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# Job Location & Development

*The Job Location and Development (JLD) Program expands off-campus job opportunities for students who are enrolled in eligible institutions of higher education and who want jobs regardless of financial need. This means that jobs may be located and developed under the JLD Program for FWS and non-FWS eligible students. The JLD Program encourages students to participate in community service activities. See Appendix A for frequently asked questions concerning the JLD Program..*

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JLD community service jobs are designed to improve the quality of life for community residents, particularly low-income individuals, or to solve particular problems related to the needs of community residents. Community services are those the school has identified by working with local nonprofit, governmental, and community-based organizations. Appropriate jobs are those in fields such as health care; child care; literacy training; education (including tutorial services); housing and neighborhood improvement; rural development; and community improvement and jobs that provide supportive services to students with disabilities. A school must inform all eligible students of the opportunity to perform community services and must develop and make available information about community service opportunities.

## JLD PROGRAM PARTICIPATION

A school that participates in the FWS Program is also eligible to participate in the JLD Program. A school that has an executed Program Participation Agreement (PPA) for the FWS Program is able to participate in the JLD Program without any prior contact with the U.S. Department of Education and without any revision to its PPA. The school under the PPA agrees to administer the JLD Program according to the appropriate statutory and regulatory provisions.

If the Department terminates or suspends a school's eligibility to participate in the FWS Program, that action also applies to the school's JLD Program.

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FWS/JLD Termination and Suspension Cite  
*34 CFR 675.37*

## STUDENT ELIGIBILITY

Any student employed in a job developed under the JLD Program must be currently enrolled at the school placing him or her in a job. A school may place in JLD jobs both students who do **not** meet FWS student eligibility criteria **and** those who do meet that criteria. However, using JLD funds to find jobs only for FWS students would not satisfy the program purpose of expanding off-campus jobs for students who want jobs regardless of financial need.

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JLD Eligibility Cite  
*34 CFR 675.31*

Maximum Federal Share for JLD Programs Cite  
*34 CFR 675.32*

## USE OF FWS ALLOCATION FOR JLD PROGRAM

Jobs located or developed under the JLD Program may be for either a profit or nonprofit employer. When establishing or expanding a program to locate and develop off-campus jobs, **including community service jobs**, a school may use **up to the lesser** of the following two amounts:

- 10 percent of its FWS allocation and reallocation
- \$50,000

## USE OF JLD PROGRAM FUNDS

Federal JLD funds are used to pay a school's costs of establishing and administering the JLD Program. The JLD funds are not to be used to pay students whose jobs were located or developed through the JLD Program. A job located and developed under the program must be suitable to the scheduling and other needs of the employed student and must, to the maximum extent practicable, complement and reinforce the educational program or vocational goal of the student.

A school is expected to generate total student wages exceeding the total amount of the federal funds spent under JLD. The school cannot locate or develop jobs at the school or other eligible schools. JLD jobs may be full time or part time. Jobs located or developed under the program must not displace employees or impair existing service contracts. The purpose of the JLD Program is to locate and develop off-campus jobs for students during and between periods of attendance, not to develop jobs for placement upon graduation.

## FEDERAL SHARE LIMITATION

The federal funds that a school sets aside from its FWS allocation to be used for JLD activities may be used to pay up to 80 percent of the allowable costs (listed below). The school must provide the remaining 20 percent of allowable costs either in cash or in services. This requirement, unlike the institutional share requirement for FWS earnings, cannot be waived. The school must maintain records that indicate the amount and sources of its matching share. Procedures and records requirements for JLD are the same as those for all campus-based programs.

## ALLOWABLE PROGRAM COSTS

Allowable costs of carrying out the JLD Program include

- staff salaries (and fringe benefits, if they are the same as those paid to other institutional employees in comparable positions and are not paid to a student employed through the FWS Program);
- travel expenses related to JLD activities;

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JLD Costs That are Allowed and Not Allowed Cite  
*34 CFR 675.33*

- printing and mailing costs for brochures about the JLD Program;
- JLD telephone charges, including installation of a separate line for off-campus employers;
- JLD costs for supplies, equipment, and furniture;
- newspaper or other types of advertising that inform potential employers of the services JLD offers; and
- JLD workshops for students and employers.

Costs that are not allowable are costs related to purchasing, constructing, or altering the facilities that house a JLD project. Indirect administrative costs also are not allowable. One example of an indirect administrative cost is a portion of the salary of someone who is not directly involved in the program—the JLD director’s supervisor, for example.

### FWS STUDENTS AS STAFF IN THE JLD PROGRAM

A school may assign an FWS or a non-FWS student to work as a staff member in the JLD Program, as long as the student is not employed under the JLD Program. The prohibition against using JLD funds to locate and develop jobs at any school prevents a school from employing a JLD student (whether he or she is also an FWS student or not) to work as staff in the JLD Program. This prohibition does not, however, mean that the school is also prohibited from employing any student (FWS or non-FWS) to work as staff in the JLD Program. Student jobs as staff in the JLD Program are not located and developed with JLD funds, and the student wages earned working for the JLD Program are not reportable in the JLD section of the *Fiscal Operations Report and Application to Participate* (FISAP).

If a school places an FWS student as staff in the JLD Program, there are some important points to note. The statute and the FWS regulations prohibit the use of any funds allocated under the FWS Program from being used to pay the nonfederal share of FWS compensation to its students. Hence, the federal JLD funds may not be used to pay the nonfederal share of FWS wages earned by a student working as staff in the JLD Program. However, because JLD allowable costs include staff salaries, the school would use its own funds to pay the nonfederal share of the wages earned by an FWS student working as staff in the JLD Program and would count those funds in meeting the minimum 20 percent institutional share requirement.

### JLD REPORTING ON THE FISAP

A school participating in the JLD Program must provide information on the FISAP concerning the uses of the JLD funds and an evaluation of the effectiveness of the JLD Program. The school reports in Part V, Section D of the FISAP the federal expenditures for

JLD. In Part V, Section G, the school reports the total JLD expenditures, institutional expenditures for JLD, number of students for whom jobs were located or developed, and total earnings for the students.

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Agreements with Other Eligible  
Schools Cite  
*34 CFR 675.34*

### MULTI-INSTITUTIONAL JLD PROGRAMS

A school that is participating in FWS may enter a written agreement with other eligible schools for those schools to establish and to operate a JLD Program for its students. The agreement must designate the administrator of the program and must specify the terms, conditions, and performance standards of the program. Each school that is part of the agreement retains responsibility for properly disbursing and accounting for the federal funds it contributes under the agreement.

For example, each school must show that its own students have earned wages that exceed the amount of federal funds the school contributed to locate and develop those jobs. This fiscal information must be reported on each school's *Fiscal Operations Report and Application to Participate* (FISAP).

If a school uses federal funds to contract with another school, suitable performance standards must be part of that contract. Performance standards should reflect each school's philosophy, policies, and goals for the JLD Program. A school may **not** develop performance standards, conditions, or terms that are inconsistent with the statute or regulations. In all cases, the performance standards should be clearly understandable, because they will be included in the formal written agreement that each party must observe as part of its responsibility within the particular arrangement.

## JOB LOCATION AND DEVELOPMENT (JLD) PROGRAM -- FREQUENTLY ASKED QUESTIONS

### ***What is the Job Location and Development (JLD) Program?***

The JLD Program is one of the Federal Work-Study (FWS) programs. An institution is allowed to use part of the federal funds it receives under the FWS Program to establish or expand a JLD Program. **A JLD Program** locates and develops off-campus jobs for currently enrolled students who want jobs, regardless of their financial need. The JLD Program encourages students to participate in community service activities.

### ***What is the specific dollar limit on the FWS federal funds that may be used for the JLD Program?***

An institution may use up to the lesser of \$50,000 or 10 percent of its total FWS allocation to establish or expand a JLD Program.

### ***Does the JLD Program require institutions to provide an institutional share?***

Yes. **CTS recommendation: The institution may use federal funds to pay up to 80 percent of the JLD Program's allowable costs.** The institution must provide the remaining 20 percent of allowable costs either in cash or in services. **CTS recommendation: The remaining 20 percent of allowable costs must be provided by the institution. The school can choose to meet this expense with either cash contribution or in services to the JLD Program.** The institution's 20 percent share may be either (1) 20 percent of each allowable cost, or (2) varying percentages of allowable costs, as long as its total expenditures of institutional funds and/or provision of services equals at least 20 percent of the total allowable costs for the JLD Program. The institution must maintain records that indicate the amount and sources of its share. The fiscal procedures and records requirements for JLD are the same as those for the FWS Program.

### ***Does the JLD Program provide for a waiver of the institutional share requirement?***

No. The JLD institutional share requirement, unlike the institutional share requirement for FWS earnings, cannot be waived.

### ***What are allowable costs of carrying out the JLD Program?***

Allowable costs of carrying out the JLD Program include staff wages and salaries (may also include fringe benefits if they are the same as those paid to other institutional employees in comparable positions and the fringe benefits are not paid to an FWS student; travel expenses; printing and mailing costs; telephone charges, including installation of a separate line for off-campus employers; costs for supplies, equipment, and furniture; newspaper or other types of advertising, and costs for workshops for students and employers.

***What costs are not allowable under the JLD Program?***

Costs that are not allowable are related to purchasing, constructing, or altering the facilities that house a JLD project. Indirect administrative costs also are not allowable. One example of an indirect administrative cost is a portion of the salary of someone who is not directly involved in the program such as the JLD director's supervisor. Other examples of indirect administrative costs are lighting, heating, or custodial costs incurred as a part of the normal operations of the facility in which the JLD Program is administered such as the financial aid or placement offices.

***If an institution is eligible to participate in the FWS Program, is it automatically qualified for JLD?***

Yes. An institution eligible to participate in the FWS Program is also eligible to participate in the JLD Program.

***When an institution that is currently participating in the FWS Program wants to participate in the JLD Program must it make prior contact with the Department or have its Program Participation Agreement (PPA) revised?***

No. An institution that is currently participating in the FWS Program does not have to contact the Department **to** participate in the JLD Program. The fact that the institution has an executed PPA for the FWS Program means that the institution is also able to participate in the JLD Program without any prior contact with the Department or revision to its PPA. The institution under the PPA agrees to administer the JLD Program according to the appropriate statutory and regulatory provisions.

***Is there any information that an institution must provide to the Department if it participates in the JLD Program?***

Yes. An institution that participates in the JLD Program during an award year must provide information about its JLD activities on the *Fiscal Operations Report and Application to Participate* (FISAP). The institution provides total JLD expenditures, federal expenditures for JLD, institutional expenditures for JLD, number of students for whom jobs were located or developed, and total earnings for those students.

***Is an institution required under the JLD Program generate a certain amount of student wages?***

Yes. Under the JLD Program, an institution must locate and develop jobs that generate total student wages exceeding the total amount of the federal funds spent under the JLD Program.

***May an institution participating in FWS enter into a written agreement with other participating institutions to establish and operate a JLD Program?***

Yes. An institution that is participating in FWS may enter into a written agreement with other FWS participating institutions to establish and to operate a JLD Program for its students. The agreement must designate the administrator of the program and must specify the terms, conditions, and performance standards of the program. Each institution that is part of the

agreement retains responsibility for properly disbursing and accounting for the federal funds it contributes under the agreement. For example, each institution must show that its own students have earned wages that exceed the amount of federal funds the institution contributed to locate and develop those jobs.

***What types of organizations should an institution contact to locate and develop jobs through the JLD Program?***

Jobs located or developed under the JLD Program may be for either a profit or nonprofit employer.

***May the JLD Program be used to locate and develop jobs for FWS students?***

Yes. Federal JLD funds are to be used to pay the institution's costs of establishing and administering the JLD Program under which jobs are located and developed for FWS and non-FWS eligible students. However, using JLD funds to find jobs only for FWS students would not satisfy the statutory requirement to expand off-campus jobs for currently enrolled students who want jobs, regardless of their financial need.

***May JLD Program funds be used to locate and develop jobs at the institution or at other eligible institutions?***

No. The institution cannot use JLD funds to locate and develop jobs at the institution or at other eligible institutions. The JLD funds can only be used to locate and develop jobs off-campus.

***May JLD funds be used to pay students whose jobs were located and developed through the program?***

No. The JLD funds are not to be used to pay students whose jobs were located and developed through the JLD Program.

***May an institution employ FWS and non-FWS students as staff in the JLD Program?***

Yes. An institution may employ FWS and non-FWS students as staff in the JLD Program. The prohibition against using JLD funds to locate and develop jobs at any institution does not include the hiring of students to work as staff for the JLD Program itself because the JLD staff jobs were not located and developed with JLD Program funds.

***May the federal JLD funds be used to pay the nonfederal share of the wages earned by FWS students working as staff in the JLD Program?***

No. The use of any funds allocated under the FWS Program is prohibited from being used to pay the nonfederal share of FWS compensation to its students. However, since JLD allowable costs include staff salaries, the institution with its own funds would pay the nonfederal share of the wages earned by FWS students working as staff in the JLD Program and count those funds in meeting the minimum 20 percent institutional share requirement.

***May the institution under the JLD Program locate and develop jobs for students to obtain upon graduation?***

No. The program locates and develops off-campus employment opportunities for students during and between periods of attendance. The program may not be used for the placement of students in jobs upon graduation.

***Does the JLD Program encourage locating and developing jobs for students that provide community services?***

Yes. The statement of purpose for the JLD Program encourages participation in community service activities. Further, the JLD Program description notes that funds are to be expended to establish or expand a program to locate and develop jobs, including community service jobs. However, the JLD Program does not have a specific minimum community service requirement, as does the FWS Program.

***Does the JLD Program have a requirement similar to the one for the FWS Program that jobs, to the maximum extent practicable, complement and reinforce the educational programs or vocational goals of the students in question?***

Yes. Under the JLD Program, the jobs located and developed must be suitable to the scheduling and other needs of the students and, to the maximum extent practicable, must complement and reinforce the educational programs or vocational goals of these students.

***May the jobs located and developed under the JLD Program be full-time?***

Yes. The jobs located and developed under the JLD Program may be either full-time or part-time.

***May jobs located and developed under the JLD Program result in the displacement of employed workers?***

No. The jobs located and developed under the JLD Program must not displace employees or impair existing service contracts.