



## Work-based Learning Grant Opportunity - Internships

### Frequently Asked Questions

#### Student Eligibility

**Q: Are graduate students eligible for program?**

A: Yes.

**Q: If students need to be currently enrolled, can internships extend beyond the end of May and/or span between Spring and Summer semesters, during the space between semesters?**

A: Yes, the internship can occur during any time between January and September 2022.

**Q: Do the students have to meet ALL of the eligibility requirements? What if a student never applied for financial aid? What is our criteria for determining the impact of COVID-19?**

A: If your proposed project includes financial aid to interns, student eligibility for financial aid must conform to the following section of the RFA:

#### 5.2. ALLOWABLE COSTS AND PROHIBITED COSTS

##### 5.2.1. Allowable Cost Categories.

Students do not need to meet financial aid criteria for the purposes of converting unpaid internships to paid internships. To clarify, there are four allowable expenses for this grant:

1. Converting non-paid internship programs to paid work-based learning opportunities for students;
2. Increasing the number of students participating in paid work-based learning opportunities;
3. Increasing wages for students participating in paid work-based learning opportunities;
4. Providing financial support to student interns with demonstrated need.

The student eligibility requirements for financial aid apply only to allowable cost #4. In regard to student eligibility for financial aid the student must meet the criteria provided in section 5.2.1 which includes filing FAFSA or TASFA and have demonstrated financial need. The criteria for determining impact of Covid-19 is at the sole discretion of the institution.

**Q: Are the student eligibility requirements (FAFSA/TAFSA, financial need/Title IV eligible, COVID-19, etc.) applicable to all interns that these funds help pay the wages of, or just to students receiving additional financial support?**

A: No, those student eligibility requirements only apply to financial aid. If an institution chooses to offer financial aid to interns as part of their project proposal, student eligibility requirements for financial aid apply only to interns receiving financial aid under this grant.

To clarify, there are four allowable expenses for this grant:

1. Converting non-paid internship programs to paid work-based learning opportunities for students;
2. Increasing the number of students participating in paid work-based learning opportunities;
3. Increasing wages for students participating in paid work-based learning opportunities;
4. Providing financial support to student interns with demonstrated need.

The student eligibility requirements for financial aid apply only to allowable cost #4.

**Q: Is grant open to full-time and part-time students?**

Yes.

**Q: There is research that supports the theory that students who participate in unpaid internships don't always have a financial need. If we find this holds true, what if we have plenty of areas of study with a high percentage of unpaid internships but they don't meet the financial aid requirements? What flexibility do we have?**

A: Converting unpaid internships to paid internships does not require demonstrated financial need from students.

**Q: Are coops, practicums, clinicals, and/or student teaching eligible for Work-based Learning Opportunity Grants - Internships grants?**

A: For the purposes of this grant program, internships are not synonymous with coops, practicums, clinicals, and/or student teaching. Converting coops, practicums, or student teaching placements from unpaid to paid positions may be considered if funds are available. However, non-internship work-based learning will not be given priority by reviewers. Additionally, clinical placements are not eligible for funding under this grant.

**Q: International students are not eligible for financial aid. Are they eligible for intern wages?**

A: Yes.

**Q: Do student interns not receiving additional financial support need to do a FAFSA/TAFSA, etc., as outlined in the RFA?**

A: No. Those requirements only apply if you are offering financial aid.

**Q: Are off-campus work-study interns/students eligible for this program/funding?**

A: No. Work-study programs are operationalized differently than internships and adhere to a unique set of federal and state guidelines.

**Allowable Expenses**

**Q: Does the prohibition on travel expenses include student travel expenses to/from internship?**

A: Yes.

**Q: If internships are currently unpaid, will the grant pay to offset the full cost of wages to pay participants the full \$20 per hour?**

A: Yes. Additionally, \$20 per hour is the minimum pay. The amount of pay for the internship should be supported by workforce data and thus may exceed \$20 per hour.

**Q: Are internships which receive academic credit through the university excluded from this opportunity?**

A: No.

**Q: Are the internships only for Spring 2022 and Summer 2022 semesters? It might be hard to schedule Spring 2022 internships now given that the semester has already started. If a student graduates at the end of May 2022, could the student continue with a paid internship in Summer 2022?**

A: Yes, this grant program applies only for spring and summer 2022. Please note that pre-award costs may be included in the application; the U.S. Department of Education has authorized pre-award costs in GEER awards.

**Q: Is the \$2,500 cap for intern wages or just for the financial aid part?**

A: The \$2,500 cap applies only to financial aid, not to intern wages.

**Q: If the internships may be processed through payroll processes by the outside entities, they may also need funds to cover FICA match (7.65% of the internship wage). Would this be an allowable cost?**

A: This would be considered a direct cost to administering the grant and is allowable.

**Institution Eligibility**

**Q: Can one institution but two separate programs work together on a single grant application to fund interns? For example, behavior analysis interns and school psychology practicum students? (Faculty within each intern program will work together to allocate funds).**

A: Yes.

**Q: Eligibility Requirements 3.1 states that “an off-campus internship program is one that places students with businesses or employers...” Please clarify the wording of “places students.”**

A: Placing students may be an active or passive activity. An internship program may be one where institution staff actively find placements for students intentionally. Alternatively, an internship program may be one where institution staff passively facilitate internship placements, using tools like Handshake.

**Q: We have degree programs with required internship programs for the degree and those where internships are elective credit courses. Is the latter acceptable for the funding to increase these elective internships for credit opportunities, which are more often unpaid?**

A: Yes.

**Q: Is matching required?**

A: No.

**Q: We do not have an internship program, but help students search for internships and review their résumés and cover letters. Would this allow us to qualify?**

A: Yes.

**Q: We do not have any data to provide except if a student notifies us directly or notifies us via our outcomes survey.**

A: Data from Outcomes Surveys are acceptable. Consider scanning other academic departments for their Outcomes Survey results, as well.

**Q: Would nursing, social work, and education qualify for apprenticeships (vs. internships)?**

A: Academic programs typically do not utilize apprenticeship models, as defined by federal and state policy. This RFA is specifically for internship programs. There is a separate RFA for apprenticeships.

**Q: We currently pay students \$12/hour with work study dollars for internships in external non-profit organizations. Can we supplement those students with dollars from this grant?**

A: Students currently paid with work-study dollars are considered work-study students. This grant cannot be used to increase wages for work-study students.

### **Application Process**

**Q: In 4.1d: Is there a particular workforce database that we should be referring to?**

A: There are several workforce data sources that are acceptable: Burning Glass, Emsi, U.S. Bureau of Labor Statistics, etc. Also, the THECB created a [Texas Workforce Development Toolkit](#) in collaboration with Brookings Institution.

**Q: Are letters of support from external internship providers allowed?**

A: Yes. We recommend you include any such letters as an appendix in your application.

**Q: Can you help clarify "workforce data"? Are you talking about BLS wage data for our particular area/region?**

A: We recommend you use data that speaks to the success of your relevant program(s). If your program places most graduates regionally, then use regional data. If your program places most graduates in Texas, then use state data. There are several workforce data sources that are acceptable: Burning Glass, Emsi, U.S. Bureau of Labor Statistics, etc. Also, the THECB created a Texas Workforce Development Toolkit in collaboration with Brookings Institution: [https://brookingswof.shinyapps.io/TX\\_workforce\\_dev\\_app/](https://brookingswof.shinyapps.io/TX_workforce_dev_app/).

**Q. The grant requires a maximum of 125 contact hours (\$20/ hour with a \$2,500 cap per student). What happens when the program's THECB internship contact hour requirement exceeds 125 hours? Are the remaining hours unpaid? Or must we request that the employers continue to pay \$20/ hour for the duration of the internship. Examples include Music Business (240 required contact hours), Computer Studies (224), Marketing (288), Biotech (336), etc.**

A: The grant **does not** require a maximum of 125 contact hours. The \$2,500 cap applies only to the financial aid component under this grant. It does not apply to converting unpaid internships to paid internships.

**Q: Is there a chance that the grant will be extended through the fall semester? Currently, we are looking at part of the spring semester, all of the summer (historically our lowest internship semester each year), and one month of the fall semester.**

A: No, not at this time. This grant is funded with GEER funds and those funds must be expended by September 30, 2022.

**Grant Implementation**

**Q: How are payments handled? To the employer as a vendor? Directly to the students through HR? What are the documentation requirements?**

A: The method for disbursing payment to students is at the discretion of each institution. If any funds are paid to the employers as a vendor, your institution will need to determine whether the relationship with the vendor is that of a contractor or subrecipient and then apply the Uniform Grant Guidance requirements based on that determination.

**Q: Our industry partners hire interns from multiple institutions and pay \$18. Will the industry partner be required to raise hourly pay for all interns to \$20 or just those interns that were being funded by the grant?**

A: The grant may be used to raise this hourly wage to \$18 an hour for students from your institution. You may also want to consider other internships that are unpaid and convert them to paid, or that are not close to market value.

**Q: Following up on the \$18 wage paid by the employer. Doesn't the RFA require the institution to make up the difference between \$18 and \$20?**

A: No. There are four allowable expenses for this grant:

1. Converting non-paid internship programs to paid work-based learning opportunities for students;
2. Increasing the number of students participating in paid work-based learning opportunities;
3. Increasing wages for students participating in paid work-based learning opportunities;
4. Providing financial support to student interns with demonstrated need.

Increasing wages for paid internships is an option for this grant program; it is not a requirement.

**Q: Is there a maximum amount of \$ a student can earn during their internship?**

A: No. However, pay should be commensurate with relevant workforce data.

**Q: What are tax (payroll) implications for students? For employers?**

A: Federal tax policy applies to paid internships the same way it applies to other paid work. The tax implications of an internship are somewhat different depending on the type of organization the student works for: for-profit firms, government/municipal entities, or private non-profit organizations. We recommend you ask your Career Services professionals for guidance, as they are likely familiar with relevant tax laws.

**Q: What's the timing for initial disbursement of funds?**

A: Funding disbursement is outlined in Section 8.3 of the RFA, Funds Disbursement and Payment Terms, "After full NOGA execution and THECB receipt of the Disclosure of Interested Parties, as applicable, one half of awarded funds are payable to enable the Grantee to fully perform the Services described in its Application." Awards are expected to be announced on February 15, 2022.

**Q: If we know before September 30th, 2022 our students for fall semester who will be enrolled in unpaid internships. Can we pay the employers a larger check as a stipend that will be divided up based on the student's hours worked throughout fall of 2022? That way we can still count that funding as "spent" but it will help students enrolled in the fall 2022 semester.**

A: No. The September 30, 2022 end date requires the funds to be expended which means that the services are rendered.. The services from the employer - having mentored a student - will not have been substantively delivered by the grant end date.

**Q: Will the interns' contribution under the grant, including the copyright, systems, etc., belong to the THECB, the University, or the industrial partners?**

A: The interns' contribution will not belong to THECB. Please defer to your local policy and the employer agreement in regard to ownership by other parties.

**Q: We (Lamar University) use opportunities at a TAMU-AgriLife field research facility remote from any TAMU campus but close to use for mutual benefit, they have interns, and we have placements. They pay \$10/hr. Can TAMU AgriLife still be an internship provider these grant funds?**

A: As long as the student interns are participating in an off-campus internship program, the funds can be used to raise these wages to \$20 (the minimum market value wage as defined in the TXWORKS Framework).

**Q: Could you please confirm whether the THECB is treating this as a federal grant pass-through or as a contract? There is conflicting information in the RFA (e.g., reference to compliance with the Uniform Grant Guidance, suggesting it's a federal pass-through; seven-year records retention period, suggesting it's a contract (federal grants are normally three years)).**

A: The Internship RFA is a grant opportunity and not a contract for goods or services. The RFA utilizes funding from the U.S. Department of Education's Governors Emergency Education Relief (GEER) program that the Governor allocated to the THECB. THECB is thus a subrecipient of the GEER funds. It is our understanding that under our subaward a seven-year retention schedule is required both for THECB and any sub-sub-recipient. In the event the retention period is shortened we will consider amending the grant requirements.