

Woods Hole Oceanographic Institution
GUEST STUDENT POLICY

Guest Student appointments may be granted to matriculated graduate and undergraduate students from other institutions who desire to conduct collaborative research at WHOI for a period of at least two weeks. Upperclass high school students enrolled in Upper Cape and Islands schools can be appointed as Guest Students when doing a project associated with their schoolwork (otherwise, they should be appointed as Part-Time Helpers). These appointments are a courtesy to assist in collaboration and to afford the student access to WHOI facilities and services.

Guest Students are not salaried, but, at the sponsor's discretion, they may receive remuneration including stipend, housing allowance, and/or travel allowance. Housing and travel allowance are for students whose permanent address is more than 50 miles from Woods Hole and may only be paid when it will assist them to reside in the Woods Hole area during their appointment. Students living more than 50 miles from Woods Hole who will be commuting may receive travel reimbursement at the sponsor's discretion. Since High School Guest Students are all local, they cannot be paid for living or travel expenses.

Guest Students are not substitutes for employees (see *US Department of Labor* guidelines below). The appointment must offer students an environment for mentoring and provide an educational benefit. Students who are performing a service at WHOI should be appointed as employees through the Human Resources Office.

Process

Guest Student appointments are initiated by the hosting member of the Scientific or Technical Staff (sponsor) in an education memo explaining how the appointment benefits the student in his/her academic pursuits. The memo is submitted with a completed Authorization to Appoint a Guest Student form. If the student is a foreign national, an English Proficiency form is also required of the sponsor. If the student is a minor, the sponsor also needs to complete the Minor Acknowledgment form. Applicants must submit a completed application and an official transcript or enrollment verification letter from their university. If desired, the sponsor may require letters of recommendation, a research statement and/or a CV.

The Department Chair or Department Administrator must approve the appointment prior to routing. If the student is a foreign national, the completed packet should be sent to the Foreign National Advisor in Human Resources (fna@whoi.edu). If the student is a US citizen or permanent resident, the materials may be forwarded directly to the Guest Student Coordinator (guest-student-coordinator@whoi.edu) for processing.

The detailed Procedure to Appoint a Guest Student, the Authorization form, and a Financial Assistance Award Notice (FAAN) template can be found on the Guest Student website (<http://www.whoi.edu/main/gueststudent/admissions>).

**US Department of Labor
Employment & Training Administration
Advisory system**

The US Department of Labor's Wage and Hour Division has developed the six factors below to evaluate whether a worker is a "trainee" or an "employee" for purposes of the Fair Labor Standards Act (FLSA):

Whether trainees or students are employees of an employer under the FLSA will depend upon all of the circumstances surrounding their activities on the premises of the employer. If all of the following criteria apply, the trainees or students are not employees within the meaning of the Act:

- 1. The training, even though it includes actual operation of the facilities of the employer, is similar to what would be given in a vocational school;*
- 2. The training is for the benefit of the trainees or students;*
- 3. The trainees or students do not displace regular employees, but work under close supervision;*
- 4. The employer that provides the training receives no immediate advantage from the activities of the trainees or students, and, on occasion, the employer's operations may even be impeded;*
- 5. The trainees or students are not necessarily entitled to a job at the conclusion of the training period, and;*
- 6. The employer and the trainees or students understand that the trainees or students are not entitled to wages for the time spent in training.*