



# **BASIC FOOD EMPLOYMENT AND TRAINING (BFET)**

## ***2024-25 PROGRAM & FISCAL GUIDELINES***

Workforce Education Department  
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

Milestone	Dates (subject to change)
Applications available	June 13, 2024
Applications due in OGMS	July 25, 2024
Applicants notified of approval status	Mid-September 2024
Program begins	October 1, 2024
Final budget revision deadline	September 15, 2025
Program ends	September 30, 2025
Final billing deadline	October 31, 2025

## Program & Fiscal Contacts

### Program Administration Questions

Sheila Acosta  
Program Administrator, Student Support Programs  
[sacosta@sbctc.edu](mailto:sacosta@sbctc.edu)  
360-704-3925

### Policy Questions

Jennifer Dellinger  
Policy Associate, Student Support Programs  
[jdellinger@sbctc.edu](mailto:jdellinger@sbctc.edu)  
360-704-4339

### eJAS and Canvas Technical Assistance

Dylan Jilek  
Integrations Coordinator, Student Support Programs  
[StudentSupport@sbctc.edu](mailto:StudentSupport@sbctc.edu)  
[360-704-4327](tel:360-704-4327)

### Compliance & Monitoring

Rebecca Kay  
Relationship & Compliance Analyst, Student Support Programs  
[rkay@sbctc.edu](mailto:rkay@sbctc.edu)  
360.704.4341

### Fiscal Policy and Invoicing Questions

Denise Costello  
Associate Director, Fiscal Management  
[dcostello@sbctc.edu](mailto:dcostello@sbctc.edu)  
360-704-4344

### Budget, Invoicing, & OBIS Questions

Melanie Kielich  
Fiscal Grant Administrator  
[mkielich@sbctc.edu](mailto:mkielich@sbctc.edu)  
360-704-3971

### OGMS, OBIS, & Invoicing Questions

Kari Kauffman  
Program Coordinator  
[kkauffman@sbctc.edu](mailto:kkauffman@sbctc.edu)  
360-704-1021

# Table of Contents

Deadlines and Milestones.....	2
Program & Fiscal Contacts.....	2
Table of Contents.....	3
Overview .....	5
History .....	5
SBCTC BFET Program .....	5
Applicant Information .....	5
Who May Apply.....	5
How Does the Provider Apply? .....	5
Application Process .....	6
Disclaimer .....	6
Budget & Narrative Guidance .....	8
Budget Activities .....	8
Budget Categories .....	9
Participant Reimbursement Categories .....	11
Budget Revisions .....	15
Invoicing .....	15
Billing Cycle .....	16
Eligible Expenditures .....	16
Examples of eligible expenditures: .....	16
Funding Options.....	17
Terms & Information.....	18
General.....	18
Allowable Costs.....	18
Contract Management & Fiscal Accountability .....	19
Debarment and Suspension .....	19
Expenditure Accounting.....	19
Mandatory Disclosures.....	20
Non-Discrimination .....	20
Program Income .....	21
Public Announcements, Disclosure of Federal Funding.....	21
Records Retention .....	21
Rights in Materials.....	21
Termination .....	21
Savings .....	21
Whistleblower Protections.....	22
Enrollment with Multiple BFET Providers .....	22

BFET Program Compliance.....	22
Compliance with Applicable Laws.....	22
BFET Provider’s Handbook.....	22
BFET Policy and Procedure Manual.....	22
Outreach and Recruitment.....	23
Time and Effort .....	23
Mandatory Training.....	23
Mandatory Reporting.....	24
Maintenance of Records .....	24
Maintaining Confidentiality .....	24
Notification of Compromise or Potential Compromise .....	24
Notice of Non-disclosure .....	24
Securing Confidential Information .....	24
Data Security.....	25
Civil Rights & Non-Discrimination Statements.....	25
Participant Records, Forms, and Reporting .....	25
Activities, Components, and Hours of Participation .....	33
BFET Referral & BFET Provider Determination .....	35
Life Skills/Strategy for Success Training (SL) .....	36
Work Based Learning .....	36
College Fiscal and Program Monitoring.....	42
Appendix A: Minimum Requirements on a Participant Reimbursement Form .....	45
Appendix B: Academic Plan Sample .....	46
Appendix C: How to Calculate FTE & FTEF .....	47
Why Are Accurate FTE and FTEF Calculations Necessary? .....	47
What are FTE and FTEF? .....	47
More Examples & Explanations .....	47
Appendix D: Data Security Requirements .....	49
BFET Contract – Attachment A: requirements for SBCTC Subcontractors and Sub grantees .....	49
Appendix E: Table of Contents Guide for BFET Policy and Procedure Manual .....	57
Administration.....	57
Student Services.....	59
Appendix F: Portable Digital Device Loaner Program .....	61

# Overview

Offered through the Department of Agriculture's Food and Nutrition Service (FNS), the Basic Food Employment and Training (BFET) program is a means by which the State Board for Community and Technical Colleges (SBCTC) facilitates access to federal workforce education and training dollars to enable basic food recipients to gain the skills necessary for employment. The target population is basic food recipients, not currently on TANF.

## History

In October 2005, DSHS launched a pilot program in King County to substantially increase the amount of federal BFET dollars available to support employment and training services for low-income adults. Fifty percent of any allowable expenses incurred by a third-party contractor will be reimbursed by FNS. The pilot expanded in each year thereafter to include college providers across the state. The pilot was unique, representing the first third-party reimbursement program in the nation.

In 2009-10, the SBCTC negotiated an umbrella contract with DSHS, covering all of our participating Community and Technical Colleges (CTCs). In 2011-12 DSHS, in partnership with the SBCTC, convened a strategic planning committee to produce a five-year plan to grow the BFET program statewide. Since 2013-14, all 34 CTCs offer the program, along with more than 30 Community Based Organizations.

In 2019, the WA State Legislature passed HB1893 that required DSHS and the SBCTC to review and if possible, under federal law, expand allowable programs to increase access to education for SNAP recipients. In 2020, all programs (except AA-DTA without an MRP and BAS) are eligible for BFET.

## SBCTC BFET Program

The purpose of the BFET program application is for existing community and technical college (CTCs) BFET providers to specify the training and support services they will deliver and leverage for reimbursement for FFY25. To prepare a BFET program application, providers are encouraged to review and discuss historical expenditure trends, enrollment, and leveraging opportunities within their institution. It is important for program staff to work with their fiscal staff to ensure continuity of budget projections for both BFET direct funds and leveraged funds.

## Student Support Programs Canvas Community

The Student Support Programs Canvas Community is SBCTC's hub for BFET program resources, system messages, trainings, and other events. It serves the same purpose for other Student Support Programs like Wokfirst, SEAG, Opportunity Grant, and more.

For general Canvas questions or to be added to the Canvas Community, email [studentsupport@sbctc.edu](mailto:studentsupport@sbctc.edu). In your message, include which Student Support Programs you work in.

# Applicant Information

## Who May Apply

Community and technical colleges (CTCs) which have received approval from the SBCTC and the Department of Social and Health Services (DSHS) may apply for the FFY25 Basic Food Employment and Training program.

## How Does the Provider Apply?

Access the 2024-25 BFET Program application through the Online Grant Management System ([OGMS](#)).

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 FFY25.

Submit completed program applications to the SBCTC through OGMS no later than July 25, 2024, at 11:55 p.m. SBCTC staff are available for assistance until 4:00 p.m. on July 25, 2024.

## Application Process

The SBCTC's fiscal and program staff will review your application and provide feedback, if changes are required. After your application is approved by SBCTC, your BFET budget workbook is approved by the SBCTC and DSHS, and the SBCTC board approves the overall budget, the SBCTC will approve your application in OGMS.

Please note that for an application to be considered complete the following items must be submitted:

- FFY25 DSHS BFET Budget Workbook
- Alternative Forms (if applicable)
- FFY25 BFET Applicable Laws and Data Security Requirements

## Applicable Laws and Data Security Requirements

A completed and signed Applicable Laws and Data Security Requirements document must be uploaded to the attachment of your program application in OGMS. Ensure a thorough review of the listed requirements as these are a requirement of the program and receiving funding.

## Fiscal Accountability Questions

Fiscal accountability questions must be completed in OGMS. These answers, along with other factors such as monitoring and audits, will help SBCTC determine the fiscal accountability of each grantee.

## Program Mix Evaluation

In preparation for the program application and BFET Budget Workbook process, applicants will need to evaluate their current program mix with consideration to the purpose and intent of BFET outcomes.

Elements to consider include:

- Ability to co-enroll students across multiple programs to best support students
- Providing access to services to increase student achievement (i.e. tutors, support services/participant reimbursements, external/internal resources)
- Providing access to services to increase economic security (i.e. financial literacy, career services)
- Geographic responsibility, collaboration with local community-based organizations, student accessibility, and program cost

Collect and evaluate data on previous program enrollment, co-enrollments, expenditures, and leveraging sources to create your overall program mix. College BFET programs are encouraged to work with their fiscal staff on developing the annual projections for the BFET application.

## Disclaimer

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

The SBCTC reserves the right to refrain from granting to any or all applicants. Additionally, SBCTC reserves the right to add additional program 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 program requirements. Any additional requirements will be outlined for individual applicants prior to applicants accepting any resulting program funding.

## Reimbursed and Reutilized Funds

The BFET program can claim a 50% reimbursement for 100% of the non-federal funds already being expended on BFET enrolled students and staff providing unique support related to BFET.

Common types of sources that are leveraged across the system include but are not limited to: WA College Grant, Opportunity Grant, Worker Retraining, and foundation funds. No federal funding may be leveraged for BFET. Reimbursed funds are the funding that the college receives via the BFET invoice. The BFET invoice is based on expenditures across all leveraged sources and feeds into the BFET 146 Fund. This is the only funding the BFET program has to expend.

Expenditures claimed for BFET reimbursement must be tracked back to the original funding source and colleges must maintain such tracking in their fiscal records. Tracking of expenditures includes items such as internal tracking documents, general ledgers, queries, monthly Local Funds Certification Forms, and/or other spreadsheets that identify all funding sources being reimbursed for, total amount of funds expended from each of those funding sources, staff and/or students the funds were expended on, and the 50% reimbursement amount for the invoice.

Colleges may not have more than one BFET account. Reimbursements received for BFET must stay with the BFET program and in a fund 146. BFET funds can be used to build capacity in the program, expended on BFET related activities, and/or returned to the original funding source at no more than 50% of the total amount leveraged from that source for BFET during the program year.

Example:

- Opportunity Grant has expended \$15,000 in tuition and \$5,000 in wrap around supports on BFET co-enrolled students during fall and winter quarters. BFET has leveraged \$10,000 of that \$20,000 total expended funds from Opportunity Grant. Now, we are coming up on spring quarter and the Opportunity Grant has run short on funding and does not have enough to support students. The BFET program can opt to return up to half of the funding the program has leveraged over the course of the program year. In this example, \$5,000 can go back to Opportunity Grant as the original funding source. The remaining \$5,000 will remain in the BFET 146 Fund. Colleges will track this transfer of funds on their Reutilized Funds Tracking worksheet as "expended but not reutilized" noting that \$5,000 was returned to Opportunity Grant.
- Worker Retraining has expended \$10,000 in tuition on co-enrolled BFET students and \$5,000 in salary & benefits for staff supporting BFET work, totaling \$7,500 in leveraged reimbursement from fall quarter. Worker Retraining is in need of additional dollars for winter quarter to support students. The BFET program can opt to return up to half of the funding the program has leveraged in fall quarter to the Worker Retraining program, however, the Worker Retraining Program only needs \$2,500 to support two additional students. The BFET program can complete this transition as it is less than half the amount of funding the BFET program has leveraged for the program year thus far. The remaining \$5,000 will remain in the BFET 146 fund. Colleges will track this transfer of funds on their Reutilized Funds Tracking worksheet as "expended but not reutilized" noting that \$2,500 was returned to Worker Retraining.

Please note that funds returned to the original funding source no longer need to be tracked for BFET program purposes. Additionally, colleges should work with their financial aid and fiscal offices to build an understanding of local funding that may not fall within the ability to return funding to. For example: WA Bridge Grant or WA College Grant.

BFET reimbursements, once received by the college, are considered local funds. Federal regulations allow for the opportunity to reuse funds that have been reimbursed for allowable BFET activities and submit those expenditures for reimbursement. This is known as reutilized funding. In order to participate in reutilized funding during the federal fiscal year, you must participate from the beginning of the year and submit the Reutilized Funds Tracking spreadsheet and Local Certification Form with every billing cycle. The SBCTC BFET Reutilized Funds Tracking spreadsheet can be found in the Grant Information section of OGMS within the Billing/Invoicing Workbook.

All funds expended from the college's BFET fund 146 must be tracked in the Billing and Invoicing Workbook in the Reutilized Tracking Tab and submitted with the invoice in OBIS. These funds must be tracked separately from all other funding sources to ensure accurate accounting of all funds. Use of alternate forms is not approvable.

SBCTC Quick Reference Guides (QRGs) are available for BFET billing and invoicing on the [SBCTC's ctclick reference center](#).

## Budget & Narrative Guidance

The Basic Food, Employment and Training (BFET) program requires 100% up-front expenditures to receive 50% reimbursement. Your BFET budget in OGMS is not what you have to expend for BFET, it is the amount you can bill up to. In your budget narrative, include a description of your 100% up-front expenditures and the sources you will leverage to generate the reimbursement. However, your budget should only include dollar amounts for the 50% reimbursement your college will receive.

Please note that your budget amounts and narrative should match your approved DSHS BFET Budget Workbook and include all funding sources you will be leveraging for the program year, including BFET direct expenditures from the BFET fund 146.

### Budget Activities

The following list identifies all eligible BFET program components by activity (also known as a budget line or line item). The DSHS BFET Budget Workbook should be utilized as a resource for completing the budget narrative section of the application in OGMS.

#### General

Necessary and reasonable costs for:

1. Direct Services - services provided directly to or directly on behalf of students.
2. Administration - proper administration of the BFET program.
3. Strategies for Success Training/Life Skills - costs associated with providing these services to BFET students.

Be sure to break out costs for direct services, administration, and strategies for success training/life skills in budget narratives in the Online Grant Management System (OGMS).

#### Tuition

Tuition and associated fees paid for BFET-eligible students.

### Participant Reimbursements

Necessary and reasonable costs for support that students may need to participate in the BFET program. All participant reimbursement expenditures must be fully documented by a Washington State Department of Social and Health Services (DSHS) Participant Reimbursement form (or an SBCTC-approved alternate form)



and verified by itemized receipts and/or documentation of expenditure. Colleges may award participant reimbursements to students via the approved bankmobile policy.

Please refer to the Participant Reimbursement Categories section for more information on the types of supports allowed.

## 100% Funding

If DSHS offers 100% funding to providers, the following information applies:

This funding does not require a non-federal source, may be reimbursed at 100%, and may only be used for purposes specified by DSHS. If 100% funding becomes available, DSHS will send out application announcements in May or June. There is no guarantee of funding availability and applications must be approved by DSHS.

## 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). Listed below is a general overview of the budget categories.

## Salaries, Wages, and Benefits

In your budget narrative, please be sure to include all position titles, percentages of effort/FTE/salary/hourly wage information, and a brief description of duties by position as they relate to BFET. Please put each position on a new line of text. This information should match the information in your BFET Budget Workbook on the Detail Worksheet Tab.

### ***Budget narrative format:***

- You must use the format provided in the example below when completing your program application in OGMS.

**Please put each position on a new line of text.**

- As noted above, include narrative for 100% of your expenditures.

### ***Examples:***

- BFET Coordinator, 70%  
Meets with students to develop Individual Employment plans, assists with applications for basic food, conducts quarterly meetings with BFET students.
  - Salary:  $0.7 * \$60,000 = \$42,000$
  - Benefits:  $0.28 * \$42,000 = \$11,760$
- Program Assistant, 200 hours at \$16/hour  
Work directly with students to report progress, assists with BFET program orientations.
  - Salary:  $200 * \$16 = \$3,200$
  - Benefits: \$200
- Faculty, .2 FTEF  
Provides vocational instruction to BFET students.
  - Salary:  $.2 * \$50,000 = \$10,000$

- Benefits:  $.28 * \$10,000 = \$2,800$
- Workforce Director, .2 FTE  
Manages BFET grant, quarterly reporting, oversees BFET staff, manages budget, coordination with internal and external partners on program activities, assess program effectiveness/outcomes.
  - Salary:  $0.2 * \$90,000 = \$18,000$
  - Benefits:  $0.30 * \$18,000 = \$5,400$
- Program Specialist, 15%  
BFET student coding, enter student notes into eJAS, prepares quarterly billing.
  - Salary:  $.15 * \$45,000 = \$6,750$
  - Benefits:  $0.25 * \$6,750 = \$1,675.50$

## Goods and Services

***DSHS Category Name: Administrative Services***

Goods and services for administration of the BFET program. Note: any goods and services purchased that will not be used exclusively for BFET must be split among other funding sources.

Goods: Items with an individual acquisition cost of less than \$5,000 or a useful life less than one year.

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

***Budget narrative format:***

- You must use the format provided in the example below when completing your program application in OGMS.
- As noted above, include narrative for 100% of your expenditures.

Examples: office supplies used for administration of the program, registration fees for staff professional development, telephone, utilities, building space/lease, and service such as janitorial services, computer maintenance, copier maintenance, and shredding services.

Non-consumable items purchased shall remain in the property of the 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 program 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 recipient (the college) reimburses travel under this program the same OFM travel rates and regulations must be applied.

Be sure to budget the funds necessary to participate in the annual DSHS BFET training forum as necessary.

Colleges must maintain travel documentation (travel approval, mileage, hotel folio, etc.) within their fiscal records.

***Budget narrative format:***

- You must use the format provided in the example below when completing your program application in OGMS.
- As noted above, include narrative for 100% of your expenditures.

***Example:***

- Staff travel to extension campus locations to meet with BFET students
- Staff travel to quarterly BFET provider meetings

## Client Services

Goods and services that are student related. Examples include printing (forms, etc.), outreach materials, supplies related to the student such as file folders, laptops and WiFi hotspots for loaning out to students, and postage for BFET.

## Tuition

Tuition and associated fees for BFET-eligible students.

## Participant Reimbursement Categories

Participant reimbursements (PRs) fall under the various categories as defined below and unique requirements may apply to each. Please see [DSHS's BFET Handbook](#) and/or Participant Reimbursement Directory for more information.

## Books

***DSHS Category Name: Books, Tools, and Supplies***

Textbooks, tools, training materials and other reasonable and necessary school supplies for training or employment. Must have training program or employer verification for the required items.

- Participants with disabilities may receive assistance with reasonable and necessary purchases of goods or services (including testing) that accommodate the individual's disability.

## Clothing

Clothing necessary for program participation (e.g. uniforms, protective clothing), job interviews, or to participate in an approved BFET activity. Clothing is limited to a maximum amount of \$800 per student, per program year.

## Childcare

Childcare needed for program participation is allowable if one of the two situations apply:

- If the participant is ineligible for childcare through Childcare Subsidy Program (CCSP). The participant file must include denial of CCSP eligibility.
- If the participant receives CCSP and needs assistance with initial copay.

## Housing

Costs may include emergency housing assistance. Ongoing housing assistance is not allowed. Cannot be used for mortgage payments, mortgage insurance, or mortgage taxes. Housing assistance is limited to a maximum amount of \$5,000 per student, per program year.

## Personal Hygiene

Personal hygiene products and services necessary to meet potential employer's standards. Personal Hygiene is limited to a maximum amount of \$800 per student, per program year.

## Testing

*DSHS Category Name: Educational/Credential Testing*

Testing includes literacy level, aptitude, college entry exams, skills proficiency, and high school equivalency (HSE) testing.

This category also includes finger-prints, drug testing, licensing, and reasonable accommodation expenses.

- Driver's License Testing and Standard Fees: must be related to the participants' BFET activities. Unallowable costs: debts, outstanding fees, fines, or suspended licensing.

## Medical

Medical support may include medical, vision (eye exams and eyeglasses), and minor dental costs. Medical assistance can be provided after all other resources have been exhausted, including coverage through the Affordable Care Act.

## Transportation

Transportation support may include transit tickets, bus passes, parking passes, ID/drivers' license, testing and fees for licenses, fuel cards for participant-owned vehicles, and automobile or bike repairs. Auto repairs require additional documentation. Transportation is limited to a maximum of \$1,600 per student, per program year.

## Digital Supports

Digital Support may include digital devices and accessories such as a laptop, monitor or screen, mouse, mousepad, headphones, and webcam. Laptops purchases are limited to a maximum amount of \$700 per student, per program year.

## Phone and Internet

Phone and internet Support includes cell phones and cellphone minutes if required to participate in an activity. Internet Services can be covered but must be separated if bundled with other services.

## Bulk Purchases for Participant Reimbursements

Examples of bulk purchases include, but are not limited to fuel cards, gift cards, personal hygiene items, and tools.

For each bulk purchase, an agency staff representative must be the designated custodian of the items. One or two staff backups may be designated. The provider's internal controls must clearly designate the custodian and backups. The custodian is responsible for ensuring that all purchasing, security, dispensing, tracking, and replenishing procedures are followed.

All purchased bulk items must be secured at all times, i.e., in a locked box inside a locked cabinet or drawer accessible only by the custodian and designated backup and identified as BFET items.

All distributions from the bulk items issued should be documented in a log (spreadsheet) or in a standard (pre-numbered) receipt book. The log must uniquely identify each payment receipt in order to document the appropriate use of the card or item for audit purposes.

The custodian must also keep an inventory log (e.g., a spreadsheet) of fuel/gift card bulk purchases and disbursements for audit purposes.

The log should include the following: card type, entire card number, date received (or list the bulk item), who received the card/item, and who issued it. A reconciliation of fuel/gift cards should be conducted whenever gift cards are purchased or at least quarterly. This reconciliation should consist of verifying that the number of cards purchased minus the number of cards disbursed agrees with the number of cards on hand. In addition, the value of the cards purchased should agree with the amount recorded in the general ledger. The inventory reconciliation needs to be performed by an individual who is not responsible for the issuance or custody of the fuel/gift cards (preferably the department approver) and in the presence of the custodian.

## Work Based Learning (WBL)

To be eligible to provide Work Based Learning, you must notify the SBCTC prior to including WBL in your BFET Budget Workbook and program application. The SBCTC will provide you with initial approval to include WBL. DSHS must give final approval for WBL.

If you have been approved to provide Work Based Learning for the FFY25 Budget year; please follow the guidance given above for all categories.

WBL options vary and are to be funded with BFET funds ONLY. You must specify what WBL options you are providing (subsidized WBL, unsubsidized WBL, On the Job Training (OJT), apprenticeship, etc.) Some of the options are reimbursable while others are not. For each WBL option you provide, you will need to itemize the information (amount per student, number of students, types of WBL being provided, etc.). All information should match the information found in the BFET Budget Workbook.

Participant Reimbursements for WBL are to be budgeted in the WBL activity within the program.

### ***Budget narrative format:***

- You must use the format provided in the example below when completing your program application in OGMS.
- As noted above, include narrative for 100% of your expenditures.
- Example: Salaries and Wages:
  - Internships Subsidized with BFET Funds: 5 positions \$10,000 stipend each and total of \$50,000
  - Apprenticeships, Subsidized with BFET Funds: 2 positions \$20,000 stipend each and total of \$40,000
- Example: Participant Reimbursement
  - Transportation
    - Internships subsidized: 5 students \$100 each and total of \$500
    - Apprenticeships subsidized: 2 students \$250 each and total of \$500

## Indirect - General Funding Line

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

Colleges may budget and invoice up to their federally approved indirect rate for those categories allowed per their approved rate, i.e., salaries only, salaries/benefits, or modified total direct costs (MTDC), budgeted to and invoiced on the General funding line of the grant. DSHS allows for a 15% de minimis for those without a negotiated rate.

- Colleges who have a federally approved indirect rate must upload a copy of their federal approval letter (NICRA) to their program application in OGMS prior to the start of the program.
- Colleges without a federally approved indirect rate may apply the de minimis rate of 15% of Modified Total Direct Costs (MTDC) budgeted and invoiced to the General funding line of the program.

MTDC means all direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel, and up to the first \$50,000 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 \$50,000

2 CFR Title I, Chapter II, Parts 200.1

Indirect may only be budgeted for reimbursed expenses being claimed within the allowed federally approved rate or the 15% de minimis.

Indirect may not be budgeted or invoiced against this program for the remaining 50% of the up-front costs not included in your budget.

On Local (Leveraged Funds/Match) Certification Forms, colleges must include expenses for the other half of their indirect costs billed to the General line.

***Per DSHS, colleges are required to invoice indirect with each billing cycle.***

## Indirect – 100% Funding Line

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

Colleges may budget and invoice up to their federally approved indirect rate for those categories allowed per your approved rate, i.e., salaries only, salaries/benefits, or modified total direct costs (MTDC), budgeted to and invoiced on both the General and 100% Funding lines of the program.

- Colleges who have a federally approved indirect rate must upload a copy of their federal approval letters to their program application in the Online Grant Management System (OGMS) prior to the start of the grant.
- ***Colleges without a federally approved indirect rate*** may apply the 15% de minimis rate to costs budgeted to the General and 100% Funding lines of the program.

Indirect costs billed to the 100% Funding line should not be included on Local (Leveraged Funds/Match) Certification Forms.

***Per DSHS, colleges are required to invoice indirect with each billing cycle.***

## Budget Revisions

SBCTC approval of a revised budget is required if there is more than a 10% variation in expenditure levels by individual budget cell, though there can be no variance in the total budgeted for each activity. You may invoice for up to 10% more in budget cells as long as the budget line for the corresponding activity does not exceed the total budgeted.

Per the statewide agreement from DSHS, movement of funds between General and Tuition budget lines (activities) is not generally allowed but may be possible with prior permission from SBCTC. Contact [Denise Costello](#) and [Sheila Acosta](#) to obtain permission to move funds between those two budget lines prior to submitting a budget revision in OBIS. Budget revisions are also required to be submitted after a funding survey in which a college has been approved for either an increase or decrease to a budget category. Budget revisions submitted directly after a funding survey must only contain changes that were approved in the funding survey and accounted for in the BFET Budget Workbook. Colleges are required to update and submit their BFET Budget Workbook with their funding survey requests.

After DSHS accepts the last contract amendment of the program year, generally in June, any budget revision made to current budget amounts must follow the DSHS requirements of only 10% of a single budget category may be moved within the same line item. Participant Reimbursement funds may not be moved out of the Participant Reimbursement line item and no funds from other line items may be moved into Participant Reimbursement categories.

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

***Final budget revision deadline: September 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.

## Funding Surveys

SBCTC staff will conduct funding surveys throughout the year to monitor actual and obligated expenditures and to ensure applicants are billing out their budgets. Through this process, applicants have an opportunity to request either a reduction or an increase in their program amount. When requesting a change of funding, applicants must provide a justification for their request, including the total amount billed and obligated (promised to students but not yet billed for), and a fact-based rationale for additional funding.

These surveys are contractually required administrative activities and must be completed and submitted to SBCTC by the deadlines provided. Required budget revisions resulting from funding survey may not include additional revisions. Once your required budget revisions are approved, you may submit additional budget revisions.

## Invoicing

Funds for the BFET program must be claimed on a reimbursement basis. No payments in advance of or in anticipation of services or goods provided under this program shall be requested or paid. All costs must be reported for the quarterly period incurred and colleges must have backup documentation for each individual month of the quarterly billing cycle that account for the months' expenditures. Indirect charges must be invoiced with each billing cycle based on actual expenditures.

Colleges must have fiscal processes in place for invoice review and payment approval to ensure invoices are accurate prior to submitting the billing to SBCTC.

Reimbursement requests must be submitted in alignment with the quarterly invoicing schedule. No monthly invoices will be accepted. Invoices are submitted via [OBIS](#) and **must include the signed quarterly Local Certification Form and the completed SBCTC Billing and Invoicing Workbook**. Colleges may not bill for costs

that are not identified in their approved DSHS BFET Budget Workbook. All costs must be submitted for reimbursement in accordance with the schedule shown below.

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

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.

## Billing Cycle

The BFET program funding and billing process is aligned with the federal fiscal year. Funding awarded October 1, 2024, will cover fall quarter expenses incurred after September 30, 2024, and winter quarter, spring quarter, summer quarter, and fall quarter expenses incurred prior to October 1, 2025. The BFET program is required to bill quarterly for expenses incurred for all months by the deadline, including all indirect costs. If a colleges is unable to meet the invoice deadline, an email outlining the reason for the delay and intended submission date **must** be sent to [Sheila Acosta](#) and [Denise Costello](#) prior to the invoice deadline. The SBCTC will respond with specific instructions for submission of the invoice past the deadline. Late invoices may not be approved without communication to the SBCTC and could result in monitoring and/or audit findings.

## Eligible Expenditures

Eligible BFET services are limited to those expenditures that are above and beyond what is provided to the general student population at no cost. Additionally, eligible expenditures continue to be what is necessary and reasonable for participation in the BFET program.

## Examples of eligible expenditures:

### Program Administration

Activities necessary for the proper administration of the BFET program.

- Salaries and benefits for staff providing unique\* services for the BFET program (e.g. staff responsible for data entry and tracking of BFET students, staff attending BFET providers’ meetings, staff responsible for maintaining BFET files)
- Goods and services used by personnel providing unique\* services (e.g. stamps, supplies, postage, small equipment)



- Indirect – refer to the Indirect section of this document.
- **\*Please note:** Staff supported by college general funds dollars that are not necessary, reasonable and unique to the BFET program is not an eligible charge to the program (e.g. financial aid staff performing the same services as offered to the general student population- i.e. applying awards in FAM). Some services offered to Workforce students are considered to be above and beyond that offered to the general student population. Cost of instruction is not an eligible source of non-federal funds.

## Direct Services

Staff and supplies associated with the following offering unique\* BFET services.

- Front end BFET eligibility/enrollment process (e.g. staff assisting students with eligibility and enrollment, computer for online applications)
- Case management (e.g. staff that meet with students to assess and assist with barrier removal or need for child care)
- Development of an individual employment plan (e.g. staff that assess interests, skills and abilities with students)
- Required reporting and monitoring (e.g. staff that may have direct student contact to verify enrollment)
- Client services such as printing, marketing, supplies related to students (folders, labels etc.), postage, and laptops and WiFi hotspots for loaning out to students.
- Laptop Loaner Program
  - The purchase and loaning of equipment and services to BFET students in an effort to assist them with remote access to enable them to participate in their BFET activities is an allowable expenditure for BFET reimbursed funds. The BFET student must have an open component. You may bill for 50% reimbursement of this cost to your Client Services budget category
  - Colleges purchasing equipment and services to loan to students must ensure the equipment remain the property of the college, and must be inventoried and managed as per BFET Fiscal Guidelines and SAAM policies. Please check with your individual college IT department to ensure your college has technical access policies in place to track and maintain acceptable usage of equipment loaned to students who are offsite.
  - Sample items to loan students to ensure access and engagement in online courses include, but are not limited to: laptops, internet equipment, video cameras, or computer cables.
  - Any items purchased with FY25 funding must be received and put into inventory (available for use) this fiscal year by September 30, 2025. Any purchases made with FY25 state funds leveraged for BFET must be received and put into inventory by June 30, 2025. Any purchases made with reutilized BFET funds can be received after June 30,2025.
  - If you choose to have a laptop loaner program, please read the contract addendum in Appendix F to ensure your college can meet all the requirements.

## Funding Options

BFET funds can be used to cover the cost of tuition, fees, books, and supplies as well as support services that are necessary and reasonable for the student to continue to participate in a BFET activity, that are not covered by other sources of funding or financial aid for which the participant qualifies. Please refer to the

Participant Reimbursement Support Section for more information.

BFET policy is aware that in some instances, such as with work study, students do not have access to the total amount of the award up front. However, the policy regarding the use of BFET funds does not make allowances for these situations. The college must ensure, in some way, that no BFET funds are used to pay costs covered by other sources of funding (work study funds in this case).

## Terms & Information

### General

Funds for these grants are provided to the (SBCTC through the DSHS from the U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS) under CFDA 10.561.

Non-compliance with terms may impact current or future funding.

### Allowable Costs

Allowable costs are determined by 2 CFR Subpart E (parts 200.400-475). All expenditures submitted for reimbursement under this program must be necessary and reasonable for proper and efficient administration of the BFET program.

The following state and federal regulations must be followed:

#### Applicable Washington State Regulations

The State Administrative and Accounting Manual ([SAAM](#)) must be followed.

#### Applicable OMB Guidelines (Federal)

[2 CFR](#) Title I, Chapter II, Part 200 (Uniform Administrative Requirements, Cost principles, and Audit Requirements for Federal Awards).

### Purchased Items – Tracking

All non-consumable items purchased with grant funds shall remain the property of the grant recipient. “Small and Attractive” items must be under inventory control.

### Purchased Items – Disposal of Items

Per 2 CFR 200.314, when a grant recipient’s BFET 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:

- Bad debt expenses
- Cost of construction or purchase of facilities or buildings
- 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

- Sectarian worship, instruction, or proselytization
- Light refreshments
- Promotional items and memorabilia including, but not limited to tote bags, key chains, t-shirts, pens, magnets, etc.
- Cost of Instruction
- Tuition waiver or other in-kind contribution that cannot be tracked as an expenditure to an individual BFET student

## Contract Management & Fiscal Accountability

Colleges must have identified back-ups in place for key fiscal and program staff to continue to administer the program and meet deadlines.

## Debarment and Suspension

The program 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

All expenditures claimed for reimbursement must be documented in your fiscal records. Colleges need to have fiscal processes in place to ensure that the BFET fund 146 is monitored, reconciled, and accurately tracked and reported on the BFET Reutilized Tracking Worksheet in the Billing and Invoicing Workbook.

BFET Reimbursed funds must be kept in an account separate from all other funding sources and be accounted for as local fund (fund 146). Use the **BFET in ctcLink [ORG](#)** as a guide to set up and manage the BFET Reimbursement Process in ctcLink.

## Setting Up BFET in ctcLink:

The SBCTC Education Division implemented the following policy for how colleges set up their BFET program in Peoplesoft.

Effective October 1st, 2022, colleges offering BFET programs will implement and follow a global process for the set up in Peoplesoft for leveraging BFET reimbursement on administrative costs which include staff salaries, benefits, travel, goods/services, and F&A/indirect. This global process requires the use of the program chartfield value in budgets and expenses and does not require changes for student expenses.

This policy is in place for the administrative activities only, no changes were made to the student support side of the program. The program chartfield value is turned on for non-grant. Colleges should not be setting up their BFET program as a project or grant in Peoplesoft.

**Complete QRGs for this process can be found on the SBCTC ctcLink Reference Center under [9.2 BFET in ctcLink](#). BFET Reimbursed Funds and 100% Funds as a Secondary Source**

Other sources of funding and financial award packages must be fully utilized to cover all costs prior to the use of BFET reimbursed funds or 100% funds. Colleges may not use BFET funds if participants have been funded to their maximum need level by another available resource. Colleges may not consider that BFET funding might be available to students in determining the financial need they would otherwise get.

In addition, if a college encounters this scenario, the college must document the financial aid award, the eligible costs, and the disbursement of the financial aid to cover those costs and clearly show the balance that was charged to BFET in your accounting records.

## 100% Funding

Funds for the 100% Funding activity must be kept in an account separate from all other funding sources and be accounted for as grant and contract (fund 145). For directions on setting up a cost-reimbursable grants in ctcLink, please [see the "Reimbursable Grant - Creation to Activation" QRG](#).

Set up this grant in ctcLink using the following information:

Grant Type: As Incurred/Cost Reimbursable

Sponsor ID: FIN00107

CFDA/Assistance listing: As of FY25 - do NOT enter the CFDA/ALN number in ctcLink for grants from SBCTC.

F&A Distribution Department: 98219

F&A Rate Type: IND

F&A Base Budget: MTDC

FA Rate %: 8.00

Project Type: 02012

Fund: 145

Class: See [NACUBO Code Section, below, 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.

- Instructional budget line: 118
- Administration budget line: 143

## 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, handicap, or political affiliation or belief.

## Program Income

Generating program income with BFET funds is not allowed.

## Public Announcements, Disclosure of Federal Funding

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

- The dollar amount of federal funds for the project;
- The percentage of the total cost of the project financed with federal funds; and
- The percentage and dollar amount of the total costs of the project financed by non-governmental sources.

## Records Retention

Financial management systems shall reflect accurate, current, and complete disclosure of all cost expenses for program activities. Program 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](#).

## 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.

## Termination

This program may be terminated by the SBCTC upon giving notice in writing to the program recipient at least thirty (30) days in advance of the date of termination. If the program is terminated for any reason, all reports and data gathered by the program 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 the program 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 program recipient violates any terms and conditions of the grant or program, SBCTC will give the program recipient notice of such failure or violation. Program recipients will be given the opportunity to correct the violation or failure within thirty (30) days. If failure or violation is not corrected, this program 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 program 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.

## 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.

## Enrollment with Multiple BFET Providers

Colleges are required to collaborate with other BFET providers to ensure students are receiving all needed services to overcome barriers, successfully complete E&T and eventually attain employment. Individual Employment Plans can include activities from more than one BFET provider as long as there is not a duplication of services. Each BFET provider will receive a separate component code in eJAS to track their portion of the student's activities. A separate agreement is not necessary for partnerships with other BFET providers, as collaboration is an obligation of our contract with DSHS.

## BFET Program Compliance

### Compliance with Applicable Laws

- [Omnibus Crime Control and Safe Streets Act of 1968](#)
- [Title VI of the Civil Rights Act of 1964](#)
- [Section 504 of the Rehabilitation Act of 1973](#)
- [Title II of the Americans with Disabilities Act of 1975](#)
- [Title IX of the Education Amendments of 1972](#)
- [The Age Discrimination Act of 1975](#)
- The Department of Justice Non-Discrimination Regulation:
  - [28 C.F. R. Part 42, Subparts C,D,E. and G](#)
  - [28 C.F.R. Part 35](#)
  - [28 C.F.R. Part 39](#)

## BFET Provider's Handbook

In addition to requirements identified in the BFET Program Guidelines and Fiscal Guidelines document, compliance with DSHS policies and procedures as outlined in the BFET Provider's Handbook is also required. Colleges should ensure that all staff are appropriately trained on the guidelines within the BFET Provider's Handbook.

## BFET Policy and Procedure Manual

BFET providers must develop and maintain a local policy and procedure manual for their program to ensure services are maintained and program requirements are met in the absence of, or change in, staffing. This manual should include policies and procedures for both administrative functions and for student services

functions and be updated as necessary to reflect program and/or process changes. A BFET Content Guide for Policy and Procedure Manual is included in the Appendices.

## Outreach and Recruitment

BFET providers are expected to conduct self-directed outreach and recruitment activities at their college and in their community.

All printed materials, either paper or electronic, must contain the USDA Non-Discrimination Language (DSHS [Provider Handbook](#)).

Television and Radio broadcasting for the BFET Program is not allowed and cannot be reimbursed.

## Time and Effort

Federal regulations under 2 CFR 200.430 require employees whose salaries are charged to a federal grant/program to keep time and effort reports to substantiate the charges. Time and effort reporting guidelines may be found [online](#).

All employees funded, in whole or in part, from BFET funds or funding used as leverage must have up-to-date time and effort records that account for 100% of the employee's time. Required time and effort reporting information can be found in the online [Time and Effort Guidelines](#) and in the Canvas Community Training Module. Time and effort is required to be provided for the current program year at the time of monitoring or audit.

Time and effort reports for employees whose time is used as leveraged up-front expenditures for BFET must contain a reference to both the original funding source and the time that is being billed for reimbursement by the BFET program.

Allowable time and efforts include after-the-fact reporting, plan confirmation, and multiple confirmation systems. Note: classified staff must complete after-the-fact reporting at least monthly.

Time and efforts must clearly show the time spent on BFET related activities for all sources leveraged. For each source being leveraged for BFET, if there is time being spent on the original funding source that is not related to BFET, the time and effort should have two separate line items that show the amount of time spent on the original funding source (OP Grant, WRT, etc.) and the amount of time spent on co-enrolled BFET time/activities (OP Grant/BFET, WRT/BFET, etc.).

**Example:** an employee paid 100% from WRT supports WRT/BFET co-enrolled students 50% of the time. The time and effort should reflect the time spent on WRT ONLY and the time spent on WRT/BFET.

WRT 50%

WRT/BFET 50%

If the employee is not spending time on anything but BFET related activities, it is allowable to have a single line item that represents the original funding source and BFET together.

**Example:** an employee paid 100% from Op Grant supports Op Grant/BFET co-enrolled students 100% of the time. The time and effort should reflect all the time in a single line:

Op Grant/BFET

The amount of time reported should be reviewed and assessed for variance and reconciliation of actual activities and payroll throughout the program year to ensure billing is accurate for the time and effort being reported.

## Mandatory Training

All BFET staff must complete training in the following areas on an annual basis. New staff must complete training within 30 days of hire and submit to SBCTC at StudentSupport@sbctc.edu. Verifying documentation of the completions must be submitted to the SBCTC no later than 10/31 annually and retained at the college:

1. Understanding and Abiding by the Civil Rights Act of 1964\*
2. Abuse Reporting\*
3. Fraud Reporting \*
- i. \*Videos are linked in this document. Both Abuse Reporting and Fraud Reporting are addressed in the same video.

## Mandatory Reporting

All BFET staff are mandatory reporters for welfare fraud and abuse reporting. Any knowledge of welfare fraud must be reported to DSHS by calling 1-800-562-6906. Any knowledge of suspected abuse to children or vulnerable adults must be immediately reported by call 1-800-END-HARM (1-800-363-4276). Records, Data Security, and Confidentiality

## Maintenance of Records

All records and other materials relevant to this grant shall be retained for six (6) years after the program year ends, or six (6) years after any audit.

## Maintaining Confidentiality

Confidential information must not be used, published, transferred, sold or otherwise disclosed.

## Notification of Compromise or Potential Compromise

A compromise or potential compromise of confidential information must be reported to the SBCTC within one (1) business day of discovery.

## Notice of Non-disclosure

All employees with access to confidential client information must have an up-to-date DSHS Confidential Information, Fraud and Abuse form (DSHS 03-374E – Rev. 11/2014). Employees that require access to eJAS must also complete the request for access at the bottom of this form. These forms must be renewed for all employees at the start of each Federal Fiscal Year and no later than 10/31 and submitted to SBCTC. **Staff must notify the SBCTC of termination of any employee with access to eJAS within three business days.** Forms and notification of termination should be sent to Student Support Programs at [StudentSupport@sbctc.edu](mailto:StudentSupport@sbctc.edu) .

## Securing Confidential Information

- Only authorized staff are allowed access to confidential information
- Computers, documents, or other media containing confidential information are secured
- Ensure security of faxed confidential information (confirm #, communicate with recipient, verify receipt)
- Paper documents containing confidential information are transported using a Trusted System
- Electronic confidential information is either encrypted or shared through a Trusted System (refer to the Data Security section for further details)



## Data Security

Colleges must adhere to the “Data Security Requirements” contained in the 2024-25 BFET Program Assurances document in OGMS.

Colleges, their employees, volunteers, etc., must also adhere to the eJAS nondisclosure provisions as described on the eJAS nondisclosure form. Violations of nondisclosure provisions may result in criminal or civil penalties. Violation is a gross misdemeanor under RCW 7A.04.060, punishable by imprisonment of not more than one year and/or a fine not to exceed five thousand dollars. Colleges must notify all authorized persons, who require access to data, of the use and disclosure requirements and penalties for unauthorized use/disclosure.

All employees with access to client information must have an up-to-date Confidential Information, Fraud and Abuse form (DSHS 03-374E - Rev. 11/2014). Employees that require access to eJAS must also complete the request for access at the bottom of the form. This form must be updated for each employee in September of each program year and sent to the SBCTC Student Support Programs at [StudentSupport@sbctc.edu](mailto:StudentSupport@sbctc.edu).

## Civil Rights & Non-Discrimination Statements

All printed materials, either paper or electronic, must contain the USDA Non-Discrimination Language:

- In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity.

The full Nondiscrimination Statement must be on all materials the participant signs:

- Application Form (s)
- Notification of Eligibility or Ineligibility
- Notice of Adverse Action Form
- Provider’s program (Home) Web Page or a direct hyperlink to it
- Public Information, including program materials.

If the entire USDA Non-Discrimination Language will not fit on the printed material, the following statement can be used:

- This institution is an equal opportunity provider.

Translations of the Nondiscrimination Statement are on USDA FNS website.

## Participant Records, Forms, and Reporting

### Coding Students

#### PeopleSoft

BFET students are coded with a Student Group Code of SBFT. Student Groups are not associated with a specific YRQ, so you will not need to input the SBFT each quarter for continuing students, but programs will need to deactivate students once they are no longer participating in BFET. If the student becomes ineligible for BFET for winter quarter, you will want to inactivate the student’s BFET Student Group Code after fall quarter term end date. This way when the State Board pulls data at the end of winter quarter, the student’s most recent effective dated BFET record makes them inactive, and they will not count for winter quarter. This

is similar to how Legacy works as you want the students' coding to be correct by the last day of your quarter. For accuracy, do not make modifications for the next quarter until you are past your current quarter's end date.

## Example

If a student becomes eligible for BFET on 9/1/2020 and you code the student with the Student Group Code on this day, the effective date becomes 9/1/2020. When the State Board pulls data at the end of fall quarter, it looks for active codes that are dated less than or equal to your college's term end date. Therefore, this student would be counted as BFET for fall quarter.

You can find information on student coding on the SBCTC ctcLink Reference Center under [SBCTC Coding Reporting](#).

## System and College Enrollment Data

With an increased emphasis on accountability and performance, it is essential that BFET coordinators verify their college's student tracking data quarterly data before it is transmitted and work with campus registrars for quarterly reporting dates and timelines. Please visit the SBCTC website for [Data Warehouse Snapshot Schedule](#). The SBCTC (or data warehouse) can provide Basic Food Employment and Training coordinators outcome data. These reports will be deemed official and final. For accurate reporting and performance measurements, it is important that colleges count the same students that the SBCTC counts.

## Participant Reimbursement Support

Participant Reimbursement expenditures must meet the criteria delineated in the BFET Provider's Handbook. A detailed description of each category can be found in the BFET Participant Reimbursement Directory found on the BFET Resources Website. If you have questions on items not included in the Participant Reimbursement Directory, please email [Sheila Acosta](#) for approvals/clarification.

- Transportation: public transportation fare, fuel cards for personally-owned vehicles, necessary/non-maintenance repairs for a reasonable amount. Transportation assistance is limited to a maximum of \$1,600 per program year. Repairs must have at minimum two estimates from a licensed automobile mechanic. Estimates must itemize all repairs and costs necessary.
- Driver's License Testing and Standard Fees: Must be related to the participants BFET activities. Unallowable costs: debts, outstanding fees, fines, or suspended licensing.
- Educational/Credential Testing: aptitude testing, college entry exams, literacy/skills testing, etc. Participants may also receive assistance with the cost of testing and/or securing permits needed for training or to support job search activities. This category includes Finger-Prints, Drug Testing, ID/Citizenship, and Reasonable Accommodation expenses.
- Clothing: Clothing assistance is limited to \$800 per program year. Verification of cost of clothing is required in addition to the justification. Must include an itemized receipt.
- Childcare: If the participant is ineligible for childcare through the Childcare Subsidy Program (CCSP), but performs approved BFET activities, or needs assistance with the initial copay once approved for CCSP, childcare services through a third party may be approved.
- Medical: Assistance can be provided after all other resources have been exhausted, including coverage through the Affordable Care Act. This budget category also includes minor dental work and eye exams and eyeglasses.
- Digital Support: There are two sections for digital support 1) Portable Digital Device - this may include laptops, i-pads or tablets. Not to exceed \$700 per year. 2) Digital Device Accessories - this may include monitor, keyboard, mouse, headphones, webcam, USB, and any required software to

complete trainings etc..

- Books and Training Supplies: Participants may receive assistance with textbooks, training materials and other reasonable and necessary school supplies for training. This category includes work and training tools required by an employer/training program, and training materials.
  - Participants with disabilities may receive assistance with reasonable and necessary purchases of goods or services (including testing) that accommodate the individual's disability.
- Housing: Assistance can be provided after all other resources have been exhausted. Housing assistance is limited to a maximum of \$5,000 per program year. This category includes emergency housing expenses. Ongoing housing expenses, mortgage, electric, gas and other utilities are not allowed.
- Phone and Internet: Participants may receive help covering phone and minutes if required for participation in an activity. Internet can be covered, but if bundled with other services, only the internet portion can be reimbursed.
- Personal Hygiene: Assistance may be provided to the participant to meet employer appearance standards. Personal Hygiene assistance is limited to a maximum of \$800 per program year.

Exemption to the Rule (ETR) can be requested for providing supports that are not specifically outlined in the DSHS Participant Reimbursement Directory or are above the allowed annual cost. To request an ETR please email [Sheila Acosta](#) via the encrypted email process with the following information:

- Student Name
- eJAS ID Number
- Type of PR Support Needed
- Amount of PR Support Requested
- Time Frame for PR Support (i.e. a single quarter, a year, etc.)
- Justification for Support Requested

## PeopleSoft

Awarding of BFET funds must be done through the ctcLink system using the SBCTC approved global item types for each type of award offered. Colleges are not permitted to develop and use their own item types for BFET. Placeholder item types are used for AP check, vendor, and/or other expenditures paid for on behalf of student. Placeholder item types should be set up as non-disbursable.

Note: Work-Based Learning item types are not available to colleges unless the college has received approval for Work-Based Learning from DSHS.

Item Type	Descr	Refund Item Type	Refund Descr	Placeholder Item Type	Placeholder Description
91200000400	BFET Tuition	None	None	None	
91200000410	BFET Books	912000002410	BFET Books Rf	912000001410	BFET Books Placeholder
91200000420	BFET Equipment	912000002420	BFET Equipment Rf	912000001420	BFET Equipment Placeholder

91200000430	BFET Transportation	912000002430	BFET Transportation Rf	912000001430	BFET Transportation PH
91200000440	BFET Child Care	912000002440	BFET Child Care Rf	912000001440	BFET Childcare Placeholder
91200000443	BFET Digital Supports	912000002443	BFET Digital Supports Rf	912000001443	BFET Digital Supports ND
91200000446	BFET Phone & Internet	912000002446	BFET Phone & Internet Rf	912000001446	BFET Phone & Internet ND
91200000470	BFET Testing	912000002470	BFET Testing Rf	912000001470	BFET Testing Placeholder
91200000480	BFET Housing	None	None	912000001480	BFET Housing Placeholder
91200000490	BFET Clothing	912000002490	BFET Clothing Rf	912000001490	BFET Clothing Placeholder
91200000497	BFET Vision/Dental	912000002497	BFET Vision/Dental Rf	912000001497	BFET Vision/Dental Placeholder
91200000498	BFET Personal Hygiene	912000002498	BFET Personal Hygiene Rf	912000001498	BFET Personal Hygiene Placeholder
91200000449	BFET WBL Books	None	None	912000001449	BFET WBL Books ND
91200000454	BFET WBL Childcare	None	None	912000001454	BFET WBL Childcare ND
91200000457	BFET WBL Clothing	None	None	912000001457	BFET WBL Clothing ND
91200000462	BFET WBL Digital Supports	None	None	912000001462	BFET WBL Digital Supports ND
91200000465	BFET WBL Equipment	None	None	912000001465	BFET WBL Equipment ND
91200000468	BFET WBL Housing	None	None	912000001468	BFET WBL Housing ND
91200000475	BFET WBL Medical	None	None	912000001475	BFET WBL Medical ND
91200000478	BFET WBL Personal Hygiene	None	None	912000001478	BFET WBL Personal Hygiene ND
91200000483	BFET WBL Phone & Internet	None	None	912000001483	BFET WBL Phone & Internet ND
91200000486	BFET WBL Salaries	None	None	912000001486	BFET WBL Salaries ND
91200000489	BFET WBL Testing	None	None	912000001489	BFET WBL Testing ND
91200000493	BFET WBL Transportation	None	None	912000001493	BFET WBL Transportation ND

### How to Request or Update GITS:

To request a global item type created for BFET or update a global item type for your college, please open a ticket under the following: SolarWinds request type: ctcLink Support - Campus Solutions - Student Financials - Item Types.

## Forms

The SBCTC strongly encourages BFET programs to utilize the DSHS forms. All DSHS forms are located on the [DSHS website](#). All BFET program forms are available on the BFET website under the Provider Resources section.

You must receive written permission to use an alternative form for the following:

- **Substitution for the BFETDSHS Individual Employment Plan (IEP)** - an alternative IEP must contain at minimum the following:
  - Individual Employment Plan or IEP in the Title
  - Career/Employment Goals
  - Qualifications
  - Transferable Skills
  - Job-Related Assets
  - Barriers to Employment
  - Referrals to Other Providers/Services
  - Other Information Related to Employment and Training
  - Date
  - Signature
- **Substitution for the Release of Information Form (DSHS 14-012)** The “Release Clause” must state verbatim:

“I, [print 's name], give permission for the Washington State Department of Social and Health Services and [print Agency's name] to use and share confidential information about me (except as limited below) as necessary for Employment and Training (E&T) activities as required by the Basic Food E&T (BFET) program. This consent is valid for a maximum of three years from the date signed, unless I withdraw or change my consent in writing.

This consent DOES NOT permit sharing of sensitive information about my mental health, chemical dependency, HIV/AIDS and STD test results, diagnosis or treatment.

I understand that I must fill out a separately approved consent form if I am under 18 years of age, I want to further limit information shared about me, someone else is representing me in this matter, or I want to allow sharing of sensitive information about my mental health, chemical dependency, HIV/AIDS and STD test results, diagnosis or treatment.”

- **Substitution for the SBCTC BFET Referral Form (DSHS 10-501)**
  - Must include all items on the actual DSHS 10-501 form.
- **Substitution for the BFET Participant Reimbursement Form (DSHS 07-103)**
  - See Appendix A: Minimum Requirements on a Participant Reimbursement form document
    - If you are not using the internal bookstore policy you MUST use Appendix A for minimum requirements on your Participant Reimbursement form

If you are considering using an alternative form, it is required that you submit your form with your program application in OGMS. Please note that all alternate forms must, at minimum, contain the exact same elements of the DSHS form you are seeking approval for.

Alternative forms must be reapproved at the start of every Federal Fiscal Year (FFY), submitted with your program application in OGMS. The SBCTC will give final approvals in OGMS for alternate forms submitted. If no forms are submitted it will be assumed you are using the DSHS forms.

Additionally, if you make changes to an alternate form that has already received annual approval, you will need to submit the form revisions to [Sheila Acosta](#) for approval prior to use.

## BFET Participation Reporting

Each college must comply with requirements for documenting, reporting, and verifying participation in BFET activities using the eJAS system as outlined in the DSHS Provider Handbook and SBCTC Program and Fiscal Guidelines. Please note that SBCTC requires additional notes and/or specific elements above what is required by DSHS.

Participation notes must be entered for each month and be of quality. Please see the below sections for information on what is considered a quality note.

## Radio Button

Monthly progress notes can be tracked by using the radio button on the contractor caseload screen. This communicates which participants have monthly notes entered and which ones are still lacking a progress note for the month.

Note: Confidential information – such as medical information, domestic violence, mental health, disability, and chemical dependency treatment – should not be detailed in the progress notes. When documenting confidential information, refer to them as “confidential barrier” or “confidential issue.”

## Making Effective Case Notes in eJAS

Well documented, concise progress notes tell the story of BFET participation from initial enrollment to final outcome. Effective progress notes allow BFET partners to easily track participant’s goals, barriers and activities leading toward employment. Student participation in BFET must be monitored and documented in eJAS at least once a month. CTCs are the educational case managers for the participant. Notes need to include information that allows SBCTC to ensure that proper educational programs and hours are assigned. There must be a note documented in eJAS each month a client is on your caseload.

There are four types of progress notes: (1) Initial Note, (2) Monthly Progress Note, (4) Beginning of New Quarter Note and (3) Closing Progress Note:

## Initial Note

The initial note is the first note that occurs at the time of enrollment. This note is important in telling the story of why the students is participating in BFET. In the initial month of participation, the note would address the following:

- Date of BFET intake, assessment, and IEP development.
- Employment goal and BFET activities that will help the client obtain this goal.
  - What is the intended degree or certificate and how long will it take to complete the program (anticipated graduation date)?
- Are there barriers that might slow down progress?
- Component type/s and hours.
  - How many credits are they taking? How many class hours? Homework hours and study hours make up the total component hours.
- Other relevant factors that would help DSHS or SBCTC understand what is happening with this client.

Examples of initial case note:

Peter is enrolled in Fall Quarter at Hero College which runs from 9/27/22-12/15/22. His IEP and application were signed and dated on 9/18/22. His educational goal is a certificate in welding, which takes 6 quarters, his anticipated graduation date is Dec 2025. His career goal is to be a union welder. He will have a BG component of 40; 10 credits which consists of 10 hours of class and 20 hours of homework (HW)/lab time and 10 hours of HW time. Barriers listed on his IEP were transportation and tools. We discussed how to access supports for these items.

## Monthly Progress Note

Descriptive student progress notes must be input into eJAS at least monthly or when a student's circumstances change. DSHS indicates that it is best if all notes have been entered before the end of the third (3rd) week of the month.

Ongoing progress notes detail the participant's monthly activities and address the following elements, if applicable:

- Student's progress in the BFET activity.
- Is the participant on track with the education plan, meeting the required number of job search contacts, completing resume/practice interviews, or attending job training programs, etc.?
- Did they report employment? Did they drop classes?
  - If so did their component hours change? If so what is the new component hours and class/homework/study hour breakdown. Any changes in employment/education plan?
- How will this affect the anticipated completion date?
- Reason for delay in progress:
  - If progress is slower than expected or if a component must be extended past the time limit (for example, more than 270 days for BG, the progress note should explain why progress is slower than anticipated and update the new expected completion date.
- If unable to make contact, document loss of contact and unable to assess progress:
  - Explain what attempts were made, if reminders were sent to the student, and what will be the next step if the client does not respond.

Examples of Monthly Progress Note:

Mark completed his check-in for May; he is requesting assistance with tuition, fees, books, and tools required for summer quarter. College BFET staff has been assisting Mark with determining what resources might be available for these expenses.

Alexis completed her monthly check-in and reported her classes are going well. She should be finished with her training at the end of June. Alexis has already submitted a graduation application and is not requesting any additional resources at this time.

Marlene came in to update resume; she also completed a mock job interview and received positive feedback for her efforts.

Jerry came in to report he has two interviews scheduled for next week; he was unable to complete any job applications last week due to illness.

No progress report for May; sent email reminder of requirement to check in with BFET program every month.

## Beginning of New Quarter Note

This note happens at the beginning of a new quarter for a continuing student. It can be counted as the monthly progress note. This note is important in telling the story of why the student is participating in BFET and helps to serve as an overall view of progression.

- Component type/s and hours.
  - How many credits, class hours, homework hours and study hours make up the total component hours.
- Are there barriers that might slow down progress?
- Did the IEP or educational plan change?
- Did they switch educational programs?
- Did they start a job?
- Other relevant factors that would help DSHS or SBCTC understand what is happening with this student.

Examples of beginning quarter case note:

Kathi completed Fall quarter with satisfactory academic progress. Kathi is continuing her studies in Accounting. For Winter quarter FY25 she will be participating in 15 credits, 15 hours of class time, and 25 hours of HW time. Her BG 40 component will be extended. Nothing has changed on her IEP and she is on track to complete her degree as scheduled. She mentioned transportation as a barrier, so we discussed how to access support to receive an Orca card. No other barriers were mentioned.

Greg had a troubled quarter. He passed Winter quarter, however; he has to retake a math class. He is enrolled in Spring quarter for 15 credits. He is still on track to complete his Welding degree in Summer quarter. He will be taking 15 credits instead of 10 credits. His academic plan has been updated. For Spring quarter Greg is participating in 15 hours of class time, he will have 20 hours of homework time, and 5 hours of math tutoring for a total of 40 hours per week. Extending the BG 40 component. IEP was reviewed and no updates were needed. Greg will need help with books this quarter. No additional barriers at this time.

## Closing Note

When BFET participation has ended, for whatever reason, a final closing note should be entered:

- Documenting the outcome.
- Explain why the student left BFET. Was a degree or certificate earned? Did the student obtain employment?
- Components must be closed if the student has not engaged in the BFET activity or contacted BFET staff for 60 consecutive days.

## Process for Closing Components

- Identify the closure code that best fits the reason for closure. Please refer to the DSHS Provider Handbook on component closures codes.
- Enter the actual end date and click "update". The actual end date cannot be later than the scheduled end date.
- Enter case note for the closure (see above).



- If the student is no longer on your caseload, you will need to go through the historical report in eJAS to access their client file and make a case note.

Examples of closing notes:

Jennifer will graduate with Business Technology degree this month and will be exited from BFET at the end of the quarter.

Abe reports he has been hired full-time at Boeing and will no longer need BFET services. Closed BG component as of 6/15/23, reason EE (Entered Employment).

Calvin has not checked in for two successive months; he has not been participating in BFET so closing BG component 5/15/23 due to loss of contact.

## Monthly eJAS Case Note Audits

Providers must be within the 5% allowable variance each month.

Through the following procedures, together DSHS BFET Ops Team and the SBCTC will provide better technical assistance to the colleges and ensure policy requirements are met.

- Ops staff will review case note audit results with the college and report results to SBCTC monthly.
- Upon receiving monthly audit reports, the SBCTC will connect with individual colleges as necessary to discuss case note audit reports.
- If a college is below the 95% accuracy threshold for two consecutive months, a plan is required to bring the college within the required case note standard. These plans will be tailored to meet the college's needs.
- The SBCTC will assist the college in creating an appropriate plan, and work with DSHS BFET staff on any necessary training.
- If a college is below the 95% accuracy threshold for four consecutive months, training on case notes is mandatory. SBCTC and Ops staff will conduct this training.

These audit results and developed plans (where applicable) will be included in the SBCTC monitoring of the colleges.

## Activities, Components, and Hours of Participation

Colleges must report in eJAS the total number of hours of participation that students are expected to be engaged in weekly for each component being opened. See examples of the initial case note and quarterly case notes above and below.

The hours reported for each component each quarter should include seat/class time, homework time, and time spent in any other required activities that are directly related to the BFET training program. Up to an additional 10 hours per week of study time can be included if the student requests additional study time, tutoring etc. with a total of 40 hours max allowable.

Colleges have flexibility in determining the amount of homework hours needed for each hour of class time. In some cases, the program the student is enrolled in requires a higher level of homework than others. The SBCTC general guidance is students can expect at least 2 hours of homework for every one hour of class time.

Colleges can add study time and time spent in additional activities that are directly connected to a training program. Colleges will specify in eJAS when students are required to participate in additional activities that are directly connected to their training program. Training hours and any other additional required activities

should also be described in the students' Individual Employability Plans (IEP). This will allow the additional hours to be added to the number of classroom instruction hours.

Example: Julie is in the Welding Program and enrolled in Fall quarter for 15 credits. She has 5 hours of seat/class time for each of her 3 classes, she also has 5 hours per week of additional study time with a tutor. The following is an appropriate breakdown of the component and hours for eJAS case notes.

Julie is participating in the Welding Program and enrolled for 15 credits in fall quarter. 15 hours of class time, 15 hours of homework time, and 5 hours of additional study/tutor time per week for a total of 35 hours. Component open for BG-35.

Travel time should not be included in the hours of the component being requested. If documenting a childcare case note, you should include the travel time the student is requesting in the case notes.

Colleges must document participation time in approved educational activities in eJAS case notes as follows:

- **Vocational Education (BG)** - Document the scheduled class time per week, including all other required activities associated with the class or educational activity such as required group work/meetings, internship activities, laboratory time, and cooperative learning experiences as described in a class syllabus, contract, or curriculum guide. BG activity may include:
  - Certificate and Two-Year Career and Technical Education (not new but defined) – Training provided by the community and technical colleges as part of a program of career and technical education (as defined in section 3 of the Carl D. Perkins Act of 2006). Per the Perkins Act requirements, these training programs are directly connected to business partners through advisory committees, are vetted through a program approval process and provide credentials and skills in alignment with industry needs.
  - Two-Year Non-Career and Technical Education Degree Programs – Training programs provided by the community and technical colleges not categorized as professional or technical degree programs under the Perkins Act that are credit and credential-bearing. Although these programs allow the opportunity to transfer, they provide relevant skills acquisition to directly enter the workforce. \*The Associate of Arts Direct Transfer Agreement (AA-DTA) is not an eligible program.
  - Apprenticeship – Related Supplemental Instruction (RSI) provided through the community and technical colleges as part of a state registered apprenticeship program. The RSI must be credit-bearing.
  - Pre-apprenticeship – Pre-apprenticeship training provided through the community and technical colleges. The training program must be directly connected to a registered apprenticeship program. The training is not required to be credit bearing.
  - Entrepreneurship Preparation – Training provided by the community and technical colleges to prepare an individual to start a business. The training is not required to be credit-bearing.
  - Customized and Contract Training – Training provided by the community and technical colleges in response to business and industry needs. Training may include industry-recognized credentials (i.e. Flagger Certification, OSHA, etc.) or must be directly connected to a business or industry. The training is not required to be credit-bearing.
  - Work-Based Learning/Internship – Work-Based Learning/Internship required for completion of a credential or degree in an approved activity provided by a community or technical college. This includes Career Launch activities requiring paid work-based learning activities as part of Career Connect Washington.
- **Basic Education, HSE, or Basic Studies (BB)** - Education provided to participants to raise their overall employability. BB activity may include:

- Education in basic computer skills,
- Literacy or math training,
- High School Equivalency (formerly GED),
- Basic Education for Adults (BEaA), and/or

BB can be opened for a maximum of 120 days, with a total of up to 365 consecutive days (through extensions) without our further review.

- **English Language Acquisition (EN)** - Education that provides participants with instruction in English Language Acquisition (ELA, formerly known as ESL) any level of ESL that leads to competence in reading, writing, speaking and comprehension of the English language that leads to Attainment of a secondary school diploma or its recognized equivalent
  - Transition to postsecondary education and training
  - Employment
- **Integrated Education and Training (IT)**- Education that combines vocational training and Basic Education and/or ELA that provides concurrent and contextual activities for a specific occupation for the purpose of educational and career advancement.
- **Job Search (BK)** - Assistance provided to participants to secure employment. This may include access to job listings, email, fax, telephone, or assistance in preparing applications and resumes for specific jobs. The participant must make six employer contacts per month. You can open the JS component for a maximum of 90 days with a total of up to 270 consecutive days without further review. You cannot extend JS past 90 days. You must close the JS after 90 days and open a new JS if the client will participate in JS again. JS components cannot start with a future date.
- **Job Search Training (BL)** - Education and assistance provided to participants to secure employment. This may include education in a career setting, assistance in preparing application, resume writing, interview skills, and general computer instruction related to seeking employment. Though BFET cannot fund paid and subsidized work, unpaid internships and unpaid Work Experience (WEX) may fall under JT. You can open JT for a maximum of 90 days with a total of up to 270 consecutive days (through extensions) without further review.
- **Job Retention Services (BR)** - Assistance and support provided to employed participants to achieve satisfactory job performance and increase earnings over time, to include counseling, coaching, case management and participant reimbursement. The participant is eligible if they are exiting the BFET program due to employment, have no other components open and have participated in non-BR BFET activities in the last 90 days.

Component dates can cover the gaps between academic quarters. The BB, BG, EN, or IT component dates can start the first day of the quarter break through to the day before the start of the next quarter, as long as it does not exceed 150 days. For example, a BB component may start the day after Fall quarter ends through the Winter quarter to the day before the start of the Spring quarter.

## BFET Referral & BFET Provider Determination

BFET Providers will receive a referral in eJAS by way of an eMessage. Simultaneously, a BI component (also known as a referral) will be available on the BFET Contractor Caseload screen. Providers are required to contact the client within 7 calendar days to discuss needs, skills, and activities to determine if the client is a suitable fit for the BFET program. Providers will accept or reject the referral based on their discussions with the client and once a decision has been determined - rejected or accepted – and the following steps have been completed, the BI component will close.

- BFET staff will need to reject the client in the Contractor Caseload screen if the client is not suitable for the BFET program or the client cannot be contacted within seven calendar days.
- BFET staff who deem clients to be a suitable fit for the BFET program will need to accept the client in the Contractor Caseload screen by following the DSHS Provider Handbook review process.

Providers may request a 30-day pause in receiving BFET referrals due to the below criteria:

- BFET Provider is meeting (unduplicated new clients) Performance Goals and expenditures based on BFET contract.
- BFET Provider is considered at capacity.

The request should be sent by email to the [BFET Policy Team](#) and a confirmation of pause will be sent to the provider within 72 hours. Providers will have the ability to request another 30-day pause, as needed.

## Life Skills/Strategy for Success Training (SL)

Life skills are abilities for adaptive and positive behavior that enable participants to effectively manage the demands and challenges of everyday life.

The structure of Strategies for Success (SFS) can be a mixture of in class, online, and homework; however, you cannot allocate more than 30% of the structure to online and homework formats.

SFS is a standalone open enrollment activity with a curriculum of workshops that focus on topics such as:

- Preparing for Work
- Health and Wellbeing
- Effective Communication
- Personal Strength Builders
- Community Engagement

Please note that this is optional and not a requirement. You do not have to offer Strategies for Success Training. If you choose to offer SFS, it must be a standalone activity and follow the DSHS curriculum.

DSHS has approved the use of internal SFS as long as the content of the DSHS approved curriculum is not changed more than 25%.

If you offer an internal SFS course(s), you must provide a copy of the course outline and weekly curriculum to the SBCTC BFET Program Administrator for approval prior to implementation.

## Work Based Learning

Work Based Learning (WBL) activities are defined as employment in the private for-profit sector, the non-profit sector, or the public sector where a portion of a BFET participant's wages is subsidized, or unsubsidized. WBL activities improve a participant's employability by providing structured learning opportunities in a work environment to gain skills for a specific career field. WBL activities follow a documented path of training objectives that lead to unsubsidized employment in the field. Allowable work-based learning employment activities in BFET include:

- Internships
- Pre-Apprenticeships
- Apprenticeships

- On-The-Job Training

The above types of WBL can be either subsidized or unsubsidized and are to be funded with BFET funds ONLY.

Colleges must have prior approval from SBCTC and DSHS before they can offer and support WBL in BFET.

## Subsidized Work Based Learning (SWBL)

Requirements:

In accordance with 7CFR 273.7§ (2)(iv) and 7 CFR 273.7§ (2)(iv)(A)(2) SWBL activities must:

- Provide structured learning opportunities to improve a participant's employability.
- Include the opportunity for participants to gain specific skills, in their desired career field.
- Include a curriculum or written training plan, with specific training objectives.
- Follow a documented training path with the goal of entering unsubsidized employment at the end of the SWBL experience.

SWBL employers (BFET provider is the employer) must:

- Pay an individual a wage at least equal to the State/local minimum wage.
- Comply with all applicable labor laws.
- Not displace or replace existing employment of individuals not in BFET.
- Provide the same benefits and working conditions as non-E&T participants doing comparable work for comparable hours.

SWBL experiences cannot:

- Exceed six (6) months.
- Exceed One (1) WBL activity per participant, per calendar year.
- Constitute more than three (3) percent of the workforce for the host site. A BFET provider may request an exception to the (3) percent maximum, via a detailed email to SWBFETPolicy@dshs.wa.gov, and wait for an approval or denial in writing from DSHS BFET Policy.

SWBL activities must be designed and administered to improve the employability of E&T participants through actual work experience, training, or both, and to enable individuals trained under such programs to move promptly into regular, unsubsidized public or private employment.

All WBL activities that a BFET participant is engaged in, subsidized by BFET, or subsidized by other programs, must be entered into eJAS system. Paid positions from programs outside of BFET do not count towards the total number of contracted BFET SWBL performance goals. (See DSHS SWBL Policy for more information)

Colleges offering SWBL programs must upload their proposed Work Based Learning policy into OGMS as part of their application. This policy should contain at a minimum:

A Plan for;

- BFET Service Requirements.
- Development of BFET Agency Employer Worksite Agreement
- Development of Job Description

- Development of Worksite Agreement

Colleges must have prior approval from SBCTC and DSHS before they can offer and support SWBL in BFET.

## Student Files

An individual case file must be maintained for each BFET student. You can keep the files in paper or electronic formats or a combination of paper and electronic. For a program monitoring visit or an audit, requested individual electronic records must be provided in a paper/electronic format. The student's files must contain only their information. Student files should contain, at minimum, the following:

1. Completed, dated and signed application for the BFET program.
2. Completed and signed DSHS Consent Form (DSHS 14-012(X)-Rev. 02/2003) or Release of Information statement provided in the Appendix of the BFET Provider's Handbook.
3. An IEP developed in conjunction with the student that is signed and dated within 10 days of the student's intake. The IEP is a written plan identifying strategic, incremental steps to achieve an identified employment goal realistic to the student's strengths, interests, assets, family obligations and barriers.
  - If the IEP is completed outside of the 10 days of when the intake occurred, the IEP should be reviewed with the student. Students and staff must resign and date to indicate no changes.
  - The IEP must be updated at least annually, or when the student's circumstances change. If changes occur during the year that the IEP is valid for you may simply update the IEP form with the changes. Students and staff must resign and date the form.
  - A new IEP must be completed annually, even if there are no changes to the student's circumstance.
4. An up-to-date long-term academic plan, which identifies long-term academic goals and intermediate steps and sequences to reach these goals. Plans must be updated as circumstances change. It is the goal for all BFET students to have an up-to-date academic plan, however SBCTC is aware that colleges are transitioning to Guided Pathways and ctclink and that at times there may be a delay in acquiring academic plans and getting an updated plan in a timely manner. If an up-to-date academic plan is unavailable, alternate documentation may be used. This documentation should identify long term goals including employment goal and expected graduation date. The documentation should include what has been taken in the past and what the student is registered for in the current quarter. It should have a way to indicate whether classes were passed to show progression.

Examples of documentation that would meet this requirement:

- Academic Plan(preferred)
- The Advisement Report from ctclink (BEEdA students Grade reports can be used), with the Scope and Sequence from the Program with projected graduation date indicated (okay to hand-write)
- The sample plan in Appendix B
- Any other combination of documentation that meets the requirements in the checklist

Checklist (All elements must be present in the Academic plan to meet requirements):

- Long-term Academic goal

- Potential Graduation date
  - Shows previously taken classes (Course History from ctclick)
  - Shows currently enrolled classes
  - Indication of classes that were passed to show progression
5. Documentation of any Participant Reimbursements (PR form) issued on behalf of the student along with documentation (i.e. receipts) showing the funds were expended on approved purchases.

## Participant Reimbursement

Participant Reimbursement Tracking Policy as stated in the BFET Provider’s Handbook:

You must track all support services (participant reimbursements) using the Participant Reimbursement form, including supports you are leveraging. Records must contain:

- Copies of ticket and bus pass issuance or logs,
- Copies of receipts for all other participant reimbursements issued such as, but not limited to:
  - books,
  - supplies,
  - clothing
  - tools
  - phone minutes
  - internet
  - digital supports
- Justifications for each issuance.

## Participant Reimbursement Form in eJAS

Participant Reimbursement Process Option 1: For those who want to completely migrate to DSHS’s electronic Participant Reimbursement process in eJAS. You will not need a paper form as indicated above, however, this will still require you to print out the completed Participant Reimbursement form from eJAS. Below are the directions for this option.

- Immediately complete the Participant Reimbursement form in eJAS. Save, print and sign. Student signature is required on this printed form.
- If you are unable to complete, print, and/or obtain signature at time of initial issuance, yet you are ready to award funding for supports, you must make an immediate case note indicating the release of and amount of the Participant Reimbursement. You will then have 7 business days to complete the form in eJAS and obtain signature.

Example: You no longer have paper Participant Reimbursement forms. Jane comes in to BFET office and needs books. She has an itemized list for the cost of her required books. You determine she is eligible for BFET funding and you are going to award Jane books. While Jane is in your office you complete the Participant Reimbursement form in eJAS, print it, and get Jane’s signature.

## Participant Reimbursement Forms - Alternate

Participant Reimbursement Process Option 2: For those who want to continue using the Participant Reimbursement Form supplied by DSHS or an alternative form approved by the SBCTC Program Administrator. This option allows you to follow your previous process of using a paper form. However, instead of creating a case note in eJAS for the release of and amount of participant reimbursement, you will instead fill out the Participant Reimbursement form in eJAS. Below are directions for this option.

- You must continue tracking all support services (participant reimbursements) using the Participant Reimbursement form. The requirements for records (e.g. itemized lists, receipts, justification) remain the same.
- The Participant Reimbursement form must be completed in eJAS once the support has been issued or within 7 business days of issuance. Issuance must be defined by each college and included in your local policy and procedure manual. Issuance can be defined at time the support was received (not awarded or requested), at the time the receipt is collected, and/or at the time of reconciliation (monthly or quarterly).
- Participant Reimbursement forms, once created in eJAS, do not need to be printed and do not require a student signature since the paper form serves that purpose.

Example: Your college has defined issuance as the time when you get the receipt from the student. You have an approved alternate form, which you use for Participant Reimbursements. Jane comes into the BFET office and needs books. She gives you an itemized list for the cost of her required books. You determine she is eligible for BFET funding and you are going to award Jane books. You and Jane complete your paper Participant Reimbursement form (e.g. signature, date, amount, justification etc.). Jane picks up her books and brings you back the receipt. Now you have 7 business days to complete and save the Participant Reimbursement form in eJAS. You do not need to print out this electronic form, because you are also keeping Jane's paper form in her student folder along with other required documentation to show the purchase was for approved purposes.

## Participant Reimbursement BankMobile Policy

Effective September 1, 2024, colleges are permitted to provide direct disbursements for support services issued from BFET via their established BankMobile process. To use the BankMobile process for direct disbursement of BFET support services, colleges will need to follow the policies and processes included in this section.

## Allowable Categories

Colleges providing BFET support services (also known as Participant Reimbursements) for the following categories may choose to use their college's BankMobile process for disbursing support services to eligible BFET students.

Allowable categories for direct disbursement include:

- Transportation,
- Personal Hygiene,
- Educational/Credential Testing,
- Clothing,
- Childcare,
- Medical,
- Digital Support,
- Phone and Internet,
- Books (this category includes supplies and tools).



***Please note:*** Housing is not an allowable category for direct disbursement.

## Eligibility and Awarding

All support service expenditures must meet the criteria and maximum amount limits as delineated in the [DSHS BFET Provider Handbook](#) and the [SBCTC BFET Program and Fiscal Guidelines](#).

BFET funds must be awarded through the ctLink system using the SBCTC approved global item types for each type of award offered. This ensures awards are processed in alignment with each student's eligibility for aid, accounted for in the students' financial aid budget, and applied through the second journal sets process and attached to the BFET fund 146 general ledger. Colleges are not permitted to develop and use their own item types for BFET.

Item types may be used to pay off actual charges on a student account and/or separate refundable item types may be used to directly disburse to a student.

Please refer to the global item types table for allowable item types for disbursements.

Non-disbursable and placeholder item types will remain active. Colleges not opting to use the refundable global item types will continue to use the non-disbursable global item types. For all expenditures paid for on behalf of the student (such as housing) colleges will continue to use placeholder item types for AP check, vendor, and/or other expenditures.

Colleges are not permitted to invoice BFET for reimbursement of funds they are unable to verify as actually expended. Colleges should take great care in awarding only the amount of funds needed for each type of request when doing direct disbursement to students. Overawarding a student can result in the student owing funding back to the BFET program. Students are responsible for repayment of any misused funds.

## Textbooks & Supplies Policy – Internal Bookstore Only

Participant Reimbursement documentation for textbooks and supplies through an internal bookstore must include:

Participant Reimbursement form supplied by DSHS or an alternative form approved by the SBCTC BFET Program Administrator, which includes the following elements:

- BFET Participant Name and an identification number (SID or eJAS ID)
- Date of participant request
- Identification of requested support services (there is no limit to the options that may be listed on the form, however “Books” must be included)
- Expense amount for requested reimbursement (this is not required if the itemized receipt is attached to the actual form)
- Justification for the reimbursement
- Authorizing staff name, signature and date
- Student declaration, to include, but not limited to:
  - Liability Statement: the liability statement should reflect the requirement that the support services received cannot be misused and that a misuse of support services can result in repayment of funds. This statement or statements can tailor to meet the institution’s needs.
- Receipt requirement (optional): if your process requires the student to supply a receipt, you must include a statement identifying this.

- Student Signature

Expense Documentation: documentation of the actual expense must be kept on record and the documentation must:

- include an itemized list of purchased books/supplies for the participant
- include only information for the specific participant (not a record with multiple participants on the same documentation)
- be accessible: documentation can be attached to the participant reimbursement form in the participant's file or stored in an alternate location, including electronically.
- If documentation is not attached to the participant reimbursement form in the participant file:
- the participant reimbursement form must identify the expense amount, and;
- the documentation must be produced with the participant files requested during monitoring visits or audits

You may not directly provide funds to a student as a reimbursement for item(s) the student may have already purchased.

## College Fiscal and Program Monitoring

The SBCTC provides a comprehensive monitoring process that includes an in-depth review of fiscal and program processes, policies, and college documents. The SBCTC will send out the annual college monitoring schedule each September. Additionally, as processes change, or training needs are identified, the SBCTC may schedule webinars focused on our monitoring processes and college preparation. Training materials and webinar recordings will be saved in the Student Support Programs Canvas Community. Our goal is to meet contract obligations as well as be flexible for colleges wherever possible. All BFET colleges will have monitoring conducted annually.

## BFET Monitoring Outline

6-Weeks Prior To In-Person/Virtual Monitoring:

- SBCTC sends out Intent to Monitor Notification to include:
  - Program & Fiscal Questionnaire
  - Due Date

4-Weeks Prior To In-Person/Virtual Monitoring:

- SBCTC to send out Monitoring Notification in two separate emails:
  - One: Encrypted email containing student list only
  - Two: Monitoring notification email that includes:
    - Zoom link for virtual monitoring visit or request for location and parking for in-person visit
    - Due dates
    - Program & Fiscal Compliance Checklist
  - List of Program and Student Files documents for submission and review:

- Program Application (Original)
- Original IEP and all subsequent IEPs completed for the entire time the student was/is enrolled in BFET
- Original DSHS Consent Form or ROI at initial program enrollment AND current DSHS Consent Form or ROI (ROI is BFET only)
- Quarterly Class Schedule with Program of Study and Credits for current program year (Summer, Fall, Winter, Spring)
  - QCS\_SR\_CRSENR\_BY\_STUGRP
    - This will show enrollments for student group selected and should include enrollment and career/program information for the entirety of the program year
- All Participant Reimbursement forms and associated receipts issued to the student for the current fiscal year

*Compile each student's file materials and condense them into a single file for each student with file destination name as lastname, firstname. Add student files to one file folder with the file name "College Name BFET Program Documentation" and zip the program documentation file prior to upload.*

- List of Fiscal Documents for submission and review:
  - General Ledger Reports for BFET and All Funds Leveraged for BFET (WRT, Op Grant etc.), for the period selected:
  - QFS\_GL\_ACCOUNT\_ANALYSIS (General Ledger)
    - This will show all expenses for the period selected for each source the query is pulled for
  - QCS\_SF\_STDNT\_GRP\_PYMNT\_DETAIL
    - This will show by student group (SBFT) all funds that were expended on each student that was coded
  - For all employees listed in your BFET program as paid through or leveraged for BFET reimbursement, for the period selected: Payroll Reports: QHC\_PY\_PAYROLL\_BY\_DEPT
  - Time and Efforts
  - BFET Calculation Spreadsheet – any internal worksheets used to calculate and/or track the monthly invoice
  - All Participant Reimbursement forms and receipts issued for period of review scheduled
  - Full BFET Billing Workbook, including all months of the Local Certification used in the creation of the quarterly invoice

2-Weeks Prior To In-Person/Virtual Monitoring:

- Program and Student File Contents due to SBCTC College Program & Fiscal Questionnaire due to SBCTC
- Fiscal File Contents due to SBCTC

- *Upload documents using the link provided in the Monitoring Notification*

1 Week Prior To In-Person/Virtual Monitoring:

- SBCTC conducts review:
  - Program & Fiscal Questionnaire
  - Non-Disclosures
  - Mandatory Training
  - Program and Student File Contents
  - Fiscal Documentation and Billing
  - eJAS Review

Day of Monitoring:

- Virtual meeting with college staff via Zoom OR on college campus::
  - SBCTC and college (program and fiscal) staff introductions
  - Review the monitoring process and answer any initial questions
- Conduct interview following the Monitoring Checklist:
  - Ask clarifying questions on processes
  - SBCTC observations
  - Provide technical assistance and answer any questions from college staff
- Conclude Interview:
  - Review Commendations, Recommendations, and any Corrective Action Items with staff

Day After Monitoring:

- SBCTC sends a post-monitoring survey to college staff who attended the monitoring visit

2 to 4 Weeks after Monitoring:

- Monitoring Analysis Summary is sent to the college
  - Any Corrective Action Items will require a Corrective Action Plan due within 30 days of receipt of the Monitoring Analysis Summary

60-90 Days after Monitoring:

- SBCTC schedules follow-ups for any Corrective Action Plan

# Appendix A: Minimum Requirements on a Participant Reimbursement Form

Type	Data Field	Needed to Identify
Form Title	Participant Reimbursement Form	Type of Form
Identifier Information	College Name	College Issuing Participant Reimbursement
	Student Name	BFET Participant Receiving Support (Participant Reimbursement)
	eJAS ID	
Participant Reimbursements	Type of Participant Reimbursement & Amount (for Fuel/Orca Cards: Card Number, for Bus Pass: Frequency (i.e. Monthly, Quarterly, etc.)	Support (Participant Reimbursement) being Issued & Amount of the Issued Support. Must Be Individually Listed
Reasonable and Necessary	Justification	Reason Each Support (Participant Reimbursement) is Needed and How It Will Help Them Maintain in BFET Activity
Certifying Information	Certification Statement	Formal Statement Attesting The Following:  Issuance of Support Was Received No Other Entity Has Provided The Same Supports in The Same Month The Support Can Only Be Used for Intended Purposes Disqualification for Misuse of Funds Intent to Return Receipts  (i.e. Client Declaration on DSHS Participant Reimbursement Form)
	Student Signature	
	Staff Signature & Printed Name	Attesting Approval of Participant Reimbursements Issued
	Date	Date Participant Reimbursement was Received

# Appendix B: Academic Plan Sample

BFET Education/Employment Plan

Name:

Student ID:

Date:

Program of Study:

Employment Goal:

Expected Graduation Date:

SUMMER		FALL 2022		WINTER 2023		SPRING 2023	
Quarter #		Quarter #		Quarter #		Quarter #	
Course	Done	Course	Done	Course	Done	Course	Done

SUMMER 2023		FALL 2023		WINTER 2024		SPRING 2024	
Quarter #		Quarter #		Quarter #		Quarter #	
Course	Done	Course	Done	Course	Done	Course	Done

SUMMER 2024 <small>Click here to enter text.</small>		FALL 2024 <small>Click here to enter text.</small>		WINTER 2025 <small>Click here to enter text.</small>		SPRING 2025 <small>Click here to enter text.</small>	
Quarter #		Quarter #		Quarter #		Quarter #	
Course	Done	Course	Done	Course	Done	Course	Done

Created by:

Date:

Notes:

# Appendix C: How to Calculate FTE & FTEF

## Why Are Accurate FTE and FTEF Calculations Necessary?

Grant or program 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 dollar amounts entered in the salary/wages and benefits budget boxes.

## What are 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.

## Examples 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 .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 is calculated by dividing \$80,000 by \$160,000. 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: \$15,000 Benefits Budget: \$3000

Narrative Description:

PT Program Assistant: .30FTE = \$15,000 salary and \$3,000 benefits. Provides CTE data entry support. The above seems reasonable for a part-time program assistant providing data entry support.

### Unacceptable Budget Narrative:

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

Narrative Description: Part-time program assistant to provide data entry 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's 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: Program Assistant: \$1,200 Wages for approx. 60 hrs. at \$20/hr., and Benefits \$250. Provides data entry support.

SBCTC can determine that dollar amount is reasonable and accurate.



# Appendix D: Data Security Requirements

## BFET Contract – Attachment A: requirements for SBCTC Subcontractors and Sub grantees

### Definitions

The words and phrases listed below, as used in this Exhibit, shall each have the following definitions:

1. “AES” means the [Advanced Encryption Standard](#), a specification of Federal Information Processing Standards Publications for the encryption of electronic data issued by the National Institute of Standards and Technology.
2. “Authorized Users(s)” means an individual or individuals with a business need to access DSHS Confidential Information, and who has or have been authorized to do so.
3. “Business Associate Agreement” means an agreement between DSHS and a contractor who is receiving Data covered under the Privacy and Security Rules of the Health Insurance Portability and Accountability Act of 1996. The agreement establishes permitted and required uses and disclosures of protected health information (PHI) in accordance with HIPAA requirements and provides obligations for business associates to safeguard the information.
4. “Category 4 Data” is data that is confidential and requires special handling due to statutes or regulations that require especially strict protection of the data and from which especially serious consequences may arise in the event of any compromise of such data. Data classified as Category 4 includes but is not limited to data protected by: the Health Insurance Portability and Accountability Act (HIPAA), Pub. L. 104-191 as amended by the Health Information Technology for Economic and Clinical Health Act of 2009 (HITECH), 45 CFR Parts 160 and 164; the Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. §1232g; 34 CFR Part 99; [Internal Revenue Service Publication 1075](#); Substance Abuse and Mental Health Services Administration regulations on Confidentiality of Alcohol and Drug Abuse Patient Records, 42 CFR Part 2; and/or Criminal Justice Information Services, 28 CFR Part 20.
5. “Cloud” means data storage on servers hosted by an entity other than the Contractor and on a network outside the control of the Contractor. Physical storage of data in the cloud typically spans multiple servers and often multiple locations. Cloud storage can be divided between consumer grade storage for personal files and enterprise grade for companies and governmental entities. Examples of consumer grade storage would include iTunes, Dropbox, Box.com, and many other entities. Enterprise cloud vendors include Microsoft Azure, Amazon Web Services, and Rackspace.
6. “Encrypt” means to encode Confidential Information into a format that can only be read by those possessing a “key”; a password, digital certificate or other mechanism available only to authorized users. Encryption must use a key length of at least 256 bits for symmetric keys, or 2048 bits for asymmetric keys. When a symmetric key is used, the Advanced Encryption Standard (AES) must be used if available.
7. “FedRAMP” means the [Federal Risk and Authorization Management Program](#), which is an assessment and authorization process that federal government agencies have been directed to use to ensure security is in place when accessing Cloud computing products and services.
8. “Hardened Password” means a string of at least eight characters containing at least three of the following four character classes: Uppercase alphabetic, lowercase alphabetic, numeral, and special characters such as an asterisk, ampersand, or exclamation point.
9. “Mobile Device” means a computing device, typically smaller than a notebook, which runs a mobile operating system, such as iOS, Android, or Windows Phone. Mobile Devices include smart phones, most tablets, and other form factors.

10. “Multi-factor Authentication” means controlling access to computers and other IT resources by requiring two or more pieces of evidence that the user is who they claim to be. These pieces of evidence consist of something the user knows, such as a password or PIN; something the user has such as a key card, smart card, or physical token; and something the user is, a biometric identifier such as a fingerprint, facial scan, or retinal scan. “PIN” means a personal identification number, a series of numbers which act as a password for a device. Since PINs are typically only four to six characters, PINs are usually used in conjunction with another factor of authentication, such as a fingerprint.
11. “Portable Device” means any computing device with a small form factor, designed to be transported from place to place. Portable devices are primarily battery powered devices with base computing resources in the form of a processor, memory, storage, and network access. Examples include, but are not limited to, mobile phones, tablets, and laptops. Mobile Device is a subset of Portable Device.
12. “Portable Media” means any machine readable media that may routinely be stored or moved independently of computing devices. Examples include magnetic tapes, optical discs (CDs or DVDs), flash memory (thumb drive) devices, external hard drives, and internal hard drives that have been removed from a computing device.
13. “Secure Area” means an area to which only authorized representatives of the entity possessing the Confidential Information have access, and access is controlled through use of a key, card key, combination lock, or comparable mechanism. Secure Areas may include buildings, rooms or locked storage containers (such as a filing cabinet or desk drawer) within a room, as long as access to the Confidential Information is not available to unauthorized personnel. In otherwise Secure Areas, such as an office with restricted access, the Data must be secured in such a way as to prevent access by non-authorized staff such as janitorial or facility security staff, when authorized Contractor staff are not present to ensure that non-authorized staff cannot access it.
14. “Trusted Network” means a network operated and maintained by the Contractor, which includes security controls sufficient to protect DSHS Data on that network. Controls would include a firewall between any other networks, access control lists on networking devices such as routers and switches, and other such mechanisms which protect the confidentiality, integrity, and availability of the Data.
15. “Unique User ID” means a string of characters that identifies a specific user and which, in conjunction with a password, passphrase or other mechanism, authenticates a user to an information system.

## Authority

The security requirements described in this document reflect the applicable requirements of [Standard 141.10](#) of the Office of the Chief Information Officer for the state of Washington, and of the DSHS Information Security Policy and Standards Manual. Reference material related to these requirements can be found [here](#), which is a site developed by the DSHS Information Security Office and hosted by DSHS Central Contracts and Legal Services.

## Administrative Controls

The Contractor must have the following controls in place:

1. A documented security policy governing the secure use of its computer network and systems, and which defines sanctions that may be applied to Contractor staff for violating that policy.
2. If the Data shared under this agreement is classified as Category 4, the Contractor must be aware of and compliant with the applicable legal or regulatory requirements for that Category 4 Data.
3. If Confidential Information shared under this agreement is classified as Category 4, the Contractor must have a documented risk assessment for the system(s) housing the Category 4 Data.

## Authorization, Authentication, and Access

In order to ensure that access to the Data is limited to authorized staff, the Contractor must:

1. Have documented policies and procedures governing access to systems with the shared Data.
2. Restrict access through administrative, physical, and technical controls to authorized staff.
3. Ensure that user accounts are unique and that any given user account logon ID and password combination is known only to the one employee to whom that account is assigned. For purposes of non-repudiation, it must always be possible to determine which employee performed a given action on a system housing the Data based solely on the logon ID used to perform the action.
4. Ensure that only authorized users are capable of accessing the Data.
5. Ensure that an employee's access to the Data is removed immediately:
  - a. Upon suspected compromise of the user credentials.
  - b. When their employment, or the contract under which the Data is made available to them, is terminated.
  - c. When they no longer need access to the Data to fulfill the requirements of the contract.
6. Have a process to periodically review and verify that only authorized users have access to systems containing DSHS Confidential Information.
7. When accessing the Data from within the Contractor's network (the Data stays within the Contractor's network at all times), enforce password and logon requirements for users within the Contractor's network, including:
  - a. A minimum length of 8 characters, and containing at least three of the following character classes: uppercase letters, lowercase letters, numerals, and special characters such as an asterisk, ampersand, or exclamation point.
  - b. That a password does not contain a user's name, logon ID, or any form of their full name.
  - c. That a password does not consist of a single dictionary word. A password may be formed as a passphrase which consists of multiple dictionary words.
  - d. That passwords are significantly different from the previous four passwords. Passwords that increment by simply adding a number are not considered significantly different.
8. When accessing Confidential Information from an external location (the Data will traverse the Internet or otherwise travel outside the Contractor's network), mitigate risk and enforce password and logon requirements for users by employing measures including:
  - a. Ensuring mitigations applied to the system don't allow end-user modification.
  - b. Not allowing the use of dial-up connections.
  - c. Using industry standard protocols and solutions for remote access. Examples would include RADIUS and Citrix.
  - d. Encrypting all remote access traffic from the external workstation to Trusted Network or to a component within the Trusted Network. The traffic must be encrypted at all times while traversing any network, including the Internet, which is not a Trusted Network.

- e. Ensuring that the remote access system prompts for re-authentication or performs automated session termination after no more than 30 minutes of inactivity.
  - f. Ensuring use of Multi-factor Authentication to connect from the external end point to the internal end point.
9. Passwords or PIN codes may meet a lesser standard if used in conjunction with another authentication mechanism, such as a biometric (fingerprint, face recognition, iris scan) or token (software, hardware, smart card, etc.) in that case:
- a. The PIN or password must be at least 5 letters or numbers when used in conjunction with at least one other authentication factor
  - b. Must not be comprised of all the same letter or number (11111, 22222, aaaaa, would not be acceptable)
  - c. Must not contain a “run” of three or more consecutive numbers (12398, 98743 would not be acceptable)
10. If the contract specifically allows for the storage of Confidential Information on a MobileDevice, passcodes used on the device must:
- a. Be a minimum of six alphanumeric characters.
  - b. Contain at least three unique character classes (upper case, lower case, letter, number).
  - c. Not contain more than a three consecutive character run. Passcodes consisting of 12345, or abcd12 would not be acceptable.
11. Render the device unusable after a maximum of 10 failed logon attempts.

## Protection of Data

The Contractor agrees to store Data on one or more of the following media and protect the Data as described:

### Hard disk drives

For Data stored on local workstation hard disks, access to the Data will be restricted to Authorized User(s) by requiring logon to the local workstation using a Unique User ID and Hardened Password or other authentication mechanisms which provide equal or greater security, such as biometrics or smart cards.

### Network server disks

For Data stored on hard disks mounted on network servers and made available through shared folders, access to the Data will be restricted to Authorized Usersthrough the use of access control lists which will grant access only after the Authorized User has authenticated to the network using a Unique User ID and Hardened Password or other authentication mechanisms which provide equal or greater security, such as biometrics or smart cards. Data on disks mounted to such servers must be located in an area which is accessible only to authorized personnel, with access controlled through use of a key, card key, combination lock, or comparable mechanism.

For DSHS Confidential Information stored on these disks, deleting unneeded Data is sufficient as long as the disks remain in a Secure Area and otherwise meet the requirements listed in the above paragraph. Destruction of the Data, as outlined below in Section 8 Data Disposition, may be deferred until the disks are retired, replaced, or otherwise taken out of the Secure Area.

### Optical discs (CDs or DVDs) in local workstation optical disc drives

Data provided by DSHS on optical discs which will be used in local workstation optical disc drives and which

will not be transported out of a Secure Area. When not in use for the contracted purpose, such discs must be Stored in a Secure Area. Workstations which access DSHS Data on optical discs must be located in an area which is accessible only to authorized personnel, with access controlled through use of a key, card key, combination lock, or comparable mechanism.

### **Optical discs (CDs or DVDs) in drives or jukeboxes attached to servers**

Data provided by DSHS on optical discs which will be attached to network servers and which will not be transported out of a Secure Area. Access to Data on these discs will be restricted to Authorized Users through the use of access control lists which will grant access only after the Authorized User has authenticated to the network using a Unique User ID and Hardened Password or other authentication mechanisms which provide equal or greater security, such as biometrics or smart cards. Data on discs attached to such servers must be located in an area which is accessible only to authorized personnel, with access controlled through use of a key, card key, combination lock, or comparable mechanism.

### **Paper documents**

Any paper records must be protected by storing the records in a Secure Area which is only accessible to authorized personnel. When not in use, such records must be stored in a Secure Area.

### **Remote Access**

Access to and use of the Data over the State Governmental Network (SGN) or Secure Access Washington (SAW) will be controlled by DSHS staff who will issue authentication credentials (e.g. a Unique User ID and Hardened Password) to Authorized Users on Contractor's staff. Contractor will notify DSHS staff immediately whenever an Authorized User in possession of such credentials is terminated or otherwise leaves the employ of the Contractor, and whenever an Authorized User's duties change such that the Authorized User no longer requires access to perform work for this Contract.

### **Data storage on portable devices or media**

Except where otherwise specified herein, DSHS Data shall not be stored by the Contractor on portable devices or media unless specifically authorized within the terms and conditions of the Contract. If so authorized, the Data shall be given the following protections:

1. Encrypt the Data.
2. Control access to devices with a Unique User ID and Hardened Password or stronger authentication method such as physical token or biometrics.
3. Manually lock devices whenever they are left unattended and set devices to lock automatically after a period of inactivity, if this feature is available. Maximum period of inactivity is 20 minutes.
4. Apply administrative and physical security controls to Portable Devices and Portable Media by:
  - a. Keeping them in a Secure Area when not in use,
  - b. Using check-in/check-out procedures when they are shared, and
  - c. Taking frequent inventories.

When being transported outside of a Secure Area, Portable Devices and Portable Media with DSHS Confidential Information must be under the physical control of Contractor staff with authorization to access the Data, even if the Data is encrypted.

### **Data stored for backup purposes**

1. DSHS Confidential Information may be stored on Portable Media as part of a Contractor's existing, documented backup process for business continuity or disaster recovery purposes. Such storage is

authorized until such time as that media would be reused during the course of normal backup operations. If backup media is retired while DSHS Confidential Information still exists upon it, such media will be destroyed at that time in accordance with the disposition requirements below in Section 8 *Data Disposition*.

2. Data may be stored on non-portable media (e.g. Storage Area Network drives, virtual media, etc.) as part of a Contractor's existing, documented backup process for business continuity or disaster recovery purposes. If so, such media will be protected as otherwise described in this exhibit. If this media is retired while DSHS Confidential Information still exists upon it, the data will be destroyed at that time in accordance with the disposition requirements below in Section 8 *Data Disposition*.

## Cloud storage

DSHS Confidential Information requires protections equal to or greater than those specified elsewhere within this exhibit. Cloud storage of Data is problematic as neither DSHS nor the Contractor has control of the environment in which the Data is stored. For this reason:

1. DSHS Data will not be stored in any consumer grade Cloud solution, unless all of the following conditions are met:
  - a. Contractor has written procedures in place governing use of the Cloud storage and Contractor attests in writing that all such procedures will be uniformly followed.
  - b. The Data will be Encrypted while within the Contractor network.
  - c. The Data will remain Encrypted during transmission to the Cloud.
  - d. The Data will remain Encrypted at all times while residing within the Cloud storage solution.
  - e. The Contractor will possess a decryption key for the Data, and the decryption key will be possessed only by the Contractor and/or DSHS.
  - f. The Data will not be downloaded to non-authorized systems, meaning systems that are not on either the DSHS or Contractor networks.
  - g. The Data will not be decrypted until downloaded onto a computer within the control of an Authorized User and within either the DSHS or Contractor's network.
2. Data will not be stored on an Enterprise Cloud storage solution unless either:
  - a. The Cloud storage provider is treated as any other Sub-Contractor, and agrees in writing to all of the requirements within this exhibit; or,
  - b. The Cloud storage solution used is FedRAMP certified.
3. If the Data includes protected health information covered by the Health Insurance Portability and Accountability Act (HIPAA), the Cloud provider must sign a Business Associate Agreement prior to Data being stored in their Cloud solution.

## System Protection

To prevent compromise of systems which contain DSHS Data or through which that Data passes:

1. Systems containing DSHS Data must have all security patches or hotfixes applied within 3 months of being made available.
2. The Contractor will have a method of ensuring that the requisite patches and hotfixes have been applied within the required timeframes.

3. Systems containing DSHS Data shall have an Anti-Malware application, if available, installed.
4. Anti-Malware software shall be kept up to date. The product, its anti-virus engine, and any malware database the system uses, will be no more than one update behind current.

## Data Segregation

1. DSHS Data must be segregated or otherwise distinguishable from non-DSHS data. This is to ensure that when the data is no longer needed by the Contractor, all DSHS Data can be identified for return or destruction. It also aids in determining whether DSHS Data has or may have been compromised in the event of a security breach. As such, one or more of the following methods will be used for data segregation.
  - a. DSHS Data will be kept on media (e.g. hard disk, optical disc, tape, etc.) which will contain no non-DSHS Data. And/or,
  - b. DSHS Data will be stored in a logical container on electronic media, such as a partition or folder dedicated to DSHS Data. And/or,
  - c. DSHS Data will be stored in a database which will contain no non-DSHS data. And/or,
  - d. DSHS Data will be stored within a database and will be distinguishable from non-DSHS data by the value of a specific field or fields within database records.
  - e. When stored as physical paper documents, DSHS Data will be physically segregated from non-DSHS data in a drawer, folder, or other container.
2. When it is not feasible or practical to segregate DSHS Data from non-DSHS data, then both the DSHS Data and the non-DSHS data with which it is commingled must be protected as described in this exhibit.

## Data Disposition

When the contracted work has been completed or when the Data is no longer needed, except as noted above in Section 5.b, Data shall be returned to DSHS or destroyed. Media on which Data may be stored and associated acceptable methods of destruction are as follows:

<b>Data stored on:</b>	<b>Will be destroyed by:</b>
Server or workstation hard disks, or Removable media (e.g. floppies, USB flash drives, portal hard disks) excluding optical discs	Using a “wipe” utility which will overwrite the Data at least three (3) times using either random or single character data, or  Degaussing sufficiently to ensure that the Data cannot be reconstructed, or  Physically destroying the disk
Paper documents with sensitive or Confidential Information	Recycling through a contracted firm, provided the contract with the recycler assures that the confidentiality of Data will be protected.
Paper documents containing Confidential Information requiring special handling (e.g. protected health information)	On-site shredding, pulping, or incineration

Data stored on:	Will be destroyed by:
Optical discs (e.g. CDs or DVDS)	Incineration, shredding, or completely defacing the readable surface with a coarse abrasive
Magnetic tape	Degaussing, incinerating, or crosscut shredding

**Notification of Compromise or Potential Compromise**

The compromise or potential compromise of DSHS shared Data must be reported to the DSHS Contact designated in the Contract within one (1) business day of discovery. If no DSHS Contact is designated in the Contract, then the notification must be reported to the [DSHS Privacy Officer](#). Contractor must also take actions to mitigate the risk of loss and comply with any notification or other requirements imposed by law or DSHS.

**Data shared with Subcontractors**

If DSHS Data provided under this Contract is to be shared with a subcontractor, the Contract with the subcontractor must include all of the data security provisions within this Contract and within any amendments, attachments, or exhibits within this Contract. If the Contractor cannot protect the Data as articulated within this Contract, then the contract with the sub-Contractor must be submitted to the DSHS Contact specified for this contract for review and approval.



# Appendix E: Table of Contents Guide for BFET Policy and Procedure Manual

Your BFET Program is required to have a Policy and Procedure Manual. It should include, but not be limited to, the contents below. This is provided as an example only.

## Administration

1. **Program Contacts** – Who are your contacts for the following agencies?
  - a. SBCTC Contacts
  - b. DSHS Contacts
  - c. Internal Campus Security Contacts for OGMS/OBIS access
  - d. Internal Budgeting and Invoicing Contacts
2. **BFET Internal Overview** – How is the BFET program at your institution unique?
3. **BFET Resources** – Do not need to include a copy in your manual, simply the links to where they can be found.
  - a. SBCTC BFET Program and Fiscal Guidance
  - b. DSHS BFET Provider’s Handbook
4. **Program Processes**
  - a. What is your internal procedure for completing and submitting the annual BFET application to the SBCTC?
  - b. Are the Program Contacts in your application current?
  - c. How do you use OGMS to submit your annual BFET application?
5. **System Access** – What is the internal process by which a new staff member obtains access to these systems?
  - a. OGMS/OBIS
  - b. eJAS and password reset
  - c. Knowledge of using encrypted email.
  - d. SBCTC Canvas class for Student Support Services
  - e. College Systems, ctclick if required for their responsibilities
6. **Fiscal**
  - a. Reimbursement
    - i. How do you develop your annual 50/50 budget?
      - a. General Program Administration costs, including Indirect
      - b. Tuition costs

- c. Participant Reimbursement costs
  - i. How do you develop your requests for supplemental 100% funds?
    - a. General Program Administration costs, including Indirect
    - b. Tuition costs
- b. Reutilization
  - i. Will your college choose to reutilize funds?
  - ii. What is the process for notifying the SBCTC that you will be reutilizing funds?
  - iii. How will you use your reutilized funds?
- c. How do you manage your budget to prepare for quarterly funding surveys?
- d. What is your internal procedure for preparing and submitting your quarterly billing rosters to DSHS and the SBCTC?
- e. What is your internal process for preparing and submitting your monthly invoices to the SBCTC?
  - i. Local (Match) Certification form?
  - ii. Reutilized Funds Tracking spreadsheet?
  - iii. OBIS completion and submission?
- f. What is your local Cost Allocation Method?

## **7. Records & Data Security**

- a. What is your program or institutional policy for standard maintenance of records and for following an audit?
- b. How do you maintain data security?
- c. What is your process for ensuring confidentiality of confidential student information?
- d. What is your process for completing, submitting and updating a Notice of Non-Disclosure form for each staff member?
- e. What is your internal procedure for data storage, segregation and disposition?
- f. What process would you follow to provide notification of a compromise or potential compromise of confidential student information?

## **8. Program Compliance**

- a. What is your internal procedure for determining your outreach & recruitment activities?
- b. How will you schedule and verify that all staff has received the required annual mandatory trainings?

## **9. Student Files**

- a. What is your process for ensuring student files are completely, accurately and appropriately kept?

## 10. Quarterly Report

- a. How do you track the information needed to complete the mandatory quarterly report?
- b. What is your internal process for completing and submitting the quarterly report?

## 11. Time and Effort Guidelines

- a. What is your internal procedure for accurately tracking and reporting time and effort for all employees funded in whole or in part by BFET funds?
- b. Does your time and effort reporting clearly delineate all non-federal funds being used to leverage BFET?
- c. How does your program track the annual allowable variance in time and effort reporting?

## 12. Reporting Data to SBCTC

- a. What is your internal process to ensure all BFET students are designated with the appropriate Student Group Code, SBFT?
- b. How do you verify your institution's quarterly BFET data prior to it being submitted to the SBCTC Data Warehouse?

# Student Services

## 1. Eligibility, Enrollment and Student Files

- a. What is your process to ensure a DSHS Consent Form or Release of Information statement is completed, signed and dated, prior to accessing DSHS confidential information?
- b. How do you verify and document a student's eligibility?
- c. What is your Intake Process? Does it include a completed and signed BFET/Workforce Education application?
- d. What is your process to ensure an Individual Employment Plan (IEP) is developed in conjunction with the student, signed and dated within 10 days of the student's intake, and updated annually, as well as when the student's circumstances change.
- e. How do you ensure documentation of enrollment for each student each quarter?
- f. What is your internal process for ensuring a student is informed of the classes they must take to complete their program of study and how long they might expect this to take?
- g. How do you ensure that a student's file contains only their information?

## 2. BFET Components

- a. How do you determine and document the BFET component and component hours for each student?
- b. What is your internal procedure for editing and closing components?

## 3. Participant Reimbursement

- a. What is your internal process for determining which participant reimbursement activities you will support?

- b. How does your program track and document participant reimbursement expenditures?
- c. What is your process to ensure all participant reimbursement requests by a student have the proper documentation, i.e., a DSHS Participant Reimbursement form (or SBCTC-approved alternate) along with receipts?
- d. Have you received SBCTC approval for an alternate form? If so, what is the process, when does it need to be resubmitted for approval, etc.?
- e. What is your policy addressing your actions if a student does not provide documentation verifying that participant reimbursement funds were used for the approved purpose?
- f. What is your date of disbursement? How do you ensure that your participant reimbursements are entered into eJAS 7 business days after the date of disbursement?

**4. Participation and Reporting**

- a. How do you ensure Monthly Progress Notes are input into eJAS in a timely manner?
- b. Have you provided sample eJAS Progress Notes for staff reference?
- c. What is your process for entering appropriate case notes for students needing childcare?

**5. Appendix**

- a. Examples of all current forms being used by your program

# Appendix F: Portable Digital Device Loaner Program

Portable Digital Device Loaner Program: Upon receiving written approval from SBCTC, the College may institute a Portable Digital Devices Loaner Program (“Program”) whereby the College temporarily provides a laptop, or other portable electronic device approved by SBCTC, to BFET clients for their use in completing BFET activities at locations other than the College’s main address. Prior to providing Program services or devices to BFET clients, the College shall obtain written permission from SBCTC to do so by submitting the documents set forth below for approval by SBCTC. In its sole discretion, SBCTC may request the College change or edit the items before providing approval to ensure necessary program requirements or data security measures remain in accordance with federal and state law, and DSHS policy. The College agrees to comply with all applicable changes or edits requested by SBCTC, and upon completing the changes or edits to the document or documents shall re-submit them to SBCTC for approval. The required documents are as follows:

1. **Usage Agreement:** A written usage agreement by which terms and conditions for device usage are set forth between the BFET client and the College prior to the BFET client obtaining a portable device. The usage agreement at minimum shall obligate the BFET client to adhere to the following Data Security measures:
  - a. Saving personal documents to external secured drives or cloud;
  - b. Reporting procedure for lost or stolen device;
  - c. Access and use limitations.
2. **Inventory Tracking System:** An inventory tracking system that secures, manages, accounts for and holds all Portable Digital Device Loaner Program (“Program”) devices and device accessories separate and apart from any other DSHS property or property of the College. For the purpose of this Section 1, “separate and apart” means the College in all events shall separately track and account for any devices and device accessories purchased by the College on behalf of the Program, and any Contractor property purchased for its own account.
3. **Data Security Policy:** A written Data Security Policy specific to the Program that at minimum describes and documents to SBCTC satisfaction the Data Security measures set forth below:
  - a. Data Security knowledge and understanding for Contractor staff assigned to the Program;
  - b. Single user log on;
  - c. Adequate virus protection;
  - d. User Profiles must be deleted once device is checked-in to the agency
  - e. Device encryption
4. **Equipment:**
  - a. Maximum portable digital device purchase is \$700.00 per device. If purchase amount is above \$700.00 a justification and program approval are required.
  - b. Reporting procedures for lost or stolen device and device accessories;
  - c. Device and device accessories disposal.
  - d. The portable device is released from these terms when the device is no longer usable or at the end of this contract period, whichever is sooner.



[CC BY 4.0](https://creativecommons.org/licenses/by/4.0/), unless otherwise noted.

Washington State Board for Community and Technical Colleges