BASIC FOOD EMPLOYMENT AND
TRAINING (BFET)

2020-21 GRANT GUIDELINES

Workforce Education Department
Washington State Board for Community and Technical Colleges
PO Box 42495
Olympia, WA 98504
SBCTC.edu
The Washington State Board for Community and Technical Colleges reserves the right to make changes to this document due to, but not limited to, federal, state, or local legislation or policy changes.

### Deadlines and Milestones

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Overview

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 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.

Offered through the Department of Agriculture’s Food and Nutrition Service (FNS), the Basic Food Employment and Training (BFET) program is another 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.

Applicant Guidelines

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 FFY 2020 Basic Food Employment and Training program.

How Does the Provider Apply

Complete and submit to SBCTC the DSHS BFET Budget WorkBook by the annually identified due date.

Access the 2020-21 BFET 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 FY21.

Submit completed grant applications to the SBCTC through OGMS no later than August 13, 2020 at 11:55 p.m. SBCTC staff is available for assistance until 4:00 p.m. on August 13, 2020.

Application Process

The SBCTC will review your application and provide feedback, if changes are required. After your application is approved by SBCTC BFET program staff, your BFET budget approved by the SBCTC fiscal staff and DSHS, and the state plan is approved by FNS, the SBCTC will approve your application in OGMS.

Disclaimer

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

Billing Cycle

The BFET program funding and billing process is aligned with the federal fiscal year. Funding awarded October...
1, 2020 will cover fall quarter expenses incurred after September 30, 2020, and winter quarter, spring quarter, summer quarter, and fall quarter expenses incurred prior to October 1, 2021.

Please refer to the 2020-21 BFET Fiscal Guidelines for more information.

**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 SBCTC Fiscal Guidelines and Grant Terms for instructions
  - *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.

**Tuition**

Participants may receive assistance with tuition, lab fees, and other education-related costs necessary for training connected to a BFET activity.
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 Jennifer Dellinger at jdellinger@sbctc.edu 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 $1400 per program year. Repairs must have at minimum two estimates from a licensed automobile mechanic. Estimates must itemize all repairs and costs necessary.

- **Educational/Credential Testing:** participants may 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, 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. Standard Licensing and Fees assistance is limited to a maximum amount of $65 per program year.

- **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 assistance is limited to $600 per program year. Verification of cost of clothing is required in addition to the justification. Must include an itemized receipt. May include Personal Protective Equipment (PPE).

- **Child Care:** If the participant is ineligible for childcare through the Childcare Subsidy Program (CCSP), but performs approved BFET activities, 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 Dental and Vision.

- **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.

- **Housing and Utilities:** Assistance can be provided after all other resources have been exhausted. Housing and Utilities assistance is limited to a maximum of $6,000 per program year.

- **Personal Hygiene:** Assistance may be provided to the participant to meet employer appearance standards. Personal Hygiene assistance is limited to a maximum of $600 per program year. May include Personal Protective Equipment (PPE).

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 Jennifer Dellinger at jdellinger@sbctc.edu via the Washington Secure Email Portal 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

Reimbursed and Reutilized Funds

Reimbursed funds can be used to build your BFET program, returned to the original funding source, or reutilized.

Reutilized funding is the opportunity to reuse reimbursed funds that have been reimbursed for allowable BFET activities and submit those expenditures for reimbursement. In order to participate in reutilized funding during the new 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. These funds must be tracked separately to ensure accurate accounting of all funds. Use of alternate forms is not approvable.

Funding Options:

BFET funds can be used to cover the cost of tuition, 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.

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 were used to pay costs covered by other sources of funding (work study funds in this case).

Awarding of BFET funds must be done through the colleges Financial Management System using the SBCTC approved OX FAPC codes for each type of award offered. Note: these FAPC codes do not apply to those institutions using CTC Link.

• BFET TUIT/FEES, Award Code X1, FAPC 0X1
• BFET BOOKS, Award Code X2, FAPC 0X2
• BFET TOOLS/SUP, Award Code X3, FAPC 0X3
• BFET TRANSPORT, Award Code X4, FAPC 0X4
• BFET TESTING, Award Code X5, FAPC 0X5
• BFET HOUSING, Award Code X6, FAPC 0X6
• BFET CLOTHING, Award Code X7, FAPC 0X7
• BFET UTILITIES, Award Code X8, FAPC 0X8
• BFET VIS/DENTL, Award Code X9, FAPC 0X9
• BFET CC, Award Code XG, FAPC 0XG
• BFET PERS HYG, Award Code XH, FAPC 0XH
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 clients 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.

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 Guidelines and Fiscal Guidelines documents, compliance with all DSHS policies and procedures as outlined in the BFET Provider’s Handbook is also required.

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 grant 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. A
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 (page 27 of the BFET Providers Handbook).

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

Time and Effort

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. Additional time and effort reporting information can be found in the online Time and Effort Guidelines.

Time and efforts are required to be provided for all employees paid in part or whole (including those whose salaries/benefits are leveraged) for the current FFY at the time of any audit or monitoring.

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. 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 grant 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.

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)

Participant Records and Reporting

Coding Students

Legacy

BFET students are identified through the Unusual Action code. You must first add the new Unusual Action Code to the Unusual Action Code table in SMS (SM5021). Use unusual-action value “B!”. Enter the value for the student on the Student Unusual Action screen (SM5003) including the YRQ of their enrollment in the program. The student must be coded as BFET for each quarter. This requires updating the YRQ field.

NOTE: The students will need to be coded with the Unusual Action code and the YRQ field updated each quarter they are enrolled in the BFET program.
If you have any question on the use of this code please contact Carmen McKenzie, 360-704-4369.

**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 each quarter, but will need to deactivate students once they are no longer participating in BFET. Make sure you deactivate the student in the quarter for which they should no longer be counted.

**Example**

If a student becomes eligible for BFET on 9/1/2016 and you code the student with the Student Group Code on this day, the effective date becomes 9/1/2016. 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.

If the student becomes ineligible for BFET for winter quarter, you would want to inactive 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. So for accuracy, do not make modifications for the next quarter until you are past your current quarter’s MIS run date.

**System and College Quarterly Monitoring**

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. 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.

**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 activities:

- BFET IEP
  - See DSHS Provider Handbook for min requirements
- Substitution for the Release of Information Form (DSHS 14-012)
  - See DSHS Provider Handbook for minimum requirements
- Substitution for the SBCTC BFET Referral Form (DSHS 10-501)
- 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 grant.
application in OGMS. Alternative forms must be reapproved at the start of every Federal Fiscal Year (FFY), submitted with your grant 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 Jennifer Dellinger 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 Grant Guidelines.

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.

**Monthly Progress Notes**

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.

**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 Progress 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. Client participation in BFET must be monitored and documented in eJAS at least once a month. All progress notes must state how the information was obtained, e.g., in-person contact, email, telephone, paper progress note, Canvas, etc.

There are three types of progress notes: (1) Initial Progress Note, (2) Ongoing Progress Note, and (3) Closing Progress Note:

**Initial Note**

The initial note is important in telling the story of why the client 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
  - For colleges, what is the intended degree or certificate and how long will it take to complete the program?
  - For CBO’s, how many job search contacts are expected, what type of job training is planned, etc.?
- Are there barriers that might slow down progress?
Ongoing Progress Note

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

- Client’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.?
- How progress was assessed
- If noting that the participant is making progress, how does the contractor know? Was there in person contact, a phone call, email from client, contact with instructors or verification of continued attendance and grades?
- 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 VE), 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 client, and what will be the next step if the client does not respond.

Closing Note

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

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

Process for Closing Components

- Identify 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 then the scheduled end date.
- Enter case note for the closure (see above)

Examples of Progress Notes

Initial Note

Chelsea is participating in BFET at Our Community College; she has completed her IEP and BFET orientation. She is confident in her career choice as Network Administrator and is pursuing an AAS degree in Computer
Science/Network Administration. This program is usually completed in eight quarters so she anticipates finishing the degree in Spring 2017. She was reminded to check in monthly and was given information on campus resources such as tutoring center. She is currently enrolled in 15 credits for Summer Quarter.

Completed BFET intake and assessment. Client has the following barriers: limited English and limited transferrable job skills barriers. IEP will address these barriers as follows: Client will work with case manager 5 hours a week on job search. Client will attend job readiness class and case manager will refer client to resources to address employment and further ESL classes.

**Ongoing Progress Note**

Mark checked in via Canvas 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.

Alison's instructors report she is making "satisfactory progress" in Medical Administrative Assistant classes.

Alexis stopped by 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.

Jason is very active in job search. Submitted applications at Costco, Home Depot, Lowe’s and Pacific Building Services. Also interviewed with ABM but has not heard back yet.

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.

**Closing Note**

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 fulltime at Boeing and will no longer need BFET services. Closed JS component as of 6/15/15, reason EE.

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

**Hours of Participation**

Colleges must report the total number of hours of participation that students will be engaged in weekly. The hours should include seat 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 request additional study time, tutoring etc. Training hours and any other additional required activities will be described in all Individual Employment Plans (IEP) and in Client Notes in eJAS.

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

- **Vocational Education (VE)** - 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.
- **Basic Education, HSE, or Basic Studies (BE)** - Education provided to participants to raise their overall employability. BE activity may include:
  - Education in basic computer skills,
  - Literacy or math training,
  - High School Equivalency (formerly GED),
  - Basic Education for Adults (BEdA), and/or
  - English Language Acquisition (ELA, formerly known as ESL)

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

Colleges can add study time and time spent in additional activities that are directly connected to a training program. Colleges will specify in writing 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 will be described in all Individual Employability Plans (IEP), and this will allow the additional hours to be added to the number of classroom instruction hours.

- **Job Search (JS)** - 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 (JT)** - 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 participate in non-BR BFET activities in the last 90 days.

- **Case Management (BC)** - Ongoing assistance, support coordination and advocacy provided to participants to overcome barriers to employment and remain engaged in the BFET program. This includes referrals to additional programs and services not covered by the BFET program, and one-on-one coaching. BC does not include services that are part of other BFET activities, such as, but not limited to, initial assessment, development and maintenance of the IEP, academic advising and career navigation. *Disclaimer: DSHS has not received permission from FNS to use the BC component at the time of this publication. The above component descriptions are the proposed components for FFY 2017 and are subject to FNS approval.

  - The required documentation must be in place with a timeline for implementation.
  - A copy of the participating documentation must be maintained in the student file.
  - Follow standard retention guidelines for Federal program administration. Study Time and Additional Activities
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 send to individual colleges.
- The SBCTC’s communication will congratulate colleges on meeting acceptable percentages or inquire why the college was outside of variance.
- If a college is below the 95% accuracy threshold for two consecutive months, a plan is required to bring the college within required case note standard. These plans will be tailored to meet the college’s needs.
- Ops staff will assist the college in creating an appropriate plan, and SBCTC must approve the plan.
- 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.

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, and
  - tools
- Justifications for each issuance.

Textbooks & Supplies Policy – Internal Bookstore Only

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

1. **Participant Reimbursement form** supplied by DSHS or an alternative form approved by the SBCTC WorkFirst 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)
   - 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.

2. **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

- Expense amount for requested reimbursement
- 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

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

**Participant Reimbursement Form in eJAS**

Participant Reimbursement Process: 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: 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 an 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.
- Within 7 business days of completion of the paper form, you must fill out the Participant Reimbursement form in eJAS. This replaces the previous requirement of creating a case note to accompany the paper form.
- 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: 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.). 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.

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 a fiscal audit, requested individual electronic records must be provided in a paper 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 BFET
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.

   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. Student 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. Documentation of enrollment for each quarter.
5. An up-to-date long-term academic plan, which identifies long-term academic goals and intermediate steps and sequences to reach these goals, must be updated quarterly and as circumstances change.
6. Any Participant Reimbursements issued on behalf of the student along with documentation (i.e., receipts) showing the funds were expended on approved purchases.
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 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 and 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.

ABAWD (Able Bodies Adults without Dependents)

Per WAC 388-444-0010, a Basic Food recipient is exempt from work registration, and as a result from ABAWD requirements, if they are enrolled at least half-time in an institution of higher learning. For college purposes, half-time is defined as being enrolled a minimum of six credits per quarter.

Supporting ABAWDs in BFET

ABAWDs participating in Community and Technical College (CTC) BFET programs and enrolled half-time or more, meet both student and ABAWD requirements. If an ABAWD participating in a CTC BFET program is enrolled less than half time, and therefore not meeting student requirements (WAC 388-482-0005), DSHS is responsible for determining if the ABAWD requires additional activities. If DSHS requires the ABAWD to complete additional activities, it is the ABAWD’s responsibility to find additional activities to meet their 80 hour/month work requirement and to turn in their Activity Reporting Form.

When an ABAWD is referred to a CTC BFET Program:

- BFET staff complete and submit the Reverse Referral Form. Completed Reverse Referral Forms can be submitted to DSHS by:
  - Faxing to: 1-888-388-7410, or
  - Taking it to your local Community Services Office (CSO), or
  - Mailing to:
    - DSHS CSD Customer Service Center
    - PO Box 11699
    - Tacoma WA 98411-6699
- Once enrolled into the BFET program, the initial eJAS case note should identify the following information (in addition to standard BFET case note requirements):
  - Statement the client was an ABAWD and is now a student
  - Breakdown of the total amount of hours the client is expected to participate.
- ABAWDs participating in the BFET program and enrolled at least half-time, have no obligations beyond standard BFET requirements (i.e. no additional monthly tracking or Activity Report form).
- As with any BFET student, they continue to be a student during breaks if they intend to be enrolled for the next quarter.
- If an ABAWD student drops below half-time, or does not take any summer classes, the ABAWD would not be referred back to the Navigator. It is the ABAWDs responsibility to meet their work requirement some other way and to file an Activity Report form. (Creative suggestions: Think about offering JS/LS activities during the summer, partner with a CBO that provides JS, LS or anything else that meets the work requirement guidelines.)

A student would return to ABAWD status and would need to meet work requirements if they chose to stop participating in BFET.
## Appendix A: Minimum Requirements on a Participant Reimbursement Form

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


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
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 Mobile Device, 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 User(s) 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 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 a 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 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:

<table>
<thead>
<tr>
<th>Data stored on:</th>
<th>Will be destroyed by:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Server or workstation hard disks, or</td>
<td>Using a “wipe” utility which will overwrite the Data at least three (3) times using either random or single character data, or</td>
</tr>
<tr>
<td>Removable media (e.g. floppies, USB flash drives,</td>
<td>Degaussing sufficiently to ensure that the Data cannot be reconstructed, or</td>
</tr>
<tr>
<td>portal hard disks) excluding optical discs</td>
<td>Physically destroying the disk</td>
</tr>
<tr>
<td></td>
<td>Recyling through a contracted firm, provided the contract with the recycler assures that the confidentiality of Data will be protected.</td>
</tr>
</tbody>
</table>
Data stored on: | Will be destroyed by:
---|---
Paper documents containing Confidential Information requiring special handling (e.g. protected health information) | On-site shredding, pulping, or incineration
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 C: 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 Grant Guidance
   b. SBCTC BFET Fiscal Guidelines
   c. DSHS BFET Provider’s Handbook

4. **Grant Processes**
   a. What is your internal procedure for completing and submitting the annual BFET application to the SBCTC?
   b. Are the Grant 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. WA State Secure Email Portal
   d. BFET Listserv
   e. College Systems, e.g., SMS, FMS, FAM, 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 quarterly 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 Unusual Action Code, B!, or 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?

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