WORKFIRST DELIVERY AGREEMENT

2026-27 GRANT & FISCAL GUIDELINES

Workforce Education Department

Washington State Board for Community and Technical Colleges

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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

Milestone	Dates (subject to change)
Application available in OGMS	February 26, 2026
Applications due in OGMS	April 2, 2026
Grant start date	July 1, 2026
Final budget revision deadline	June 15, 2027
Projected end date of grant	June 30, 2027
Billing deadline for all expenses incurred through June 30, 2027	July 15, 2027

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Overview

Washington State began WorkFirst, the state's Temporary Assistance for Needy Families (TANF) program, in August 1997. The program provides cash grants, medical assistance, welfare-to-work services, and work supports (including subsidized childcare through the Working Connections Child Care program) to eligible TANF families. The goal of WorkFirst is to help TANF families build a pathway that can lead them out of poverty and toward economic security.

With the signing of Engrossed Second Substitute House Bill 3141 on April 1, 2010, Governor Christine Gregoire directed the WorkFirst Subcabinet to "examine how to best meet the challenges for WorkFirst families to obtain employment and achieve family self-sufficiency," and provide a report and plan to implement evidence-based best practices that are sustainable within a block grant program. The Governor challenged the WorkFirst Subcabinet to think anew and to 'reboot' WorkFirst for the 21st century.

The WorkFirst Subcabinet was comprised of the leaders of six state agencies that collaborate to administer the program:

- Department of Commerce (COMMERCE)
- Department of Children, Youth and Families (DCYF)
- Department of Social and Health Services (DSHS)
- Employment Security Department (ESD)
- Office of Financial Management (OFM)
- State Board for Community and Technical Colleges (SBCTC)

Since this time, there has been an evolution of changes to the WorkFirst Subcabinet. The Subcabinet leadership has transitioned to the Legislative Executive WorkFirst Poverty Reduction Oversight Task Force (LEWPRO). WorkFirst legislation has resulted in the creation of the LEWPRO to help determine program outcomes, accountability measures, and to make program design recommendations to the Governor and Legislature. The Department of Social and Health Services (DSHS) will compile WorkFirst performance measures as legislatively required.

DSHS contracts with the State Board for Community and Technical Colleges to provide services to prepare WorkFirst (TANF) adults for entry into employment. From fiscal year 2002 through fiscal year 2008, the SBCTC subsequently awarded block grants to 34 community and technical colleges to deliver these education and job skills training services. From fiscal year 2009 to the present the SBCTC has administered a WorkFirst Delivery Agreement (WFDA) which continues to incorporate a strong emphasis on local planning and prioritization of services and leveraging resources to create efficiency and meet the needs of the current caseload.

In 2018 through a directive from Governor Inslee, the Poverty Reduction Work Group (PWRG), was formed. The group was charged with developing a 10-year plan to address poverty and racism in Washington State. To best address the ongoing poverty and inequality in our state, the PRWG membership represented different systems and sectors. Additionally, a Steering Committee was created to lead PRWG work comprised of community voices representing communities in poverty.

The Steering Committee led the PRWG in decision making focused on two key principles:

1. reduce poverty by addressing racism as the epicenter of impoverished communities and
2. incorporate and elevate community voices who experience poverty in decision making and the development of the 10-year plan.

These two groups along with many stakeholders worked together to develop Washington State's 10-year plan now known as Blueprint For A Just and Equitable Future. The plan calls for 8 strategies and 60 recommendations as a guide to addressing poverty and inequality in Washington State.[1]

In the 2021 legislative session, Governor Inslee signed an executive order creating a subcabinet focused on further developing and implementing the recommendations on intergenerational poverty reduction, including recommendations from PRWG and LEWPRO.

Cabinet officials from DSHS, Department of Children, Youth and Families, Department of Commerce and Employment Security Department comprise the Subcabinet on Intergenerational Poverty Reduction, together with participants from the Departments of Licensing and Labor and Industries as well as policy and budget staff from the governor's office, the Office of Equity and others.

SBCTC WorkFirst Delivery Agreement

The purpose of the WorkFirst Delivery Agreement (WFDA) application is for the existing community and technical college (CTC) WorkFirst training providers to specify the training and support services they will deliver in FY27. To prepare a WorkFirst Delivery Agreement application, providers are encouraged to meet with their Local Planning Area (LPA) partners (DSHS, ESD, Commerce contractors, and others) to gather input on needed training and support services, as well as to develop an inventory of support services provided within the community to leverage toward supporting WorkFirst students.

WFDA approval will be granted to those providers who demonstrate training and support services that 1) are designed to meet the needs of WorkFirst students, 2) verify compliance with all WorkFirst policies and state and federal guidelines, and 3) will be delivered in alignment with the WorkFirst Delivery Agreement principles for increased student achievement and accountability. Provider services offered by applicants will be assessed through their OGMS application responses and Budget Narrative as part of the application process.

Application Information

Who May Apply

Applications will be accepted for the 2026-27 WorkFirst Delivery Agreement from Washington's community and technical colleges as defined under RCW 28B.50.030.

[1] https://dismantlepovertyinwa.com/wp-content/uploads/2020/12/FinalExecSummary.pdf

How the College Applies

Access the 2026-27 WorkFirst Delivery Agreement Grant 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 FY27.

Submit completed grant applications for continuation of funding to the SBCTC through OGMS no later than April 2, 2026, at 11:55 p.m. SBCTC staff are available for assistance until 4:00 p.m. on April 2, 2026.

An OGMS user manual can be found in the How To section of OGMS.

Application Process

Participation Design Requirements

The development and implementation of effective policies and procedures to capture and report students' actual hours of participation remains a state and federal requirement. Programs should be designed to enhance a student's ability to meet participation requirements and positively contribute to the WorkFirst partnerships' statewide participation rate.

Examples of WorkFirst education promising practices are:

- Programs that contribute towards maximizing increased student achievement and participation (i.e., full time Vocational Education, I-BEST, or Degree Completion).
- Programs that increase the preparedness of parents to enter employment or increase their wages (i.e., I-BEST, Achieving Tipping Point, part-time work combined with part-time school).
- Increased opportunities for parents to gain competitive employment skills that are useful in the current employment market (Internships, Co-operative training, Work Study) paying attention to the contributing role of small business.
- Programs that demonstrate collaboration and promote optimizing available resources (i.e. On the Job Training, Job Connection and Career Development).

Program Mix Evaluation

In preparation for the grant development process, applicants will need to evaluate their current program mix with consideration to the purpose and intent of WorkFirst program outcomes. Your program mix should reflect the needs of WorkFirst students, WorkFirst partners and the community.

Elements to consider include:

- Ability to provide stackable non-core or stand-alone core activities to assist parents in meeting participation
- Providing access to services to increase student achievement (i.e. tutors, study labs,

computer access)

- Providing access to services to increase economic security (i.e. financial literacy, career services)
- Geographic responsibility, student accessibility and program cost

Collect and evaluate data on your previous enrollment, costs, and number/type of referrals to create your program mix. Meet with your WorkFirst partners to share your evaluation. Develop a proposed program mix, using Section 2 of the FY27 WFDA OGMS application, of offerings informed by 1) previous program outcomes, 2) input from your LPA partners, and 3) your local economy. Share your DRAFT plan with your entire LPA for discussion.

Applicable Laws and Data Security Requirements

A completed and signed FY27 Assurances document must be uploaded to the attachment section of your grant application in OGMS. Ensure a thorough review of the listed requirements, including appropriate signatures, as these replace many of the former grant questions and are checked during monitoring visits.

Fiscal Accountability Questions

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

Budget Matrix and Narrative

Describe the level of funding for each eligible WorkFirst activity and category on which you intend to expend grant funds. Provide enough detail to give a clear picture of where and how your funds will be used. Budget revisions can be made during the year. Refer to the Budget Revisions section for more information about the budget revision process.

Describe the processes and procedures you will use to develop and manage your WorkFirst grant and the programs and practices you will use to help your students be successful academically and become self-sufficient and resilient. Enough detail should be included to allow a reviewer to be able to understand what you intend to do and how you intend to direct your program during the grant year. It should be a tool you can use as a reference to guide you during the grant year.

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.

Program Funding

Funding Formula and Funding Policies

The following revised WFDA funding formula and related policies were approved by the College Presidents in January 2018 for implementation in FY19 and beyond:

Base Funding (formerly Student Support Award) - $77,290/provider
Formula Award (based on each provider's pro-rated share for each category):

- 50% - WorkFirst headcount (prior year)
- 10% - Employment (4 most recent quarters available)
- 10% - Transitions (prior year)
- 20% - Completions (prior year)
- 10% - Progression (prior year)

The base award is intended to ensure the WorkFirst program is available to students at all our colleges by providing funding for the required and essential administrative functions of the program.

Reviewed annually to keep alignment with the Office of Fiscal Management (OFM) salary schedule, the amount of the base award is based on a Program Coordinator position as posted by OFM salary schedule, with a salary Range of 41 at Step L annual salary of $57,252 and projected benefits. This does not mean each provider must employ a Program Coordinator to meet student support needs. This position is only identified to establish a base funding level for student support.

Enrollment based on headcount ensures the services are available to each student, regardless of their credit load. Transitions and Progression emphasize the ongoing support staff provide students to ensure their progress toward completion. Completion and Employment are expected deliverables of the WorkFirst program and colleges are accountable to performance outcomes.

Funding Policies

WorkFirst grant funds are awarded based on expected program need and past performance. Funds that are not projected to be used must be returned to SBCTC through funding surveys for reallocation based on system need. To facilitate this:

- SBCTC will conduct funding surveys during the fiscal year to move undedicated funds to those colleges demonstrating need. Grant recipients are required to complete each funding survey by the designated due date and return any unspent funds.
- SBCTC will share spenddown reports to College WorkFirst Program Administrators quarterly and to each college president annually.
- Grant recipients may submit an email to the SBCTC WorkFirst Program Administrator no later than two weeks after to the grant application release date requesting a WorkFirst Delivery Agreement Application with a lower budget total than planning award numbers,

and/or to request an increase or decrease of their earmarked Student Support Fund (SSF) or Work-Based Learning (WBL) amounts. The SBCTC may scale earmark returns or requests to maintain contractually required earmark levels across the WA CTC system. The new SSF and/or WBL amount(s) approved by the SBCTC become the college's earmarked SSF and/or WBL amount(s) for the upcoming fiscal year. Any unaccepted funds will be released to the system during funding surveys based on need.

- College take back status is taken into consideration when a college is considering increasing or decreasing their earmarks at the grant application stage. Colleges in the first or second year of take back cannot change their earmarked totals until the first funding survey of the fiscal year, after the take back process is completed. Full information on the take back policy is available in the Take Back Policy section of this document. Contact the WorkFirst Program Administrator to request an exception to this policy if needed.

Please note, if additional WorkFirst funding is awarded by DSHS after grant applications are completed and grant awards accepted, the SBCTC will apply the funding formula again and allocate the additional funds based on performance metrics. CTCs will have the opportunity to decline part of or all the increased funding.

Redistribution Policy

Grant recipients are expected to expend their awarded funds by the following timeline and corresponding percentages. Any unspent funds, including earmarked WorkFirst Work Study and Student Support funds, outside of the allowable range will be recalled by SBCTC for distribution to meet system needs. Funding surveys align with Redistribution Policy Deadlines to allow colleges to voluntarily return funds to fall within the allowable range.

- Through December - 40%
- Through March - 65% (Additional funds received from funding survey requests will not be taken into consideration when reviewing percent expended.)

The SBCTC will follow up with colleges after the December and March invoice deadlines to provide expenditure status for colleges that did not meet the expected expenditure targets.

Take Back Policy

If the actual WorkFirst final grant funds expended at a college fall short of the final award amount by more than 10% for two years in a row, the college will be subject to a reduction in grant funds in the next year going forward. The reduction is equal to 75 percent of the difference between the grant amount and the actual grant funds expended in the second consecutive year of missed targets.

Earmarked funds (e.g., WorkFirst Work Study and Student Support Funds) are not included in the annual take back calculations. If a grant recipient in a reduction year expends their award within the 10% allowance, they will receive their full award in the following year. Grant recipients can avoid continued application of the annual take back policy by expending their award within the 10% allowance as well as returning funds during funding surveys that are not projected to be expended.

Grant recipients in a take back year are permitted to request additional funds during funding surveys, however additional funds are not guaranteed, and additional accepted non-earmarked funds will be considered when calculating the annual expenditure percentage.

Approved Activities for SBCTC Providers

The following activities are approved for SBCTC providers; colleges may elect to offer some, or all of the activities based on regional need and college program offerings. The first column contains the corresponding Student Attribute for each activity type. More information about WorkFirst Student Attributes can be found in the SBCTC Student & Course Coding Manual on page 35.

Basic Education for Adults

ctcLink Student Group Code	eJAS Code	WorkFirst Component Name	Description and Information
SF05	GE	High School Equivalency	Classes that help students 20 years of age and older earn a high school equivalency certificate by preparing them for the high school equivalency (HSE) exam (a.k.a. GED). Basic Education is a non-core activity for students 20 years of age and older and must be stacked with at least 20 hours of core activities.
SF05	BE	High School Completion /HS+	Educational coursework preparing students 20 years of age and older to earn a high school diploma. High school completion programs for adult students 20 years old and older. The college will evaluate high school transcripts and advise on the classes needed to complete a diploma at the college. High School+ is a competency-based program for students who are at least 21 years old. This program turns life experience into high school credits. The student can demonstrate their knowledge in several ways, including work, life and military experience. Then, the student will take courses to fill in the gaps and earn a high school diploma. Basic Education is a non-core activity for students 20 years of age and older and must be stacked with at least 20 hours of core activities.

ctcLink Student Group Code	eJAS Code	WorkFirst Component Name	Description and Information
SF05	HS	High School Completion /HS+	Educational coursework preparing students 19 years of age and younger to earn a high school diploma. High school completion programs are for adult students 16 years old and older. The college will evaluate high school transcripts and advise on the classes needed to complete a diploma at the college. A high school release form is required for students who are 16, 17 or 18 years old. Basic Education is a core activity for those 19 years of age or younger.
SF05 or SF03 if JT	ES JT	ELA	English Language Acquisitions (ELA also known as ESL) courses. All ELA students must be referred to your contractor caseload as indicated by the DSHS case manager: • ELA is coded as ES when it is the student's core activity • ELA is coded as JT when the student has adequate English language skills to be engaged in other activities

Vocational Education

ctcLink Student Group Code	eJAS Code	WorkFirst Component Name	Description and Information
SF02	VE	Vocational Education	Vocational education includes all community and technical college two-year degrees and certificates, including AAS, AAS-T and AA-DTAs degrees, with documentation of the occupational goal. Running start students with an open TANF case of their own are eligible for WorkFirst for their college courses/degree only. If a student meets the 24-month extension criteria, the additional VE months may apply.
SF02	DC	Degree Completion	The last 12 months of a Vocational Education program, not to exceed a Baccalaureate degree that leads to a career in a high wage and high demand occupation. DC is a core activity and counts towards the students 12-month lifetime limit for vocational education. DC requests must be approved by SBCTC before a student can be placed into the component.

ctcLink Student Group Code	eJAS Code	WorkFirst Component Name	Description and Information
SF03	JT	Job Skills Training	Training that enhances a person's employability by providing specific skills that are marketable to employers. • Part-time Vocational Education courses; • Prerequisites and developmental/remedial education required for entry into a Vocational Education program; • Continuing Education courses (self-support) that are job skills-related that do not cost more than the amount of full-time resident tuition for one year. Basic Education for students with a high school diploma or general education degree to increase an individual's basic skills competencies and ability to find work. English Language Acquisition students that are determined by the DSHS case manager to have adequate English Language skills to engage in other activities. JT is a non-core activity and must be stacked with at least 20 hours of core activities.
SF01	PE	Customized Job Skills Training	An 8-22 week training program that is customized for specific employers or tied to a specific industry. CJSTs must include industry-specific technical training, be tied to jobs with good labor market demand, and target fields with better than average entry-level wages for your local area. PE is a core activity and counts towards the students 12-month lifetime limit for vocational education.

Life Skills

ctcLink Student Group Code	eJAS Code	WorkFirst Component Name	Description and Information
SF06	LS	Life Skills	Training programs designed to provide individuals with the skills to meet the demands of everyday life and employment. LS is a core activity time-limited to 12 weeks per year. Additional information and activity criteria are included on page 17.

Work-Based Learning

ctcLink Student Group Code	eJAS Code	WorkFirst Component Name	Description and Information
N/A	PT / FT	WorkFirst Work Study	Work study of 19 hours/week is recognized as a full-time core work activity. Less than 19 hours/week must be stacked with other core activities to equal a full-time core activity. FT component may be utilized if student is participating in 32 hours or more per week in work study, which may occur during breaks.
SF02	WE	Work Experience	Unpaid work-based learning activities such as internships, externships, practicum, work experiences, job shadowing activities, service-learning experiences, and other unpaid work activities, during which an instructor is not present at the work site. Work experience may be classified as a non-core or core activity depending on program requirements (see WorkFirst Handbook 7.5.1 What are Internships and Practicums?) and may be stacked with other core and non-core activities as needed to reach full time participation, while not exceeding the FLSA maximum.

Vocational Education Extension Policy

Effective July 23, 2017, full-time vocational education (VE) opportunities for WorkFirst students may extend to 24 months. On June 30, 2017, legislation passed allowing these education opportunities to increase from 12-month to 24-month limits. This change increases the likelihood of degree/certificate completion, which may lead to a better wage at entry-to-employment and positively impact child and family well-being.

During FY27, Community and Technical Colleges are permitted to extend the student's lifetime 12-month limit in a VE component for up to an additional 12 months if the following criteria are met:

- The college is utilizing the time limit extension within their FY27 WorkFirst allocation,
- VE coding is only used with a minimum of 20 component hours,
- The student is offered the option of a work-based learning activity that can be stacked with a JT,
- The student's VE components are within a single vocational program pathway (the extension is not permitted for changing to a new program of study),
- A current or returning student that has exhausted their 12-month limit may continue toward an uncompleted degree or certificate, but may not begin a new program of study,
- The college must develop an extended academic plan identifying prerequisites and core courses by quarter and maintain an up-to-date copy in the student's file. It must include the student's anticipated academic quarter of completion and be updated quarterly and as circumstances change,
- The college completes all required billings and funding surveys by the established deadlines and returns funds projected to be unspent within the fiscal year for redistribution to the system.

Community and Technical Colleges will determine a student's eligibility for this time limit extension and will include the following information quarterly in the Education and Training Worksheets and Client Notes in eJAS:

- a statement of the extension,
- identification of vocational program of study,
- identification of expected quarter of completion. The vocational extension may not be applied prior to the student's 12th month of VE.

Degree Completion Requests

Degree Completion (DC) are activities which must be approved by SBCTC and refer to vocational training programs that meet certain wage and labor market requirements, result in a vocational certificate or degree, and which can be completed within 12 months and may not result in a degree higher than a BAS. These DC activities count toward a client's lifetime Vocational Education (VE) limit (12 months). SBCTC approves or denies these requests based on certain criteria outlined in the WorkFirst Handbook. The WorkFirst Handbook also contains the process and form for requesting approval for DC activities. Programs for this training must lead to work that is high wage and in-demand in Washington State. Colleges may not use the DC component without prior approval from the SBCTC. DC Requests and questions may be directed via the encrypted email process to the current Student Support Programs Integrations Coordinator.

Life Skills Guidance

Life skills activities prepare participants to meet the demands of everyday life, employment, and activities. Colleges may create activities that are locally designed and operated to maximize available resources to best serve the participants within the community.

Per the DSHS WorkFirst Handbook, section 7.3.5, What is Life Skills Training? and page 13 of the 2025-26 WFDA Grant and Fiscal Guidelines,

Life skills training can:

- Be independent from Job Search
- Stack with other Job Preparation/Job Search activities

Life skills training may include topics such as:

- Self-awareness
- Attitude
- Balancing work and personal life
- Money management
- Stress and anger management
- Time management
- Communication skills
- Appropriate standards for dress and participation

For additional support, DSHS offers a Life Skills (LS) and Job Skills Training (JT) Differences document, which CTC staff can use to differentiate activities for the two components.

To assist colleges in administration of LS training, below are examples of types of activities that are allowable for LS activities.

Sample Allowable LS Activities/Classes

- Managing Bills class or activity
- Employment and Education Readiness class or activity
- Resiliency and Adaptability class or activity
- Interpersonal Communication class or activity
- Anger/Stress Management class or activity
- Organization and Time Management class or activity
- Cooking and Nutrition class or activity

Sample Unallowable LS Activities/Classes

- Smoking Cessation class or activity
- Driver's Education class or activity

- License Revocation (or other legal issues) class or activity
- Parenting class or activity
- Any crafting classes or activities that are unrelated to the topics listed in section 7.3.5 of the WorkFirst Handbook
- Homework time

If your college would like assistance setting up a Life Skills program or activity, the SBCTC WorkFirst team is available for any programmatic or technical support. Please reach out to the current WorkFirst Program Administrator with your support needs.

WorkFirst Student Eligibility

The WorkFirst program is a need-based program that supports individuals and families receiving a Temporary Assistance for Needy Families (TANF) grant from DSHS and has been referred to a college by DSHS for education and training. Students must be open on TANF and currently enrolled in classes or enrolled in classes in the upcoming quarter. International students and students with the intention of transferring to a 4-year university are not eligible for tuition assistance.

Support Services for Participants

Support Services are transitional by nature and are not an ongoing supplement to the student's grant. Support Services are defined as tuition assistance, textbook assistance, loaner laptops and WorkFirst Work Study. Support Services are the minimum supports for engagement in WorkFirst activities at colleges and thus are not documented via the Support Services Authorization in eJas, nor are minimum support services counted towards the participant's $5,000 annual limit. Support Services are not an entitlement and must be carefully managed.

Student Support Funds

The funds must be carefully managed. Student Support Funds available to the system are expected to total $1,100,000 for state fiscal year 2027.

There is a maximum of $5,000 per student per program year that can be awarded across all WorkFirst contractors and DSHS WorkFirst services.

Colleges awarding Student Support Funds should take note of suggested limits for each category on the table below. The suggested amounts are the average cost of support funds; however, vendors and other factors may increase or decrease the cost in your service area. Colleges may determine funding decisions for each support based on local market information if the amount for each support does not exceed any funding limits and/or the program year limit of $5,000 per student. Additionally, please refer to the Support Services Directory suggested use and dollar limits for each service.

Costs per support cannot exceed what would be reasonable and necessary for a non-WorkFirst student. All other sources of payment should be considered first before expending WorkFirst Tuition Assistance and Student Support Funds.

Student Support Funds Categories & Suggested Limits

College Provided	Description	Suggested Limits
Tuition Assistance	WorkFirst can provide assistance with tuition and fees for Adult Basic Education, High School Equivalency, short-term training, Vocational Education, and other eligible programs.	There is no suggested limit, however, WorkFirst tuition should be reserved for students who do not have other financial aid funding available to them.
Textbook Assistance	WorkFirst can provide assistance for the cost of required textbooks.	There is no suggested limit, however, WorkFirst textbooks should be reserved for students who do not have other financial aid funding available to them.
Loaner Laptops	The purchasing and loaning of equipment and services for WorkFirst students as part of a loaner program managed by the college to ensure access to Canvas and online college resources is an allowable expense within the WorkFirst program.	
WorkFirst Work Study	Colleges can approve 1-19 hours/week of work study. Work study of 19 hours/week (WorkFirst, federal or state) is recognized as a full-time core work activity. Less than 19 hours/week must be stacked with other core activities to equal a full-time core activity. WorkFirst work study placements can be on or off campus, at non-profit organizations or at for-profit businesses. It is coded as part-time employment (PT) in eJAS and assigned to the college's caseload. During break periods, it may be coded as full-time employment (FT).	WorkFirst work study students must be a current TANF recipient currently enrolled in classes or enrolled in the upcoming quarter. WorkFirst work study students cannot displace or supplant current employees. WorkFirst work study awards must be issued through ctcLink and applied to the student's financial aid package. WorkFirst work study students cannot be placed at non-secular institutions.
Tools	WorkFirst can provide assistance tools/kits and supplies required for a student's program and/or activity.	$750 per program year

College Provided	Description	Suggested Limits
Clothing	WorkFirst can provide assistance for the cost of required uniforms/specialized clothing, PPE, and caps and gowns that are required for graduation. Also, to include clothing to seek and maintain employment or participate in a work-like activity.	$75-$150 for employment clothing, $25-100 for cap and gown, $300 for uniforms/specialized clothing for training or education programs
Transportation	WorkFirst can provide assistance for the cost of a bus pass, van pool, train, ferry, and gas cards to help the student get to and from their required activity. Included in this category is car repair and license and fees, such as vehicle licensing plates/tabs, fees for establishment/reestablishment of driver's license, emissions testing and title transfer. May include charges for repair estimates (computer diagnostic tests) if a fee is standard in the community. Repairs must have at minimum two estimates from a licensed automobile mechanic. Estimates must itemize all repairs and costs necessary Please see the Student Support Budget Categories section for requirements for each.	$200 per program year for licensing and fees, $250-$500 per program year for car repair, $150 per month for public transportation, $100 per request for gasoline
Testing	WorkFirst can provide assistance for the cost of literacy, aptitude, skills proficiency, credential testing and certifications.	$250 per request
Medical	WorkFirst can provide assistance for the cost of medical exams/services necessary to accept employment or participate in WorkFirst activities that are not covered by Apple Health. May include (but not limited to): doctors' visits, counseling, and exams. *note that counseling does not count towards the annual limit.	$200 per exam
Personal Hygiene	WorkFirst can provide assistance for the cost of items reasonably needed by the student to maintain personal appearance and grooming. Such items include: haircuts, soap, shampoo, toothpaste, mouthwash, deodorant, shaving supplies, feminine hygiene products, makeup, laundry supplies, hair color, and cleaning supplies.	$50 per request for haircuts and $100 per request for other items

College Provided	Description	Suggested Limits
Emergency Costs	WorkFirst can provide assistance for the cost of internet services (fees for set up and or maintenance of internet), computer equipment (mouse, cords, USB drives, etc. If no other resources exist computers and laptops may be purchased for the student), and diapers/pull-ups, wipes, creams and ointments for a child to attend daycare so the parent can participate in required activities.	$100 per month/per child, $500 per program year for computer equipment, and $300 per program year for internet services

Student Support Funds Documentation and Reporting

To qualify for WorkFirst Student Support funds, each institution receiving WorkFirst Delivery Agreement funding must comply with the federal requirements for supervising, documenting, reporting, and verifying participation by WorkFirst (TANF) students in WorkFirst activities using the eJAS system.

- Colleges administering the Student Support Funds are required to manage these funds carefully to ensure duplication of supports doesn't occur. All other funding sources must be exhausted before using WorkFirst Student Support Funds.

Before awarding Student Support Funds, you must:

- Receive a signed student attestation of request for support services that includes, at minimum, the following information:
  - Request date
  - Support service(s) request type(s)
  - Amount(s) requested
  - Student signature
- Verify student's eligibility and IRP status
- Check eJAS to ensure the student has not previously received the same support they are requesting from another provider

Student Support Funds Documentation in eJAS

To avoid duplication of services across WorkFirst contractors, college staff must document in eJAS when a student receives, or is denied, Student Support Funds from the WorkFirst program. Student Support Funds awarded must be recorded in eJAS using the College Support Services screen. All student support services requested, issued, or denied must be documented with justification in the eJAS case notes for the student. Noting the award via the College Support Services screen will generate a case note.

College staff cannot edit or cancel a support service entry once entered, support service entries

can only be cancelled by SBCTC. Please send requests to cancel support service entries to StudentSupport@sbctc.edu and include the following:

- Jas ID
- Support services sub-category type (transportation, hygiene, etc.)
- Date entered in eJas
- Reason for cancelation

Do not include the name of the student in your email. The Student Supports Program Canvas Community > WorkFirst Module > Student Support Screen Guide includes step-by-step instructions for entering support service awards in eJas. Please contact StudentSupport@sbctc.edu to be added to the Canvas Community if you do not have access.

Awarding WorkFirst Financial Aid & Student Support Funds

WorkFirst Financial Aid, also known as Tuition Assistance, and Student Support Funds are intended to assist WorkFirst (TANF) parents to gain the skills needed to become employed or to advance to exit TANF through wage and skill progression. The student must be active on the college's eJAS caseload to receive WorkFirst Funding. Review the parent's Individual Responsibility Plan (IRP) to verify eligibility for WorkFirst (TANF).

Institutions choosing to dedicate WorkFirst Delivery Agreement funds to WorkFirst Financial Aid can pay for tuition, required fees, books and Student Supports for any of the approved activities listed for SBCTC providers.

All WorkFirst Tuition Assistance and Student Support Funds must be awarded through ctcLink and applied to the student's financial aid package. All WorkFirst funding is collected and reported by the SBCTC as need-based funding. Colleges must use the established WorkFirst Global Item Types to uniquely identify those awards funded from the DSHS/WorkFirst program.

To give colleges the flexibility to best support their WorkFirst students-effective July 27, 2022, colleges may award WorkFirst BE, LS and VE Books as disbursable to the student or continue to pay the bookstore charges directly. Grant funds used for Tuition and Fees may NOT be given directly to a student.

The following global item type numbers have been reserved for WorkFirst funding. Item types with "ND" in the description are placeholders for FA tracking outside student supports – these item types do not disburse to the customer account and are used when the award needs to be reflected on a financial aid award for a student, but the method of payment is not through the Financial Aid office (i.e., AP Check or PCard). This way the award can be reflected on the student's Financial Aid award without paying to the student account.

WorkFirst Global Item Type Numbers

Item Type Number Reserved	Category	Description	Short Desc	Refun-dable	Account Types	CPL (may vary by local CPL options)
912000002000	Tuition and fees	WorkFirst Tuition & Fee BE	WkFrstTFBE	N	FEE,MIS, TUT	WAIVET&F
912000002010	Tuition and fees	WorkFirst Tuition & Fee LS	WkFrstTFLS	N	FEE,MIS, TUT	SBCTCT&F
912000002020	Tuition and fees	WorkFirst Tuition & Fee VE	WkFrstTFVE	N	FEE,MIS, TUT	SBCTCT&F
912000002030	Books	WorkFirst Books BE	WkFrstBkBE	N	FEE, MIS	FBKSTONL
912000002033	Books	WorkFirst Books BE Re	Wk1stBkBERf	Y	FEE, MIS	FSBREFND
912000002034	Books	WorkFirst Books BE Rf 2nd	W1stBkBERf2	Y	FEE, MIS	FSBREFND
912000002040	Books	WorkFirst Books LS	WkFrstBkLS	N	FEE, MIS	FBKSTONL
912000002043	Books	WorkFirst Books LS Ref	Wk1stBkLSRf	Y	FEE, MIS	FSBREFND
912000002044	Books	WorkFirst Books LS Rf 2nd	W1stBkLSRf2	Y	FEE, MIS	FSBREFND
912000002050	Books	WorkFirst Books VE	WkFrstBkVE	N	FEE, MIS	FBKSTONL
912000002053	Books	WorkFirst Books VE Ref	Wk1stBkVER	Y	FEE, MIS	FSBREFND
912000002054	Books	WorkFirst Books VE Rf 2nd	W1stBkVERf2	Y	FEE, MIS	FSBREFND
932000002000	Work Study	WorkFirst Work Study	Wrk1stWS	N		
932000002010	Work Study	WorkFirst WS Off Campus	Wrk1stWSOC	N		
912000002060	Clothing	WorkFirst Clothing	WkFrstClth	Y	FEE, MIS	FMISCFEE
912000002070	Clothing Non Disb	WorkFirst Clothing ND	Wrk1ClthND	N	TUT	
912000002080	Emergency Costs	WorkFirst Emergency	WkFrstEmrg	Y	FEE	FMISCFEE

Item Type Number Reserved	Category	Description	Short Desc	Refun-dable	Account Types	CPL (may vary by local CPL options)
912000002090	Emergency Costs Non Disb	WorkFirst Emergency ND	W1stEmrgND	N	TUT	
912000002100	Medical	WorkFirst Medical	WrkFrstMed	Y	FEE	HLTHCARE
912000002110	Medical Non Disb	WorkFirst Medical ND	Wk1stMedND	N	TUT	
912000002120	Personal Hygiene	WorkFirst Personal	Wrk1stPers	Y	FEE	FMISCFEE
912000002130	Personal Hygiene Non Disb	WorkFirst Personal ND	W1stPersND	N	TUT	
912000002140	Testing	WorkFirst Testing	Wrk1stTest	Y	FEE	FMISCFEE
912000002150	Testing Non Disb	WorkFirst Testing ND	W1stTestND	N	TUT	
912000002160	Tools & Supplies	WorkFirst Tools	Wrk1stTool	Y	FEE	FMISCFEE
912000002170	Tools & Supplies Non Disb	WorkFirst Tools ND	W1stToolND	N	TUT	
912000002180	Transpor-tation	WorkFirst Transportation	Wrk1stTran	Y	FEE, MIS	TRNSPORT
912000002190	Transpor-tation Non Disb	WorkFirst Transportation ND	Wk1TransND	N	TUT	

To request these item types be created for your college, please open a Ticket under the following SolarWinds request type: ctcLink Support • Campus Solutions • Student Financials • Item Types.

Exception to Rule

An Exception to Rule (ETR) can be requested for providing Student Support Funds. There are four scenarios in which a WorkFirst college would request an ETR:

1. A participant has a crisis situation (such as fleeing domestic violence), per the DSHS WorkFirst Handbook.
2. A participant has a unique and justifiable need that can be approved through the formal exception to rule process, per the DSHS WorkFirst Handbook.
3. A college needs to provide a participant with supports that are not specifically outlined in the DSHS Support Services Directory or are the same type of support already received, per

the Student Support Funds Categories & Suggested Limits section of this document.

4. A college accidentally awards a participant over the $5,000 yearly Support Funds limit.

Participant Needs ETR

To request an ETR please email the current WorkFirst Program Administrator via the encrypted email process with the following information:

To request an ETR to award a participant funds beyond the $5,000 yearly limit due to scenarios 1-3 listed in the Exception to Rule section, please use the following process:

1. Email the current WorkFirst Program Administrator via the encrypted email process with the following information:
   A. Student Name
   B. eJAS ID Number
   C. Type of Support Needed
   D. Amount of Support Requested
   E. Time Frame for Support (i.e., a single quarter, a year, etc.)
   F. Justification for Support Requested
2. The SBCTC will process your request and respond to you with applicable instructions in a timely fashion.

Over Awarding of Support Services ETR

This section details what to do in the event of an accidental award to a participant over the $5,000 yearly limit, as described in section 2.2.3 of the DSHS WorkFirst Handbook, as well as measures that colleges must implement to prevent over awarding.

Colleges must implement processes so that students are not awarded Student Support Funds beyond the $5,000 yearly limit.

It is best practice for colleges to disburse Student Support Funds as soon as possible after the approval date. These funds are awarded across all WorkFirst contractors and DSHS WorkFirst services. Disbursing Student Support Funds as soon as possible means it is less likely that additional supports will be awarded by other providers in the period between the college's approval and disbursal of Student Supports.

If more than seven business days elapse between the approval of Student Support Funds and their disbursal, colleges must have processes in place that describe how their staff do the following before disbursing a Student Support Funds award:

- re-review student eligibility
- re-review the student's cumulative Support Services limit

If you need to award a participant funds beyond the $5,000 yearly limit because a participant has accidentally been awarded over the $5,000 yearly limit, please request an ETR using the following steps:

1. Email the current WorkFirst Program Administrator via the encrypted email process with the following information:
    A. Student Name
    B. eJAS ID Number
    C. Amount awarded beyond the $5,000 yearly limit
    D. Request and approve date for the Support Services beyond the $5,000 yearly limit
    E. Disbursement date for the Support Services beyond the $5,000 yearly limit

The Program Administrator will then take the following steps to facilitate an ETR.

1. The Program Administrator reviews and tracks the over awarding details
2. The Program Administrator approves the college over award of funds, and responds to you with applicable instructions in a timely fashion

This process is not meant to be utilized on a recurring basis and should be used only as necessary. In alignment with policy, colleges should have processes in place to mitigate potential over awarding.

To support colleges, the SBCTC may schedule additional training on this topic if during the Program Administrator review of the ETR request it is determined that the college could benefit from additional efficiencies to mitigate the risk of over awarding.

Work-Based Learning Guidelines

Work-Based Activities within an Educational Component

Work-based activities such as a clinical, where a faculty member or instructor is present, and instruction takes place at a work site, are to be considered part of the education and training program and coded accordingly. For example, clinical experience during a Nursing Assistant Customized Job Skills Training (CJST) program is to be classified as CJST (PE in eJAS and carried by the college on their caseload).

Unpaid Work-Based Activities

Unpaid work-based learning activities such as internships, externships, practicum, work experiences, job shadowing activities, service-learning experiences, and other unpaid work activities, during which an instructor is not present at the work site, are to be considered as Work Experience (WE in eJAS and carried by the college on their case load). It is the institution's responsibility to ensure that the activity and number of hours worked is in accordance with federal law, in particular, the Fair Labor Standards Act (FLSA), and that any required insurance is provided

(L&I).

WorkFirst Work Study

WorkFirst Work Study funds are available to the system are expected to total $1,500,000 for state fiscal year 2027.

Providers may choose to provide WorkFirst Work Study in conjunction with classroom training. This type of work-based learning is paid, subsidized employment (PT in eJAS and carried by the college on their caseload). A WorkFirst student may be enrolled in an immediate future quarter and receive a WorkFirst Work Study award. For example, if a student completes WorkFirst program intake in summer quarter and enrolls for fall quarter classes, it is allowable to award this student with a summer quarter WorkFirst Work Study award.

Providers should use their existing work-based learning policies, including federal or state Work Study guidelines, as appropriate, for operating rules to administer WorkFirst Work Study. The exception is that WorkFirst funds pay 100 percent of the wage for Work Study.

To be eligible, students must:

1. Enroll in classes, including Vocational, High Wage/High Demand, Customized Job Skills Training, I-BEST, Basic Education, or Skills Enhancement Training, leading to either unsubsidized employment or entrance into education and training programs leading to work

   AND

2. Be a current WorkFirst (TANF) recipient referred to the college.

Work Study (WorkFirst, federal, or state) may be an appropriate activity for WorkFirst (TANF) clients who need work activity to meet their WorkFirst participation requirements so they can access training. Full-time is defined as 32-40 hours of combined training and homework per week. For example, a student participating in 20 hours of core education and training per week may add or "stack" Work Study of 12 hours per week to reach full-time participation. Whenever possible, Work Study jobs should relate to the training and career plans of the students. When establishing Work Study positions, institutions must avoid displacement or supplanting of current employees. Placements can be either non-profit or for-profit locations, on campus or off and must be non-secular.

WorkFirst Work Study placement must be documented in the student's file and in the student's eJAS Education and Training Worksheet and client notes on a quarterly basis showing, at minimum, the student's employment start and end dates, their worksite placement, their hourly wage, and the number of regularly scheduled hours of work per week. All WorkFirst Work Study must be awarded through ctcLink and applied to the student's financial aid package. Work Study is subsidized paid employment not to exceed 19 hours per week, unless the student is approved for additional hours (not to exceed 40) during break periods, preferably in a job that enhances the student's employability. Time and Effort reporting must be maintained in the student's file in alignment with SBCTC T&E Guidelines.

For students to be counted correctly for WorkFirst Work Study, the student must be coded as a WorkFirst student. The college should use the correct global item type for WorkFirst Work Study, and the award should be active.

Paid Sick Leave for Employees under Minimum Wage Act

Effective January 1, 2018, paid sick leave for all workers who meet the definition of "employee" as defined in the Minimum Wage Act, Chapter 49.46 RCW are eligible to receive paid sick leave in the amount of 1 hour for every 40 hours worked.

WorkFirst Work Study students meet the definition of "employee" as defined in RCW 49.64 and therefore the following criteria applies:

- Student employees will not serve a 90-day wait period before accessing accrued sick leave[2]
- Student employees must accrue paid sick leave at a minimum rate of 1 hour for every 40 hours worked, this time will accrue in quarter hour increments and accrues continuously based on all hours worked[3]
- There is no cap for paid sick leave accrual, however, sick leave in excess of 40 hours will be eliminated on December 31 each year, unpaid sick leave of 40 hours or less will be carried over to the next year[4]

  Funds cannot be expended until sick leave is taken/used by the employee[5]
- Example: sick leave taken the first week of February would need to be reported in the time and leave system for that pay period (Pay Period is 2/1 - 2/15, sick leave used on 2/5 would be reported in their time and leave for that pay period)
- For a sick leave absence exceeding 3 consecutive days, an employer may require verification that use of paid sick leave is for authorized purposes as per RCW 49.46.210 (1)(b) and (c) [6]
- Note of clarification: sick leave accumulating to 3 consecutive days must be utilized before requiring verification from employee under the L&I policy. WorkFirst attendance policies still apply
- Sick leave accrued under Initiative 1433 does not have a cash value at the time of separation
- Colleges must retain accrued sick leave balance at time of separation for 12 months following termination of employment[7]
- If a student employee is rehired within 12 months of separation, the employer must reinstate previous accrued paid sick leave balance from the previous period of

[2] SBCTC Human Resources Policy, 2018
[3] Washington State Labor and Industries Policy, 2018
[4] SBCTC Human Resources Policy, 2018
[5] SBCTC Human Resources Policy, 2018
[6] Washington State Labor and Industries Policy, 2018
[7] Combined SBCTC and L&I Policy, 2018

employment[8]

- College districts must adopt or amend existing leave policies/procedures to address issues related to sick leave accrual/usage for student workers[9]

Although Federal Financial Aid program funds cannot be used to pay sick leave, WorkFirst Delivery Agreement Funds may be used. WorkFirst program staff should work with their human resources and business office staff to create policies and procedures for tracking and paying sick leave. The expenditure of WorkFirst funds for WorkFirst Work Study sick leave is allowable if it meets your local college policies.

Local Ordinance

Seattle, SeaTac, and Tacoma Colleges may be impacted by local ordinances offering more favorable sick leave accruals and minimum wages.

Student Management System Coding, Verification, And Reporting Guidelines

WorkFirst Coding

All WorkFirst students must be designated with a specific WorkFirst code to track them for college performance and system accountability. All WorkFirst students are coded with a WorkFirst Student Attribute Value, as indicated below, to add them to the WorkFirst "SWRF" Student Group. Student coding must be reviewed each term, with the attribute being removed after the term that the student is no longer eligible and before the following term begins. This coding must be in place for each quarter the student is enrolled.

Coding Values

Valid WorkFirst Student Attribute Values are listed in the Approved Activities Table on page 11, and in the SBCTC Student & Course Coding Manual, page 38. To manage these, please use the QRG: Managing Student Attributes.

Verifying Coding Quarterly

With an increased emphasis on accountability and performance, it is essential that College WorkFirst Program Administrators verify their institution's quarterly data before it is collected by the SBCTC. For accurate reporting and performance measurements work with campus registrars for quarterly reporting dates and timelines to verify students enrolled in the "SWRF" WorkFirst Student Group. Each quarter, the SBCTC (or data warehouse) will provide colleges with the previous quarter's outcome data. These reports are deemed official and final.

Enrollment Reporting

Enrollments funded through WorkFirst in the form of tuition assistance for students enrolled in

[8] Washington State Labor and Industries Policy, 2018
[9] Washington State Labor and Industries Policy, 2018

courses that are part of the college's state-funded instructional programs can be counted as state supported FTES. This represents a continuation of past practices. All other FTES generated from this funding will need to be counted as contract training FTES.

Student Achievement Data

The SBCTC will continue to monitor increased I-BEST enrollments, student achievement, new student enrollments, student retention and transitioning from Pre-college to Vocational Training. Student Achievement Data is based on Student Achievement Initiative Points. Data is collected for students enrolled in a community and technical college during the academic year coded with valid ctcLink Student Attribute "SWRF" Values as listed in the above table.

WorkFirst Program and Fiscal Compliance

In addition to requirements identified in this WFDA Grant and Fiscal Guidance document, compliance with all DSHS policies and procedures as outlined in WorkFirst Handbook is also required.

Local WorkFirst Policy and Procedure Manual

WorkFirst 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.

Policy and procedure manuals should focus on local college processes for administering the program and at minimum include two sections: one for student services and another for administration, clearly identifying both program and fiscal operations. Procedures should include step-by-step instructions on how to carry out each duty.

Please refer to Appendix A for SBCTC's Policy and Procedure Table of Contents Guide.

Local Planning Area Participation

Participation in the WorkFirst Local Planning Area (LPA) representing the provider's service area is required and collaboration with other WorkFirst providers is expected.

Student Participation

To qualify for WorkFirst funding, each college receiving WorkFirst Delivery Agreement funding must comply with the federal requirements for supervising, documenting, reporting, and verifying participation by WorkFirst (TANF) students in WorkFirst activities using the eJAS system.

Daily supervision of activities is required. Participation is to be documented monthly and must be reported by the 10th day of the following month. Excused and unexcused absences must also be reported according to policy identified in the WorkFirst Handbook including Immediate Notifications in eJAS for:

- Not maintaining satisfactory progress
- Failure to participate as required

- 2 or more excused or unexcused absences in a month

Participation hours must be entered into eJAS even if a student is late turning in their attendance. Participation hours can be entered for the current month and up to two months prior, if needed. When entering late participation hours, college staff must make a case note in the eJAS system indicating the student submitted their attendance late.

Absences can be made up, or participation hours banked when absences are anticipated. Reporting of this information is done through the Department of Social and Health Services technology eJAS system.

Institutions must also comply with verification procedures established by the federal government. The terms and conditions of these requirements are subject to change in the event of additional federal requirements/determinations or new requirements in the WorkFirst contract between the State Board for Community and Technical Colleges and the Department of Social and Health Services.

WorkFirst Validation Reviews

The WorkFirst Validation Review Team within the DSHS Division of Program Integrity (DPI) typically requests attendance documentation monthly to conduct a verification of participation hours entered into eJAS by the colleges.

The WorkFirst Program Administrator receives the request from DSHS which includes a randomly selected list of clients from CTCs across the system. Not all CTCs are included in each request. Upon receiving the request from DSHS, the SBCTC contacts the CTCs individually via encrypted email to make the request for attendance documentation.

CTCs must submit the requested documentation to the SBCTC via a secure SharePoint hyperlink, who then reviews the documentation, consolidates and tracks it, follows up as needed, and ultimately submits the documentation to DSHS on the colleges' behalf. The DPI Team reviews the documentation to verify the participation hours that were entered by the college in eJAS. Questions about WorkFirst Validation Reviews may be directed to the current Student Support Programs Integrations Coordinator.

Education and Training Plans

In addition to requirements identified in the WorkFirst Handbook, the Education and Training Worksheet must be completed and updated each quarter with:

- Approval status and appropriate component
- Training Options
- Student's Program of Study anticipated start and end dates
- Program of Study, current quarter, courses, credits, total participation hours, credits completed, satisfactory progress, and any educational milestones completed within the given quarter
- Work Study employment start and end dates, student's worksite placement, student's

hourly wage, and the number of regularly scheduled hours of work per week

- Vocational Education statement of the extension
- Vocational Education program of study
- Vocational Education extension expected quarter of completion

Student Files

An individual case file must be maintained for each WorkFirst student either electronically or in hard copy. If maintaining electronic student files, electronic data security requirements must be met, and hard copies must be produced in the event of an audit or monitoring visit.The Local Policy & Procedure Handbook should indicate where components of the electronic file are located. In addition to requirements identified in the WorkFirst Handbook, the following documentation must be available for each student case file:

- Program Application (Intake form)
- DSHS Consent form 14-012(x) completed and signed by each student
- Up-to-date long-term Academic Plans for ALL students
    - An 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. It is the goal for all WF students to have an up-to-date academic plan, however SBCTC is aware that colleges are transitioning to Guided Pathways and ctcLink and that at times there may be a delay in acquiring academic plans and getting an updated plan in a timely manner. If an up-to-date academic plan is unavailable, alternate documentation may be used. This documentation should identify long term goals including employment goal and expected graduation date. The documentation should include what has been taken in the past and what the student is registered for in the current quarter. It should have a way to indicate whether classes were passed to show progression.

    Examples of documentation that would meet this requirement:

        - Academic Plan(preferred)
        - The Advisement Report from ctcLink (BEdA students Grade reports can be used), with the Scope and Sequence from the Program with projected graduation date indicated (okay to hand-write)
        - The sample plan in Appendix B
        - Any other combination of documentation that meets the requirements in the checklist
- Attendance records signed by appropriate staff at least every two weeks
- Documentation of verified actual hours including supervised hours, missed hours due to

excused absences, unexcused absences and holidays

- Expected unsupervised homework hours as documented on the WorkFirst Homework Calculator Tool (or the standard DSHS Weekly Attendance Sheet)
- Student Supports Funds requests (if applicable, see next section)

Alternate Attendance Forms

Attendance forms must be collected for all students regardless of the activity, whether the activity is Life Skills, Vocational Education, or any other activity.

An Alternate Attendance form is any form other than the standard DSHS Weekly Attendance Sheet or Approved Weekly Attendance Form PDF. If a WorkFirst provider would like to use an Alternate Attendance form, the provider must submit its proposed Alternate Attendance forms to the SBCTC for review and approval in OGMS with each funding year grant application. The forms are submitted as an OGMS attachment. All Alternate Attendance forms must meet requirements stipulated in the WorkFirst Weekly Attendance Form—Minimum Requirements document located in the "Grant Info" OGMS tab.

WorkFirst staff will approve or deny submitted Alternate Attendance forms and post decision results in the Feedback tab of OGMS. Any Alternate Attendance Form must be approved by the SBCTC, regardless of the activity, whether the activity is Life Skills, Vocational Education, or any other activity.

A WorkFirst provider is considered out of compliance if utilizing an unapproved Alternate Attendance form.

Maintaining electronic alternate attendance files is permitted, however, hard copies must be produced upon request for monitoring and audit purposes.

If a college would like to start using an Alternate Attendance form or make changes to its already approved Alternate Attendance form in the middle of a fiscal year, the college must:

1. Upload the new or updated Alternate Attendance form as an attachment in OGMS to the applicable fiscal year's grant application. For example, to the FY27 application if the change to the alternate attendance form is taking place in FY27.
2. Email the current WorkFirst Program Administrator notifying them that the college is requesting approval for a new or updated alternate attendance form.
3. WorkFirst staff will review the submitted Alternate Attendance Form and post decision results in the Feedback tab of OGMS. As a reminder, colleges may not use alternate attendance forms before the SBCTC has granted approval. A WorkFirst provider is considered out of compliance if utilizing an unapproved Alternate Attendance form.

A college is allowed to shift back to using the standard DSHS Approved Weekly Attendance Sheet at any time during the fiscal year. To do so:

1. Email the current WorkFirst Program Administrator to notify the SBCTC of the change, so that SBCTC staff are aware what forms to expect during monitoring and other processes,

such as WorkFirst Validation Reviews.

2. SBCTC WorkFirst staff will note the change in the Feedback tab of OGMS.

WorkFirst Performance Measures

After the SBCTC data snapshot for each quarter has passed, the SBCTC data services team compiles the WorkFirst data reported by college and sends the following performance measure to DSHS and the WorkFirst partnership:

- WF adults obtaining High School Equivalent Certificate (GED)
- WF adults earning high school diploma through HSC or HS+ programs
- WF Adults in ESL/Basic Education at Community Colleges w/Measurable Skill Gain
- WF Adults in ESL/Basic Education - Transition to Training at Community Colleges
- WF Adults in Workforce Education with Measurable Skills Gains
- WF Adults Earning Certificates, Degrees, Apprenticeships at Community Colleges

These measures are subject to change as the needs of the WorkFirst partnership change.

Performance measures are intended to assess how activities:

1. promote TANF student achievement and progress towards self-sufficiency, and
2. meet the requirements of the federal TANF block grant for Washington State.

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 or remote monitoring visits. The SBCTC SSP Team monitors one third of CTC WorkFirst programs every state fiscal year, and colleges can expect to be monitored at least once every three years. Colleges may be monitored more than every three years.

Monitoring Outline

The monitoring outline includes a combination of in-person and virtual monitoring processes. Colleges who have received findings from a previous year's monitoring may require in-person monitoring. Colleges without findings from previous years may have virtual monitoring. The SBCTC reserves the right to determine which colleges receive in-person monitoring visits. The process for communications and collection of information and documents is the same for virtual and in-person monitoring unless otherwise specified in the outline.

6-Weeks Prior To Monitoring:

- SBCTC to Send out Intent to Monitor Notification to Include:

- Program & Fiscal Questionnaire
- Due Date

4-Weeks Prior To Monitoring:

- SBCTC to Send out 4-week Monitoring Notification:
  - Zoom Link for Virtual Monitoring Visit OR Request for Campus Meeting Room
  - Program & Fiscal Compliance Checklist
  - Restricted SharePoint Link to access the list of students selected for review
  - SharePoint Links to upload the Questionnaire, Program Documentation, and Fiscal Documentation, as indicated in the Monitoring Document Checklist
  - Monitoring Document Checklist including program and student file documents for submission and review
- College prepares student files for upload:
  - Program Application
  - DSHS Consent Form
  - Most Recent Academic Plan
  - Quarterly Class Schedule with Program of Study and credits
    - QCS_SR_CRSENR_BY_STUGRP
      - This will show enrollments for student group selected and should include enrollment and career/program information--please filter to include requested students only
  - Attendance Sheets for period of review
  - Student Support Funds Request Form
  - Work Study Documentation
- College prepares fiscal files from the indicated invoice period for upload:
  - All Student Support Funds Request Forms
  - Budget Activity Reports for WF for the period selected:
    - QFS_GL_ACCOUNT_ANALYSIS (General Ledger)
      - This will show all expenses for the period selected
    - QCS_SF_STDNT_ACCOUNT_DTL
      - This will pull student account details and can be filtered by item types and date ranges
  - For all employees listed in your WorkFirst grant as paid through WorkFirst, for the selected period:
    - Payroll Reports: QHC_PY_PAYROLL_BY_DEPT
    - Time and Efforts
  - WorkFirst Calculation Spreadsheet – any internal worksheets used to calculate and/or track the monthly invoice

2-Weeks Prior To Monitoring:

- Student File Contents Due – upload using the link provided in the Monitoring Notification
- Fiscal File Contents Due– upload using the link provided in the Monitoring Notification
- College Program & Fiscal Questionnaire Due– upload using the link provided in the Monitoring Notification

1-Week Prior To Monitoring:

- SBCTC Conducts Review:
  - Program & Fiscal Questionnaire
  - Non-Disclosures
  - Program and Fiscal Contents
  - eJAS Review

Day of Monitoring:

- On campus or virtual meeting (via Zoom) with college staff:
  - Introductions
    - SBCTC and College Staff
  - Review of monitoring process and answer any initial questions
  - Conduct interview following the Program & Fiscal Compliance Checklist
    - Ask clarifying questions on processes
    - SBCTC Observations
    - Provide technical assistance and answer any questions from college staff
  - Conclude Interview:
    - Review Commendations, Recommendations, and any Corrective Action Items with staff

2 to 4 Weeks after Monitoring:

- Monitoring Analysis Summary is written and sent

30 Days after Findings Letter:

- Corrective Action Plan Due

60-90 Days after Monitoring:

- Schedule Follow-Ups for Any Corrective Action Plan

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.

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

Confidentiality and Records

Maintaining Confidentiality

Confidential information must not be used, published, transferred, sold or otherwise disclosed. When transmitting any confidential information, secure email MUST be used. The Student Supports Program Canvas Community > Student Support Tools and Websites Module > Email Encryption | Sending and Receiving Confidential Information page includes step-by-step instructions for determining if information should be send by secure email, and how to send information over secure email. Please contact StudentSupport@sbctc.edu to be added to the Canvas Community if you do not have access.

Data Security

Grant recipients must adhere to Appendix C: Data Security Requirements.

Grant recipients, their employees, volunteers, etc., must also adhere to the eJAS nondisclosure provisions as described on the eJAS nondisclosure form. You can locate the eJAS nondisclosure forms in the Student Supports Program Canvas Community > Student Support Tools and Websites Module > Electronic Jobs Automated System (eJAS) page. The page also describes which staff need to complete the eJAS nondisclosure form. Please contact StudentSupport@sbctc.edu to be added to the Canvas Community if you do not have access.

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.

Notice of Non-Disclosure

All employees with access to client information must have an up-to-date Confidential Information, Fraud and Abuse form (DSHS 03-374E - Rev. 11/2014). Employees that require access to eJAS must also complete the request for access at the bottom of this form. This form must be updated for each employee in February of each grant year and sent to the SBCTC. You can locate the eJAS nondisclosure forms in the Student Supports Program Canvas Community > Student Support Tools and Websites Module > Electronic Jobs Automated System (eJAS) page. The page also describes

which staff need to complete the eJAS nondisclosure form. Please contact StudentSupport@sbctc.edu to be added to the Canvas Community if you do not have access.

Maintenance of Records

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

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)

Fiscal 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.

Notification of Compromise or Potential Compromise

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

Fraud Reporting

Any knowledge of welfare fraud must be reported to DSHS by calling 1-800-562-6906 or online here.

The DSHS fraud reporting number, 1-800-562-6906, must be posted in staff offices for ease of access by staff and employees.

Program Resources and Support: Canvas Community

The Student Supports Programs Canvas Community is SBCTC's hub for WorkFirst program resources, system messages, trainings, and other events. It serves the same purpose for these

Student Support Programs: Basic Food Employment and Training (BFET), Opportunity Grant (OG), Student Emergency Assistance Grant Program (SEAG), Supporting Students Experiencing Homelessness (SSEH), Benefits Navigators and Campus Basic Needs Strategic Plans.

For general Canvas questions or to be added to the Canvas community, email studentsupport@sbctc.edu. In your email, include which Student Support Programs you work in.

We encourage WorkFirst program staff and administrators to request access to the Canvas Community and the WorkFirst-specific group for important program notifications as well as access to supplemental training resources and topical programs guides available in the WorkFirst module.

Student Support Programs Contact List

The Student Support Programs Contact List is an up-to-date email & phone contact list for WA CTC system employees working within the Student Support Programs. It's available for college staff to review and request updates to at any time in the Canvas Community on the SSP Contact List Canvas page. You'll need to have access to the SSP Canvas Community and be logged into your Canvas account in order to access the SSP Contact List Canvas page. See the above section with information on the SSP Canvas to learn how to gain access to the SSP Canvas Community.

SBCTC SSP employees use the Role columns in the SSP Contact List to connect with CTC staff based on their role in a program - for example, monitoring emails, WorkFirst Attendance Verification request emails, or questions about budget revisions and invoices.

CTC staff are encouraged to use the contact list to learn which SSP colleagues are in roles similar to theirs across the WA CTC system. You can reference the list to find contact information for your counterparts doing similar work at other WA CTCs, and connect with those staff for networking, best practice sharing, cross-college collaboration, community building, and more. Information regarding how to navigate, use, and update the list is available on the SSP Contact List Canvas page.

Budget & Invoicing Guidance

Budget Activities

The following list identifies all eligible WorkFirst program components by activity (also known as a budget line or line item). eJAS component codes, where applicable, are in parentheses.

Work-Based Learning/WorkFirst Work Study (WBL/WFWS)

Costs associated with paid (PT) or unpaid (WE) work experience or internships done in conjunction with training. This activity must be budgeted at or above the earmarked total for each college as approved by SBCTC at the time of application or after a funding survey. Earmarked totals can only be changed during a funding survey, and colleges in the first or second year of take back cannot change their earmarked totals until the first funding survey of the fiscal year, after the take back process is completed.

Vocational Education

Costs associated with tuition, books, and fees required for enrollment in approved education and

training activities for students in VE, DC, PE or JT components. See the Approved Activities for SBCTC Providers section for activity definitions and eligibility.

Costs associated with direct student support services (a.k.a. direct student case management) for students in vocational education activities (VE, DC, PE or JT).

To qualify as a PE or VE the vocational program must have an associated vocational Plan Code.

WorkFirst Internal Controls

Costs associated with identifying, documenting, and reporting monthly participation hours for WorkFirst students. This is a required function of the WorkFirst program and staffing efforts and expenses must be reflected here unless this requirement is funded with non-WorkFirst funds. Only include direct service costs (working directly with or directly on behalf of specific students) in this budget activity. Non-direct service costs must be budgeted in the Administration activity.

Life Skills

Costs associated with delivery of Life Skills (LS) activities as defined in the WorkFirst Handbook (e.g., assessment, curriculum design, or instruction).

Basic Skills

Costs associated with providing basic education (GE/BE/HS/ES), including Basic Education for Adults courses, high school completion, English Language Acquisition, high school equivalency (HSE) examination preparation, and High School + programs.

If you use grant funds to cover the $25 basic skills tuition, budget that in the tuition category of the Basic Skills line.

Tracking & Monitoring

Salaries and benefits costs of personnel who develop, maintain, and support information technology or computer systems used for tracking and monitoring.

This does not include monitoring and tracking done by a data entry clerk, statistician, report writer, or institutional researcher.

Examples:

- Paying a programmer to design a system to track outcomes
- Staff costs associated with providing maintenance on a server that stores WorkFirst data, etc.

Student Supports

Costs associated with vocational education (VE, DC, JT, and PE), Basic Education (BE, GE, HS, and ES), life skills (LS) and paid (PT, FT) or unpaid (WE) work experience or internships are allowable in conjunction with training. Student Support Funds are restricted to $5000 per student, per program year and according to the activity the participant is involved in. All expenses should be related to training or required by the training and/or educational program.

This activity must be budgeted at or above the earmarked total for each college as approved by

SBCTC at the time of application or after a funding survey. Earmarked totals can only be changed during a funding survey, and colleges in the first or second year of take back cannot change their earmarked totals until the first funding survey of the fiscal year, after the take back process is completed.

Administration

Administration is defined as activities necessary for the proper and efficient performance of eligible recipient's duties under this grant, including oversight and supervision.

No more than 15% of your grant may be used for administrative purposes including approved indirect costs.

Indirect may be budgeted at no more than 5% of the salaries budgeted (excluding WorkFirst Work Study student salaries). However, indirect charges must be based on actual indirect salary expenses. The allowable variance of 10% per budget cell does not apply to budgeted amounts in the Administration activity.

Administration duties include but are not limited to:

- Preparation and monitoring of program plans, budgets, schedules, proposals, reports, purchasing, etc.
- Creating process, supervising operations, verifying documentation, research, and tracking reports associated with reported monthly participation for TANF parents.
- Tracking and monitoring costs associated with a data entry clerk, statistician, report writer, or researcher.
- Costs related to staff and interagency meetings (ex. LPA meetings) on such topics as referrals, systems, and planning, which are not specifically about individual students.
- Staff training related to administration activities.
- Services related to accounting, litigation, audits, and management of property, payroll, and personnel.
- Costs for the goods and services required for administration of the program, such as the costs for supplies, equipment, travel, postage, utilities, rental of office space, and maintenance of office space
- Travel costs associated with program administration staff duties.
- Management information systems not related to the tracking and monitoring of WorkFirst (TANF) requirements, such as personnel and payroll.
- Indirect costs.

Budget Categories

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

Salaries, Wages, and Benefits

Salaries, wages, and benefits associated with grant activities.

Include the following in your budget narrative:

1. All position titles to be funded by the grant.
2. Percentages of effort, full-time equivalent faculty (FTEF), full-time equivalent staff (FTE), or hourly wage information and benefits for each position to be funded from the grant. See Appendix D for more information on how to calculate FTE/FTEF.
3. A brief description of duties by position as they relate to the grant.

Please put each position on a new line of text.

Examples (Instructional):

- WorkFirst Director, 10% FTE = Salary 8,000, Benefits = 2,500, assists students in developing educational plans and provides ongoing retention support
- Program Assistant, 200 hrs @ $16/hr = Salaries 3,200, Benefits 1,000, assists students with Basic Skills activities
- Basic Skills Instructor, 1.0 FTEF = Salary $60,000, Benefits $24,000., provides instruction to WorkFirst Basic Skills students
- 2 faculty stipends at $500 each for curriculum development

Example (Administration):

- WorkFirst Director, 5% FTE = Salary 4,000, Benefits = 1,250, oversees budget and personnel, attends Local Planning Area (LPA) meetings on behalf of program

Student Worker Salaries, Wages, and Benefits

Salaries, wages, and benefits associated with WorkFirst Work Study student workers,

Include the following in your budget narrative:

- Number of positions to be funded by the grant.
- Hourly wage information and benefits for each position to be funded from the grant.

Examples (WFWS):

- 20 WorkFirst Work Study student slots (2 slots for Summer and 6 slots each for Fall, Winter, Spring), $4,104 estimated quarterly wages per slot ($18/hr average wage x 19 hours/week x 12 weeks/quarter)

Goods and Services

Goods and Services to be used by personnel budgeted to grant and other necessary goods and services needed for instruction. Note that Goods and Services should be attributed to the appropriate Budget Activity related to their intended use (Administration, Vocational Education, Life Skills, etc.).

Examples: classroom supplies, assessment materials, printing, telephone, postage, copying and fax, equipment (less than an individual or group acquisition costs of $10,000 or a useful life of less than one year), utilities, copy machine rentals/leases, registration fees, and interagency agreements (contracts between two or more public entities).

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

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

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

Building Rental & Utilization

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

Example: Rental of classroom space at XYZ Community Building - rent calculated below FMV.

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 using state funds, the same OFM travel rates and regulations must be applied.

Examples: Travel to meetings directly related to WorkFirst students, travel to grant-related meetings, travel to professional development activities

Contracts

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

Examples: Contracted personnel as subject-specific speakers for students, contracted trainer to provide professional development for WorkFirst faculty or staff

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

Capital Assets

Capital assets are defined as property or equipment with a useful life in excess of one (1) year and a per unit acquisition cost of $10,000 or more. Equipment purchased with grant funds shall remain the property of the grant recipient and their inventory control. ***All capital assets purchased with funds from this grant must be approved by the SBCTC prior to purchase.***

Items with a per unit cost of $10,000 or more must typically be "special purpose" equipment. Funds from this grant can't typically be used to purchase general purpose items with a per unit cost of $10,000 or more.

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

Tuition, Books, and Student Fees

WorkFirst grant funds can pay for tuition, books, and fees at your college/organization for eligible WorkFirst students. Tuition and fees may not be dispersed directly to a student.

Graduation application and transcript fees are an allowable cost if the fees are not included in the college's overall tuition costs. Background check fees required for enrollment into a class or program are an allowable cost attributed to this budget category.

Summer Quarter Tuition: If paying tuition from WorkFirst Delivery Agreement grant funds, colleges must bill the tuition to the grant in the fiscal year in which college policy states that tuition is due. For example, if summer quarter starts July 2, 2026, but the student registers on June 28, 2026, and college policy states that tuition is due at the time of registration, the college must bill tuition to the 2025-26 WorkFirst grant, not to the 2026-27 WorkFirst grant. However, if college policy states that tuition is due on the first day of class, the college must bill the tuition to the 2026-27 WorkFirst grant.

Summer Quarter Tuition Refunds: Any tuition refunds (due to students dropping, etc.) must be refunded to the grant from which they were originally paid. For example, if the college paid for summer quarter tuition (summer 2026) from their 2025-26 WorkFirst grant, the college must apply any tuition refunds to that grant. If the college has already submitted the final invoice to SBCTC for that grant, the college must mail a check to SBCTC for the refund(s). Please contact SBCTC for more information prior to mailing a check. Alternatively, if a college uses their 2026-27 grant to pay for summer quarter 2026 tuition, refunds can simply be deducted from a future invoice to SBCTC.

Indirect/Facilities and Administrative Costs (F&A)

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

To calculate the indirect/F&A amount, take the salary and wages from each budget activity (excluding WorkFirst Work Study salaries) and multiply that amount by 5%. This is the maximum amount that can be budgeted for indirect/F&A.

Indirect/F&A may be budgeted at no more than 5% of the salaries budgeted, excluding WorkFirst Work Study salaries. Indirect/F&A charges must be based on actual salary expenses. The allowable variance of 10% per budget cell does not apply to the amount budgeted in the indirect/F&A budget cell.

Example: 5% of salaries (less WFWS) ($193,900*.05) = $9,695

Student Supports Budget Categories

The following budget categories are only available/applicable for the Student Supports budget activity. For more information on allowable costs and suggested funding limits per student, please

see the Support Services for Participants section.

Student Support funds may be given directly to a student.

Tools

Costs associated with tools/kits and supplies required for a student's program or activity. All other students must have the same requirement for tools/kits.

Examples: nursing kits, welding tools.

Clothing

Costs associated with required uniforms/special clothing and personal protective equipment (PPE).

Examples: clothing, such as shoes, underclothing, and professional apparel necessary to seek or maintain employment and/or to participate in a work-like activity.

Emergency Costs

Costs associated with special accommodations.

Examples: internet services, computer equipment, and diapers/pull-ups, wipes and creams for child to attend daycare.

Personal Hygiene

Items needed to maintain personal appearance in order to accept employment and or work-like activity or participate in educational activity.

Examples: shampoo, soap, deodorant, laundry supplies.

Testing

Costs associated with aptitude, educational testing, credentials, certifications, and employment licensing.

Examples: assessment/placement testing, nursing license/testing, food handler's cards, CPR certifications.

Medical

Costs associated with medical exams, services necessary to accept employment or participate in educational activities that are NOT covered by Apple Health.

Examples: doctor's visits, physical exams, counseling services etc.

*Note: costs for counseling do not count towards the annual limits per participant. Costs for counseling include professional counseling and classes such as anger management.

Transportation

Costs associated with transportation needed to keep the participant engaged in their activities.

Examples: bus passes, van pool, train, ferry, and gas cards.

Car repair is an acceptable cost as long as repairs are necessary, and the participants submit a minimum of two itemized estimates from a licensed automobile mechanic. May only be for a vehicle that is owned by the participant.

Examples: brakes, water pump, timing belt, batteries, lights, tires, etc. License and fees are also an acceptable cost. This can include vehicle licensing, plates/tabs, fees for establishment/reestablishment of driver's license, emissions testing, and title transfer. Unallowable costs are traffic tickets, fines, penalties, and collection charges.

Budget Revisions

SBCTC approval of a revised budget is required if there is more than a 10% variation in expenditure levels for any individual budget cell. Indirect costs cannot exceed the amount budgeted. If you are moving funds to/from administration budget categories, you will need to adjust your indirect budget to stay within the allowable 15%.

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

OBIS will not allow a budget revision and invoice to be submitted at the same time. If you need to revise your budget to bill for expenses, you will need to submit a budget revision prior to submitting your invoice. Please ensure your budget revision is submitted prior to the invoice deadline.

Final budget revision deadline: June 15, 2027

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

Budget Revisions to Earmarked Funds

Colleges can view their WorkFirst earmark amounts in three places:

- Initial grant earmarks: In the Grant Resources tab of OGMS.
- Post funding survey completion: In OBIS.
- Post funding survey completion: In the SSP Canvas.

Funds can be added to budget cells above the earmarked amounts (i.e., WorkFirst Work Study and Student Support Funds) through a budget revision at any time. The SBCTC reserves the right to scale requests to add additional funds beyond a college's earmarked amount. This does not constitute a formal increase to the earmarked amount. Earmarked amounts can only be increased or decreased through an approved funding survey request. Funds from an earmarked amount cannot be reduced below the earmarked amount other than through an approved funding survey request.

Funds earmarked for the Student Supports budget activity can be transferred across budget categories (i.e., tools, clothing, emergency costs, etc.) through a budget revision, but cannot be transferred out of the Student Supports budget activity if this would result in an unapproved decrease to earmarked funds.

Funds earmarked for the Work-Based Learning budget activity can be transferred across budget

categories (i.e., salaries, benefits, goods and services, etc.) through a budget revision, but cannot be transferred out of the Student Supports budget activity if this would result in an unapproved decrease to earmarked funds.

Examples:

- College A's Student Support Funds earmarked total is $34,745. College A moves $1,000 from the Vocational Education Tuition budget category to the SSF Transportation budget category. College A's Student Support Funds earmarked total is still $34,745 because its SSF earmarked total can only be increased or decreased through an approved funding survey request. College A's SSF budget is $35,745.
- College B's Work Based Learning earmarked total is $50,000. College B requests and receives $1,000 for WBL Goods and Services in the Fall funding survey. After completion of the required budget revision in OBIS, College B's Work Based Learning earmarked total is $51,000.
- College C's Student Support Funds earmarked total is $40,000. Through a budget revision during winter, College C moved $2,000 from its Vocational Education Tuition budget category to the SSF Tools budget category. College C's SSF budget is $42,000 and its SSF earmarked total is $40,000. College C requests and receives $3,000 for its SSF Emergency Costs budget category in the Spring funding survey.

  After completion of the required budget revision in OBIS, College C's Student Support Funds earmarked total is $43,000. College C's SSF budget is $45,000. The winter move of funds from VE Tuition to SSF Tools does not constitute a formal increase to the earmarked amount.
- College D's Work Based Learning earmarked total is $100,000. College D requests a move of $5,000 from Work Based Learning Salaries and Wages to WorkFirst Internal Controls Salaries and Wages. The request is denied by the SBCTC because this would be an unapproved decrease to College D's earmarked total for WBL; College D's earmarked total for WBL is $100,000, and the funding move would reduce the line to $95,000.

Funding Surveys

The SBCTC conducts funding surveys during the fiscal year to move undedicated funds to those colleges demonstrating need. Grant recipients are required to complete each funding survey by the designated due date and return any unspent funds.

The SBCTC may scale funding survey returns or requests to maintain contractually required earmark levels across the WA CTC system. Colleges in the first or second year of take back cannot change their earmarked totals until the first funding survey of the fiscal year, after the take back process is completed.

Required budget revisions resulting from funding survey may not include additional revisions. Once your required budget revisions are approved, you may submit additional budget revisions.

Indirect and Administration Funding Survey Adjustments

Colleges should return undedicated funds that they do not project they will utilize during funding surveys. A college that proposes to return undedicated funds in a funding survey may need to

adjust its indirect/F&A budget category and/or its Administration budget activity, depending on the type and amount of funds it proposes to return.

Indirect

A college may need to adjust its indirect budget category if it returns salaries during a funding survey. Indirect/F&A may be budgeted at no more than 5% of the salaries budgeted, excluding WorkFirst Work Study salaries. Before submitting a funding survey with a proposed return of salaries, check to ensure that the indirect/F&A budget activity is budgeted at no more than 5% of salaries budgeted, excluding WFWS salaries.

Administration

A college may need to adjust its Administration budget activity in the event that it returns any amount of funds during a funding survey. No more than 15% of the WF grant may be used for administrative purposes including approved indirect costs. Before submitting a funding survey with a proposed return of funds, check to ensure that the Administration budget activity is budgeted at no more than 15% of the total WF grant.

Earmarked Fund Increases & Decreases

Earmarked funds (WorkFirst Work Study and Student Support Funds) may only be increased or decreased through an approved funding survey request. An approved request to add funds to either of the earmarked funds during a funding survey will result in an increase in the college's earmarked amounts. Note that the request must be approved for the increase or decrease to change the college's earmarked amounts.

Example:

- College E's Student Support Funds earmarked total is $34,745 prior to the fall funding survey. In the summer, College E moved $2,000 into Student Support Funds Medical, changing the Student Support Funds budget to $36,745; the earmarked total remains $34,745. In the fall funding survey, College E requests $2,000 additional funds for Student Support Funds Personal Hygiene. The college's request is approved. The college's Student Support Funds earmarked total is now $36,745 while its Student Support Funds budget is $38,745.

Invoicing

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

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

If the college is unable to meet the invoice deadline, to avoid issues with submission and potential monitoring or audit findings, an email outlining the reason for the delay and intended submission date must be sent to the current WorkFirst Program Administrator and Denise Costello at dcostello@sbctc.edu ***prior*** to the invoice deadline. The SBCTC will respond with specific instructions for submission of the invoice past the deadline.

For expenses incurred	Invoice no later than
July	August 31, 2026
August	February 30, 2026
February	October 31, 2026
October	November 30, 2026
November	December 31, 2026
December	January 31, 2027
January	February 28, 2027
February	March 31, 2027
March	April 30, 2027
April	May 31, 2027
May	June 30, 2027
June	July 15, 2027

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

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

Grant Terms & Information

General

Funds under this grant are provided to the State Board of Community and Technical Colleges (SBCTC) through a contract between SBCTC and the Washington State Department of Social and Health Services (DSHS). The awards are federal funds, provided by the U.S. Department of Health and Human Services, through the Temporary Assistance for Needy Families Program (TANF, known as WorkFirst in Washington State) of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, under Assistance Listing/CFDA 93.558.

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

Colleges receiving grants from Federal funds will be required to certify that they have done reviews of funded programs for compliance with Federal Civil Rights Laws. Documentation of these reviews must be provided to SBCTC upon request.

Allowable Costs

All expenditures submitted for reimbursement under this grant must be necessary and reasonable

for proper and efficient administration of the WorkFirst program.

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

The following state and federal regulations must be followed:

Applicable Washington State Regulations

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

Applicable Uniform Administrative Requirements, Cost principles, and Audit Requirements for Federal Awards (Federal)

2 CFR Title 2, Chapter II, Part 200

Grantees must not use federal funds under this project in any manner that violates the United States Constitution, Title VI or Title VII of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq. or 42 U.S.C. § 2000e et seq.), Title IX of the Education Amendments of 1972 (20 U.S.C. § 1681 et seq.), section 504 of the Rehabilitation Act (29 U.S.C. § 794), the Age Discrimination Act of 1975 (42 U.S.C. 6101 et seq.), Title II of the Americans with Disabilities Act of 1990 (42 U.S.C. § 12131 et seq.), or other applicable federal law.

Capital Assets

Capital assets are defined as any item with a useful life in excess of one year and a per unit cost of $10,000 or more. (This is the federal definition of "equipment.")

All capital assets purchased with funds from this grant must be approved by the SBCTC prior to purchase. If specific capital assets are not included on your original grant budget, please submit a budget revision through OBIS for approval prior to purchase.

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

*Items with a per unit cost of $10,000 or more must typically be "special purpose" equipment. Funds from this grant typically can't be used to purchase general purpose items with a per unit cost of $10,000 or more. Definitions from 2 CFR 200.1 are:

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

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

Purchased Items – Tracking

All non-consumable items purchased with grant funds shall remain the property of the grant recipient. "Small and attractive" items and items with a per unit acquisition of $10,000 or more and a useful life in excess of one year must be under inventory control.

Purchased Items – Disposal of Items

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

Equipment (Capital Assets):

When a grant recipient's WorkFirst program no longer has a use for equipment that had an original per unit acquisition cost of $10,000 or more and a useful life in excess of one year, they may be offered to another federal program at the recipient's college at no cost.

2 CFR 200.313 (c)(1):

When no longer needed for the original program or project, the equipment may be used in other activities supported by the Federal awarding agency, in the following order of priority:
(i) Activities under a Federal award from the Federal awarding agency which funded the original program or project, then (ii) Activities under Federal awards from other Federal awarding agencies. This includes consolidated equipment for information technology systems.

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

Per 2 CFR 200.313 (e)(2), if a grant recipient no longer has a need for equipment purchased from a federal grant, the grant recipient must contact the federal agency where funding originates to request disposition instructions. SBCTC will assist with this. If the federal agency allows the grant recipient to sell the equipment and the current fair market value of the equipment is more than $10,000 per unit, the proceeds must be returned to the federal agency minus selling and handling expenses of $1,000 or 10% of the proceeds, whichever is less. Contact SBCTC for assistance.

Supplies:

Per 2 CFR 200.314, when a grant recipient's WorkFirst program no longer has a need for unused supplies with an aggregate value of more than $10,000, they may be offered to another federal program at the recipient's college at no cost. If the unused supplies are not needed for another federal program, they can be sold or retained for use on other activities. If the unused supplies are sold or used on non-federal activities, 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 at dcostello@sbctc.edu for assistance.

Unallowable Costs

The following costs are explicitly disallowed:

- Costs associated with determining WorkFirst eligibility of TANF students not referred by DSHS

- Costs for any students not eligible for WorkFirst. Eligible WorkFirst Students mean that they MUST be open on TANF, referred to your college's SBCTC-approved contractor code, have a component that is carried on your current contractor caseload, and currently enrolled in classes.

- Bad debt expenses (2 CFR 200.426)
- Payment to any person for influencing, or attempting to influence, an officer or employee of any agency, member of Congress, an officer or employee of Congress, or an employee of a member of Congress, in connection with the awarding of a federal contract, continuation, renewal, amendment, or modification of any federal contract, grant, loan, or cooperative agreement (2 CFR 200.450)
- Light refreshments (2 CFR 200.405(a)(3))
- Promotional items and memorabilia including, but not limited to tote bags, key chains, t-shirts, pens, magnets, etc. (2 CFR 200.421(e))
- Advertising costs that are not specifically related to the grant program (2 CFR 200.421(e))
- Commencement and convocation costs (2 CFR 200.429)
- Contributions and donations (2 CFR 200.434)
- Student activity costs unless specifically provided for in the grant award (2 CFR 200.469)
    - Support services are only allowed to be budgeted to the Student Supports line of the grant, based on SBCTC and DSHS policy. Support services include but are not limited to such items as: Student mileage; parking passes; license fees; public transportation (includes bus, van pool, train, ferry, etc.); clothing; tools or equipment purchased for and retained by the student; car repair; medical services; and personal hygiene items (please refer to Student Supports Budget Categories section for more details on allowable costs.)
    - However, an allowable activity for the Work-Based Learning, Vocational Education, Life Skills, or Basic Skills lines of the grant might include renting a van for the entire class for an instructional activity. The key is that the entire class, not just an individual, is getting to and from training.

Debarment and Suspension

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

Expenditure Accounting

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

For colleges these funds must be accounted for as a cost-reimbursement/as-incurred grant and contract (fund 145) along with any student enrollments generated with these funds. SBCTC

reimbursement for this grant must be coded to 4020120.

Set up this grant in ctcLInk using the following information:

Grant Type: As Incurred/Cost Reimbursable

Sponsor ID: FIN00107

CFDA/Assistance listing: As of FY27 - do NOT enter the CFDA/ALN number in ctcLink for grants from SBCTC.

F&A Distribution Department: 98219

F&A Rate Type: IND

F&A Base Budget: SALRY

FA Rate %: 5.00

Project Type: 02012

Fund: 145

Class: See NACUBO Code Section, below, for suggestions

Revenue Account: 4020120

Contract Asset Account: 1010180

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

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

NACUBO Code

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

- Work-Based Learning budget line: 161
- Vocational Education budget line: 164
- Internal Controls budget line: 165
- Life Skills budget line: 118
- Basic Skills budget line: 118
- Tracking & Monitoring budget line: 186
- Student Support budget line: 161
- Administration budget line: 143

Insurance

Non-state entities receiving grant funds must maintain insurance coverage as follows:

1. Commercial General Liability covering the risks of bodily injury (including death), property damage and personal injury, including coverage for contractual liability, with a limit of not less than $1 million per occurrence.

2. Grant recipients must at all times comply with all applicable workers' compensation, occupational disease, and occupational health and safety laws, statutes, and regulations to the full extent applicable. The state will not be held responsible in any way for claims filed by the grant recipient or their employees for services performed under the terms of this grant.

If the grant recipient will transport students, the grant recipient must also maintain the following:

1. Business Automobile Liability (owned, hired, or non-owned) covering the risks of bodily injury (including death) and property damage, including coverage for contractual liability, with a limit of not less than $1 million per accident.

All grant recipients must ensure that all sub-contractors maintain the minimum levels of insurance stated above.

Mandatory Disclosures

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

Participant Support

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

Program Income

Program income generated with grant funds must be deducted from the overall expenditures, reducing the amount that can be charged to the grant. For example, if a grant recipient generates $10,000 in program income from sources other than tuition and fees, the grant recipient must leave $10,000 of the grant unspent. This regulation can be found in the 2 CFR 200.307(e). Financial records related to program income must be retained by the agency and be available for audit.

An example of program income is a training program which operates an espresso stand and sells

products. The proceeds from these sales are considered to be program income.

Public Announcements, Disclosure of Federal Funding

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

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

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 Department of Social and Health Services. Materials shall include, but are not limited to, reports, documents, pamphlets, advertisements, books, magazines, surveys, studies, computer programs, films, tapes, and/or sound reproductions. Ownership includes the right to copyright, patent, register, and the ability to transfer these rights.

Supplanting

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

Termination

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

Termination for Cause

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

Savings

In the event funding from state, federal, or other sources is withdrawn, reduced, or limited in any way after the effective date of this contract and prior to normal completion, the SBCTC may

terminate the grant under the "Termination" clause, without the thirty-day notice requirement, subject to renegotiation at the SBCTC's discretion under those new funding limitations and conditions.

Time & Effort Reporting

Federal regulations under 2 CFR 200.430(i) require employees whose salaries are charged to a federal grant to keep time and/or effort reports to substantiate the charges. Additional time & effort reporting information may be found online.

Whistleblower Protections

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

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Appendix B: Academic Plan Sample

Name:
Student ID:
Date:
Program of Study:
Employment Goal:
Expected Graduation Date:

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

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

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

Created by:
Date:
Notes:

Appendix C: Data Security Requirements

The following are requirements for SBCTC Subcontractors & Subgrantees as determined in Special Terms and Conditions Exhibit A- Data Security Requirements of the contract between the Department of Social and Health Services and the State Board for Community and Technical Colleges.

Definitions

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

1. "AES" means the Advanced Encryption Standard, a specification of Federal Information Processing Standards Publications for the encryption of electronic data issued by the National Institute of Standards and Technology.

2. "Authorized Users(s)" means an individual or individuals with a business need to access DSHS Confidential Information, and who has or have been authorized to do so.

3. "Business Associate Agreement" means an agreement between DSHS and a contractor who is receiving Data covered under the Privacy and Security Rules of the Health Insurance Portability and Accountability Act of 1996. The agreement establishes permitted and required uses and disclosures of protected health information (PHI) in accordance with HIPAA requirements and provides obligations for business associates to safeguard the information.

4. "Category 4 Data" is data that is confidential and requires special handling due to statutes or regulations that require especially strict protection of the data and from which especially serious consequences may arise in the event of any compromise of such data. Data classified as Category 4 includes but is not limited to data protected by: the Health Insurance Portability and Accountability Act (HIPAA), Pub. L. 104-191 as amended by the Health Information Technology for Economic and Clinical Health Act of 2009 (HITECH), 45 CFR Parts 160 and 164; the Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. §1232g; 34 CFR Part 99; Internal Revenue Service Publication 1075; Substance Abuse and Mental Health Services Administration regulations on Confidentiality of Alcohol and Drug Abuse Patient Records, 42 CFR Part 2; and/or Criminal Justice Information Services, 28 CFR Part 20.

5. "Cloud" means data storage on servers hosted by an entity other than the Contractor and on a network outside the control of the Contractor. Physical storage of data in the cloud typically spans multiple servers and often multiple locations. Cloud storage can be divided between consumer grade storage for personal files and enterprise grade for companies and governmental entities. Examples of consumer grade storage would include iTunes, Dropbox, Box.com, and many other entities. Enterprise cloud vendors include Microsoft Azure, Amazon Web Services, and Rackspace.

6. "Encrypt" means to encode Confidential Information into a format that can only be read by those possessing a "key"; a password, digital certificate or other mechanism available only to authorized users. Encryption must use a key length of at least 256 bits for symmetric keys, or 2048 bits for asymmetric keys. When a symmetric key is used, the Advanced Encryption Standard (AES) must be used if available.

7. “FedRAMP” means the Federal Risk and Authorization Management Program, which is an assessment and authorization process that federal government agencies have been directed to use to ensure security is in place when accessing Cloud computing products and services.

8. “Hardened Password” means a string of at least eight characters containing at least three of the following four character classes: Uppercase alphabetic, lowercase alphabetic, numeral, and special characters such as an asterisk, ampersand, or exclamation point.

9. “Mobile Device” means a computing device, typically smaller than a notebook, which runs a mobile operating system, such as iOS, Android, or Windows Phone. Mobile Devices include smart phones, most tablets, and other form factors.

10. “Multi-factor Authentication” means controlling access to computers and other IT resources by requiring two or more pieces of evidence that the user is who they claim to be. These pieces of evidence consist of something the user knows, such as a password or PIN; something the user has such as a key card, smart card, or physical token; and something the user is, a biometric identifier such as a fingerprint, facial scan, or retinal scan. “PIN” means a personal identification number, a series of numbers which act as a password for a device. Since PINs are typically only four to six characters, PINs are usually used in conjunction with another factor of authentication, such as a fingerprint.

11. “Portable Device” means any computing device with a small form factor, designed to be transported from place to place. Portable devices are primarily battery powered devices with base computing resources in the form of a processor, memory, storage, and network access. Examples include, but are not limited to, mobile phones, tablets, and laptops. Mobile Device is a subset of Portable Device.

12. “Portable Media” means any machine readable media that may routinely be stored or moved independently of computing devices. Examples include magnetic tapes, optical discs (CDs or DVDs), flash memory (thumb drive) devices, external hard drives, and internal hard drives that have been removed from a computing device.

13. “Secure Area” means an area to which only authorized representatives of the entity possessing the Confidential Information have access, and access is controlled through use of a key, card key, combination lock, or comparable mechanism. Secure Areas may include buildings, rooms or locked storage containers (such as a filing cabinet or desk drawer) within a room, as long as access to the Confidential Information is not available to unauthorized personnel. In otherwise Secure Areas, such as an office with restricted access, the Data must be secured in such a way as to prevent access by non-authorized staff such as janitorial or facility security staff, when authorized Contractor staff are not present to ensure that non-authorized staff cannot access it.

14. “Trusted Network” means a network operated and maintained by the Contractor, which includes security controls sufficient to protect DSHS Data on that network. Controls would include a firewall between any other networks, access control lists on networking devices such as routers and switches, and other such mechanisms which protect the confidentiality, integrity, and availability of the Data.

15. “Unique User ID” means a string of characters that identifies a specific user and which, in conjunction with a password, passphrase or other mechanism, authenticates a user to an information system.

Authority

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

Administrative Controls

The Contractor must have the following controls in place:

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

Authorization, Authentication, and Access

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

1. Have documented policies and procedures governing access to systems with the shared Data.
2. Restrict access through administrative, physical, and technical controls to authorized staff.
3. Ensure that user accounts are unique and that any given user account logon ID and password combination is known only to the one employee to whom that account is assigned. For purposes of non-repudiation, it must always be possible to determine which employee performed a given action on a system housing the Data based solely on the logon ID used to perform the action.
4. Ensure that only authorized users are capable of accessing the Data.
5. Ensure that an employee's access to the Data is removed immediately:
   A. Upon suspected compromise of the user credentials.
   B. When their employment, or the contract under which the Data is made available to them, is terminated.
   C. When they no longer need access to the Data to fulfill the requirements of the contract.
6. Have a process to periodically review and verify that only authorized users have access to systems containing DSHS Confidential Information.
7. When accessing the Data from within the Contractor's network (the Data stays within the

Contractor's network at all times), enforce password and logon requirements for users within the Contractor's network, including:

A. A minimum length of 8 characters, and containing at least three of the following character classes: uppercase letters, lowercase letters, numerals, and special characters such as an asterisk, ampersand, or exclamation point.

B. That a password does not contain a user's name, logon ID, or any form of their full name.

C. That a password does not consist of a single dictionary word. A password may be formed as a passphrase which consists of multiple dictionary words.

D. That passwords are significantly different from the previous four passwords. Passwords that increment by simply adding a number are not considered significantly different.

8. When accessing Confidential Information from an external location (the Data will traverse the Internet or otherwise travel outside the Contractor's network), mitigate risk and enforce password and logon requirements for users by employing measures including:

A. Ensuring mitigations applied to the system don't allow end-user modification.

B. Not allowing the use of dial-up connections.

C. Using industry standard protocols and solutions for remote access. Examples would include RADIUS and Citrix.

D. Encrypting all remote access traffic from the external workstation to Trusted Network or to a component within the Trusted Network. The traffic must be encrypted at all times while traversing any network, including the Internet, which is not a Trusted Network.

E. Ensuring that the remote access system prompts for re-authentication or performs automated session termination after no more than 30 minutes of inactivity.

F. Ensuring use of Multi-factor Authentication to connect from the external end point to the internal end point.

9. Passwords or PIN codes may meet a lesser standard if used in conjunction with another authentication mechanism, such as a biometric (fingerprint, face recognition, iris scan) or token (software, hardware, smart card, etc.) in that case:

A. The PIN or password must be at least 5 letters or numbers when used in conjunction with at least one other authentication factor

B. Must not be comprised of all the same letter or number (11111, 22222, aaaaa, would not be acceptable)

C. Must not contain a "run" of three or more consecutive numbers (12398, 98743 would not be acceptable)

10. If the contract specifically allows for the storage of Confidential Information on a 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 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 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:

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

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 D: How to Calculate FTE & FTEF

Why Are Accurate FTE and FTEF Calculations Necessary?

Grant expenses must be "necessary and reasonable." You must provide some type of salary breakdown for us to determine that the budgeted cost is reasonable. The budget narrative amounts must agree with the dollar amounts entered in the salary/wages and benefits budget boxes.

What are FTE and FTEF?

FTE is *f*ull-*t*ime *e*quivalent staff. The plural is "FTEs" (with a lower case "s").

FTEF is *f*ull-*t*ime *e*quivalent *f*aculty.

Note: FTES = *f*ull-*t*ime *e*quivalent *s*tudent. 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

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

Example of Calculating FTE (staff) and/or FTEF (faculty):

Ex. 1) $10,000 budgeted for a part-time office assistant/adjunct faculty ÷ $50,000 annual full-time salary for this position at your organization = a total of .20 FTE/FTEF office assistant/adjunct faculty paid from this grant.

Pt Office Assistant - $10,000 ÷ $50,000 = .20 FTE

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

$60,000 x 75% FTE/FTEF = $45,000

Ex. 3) Salary allocation for a grant administrator is $80,000. The annual salary for this position is $160,000. Annual FTE for this position Is calculated by dividing $80,000 by $160,000. Double check by multiplying the calculated FTE by the annual salary for this administrative position.

$80,000 ÷ $160,000 = .50 FTE

More Examples & Explanations

Acceptable Budget Narrative:

Salary Budget: $15,000 Benefits Budget: $3000

Narrative Description:

PT Program Assistant: .30FTE = $15,000 salary and $3,000 benefits. Provides CTE data entry support.

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

Unacceptable Budget Narrative:

Budget amount: $10,000

Narrative description: Part-time staff to provide data entry

Without knowing how many staff, what kind of staff, and the total percentage 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.

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

Narrative Description: Program Assistant: $1,200 Wages for approx. 60 hrs. at $20/hr., and Benefits $250. Provides data entry support.

SBCTC can determine that dollar amount is reasonable and accurate.

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Washington State Board for Community and Technical Colleges