

# **Guidelines, Definitions and Reasonable Standards for Strong Workforce Funding Investment**

*(Local and Regional Share)*

## **Reasonable**

Reasonable is defined by the dictionary as: agreeable to sound judgment, not exceeding the limit prescribed by reason (not excessive), moderate in price, and a rational decision. Systems that can guide this definition are: necessary for the performance of the funding; follow sound business practices (procurement processes, follow state and local laws, follow the terms of the funding source); use of fair market prices; acting with prudence under the circumstances; and having no significant deviation from established prices.

The following, directly relate to Strong Workforce Education Code Requirements and some examples of the standard non-allowable activities that meet the "front-page of the newspaper" test of reasonable and the allowable indirect cost rate:

- **Supplanting:** Funds appropriated to community college districts for local or regional share investment shall supplement, not supplant, existing funding of community college career technical education programs. This shall not be interpreted to mean that a participating community college district is prohibited from eliminating or altering existing programs, but the percentage of that community college district's total full-time equivalent students enrolled in career technical education courses relative to the total full-time equivalent students enrolled in the district shall not be reduced from the percentage computed for the 2015–16 fiscal year. *[EC§88824(e)]*
- **Funding CTE Only:** Funds expended must show a direct benefit to the requirements of the Strong Workforce Program outcomes of increasing the number of quality students or programs in CTE courses programs and pathways and addressing the recommendations of the Strong Workforce Task Force. *[EC§88824(d)(5)(A-C)]*
- **Duplication of Effort:** To avoid duplication of effort, activities funded under the Strong Workforce Program shall be informed by, aligned with, and expand upon the activities of existing workforce and education regional partnerships, including those partnership activities that pertain to regional planning efforts established pursuant to the federal Workforce Innovation and Opportunity Act (Public Law 113-128), adult education block grant consortia, and K-12 career technical education programs. *[EC§88821(4)(d)]*
- **District Procedures:** All fiscal policy and program procedures adopted by the applicable Community College District shall be followed when expending (local and regional) allocations.

- **Non-Allowable Activities:**

***Entertainment*** – Costs of entertainment, including amusement, diversion, and social activities and any costs directly associated with such costs (such as tickets to shows or sports events, meals, lodging, rentals, transportation, and gratuities) are unallowable.

***Alcoholic Beverages*** – Costs of alcoholic beverages are unallowable.

***Contingency*** (Rainy Day Funds) – Contributions to a contingency reserve or any similar provision made for events the occurrence of which cannot be foretold with certainty as to time, intensity, or with an assurance of their happening, are unallowable.

***Goods and Services for Personal Use*** – Cost of goods and services for Personal use is unallowable.

***Lobbying*** – Lobbying is never allowed unless it meets the following criteria: (1) Technical and factual presentations on topics directly related to the performance of a grant, contract, or other agreement (through hearing testimony, statements, or letters to the Congress or a State legislature, or subdivision, member, or cognizant staff member thereof), in response to a documented request (including a Congressional Record notice requesting testimony or statements for the record at a regularly scheduled hearing) made by the recipient member, legislative body or subdivision, or a cognizant staff member thereof, provided such information is readily obtainable and can be readily put in deliverable form, and further provided that costs under this section for travel, lodging or meals are unallowable unless incurred to offer testimony at a regularly scheduled Congressional hearing pursuant to a written request for such presentation made by the Chairman or Ranking Minority Member of the Committee or Subcommittee conducting such hearings.

***Contributions or Donations*** – Cash or property contributions or donations are unallowable.

***Fund Raising and Investment Costs*** – Costs of organized fund raising, including financial campaigns, solicitation of gifts and bequests, and similar expenses incurred to raise capital or obtain contributions are unallowable, regardless of the purpose for which the funds will be used.

***Indirect Cost Rates Allowed***

<b>Allocation</b>	<b>Indirect Cost Rate (Total Direct Costs)</b>
<b>60% Local Share</b>	4%
<b>40% Regional Share</b> (5%) Fiscal Agent/Regional Consortium (95%) District	No Indirect Cost Allowed 4%

The following table can be used as a quick reference guide for participation requirements and/or plan requirements as listed within Division 7, Title 3 Education Code Section 88820-88826 (Strong Workforce Program) guidelines. This table is not meant to substitute a full review of Division 7, Title 3 Education Code Section 88820-88826 (Strong Workforce Program) guidelines in their entirety in addition to all recommendations from the Strong Workforce Task Force. Links to the above mentioned documents and documents that are designed to inform in the development of these investments can be found at:

<http://doingwhatmatters.cccco.edu/StrongWorkforce.aspx>

Recipients of Local or Regional Share Funding Shall	Plans for Local or Regional Share Funding Shall Address
<p><b>Be a member of a consortium</b> [EC§88824(d)(1)]</p> <p>(Career Technical Education Regional Consortium,” or “consortium,” means an administrative grouping of community college districts by the Division of Workforce and Economic Development of the chancellor’s office for the purpose of coordination and joint planning within regions, as defined in subdivision [EC88822§(c)])</p>	<p>Increasing the number of student in quality career technical education courses, programs, and pathways that will achieve successful workforce outcomes. [EC§88824(d)(5)(A)]</p>
<p><b>Work with other members of the consortium to create and submit a plan to the chancellor by January 31, 2017</b> [EC§88824 (d)(2)], for inclusion in the submissions of regional plans for purposes of the program and the federal Workforce Innovation and Opportunity Act (Public Law 113-128).</p>	<p>Increasing the number of quality career technical education courses, programs, and pathways that lead to successful workforce outcomes, or invest in new or emerging career technical education courses, programs, and pathways that may become operative in subsequent years and are likely to lead to successful workforce outcomes (completions, transfer, employment rates, employment in a field of study, earning, median change in earning, proportion of student who attained living wages). [EC§88824(d)(5)(B)]</p>
<p><b>Collaborate:</b> [EC§88821(a-e)] All Community College Districts participating in local or regional investments are required to follow collaboration requirements as specified in these sections.</p>	<p>Address recommendations from the Strong Workforce Task Force, including the recommended provision of student services related to career exploration, job readiness and job placement, and work-based learning. [EC§88824(d)(5)(C)]</p> <p><a href="http://doingwhatmatters.cccco.edu/portals/6/docs/sw/2016_11%20Workforce_Task_Force_Implementation%20Recommendations%20Version%201.pdf">http://doingwhatmatters.cccco.edu/portals/6/docs/sw/2016_11%20Workforce_Task_Force_Implementation%20Recommendations%20Version%201.pdf</a></p>
<p><b>LMI Data:</b> [EC§88824(d)(4)] Provide accessible performance and labor-market data that can be used by community college districts and their regional partners to support the implementation of the program and describe related efforts to align regional workforce and education programming with regional labor market needs, including, but not limited to, regional planning efforts established pursuant to the federal Workforce Innovation and Opportunity Act (Public Law 113-128).</p>	<p><b>Local Investment Shall:</b> Provide Evidence of Demand for Workers within the funded CTE Program or Across Multiple Programs</p> <ul style="list-style-type: none"> <li>Identify geography and occupations targeted</li> <li>Identify demand and supply and gap Cite source of Labor Market Information</li> </ul>

<p><b>Local Investment Planning Efforts:</b>  <i>[EC§88823(f)]</i> Community College Districts participating in a consortium shall utilize their region's plan to inform local campus planning efforts to implement career technical education courses, programs, and pathways and integrate available local, regional, state, and nonpublic resources to ensure that students will achieve successful workforce outcomes.</p>	<p><b>Regional Investment Shall --</b> <i>[EC 88823(b)(3-7)]</i> review for the following:</p> <ul style="list-style-type: none"> <li>Summary of Local Share Investments by Sector</li> <li>Regional/Sub Regional Labor Market Information</li> <li>Supply &amp; Demand Table with Living Wage Occupations</li> <li>Other Establish Questions &amp; Agenda for Collaborative Regional Planning</li> <li>Are priority and emergent sectors for the region still the same?</li> <li>What more must be done for students to move through the region's career pathways in the sectors?</li> <li>How will job placement, internships, and regional industry engagement be coordinated?</li> <li>How can industry inform and co-invest in CTE?</li> </ul>
<p><b>Certifications:</b> <i>[EC§88824(d)(5)(A-C)]</i>Community College Districts will certify that the use of funds will meet the intent of the program to accomplish <b>all</b> of the following:</p> <ul style="list-style-type: none"> <li>(A) Increase the number of students in quality career technical education courses, programs, and pathways that will achieve successful workforce outcomes.</li> <li>(B) Increase the number of quality career technical education courses, programs, and pathways that lead to successful workforce outcomes, or invest in new or emerging career technical education courses, programs, and pathways that may become operative in subsequent years and are likely to lead to successful workforce outcomes.</li> <li>(C) Address recommendations from the Strong Workforce Task Force, including the recommended provision of student services related to career exploration, job readiness and job placement, and work-based learning.</li> </ul>	<p><b>Regional Share Plan</b> <i>[EC §88823 (h)]</i></p> <p>Each region's plan shall be for the primary purpose of informing the development of strategies related to career technical education and workforce development courses, programs, and pathways. Each region's plan shall reflect strategies to efficiently and effectively utilize any available public and private resources, including funds for the Career Technical Education Pathways Program established in Part 52 (commencing with Section 88530), in a manner that better aligns career technical education courses, programs, and pathways with the needs of their regional economies.</p>
<p><b>Regional Share Consortium Shall:</b></p> <ul style="list-style-type: none"> <li>• <i>[EC§88824(c)(1) &amp; §88823(b)(1)]</i> each consortium shall select a CCD to be fiscal agent.</li> <li>• <i>[EC§88824(f)]</i> a consortium shall allocate funds only to CCDs.</li> <li>• <i>[EC§88823(b)(2)]</i> a consortium shall establish a governance model for the consortium. Fiscal Resources shall be determined exclusively by the CCDs participating in the consortium.</li> </ul>	

