



U.S General Services Administration (GSA)

GSA Order: GSA Student Volunteer Service Program (SERVICE)

HRM 9308.1A

Office of Human Resources Management

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Purpose:

This Order issues and transmits General Services Administration (GSA) policy governing the use of Student Volunteers.

Background:

The Civil Service Reform Act of 1978 ([P.L. 95-454](#)) authorized the Federal Government Volunteer Student Service. The Student Volunteer Service Program gives qualified students a means to volunteer their services to GSA, allowing volunteers to gain work experience, knowledge, and engage in early career exploration. Selected students are allowed to work on a non-pay voluntary basis during a specific time and under the direction of a designated GSA employee.

Applicability:

1. This order applies to all GSA offices and departments that engage in the Student Volunteer Service Program. The policy outlines the framework for the management and oversight of student volunteers, ensuring compliance with the Civil Service Reform Act of 1978 ([P.L. 95-454](#)), [5 USC Section 3111](#), and [5 CFR 308](#). It is applicable to all qualified students who volunteer their services to GSA on a non-compensated basis and GSA employees designated as supervisors who are responsible for overseeing the activities and integration of student volunteers within their respective areas.
2. The Office of Inspector General (OIG) has independent personnel authority. See Section 6 of the Inspector General Act of 1978, (5 U.S.C. App.3), as amended (Inspector General is authorized “to select, appoint, and employ such officers and employees as may be necessary for carrying out the functions, powers, and duties of the Office of Inspector General”) and GSA Order ADM 5450.39D CHGE 1 GSA Delegations of Authority Manual (Delegations Manual), Chapter 2, Part 1 (“the Inspector General has independent authority to formulate policies and

make determinations concerning human capital issues within the [OIG]" and GSA determinations/delegations do not limit that authority). Similarly, GSA specifically recognizes that the Inspector General has independent authority to formulate policies and make determinations concerning training, employee development, and career management.

3. This Order applies to the Civilian Board of Contract Appeals (CBCA) only to the extent that the CBCA determines it is consistent with the CBCA's independent authority under the Contract Disputes Act and it does not conflict with other CBCA policies or the CBCA's mission.

Cancellation:

This Order cancels and supersedes HRM 9308.1, GSA Student Volunteer Services Program (SERVICE), dated November 16, 2017.

Summary of Changes:

1. Duty titles were updated to align with the Office of Human Resources Management (OHRM) 2024 reorganization.
2. Minor language, formatting, and informational structure changes to improve logical flow and readability.
3. Updated all references with valid links for all citations.
4. Shifted the program oversight from HR Service Center Directors to the Staffing Services Center Section Chiefs in their assigned areas.
5. Program responsibilities and roles of various stakeholders (e.g., HR Specialist, Staffing Branch Chief, Services and Staff Offices) are more explicitly defined.
6. Volunteer agreement requirements expanded to specify minimum components, participating parties and emphasize the termination requirement when transferring educational institutions.

Signature

/S/ _____

Arron E. Helm
Chief Human Capital Officer
Office of Human Resources Management

2/5/2025

Date

Table of Contents

1. Introduction	4
2. References	4
3. Definitions	4
4. Responsibilities	6
5. General Provisions	7
6. Eligibility	7
7. Uncompensated Service	8
8. Status	8
9. Relationship to Other Student Programs	8
10. Program Requirements	8
11. Suitability Requirements	10
12. Documentation and Recordkeeping	11
13. Appendix A Template Agreement Student Volunteer Service Agreement	12
14. Appendix B Work Schedule Template	14
15. Appendix C Attendance Record Template	15
16. Appendix D Student Volunteer Evaluation Report	16

Introduction:

This Order outlines the procedures and assigns responsibilities for implementing the Student Volunteer Service Program within GSA. The program provides an opportunity for students to gain valuable work experience and engage in career exploration while contributing to the agency on an uncompensated basis.

References:

1. [5 USC Section 3111](#)
2. [5 CFR 308](#)
3. [28 USC 2671 through 2680](#)
4. [5 USC, Chapter 81](#)
5. [Guide to Processing Personnel Actions \(GPPA\), Chapter 33, Documentation of Volunteer Service](#)

Definitions:

1. Agreement is the written documentation of the duties, responsibilities, and obligations of the student, the educational institution, and GSA.
 - a. Agreements shall at a minimum include:
 - i. A description of the projects and work assignments to be accomplished by the student.
 - ii. The duration of the volunteer service period.
 - iii. The weekly work schedule.
 - iv. Attendance records.
 - v. Performance evaluation.
 - vi. An acknowledgement that the student's services may be terminated by the agency at any time (see appendix A).
 - b. Agreements are negotiated with the educational institution and the management official responsible for supervising the student in the workplace.
 - c. Student Volunteer Service Agreements shall be signed by the designated representative of the educational institution, the GSA services or staff office designated management official, the student, and the servicing HR Specialist.
 - d. Copies of the agreement shall be furnished to the student, the educational institution, the student's supervisor, and the Staffing Services Center.
 - e. The SERVICE agreement is negotiated with a particular educational institution. If a student transfers to a different educational institution,

whether following an academic break (e.g., summer or winter) or at the end of a term or semester, the SERVICE agreement will be terminated upon completion of the current assignment or term/semester, whichever occurs first. Any further participation in the SERVICE program will require a new agreement and be in accordance with the conditions outlined in Eligibility Section 6.

2. The Hosting Office is the organizational unit within the Service or Staff Office responsible for overseeing a student volunteer's assignment. This includes designating a supervisor, negotiating the volunteer agreement with the educational institution, ensuring the volunteer's duties align with program objectives, and fulfilling all obligations outlined in the agreement, such as maintaining records, evaluating performance, and supporting the volunteer throughout their assignment.
3. Student is defined as an individual enrolled in an accredited high school, trade school, technical or vocational institution, junior college, college, university, or other accredited educational institution in a course of study not less than half-time. To be considered a student, the individual:
 - a. Must submit an acceptance letter or proof of new or continuing enrollment status as part of the documentation of the student's intent to pursue his or her education or training.
 - b. Must submit a written certification from the student's educational institution to verify that the student is enrolled at least half-time under its academic program.
 - c. Must not have a break (e.g., summer, winter) of more than 5 months between school years.
 - d. Must demonstrate a firm intent of continuing to pursue a course of study or training in the same or a different educational institution during the school term immediately after the volunteer assignment.
4. Transcript is an official academic record issued by an educational institution, detailing courses, grades, and degrees. It may be provided in physical form or through an institution's secure electronic system, authenticated with a seal or signature.
5. Unofficial transcript is an academic record with similar details as an official transcript but lacking formal authentication, often accessed through a student portal.
6. Volunteer service consists of the projects and work assignments performed by students, with the permission of the educational institution at which they are enrolled, as part of the agency program designed to provide educational experience to the student. The services provided by the students accepted for

SERVICE are uncompensated and may not be used to displace any employee or to staff a position which is a normal part of the GSA workforce.

Responsibilities:

1. The Staffing Policy and Programs Office in the HR Services Staffing Services Center is responsible for:
 - a. Informing the Staffing Services Centers of program requirements.
 - b. Developing and maintaining the policy for the Volunteer SERVICE program in GSA.
 - c. Serving as GSA's liaison with the Office of Personnel Management (OPM), other Federal agencies, and special interest groups.
2. The Staffing Section Chief is responsible for:
 - a. Overseeing the overall implementation and management of the Student Volunteer Service Program in their assigned area.
 - b. Ensuring that all program requirements outlined in this policy are strictly followed and adhered to by relevant staff.
 - c. Providing guidance and support to HR specialists and other staff involved in program activities.
 - d. Addressing any challenges or issues that arise during the program to ensure smooth operations.
3. The Servicing HR Specialist is responsible for:
 - a. Assisting customer offices in promoting their student volunteer opportunities, when necessary.
 - b. Overseeing the selection process for volunteer assignments to ensure fairness and transparency and verifying that opportunities are shared equitably among potential candidates and align with program objectives.
 - c. Reviewing and approving agreements between service or staff offices and educational institutions, ensuring compliance with agency and legal standards.
 - d. Assisting with the process of bringing on student volunteers.
 - e. Ensuring the agency meets all obligations outlined in the agreements, including providing necessary support for the student volunteer's assignment.
4. Services and Staff Offices are responsible for:
 - a. Ensuring eligible educational institutions are aware of GSA's willingness to consider students for volunteer service assignments by conducting equitable and inclusive outreach efforts.
 - b. Evaluating the proposed student volunteer assignments to confirm that

- they align with the office's goals and capacities.
- c. Determining whether the objectives of the volunteer assignment can be met within their organization and assess the feasibility of the time commitment.
 - d. Engaging with educational institutions to formalize volunteer assignments and approve the agreements.
 - e. Upholding and fulfilling the agency's responsibilities as specified in the volunteer agreements.
 - f. Maintaining accurate and up-to-date attendance records for student volunteers, ensuring documentation aligns with the program's reporting requirements.
 - g. Completing the Student Volunteer Evaluation Report (Appendix D) at the end of the student's volunteer assignment.
5. The Processing and Personnel Records Management (PPRM) office is responsible for:
- a. Maintaining records on all students who have completed the SERVICE program.
 - b. Responding to requests for information on students who have completed the SERVICE program.

General Provisions:

The services provided by the students accepted for SERVICE should only be used as an enhancement to GSA's workforce and not a substitution for filling designated positions. The same restrictions regarding employment of relatives apply to the selection of student volunteers although they are not considered "employees."

Eligibility:

To be eligible for a SERVICE assignment, a student must:

1. Meet the minimum age requirements specified by Federal, State, or local laws regarding the employment of minors. Participation is limited to students who are U.S. citizens, at least 16 years of age;
2. Be a student as defined in Definitions, Section 3;
3. Be accepted by GSA as a SERVICE participant; and
4. Demonstrate a firm intention of continuing enrollment at the same or a different educational institution during the school term immediately following the completion of volunteer services.

Uncompensated Service:

Students in volunteer services assignments are not compensated for their work. Additionally, students in volunteer services assignments are not allowed payment for travel, transportation, subsistence allowance, quarters, tuition, academic fees, books, or any other reimbursement or payment.

Status:

Students accepted to perform volunteer service are not considered to be Federal employees for any purpose other than:

1. Under laws related to the Federal Tort Claims Act provisions published in [28 USC 2671 through 2680](#). Claims arising from student participation shall be administratively processed in accordance with regulations of the Department of Justice and applicable GSA procedures; and
2. Injury compensation under [5 USC, chapter 81](#) for injuries sustained during the period of volunteer services. Claims related to injuries shall be referred to the Office of Workers' Compensation Programs (OWCP), U.S. Department of Labor, for adjudication in accordance with GSA procedures.

Relationship to Other Student Programs:

1. Each student program should be used in the manner intended. Each program has specific objectives which should receive agency support. As a reminder, Pathways Programs are intended to provide entry to careers in the Federal service. The volunteer program was designed to enrich students' educational programs and the educational process. Volunteers may be used to supplement, but not take the place of, personnel hired through the usual employment procedures. Therefore, they should not be assigned to a position description. The duties assigned must not be substantial enough to justify or resemble those of a part-time or full-time position.
2. Hiring of Interns NTE during traditional summer months should not be curtailed due to an organization's use of student volunteers. GSA will continue to participate in all student programs to support agency mission, goals, workforce needs and will utilize the appropriate hiring authority or volunteer program.

Program Requirements:

The following items are required for the implementation of the Volunteer SERVICE Program:

1. **Outreach and Promotion.** Eligible educational institutions must be informed of GSA's willingness to consider students for volunteer service assignments. Services and Staff Offices intending to host student volunteers must conduct outreach. Outreach efforts may include posting on school career websites, participating in career fairs, and using professional platforms such as LinkedIn and Handshake. The selection process for volunteer assignments must be managed to ensure fairness and transparency, with oversight to verify that opportunities are shared broadly among potential candidates.
2. **Student Inquiry.** Students may independently apply for volunteer assignments with GSA, regardless of enrollment at institutions where opportunities are publicized. To be considered, students must meet all eligibility criteria and submit:
 - a. Resume
 - b. Cover letter specifying areas of interest
 - c. Most recent transcript or grade record (unofficial copies are acceptable initially; official transcripts are required before starting service).
3. **Educational Institution Inquiry.** Educational institutions may inquire about available volunteer assignments. All inquiries must be reviewed and assessed for completeness. If insufficient information is provided, additional details should be requested from the institution to properly evaluate the proposed assignment.
4. **Services and Staff Offices Placement.** The Staffing Services Section of the HR Services Staffing Services Center will coordinate with customer offices to determine the most appropriate placement for student volunteers. Services or staff offices must evaluate their ability to host the volunteer and decide whether to proceed. The following process applies to both institutional and student-initiated inquiries:
 - a. If the assignment is accepted, GSA will notify the educational institution or student with details, including the name of the supervising individual and the educational institution may be invited to negotiate an agreement.
 - b. If the assignment is declined, reasons for the decision will be communicated to the requester.
5. **Agreement Preparation.** The hosting office will be responsible for negotiating the provisions of the agreement. The following activities should occur:
 - a. The hosting office must designate an employee to supervise the student volunteer and prepare a draft of the agreement.
 - b. The hosting office negotiates the provisions of the draft agreement with the educational institution.
 - c. Efforts should be made to accommodate, where feasible, the educational institution's requests and requirements during the negotiation process.
 - d. While there is no regulatory restriction on the duration of a period of

volunteer service or number of volunteer assignments one individual may perform, an estimate of the amount of time during which the student's services will be needed should be identified in the agreement. The duration of the volunteer service should coincide with the school course or educational project and agency need with which it is associated.

- e. Upon satisfactorily negotiating the agreement, the required signatures will be obtained.
- f. The Servicing HR Specialist will notify the student of their selection and coordinate the necessary arrangements to initiate the volunteer assignment.

Suitability Requirements:

1. The service or staff office will identify the sensitivity of the materials and workplace in which a proposed assignment will occur. The service or staff office will work with the National Classification Center (NCC) team to gain approval of the unclassified duties.
2. Once approved by the NCC; the servicing HR Specialist will initiate a background investigation request from the Personnel Security Division. This will include initiating the GCIMS process. The HR Specialist will also submit the following documents to GSA.SecurityOffice@gsa.gov: OF-306, GSA 3665, Security Transmittal and MSO/GCIMS printout (electronic prints).
 - a. Depending on the nature and length of the assignment there may not be enough time for the volunteer to complete the background investigation process. As a minimum, the volunteer will need to complete the Criminal History portion of the process to get unescorted access or a PIV Card while the background investigation is being conducted. However, if the volunteer does not complete the Criminal History portion of the process, they would not be granted access to GSA's information technology systems and must be escorted at all times.
 - b. If the nature of the assignment, materials or workplace to be accessed would normally require a background investigation as a condition of employment, the service or staff office may decline to sponsor the volunteer assignment or may request the appropriate background investigation.
3. The personnel security officer's written approval shall affirm or waive the need for a background investigation.

4. The service or staff office in which the assignment occurs shall bear the expense of the background investigation if it elects to host the assignment.

Documentation and Recordkeeping:

1. Student volunteers do not receive appointments in the Federal service. A Standard Form 50 cannot be used to document volunteer service.
2. The HR Specialist is responsible for providing the employee with the Standards of Conduct and ensuring the signed acknowledgment form is completed and received.
3. The documentation of volunteer service will include a Student Volunteer Services Agreement (see Appendix A).
4. At the conclusion of the volunteer service agreement, the signed acknowledgement of Standards of Conduct, documentation of the dates of service, the total hours or days worked, and guidance on how GSA may be contacted regarding future requests to obtain documentation of the volunteer service, will be sent to the student by the supervisor.
5. In accordance with the [Guide to Processing Personnel Actions \(GPPA\), Chapter 33, Documentation of Volunteer Service](#), the Processing and Personnel Records Management (PPRM) will maintain records on students who have completed the SERVICE program. These records will include, at a minimum, a copy of the Student Volunteer Services Agreement, the total hours or days worked, and information on and evaluation of the projects or work assignments completed during the student volunteer assignment. Such records will be maintained for a period of 3 years.

Appendix A

Template Agreement Student Volunteer Service Agreement

In accordance with the provisions of 5 U.S.C. 3111, the General Services Administration (GSA) and **[name of the educational institution]** enter into this agreement to provide for the acceptance of the volunteer (unpaid) services of **[student's name]** from **[date]** to **[date]**. See attached schedule.

The volunteer services of **[student's name]** are accepted by the General Services Administration to **[insert a description of the project(s)/work assignment(s) the student shall accomplish during the specified time frame or attach additional pages]**.

In accepting the services of **[student's name]**, the **General Services Administration** agrees to:

1. Maintain and provide to **[name of the educational institution]** the attendance record of **[student's name]**;
2. Evaluate and furnish **[name of the educational institution]** with evaluations of the student's performance; and
3. Provide **[student's name]** with necessary materials, information, and a working space within the limitations of current regulations, laws, and safety considerations.

In instituting the volunteer services agreement, the **[name of the educational institution]**:

1. Certifies that **[student's name]** is at least a half-time student as defined by its academic regulations;
2. Acknowledges the right of the General Services Administration to terminate this agreement for cause before the completion of the assignment.

By accepting the volunteer services agreement, I, **[student's name]** understand that I will receive no pay for my services and that I am not considered a Federal employee except for any purpose other than for purposes of the Federal Tort Claims provisions published in 28 U.S.C., 2671 through 2680 and Title V, U.S.C., Chapter 81, relative to compensation for injuries sustained during the performance of work assignments. I agree to:

1. Obey the rules and regulations of the Federal Government and the General Services Administration and to comply with the GSA Standards of Conduct.
2. Complete all mandatory training requirements.

3. Continue to pursue a course of study or training after the student volunteer assignment.
4. Notify the designated person regarding any deviations or absences from the scheduled volunteer services work period.
5. Provide GSA with a copy of the projects or work assignments completed during the student volunteer assignment and any requested reports or evaluations regarding these projects or work assignments.

We, the undersigned, accept the provisions of this agreement and agree to negotiate matters that occur which are not covered by this agreement.

_____ Date: _____
Educational Institution
Representative

_____ Date: _____
Hosting Office
Management Official

_____ Date: _____
Servicing HR Specialist

_____ Date: _____
Student

Appendix B
Work Schedule Template

Student Name: _____

Approved Work Schedule:

Day	Start time	End time	Number of Hours
Monday			
Tuesday			
Wednesday			
Thursday			
Friday			

Assignment Supervisor Signature: _____

Printed Name: _____

Title: _____

Organization: _____

School Representative Signature: _____

Printed Name: _____

Title: _____

Educational Institution: _____

Appendix C Attendance Record Template

Student Volunteer Attendance Record – Biweekly Timesheet (make additional copies as needed and insert number of hours in appropriate cell to document attendance in accordance with established schedule identified in agreement.)

Volunteer Name: _____

Organization: _____

Week of: **[DATE]** through **[DATE]**

Month_Year: _____

Day/Date	Start time	End time	Number of Hours
Mon_mm/dd			
Tue_mm/dd			
Wed_mm/dd			
Thu_mm/dd			
Fri_mm/dd			
Mon_mm/dd			
Tue_mm/dd			
Wed_mm/dd			
Thu_mm/dd			
Fri_mm/dd			

Submitted by: (Student) _____ Date: _____

Certified by: _____ Date: _____

Printed Name: _____

Title: _____ Organization: _____

Appendix D
Student Volunteer Evaluation Report and
Documentation of Completion of Service
(attach additional pages as necessary)

Student Volunteer's Name (First, MI, Last): _____

Service Period Covered

From: _____ To: _____

Total Hours: _____

Service Location (Office /Division and Address): _____

1. Brief description of work assignment(s), including meetings attended, and other activities.

2. Skills and knowledge gained during this service period.

3. Evaluation factors*

- ☐ Student satisfactorily performed his/her responsibilities
- ☐ Student's conduct was professional
- ☐ Student was punctual
- ☐ Student showed willingness to learn
- ☐ Student displayed initiative
- ☐ Student interacted appropriately with supervisor, other staff members and customers

*Note: These are suggested "evaluation factors." Evaluation factors may vary according to the purpose and nature of the volunteer assignment. If the volunteer service is for academic credit, the educational institution should identify the goals of the assignment and any required performance elements.

4. Comments:

Signature: _____ Date: _____

Name of designated supervisor: _____

Title: _____