BASIC FOOD, EMPLOYMENT, AND TRAINING (BFET)

2021-22 FISCAL GUIDELINES

Student Services 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

<table>
<thead>
<tr>
<th>Milestone</th>
<th>Dates (subject to change)</th>
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<tr>
<td>Projected start date of grant</td>
<td>October 1, 2021</td>
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<td>Final budget revision deadline</td>
<td>September 15, 2022</td>
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<tr>
<td>End date of grant</td>
<td>September 30, 2022</td>
</tr>
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<td>Final billing deadline</td>
<td>October 31, 2022</td>
</tr>
</tbody>
</table>

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Budget & Invoicing Guidance

Budget Guidance
The Basic Food, Employment and Training (BFET) program requires 100% up-front expenditures to receive 50% reimbursement. In your budget narrative, include a description of your 100% up-front expenditures. However, your budget should only include dollar amounts for the 50% reimbursement your college will receive.

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

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 and administration in budget narratives in the Online Grant Management System (OGMS).

Tuition
Tuition and associated fees paid for BFET-eligible students.

Participant Reimbursement
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 DSHS Participant Reimbursement form (or an SBCTC-approved alternate form) and verified by receipts.

100% Funding
This funding does not require a non-federal source, may be reimbursed at 100% from the grant, and may be used for administration of the program, tuition and fees. This category of funding may not be used for Participant Reimbursement expenditures.

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/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 grant application in OGMS.

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

- As noted above, include narrative for 100% of your expenditures but include dollar amounts for only the 50% reimbursement your college will receive.

Examples:

- BFET Coordinator, 70%
  Meets with students to develop Individual Employment plans, assists with applications for basic food, conducts quarterly meetings with BFET students

- Program Assistant, 200 hours at $16/hour
  Work directly with students to report progress, assists with BFET program orientations

- Faculty, .2 FTEF
  Provides vocational instruction to BFET students

- 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.

- Program Specialist, 15%
  BFET student coding, enter student notes into eJAS, prepares quarterly billing.

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.

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

Budget narrative format:

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

- As noted above, include narrative for 100% of your expenditures but include dollar amounts for only the 50% reimbursement your college will receive.

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 grant recipient and are subject to the “Purchased Items” terms in this document.

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

Travel
Expenditures for transportation, meals, hotel, and other expenses associated with traveling related to allowable grant activities. Reimbursement for travel costs must be within OFM travel rates and regulations which can be found in the State Administrative and Accounting Manual (SAAM), Chapter 10.90. Please note, when the grant recipient (the college) reimburses travel under this grant, the same OFM travel rates and regulations must be applied. Be sure to budget funds necessary to participate in the annual BFET training forum.

**Budget narrative format:**
- You must use the format provided in the example below when completing your grant application in OGMS.
- As noted above, include narrative for 100% of your expenditures but include dollar amounts for only the 50% reimbursement your college will receive.

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 are: 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 paid for BFET-eligible students.

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. See DSHS’s BFET Handbook and/or Participant Reimbursement Directory for more information.

Clothing
Clothing necessary for program participation (e.g., uniforms, protective clothing), job interviews, or to participate in an approved BFET activity. See DSHS’s BFET Handbook and/or Participant Reimbursement Directory for more information.

Childcare
Childcare needed for program participation only if participant is ineligible for childcare through Childcare Subsidy Program (CCSP). Participant file must include denial of CCSP eligibility.

See DSHS’s BFET Handbook and/or Participant Reimbursement Directory for more information.
**Housing**

*DSHS Category Name: Housing & Utilities*

Costs may include emergency housing assistance or utility shut off assistance after all other resources have been exhausted. See DSHS's BFET Handbook and/or Participant Reimbursement Directory for more information.

**Personal Hygiene**

Personal hygiene products and services necessary to meet potential employer's standards. See DSHS's BFET Handbook and/or Participant Reimbursement Directory for more information.

**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. 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.

See DSHS's BFET Handbook and/or Participant Reimbursement Directory for more information.

**Medical**

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

See DSHS's BFET Handbook and/or Participant Reimbursement Directory for more information.

**Transportation**

Transportation support. This may include transit tickets, bus passes, parking passes and fuel cards for participant-owned vehicles, and automobile or bike repairs. See DSHS's BFET Handbook and/or Participant Reimbursement Directory for more information.

**Indirect - General 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 the General funding line of the grant.

- **Colleges who choose to use their federally approved indirect rate** must upload a copy of their federal approval letters to their grant application in the Online Grant Management System (OGMS) prior to the start of the grant.
- **Budgeting:** Colleges may budget up to their federally approved indirect rate for those categories allowed per your approved rate, i.e., salaries only, salaries/benefits, or MTDC, budgeted to the
General funding line of the grant.

- **Invoicing:** Colleges may invoice indirect amounts up to their federally approved indirect rate based on the amounts billed for those categories allowed per your federally approved rate, i.e., salaries only, salaries/benefits, or MTDC, on the General funding line.

- **For colleges without a federally approved indirect rate, or those who choose not to use their federally approved indirect rate:**
  - **Budgeting:** Colleges may budget up to 5% for salaries budgeted to the General funding line of the grant.
  - **Invoicing:** Colleges may invoice up to 5% of the amount billed for salaries on the General funding line.

Indirect may not be budgeted or invoiced against this grant 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 monthly.

**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 grant.

- **Colleges who choose to use their federally approved indirect rate** must upload a copy of their federal approval letters to their grant application in the Online Grant Management System (OGMS) prior to the start of the grant.

  - **Budgeting:** Colleges may budget up to their federally approved indirect rate for those categories allowed per your approved rate (i.e., salaries only, salaries/benefits, or MTDC) budgeted to the General and 100% Funding lines of the grant.

  - **Invoicing:** Colleges may invoice indirect amounts up to their federally approved indirect rate based on the amounts billed for those categories allowed per your approved rate (i.e., salaries only, salaries/benefits, or MTDC) on the General and 100% Funding lines.

- **For colleges without a federally approved indirect rate, or those who choose not to use their federally approved indirect rate:**

  - **Budgeting:** Colleges may budget up to 5% for salaries budgeted to the General and 100% Funding lines of the grant.

  - **Invoicing:** Colleges may invoice up to 5% of the amount billed for salaries on the General and 100% Funding lines.

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

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 monthly.

**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. You may invoice for up to 10% more in budget cells as long as the budget line does not exceed the total budgeted.

Per the statewide agreement from Department of Social and Health Services (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 to obtain permission to move funds between those two budget lines prior to submitting a budget revision in OBIS.

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

*Final budget revision deadline: September 15, 2022*

See the OBIS user manual (available in the Resources section of OBIS) for information on how to create and submit a budget revision.

**Invoicing**

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

Reimbursement requests must be submitted via OBIS. All costs must be submitted for reimbursement in accordance with the schedule shown below.

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<tr>
<td>September 2022</td>
<td>October 31, 2022</td>
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Grant Terms & Information

General
Funds for these grants are provided to the State Board for Community and Technical Colleges (SBCTC) through the Washington State Department of Social and Health Services (DSHS) from the U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS) under **CFDA 10.561**.

Non-compliance with grant 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 grant 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 Circulars (Federal)**
2 CFR Title I, Chapter II, Parts 200, 215, 220, 225 and 230I (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 $5,000, they may be offered to another federal program at the recipient’s college at no cost. If the supplies are not needed for another federal program, they can be sold or transferred to a non-federal program. If the supplies are sold or transferred, the value must be returned to the federal agency where the funds originated. The SBCTC will assist in the return of funds. Please contact 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

Data Security
Grant recipients must adhere to the “Data Security Requirements” contained in the 2021-22 BFET Grant Assurances document in OGMS.

Grant recipients, 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 74.04.060, punishable by imprisonment of not more than one year and/or a fine not to exceed five thousand dollars. Grant recipients must notify all authorized persons, who require access to data, of the use and disclosure requirements and penalties for unauthorized use/disclosure.

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

Expenditure Accounting
All expenditures claimed for reimbursement must be documented in your fiscal records. BFET reimbursements must either offset BFET expenditures or be reinvested in allowable BFET activities. 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). Since funds originate from another state agency, SBCTC grant reimbursement must be coded to object S.

Monitoring
SBCTC may schedule monitoring visits during and after the grant period to evaluate the fiscal progress and performance of the program and provide technical assistance. The purpose of monitoring is to ensure regulatory and contractual compliance on the part of grant recipients. To ensure compliance with grant requirements and to ensure that financial records support program expenditures, SBCTC staff will schedule on-site visits.

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 grant recipient shall clearly state:
1. The dollar amount of federal funds for the project;
2. The percentage of the total cost of the project financed with federal funds; and
3. The percentage and dollar amount of the total costs of the project financed by non-governmental sources.

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

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

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

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

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

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

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

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 BFET. For example, an employee who spends time supporting co-enrolled BFET and Worker Retraining (WRT) students and is paid in whole or in part from WRT funds should have the following line on his or her time and effort report:

- **WRT (BFET)**

Note: Using the example above, if the employee is not paid 100% from WRT and/or does not spend 100% of his or her time supporting BFET students, the employee would also need other lines on his or her time and effort report. Be sure to review [time and effort guidelines](#) for complete instructions on time and effort reporting.

A time and effort report for employees paid in whole or in part from Reutilized BFET funding should contain the following line:

- **BFET Reutilized Funding**

A time and effort report for employees paid in whole or in part from BFET 100% Funding should contain the following line:

- **BFET 100% Funding**
Appendix A: How to Calculate FTE & FTEF

Why Are Accurate FTE and FTEF Calculations Necessary?
Grant expenses must be “necessary and reasonable.” You must provide some type of salary breakdown for us to determine that a budgeted cost is reasonable.

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.

Note: FTES = full-time equivalent student. Grant budget narratives should not normally include “FTES” (with a capital “S”) as grant funds cannot be paid directly for student FTES.

How Do I Calculate Percentages of FTE and FTEF?
(total amount of funds budgeted for the staff time per position type) ÷ (annual full-time salary per position) = total FTE per position to be funded from the grant

Example of Calculating FTE (staff):
$10,000 budgeted for a total of 3 part-time office assistants ÷ $25,000 annual full-time salary for an office assistant at your organization = a total of .4 FTE office assistant paid from this grant

$10,000 ÷ $25,000 = .4

Example of Calculating FTEF (faculty):
$200,000 budgeted for multiple part-time and full time faculty ÷ $60,000 annual full-time salary for faculty at your organization = 3.33 FTEF paid from this grant

$200,000 ÷ $60,000 = 3.33

More Examples & Explanations

Acceptable Budget Narrative:

Budget amount: $10,000

Narrative description: .35 FTE part-time program assistant to provide direct assistance to students

SBCTC can determine that this is a reasonable cost for the positions and work done.

$10,000 ÷ .35 FTE = $28,000 annual salary. This is very reasonable for a program assistant providing assistance to students.

Unacceptable Budget Narrative:

Budget amount: $10,000

Narrative description: Part-time staff to provide student support

Without knowing how many staff, what kind of staff, and the total percent of full-time equivalent staff (FTE) that will make up the $10,000 worth of work, SBCTC cannot determine if the cost is reasonable or not.
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.

Budget amount: $10,000

Narrative description: Program assistant to provide student support, approx. 625 hrs at $16/hr

SBCTC can determine that dollar amount is reasonable.