



PERKINS LEADERSHIP BLOCK GRANT

2025-26 GRANT GUIDELINES

Workforce Education Development
Washington State Board for Community and Technical Colleges
PO Box 42495
Olympia, WA 98504
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	March 20, 2025
Applications due in OGMS	April 24, 2025
Billing deadline for all expenses incurred through September 30, 2025	October 31, 2025
Billing deadline for all expenses incurred through December 31, 2025	January 31, 2026
Billing deadline for all expenses incurred through March 31, 2026	April 30, 2026
Final budget revision deadline	June 15, 2026
Projected end date of grant	June 30, 2026
Final reports due	June 30, 2025
Billing deadline for all expenses incurred through June 30, 2026	July 15, 2026

Grant Contacts

Program Administration Questions

Kimberly Ingram
Program Administrator, Workforce Education
kingram@sbctc.edu
360-704-3988

Policy Oversight Questions

William Belden
Policy Associate, Workforce Education
wbelden@sbctc.edu
360-704-4359

Fiscal Administration Questions

Melanie Kielich
Fiscal Grant Administrator
mkielich@sbctc.edu
360-704-3971

OGMS, OBIS, & Invoicing Questions

Kari Kauffman
Program Coordinator
kkauffman@sbctc.edu
360-704-1021

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Overview

The Perkins Leadership Block Grant is designed to allow for local flexibility and autonomy while aligning with and incorporating the Leadership priorities articulated in the Washington State Perkins Plan. These are reflected in the five narrative sections described below, two of which (Professional Development and Local Student Leadership) carried over from Perkins IV with minor revisions. What were formerly classified in general terms as Replication and Innovation Projects should now fit within the categories of Program Adaptation and Development, Special Populations (which may include non-traditional initiatives), and Statewide and Regional Partnerships. While colleges are still encouraged to share and adopt promising practices across the system, all projects supported with Leadership funds should be adapted to fit the college proposing them and described accordingly within the application.

Applicant Guidelines

Who May Apply

This grant is open to community and technical colleges in Washington State as defined under [RCW 28B.50.030](#).

How Does the Provider Apply

Access the 2025-26 Perkins Leadership Block Grant Application through the Online Grant Management System ([OGMS](#)).

If you do not have an account, contact your organization's [Security Contact](#) for access to the FY26 Perkins Leadership Block Grant.

Submit completed grant applications to the SBCTC through OGMS no later than April 24, 2025 at 11:55 p.m. SBCTC staff is available for assistance until 4:00 p.m. on April 24, 2025. ***Grant funds will not pay for costs incurred prior to the grant approval date and/or before July 1, 2025.***

Application Process

We suggest writing responses to application questions in a word processing program and pasting the application content into OGMS. This will help ensure you do not lose any content if the OGMS application times out.

The Assurances document that your college signed and uploaded to your 2025-26 Perkins Plan grant application applies to this grant as well.

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.

Changing Grant Activities after Grant Award Date

If the college changes the scope of work after the application has been approved, submit an

addendum in OGMS. The OGMS user manual, which you can find in the How To section of OGMS has instructions on how to create and submit addenda. Please contact the Perkins Program Administrator before submitting an addendum.

Note: Do not upload an attachment to request changes to this grant application.

Accountability

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.

Reporting

The link to complete and submit the 2025-26 Perkins Leadership Block Grant Year-End Report will be posted on the SBCTC website and emailed. A final report must be submitted to the SBCTC no later than June 30, 2026. The annual report will be submitted online through a digital platform (Google Forms, SurveyMonkey, etc.) and not submitted through OGMS.

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.

Funding

Funding

The availability of funds depends on federal budgets and Workforce Training and Education Coordinating Board (WTECB) policy.

Ten percent of the total state award is allocated for Leadership funds and is shared between the Workforce Board, the secondary education system, and the postsecondary system. Funds are set aside for serving individuals in state institutions, preparing individuals for non-traditional fields, and recruitment of special populations to career and technical education. The remaining amount is split between WTECB, OSPI, and SBCTC and are prioritized to award Leadership Block Grant applications at SBCTC.

Perkins Leadership Block Grant funds must be expended by June 30, 2026. Grant funds will not

pay for costs incurred prior to the grant approval date.

Funding for 2025-26

Each college eligible for Perkins Leadership funding will receive \$30,000 in this block grant. Colleges determine the amount of money to spend in each grant category.

Funds are available July 1, 2025, and must be expended by June 30, 2026. ***Grant funds will not pay for costs incurred prior to the grant approval date and/or before July 1, 2025.***

Grant Activities

There are five grant categories for Leadership Block funding: Program Adaptation and Development, Special Populations, Industry-Based and SBCTC-Approved Professional Development, Local Student Leadership, and Statewide and Regional Partnership.

Program Adaptation and Development

This funding supports efforts to develop new programs, modernize existing ones, revise curriculum, explore alternative methods of instruction, and establish relationships with partners that will inform these initiatives and/or provide students with higher quality career and technical education and opportunities to gain a comprehensive understanding of all aspects of industry. Such projects should be responsive to business/industry needs and aligned with themes identified in the college's Comprehensive Local Needs Assessment (CLNA). Examples provided in the Perkins V State Plan include:

- Prioritizing program investment aimed at closing an opportunity or access gap;
- Adapting programs to increase access to remote students, including adopting hybridized learning models;
- Adapting program offerings to meet employment trends in light of advancement in technology, automation, and artificial intelligence;
- Investing in improved labor market tools that will support predicting new and existing employment opportunities and future trends;
- Establishing regional and statewide articulation agreements aligned with programs of study;
- Supporting the adoption and integration of recognized postsecondary credentials and work-based learning into programs of study.

Special Populations

Special Populations projects should be aimed at reducing barriers, guaranteeing equal access, and ensuring equitable outcomes for students who are members of special populations, including those who are underrepresented in non-traditional career fields. These projects may be broad in scope or designed to address specific enrollment and/or achievement gaps identified through CLNA process. Per the Perkins V State Plan, Leadership investments may include, but are not limited to, "partnerships with tribes/tribal organizations and business and industry leaders; supporting participation for non-traditional employment; lowering barriers identified by school districts and colleges in rural communities; and activities that eliminate inequities in access to high-quality programs."

Special populations, as defined in Perkins V, include:

- 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 and is on active duty.

Industry-Based Professional Development

Faculty, career guidance counselors, academic counselors, and administrators involved in integrated CTE programs may be provided with professional development under Perkins V, provided it meets the standard established by the legislation. While the law provides an extensive list of permissible examples, in short, the Strengthening Career and Technical Education for the 21st Century Act defines 'professional development' as activities that --

1. 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
2. are sustained, intensive, collaborative, job-embedded, data-driven, and classroom-focused.

SBCTC cannot fund stand-alone, 1-day, or short-term workshops that are not aligned with a comprehensive professional development plan.

Industry-based professional development (IBPD) includes return-to-industry work experience or industry-sponsored training directly related to the program being taught or supervised. These funds provide opportunities to stay current in the career field and must meet the criteria established by the Strengthening Career and Technical Education for the 21st Century Act. Professional development activities may qualify as "sustained" or "intensive" as a component of faculty certification or an approved professional development plan; however, colleges must be mindful of the distinction and deliberate in their approach to professional development planning and application. Accordingly, colleges cannot use funds for training on broad topics, general administrative or instructional practices, "soft skills", and subject matter unrelated to CTE programs with the noteworthy exception of training aimed at improving outcomes for members of special populations in CTE programs.

SBCTC will provide guidance for colleges when requests do not fit clearly within the requirements for allowed professional development. Colleges are encouraged to consult with SBCTC staff.

Who is eligible to use Industry-Based Professional Development funding?

- CTE instructors
- CTE administrators
- Teams of CTE and Basic Education for Adults (BEEdA) instructors/administrators attending industry training
- CTE staff

What is Industry-based professional development?

- Temporary working positions in the field (either paid or volunteer) to improve knowledge of current practices.
- Attendance at recognized hands-on industry sponsored training program resulting in industry certification or an industry upgrade.
- Teams of Adult Basic Education faculty or administrators jointly attending industry specific professional development with CTE faculty or administrators with the intent to deliver contextualized integrated instruction.

Local Student Leadership

Career and Technical Student Organizations (CTSOs) must be skills-oriented, provide leadership development, and participate in a recognized career leadership organization.

Funds support 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 (section 135(5)(O)).

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.

Do NOT use grant funds to:

- Purchase supplies, jackets, or other effects for students' personal ownership.
- Pay for non-instructional activities such as athletic, social, or recreational events.
- Print and disseminate non-instructional newsletters.
- Purchase awards for recognition of students, advisors, or other individuals.

Statewide and Regional Partnership Funding

Colleges may utilize Leadership funding to initiate or support statewide and/or regional partnerships with employers, secondary or postsecondary educational institutions, community-based organizations, workforce development councils, and other agencies integral to the development, evaluation, or improvement of career and technical education programs. Examples provided in the Perkins V State Plan include:

- Incentivizing a regional and/or statewide approach to planning and activities related to expanding CTE dual credit access;
- Review and development of CLNAs;
- Developing statewide programs of study aligned with high-skill, high-wage, in-demand, and emerging occupations.
- Increasing community work-based learning opportunities for both secondary and postsecondary students; and
- Facilitating career pathway development.

Budget & Invoicing Guidance

Budget Activities

The following list identifies eligible Perkins Leadership Block Grant components by activity (also known as a budget line or line item). See “Grant Activities” starting on page 7 for more detail on each activity.

Program Adaptation and Development

Funding supports efforts to develop new programs, modernize existing ones, revise curriculum, and/or explore alternative methods of instruction.

Special Populations

Funding supports projects aimed at reducing barriers, guaranteeing equal access, and ensuring equitable outcomes for students who are members of special populations.

Industry-Based Professional Development

Funding supports intensive, industry-based professional development. Industry-based professional development (IBPD) includes return-to-industry work experience or industry-sponsored training directly related to the program being taught or supervised. These funds provide opportunities to stay current in the career field.

Local Student Leadership

Funding supports faculty advisors for local career and technical student organizations. Advisors coordinate the CTSO's activities and prepare students for regional, state, and national skills competitions. Funding generally covers the costs of an advisor, advisor travel, and materials for competition.

Statewide and Regional Partnership

Funding supports regional or statewide collaboration with employers, educational institutions, community-based organizations, workforce development councils, and other agencies integral to the development, evaluation, or improvement of career and technical education programs.

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 B](#) 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 \$10,000 or a useful life of less than one year or services necessary to carry out Perkins activities.

Examples: gloves, masks, and helmets in various sizes to better accommodate women in manufacturing

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.

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.

Example: 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:

3. Related to a student organization that is an integral part of the curriculum

OR

4. 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: Consultant to coordinate college CLNA activities, trainer to provide CTE faculty/staff workshops on implicit bias and inclusive pedagogy

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.

Reserve Funds

If you do not know how all \$30,000 of your grant will be spent at the time you apply for the grant, you can budget funds on the Reserve line. However, you must identify how you intend to utilize at least 70% of your award at the time of application. Understanding that plans and priorities do change, you may re-allocate Reserve funds and those you have budgeted elsewhere by submitting a budget revision request in OBIS and, if applicable, an application addendum in OGMS prior to spending the funds. You cannot spend or invoice for funds budgeted to the Reserve line.

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, 2026.

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, 2025
October – December	January 31, 2026
January – March	April 30, 2026
April – June	July 15, 2026

All financial reports, including reimbursement requests, must be certified upon submission. Please read the certification statement within the OBIS invoice module and click on the check box to attest to the statement

Invoices may be pulled for pre-payment review by SBCTC financial staff. If this is done, the invoice will be placed in “Audit” status in OBIS and the recipient institution will receive an automated email detailing the next steps. It is important to provide all requested back-up documentation as soon as possible, as OBIS will not allow additional budget revisions or invoices for the same award to be submitted while an invoice is in “Audit” status.

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/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 200.400-476).

The following state and federal regulations must be followed:

Applicable Washington State Regulations

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

Applicable Federal Regulations

Education Department General Administrative Regulations (EDGAR [34 CFR 75](#))

[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)

[General Education Provisions Act](#) (GEPA)

Office for Civil Rights (OCR) [Statutes and Regulations](#)

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 \$10,000 or more and a useful life in excess of one year must be under inventory control.

Purchased Items – Disposal of Items

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 \$10,000, 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 [Denise Costello](#) for assistance.

Unallowable Costs

The following costs are explicitly disallowed:

- Administrative costs
- 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
- General consumables not related to specific career and technical education (CTE) programs. This includes items or services, used for administrative purposes, that 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 CTE classrooms, laboratories, or college facilities (34 CFR 75.533)
- 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 A](#)) (2 CFR 200.405(a)(3))
- Bad debt expenses (2 CFR 200.426)
- 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. (2 CFR 200.450)

- Legislative expenses such as lobbying
- Sectarian worship, instruction, or proselytization (34 CFR 75.532)
- 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 (2 CFR 200.421(e))
- 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)
- 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, that 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 **FY26** - do **NOT** enter the CFDA/Assistance Listing Number in ctcLink for grants from SBCTC
- **Project Type:** 02012
- **Fund:** 145
- **Class:** See [NACUBO Code Section, below, for suggestions](#)
- **Revenue Account:** 4020120
- **Contract Asset Account:** 1010180

When entering this grant into ctcLink, be sure to select budget items based on the types of expenses the college will have. To view ctcLink budget items/accounts and expense accounts that roll up to each budget item/account, visit the ctcLink [Project Tree](#) QRG.

To add a new activity to an existing grant in ctcLink follow the [Adding an Activity to an Active Grant](#) QRG. Use this QRG to add new funding to the grant for a new activity or to add funds in an existing activity not previously entered in ctcLink

NACUBO Code

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

- **Special Populations budget line:** 144, 145, 161, or 163
- **Program Adaptation and Development budget line:** 144, 145, or 161
- **Industry-based Professional Development budget line:** 144
- **Student Leadership budget line:** 162
- **Partnerships budget line:** 143 or 145

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 from Perkins, be accounted for as program income (see Program Income section below). 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)).

Mandatory Disclosures

Grant recipients must promptly disclose whenever, in connection with the Federal award, it has credible evidence of the commission of a violation of Federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations or a violation of the civil False Claims Act. The disclosure must be made in writing to SBCTC, the Federal agency, and the agency's Office of Inspector General. Recipients are also required to report matters related to recipient integrity and performance in accordance with 2 CFR 200 Appendix XII.

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, disability, 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)).

Participant Support

Recipients must set their own policy for the request and use of student support funds in line with their approved budget. The classification of items as participant support costs must be documented in the recipient's written policies and procedures and treated consistently across all Federal awards per 2 CFR 200.456.

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.

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.

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 grant, 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 to a federal grant to keep time and/or effort reports to substantiate the charges. Additional time & effort reporting information may be found [online](#) and in OBIS under the resource tab.

Whistleblower Protections

An employee of a recipient or subrecipient must not be discharged, demoted, or otherwise discriminated against as a reprisal for disclosing information that the employee reasonably believes is evidence of gross mismanagement of a Federal contract or grant, a gross waste of Federal funds, an abuse of authority relating to a Federal contract or grant, a substantial and specific danger to public health or safety, or a violation of law, rule, or regulation related to a Federal contract or grant. The recipient and subrecipient must inform their employees in writing of employee whistleblower rights and protections under 41 U.S.C. 4712.

Appendix A: 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:

- Meals can only be provided to elective/appointive officials and state employees.
- Advisory committee members are appointed officials.
- Students, guests, and community members are not eligible.
- Conduct official state business or to provide training to state employees/officials.
- An agenda will clearly show that the meal is an integral part of the meeting/training and official business is conducted during meal time.
- 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.

- Meals are an integral (official business is being conducted during mealtime) part of the business meeting or training session.
- Meeting or training takes place away from the employee's or official's regular workplace.
- The agency obtains an itemized receipt for the actual costs of the meals with meetings.
- Meals can only be up to per diem for each attendee.
- Documentation of advance for approval for meals (internal procedure at the college).

Appendix B: 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.

Appendix C: 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.



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Washington State Board for Community and Technical Colleges