing a performance evaluation for student employees is not mandatory; however supervisors are strongly encouraged to use this tool to provide feedback to the student that will enhance their work experience. These evaluations do not need to be turned in to Student Employment but should be kept on file with the department. Further information regarding pay increases can be found in the Student Wage Rate Structure and Wage Increase section of this manual.

Employment Verifications

Frequently, Student Employment receives requests from potential employers and other agencies to verify employment information on former or even current student employees. Since many students have more than one job on campus our office handles the specifics of start/end dates, pay info, etc. so supervisors who receive employment verification requests directly should forward those requests to Student Employment for completion. If a potential employer is looking for character/personal references that is one thing our office cannot provide so it would be appropriate for the supervisor to respond to that aspect and forward the remaining info/request to us. Letters of reference requested by the student are acceptable as well.

For anything more than a personal reference we do require a release authorization form signed by the student as well. Once Student Employment has received the student's signed release from the company, we   will verify the information that is available in the student's personnel records. Supervisors should not provide any information outside of a character/personal reference.

Student Payroll Policies

Student Payroll policies are set and enforced by the Payroll Office, a component of the Controller's Office. However, FAO/Student Employment and the Payroll Office work very closely together to ensure that payroll policies and general student employment policies reinforce and supplement one another. Questions about any of the following payroll policies or practices should be addressed directly to the Payroll Office.

Payroll Schedule

The University of Richmond designates two distinct payroll periods: the academic year payroll and the summer payroll. Enrolled students working on campus during the academic year payroll are exempt from Social Security (FICA) tax withholding, while students working during the summer payroll period are not exempt from FICA and will have FICA taken out of their pay.

The payroll schedule is on the Payroll website and Student Employment website under the Payroll tab at https://studentjobs.richmond.edu/students/payroll-information.html. The payroll schedule lists the deadlines for completing pre- employment paperwork/submitting EPAFs, the dates that BannerWeb Web Time Entry (WTE) submittals/approvals must be submitted to the Payroll Office, and the dates on which students will be paid. Student Employment and the Payroll Offices strictly adhere to the deadlines listed on the payroll schedule.

Student Time

A "Completed" status of an EPAF indicates that the student's payroll record has been approved and the student may access BannerWeb to enter time worked. Supervisors will not see their student's positions in BannerWeb until the student has opened and submitted their timesheet.

Student Web Time Entry (WTE)

All hourly paid student staff will use Web Time Entry as the method for reporting hours to Payroll.

Web Time Entry—Student Instructions—Reporting Time Worked via BannerWeb

*****VERY IMPORTANT---
Student employees must submit their Web time sheet before 10 a.m. on the Monday following the end of a pay period. After that deadline the time sheet is no longer available to update on the Web, and payment for those hours will be delayed by at least two weeks. The student will then need to submit the hours on a paper time sheet. Contact Payroll for further instructions.

Detailed instructions for entering time are available at: http://controller.richmond.edu/payroll/web-time-entry/students.html.

Web Time Entry—Supervisor Instructions—Approving Time

Each employee on Web Time Entry has a designated approver. Approvers choose a proxy who can approve Web Time Entry in their absence. The approver and proxy will have approval access in BannerWeb Time Entry. The Payroll Office strongly suggests approvers set a recurring reminder for every other Friday (or Monday at the latest) on their Outlook. This will ensure their employee's hours are submitted to Payroll by the Monday noon deadline.

For assigning a proxy, please contact the Payroll Office to arrange for your proxy set up. Please be prepared with your network/email user ID and user ID for your proxy.

It is recommended that records be kept of time submitted to Payroll and verified against budget reports.

Detailed instructions for approving students are available on the Payroll Website at http://controller.richmond.edu/common/pdf/payroll/web-time-approval.pdf. Approvers have until noon on the Monday deadline to approve web time sheets. Approvers can review the status of the student's time sheet throughout the pay period and make the approval of the time sheet when the student has completed his shifts for the pay period.

FICA Withholding/Exemption

As noted in previous sections, students who are enrolled at least half time and seeking a degree are exempt from Social Security tax (FICA) withholding on their wages *during the academic year*. The FICA regulations state that a student's exemption is no longer valid if his/her enrollment drops below half time or if a student is working over an academic break of greater than five weeks (summer). The one exception is if the student is a last semester senior currently enrolled in enough credits in order to graduate. Students who choose to work during the winter semester break will still be exempt from FICA withholding, as the break does not exceed five weeks. Exemption from FICA withholding is only available to students who work through the University's Student Employment Programs, not for students working for off-campus or contracted employers. Non-Immigrant Visa Holder students who do not meet the substantial presence test (refer to IRS Publication 519) are exempt from FICA withholding year round.

Overtime Payments

Students are not to be scheduled for more than 40 hours per week. But if worked, students must be paid overtime payment for any hours worked beyond forty in a given pay week. Each pay week runs from Sunday through Saturday. While overtime payments are required by law, supervisors are strongly urged to monitor their students' hours each week to avoid allowing an overtime situation to occur. Please note that students working in more than one job will be paid for their total accumulated hours worked in all jobs and may fall into an overtime status without a supervisor's knowledge. For example, a student holding three 12-hour per week jobs on campus may fall into overtime category by working an extra five hours in one of the jobs. While each supervisor may think that the student is working only twelve to seventeen hours in his or her own department, the total number of hours has exceeded forty. Typically, the overtime charges fall on the department in which the overtime hours occurred and are charged at a rate of 1.5 times the regular pay rate. Overtime is not usually a problem during the academic year, but can become an issue during the summer pay periods (when students tend to work more hours per week). Frequent overtime payments can have an unexpected detrimental effect on a department's student

employment budget and should be monitored closely.

Students are encouraged to work 20 hours or less during the school year to ensure academic success. Students must not work more than an average of 29 hours during the year. FICA exemption laws, require that students are not allowed to work full-time during the academic year and FWS regulation state that students cannot work during his or her scheduled class time.

Paycheck Distribution

Paychecks are generated every other week according to the student payroll schedule, which is posted on the Student Employment website. During the academic year, all checks are mailed to the students' campus/local address, unless otherwise specified by the student. Students wishing to have their checks mailed to an address other than their campus/local address (during winter and spring breaks, for example) must provide a self-addressed envelope to the Payroll Office. Each spring the Payroll Office will notify supervisors and students with information regarding summer paycheck distribution.

Lost or misplaced checks should be reported to the Payroll Office immediately so a stop-payment order can be placed and a replacement check generated. Please see the Payroll website for any updates on Pay card (debit card) payment methods.

Direct Deposit Option

We encourage all student employees to participate in direct deposit. Generally, the student's funds can be directly deposited to any U.S. bank of your choice. To participate in direct deposit, the student should complete the Direct Deposit Authorization online in BannerWeb or complete the authorization form in person at the Payroll Office.

They should read the disclosure statement carefully paying special attention to their responsibility to notify the Payroll Office of any changes to their banking information. If possible, we ask that a voided check be with the form if completing the authorization in person. The voided check gives us the bank routing and account information.

The first payroll after the form has been submitted to the Payroll Office will be a "pre-note" which is a test run to the bank and the student will still receive an actual check. With the following payroll, the funds will go directly into their account.

For more information regarding direct deposit, visit the Payroll Website.

General Student Employment Policies

Many of the policies that guide student employment practices are the same as those that guide University staff practices. Supervisors should refer to their Staff Guidelines manual (available on the Human Resource Services website at https://hr.richmond.edu/) for guidance on these policies. Of particular note, supervisors should review policies regarding harassment and discrimination, equal opportunity and affirmative action and counseling and disciplinary procedures. Several policies have been adapted to apply specifically to student employees and are articulated below.

Student employees do not receive benefits, so holiday and sick pay do not apply to student employees as they are not eligible for any of these benefits.

Inclement Weather Policy

In the event the University closes due to inclement weather, student employees will be paid for that day only under the following conditions (*all three conditions must apply*):

- The *entire university is "*closed*"* (meaning all classes are canceled and non-essential personnel are not required to work)
- The student has *regularly-scheduled hours* on this day
- The student is *unable to make up the hours missed* (due to closure) within the same work week.

Students whose hours and/or days vary during the week should not be paid for hours missed due to closure. Whether these students must make up the hours missed should be considered on an individual basis based on the student employee and departmental needs.

Attendance Policy

Each department has the ability to determine the attendance policy that is appropriate for their student employees. The variety of student jobs and departmental/office hours preclude the creation of a universal policy. Supervisors must communicate their attendance policy to their student employees and enforce the policy appropriately. However, supervisors are strongly encouraged to exercise scheduling flexibility during times of increased academic workload for their student employees when possible.

Off-campus Community Service (FWS Only)

The federal regulations for Federal Work-study (FWS) funds require that a certain percentage of an institution's FWS funds must be spent employing students in jobs that provide community service. Currently the required spending is 7% of the total FWS allocation. The regulations also define the types of jobs that qualify as community service for the purpose of meeting this regulation. The University of Richmond has several programs that allow FWS students to work in a community service setting. Each of these departments are required to provide the Financial Aid Office with contact information (company name, address and contact name) for each off-campus agency in which FWS students will be employed before placing any students at those sites. The Financial Aid Office then sends a contract to each agency, stipulating the details of the agreement between the University and the agency. These contracts are required under FWS regulations and must be signed and returned *before any students may begin working and submitting FWS hours in the agency.*

<div align="center">Workers' Compensation</div>

Like University staff, student employees are covered under the University's workers' compensation insurance should a work-related injury occur. Supervisors should become familiar with the University's workers' compensation reporting procedures listed in the Staff Guideline distributed to new University of Richmond staff employees through Human Resources. Any questions regarding work related injuries or workers' compensation for student employees should be addressed to the Safety Services and Risk Management Office.

<div align="center">Security Statement & Banner Access for Students</div>

It is important that students working in departments with sensitive information understand the confidentiality of any information that they may see during the course of performing their job. A sample security statement is included on the supervisor forms section of the Student Employment website for the student to sign and place in his departmental file prior to access to any sensitive information.

Banner access should only be given to student employees when absolutely necessary. If given, the student ID and passwords are issued to the supervisors and not given to the student. When the student needs to use Banner, the supervisor must log them in to prevent off hours access. Also do not allow your student to use your Banner account to work from.

Pertinent Employment Laws/Regulations

The same laws and regulations that govern employment practices for staff at the University of Richmond also determine the student employment policies. Listed below are summaries of several of the   most pertinent employment laws with which supervisors should become familiar. All descriptions are a   summary of the information provided on the Department of Labor's website (http://www.dol.gov/index.htm) and the University's Staff Guidelines and Policies at https://hr.richmond.edu/current-employees/policies-expectations/index.html.

Immigration Reform and Control Act (IRCA)

The 1986 Immigration Reform and Control Act requires that employers verify that the employees that they hire are legally eligible to work in the United States. In order to verify eligibility, employers must examine original forms of identification and employment eligibility and complete the Employment Eligibility Verification Form (I-9). IRCA requires that the employee must produce the required documentation within three business days of his or her start date or must stop working until the documents are produced. Employers who fail to adhere to the requirements of the IRCA can be fined up to $1000 per employee per day found in violation of the requirement.

Fair Labor Standards Act (FLSA)

The Fair Labor Standards Act (FLSA) regulates the payment of minimum wage, overtime pay for hours worked beyond 40 per week, restrictions on the employment of children and periods of record keeping. All student employment policies and procedures at the University of Richmond comply with the stipulations of the FLSA.

Occupational Safety and Health Act (OSHA)

In general, the Occupational Safety and Health Act requires that employers providing a safe and healthful workplace for employees. The University's Safety & Risk Management Office monitors campus facilities and trains employees to ensure compliance with OSHA regulations. Standards that apply to University staff members also apply to student employees.

Equal Employment Opportunity Act (EEOA)

The U.S. Equal Employment Opportunity Commission enforces Federal laws prohibiting employment discrimination. These laws protect against employment discrimination when it involves unfair treatment because of race, color, religion, sex (including pregnancy), national origin, age (40 or older), disability or genetic information, harassment by managers, co-workers, disability or genetic information, denial of a reasonable workplace accommodation that you need because of your religious beliefs or disability, and retaliation because you complained about job discrimination, or assisted with a job discrimination investigation or lawsuit.

Americans with Disabilities Act (ADA)

The 1990 Americans with Disabilities Act prohibits discrimination against a qualified individual with a disability with regard to job application procedures, hiring, promotion, transfers, discharge, layoffs, training, compensation and fringe benefits. Supervisors must give equal consideration to applicants with disabilities if the applicant has the qualifications and skill required to perform the job with or without reasonable accommodations.

Ethics Compliance Polity

The University of Richmond is committed to complying with all applicable laws and regulations as well as maintaining the highest ethical standards of honesty and integrity. The goal of the compliance program is to facilitate this commitment. This Code applies to all parties representing the University, including student employees. In your role as an employee of the University, your conduct should be guided by the University's Code of Organizational Ethics and Integrity which can be found at https://www.richmond.edu/compliance/pdfs/code-of-ethics.pdf. More information on the compliance program can be found at https://www.richmond.edu/compliance/.

All members of the University community are encouraged to discuss compliance-related questions or concerns directly with their supervisor, department chairs, deans, directors, or other members of the University administration. We also have a way to report concerns confidentially or anonymously through the Ethics and Compliance Helpline. More information on the Ethics and Compliance Helpline is available on the compliance website and at https://www.richmond.edu/compliance/.

The University also has a policy prohibiting retaliation against individuals who raise compliance concerns and questions. It is also available on the compliance website. Please review the information referenced above and if you have questions about the University's compliance program, feel free to contact your supervisor.

Sexual Abuse Reporting Policy

On July 1, 2012, Virginia law pertaining to mandatory reporting of suspected child abuse and neglect will be amended to include all Virginia Public and Private Institutions of higher learning. (Va. Code 63.2-1509) Therefore, the following policy has been implemented.

Any employee of the University of Richmond or a volunteer associated with any youth activity being conducted on University property has any reason to believe that a child is abused or is being neglected has a legal obligation to report he information to Child Protective Services. If you fit in this category you are considered a "Mandatory Reporter".

Each year in Virginia, 39,000 children are reported to local Child Protective Services for suspected abuse or neglect. Because of your position you may recognize indicators of maltreatment and request help and services for the child and his/her family.

Child abuse/neglect is defined as any child under the age of 18 whose parent or other person responsible for the child's care:
- Causes or threatens to cause a non-accidental physical injury or mental injury.

- Neglects or refuses to provide adequate food, clothing, shelter, emotional nurturing, or health care.
- Abandons the child.
- Fails to provide adequate supervision in relation to the child's age and developmental level.
- Commits or allows to be committed any illegal sexual act upon a child including incest, rape, fondling, indecent exposure, prostitution, or to be used in any explicit visual material.

As a mandatory reporter while acting in the capacity listed above, you have a duty to immediately report suspicions of child abuse/neglect. There are two options for the University of Richmond:

1) You may contact the University Police Department at 289-8715; they are designated as a liaison for the University and local Child Protective Services. URPD will collect information and contact Child Protective Services.

2) You may directly contact Child Protective Services thru the Virginia Child Abuse Hotline 1-800-552-7096.

As a mandatory reporter acting in good faith, you are immune from civil and criminal liability.

After a report is made a social worker will interview the child (parental consent may not be necessary) and all others involved. The social worker will complete an assessment determine the risk of harm and develop a safety and services plan within the family.

The University began this process at the beginning of summer 2012. An on-line awareness training component was phased in May and June of 2012. On-Line training has been selected to be the least intrusive to your time commitments and busy schedules. The expectation is that all mandatory reporters shall be provided this information and at some point complete the on-line training (> 1 hour, more information to be provided).

URPD is available to meet with groups with any further questions or discussions as to how to have those initial discussions with a child, etc. after the on-line training is completed.

<div align="center">Confidentiality Agreement (FERPA)</div>

University of Richmond employees support a variety of university functions. Employees may, as part of their duties, need to access confidential individual information from various sources including, but not limited to, financial aid, personal health, tax, credit, bank, loan, personnel and academic records, and other information protected by the Family Educational Rights and Privacy Act of 1974 (FERPA), the Health Information Portability and Accountability Act (HIPAA) and the Gramm Leach-Bliley Act (GLB). With respect to these records and information, and all other confidential property, all student employees are required to read and agree to the following:

1. The employee acknowledges the confidentiality of all student, alumni, donor and employee information of University of Richmond and understands this information will not be revealed to, distributed to or discussed with anyone other than the appropriate, designated supervisor and other University officials as designated by the supervisor.

2. The employee will not attempt to alter, change, modify, add, or delete student or employee record information or University documents unless specifically instructed to do so by the employee's supervisor or other University official.

3. The employee will access only the information specified and authorized by the supervisor. Access to information should be through normal office procedures for obtaining specific access to the information in written documents, computer files, student records, or other University information.

4. All procedures, creative work, written documents, records, and computer programs are created and documented according to standards set by the supervisor and the University of Richmond policies and materials are considered property of University of Richmond and not for public disclosure or use.

The employee understands that failure to abide fully by the above agreements is grounds for immediate discipline, up to and including dismissal from the work position and the University, as well as further disciplinary actions.

Fraud Prevention

Everyone at the University of Richmond has a stake in preventing fraud. Money spent fraudulently is money that could otherwise have supported student services, academic programs or even salary increases. Not all frauds are financial, even though most high-profile ones in profit-making industries have been. The nature of the higher education environment means that other frauds—from grade changes to research—can also make the news, to devastating effect.

The University of Richmond has a strong system of processes in place to prevent frauds, thefts and mistakes, and protect valuable assets. These control processes are varied and include management sign-off on invoices; employee and manager signatures on time cards; written faculty approval of late grade changes; competitive bidding on large purchases; periodic fire extinguisher testing; virus upgrades on the network; and checking a University ID before resetting a network password.

Some examples of how each of us prevents fraud:
- Senior management respects the processes in place and does not pressure employees to bend the rules, even if they promise to take responsibility. Senior management creates the "Tone at the Top," and they want to set a tone of ethical behavior for the rest of us to follow.
- Employees know the rules and follow the rules. Employees question when someone wants to circumvent the rules and, if necessary, can report concerns to their manager, the internal auditor, or the police.
- Individuals responsible for approving invoices, expense reports, grade changes, leave and vacation records, timecards and other documents take the time to read and understand what they are approving. Making the assumption that "my staff wouldn't have put this in here for my approval unless they were sure it was OK" not only circumvents the entire process, but actually leaves your valued staff members vulnerable to questions about their involvement if something inappropriate occurs. Don't approve something without sufficient proof that it is correct.

Report Fraud
Please contact Internal Audit at (804) 289-8099 or make an appointment with the Internal Auditor to report fraud.