California Community Colleges

# SWP 2.0 Frequently Asked Questions
# June 2024 Updates

The following questions were gathered from field requests and feedback since the implementation of Strong Workforce Program (SWP) 2.0. If you have a question not covered by this document, please send it via email to: strongworkforcehelpdesk@cccco.edu. The Chancellor's Office SWP team will update this document at a minimum annually.

## General Questions

1) **How can feedback and ideas be shared regarding SWP and WEDD?**

   Feedback and program improvement ideas can be emailed to the SWP Team: strongworkforcehelpdesk@CCCCO.edu.

2) **Where can we find the legislation that outlines how the SWP funding should be used?**

   The Education Code sections (88820 – 88826) specific to the SWP Community College Component outlines how the funding should be used regionally and locally.

   Expanded Uses of SWP Funding the Fiscal Year 2023 – 2024 enacted State budget included expanded uses of SWP funding as outlined in Education Code section 88825. SWP funds apportioned directly to a community college district may also be used for all the following:

   i) Providing funds for student grants to cover fees for third-party certification and licensing.
   ii) Enhancing student services to support retention, work experience, and job placement.
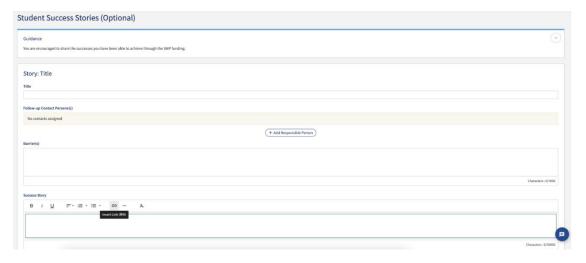
iii) Providing students with an integrated educational program that connects academic curricula to applied and experiential learning in the workplace including, but not limited to, work-based learning programs and models.

## 3) What will be done with the success stories? If we complete them, it would be nice if they were shared publicly to support the program.

The goal of the success stories is to provide examples to decision-makers (e.g. legislature, Department of Finance, etc.) about the successful outcomes of the SWP program investments. The Chancellor's Office will utilize success stories and regional best practices in the annual report submitted to the legislature.

## 4) Is it possible to include links to websites or add attachments to the success stories?

Links and websites can be included in your success story submissions. The NOVA system is not currently setup to accept attachments or upload for success stories.



## 5) Can we connect with our Monitor ahead of submitting our plan for feedback?

Yes, we encourage proactive interactions between Chancellor's Office staff and our stakeholders in the field. If you have any questions regarding your plan, please reach out to your Regional Monitor and they will provide the necessary technical assistance and support.

## 6) When can we expect a memo with our SWP allocation amounts?

The Chancellor's Office distributes allocation memos via email and posts them on our [WEDD Memos webpage](). Comprehensive information about all funding allocations distributed by the Chancellor's Office can be found in our [Compendium of Allocations and Resources]() which is updated each fiscal year.

## 7) Is there a statewide job placement/tracking system being considered by the Chancellor's Office?

No, the Chancellor's Office does not have a statewide system to use for job placement tracking. Student employment outcomes are captured in the [SWP LaunchBoard dashboard]() based on the following information sources: Chancellor's Office Management Information System, CTE Outcomes Survey, National Student Clearinghouse, and CSU/UC Cohort Match.

## 8) Is Chancellor's Office approval required for out of state/country travel?

As of November 2022, the Chancellor's Office will no longer be reviewing or approving out-of-state/country travel requests for SWP. This is now a local decision.

## 9) When are SWP funds considered encumbered?

SWP funds are considered encumbered when there is a commitment or obligation to spend funds for a specific purpose, but the actual expenditures have not been made. The following examples are considered encumbered funds:

- Equipment and supplies: Date of purchase order
- Contracted Services: Date of written agreement
- Travel: When travel is booked

## 10) When are SWP funds considered obligated?

SWP funds are considered obligated when there is a formal commitment to expend the funds. As with all fiscal matters, local policies must also be followed. The following examples are considered obligated funds:

- Equipment and supplies: Obligation occurs Date of Purchase order
- Work of Employees: Obligation occurs When work is done

- Contracted Services: Obligation occurs Date of Written Agreement
- Utilities: Obligation occurs When used
- Rental: Obligation occurs When used
- Travel: Obligated Occurs when travel is taken
- Conference Registration: Obligation occurs when Fee is paid

## NOVA Planning Process

1) **If we change the name of a continuation project, will it also change the name of the previous report?**

   Yes, if you change the name on a project, all references to that project get changed to the new name.

2) **If the project is uncertified and recertified during the life of the project, will the recertification require all levels of approval?**

   Yes. However, some minor changes like updating contacts or modifying success stories are allowed without re-submitting a plan.

3) **Will the monitor have to certify and decertify plans if there are any changes to the plan?**

   No, districts, colleges, and regions can make changes to plans without the monitors having to decertify the plan(s).

   Minor changes such as adding contacts can be done without having to decertify. However, other changes impacting the budget, activities, or more material sections of the plan will require plans to be uncertified. Any substantial changes will require the plan to be recertified.

4) **Will Employer partners receive notification from NOVA anytime a project plan is submitted, certified, approved, or reported on, etc.?**

   No, employer partners entered into SWP 2.0 will not receive notifications on project status updates. For K-12 SWP, all partners including employers receive notifications from NOVA.

5) **LMI, under Supporting Evidence, if we select evidence other than the supply and demand data, does this mean we do not complete the supply and demand data sections which then come after the supporting evidence upload? In other words, we only complete the supply and demand section if this is supporting evidence that we are selecting correct?**

Yes, NOVA will allow supporting evidence uploads to complete the LMI section in place of inputting Centers of Excellence (COE) supply and demand data. Please note that colleges who submit other data source will be received by their regional monitor to ensure the data is appropriate for the funding request.

6) **What is the difference between the objective and activity? They seem a bit redundant.  Can they be the same?**

Objectives define the target impacts of your plan and how those relate to your region's overall strategy. Activities are the tangible steps your plan will take and are connected to specific budget items.

   a. **Activities** define the actions you intend to take – the "What" of your project
   b. **Objectives** define the impacts of those actions are intended to have – the "Why" of your project.

7) **Are regions now signing off on your use of local SWP Funds?**

No, while regions do not "approve" plans, it is required that regions acknowledge that funding plans align to regional priorities as identified in the [4-year SWP Regional Plans](#). College whose plans do not align with regional priorities can expect to receive inquiries from their Regional Monitor about the discrepancy and provide sufficient evidence related to why funds are being used in support of a sector that is not a regional priority but may be a micro-region priority.

## SWP Timelines and Deadlines

1) **Is there a one-page sheet with all the deadlines or will it be posted on the website?**

All reporting deadlines can be found on the [Strong Workforce Program webpage](#) within the 'Planning and Reporting Dates' accordion.

**2) Can we request an extension to submit projects in NOVA?**

Extensions due to extenuating circumstances will be considered on a case-by-case basis. Please request an extension with your Regional Monitor. The Regional Monitor will then get final approval from the SWP Program Lead.

**3) Are there different spending timelines for base and incentive expenditures?**

No, the base and incentive funding has the same spending timelines.

## Use of SWP Funds

**1) Determining an allowable expense.**

When justifying SWP expenditures, a college/district should consider the following:

a. Permissible under District Board Policy.
b. Permissible under District Administrative Procedures.
c. Allowable - Substantiate that the cost was necessary and reasonable for proper and effective administration of the allocation.
d. Reasonable - Necessary for the performance of the grant; following sound business practices (procurement processes, follow state and local laws, follow the terms of the grant); use of fair market prices; acting with prudence under the circumstances; and having no significant deviation from established prices.
e. Allocable - A cost is considered allocable to a particular funding source/program to the extent it actually benefits the objectives of that program. You can only charge in proportion to the value received by the funding source/program.
f. No 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.

g. Ensure that community college district Strong Workforce Program expenditure is focused on improving student success with [workforce outcomes](#) for all students enrolled in community college career technical education courses, programs, and pathways, and addressing the recommendations of the [Strong Workforce Task Force.](#)

h. SWP expenditures must be included in the budget of the associated project plan approved in NOVA.

If the college/district can document each of the considerations, the expenditure will generally be ok with the Chancellor's Office.

## 2) Is out of state travel an allowable SWP expense?

Yes, out of state travel is allowable provided it is in alignment with SWP goals and objectives and associated with an approved project plan in NOVA.

## 3) Is out of country travel an allowable SWP expense?

Yes, out of country travel is allowable provided it is in alignment with SWP goals and objectives and associated with an approved project plan in NOVA.

## 4) If Criminal Justice and Fire Academies are not included in our region's priority sectors, does this mean we cannot fund these programs with SWP allocations?

There are alternative methods of demonstrating labor market need beyond your region's priority sectors. A list of examples is included on the Labor Market Information tab of the SWP 2.0 Planning Workflow.

a. LMI library of curated labor market research compiled by the [Center of Excellence](#).

b. Validated employer input via Employer Survey or Employer Advisory (local or regional).

c. Labor market need has been verified through a regional program approval process.

d. Labor market need has been verified through a regional planning process where this need was an identified regional priority.

e. The local biannual program review process was completed within the last two years and provides a justified labor market need to expand as well as demonstrates greater than 75% program completion and greater than 70% employment of program graduates.

f. Supply and demand data provided by the Labor Market Research Centers of Excellence.

## 5) Can SWP funds be used to subsidize internships with employers?

Subsidized student work experience education is allowed in Title 5 due to recent regulatory changes outlined below. However, districts must identify which fund source can be used for this purpose. There is no specific language in the budget act that allows SWP or K-12 SWP funds to be used for this purpose. The regulation below only applies to community college students, not K-12 students. If you have any additional questions, our email is strongworkforcehelpdesk@CCCCO.edu.

§ 55250. Purpose and Definition of Work Experience Education.
Work experience education within the California Community Colleges involves student employment and/or internships selected, approved, and supervised by districts to provide meaningful work experiences related to the course of study, or specific career pathway training, combined with instruction in critical workplace skills. Work experience education may include paid or unpaid employment, full or part-time employment, and may be structured as separate credit or noncredit classes or integrated as a component of a course. It should be integrated as part of a student's educational pathway allowing students to achieve both educational and occupational goals. It should also assist the student in developing career awareness, learning industry culture, competencies and norms, and developing professional networks in their desired field to support career mobility. Work experience education should provide economically disadvantaged students with opportunities to earn a wage while completing program requirements and earning academic credit.

Title 5 55251. District Responsibilities.
Districts may subsidize student work experience education provided by public employers, or by private employers for the employment of students with disabilities. Any appropriate fund source may be used for such subsidies, which shall be calculated not to exceed a reasonable estimate of the net costs of providing the work experience education opportunity and shall not be used to inflate an employer's usual compensation rate for work experience employees. Districts may provide workers'

compensation insurance for students employed in unpaid work experience education. A student with disabilities is deemed eligible if they are participating in the college DSPS program.

Student without disabilities:
Students without disabilities are students that are enrolled in the college's DSPS program. The DSPS program will verify the student's disability. There are students with disabilities who choose not to enroll in DSPS.  Students who are disabled, but choose not to go through DSPS are not guaranteed DSPS services, accommodations, etc.  This also applies for students who choose to work with ADA coordinator on campus.

**6) Can SWP funds be used to pay for student internships or subsidized wages? To clarify, does the unallowable expenses only refer to students working for external employers? Can colleges continue to pay students to serve as tutors, peer mentors, assistants for college help desk, etc.?**

SWP funds can be used to pay for student interns or subsidize wages only if those position are in support of the administration or execution of a SWP program. For example, if you hire student workers to support your SWP programs or if there is a tutoring component in one of your projects, that is an allowable expense.

However, SWP funds should not be used to subsidize internships with external employers or for campus activities that are not directly tied to the administration or execution of the SWP project. Funding activities that would have been historically funded by the college or are not specific to Career and Technical education (CTE) is consider supplanting. Therefore, while SWP funds can be used for positions like tutors, peer, mentors, or assistants, for college help desk if these roles support SWP program administration, they cannot be used for general internship with local employers.

**7) Can SWP local and/or regional funds be used to lease new space (supporting new training)? If so, could the term of the lease go across funding allocation years if it is included in an ongoing budget plan?**

As with all CTE investments, colleges should judge the appropriateness of investment by assessing the extent to which it supports the Strong Workforce Program goals. As 88824(5) states, districts must certify that the use of Strong Workforce Program funds meets the following requirements:

i) Increase the number of students in quality CTE courses, programs, and pathways that will achieve successful workforce outcomes.

ii) Increase the number of quality CTE courses, programs, and pathways that lead to successful workforce outcomes, or invest in new or emerging CTE courses, programs, and pathways that may become operative in subsequent years and are likely to lead to successful workforce outcomes.

iii) 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.

Colleges should also take into consideration the requirement that these funds not supplant. Assuming that there is a documented strong labor market demand for the program and that the program is the sole beneficiary of the renovation, then this could be a very appropriate expenditure. If the building renovation would also benefit programs that are not CTE or are serving occupations that are not in demand, it would be appropriate to fund the renovation with SWP funds in proportion to the in-demand CTE program's share of the overall costs and benefits of the renovation.

8) **Can a college use Strong Workforce funding to help pay faculty salaries for CTE courses that would have otherwise been dropped for low enrollment? Particularly, in essential industries. Would this be considered supplanting?**

Colleges may not use SWP funds to pay for activities that, in the absence of these funds, would have been provided with local general funds.

## 10% Limitation on "Across All Sectors"

1) **Does the 10% Across All Budget Cap apply to only regional applications, or local as well?**

Yes, the 10% guideline does apply to local and regional plans. If you exceed 10% across all plans at your institution, your Regional Monitor may ask for additional details.

## Short-Term, Non-Credit, Not-for-Credit Course

1) **Will there be" incentive" funding for institutions to implement Not-for-Credit programs? Not-for-credit is not factored into our current funding**
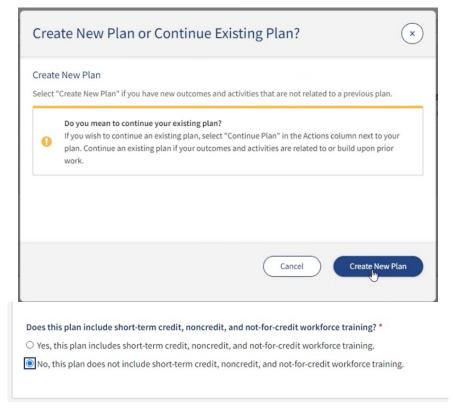
**formula. Non-Credit, as CDCP, is being funded, can we encourage the same for NOT for credit?**

No, however the SWP incentive funding formula was updated to include all noncredit CTE courses and awards of over 48 contact hours, whether they are CDCP approved.

[FAQ for Strong Workforce Program Incentive Funding](#)

2) **How do we handle projects that are not considered short-term training?**

There is a selection when you create a plan that will ask you if it will involve short-term credit, non-credit or not for credit. If this is not involved in your plan, you may select no. This will prevent the requirement to provide employer partners and training info.



3) **Will a signed contract for contract education suffice for the letter from employer if the information is embedded in the contract?**

Yes, Contract Education (Contract Ed) is a vehicle by which training and educational programs can be delivered. Contract training means that the college is being contracted to provide a training that can be for credit, non-credit, or not-for-credit.

Contract Ed is governed by different Ed Code sections and requires the program to be self-sustaining. The employer must cover the cost of the training including overhead associated with putting on the training. Contract Ed requires an employer or organization that needs to train incumbent workers or new workers to an industry.

### 4) Can you provide the difference with contract education vs. not-for-credit education? I'm not sure our employer partners would delineate the difference.

[ARTICLE 1.5. Contract Education [78020 - 78023]](#)

Contract Ed is a vehicle by which training and educational programs can be delivered. Contract training means that the college is being contracted to provide a training that can be for credit, non-credit, or not-for-credit.

Contract Ed is governed by different Ed Code sections and requires the program to be self-sustaining. The employer must cover the cost of the training including overhead associated with putting on the training. Contract Ed requires an employer or organization that needs to train incumbent workers or new workers to an industry.

Not- for- credit training is a training program designed by the college in partnership with an employer. The training does not have to be for credit. It can simply lead to training outcomes agreed to by the employer partner.

The ability to use Strong Workforce funds to subsidize not-for-credit training was designed to increase flexibility for colleges to work with local employers.

### 5) Will contract education be able to provide not-for-credit training?

Yes, Contract Ed is a vehicle by which training and educational programs can be delivered. Contract training means that the college is being contracted to provide a training that can be for credit, non-credit, or not-for-credit.

Contract Ed is governed by different Ed Code sections and requires the program to be self-sustaining. The employer must cover the cost of the training including overhead associated with putting on the training. Contract Ed requires an employer or organization that needs to train incumbent workers or new workers to an industry.

### 6) Can SWP funds be used to upskill workers for not-for-credit course?

Our goal is to support the state's economic recovery efforts. In cases where incumbent workers are in jeopardy of losing their employment and training would support them in obtaining a different position with an existing employer that would be an allowable activity. In other cases, working with your local workforce boards to support getting unemployed individuals the training that leads to gainful employment where companies have made commitments to hire, SWP funds could be used to support those efforts as well.

## Data and Reporting

### 1) If we need to change the budget amounts in different object codes, are we still required to have 3 approvals?

If the budget modifications total to more than 10% of the project plan, the project plan must be decertified and recertified by all parties. If the budget modification total amount is less than 10%, the project plan does not need to be decertified.

[SWP 2.0 Local & Regional 10% Budget Modification](#)

### 2) How does "job vacancies" info differ from LMI? Aren't they the same?

"Job vacancies" is a piece of the overall Labor Market Information. Comprehensive LMI is a set of analyzed quantitative and qualitative data that helps to describe the local, regional, statewide and/or national labor market. Labor market information begins with quantitative data elements collected, organized, and analyzed in ways that measure and assess the:

- Size and characteristics of the labor market, including the demand for and supply of labor and the intersection thereof.
- Factors that influence labor market and economic conditions.
- Industry and occupational characteristics of the work being done.
- Capacity and immediate results from education, training, and job placement.
- Combination of data sets to describe the workforce by industry, occupation, or educational attainment.

To these, labor market information adds qualitative elements about:

- Factors that influence labor market and economic conditions.
- Trends in the economy and workforce.
- Needs and expectations of industries.
- Perceived value of education and certificate programs (existing and proposed).

### 3) Can other data sources be used to get to more specific data as it is with curriculum approvals in the PCAH (Program Course Approved Handbook)?

There are alternative methods of demonstrating labor market need beyond your region's priority sectors. A list of examples is included on the Labor Market Information tab of the SWP 2.0 Planning Workflow.

a) More than 50% of students attained a living wage as evidenced within the LaunchBoard.

b) LMI library of curated labor market research compiled by the Centers of Excellence and Statewide and Regional Directors for Business Engagement.

c) Validated employer input via Employer Survey or Employer Advisory (local or regional).

d) Labor market need has been verified through a regional program approval process.

e) Labor market need has been verified through a regional planning process where this need was an identified regional priority.

f) The local biannual program review process was completed within the last two years and provides a justified labor market need to expand as well as demonstrates greater than 75% program completion and greater than 70% employment of program graduates.

g) Supply and demand data provided by the Labor Market Research Centers of Excellence.

# Training Resources

**1) Are presentations and videos from past webinars available?**

Yes, past presentations and webinar recordings are posted on the WEDD Webinars webpage.

**2) Will new SWP staff be able to get some NOVA training?**

Here are the resources for SWP Onboarding staff: SWP Homepage and the NOVA YouTube channel.

If your institution would like to request additional training, contact the SWP helpdesk at strongworkforcehelpdesk@cccco.edu.