SWP – REGIONAL FUND PARTICIPATION AGREEMENT

Fiscal Agent: Rancho Santiago Community College District

March 16, 2017

Follow-up to questions from the FA Webinars on March 6th and 7th regarding the following...

1. Duplication
2. Use of SWP-Regional Funds for local, college-based projects
3. Participation in cross-sector/vertical sectors projects
4. Projects with no funding allocated to non-lead college partners
5. Allowable costs under SWP Regional Terms
6. Technical Review Process

1. Duplication

- **Guidance** (Ex. C): **Duplication of Effort**: To avoid duplication of effort, activities funded under the Strong Workforce Program shall be informed by, aligned with, and <u>expand upon the activities of existing workforce and education regional partnerships</u>, 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)]

- **Example:** There are multiple funding streams supporting CTE program development and pathways in the region—e.g., VTEA, CTE Transitions, Career Pathways Trust, WIOA, AEBG, SB1070, DSN In-Region Funds. Investment of SWP-Regional Funds should take into account work that has already been and is being done to build on and expand upon that work.

2. Use of SWP-Regional Funds

■ Guidance from the Chancellor's Office on the process to allocate SWP-Regional Funds and the use of those funds.

- − SWP Regional Fund <u>allocations must occur through a collaborative process</u> where the region reviews and prioritizes project requests and agrees to allocate funds to projects.

- − A project submitted for review <u>may be a local, college-based project</u>. If the region agrees to allocate funds to that local project, then it meets the requirement of a regionally prioritized project.

- − The process for prioritization is collaborative, and the regional priorities that emerge from that process are what guides the funding.

3. Participation in Cross Sector/Vertical Sector Projects

- The Participation Agreement with each college will include the specific work of that college on a Project.

- The college should list all of the projects it will be involved in on its Participation Agreement Summary Sheet, including funded and un-funded involvement in a project.

- If the college is a lead, it would indicate that on the Summary Form, and include the costs and activities associated with serving as the lead on its Budget Detail and Work Plan forms.

- Non-lead partner colleges would list their costs and activities for involvement in the project on their own Participation Agreement forms.

4. Projects with no funds allocated to non-lead college partners

- Some projects will involve non-lead colleges in minimal participation that will not require funding.
  - *In such cases, the college should list the project on the Summary Sheet with a brief statement of the nature of its participation. The college <u>would not</u> complete a Budget Detail or Work Plan if they are not receiving an allocation of funds.*

- The rationale for adding un-funded projects to a college's Summary Sheet is to ensure that the expectation for participation, even at a low level, is visible and documented. This helps during staffing transitions, ensures senior leadership is aware of the project and the college's involvement, and enables the Fiscal Agent to provide descriptive reports on the projects to the Chancellor's Office.

4. (cont.) Projects with no funds allocated to non-lead college partners

- To clarify the role and responsibility of colleges that are not receiving funds the following statement will be added to the bottom of the Participation Agreement Summary Sheet:

  – *"NOTE: Where a college's participation in a project does not include a funding allocation, that college's liability shall be limited to the description of participation provided on the summary sheet and shall not be responsible for the expenditures or operations of other colleges involved in the project. Where a college is receiving a funding allocation, the college shall be responsible for the work plan and related expenditures included in its Participation Agreement and shall not be liable for the expenditures or activities of other colleges in the project."*

5. Guidance on Allowable Costs using SWP Regional Funds

- **Costs are reasonable**, e.g., meet the "front-page of the newspaper test"
  - *Food costs would meet the reasonable test through documentation that substantiates that the costs support CTE work: i.e., a meeting agenda and sign-in sheet.*

- **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 commendations of the Strong Workforce Task Force. *[EC§88824(d)(5)(A-C)]*

- **Un-Allowable Activities:** entertainment, alcoholic beverages, contingency (rainy day funds), goods and services for personal use, lobbying, contributions or donations, fund raising or investment costs, indirect.

- **Strong Workforce Guidance Memo:** http://extranet.cccco.edu/Portals/1/WED/SWP/Guidelines_Reasonable%20Standards_final09-14.pdf

6. Purpose of the Technical Review Process

Ensure that the Participation Agreements meet SWP Guidelines and Enable the Fiscal Agent to Fulfill Its Compliance Function as determined by CCCCO.

- Regionally prioritized projects: on the Summary Sheet colleges identify projects that were included in the Regional Plan.
- Fund allocations: track project allocations per college and determine the total funds allocated to a project; compare with Regional Plans' project allocations to ensure alignment.
- Measurable Outcomes: the Work Plan is complete and aligns with the budget.
- The Participation Agreement forms are complete.
- Review for unallowable costs.
- Labor Market Information: already addressed through the Regional Planning process facilitated by the LA/OC Regional Chairs.

Thank you!

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