



PERKINS PLAN

2024-25 GRANT GUIDELINES

Workforce Education Development
Washington State Board for Community and Technical Colleges
PO Box 42495
Olympia, WA 98504
[SBCTC.edu](https://www.sbctc.edu)

The Washington State Board for Community and Technical Colleges reserves the right to make changes to this document due to, but not limited to, federal, state, or local legislation or policy changes.

Deadlines and Milestones

Grant Deadline/Milestone	Dates (subject to change)
Applications available in OGMS	February 29, 2024
Applications due in OGMS	April 11, 2024
Applicants notified of approval status	Late June 2024
Grant begins	July 1, 2024
Final budget revision deadline	June 15, 2025
Projected end date of grant	June 30, 2025
Report of Accomplishment due	July 31, 2025

Note: Invoicing due dates are found in the [Invoicing](#) section.

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Overview

The purpose of the Perkins Act is to prepare students to enter the workforce with the academic and vocational skills needed to compete successfully in a knowledge and skills-based world economy. Perkins supports career and technical education that prepares students both for further education and the careers of their choice. Perkins funds help ensure that career and technical programs are challenging and integrate academic and technical education to meet the needs of business and industry.

Applicant Guidelines

Who May Apply

Eligible community and technical colleges in Washington state receive Perkins funding based on a "Pell-Plus" formula.

Funding

The first 90 percent of funds that are distributed to the colleges are based on the "Pell Plus" formula. This formula is based on enrollment data of unduplicated students with a professional/technical intent who are Pell/BIA, Worker Retraining, Opportunity Grant, Washington College Grant, WorkFirst, and BFET recipients enrolled with a vocational intent from the two years preceding the current fiscal year award. (Example: Fiscal year 2025 awards are based upon academic year 2022-2023 enrollment data.) Numbers used are unduplicated headcount, one-year numbers with no caps.

The remaining 10 percent of Perkins funding is divided with nine percent for rural schools and one percent for schools with a high percentage of professional/technical students. All funds are intended to support work that meets federal Perkins requirements, state goals, and local priorities. The required and permissible uses of Perkins funds are listed in [Appendix C](#).

How Does the Provider Apply

Eligible colleges may access the 2024-25 Perkins Grant Application through the Online Grant Management System ([OGMS](#)). This grant is open to community and technical colleges in Washington State as defined under [RCW 28B.50.030](#).

If you do not have an account, contact your organization's [Security Contact](#) for access; you will also need your Security Contact to give you permission for FY25.

Submit completed grant applications for continuation of funding to the SBCTC through OGMS no later than April 11, 2024, at 11:55 p.m. SBCTC staff is available for assistance until 4:00 p.m. on April 11, 2024.

Review Process

Applications will be reviewed by SBCTC staff and approved or returned to colleges for revision in late May. College revisions to applications should be returned promptly. All plans must be substantially approvable before July 1, 2024.

Attachments are used for the Assurances and the Program of Study Verification Form.

Accountability

State policy and local planning must reflect an increased emphasis on accountability and the use of data to direct improvements.

Comprehensive Local Needs Assessment

Perkins V requires a Comprehensive Local Needs Assessment (CLNA) to be conducted on a biennial basis, the results of which must be incorporated into the local application. The final CLNA will be submitted with the FY25 Perkins Plan application and must inform budget requests. The CLNA is intended to be a part of college's strategic planning process focusing on holistic strategies to decrease equity gaps for students and improve CTE programs. Colleges are required to engage a diverse group of stakeholders. Refer to the [resource guide](#) for more information.

Monitoring

The State Board for Community and Technical Colleges is responsible for oversight of the operations of the Federal award supported activities. SBCTC may schedule monitoring visits during and after the grant period to evaluate the fiscal progress and performance of the program and provide technical assistance. The purpose of monitoring is to ensure regulatory and contractual compliance on the part of grant recipients. To ensure compliance with grant requirements and to ensure that financial records support program expenditures, SBCTC staff will schedule desk audits, on-site, and online visits.

Performance Indicators

SBCTC is directed by the Workforce Training and Education Coordinating Board (WTECB) to negotiate levels of performance with local colleges. Local colleges will either accept the state performance levels for Performance Indicators 1P1, 2P1, and 3P1 or negotiate with the SBCTC on new local levels (reference [Perkins V Legislation](#) Section 113.4.A) If the local college fails to meet at least 90 percent of a performance level on any indicator, they must develop and implement an improvement plan.

Performance Indicator	Definition ¹	Reporting Year 21-22
Indicator 1P1	The percentage of CTE concentrators who, during the second quarter after program completion, remain enrolled in postsecondary education, are in advanced training, military service, or a service program that receives assistance under title I of the National and Community Service Act of 1990, are volunteers as described in section 5(a) of the Peace Corps Act, or are placed or retained in employment.	39.5%

¹ Perkins V Cohort Table Data Dictionary (sbctc.edu)

Performance Indicator	Definition ¹	Reporting Year 21-22
Indicator 2P1	The percentage of CTE concentrators who receive a recognized postsecondary credential during participation or within 1 year of program completion.	53.5%
Indicator 3P1	The percentage of CTE concentrators in career and technical education programs and programs of study that lead to non-traditional fields.	19.0%

¹The request to adjust performance targets, based on impacts of the pandemic and prior year's performance, were submitted to Workforce Training and Education Coordinating Board (WTECB) in December 2021. The motion to approve the modified 1P1 and 2P1 targets were accepted during the April 2022 WTECB meeting.

If you have any questions regarding Perkins Performance Indicators or the planning process, please contact [Kimberly Ingram](#), Program Administrator, at (360) 704-3988.

Reporting

The link to complete and submit the 2023-24 Perkins Report of Accomplishments will be posted on the SBCTC website and emailed. A final report must be submitted to the SBCTC no later than July 31, 2025. The Report of Accomplishment will be submitted online through a digital platform (Google Forms, SurveyMonkey, etc.) and not submitted through OGMS.

Terms and Special Conditions

The following information is included in the Perkins Plan Award Letter that is created after an application is approved.

1. Follow all state and federal policies to uphold Perkins grant compliance.
2. Implement and scale equity-focused, comprehensive, and innovative college and career pathways to accelerate student completion and advance racial and economic justice.
3. Guide and support culturally responsive and equity-focused instructional practices that accelerate student completion to certificates, degrees, and living wage employment.
4. Develop and offer culturally responsive career pathways leading to CTE dual credit, postsecondary education, and living wage employment.
5. Use Perkins Protected Dashboard and train appropriate staff in utilization of this data to complete all required applications, Comprehensive Local Needs Assessment, and reports.
6. Adhere to all Perkins and Workforce grant fiscal guidelines, including time & effort requirements, published by the federal government, the State of Washington and the State Board for Community and Technical Colleges.
7. Authorize SBCTC to utilize CLNA and Perkins reports and content to inform system initiatives.
8. Must submit application and its revisions, CLNA, annual reports, budget revisions, budget invoices, and monitoring documents by published deadlines.
9. Notify State Board for Community and Technical Colleges of any changes to Perkins staff at the colleges.
10. Colleges must meet or exceed the state targets for performance indicators. Perkins funds need to support performance indicator gaps.

Disclaimer

SBCTC reserves the right to refrain from granting to any or all applicants. Additionally, SBCTC reserves the right to add additional grant requirements to applicants meeting minimum criteria to receive funds but that are deemed to be higher risk grantees. Additional requirements may include, but are not limited to, additional reporting requirements or additional monitoring to assess the applicant's ability to adhere to grant requirements. Any additional requirements will be outlined for individual applicants prior to applicants accepting any resulting grant funding.

Budget & Invoicing Guidance

Budget Activities

The following list identifies all eligible Perkins program components by activity (also known as a budget line or line item).

Required & Permissive Uses

All funds are intended to support work that meets federal Perkins requirements, state goals, and local priorities. See [Appendix C: Required and Permissive Uses of Perkins Funds](#) and [Allowable](#) and [Unallowable](#) Costs sections for a complete list of required and permissive uses of Perkins funds.

Administration

Administration is defined as activities necessary for the proper and efficient performance of eligible recipient's duties under the Act, including supervision, but does not include curriculum development activities, personnel development, or research activities.

No more than 5% of the grant may be used for administrative purposes including approved indirect/facilities & administration (F&A) costs. The allowable variance of 10% per budget cell does not apply to budgeted amounts in the Administrative activity.

Budget Categories

Based on the budget activities above, you must determine how much of each activity will be budgeted in each budget category (also known as a budget column). The following is an overview of each budget category.

Salaries, Wages, and Benefits

Salaries and benefits for staff and faculty who work with Perkins activities.

In your budget narrative, please be sure to include all positions to be funded by the grant, percentages of effort/FTEF, salary, and/or hourly wage information, benefits, and a brief description of duties by position as they relate to the grant. Please refer to [Appendix F](#) for guidance on determining the FTE/FTEF percentages and salary/wage allocations.

Please put each position on a new line of text.

Examples:

Career Services Counselor: 50% FTE = Salary: \$25,000, Benefits: \$11,250. Advises CTE

students, provides in-class career exploration activities, and serves as a liaison between program leads and business/industry partners.

- 10 faculty stipends at \$1,000 each for curriculum development = \$10,000
- Disability Specialist: 0.40 FTE = Salary: \$24,000, Benefits: \$12,000. Provides recruitment, retention, counseling, and other support services for disabled CTE students.
- CTE Faculty for 40 hours at \$35/hour = Salary: \$1,400 total, Benefits: \$560. Participation in an industry-based professional development experience.

Goods and Services

Goods: Items with an individual acquisition cost of less than \$5,000 or a useful life of less than one year necessary to carry out Perkins activities.

Examples: tools, computers, office supplies, postage, printing

Services: Services of a routine nature necessary for carrying out Perkins activities.

Examples: interpreter services, interagency agreements (contracts between two or more state agencies)

The cost of any items purchased that will not be used exclusively for Perkins must be split amongst other funding sources.

Non-consumable items purchased shall remain in the property of the grant recipient and are subject to the “Purchased Items” terms in this document.

Funds may not be used to acquire equipment (including computer software) that results in a direct financial benefit to any organization representing the interest of the acquiring entity or its employees or any affiliate of such an organization.

Please refer to [Appendix E](#) regarding Conferences, Meetings, and Food guidance.

Building Rental & Utilization

For the building rental or utilization of space in support of Perkins activities. Building rental and costs must be calculated at or below fair market value (FMV). Please verify that they are at or below FMV in your budget narrative.

Example: Rental of space at WorkSource for One-Stop activities

Travel

Expenditures for transportation, meals, hotel, and other expenses associated with traveling related to allowable grant activities. Reimbursement for travel costs must be within OFM travel rates and regulations which can be found in the State Administrative and Accounting Manual ([SAAM](#)), [Chapter 10.90](#). Please note, when the grant recipient (the college or CBO) reimburses travel under this grant using state funds, the same OFM travel rates and regulations must be applied.

Examples: Travel to applicable professional development activities, travel for

outreach/recruitment of CTE students

NOTE: In limited circumstances, Perkins funds may be used to support student travel for technical skill competitions or student convention/conferences. Funds may only be used for these types of activities if the costs are:

1. Related to a student organization that is an integral part of the curriculum.
OR
2. Part of a larger program to serve special populations or non-traditional students.

Contracts

Professional or technical services provided by a consultant (contractor) to accomplish a specific study, project, task, or other work statement. Rules that apply to the grant recipient (the college or CBO) under this grant must also be applied to the contractor.

Examples: Contracted personnel to provide skills standard expertise, contracted trainer for professional development of CTE faculty or staff

Note: Interagency agreements (contracts between two or more public entities) are considered services and should be budgeted and invoiced in the “goods and services” category.

Capital Assets

Capital assets are defined as property or equipment with a useful life in excess of one (1) year and a per unit acquisition cost of \$5,000 or more. Equipment purchased with grant funds shall remain the property of the grant recipient and their inventory control. All capital assets purchased with funds from this grant must be approved in OGMS (for applications) or OBIS (for revisions) by the SBCTC *prior to purchase*.

Examples: Baking oven for culinary arts program, automotive lift, machine shop lathe

Funds may not be used to acquire equipment (including computer software) that results in a direct financial benefit to any organization representing the interest of the acquiring entity or its employees or any affiliate of such an organization.

Tuition & Student Fees

Tuition and fees can be paid for students who are members of special populations or non-traditional training and employment activities for students. All of the following conditions must be met:

- Recipients must be individuals who are members of special populations who are participating in career and technical education (CTE) programs that are consistent with the goals and purposes of Perkins V.
- Assistance may only be provided to an individual to the extent that it is needed to address barriers to the individual's successful participation in CTE programs.
- Direct financial assistance for individuals must be a part of a broader, more generally focused effort to address the needs of individuals who are members of special populations. Direct assistance is not, by itself, a program for special populations. It should be one element of a larger set of strategies designed to address the needs of special

populations.

- Funds must be used to supplement, and not supplant, assistance that is otherwise available from non-federal and other federal sources.
- Grant funds may not be given directly to a student.
- See [Guidelines for Utilizing Perkins Grant Funding for Direct Assistance to Students](#) for additional information.

The amount of Perkins funding used for tuition and fees should be very limited. Thus, it would not be a reasonable and necessary expenditure under Sections 135(b)(5)(S) or 224 of Perkins V for this grant to utilize a substantial portion of funds to provide direct assistance, such as tuition and fees, to special populations students. ***Most of these grant funds should be used for program costs rather than direct assistance to students.***

Indirect/Facilities & Administration (F&A)

To cover such costs as operation, maintenance, library, and student administration expenses that cannot be clearly allocated to an individual program.

Calculate the indirect amount as 8% of Modified Total Direct Costs (MTDC) or the **restricted** indirect rate negotiated with the organization's cognizant agency. MTDC means all direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel, and up to the first \$25,000 of each subaward.

Modified total direct costs (MTDC) excludes:

1. Equipment
2. Capital expenditures
3. Patient care charges
4. Rental costs
5. Tuition remission
6. Scholarships and fellowships
7. Participant support costs
8. The portion of each subaward in excess of \$25,000

[2 CFR Title I, Chapter II, Parts 200.1](#)

Indirect may be budgeted at no more than 8% of MTDC for the grant. Indirect charges must be based on actual expenses. The allowable variance of 10% per budget cell does not apply to the amount budgeted in the indirect budget cell.

Budget Revisions

SBCTC approval of a revised budget is required if there is more than a 10% variation in expenditure

levels for any individual budget cell.

Budget revisions must be submitted to SBCTC via the Online Budget & Invoicing System ([OBIS](#)).

Final budget revision deadline: June 15, 2025

See the OBIS user manual (available in the Resources section of OBIS) for information on how to create and submit a budget revision. Be sure to update budget narrative answers as applicable.

Invoicing

Funds for this grant must be claimed on a reimbursement basis. No payments in advance of or in anticipation of goods or services provided under this grant shall be requested or paid. All costs must be reported for the period incurred.

Reimbursement requests must be submitted at least quarterly, but not more than monthly via [OBIS](#). All costs must be submitted for reimbursement in accordance with the schedule shown below.

For expenses incurred	Invoice no later than
July – September	October 31, 2024
October – December	January 31, 2025
January – March	April 30, 2025
April – June	July 15, 2025

Grant Terms & Information

General

Funding for the Perkins grant is provided through Title I of the Strengthening Career and Technical Education for the 21st Century Act (Perkins V). Funds are provided to the State Board for Community and Technical Colleges (SBCTC) through the Workforce Training and Education Coordinating Board (WTECB) from the U.S. Department of Education under Assistance Listing Number/CFDA 84.048.

Allowable Costs

All expenditures submitted for reimbursement under this grant must be necessary and reasonable for proper and efficient administration of the Perkins program.

Allowable costs are determined by 2 CFR Subpart E (parts 200.400-475).

The following state and federal regulations must be followed:

Applicable Washington State Regulations

The State Administrative and Accounting Manual ([SAAM](#))

Applicable Federal Regulations

[2 CFR Part 200](#) (Uniform Administrative Requirements, Cost principles, and Audit Requirements for

Federal Awards)

[Public Law 115-224](#) (Strengthening Career and Technical Education for the 21st Century Act)

Capital Assets

Capital assets are defined as any item with a useful life in excess of one year and a per unit cost of \$5,000 or more. (This is the federal definition of “equipment.”)

All capital assets purchased with funds from this grant must be approved in OGMS (for applications) or OBIS (for revisions) by the SBCTC *prior to purchase*.

Costs for capital assets that will be used by programs in addition to Perkins must be split based upon the percentage of use by Perkins and the other program(s).

** Items with a per unit cost of \$5,000 or more must typically be “special purpose” equipment.*

Funds from this grant typically can’t be used to purchase general purpose items with a per unit cost of \$5,000 or more. Definitions from 2 CFR 200:

“Special purpose equipment” means equipment which is *used only for research, medical, scientific, or other technical activities*. Examples of special purpose equipment include microscopes, x-ray machines, surgical instruments, and spectrometers.

“General purpose equipment” means equipment, which is *not limited to research, medical, scientific, or other technical activities*. Examples include office equipment and furnishings, modular offices, telephone networks, information technology equipment and systems, air conditioning equipment, reproduction and printing equipment, and motor vehicles.

Purchased Items – Tracking

All non-consumable items purchased with grant funds shall remain the property of the grant recipient. “Small and attractive” items and items with a per unit acquisition of \$5,000 or more and a useful life more than one year must be under inventory control.

Purchased Items – Disposal of Items

The price initially paid for an item determines which category it falls into below.

Equipment (Capital Assets):

When a grant recipient’s Perkins program no longer has a use for equipment that had an original per unit acquisition cost of \$5,000 or more and a useful life in excess of one year, they may be offered to another federal program at the recipient’s college at no cost.

[2 CFR 200.313 \(c\)\(1\)](#):

When no longer needed for the original program or project, the equipment may be used in other activities supported by the Federal awarding agency, in the following order of priority:

- (i) Activities under a Federal award from the Federal awarding agency which funded the original program or project, then

- (ii) Activities under Federal awards from other Federal awarding agencies. This includes consolidated equipment for information technology systems.

If the equipment is not needed for another federal program, the grant recipient must contact SBCTC before disposing of the equipment. ***Grant recipients must not sell or surplus the equipment before consulting with SBCTC staff.***

Per 2 CFR 200.313 (e)(2), if a grant recipient no longer has a need for equipment purchased from a federal grant, the grant recipient must contact the federal agency where funding originates to request disposition instructions. SBCTC will assist with this. If the federal agency allows the grant recipient to sell the equipment and the current fair market value of the equipment is more than \$5,000 per unit, the proceeds must be returned to the federal agency minus selling and handling expenses of \$500 or 10% of the proceeds, whichever is less. Contact [SBCTC](#) for assistance.

Supplies:

Per [2 CFR 200.314](#), when a grant recipient's Perkins program no longer has a need for supplies with an aggregate value of more than \$5,000, they may be offered to another federal program at the recipient's college at no cost. If the supplies are not needed for another federal program, they can be sold or transferred to a non-federal program. If the supplies are sold or transferred, the value must be returned to the federal agency where the funds originated. The SBCTC will assist in the return of funds. Please contact [SBCTC](#) for assistance.

Unallowable Costs

The following costs are explicitly disallowed:

- Costs that would otherwise be considered supplanting, such as operational costs for services, staff, programs, or materials that would otherwise be paid with state or local funds; any expense that was previously paid by state or local funds such as, but not limited to, salaries, books, tuition, or equipment
- Work study costs
- Costs to support baccalaureate programs
- Administrative or supervisory costs that exceed 5% of grant funds allowed for administering Perkins
- General consumables not related to specific career and technical education (CTE) programs. This includes items or services, used for administrative purposes, which would otherwise be purchased by the college with local or state funds (see prior bullet on supplanting). Examples include, but are not limited to, printer paper, toner, general purpose furniture, file cabinets, maintenance costs for general purpose equipment or buildings, insurance, phones or computers for individual or office use, etc. Funding may be used to support a specific CTE program for some items (i.e. laptops, tablets, desktop computers, smart boards, and adaptive technology), provided the items are required for instruction, simulated activities, or equitable student support.
- Purchase or lease of passenger vehicles including vehicles such as automobiles, trucks, buses, utility vehicles, airplanes, boats, and golf carts
- Purchasing, constructing, renovating, or remodeling of facilities or building, including CTE classrooms, laboratories, or college facilities

- CTE faculty or staff conference travel unrelated to CTE program improvement
- Light refreshments and food outside the restrictions issued in the Memorandum from the US Department of Education Office of the Chief Financial Officers ([Appendix E](#))
- Bad debt expenses
- Payment to any person for influencing, or attempting to influence, an officer or employee of any agency, member of Congress, an officer or employee of Congress, or an employee of a member of Congress, in connection with the awarding of a federal contract, continuation, renewal, amendment, or modification of any federal contract, grant, loan, or cooperative agreement
- Legislative expenses such as lobbying
- Sectarian worship, instruction, or proselytization
- Promotional items and memorabilia including but not limited to tote bags, key chains, apparel, t-shirts, pens, magnets, banners, folders, models, gifts, and souvenirs, etc. (2 CFR 200.421(e)(3))
- Costs of advertising and public relations designed solely to promote the non-Federal entity
- Unallowable advertising and public relations costs include the following:
 - Costs of advertising media and corollary administrative costs. Advertising media include magazines, newspapers, radio and television, direct mail, exhibits, electronic or computer transmittals, and the like.
 - The only allowable advertising costs are those which are solely for:
 - Program outreach and other specific purposes necessary to meet the requirements of the Federal award. Recruitment materials such as mailings, brochures, and advertisements must include relevant information on program offerings, career pathways, support services, advising and application resources, etc.
- Commencement and convocation costs (2 CFR 200.429)
- Contributions and donations (2 CFR 200.434(a))
- Student activity costs unless specifically provided for in the grant award (2 CFR 200.469)
- Career and technical student organization (CTSO) expenses including, but not limited to, lodging, food, and transportation, which are not directly related to career preparation or skills acquisition or demonstration. Expenses for curriculum-aligned conferences or competitions, for instance, are allowable, while those related to general meetings, social gatherings, meals, and general supplies or marketing are expressly prohibited.

Debarment and Suspension

The grant recipient agrees that it is not debarred or suspended or otherwise excluded from or ineligible for participation in federal assistance programs under Executive Order 12549, “Debarment and Suspension” and that the recipient will not contract with a subcontractor that is

debarred or suspended.

Expenditure Accounting

These funds must be kept in an account separate from all other funding sources.

For colleges, these funds must be set up as a cost-reimbursement/as-incurred grant and be accounted for as grant and contract (fund 145).

SBCTC reimbursement for this grant must be coded to 4020120.

Set up this grant using the following information:

- **Grant Type:** As Incurred/Cost Reimbursable
- **Sponsor ID:** FIN00107
- **CFDA/Assistance listing:** Starting in **FY25** - do **NOT** enter the CFDA/Assistance Listing Number in ctcLink for grants from SBCTC
- **F&A Distribution Department:** 98219
- **F&A Rate Type:** IND
- **F&A Base Budget:** SALRY
- **FA Rate %:** 8% of MTDC or the **restricted** indirect rate negotiated with the organization's cognizant agency
- **Project Type:** 02012
- **Fund:** 145
- **Class:** See [NACUBO Code section for suggestions](#)
- **Revenue Account:** 4020120
- **Contract Asset Account:** 1010180

NACUBO Code

The following are suggested National Association of College and University Business Officers ([NACUBO](#)) codes. Colleges may use other codes as appropriate.

- **Required & Permissible Uses budget line:** 145 or 165
- **Performance Indicators budget line:** 145 or 165
- **Administration budget line:** 143

Instruction

Perkins funds are intended to supplement state funding in support of eligible students and qualifying career and technical programs. When Perkins funds are used to fund the full cost of a

new career and technical class, those costs must be accounted for as grant and contract (fund 145) along with any student enrollments generated by the Perkins funded class. Accordingly, those enrollments may not be counted towards the state FTE allocation. Perkins funding used for direct instruction is limited to not more than the first three years of a new program.

In addition, federal regulations require course fees, for classes funded by Perkins, be accounted for as program income. These course fees would need to be the first source of funds used to pay class costs thereby reducing the costs that can be charged to the Perkins grant (2 CFR 200.307(e)(1)).

Non-Discrimination

No individual shall be excluded from participation, denied the benefits of, subjected to discrimination under, or denied employment in the administration of or in connection with any such program because of race, color, religion, sex, national origin, age, handicap, or political affiliation or belief.

Colleges need to “ensure that members of special populations will not be discriminated against on the basis of their status as members of special populations” (Section 134(b)(5)(D)).

Program Income

Grant recipients may use program income generated with Perkins funds in addition to their federal grant as described in 2 CFR 200.307(e). These funds must be used for any activities authorized under the grant, per the Office of Career, Technical, and Adult Education (OCTAE). All program income earned must be used for Perkins-eligible expenditures before billing against the federal Perkins grant. See 2 CFR 200.305(b)(5).

An example of program income is a training program, funded by Perkins, which operates an espresso stand and sells products. The proceeds from these sales are considered to be program income.

Programs of Study

Programs of study are a requirement for eligibility to receive Perkins funding. These are expected to be developed in collaboration with secondary and business/industry partners to align with local needs and provide students with exposure and on-ramps to emerging, in-demand, high-skill, and/or high-wage professional/technical careers. According to the Strengthening Career and Technical Education for the 21st Century Act. Please see [Appendix A: Definitions of the Strengthening Career and Technical Education for the 21st Century Act](#) for more information.

Public Announcements, Disclosure of Federal Funding

When issuing statements, press releases, or other documents describing this project, the grant recipient shall clearly state:

1. The dollar amount of federal funds for the project;
2. The percentage of the total cost of the project financed with federal funds; and

3. The percentage and dollar amount of the total costs of the project financed by non-governmental sources.
4. On all printed materials: *The contents of this publication were developed with funds allocated by the U.S. Department of Education under the Carl D. Perkins Career and Technical Education Act. These contents do not necessarily represent the policy of the agency, nor should endorsement by the Federal government be assumed.*

Records Retention

Financial management systems shall reflect accurate, current, and complete disclosure of all cost expenses for grant activities. Grant recipients must maintain books and records, supported by source documentation, that sufficiently and properly reflect the source of funds and all costs expended for program purposes. These records and financial statements are subject to inspection, review, reproduction, and/or audit by SBCTC or its designee for at least six years after the dispersal of funds, the termination or expiration of the contract, or the resolution of litigation or audits related to the program, whichever is latest. Additional information on records retention may be found in Chapter 7 of the [SBCTC Policy Manual](#).

Historically, colleges have adopted a practice of only attesting that they have reviewed required documentation without maintaining copies of items reviewed. Records relating to grants, however, must be maintained in accordance with federal grant guidelines or the Washington State records retention requirements, whichever is longer.

Recordkeeping

State law and federal guidelines require that custodians of grant funds maintain records demonstrating eligibility of any recipient or participant in a program paid in full or in part by federal funds.

Along with an application outlining the criteria above, the college must supply documentation of a Pell Grant award to verify a recipient's eligibility for Perkins funds.

It is also recommended that colleges institute uniform procedures for eligibility determination for individuals that have no proof of eligibility. This population may include young adults that have not previously worked and were previously a dependent, homeless individuals, or anyone who has no work or tax filing history.

Rights in Materials

Materials, which originate from WIOA funds, shall be "works for hire" as defined by the U.S. Copyright Act of 1976 and shall be owned by the U.S. Department of Education. Materials shall include, but are not limited to, reports, documents, pamphlets, advertisements, books, magazines, surveys, studies, computer programs, films, tapes, and/or sound reproductions. Ownership includes the right to copyright, patent, register, and the ability to transfer these rights.

Size, Scope, and Quality

Pursuant to Section 135(b) of the Strengthening Career and Technical Education for the 21st Century Act, eligible community and technical colleges are expected to demonstrate in their

application that their programs are of sufficient size, scope, and quality to be effective. As outlined in the State Plan, Washington defines size, scope, and quality as follows:

Size

Eligible recipients must demonstrate that enrollment in their programs sufficiently supports and justifies the operating costs associated with them. In addition, colleges applying for funds must demonstrate that:

1. An adequate number of qualified/certified instructors and support staff are associated with the programs to provide relevant instruction, quality student support, and appropriate course sequencing; and
2. The funding and resources available to the programs sufficiently supports their technology, equipment, facilities, and personnel needs and resources associated with outreach, recruitment, and program quality.

Scope

For postsecondary applicants:

Eligible recipients must offer a combination of SBCTC-approved, credit-bearing credentials, certificates, and degrees. Components of the approval process includes a demonstration of industry need and program sustainability, course and curriculum review, development of learning objectives, and an explanation of methods of delivery and administration, the details of which are available here.

For all applicants:

It is expected that most – if not all – programs:

1. Identify and communicate pathways to future education or employment;
2. Provide CTE-specific career and educational guidance and counseling;
3. Include multiple entry and exit points;
4. Incorporate rigorous, relevant, and contextualized academic content;
5. Work in partnership to establish and communicate programs of study and dual-credit articulations to engage, recruit, and expand access to secondary students; providing them with increasingly specialized instruction leading to the attainment of postsecondary credentials of workplace value; and
6. Provide exposure to all aspects of industry and employers through work-based learning and/or training in environments that replicate the workplace by featuring industry-standard equipment or simulated exercises.

Quality

Eligible recipients must:

1. Meet or make meaningful progress towards achieving the performance targets set for the

postsecondary or secondary indicators required of Perkins V;

2. Evaluate the degree to which underrepresented students – including special populations and those in non-traditional fields – are provided with equitable access and opportunities and develop strategies for decreasing barriers and addressing achievement gaps in order to enroll and graduate a diverse cross-section of students representative of the communities in which they live;
3. Implement a comprehensive and reliable method of reviewing their programs and assessing their efficacy in preparing students for employment and alignment with the needs of industry;
4. Engage a diverse range of stakeholders in developing, evaluating, and improving their programs with an emphasis on labor market data and state or regional workforce priorities;
5. Ensure that all programs have active, well-functioning, and representative advisory committees consistent with the requirements of Perkins V and state law;
6. Demonstrate all CTE educators possess appropriate credentials and provide adequate support for faculty and staff professional development and return-to-industry opportunities to ensure that instruction and student services are current, relevant, equitable, and comprehensive;
7. Maintain in up-to-date and industry-standard equipment, technology, learning materials, and methods of delivery; and
8. Programs offered consider labor market data and must align with in-demand occupations, as defined in the Perkins V plan.

Supplanting

Federal grant funds must supplement and not supplant state or local public funds of the agency. Federal funds may not result in a decrease in state or local funding that would have been available to conduct the activity had federal funds not been received. In other words, federal funds may not free up state or local dollars for other purposes but should create or augment programs to an extent not possible without federal funds.

Termination

This grant may be terminated by the SBCTC upon giving notice in writing to the grant recipient at least thirty (30) days in advance of the date of termination. If the grant is terminated for any reason, all reports and data gathered by grant recipient prior to termination shall at the option of the SBCTC, become the property of the SBCTC. If termination shall occur pursuant to this section, reimbursement to grant recipient shall be made on the basis of work performed prior to the effective date of termination as mutually agreed upon by both parties. Determination of final adjustments, either payments or refunds, shall also be mutually agreed upon by both parties.

Termination for Cause

If for any reason, the grant recipient violates any terms and conditions of the Adult Basic Education

program, SBCTC will give the grant recipient notice of such failure or violation. Grant recipient will be given the opportunity to correct the violation or failure within thirty (30) days. If failure or violation is not corrected, this grant may be terminated immediately by written notice from SBCTC.

Savings

In the event funding from state, federal, or other sources is withdrawn, reduced, or limited in any way after the effective date of this contract and prior to normal completion, the SBCTC may terminate the grant under the "Termination" clause, without the thirty-day notice requirement, subject to renegotiation at the SBCTC's discretion under those new funding limitations and conditions

Time & Effort Reporting

Federal regulations under [2 CFR 200.430](#) require employees whose salaries are charged in whole or in part to a federal grant to keep time and/or effort reports to substantiate the charges. This also applies to employees whose salaries are used as match for the federal grant. Additional time & effort reporting information may be found [online and in OBIS under the resource tab](#).

Appendix A: Definitions of the Strengthening Career and Technical Education for the 21st Century Act

SEC. 3. [20 U.S.C. 2302] DEFINITIONS

1. **ADMINISTRATION** – The term “administration”, when used with respect to an eligible agency or eligible recipient, means activities necessary for the proper and efficient performance of the eligible agency or eligible recipient's duties under this Act, including the supervision of such activities. Such term does not include curriculum development activities, personnel development, or research activities.
2. **ALL ASPECTS OF AN INDUSTRY** – The term “all aspects of an industry” means strong experience in, and comprehensive understanding of, the industry that the individual is preparing to enter.
3. **AREA CAREER AND TECHNICAL EDUCATION SCHOOL**– The term “area career and technical education school” means–
 - A. A specialized public secondary school used exclusively or principally for the provision of career and technical education to individuals who are available for study in preparation for entering the labor market;
 - B. the department of a public secondary school exclusively or principally used for providing career and technical education in not fewer than 3 different fields that are available to all students, especially in high-skill, high-wage, or in-demand industry sectors or occupations, that are available to all students;
 - C. a public or nonprofit technical institution or career and technical education school used exclusively or principally for the provision of career and technical education to individuals who have completed or left secondary school and who are available for study in preparation for entering the labor market, if the institution or school admits, as regular students, individuals who have completed secondary school and individuals who have left secondary school; or
 - D. the department or division of an institution of higher education, that operates under the policies of the eligible agency and that provides career and technical education in not fewer than 3 different occupational fields leading to immediate employment but not necessarily leading to a baccalaureate degree, if the department or division admits, as regular students, both individuals who have completed secondary school and individuals who have left secondary school.
4. **ARTICULATION AGREEMENT**– The term “articulation agreement” means a written commitment–
 - A. that is agreed upon at the State level or approved annually by the lead administrators of–
 - i. a secondary institution and a postsecondary educational institution; or
 - ii. a sub-baccalaureate degree granting postsecondary educational institution and a baccalaureate degree granting postsecondary educational institution; and

B. to a program that is--

- i. designed to provide students with a non-duplicative sequence of progressive achievement leading to technical skill proficiency, a credential, a certificate, or a degree; and
- ii. linked through credit transfer agreements between the 2 institutions described in clause (i) or (ii) of subparagraph (A) (as the case may be).

5. **CAREER AND TECHNICAL EDUCATION**-- The term “career and technical education” means organized educational activities that--

A. offer a sequence of courses that--

- i. provides individuals with rigorous academic content and relevant technical knowledge and skills needed to prepare for further education and careers in current or emerging professions, which may include high-skill, high-wage, or in-demand industry sectors or occupations, which shall be, at the secondary level, aligned with the challenging State academic standards adopted by a State under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965;
- ii. provides technical skill proficiency or a recognized postsecondary credential which may include an industry-recognized credential, a certificate, or an associate degree; and
- iii. may include prerequisite courses (other than a remedial course) that meet the requirements of this subparagraph;
 - a. include competency-based, work-based, or other applied learning that supports the development of academic knowledge, higher-order reasoning and problem-solving skills, work attitudes, employability skills, technical skills, and occupation-specific skills, and knowledge of all aspects of an industry, including entrepreneurship, of an individual;
 - b. to the extent practicable, coordinate between secondary and postsecondary education programs through programs of study, which may include coordination through articulation agreements, early college high school programs, dual or concurrent enrollment program opportunities, or other credit transfer agreements that provide postsecondary credit or advanced standing; and
 - c. may include career exploration at the high school level or as early as the middle grades (as such term is defined in section 8101 of the Elementary and Secondary Education Act of 1965).

6. **CAREER AND TECHNICAL STUDENT ORGANIZATION (CTSO)** --

- A. **IN GENERAL** -- The term “career and technical student organization” means an organization for individuals enrolled in a career and technical education program that engages in career and technical education activities as an integral part of the instructional program.
- B. **STATE AND NATIONAL UNITS** -- An organization described in subparagraph (A) may have State and national units that aggregate the work and purposes of instruction in career

and technical education at the local level.

- C. Student Leadership organizations must be skills-oriented, provide leadership, participate in competitions, and have state or national affiliation with a recognized career leadership organization.
7. **CAREER GUIDANCE AND ACADEMIC COUNSELING** – The term “career guidance and academic counseling” means guidance and counseling that–
- A. provides access for students (and, as appropriate parents and out-of-school youth) to information regarding career awareness exploration opportunities and planning with respect to an individual's occupational and academic future;
 - B. provides information to students (and, as appropriate, parents and out-of-school youth) with respect to career options, financial aid, job training, secondary and postsecondary options (including associate and baccalaureate degree programs), dual or concurrent enrollment programs, work-based learning opportunities, early college high schools, financial literacy, and support services, as appropriate; and
 - C. may provide assistance for special populations with respect to direct support services that enable students to persist in and complete career and technical education, programs of study, or career pathways.
8. **CAREER PATHWAYS** –The term “career pathways” has the meaning given the term in section 3 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3102).
9. **CHARTER SCHOOL** – The term “charter school” has the meaning given the term in section 4310 of the Elementary and Secondary Education Act of 1965.
10. **COOPERATIVE EDUCATION** – The term “cooperative education” means a method of education for individuals who, through written cooperative arrangements between a school and employers, receive instruction, including required rigorous and challenging academic courses and related career and technical education instruction, by alternation of study in school with a job in any occupational field, which alternation–
- A. shall be planned and supervised by the school and employer so that each contributes to the education and employability of the individual; and
 - B. may include an arrangement in which work periods and school attendance may be on alternate half days, full days, weeks, or other periods of time in fulfilling the cooperative program.
11. **CREDIT TRANSFER AGREEMENT** –The term “credit transfer agreement” means a formal agreement, such as an articulation agreement, among and between secondary and postsecondary education institutions or systems that grant students transcribed postsecondary credit, which may include credit granted to students in dual or concurrent enrollment programs, early college high school, dual credit, articulated credit, and credit granted on the basis of performance on technical or academic assessments.
12. **CTE CONCENTRATOR** –The term “CTE concentrator” means –
- A. at the postsecondary level, a student enrolled in an eligible recipient who has—
 - i. earned at least 12 credits within a career and technical education program or

program of study; or

- ii. completed such a program if the program encompasses fewer than 12 credits or the equivalent in total.

13. **CTE PARTICIPANT** – The term “CTE participant” means an individual who completes not less than one course in a career and technical education program or program of study of an eligible recipient.
14. **DIRECTOR** – The term “Director” means the Director of the Institute of Education Sciences.
15. **DUAL OR CONCURRENT ENROLLMENT PROGRAM** –The term “dual or concurrent enrollment program” has the meaning given the term in section 8101 of the Elementary and Secondary Education Act of 1965.
16. **EARLY COLLEGE HIGH SCHOOL** –The term “early college high school” has the meaning given the term in section 8101 of the Elementary and Secondary Education Act of 1965.
17. **EDUCATIONAL SERVICE AGENCY** – The term “educational service agency” has the meaning given the term in section 8101 of the Elementary and Secondary Education Act of 1965.
18. **ELIGIBLE AGENCY** – The term “eligible agency” means a State board designated or created consistent with State law as the sole State agency responsible for the administration of career and technical education in the State or for the supervision of the administration of career and technical education in the State.
19. **ELIGIBLE ENTITY** –The term ‘eligible entity’ means a consortium that includes the following:
- A. Representatives of not less than 2 of the following categories of entities, 1 of which shall serve as the fiscal agent for the consortium:
 - i. A local educational agency or a consortium of such agencies.
 - ii. An educational service agency serving secondary school students.
 - iii. An area career and technical education school or a consortium of such schools.
 - iv. An Indian Tribe, Tribal organization, or Tribal educational agency.
 - v. An institution of higher education whose most common degree awarded is an associate degree, or a consortium of such institutions.
 - vi. An institution of higher education whose most common degree awarded is a bachelor’s or higher degree, or a consortium of such institutions.
 - vii. A State educational agency.
 - B. One or more business or industry representative partners, which may include representatives of local or regional businesses or industries, including industry or sector partnerships in the local area, local workforce development boards, or labor organizations.
 - C. One or more stakeholders, which may include—
 - i. parents and students;

- ii. representatives of local agencies serving out-of-school youth, homeless children and youth, and at-risk youth (as defined in section 1432 of the Elementary and Secondary Education Act of 1965 (20 U.S.C. 6472));
- iii. representatives of Indian tribes and Tribal organizations, where applicable;
- iv. representatives of minority-serving institutions (as described in paragraphs (1) through (7) of section 371(a) of the Higher Education Act of 1965 (20 U.S.C. 1067q(a)), where applicable;
- v. representatives of special populations;
- vi. representatives of adult career and technical education providers; or
- vii. other relevant community stakeholders.

20. ELIGIBLE INSTITUTION –The term “eligible institution” means –

- A. a consortium of 2 or more of the entities described in subparagraphs (B) through (F);
- B. a public or nonprofit private institution of higher education that offers and will use funds provided under this title in support of career and technical education courses that lead to technical skill proficiency or a recognized postsecondary credential, including an industry recognized credential, a certificate, or an associate degree;
- C. a local educational agency providing education at the postsecondary level;
- D. an area career and technical education school providing education at the postsecondary level;
- E. an Indian Tribe, Tribal organization, or Tribal education agency that operates a school or may be present in the State;
- F. a postsecondary educational institution controlled by the Bureau of Indian Education or operated by or on behalf of any Indian Tribe that is eligible to contract with the Secretary of the Interior for the administration of programs under the Indian Self-Determination and Education Assistance Act (25 U.S.C. 5301 et seq.) or the Act of April 16, 1934 (25 U.S.C. 5342 et seq.);
- G. a tribally controlled college or university; or
- H. an educational service agency.

21. ELIGIBLE RECIPIENT – The term “eligible recipient” means --

- A. a local educational agency (including a public charter school that operates as a local educational agency), an area career and technical education school, an educational service agency, an Indian Tribe, Tribal organization, or Tribal educational agency or a consortium, eligible to receive assistance under section 131; or
- B. an eligible institution or consortium of eligible institutions eligible to receive assistance under section 132.

22. ENGLISH LEARNER –The term “English learner” means—

- A. a secondary school student who is an English learner, as defined in section 8101 of

- the Elementary and Secondary Education Act of 1965; or
- B. an adult or an out-of-school youth who has limited ability in speaking, reading, writing, or understanding the English language and –
- i. whose native language is a language other than English; or
 - ii. who lives in a family environment in which a language other than English is the dominant language.
23. **EVIDENCE-BASED** – The term “evidence-based” has the meaning given the term in section 8101(21)(A) of the Elementary and Secondary Education Act of 1965.
24. **GOVERNOR** – The term “Governor” means the chief executive officer of a State.
25. **HIGH SCHOOL** – The term “high school” has the meaning given the term in section 8101 of the Elementary and Secondary Education Act of 1965.
26. **IN-DEMAND INDUSTRY SECTOR OR OCCUPATION** – The term “in-demand industry sector or occupation” has the meaning given the term in section 3 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3102).
27. **INDIAN; INDIAN TRIBE** –The terms ‘Indian’ and ‘Indian Tribe’ have the meanings given the terms ‘Indian’ and ‘Indian tribe’, respectively, in section 4 of the Indian Self-Determination and Education Assistance Act (25 U.S.C. 5304).
28. **INDIVIDUAL WITH A DISABILITY** –
- A. **IN GENERAL** – The term “individual with a disability” means an individual with any disability (as defined in section 3 of the Americans with Disabilities Act of 1990 (42 U.S.C. 12102)).
 - B. **INDIVIDUALS WITH DISABILITIES** – The term “individuals with disabilities” means more than 1 individual with a disability.
29. **INDUSTRY OR SECTOR PARTNERSHIP** –The term “industry or sector partnership” has the meaning given the term in section 3 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3102).
30. **INSTITUTION OF HIGHER EDUCATION** – The term “institution of higher education” has the meaning given the term in section 101 of the Higher Education Act of 1965.
31. **LOCAL EDUCATIONAL AGENCY** – The term “local educational agency” has the meaning given the term in section 8101 of the Elementary and Secondary Education Act of 1965.
32. **LOCAL WORKFORCE DEVELOPMENT BOARD** –The term “local workforce development board” means a local workforce development board established under section 107 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3122).
33. **NON-TRADITIONAL FIELDS** – The term “non-traditional fields” means occupations or fields of work, such as careers in computer science, technology, and other current and emerging high skill occupations, for which individuals from one gender comprise less than 25 percent of the individuals employed in each such occupation or field of work.
34. **OUTLYING AREA** – The term “outlying area” means the United States Virgin Islands, Guam, American Samoa, the Commonwealth of the Northern Mariana Islands, and the Republic of

Palau.

35. **OUT-OF-SCHOOL YOUTH** –The term “out-of-school youth” has the meaning given the term in section 3 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3102).

36. **OUT-OF-WORKFORCE INDIVIDUAL** –The term “out-of-workforce individual” means –

- A. an individual who is a displaced homemaker, as defined in section 3 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3102); or
- B. an individual who –
 - i. has worked primarily without remuneration to care for a home and family, and for that reason has diminished marketable skills; or
 - ii. is a parent whose youngest dependent child will become ineligible to receive assistance under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.) not later than 2 years after the date on which the parent applies for assistance under such title; and
 - iii. is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment.

37. **PARAPROFESSIONAL** –The term ‘paraprofessional’ has the meaning given the term in section 8101 of the Elementary and Secondary Education Act of 1965.

38. **PAY FOR SUCCESS INITIATIVE** –

- A. **IN GENERAL** –Subject to subparagraph (B), the term ‘pay for success initiative’ means a performance-based grant, contract, or cooperative agreement awarded by a State or local public entity (such as a local educational agency) to a public or private nonprofit entity—
 - i. in which a commitment is made to pay for improved outcomes that result in increased public value and social benefit to students and the public sector, such as improved student outcomes as evidenced by the indicators of performance described in section 113(b)(2) and direct cost savings or cost avoidance to the public sector; and
 - ii. that includes –
 - a. a feasibility study on the initiative describing how the proposed intervention is based on evidence of effectiveness;
 - b. a rigorous, third-party evaluation that uses experimental or quasi experimental design or other research methodologies that allow for the strongest possible causal inferences to determine whether the initiative has met its proposed outcomes;
 - c. an annual, publicly available report on the progress of the initiative; and
 - d. a requirement that payments are made to the recipient of a grant, contract, or cooperative agreement only when agreed upon outcomes are achieved, except that the entity may make payments to the third party conducting the evaluation described in sub-clause (II).

- iii. **EXCLUSION** –The term ‘pay for success initiative’ does not include any initiative that—
 - e. reduces the special education or related services that a student would otherwise receive under the Individuals with Disabilities Education Act; or
 - f. otherwise reduces the rights of a student or the obligations of an entity under the Individuals with Disabilities Education Act, the Rehabilitation Act of 1973 (29 U.S.C. 701 et seq.), the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.), or any other law.

39. POSTSECONDARY EDUCATIONAL INSTITUTION –The term “postsecondary educational institution” means—

- A. an institution of higher education that provides not less than a 2-year program of instruction that is acceptable for credit toward a bachelor's degree;
- B. a tribally controlled college or university; or
- C. a nonprofit educational institution offering certificate or other skilled training programs at the postsecondary level.

40. PROFESSIONAL DEVELOPMENT –The term “professional development” means activities that —

- A. are an integral part of eligible agency, eligible recipient, institution, or school strategies for providing educators (including teachers, principals, other school leaders, administrators, specialized instructional support personnel, career guidance and academic counselors, and paraprofessionals) with the knowledge and skills necessary to enable students to succeed in career and technical education, to meet challenging State academic standards under section 1111(b)(1) of the Elementary and Secondary Education Act, or to achieve academic skills at the postsecondary level; and
- B. are sustained (not stand-alone, 1-day, or short-term workshops), intensive, collaborative, job-embedded, data-driven, and classroom-focused, to the extent practicable evidence-based, and may include activities that —
 - i. improve and increase educators’—
 - a. knowledge of the academic and technical subjects;
 - b. understanding of how students learn; and
 - c. ability to analyze student work and achievement from multiple sources, including how to adjust instructional strategies, assessments, and materials based on such analysis;
 - ii. are an integral part of eligible recipients’ improvement plans;
 - iii. allow personalized plans for each educator to address the educator’s specific needs identified in observation or other feedback;
 - iv. support the recruitment, hiring, and training of effective educators, including educators who became certified through State and local alternative routes to certification;

- v. advance educator understanding of –
- d. effective instructional strategies that are evidence-based; and
- e. strategies for improving student academic and technical achievement or substantially increasing the knowledge and teaching skills of educators;
- vi. are developed with extensive participation of educators, parents, students, and representatives of Indian Tribes (as applicable), of schools and institutions served under this Act;
- vii. are designed to give educators of students who are English learners in career and technical education programs or programs of study the knowledge and skills to provide instruction and appropriate language and academic support services to those students, including the appropriate use of curricula and assessments;
- viii. as a whole, are regularly evaluated for their impact on increased educator effectiveness and improved student academic and technical achievement, with the findings of the evaluations used to improve the quality of professional development;
- ix. are designed to give educators of individuals with disabilities in career and technical education programs or programs of study the knowledge and skills to provide instruction and academic support services to those individuals, including positive behavioral interventions and supports, multi-tier system of supports, and use of accommodations;
- x. include instruction in the use of data and assessments to inform and instruct classroom practice;
- xi. include instruction in ways that educators may work more effectively with parents and families;
- xii. provide follow-up training to educators who have participated in activities described in this paragraph that are designed to ensure that the knowledge and skills learned by the educators are implemented in the classroom;
- xiii. promote the integration of academic knowledge and skills and relevant technical knowledge and skills, including programming jointly delivered to academic and career and technical education teachers; or
- xiv. increase the ability of educators providing career and technical education instruction to stay current with industry standards.

41. PROGRAM OF STUDY – The term “program of study” means a coordinated, non-duplicative sequence of academic and technical content at the secondary and postsecondary level that –

- A. incorporates challenging State academic standards, including those adopted by a State under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965;
- B. addresses both academic and technical knowledge and skills, including employability skills;

- C. is aligned with the needs of industries in the economy of the State, region, Tribal community, or local area;
 - D. progresses in specificity (beginning with all aspects of an industry or career cluster and leading to more occupation-specific instruction);
 - E. has multiple entry and exit points that incorporate credentialing; and
 - F. culminates in the attainment of a recognized postsecondary credential.
42. **QUALIFIED INTERMEDIARY** – The term “qualified intermediary” means a nonprofit entity, which may be part of an industry or sector partnership, that demonstrates expertise in building, connecting, sustaining, and measuring partnerships with entities such as employers, schools, community-based organizations, postsecondary institutions, social service organizations, economic development organizations, Indian tribes or Tribal organizations, and workforce systems to broker services, resources, and support to youth and the organizations and systems that are designed to serve youth, including—
- A. connecting employers to classrooms;
 - B. assisting in the design and implementation of career and technical education programs and programs of study;
 - C. delivering professional development;
 - D. connecting students to internships and other work-based learning opportunities; and
 - E. developing personalized student supports.
43. **RECOGNIZED POSTSECONDARY CREDENTIAL** –The term “recognized postsecondary credential” has the meaning given the term in section 3 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3102).
44. **SECONDARY SCHOOL** – The term “secondary school” has the meaning given the term in section 8101 of the Elementary and Secondary Education Act of 1965.
45. **SECRETARY** – The term “Secretary” means the Secretary of Education.
46. **SPECIALIZED INSTRUCTIONAL SUPPORT PERSONNEL** –The term “specialized instructional support personnel” has the meaning given the term in section 8101 of the Elementary and Secondary Education Act of 1965.
47. **SPECIALIZED INSTRUCTIONAL SUPPORT SERVICES** –The term “specialized instructional support services” has the meaning given the term in section 8101 of the Elementary and Secondary Education Act of 1965.
48. **SPECIAL POPULATIONS** – The term “special populations” means --
- A. individuals with disabilities;
 - B. individuals from economically disadvantaged families, including low-income youth & adults;
 - C. individuals preparing for non-traditional fields;
 - D. single parents, including single pregnant women;

- E. out-of-workforce individuals;
 - F. English learners;
 - G. homeless individuals described in section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
 - H. youth who are in, or have aged out of, the foster care system; and
 - I. youth with a parent who –
 - i. is a member of the armed forces (as such term is defined in section 101(a)(4) of title 10, United States Code); and
 - ii. is on active duty (as such term is defined in section 101(d)(1) of such title).
49. **STATE** – The term “State”, unless otherwise specified, means each of the several States of the United States, the District of Columbia, the Commonwealth of Puerto Rico, and each outlying area.
50. **SUPPORT SERVICES** – The term “support services” means services related to curriculum modification, equipment modification, classroom modification, supportive personnel (including paraprofessionals and specialized instructional support personnel), and instructional aids and devices.
51. **TRIBALLY CONTROLLED COLLEGE OR UNIVERSITY** – The term “tribally controlled college or university” has the meaning given the term in section 2(a) of the Tribally Controlled Colleges and Universities Assistance Act of 1978 (25 U.S.C. 1801(a)).
52. **TRIBALLY CONTROLLED POSTSECONDARY CAREER AND TECHNICAL INSTITUTION** – The term “tribally controlled postsecondary career and technical institution” means an institution of higher education (as defined in section 101 of the Higher Education Act of 1965, except that subsection (a)(2) of such section shall not be applicable and the reference to Secretary in subsection (a)(5) of such section shall be deemed to refer to the Secretary of the Interior) that -
- A. is formally controlled, or has been formally sanctioned or chartered, by the governing body of an Indian Tribe or Indian Tribes;
 - B. offers a technical degree or certificate granting program;
 - C. is governed by a board of directors or trustees, a majority of whom are Indians;
 - D. demonstrates adherence to stated goals, a philosophy, or a plan of operation, that fosters individual Indian economic and self-sufficiency opportunity, including programs that are appropriate to stated Tribal goals of developing individual entrepreneurships and self-sustaining economic infrastructures on reservations or tribal lands;
 - E. has been in operation for at least 3 years;
 - F. holds accreditation with or is a candidate for accreditation by a nationally recognized accrediting authority for postsecondary career and technical education; and
 - G. enrolls the full-time equivalent of not less than 100 students, of whom a majority are Indians.

53. **TRIBAL ORGANIZATION** –The term “Tribal organization” has the meaning given the term ‘tribal organization’ in section 4 of the Indian Self-Determination and Education Assistance Act (25 U.S.C. 5304).
54. **UNIVERSAL DESIGN FOR LEARNING** –The term “universal design for learning” has the meaning given the term in section 8101 of the Elementary and Secondary Education Act of 1965.
55. **WORK-BASED LEARNING** –The term “work-based learning” means sustained interactions with industry or community professionals in real workplace settings, to the extent practicable, or simulated environments at an educational institution that foster in-depth, firsthand engagement with the tasks required of a given career field, that are aligned to curriculum and instruction.

Appendix B: WIOA Infrastructure Funding Agreement and Additional Cost Negotiations

This guidance will support cost-sharing negotiations with the local workforce development council as required under federal law, and help colleges be aware of specific constraints or opportunities for different funding sources associated with workforce programs at our colleges.

Background on WIOA

The Workforce Innovation and Opportunity Act (WIOA) replaced the previous federal workforce law in 2015. WIOA asks the workforce development system to reimagine delivery of the many different types of services offered to job-seekers and employers into an integrated, aligned, and client-centric approach. It is worth noting that much of the philosophical underpinnings of WIOA are echoed in the multiple student success and guided pathways initiatives our colleges are actively pursuing.

The community and technical college (CTC) system is a critical partner to the successful implementation of WIOA, and our colleges have been deeply engaged in planning for implementation and have begun to make the law operational in partnership with local workforce development councils and other partners.

Requirement for Local Agreements to Fund WorkSource

A long-standing requirement of the federal workforce law (previously known as "WIA") is for local areas to negotiate funding agreements among mandatory one-stop partners in support of the one-stop career centers. In Washington, those centers are known as WorkSource. Cost sharing is retained in WIOA, with the added element of requiring the governor to intercede if local areas cannot come to agreement on how to split the infrastructure costs of operating the WorkSource. Broad principles for this intervention are described in the law, but the Washington state process for the governor's intervention hasn't yet been defined.

Programs required to be physically present in a comprehensive WorkSource center must contribute to the infrastructure costs as well as costs associated with assuring career services are offered at the WorkSource. Other additional costs may also be negotiated based on local needs. In all circumstances, the cost borne by required programs must be proportionate and have relative benefit to the users of the program.

Infrastructure funding types include cash and non-cash, as well as in-kind resources by a non-one-stop partner. Non-cash contributions by WorkSource partners are expenditures incurred by the partner on behalf of the WorkSource or goods and services contributed by a partner program and used by the WorkSource center. Non-cash contributions must be fairly valued as provided in 2 CFR 200.306.

WIOA does not include caps on the amount or percentage of overall funding a WorkSource partner may contribute, except that each partner program's contributions must be consistent with the program's authorizing statute and regulations, as well as with the Uniform Guidance. No partner may contribute more than its proportionate share based on relative benefit and use by the program.

Which Programs are Required to Support WorkSource?

Washington's federally required WIOA plan (called Talent and Prosperity for All or TAP) identifies three different types of programs within Washington's workforce development system:

- Programs explicitly named as TAP partners are a required WorkSource partner. Because these programs must have a physical presence in the local comprehensive WorkSource, the law requires these programs to contribute to infrastructure costs and some additional costs (note that career services contribution is mandated).
- Programs with requirements of participation in the WorkSource system in the program's authorizing law but are not TAP partners.
- Programs which are critical to the success of the larger workforce development plan in Washington but are not required WorkSource partners (these are described in the table below).

WIOA Combined Plan (TAP) Named Partner & Required WorkSource Partner	Required WorkSource Partner (not TAP partner)	Workforce System Partner Program
<ul style="list-style-type: none"> • TANF (WorkFirst)* • Basic Education for Adults (WIOA Title II) 	Postsecondary career and technical education programs authorized under Carl D. Perkins Career and Technical Education Act, i.e., all approved professional-technical programs on college campuses	<ul style="list-style-type: none"> • Apprenticeship • Customized Training Program • Job Skills • BFET • Worker Retraining • Workforce System Partner Program

*CTCs provide TANF services under contract with DSHS

While this constellation is complex, it is clear that the CTC system is a significant partner in Washington's workforce development system, delivering the lion's share of training and education as well as serving as a key connector to local employer communities.

For Consideration While Negotiating with Your Local Area

Contributions to the local WorkSource system will need to be developed with a holistic approach, considering multiple requirements and opportunities to bring greater resources and opportunities to our students. While many of our programs are not required to pay into the WorkSource system, we do expect the colleges will be braiding funds to meet the needs of their local area in order to reduce the burden on any one program.

Any agreement for a college's financial and/or in-kind contribution to the WorkSource system in your local area should be proportionate to the use of the WorkSource system by college programs and students and should be reached collaboratively and by consensus with the other local partners. The mantra is “allowable, reasonable, necessary”.

Questions to consider as the college works with the local area to determine a proportionate and fair contribution:

- Where are the current intersections for our students and college programs/staff with the WorkSource system?
- If we were to improve the service we get from the workforce system, what would it look like and how would our investment help evolve the system towards the vision?
- What is the status of the Title II (BEEdA) negotiations for the college? Can the total college investment be made under a single agreement and incorporate Title II contributions with the contributions supporting other customers of WIOA (i.e., workforce students and programs). Important: The Title II contribution cannot be the sole contribution from the college because other college programs, such as Perkins, are required to contribute.
- If more than one college is included in a local workforce area, are all the included colleges communicating and creating a collective plan for the WorkSource contribution? If not, what are other colleges within your Workforce Development Area (WDA) doing? Are you working on an “umbrella” agreement, to include all colleges within the WDA, or doing it individually?

Options for Braiding Funding Sources to Meet WorkSource Infrastructure Requirements

While negotiating a local agreement for funding the local WorkSource, colleges could consider using non-partner program resources towards the total contribution, preventing a burden on any one required partner program. In determining the source of WorkSource infrastructure funding, please be aware of non-supplanting rules.

The following funds are either required or optional contributors to WorkSource which a college could consider for braiding together the total payment as defined in the local agreement. Constraints for each program are identified to help inform decision making.

Perkins V Requirements (required WorkSource partner)

Federal Perkins Plan funds made available for local administration of postsecondary programs and activities may be used to pay infrastructure costs. Contributions from Perkins must be from local administrative funds only. Contributions made using administrative funds may not exceed the amount available for administrative costs (currently 5% of Perkins Plan grant).

Non-Federal resources that are cash, non-cash, or third-party in-kind contributions, and other funds made available by the State to postsecondary programs may also be used to pay infrastructure costs and fulfill the Perkins contribution requirement. Colleges can consider state allocated funds such as Worker Retraining, Opportunity Grant, discretionary grant funds and general allocation as non-federal resources. Please be aware of the non-supplanting rules.

Basic Education for Adults – WIOA Title II programs (required WorkSource partner)

Any ABE Grant funds used for WorkSource infrastructure must be categorized as administrative. If funding allocated to the one-stop by a BEEdA provider goes over the set 5% administration cap, BEEdA providers can request a transfer of funds from their main grant to increase their

administration cap within the BEdA Office.

Temporary Assistance for Needy Families (required WorkSource partner)

Temporary Assistance for Needy Families (TANF), titled WorkFirst in Washington, is a required partner in TAP. The Department of Health and Human Services (DSHS) will be leading negotiations and entering into MOUs on behalf of TANF. Please note, as a service delivery provider of TANF, WorkFirst colleges must reach out to their one-stop partners to collaborate on integrated service delivery and co-enrollment efforts. WorkFirst programs must ensure access to services, including co-enrollment of WorkFirst students in other WorkSource services.

Basic Food Employment & Training (BFET)

BFET is a federally funded program and part of the TAP plan, however it is not required to make any infrastructure contributions to WorkSource. Colleges are encouraged to collaborate with partners to ensure access to BFET services and access for BFET students to other WorkSource services.

Worker Retraining

Worker Retraining is a state-funded program. Worker Retraining students are a subset of our students who most frequently access existing WorkSource resources as many are UI recipients. Colleges have found benefit to their students and their programs by co-investing with WorkSource for staff who are experts in both UI and federal workforce programs as well as the college programs funding workforce students. These co-located staff were initially underwritten by additional funds directed to the colleges many years ago. Co-location funds are still part of the annual allocation and are additional funds above and beyond the per-FTES funding in the allocation. These funds are highly flexible and could be used, along with the enrollment support portion of the WRT FTES, to contribute to the WorkSource. The financial aid portion of the WRT allocation cannot be used for WorkSource costs. WRT Financial Aid funds must only be used to directly support individual WRT students.

Activities funded by Worker Retraining, such as advising, navigating, career services, employer engagement and more might be considered as part of a non-cash contribution.

Opportunity Grant

Opportunity Grant is a state funded program supporting workforce education students. A small portion of the OG FTES is dedicated to providing wrap-around services to eligible OG students. While cash support from OG does not seem to be a good fit for contributing to the WorkSource, colleges may have existing OG-funded activities, such as student success classes, could be seen as a non-cash contribution.

Discretionary Grant Funds

Competitive state-funded grants administered by SBCTC are not permanent funding sources and should be carefully considered for contributions. These grants often have a cap on administrative costs which would need to be maintained. Non-cash contributions could be possible with existing activities, such as navigation, employer engagement or career services.

Resources

[Washington State Perkins Plan](#)

Training and Employment [Guidance Letter](#) regarding operation on One-Stops

Information on local [workforce plans](#)

[Washington's WIOA Plan/Talent and Prosperity for ALL \(TAP\)](#)

Appendix C: Required and Permissive Uses of Perkins Funds

Strengthening Career and Technical Education for the 21st Century Act (Perkins V)
SEC. 135. 20 U.S.C. 2355

LOCAL USES OF FUNDS

1. GENERAL AUTHORITY –Each eligible recipient that receives funds under this part shall use such funds to develop, coordinate, implement, or improve career and technical education programs to meet the needs identified in the comprehensive needs assessment described in section 134(c).
2. REQUIREMENTS FOR USES OF FUNDS –Funds made available to eligible recipients under this part shall be used to support career and technical education programs that are of sufficient size, scope, and quality to be effective and that –
 - A. provide career exploration and career development activities through an organized, systematic framework designed to aid students, including in the middle grades, before enrolling and while participating in a career and technical education program, in making informed plans and decisions about future education and career opportunities and programs of study, which may include –
 - i. introductory courses or activities focused on career exploration and career awareness, including non-traditional fields;
 - ii. readily available career and labor market information, including information on:
 - a. occupational supply and demand;
 - b. educational requirements;
 - c. other information on careers aligned to State, local, or Tribal (as applicable) economic priorities; and
 - d. employment sectors;
 - iii. programs and activities related to the development of student graduation and career plans;
 - iv. career guidance and academic counselors that provide information on postsecondary education and career options;
 - v. any other activity that advances knowledge of career opportunities and assists students in making informed decisions about future education and employment goals, including non-traditional fields; or
 - vi. providing students with strong experience in, and comprehensive understanding of, all aspects of an industry;
 - B. provide professional development for teachers, faculty, school leaders, administrators, specialized instructional support personnel, career guidance and academic counselors, or paraprofessionals, which may include –

- i. professional development on supporting individualized academic and career and technical education instructional approaches, including the integration of academic and career and technical education standards and curricula;
 - ii. professional development on ensuring labor market information is used to inform the programs, guidance, and advisement offered to students, including information provided under section 15(e)(2)(C) of the Wagner-Peyser Act (29 U.S.C. 491–2(e)(2)(C));
 - iii. providing teachers, faculty, school leaders, administrators, specialized instructional support personnel, career guidance and academic counselors, or paraprofessionals, as appropriate, with opportunities to advance knowledge, skills, and understanding of all aspects of an industry, including the latest workplace equipment, technologies, standards, and credentials;
 - iv. supporting school leaders and administrators in managing career and technical education programs in the schools, institutions, or local educational agencies of such school leaders or administrators;
 - v. supporting the implementation of strategies to improve student achievement and close gaps in student participation and performance in career and technical education programs;
 - vi. providing teachers, faculty, specialized instructional support personnel, career guidance and academic counselors, principals, school leaders, or paraprofessionals, as appropriate, with opportunities to advance knowledge, skills, and understanding in pedagogical practices, including, to the extent the eligible recipient determines that such evidence is reasonably available, evidence-based pedagogical practices;
 - vii. training teachers, faculty, school leaders, administrators, specialized instructional support personnel, career guidance and academic counselors, or paraprofessionals, as appropriate, to provide appropriate accommodations for individuals with disabilities, and students with disabilities who are provided accommodations under the Rehabilitation Act of 1973 (29 U.S.C. 701 et seq.) or the Individuals with Disabilities Education Act;
 - viii. training teachers, faculty, specialized instructional support personnel, career guidance and academic counselors, and paraprofessionals in frameworks to effectively teach students, including a particular focus on students with disabilities and English learners, which may include universal design for learning, multi-tier systems of supports, and positive behavioral interventions and support; or
 - ix. training for the effective use of community spaces that provide access to tools, technology, and knowledge for learners and entrepreneurs, such as makerspaces or libraries;
- C. provide within career and technical education the skills necessary to pursue careers in high-skill, high-wage, or in-demand industry sectors or occupations;
- D. support integration of academic skills into career and technical education programs and programs of study to support –

- i. CTE participants at the secondary school level in meeting the challenging State academic standards adopted under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965 by the State in which the eligible recipient is located; and
 - ii. CTE participants at the postsecondary level in achieving academic skills;
- E. plan and carry out elements that support the implementation of career and technical education programs and programs of study and that result in increasing student achievement of the local levels of performance established under section 113, which may include—
 - i. a curriculum aligned with the requirements for a program of study;
 - ii. sustainable relationships among education, business and industry, and other community stakeholders, including industry or sector partnerships in the local area, where applicable, that are designed to facilitate the process of continuously updating and aligning programs of study with skills that are in demand in the State, regional, or local economy, and in collaboration with business outreach staff in one-stop centers, as defined in section 3 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3102), and other appropriate organizations, including community-based and youth-serving organizations;
 - iii. where appropriate, expanding opportunities for CTE concentrators to participate in accelerated learning programs (as described in section 4104(b)(3)(A)(i)(IV) of the Elementary and Secondary Education Act of 1965 (20 U.S.C. 7114(b)(3)(A)(i)(IV)), including dual or concurrent enrollment programs, early college high schools, and the development or implementation of articulation agreements as part of a career and technical education program of study;
 - iv. appropriate equipment, technology, and instructional materials (including support for library resources) aligned with business and industry needs, including machinery, testing equipment, tools, implements, hardware and software, and other new and emerging instructional materials;
 - v. a continuum of work-based learning opportunities, including simulated work environments;
 - vi. industry-recognized certification examinations or other assessments leading toward a recognized postsecondary credential;
 - vii. efforts to recruit and retain career and technical education program teachers, faculty, school leaders, administrators, specialized instructional support personnel, career guidance and academic counselors, and paraprofessionals;
 - viii. where applicable, coordination with other education and workforce development programs and initiatives, including career pathways and sector partnerships developed under the Workforce Innovation and Opportunity Act (29 U.S.C. 3101 et seq.) and other Federal laws and initiatives that provide students with transition-related services, including the Individuals with Disabilities Education Act;
 - ix. expanding opportunities for students to participate in distance career and technical education and blended- learning programs;

- x. expanding opportunities for students to participate in competency-based education programs;
 - xi. improving career guidance and academic counseling programs that assist students in making informed academic and career and technical education decisions, including academic and financial aid counseling;
 - xii. supporting the integration of employability skills into career and technical education programs and programs of study, including through family and consumer science programs;
 - xiii. supporting programs and activities that increase access, student engagement, and success in science, technology, engineering, and mathematics fields (including computer science and architecture) for students who are members of groups underrepresented in such subject fields;
 - xiv. providing career and technical education, in a school or other educational setting, for adults or out-of-school youth to complete secondary school education or upgrade technical skills;
 - xv. supporting career and technical student organizations, including student preparation for and participation in technical skills competitions aligned with career and technical education program standards and curricula;
 - xvi. making all forms of instructional content widely available, which may include use of open educational resources;
 - xvii. supporting the integration of arts and design skills, when appropriate, into career and technical education programs and programs of study;
 - xviii. partnering with a qualified intermediary to improve training, the development of public-private partnerships, systems development, capacity-building, and scalability of the delivery of high-quality career and technical education;
 - xix. support to reduce or eliminate out-of-pocket expenses for special populations participating in career and technical education, including those participating in dual or concurrent enrollment programs or early college high school programs, and supporting the costs associated with fees, transportation, child care, or mobility challenges for those special populations; or
 - xx. other activities to improve career and technical education programs; and
- F. develop and implement evaluations of the activities carried out with funds under this part, including evaluations necessary to complete the comprehensive needs assessment required under section 134(c) and the local report required under section 113(b)(4)(B).
3. **POOLING FUNDS** —An eligible recipient may pool a portion of funds received under this Act with a portion of funds received under this Act available to one or more eligible recipients to support implementation of programs of study through the activities described in subsection (b)(2).
4. **ADMINISTRATIVE COSTS** —Each eligible recipient receiving funds under this part shall not use more than 5 percent of such funds for costs associated with the administration of activities under this section.

Appendix D: Guidelines for Utilizing Perkins Grant Funding for Direct Assistance to Students

Eligibility

Section 135(b)(5)(S) of Perkins V and guidance provided in Office of Career, Technical, and Adult Education's (OCTAE) 2016 Q&A permits the use of grant funding to support students in need of additional financial assistance. As the grant is intended to supplement, not supplant, existing programs and resources, the use of Perkins funds for this purpose is contingent upon the depletion of all other sources of financial aid available to a student. Hence, an institution providing direct assistance to students must demonstrate that it has investigated and exhausted all financial aid options before disbursing Perkins funds in this manner.

In addition, the following conditions must be met and documented to determine a student's eligibility for Perkins direct assistance:

1. The student must be enrolled at least half-time in a professional-technical program;
2. The student must be a member of a special population* as defined in Perkins V;
3. The student must complete the FAFSA;
4. The student must be eligible for the federal Pell Grant;
5. The student must maintain a 2.0 cumulative GPA;
6. The student must complete an application for assistance on an annual basis.

Perkins direct assistance may not exceed a student's financial need and is intended to be used only for tuition and fees to the extent that it addresses barriers to a student's participation in professional/technical programs. To that end, Perkins funds must be paid directly to the college, and not disbursed to students directly. It is also expected that direct assistance to students be part of a broader system-wide effort to support members of special populations.

Special populations, as defined by Perkins V, are:

- individuals with disabilities;
- individuals from economically disadvantaged families, including low-income youth and adults;
- individuals preparing for non-traditional fields;
- single parents, including single pregnant women;
- out-of-workforce individuals;
- English learners;
- homeless individuals described in section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);

- youth who are in, or have aged out of, the foster care system; and
- youth with a parent who –
 - is a member of the armed forces (as such term is defined in section 101(a)(4) of title 10, United States Code); and
 - is on active duty (as such term is defined in section 101(d)(1) of such title.

To ensure an equitable distribution of funds, if the college intends to provide direct assistance to students, the application process must be broadly marketed and made available to all eligible students. Criteria for awarding Perkins funding should be clearly communicated and distribution prioritized by highest need.

Appendix E: Conferences, Meetings and Food

The following memorandum was sent to direct grant recipients of the United States Department of Education in 2014 and is still applicable today. Use it as a guide when considering whether to use grant funds to pay for conferences and meetings, including working meals. If you have questions, contact SBCTC for assistance.

UNITED STATES DEPARTMENT OF EDUCATION

Office of the Chief Financial Officer

**MEMORANDUM to ED GRANTEEES REGARDING THE USE OF GRANT FUNDS
FOR CONFERENCES AND MEETINGS**

You are receiving this memorandum to remind you that grantees must take into account the following factors when considering the use of grant funds for conferences and meetings:

- Before deciding to use grant funds to attend or host a meeting or conference, a grantee should:
 - Ensure that attending or hosting a conference or meeting is consistent with its approved application and is reasonable and necessary to achieve the goals and objectives of the grant;
 - Ensure that the primary purpose of the meeting or conference is to disseminate technical information, (e.g., provide information on specific programmatic requirements, best practices in a particular field, or theoretical, empirical, or methodological advances made in a particular field; conduct training or professional development; plan/coordinate the work being done under the grant); and
 - Consider whether there are more effective or efficient alternatives that can accomplish the desired results at a lower cost, for example, using webinars or video conferencing.
- Grantees must follow all applicable statutory and regulatory requirements in determining whether costs are reasonable and necessary, especially the Cost Principles for Federal grants set out at 2 CFR Part 200 Subpart E of the, “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.” In particular, remember that:
 - Federal grant funds cannot be used to pay for alcoholic beverages; and
 - Federal grant funds cannot be used to pay for entertainment, which includes costs for amusement, diversion, and social activities.
- Grant funds may be used to pay for the costs of attending a conference. Specifically, Federal grant funds may be used to pay for conference fees and travel expenses (transportation, per diem, and lodging) of grantee employees, consultants, or experts to attend a conference or meeting if those expenses are reasonable and necessary to achieve the purposes of the grant.
 - When planning to use grant funds for attending a meeting or conference, grantees should consider how many people should attend the meeting or conference on their behalf. The number of attendees should be reasonable and necessary to accomplish the goals and objectives of the grant.
- A grantee hosting a meeting or conference may not use grant funds to pay for food for conference attendees unless doing so is necessary to accomplish legitimate meeting or

conference business.

- A working lunch is an example of a cost for food that might be allowable under a Federal grant if attendance at the lunch is needed to ensure the full participation by conference attendees in essential discussions and speeches concerning the purpose of the conference and to achieve the goals and objectives of the project.
- A meeting or conference hosted by a grantee and charged to a Department grant must not be promoted as a U.S. Department of Education conference. This means that the seal of the U.S. Department of Education must not be used on conference materials or signage without Department approval.
- All meeting or conference materials paid for with grant funds must include appropriate disclaimers, such as the following:
 - The contents of this (insert type of publication; e.g., book, report, film) were developed under a grant from the Department of Education. However, those contents do not necessarily represent the policy of the Department of Education, and you should not assume endorsement by the Federal Government.
- Grantees are strongly encouraged to contact their project officer with any questions or concerns about whether using grant funds for a meeting or conference is allowable prior to committing grant funds for such purposes.
 - A short conversation could help avoid a costly and embarrassing mistake.
- Grantees are responsible for the proper use of their grant awards and may have to repay funds to the Department if they violate the rules on the use of grant funds, including the rules for meeting- and conference-related expenses.

12/2014

SBCTC Guidance - Meal Eligibility Requirements

After reading the above memorandum for guidance, the following need to be met for a meal to be eligible to be funded by Perkins:

- 1. Meals can only be provided to elective/appointive officials and state employees**
 - a. Advisory committee members are appointed officials
 - b. Students, guests, and community members are not eligible
 - 2. Conduct official state business or to provide training to state employees/officials**
 - a. An agenda will clearly show that the meal is an integral part of the meeting/training and official business is conducted during meal time
 - b. An agenda would be required for state employees or meeting minutes would be required for elected or appointed officials
- Note:** Hosting, networking, and social activities are **not** considered official business or training
- 3. Meals are an integral (official business is being conducted during mealtime) part of the business meeting or training session**
 - 4. Meeting or training takes place away from the employee's or official's regular workplace**
 - 5. The agency obtains an itemized receipt for the actual costs of the meals with meetings**
 - a. Meals can only be up to per diem for each attendee
 - 6. Documentation of advance for approval for meals (internal procedure at the college)**

Appendix F: How to Calculate FTE & FTEF

Why Are Accurate FTE and FTEF Calculations Necessary?

Grant expenses must be “necessary and reasonable.” You must provide some type of salary breakdown for us to determine that the budgeted cost is reasonable. The budget narrative amounts must agree with the salary/wages, and benefits budgets.

What is FTE and FTEF?

FTE is full-time equivalent staff. The plural is “FTEs” (with a lower case “s”).

FTEF is full-time equivalent faculty.

How Do I Calculate Percentages of FTE and FTEF?

Total amount of funds budgeted for the staff/faculty time per position ÷ the annual full-time salary per position = total FTE per position to be funded from the grant.

Percentage of position salary allocated to the grant x the annual salary of each position = the salary budget for each position.

Example of Calculating FTE and/or FTEF:

Ex. 1) \$10,000 budgeted for a part-time office assistant/adjunct faculty ÷ \$50,000 annual full-time salary for this position at your organization = a total of 0.20 FTE office assistant/adjunct faculty paid from this grant.

$$\$10,000 \div \$50,000 = .20 \text{ FTE}$$

Ex. 2) The grant staff/faculty salary allocation of 75% FTE is budgeted for this year. The annual salary for this position is \$60,000. The salary cost for the budget comes to \$45,000 by multiplying the estimated FTE by the annual salary for this staff/faculty position.

$$\$60,000 \times 75\% \text{ FTE} = \$45,000$$

Ex. 3) Salary allocation for a grant administrator is \$80,000. The annual salary for this position is \$160,000. Annual FTE for this position equals \$80,000 divided by \$160,000 = 50% FTE. Double check by multiplying the calculated FTE by the annual salary for this administrative position.

$$\$80,000 \div \$160,000 = .50 \text{ FTE}$$

More Examples & Explanations

Acceptable Budget Narrative:

Salary Budget: \$1,500 **Benefits Budget:** \$300

Narrative Description: PT Program Assistant: 30FTE = \$15,000 salary and \$3,000 benefits. Provides CTE administrative support.

The above seems reasonable for a part-time office assistant providing CTE administrative support.

Unacceptable Budget Narrative:

Salary Budget: \$1,000 **Benefits Budget:** \$200

Narrative Description: Part-time tutor to provide CTE student instructional support.

The above narrative omits the FTE, salary, or hourly wage information, and benefit amount for this position. The total for the salaries/wages, and benefits for categories showing more than one position must agree with the budgets. The narrative for each position needs to include the specific FTE, salary or hourly wage information, and benefit amount so the SBCTC can confirm that the budgets agree with the listed narrative amounts.

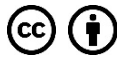
Budget Narrative Using Hourly Wage Information:

While we prefer FTE/FTEF amounts, it is also acceptable to provide an approximate number of hours and an approximate hourly pay rate in budget narratives.

Salary/Wages Budget: \$1,200 **Benefits Budget:** \$250

Narrative Description: PT CTE Instructional Tutor: \$1,200 Wages for approx. 60 hrs. at \$20/hr., and Benefits \$250. Provides CTE student instructional support.

SBCTC can determine that the dollar amount is reasonable and accurate.



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Washington State Board for Community and Technical Colleges