Notice of Nondiscrimination
It is the policy of the Office of the Commissioner of Higher Education that there will be no discrimination or harassment on the grounds of race, color, sex, marital status, religion, national origin, age, sexual orientation, or disability in any educational programs, activities, or employment. Persons having questions about equal opportunity and nondiscrimination should contact the Office of the Commissioner of Higher Education MOA Coordinator at erose@montana.edu

PERKINS RESERVE STRENGTHENING BIG SKY PATHWAYS GRANT 2015-2016 RFP (REVISED)
Perkins Reserve
Strengthening Big Sky Pathway Grants

**Purpose:** To strengthen and build upon the work of the Big Sky Pathways Initiative – providing a smooth transition from high school or Adult Basic Education (ABE) to college and career by increasing relationships between secondary, ABE and postsecondary institutions; enhancing and developing new programs of study and pathways for student participation; expanding career counseling; and growing the availability of dual enrollment, high school for college credit, industry-recognized credentials, work-based learning experiences and internships for students.

**Secondary, ABE and Postsecondary Involvement:** A main focus of the Strengthening Big Sky Pathways Initiative is to build upon and develop new relationships between secondary, ABE and postsecondary institutions, effectively bridging the gap between high school and college and career.

**Awards:** One year grant awards of **up to $75,000** will be available to nine (9) Perkins eligible: tribal colleges, two-year programs, community colleges or consortia for Strengthening Big Sky Pathways projects. The number of grants awarded will be determined by the quality of the applications and the availability of funds. Depending on the availability of funding, it is the intention of the Perkins State Executive Leadership Team (SELT) to make Big Sky Pathway Grants available on a competitive basis until the Perkins reauthorization.

**Match:** Institutions are required to **match at least 5%** of the total funds requested. Funds from the institution’s Perkins Local Grant may be used to fulfill the match requirements. This 5% could be used to fund the following grant components:
- Attendance, participation and hosting an exhibitor table at the MT ACTE Institute that will be held in Billings on October 15-16, 2015
- Including business and industry in partnership activities or events
- Participating in at least two of the MPSEOC 2015 College Fairs

A minimum of thirty-five percent (35%) of the matching funds must be spent on Proposed Pathways/Programs of Studies Activities. For example:

<table>
<thead>
<tr>
<th>GRANT REQUEST</th>
<th>REQUIRED 5% MATCH FROM INSTITUTION</th>
<th>AMOUNT OF MATCHED FUNDS SPENT ON PROPOSED PATHWAYS/PROGRAMS OF STUDIES ACTIVITIES</th>
</tr>
</thead>
<tbody>
<tr>
<td>$75,000.00</td>
<td>$3,750.00</td>
<td>$1,312.50</td>
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<td>$74,000.00</td>
<td>$3,700.00</td>
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<tr>
<td>$72,000.00</td>
<td>$3,600.00</td>
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</tbody>
</table>

**Amendments:** For awarded applicants, amendments to the grant will be accepted until April 1, 2016. All amendment requests must be submitted through E Grants. **No changes to the awarded proposal may be made without prior approval.**

PERKINS RESERVE STRENGTHENING BIG SKY PATHWAYS GRANT 2015-2016 RFP (REVISED)
RFP Timeline:
- Application deadline: April 24, 2015
- Grant winners notified: May 30, 2015
- Grant funds available: July 1, 2015 - June 30, 2016

Commitment of Participation, Reporting and Evaluation: Full participation includes providing necessary reports, including quarterly fiscal reports, quarterly and final reports that document project activities, populations served, and outcomes achieved, as well as a final expenditure sheet at year end. Attendance at state-level professional development and trainings, and participation in technical assistance webinars or conference calls is mandatory. Big Sky Pathway Coordinators are responsible for documentation of time, effort and achievement of measurable outcomes.

Important Tentative Dates:
- BSP Coordinator Conference Calls: On-going; every other week
- Q1 Financial and Program Report: Oct. 29
- Q2 Financial and Program Report: Jan. 29
- Q3 Financial and Program Report: April 30
- Q4 Financial and Program Report: Aug. 30
- Fall Big Sky Pathways Training: Sept. 2015
- Spring Big Sky Pathways Training: March 2016
- Final Program Report: June 30, 2016

Application Materials and Instructions: The Strengthening Big Sky Pathways Application can be found at: http://oche.mtwgms.org/GMSWEB/logon.aspx . It can also be accessed through the MUS.edu website. To enter data into the website, you will need to request a username and password from the Perkins Manager. There are several levels of access within the system:
- Data Entry – This person/s is able to enter/erase data within the system.
- Review – This person/s is able to review data, and does not have privileges to enter data into the system.
- Local Approval – This person is able to enter data, sign off on assurances, and will submit the final application. In other words, this individual acts with signatory authority for the institution and is responsible for ensuring the organization’s application is complete and correct. This person is generally a CTE College Dean, President, or CEO.

For any assistance within the e-grant system, please contact Brenda Swyers of MTW Solutions at Brenda.swyers@mtwsolutions.com .

The SBSP Application will cover a variety of institutional information, including: Program Detail, Budget Information, Assurances, and Amendments. Instructions are provided within the application, by pushing the “Click for Instructions” button in the upper right hand corner of each page. If you have questions about programmatic details within the application, please contact Mindi Askelson at maskelson@montana.edu . If you would like to print your application, you will need to go to the “Application Print” tab and request a print job. Your application will generally be available in less than 24 hours.

PERKINS RESERVE STRENGTHENING BIG SKY PATHWAYS GRANT 2015-2016 RFP (REVISED)
**Use of Funds:** Funds must be used in accordance with:

- During the course of the grant, it is expected that OMB Uniform Guidance: Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards will be adopted through a federal register notice. This guidance supersedes and streamlines requirements from OMB Circulars A-21, A-87, A-110, A-122, A-89, A-102 and A-133 and the guidance in Circular A-50 on Single Audit Act follow-up. At the time this guidance is adopted, it will supersede the circular cited above. [http://www.whitehouse.gov/omb/grants_docs](http://www.whitehouse.gov/omb/grants_docs)

**Application Submission Process:** To be considered for funding, an **E Grant version of the complete application must be received by 5:00 pm on May 1, 2015.**

**Application Conference Call:** A conference call to provide technical assistance in completing the RFP will be held on **April 8, 2015** at 9 a.m. 1-888-387-8686, 4834466#.

**Questions:** For questions about the submission process, please contact OCHE staff at 406-444-0313 or maskelson@montana.edu.
I. Grant Objectives

The objective of the Strengthening Big Sky Pathways Grant is to grow and further develop the Big Sky Pathways Program in the State of Montana by providing students with a smooth transition from high school or Adult Basic Education (ABE) to college and careers. This grant focuses on increasing the following elements:

- Pathways/Programs of Study activities (including opportunities for dual enrollment, internships, work-based learning experiences, and industry-recognized credentials)
- Developing Pathways for both high school and ABE students
- Career Counseling (for career and college readiness)
- Industry Involvement
- Secondary/ABE/Postsecondary Relationships
- Big Sky Pathway Awareness

Big Sky Pathways provide students with:

- An opportunity to explore and learn about careers prior to college
- An opportunity to begin college with credits already earned
- An opportunity to earn credentials that make you more employable
- Confidence to succeed in college attained through interaction with college programs in high school

II. Proposal Components

A. End Of The Year Report

End of the year reporting of Strengthening of Big Sky Pathways funds spent during the current cycle is a required part of the grant application. Briefly describe the specific outcomes that resulted from the utilization of Strengthening Big Sky Pathways funds in the previous grant cycle for the following required components:

- Development of Rigorous Programs of Study
- Cluster Level Seminars
- Career Counseling
- Business and Industry Partnerships
- Professional Development

B. Big Sky Pathway Coordinator (17 Points) (See Scoring Matrix for more details)

Proposals must include designation or hire of a Big Sky Pathway Coordinator to carry out the activities outlined below, and other duties relating to the promotion and development of the Montana Big Sky Pathway program. The Big Sky Pathway Coordinator is funded by Carl D. Perkins dollars and may not be used to fund time or activities outside of the scope of the Big Sky Pathways grant. Coordinators must be in place no later than October 1, 2015. Institutions that do not have a designated Coordinator who is employed at least .5 FTE by October 1, 2015 may NOT incur costs.
**associated with this grant.** Time and effort reporting should be kept, as it is required by the administering entity.

Coordinator’s expectations:
- Initiate and develop new programs of study and pathway agreements with regional high schools while increasing number of participating high schools
- Develop relationships with regional high school personnel
- Update and enhance any existing pathway agreements with area high schools
- Initiate and develop new programs of study and pathway agreements with regional Adult Basic Education programs
- Research and identify new opportunities for: dual enrollment, industry-recognized credentials, work-based learning experiences and internships within pathways
- Increase local/regional business & industry involvement with the Big Sky Pathway Program through developing relationships with Work Force Navigators, Health Coaches, etc.
- Promote Big Sky Pathways by developing a presence on the college web-site; publishing program of study literature, and planning events that will reach a wide audience (parents, students, business leaders, educators)
- Responsible for collecting and managing data between the College and partner agencies, and reporting the results annually

Grant proposals points will be awarded points based on:
- The FTE designation of the Coordinator position
- Coordinator availability
- The length of time the Coordinator has been in the job
- Institution’s willingness to provide professional development
- Institution’s willingness to dedicate non Perkins funds toward the position

Sample Big Sky Pathway Coordinator job description is included in attachment A.

C. Pathways/Program of Study Activities (37 Points) (See Scoring Matrix for more details)
These activities should be developed based on industry and workforce need, student-interest, regional demographics and institutional offerings. Labor market data and workforce information are offered by the Montana Department of Labor here: [http://ourfactsyourfuture.org/](http://ourfactsyourfuture.org/). Activities should be targeted at local secondary and Adult Basic Education (ABE) teachers, counselors and administrator and designed to:
- Increase the number of Pathway options available to students
- Create partnerships with adult basic education providers and to expand opportunities for students to access postsecondary credit bearing pathways

Pathways activities are important components of the Big Sky Pathway program and foster the development of relationships between secondary, ABE and postsecondary institutions. There are many ways this relationship can be fostered, including, curriculum alignments, career cluster
seminars, sharing of resources, identifying and developing industry-recognized credentials and dual enrollment/high school for college credit opportunities within pathways, partnering for student information nights, hosting workshops, pathway exploration days, giving presentations, organizing joint professional development events, etc.

Examples of activities are included in attachment B. **This list is NOT all inclusive.**

A Program of Study for **secondary students** is a plan designed for students to successfully transition from high school to postsecondary education and careers. This course sequence, labeled a “Big Sky Pathway” will include academic and career and technical education (CTE) courses from 9th grade to completion. Programs of Study may culminate in a degree, certification, or industry recognized credential. All Programs of Study developed with high schools must include at least one of the following:

- Opportunity for Dual Enrollment or High School For College Credit
- Industry-Recognized Credential
- Work-Based Learning Experience or Career and Technical Student Organization (CTSO) membership
- Internship

For **adult learners** a Program of Study is a series of connected contextualized education, training experiences and support services that enables adults to acquire marketable skills, industry-recognized credentials, or entrance into post-secondary education through better alignment of education, training and employment in that area. All Programs of Study for the 2015-2016 school year must be completed by March 6, 2016. All submissions are done electronically.

Grant proposals points will be awarded points based on:

- The percentage of matching funds spent on this component
- Use of current data to inform activities and Programs of Study
- Developing and strengthening partnerships
- Number and types of activities planned and expected outcome
- Plans to develop partnerships with ABE
- Plan to effectively and efficiently manage the renewal of previously established Pathways or Programs of Study
- Use of MOUs
- Creativity
- The amount of non-Perkins funds spent on this component
- Plans to document use of Pathways or Programs of Study
- The integration of Big Sky Pathways and college’s strategic plan

**At least 35% of the required match funds must be spent in this area.**

**D. Montana College/Career Fairs (3 Points)** (See Scoring Matrix for more details)

In an effort to increase awareness of the Big Sky Pathway Program and to emphasize the importance
of career counseling, the Big Sky Pathways Program has partnered with the Montana Postsecondary Educational Opportunities Council (MPSEOC) and the Montana Career Information System (MCIS) to provide Big Sky Pathways Career Counseling information at least two (2) career fairs during the MPSEOC 2015 College Fair Tour.

The College Fair Tours listed below will host teachers, counselors, students, and staff attending career fairs. Big Sky Pathway Coordinators will be on hand during these events to interact with attendees, and to answer questions and promote the Big Sky Pathway Initiative. Institutions must commit to funding the travel expenses and conference costs of the BSP Coordinator’s attendance at least two (2) MPSEOC college fair as part of their match. Perkins Local Grant funds may be used. MPSEOC college fair information will be available at: http://www.mpseoc.org/montana-college-fairs.html. In your grant proposal, please include at least two locations where your institution would like to participate.

Grant proposals points will be awarded points based on:
- Attendance at the fairs
- Using Perkins funds towards this category
- Using non-Perkins funds towards this category

E. Montana ACTE (14 Points) (See Scoring Matrix for more details)
MT ACTE strives to provide leadership in developing an educated, prepared, adaptable, innovative and competitive workforce. The annual MT ACTE Institute is held October 15-16, 2015 in Billings MT and provides an excellent platform to promote the importance of BSP by hosting an exhibitor booth. Indicate how your institution will participate in this conference. For more information about MT ACTE go to: http://www.montanaacte.org/

Grant proposals points will be awarded points based on:
- Attending the institute
- Attending the institute as a vendor
- Submitting a proposal to present at the Institute
- Attending either the Region V or National ACTE conferences
- Becoming an MT ACTE sponsor using non-Perkins funds.

F. Industry Involvement (12 Points) (See Scoring Matrix for more details)
Industry involvement in Perkins and Pathway programs is essential to ensure that education is providing the skills and technical expertise that is needed by today’s employers. It is important to partner with local, regional, and even national business and industry organizations to ensure students are adequately prepared to enter the workforce upon completion of a degree, certificate, or industry-recognized credential.

There are many opportunities to partner with business and industry, the most basic is using Advisory Boards economic data to inform programing decisions. The most effective and efficient partnerships should begin with aligning strategies with your institution’s Workforce Navigators. Other partnering opportunities include work-based learning and internships within a program of study, providing professional development to institutional faculty and staff, arraigning career industry panels at high
schools, industry location tours.

Grant proposals points will be awarded points based on:
  o Use of current regional data to in decision making
  o Utilizing Workforce Navigators
  o Developing or utilizing a method to measure business and industry participation in BSP development
  o Develop partnerships with agencies to offer any of the following: Apprenticeship, Internship, Externship, one stops, OJT or earn as you learn
  o Develop partnerships with any of the following: correctional institutions/agencies, institutions/agencies that serve those with special needs or Tribal TEROs

G. Pathway Awareness (39 Points) (See Scoring Matrix for more details)
Big Sky Pathways is still one of Montana’s best kept secrets. It is essential public awareness and understanding of the value of Big Sky Pathways and their impact on college and workplace readiness. Awareness opportunities must be targeted towards three specific audiences: secondary students, parents of secondary students and Adult Basic Education students. Other awareness must happen through: the development of a tangible product in one or more of the following medians: print, TV, Radio, and Web based or social media. The ultimately goal is for Big Sky Pathways to become an integral part of the institution’s identity as well as its marketing efforts and strategic planning.

In an effort to jumpstart public awareness of BSP, OCHE is working on protocols for displaying and promoting of a High School to College opportunities website which will include Dual Enrollment and BSP. We will be reaching out to campuses to participate in refining of these guidelines, which will be included in the updated Dual Enrollment guidelines that will be submitted to the Board of Regents Fall 2015. Participation includes reviewing and responding to evaluation requests and soliciting evaluations and feedback from high school students.

The gathering and analysis of data has become increasing more important as we move towards Perkins reauthorization. As a state it is necessary to develop and test systems that accurately identify and track secondary school awareness and usage of pathways. Knowing that the best ideas usually come from the “front line”, institutions may use funds from this grant to design, implement and/or evaluate a system for gathering and analyzing pathways data. The objective of this project is to quantify the effect that Pathways has on Montana students and workforce. Suggested variables may include any of the following:

  o Number of secondary schools including Pathways in registration booklets
  o Secondary Counselors level of knowledge of Pathways
  o Number of secondary Counselors advising students into Pathways
  o Number of parents attending an informational session on Pathways
  o Number of students inquiring about Pathways
  o Number of students utilizing Pathways
  o Academic attainment of students utilizing Pathways
Grant proposals points will be awarded points based on:
- Participation in refining guidelines for the High School to College website
- Production of tangible marketing pieces
- Variety of marketing strategies used
- Partnerships opportunities
- Use of Perkins funds towards this category
- Use of non-Perkins funds towards this category
- Development of accountability measures
- Integration of Pathways into college’s marketing and strategic plans

H. Professional Development (12 Points) (See Scoring Matrix for more details)

It is essential to stay current with trends and best practices within the field of Career & Technical Education and the implementation of Programs of Study. Therefore, biweekly technical assistance calls, OCHE sponsored Pathways trainings and at least one national development and training opportunity are mandatory. Attendance of other state sponsored educational conferences is strongly encouraged.

Grant proposals points will be awarded points based on:
- Attendance of OCHE sponsored Pathways trainings
- Participation in OPI professional development events
- Attendance at one national conference
- Use of Perkins for professional development
- Use of non-Perkins for professional development
- Providing or participating in MCIS trainings

Suggested Professional Development & Training

National Career Pathways Network Annual Conference: October 28-30, 2015 in Dallas, TX
http://www.ncpn.info/

CareerTech VISION Conference: November 19-22, 2015 in New Orleans, LA
http://www.careertechvision.com/

The Montana School Counselor’s Association Conference is generally held in April of each year. This venue provides an opportunity to network with counselors from schools across the state, and provides an excellent platform to promote the importance Big Sky Pathways Program
http://www.mtschoolcounselor.org

This brief list of suggested training is not all inclusive.
Budget
The Use of Funds page under the Program Detail tab must be completed before budget figures can be entered into EGrant. When developing the budget please include the following information in your narrative:

- **Salaries** – The name and position of who is being paid, at what FTE and the total amount.
- **Hourly wages** – same as salaries
- **Employee benefits** – include a list of who is receiving benefits, what type of benefits, and how much is paid per benefit
- **Consumable supplies** – include a list of the types of supplies and the costs estimated with each.
- **Travel** – include a list of who is traveling, the mileage, lodging, meals, airfare, etc. Use the state approved reimbursement schedule. **Using campus or school district vehicle for grant funded travel is expected. Use of personal vehicles is reimbursed at 27.7 cents per mile.** In-state per diem is $23 a day ($5 breakfast, $6 lunch, and $12 dinner). Out of state per diem is $41 per day ($7 breakfast, $11 lunch, and $23 dinner). See the 2015 Travel Cheat Sheet attachment C.
- **Food** - According to the U.S. Department of Education, as a general rule there is a high burden of proof that resides with the grantee: “...to show that paying for food and beverages with Federal funds is necessary to meet the goals and objectives of a Federal Grant.” To determine whether is it appropriate to use Perkins Funds for a working lunch refer to the guidelines found in attachment D.
ATTACHMENT A

Sample Big Sky Pathway Coordinator Job Description Components

Statement Describing Expectations and Responsibilities of the Position

The Program Manager position is a (__ FTE) twelve-month position that is contingent on annual grant funding with the responsibility to coordinate and manage all of the objectives, activities, and evaluations required in the Strengthening the Big Sky Pathways grant as directed by the Montana Office of the Commissioner of Higher Education for _____ College.

The Primary Categories of Responsibility:

- Initiate and develop new programs of study and pathway agreements with regional high schools while increasing number of participating high schools; develop relationships; Update and enhance any existing pathway agreements with area high schools.
- Initiate and develop new programs of study and pathway agreements with regional Adult Basic Education programs.
- Research and identify new opportunities for: dual enrollment, industry-recognized credentials, work-based learning experiences and internships within pathways.
- Increase local/regional business & Industry involvement with the Big Sky Pathway Program through developing relationships and increasing participation in events
- Promote Big Sky Pathways by developing a presence on the college web-site; publishing program of study literature, and planning at least two annual events that will reach a wide audience (parents, students, business leaders, educators).
- Responsible for collecting and managing data between the College and partner schools, and reporting the results annually.
- Increase Career Counseling resources and events for students, parents, and staff through the __ College Big Sky Pathway Program.

Minimum Position Skills, Knowledge & Abilities

- Experience working with high school principals, teachers and counselors.
- Experience working with two-year College and university faculty.
- Teaching experience at the secondary or post-secondary level.
- Excellent interpersonal skills; positive attitude; ability to work independently or as part of a team; to remain calm and professional in all situations; and to work independently, efficiently, and accurately with frequent interruptions.
- Ability to develop effective and productive formal and informal working relationships with persons inside and outside the University.
- Ability to set own priorities and work methods and to provide strong administrative and financial oversight.
- Ability to manage all personnel and fiscal matters in a professional and confidential manner.
- Excellent verbal and written communication abilities including making presentations and the composition of letters and memos.
- Knowledge in the use of computer software programs for personal computers including Microsoft Office Suite.
- Ability to use standard office equipment including fax, copiers, scanners, printers and multi-line phones.
ATTACHMENT B

Examples of Pathways/Program of Study Activities

- Go with an industry partner to speak at a high school
- Help students with College Application Week
- Speak about CTE/Pathways at school board meetings
- Bring industry to a high school to speak about jobs in the region
- Attend high school events or contests featuring CTE themes
- Sponsor industry trainings for high school CTE instructors and counselors
- Provide/host professional development for high school CTE instructors and counselors
- Cluster Seminars
- Host hands on Career Fair
- Work with ABE students to develop an individual career pathway
- Support externship for CTE faculty
- Develop a bridge program
- Establish an Apprenticeship program
- Speak to middle school students
- Speak at local high school registration event
- Work with high school CTE teachers/Counselors developing a career pathway
- Check that previous pathways are current
- Develop a BSP website, newsletter, or speakers' bureau
- Host field trips for high school students, CTE teachers, and counselor on college campus
- Bring industry partner to speak at field trip activity about jobs and careers
- Be part of other campus activities geared toward high school students to both help the students but for more visibility of the program
- Help students with FAFSA night – partner with SAF and TRiO
- Attend and participate with career fairs in the high schools
- Participant in College Orientations, College for a Day, or other campus events for potential students
- Participate in events and meetings relevant to college’s career pathways, including those for Advisory Councils, curriculum, CTE, counselors and MCIS.
- Develop and share a flyer and/or presentation package (such as a PowerPoint) for school partners to use in their own presentations to students, parents, and other teachers
- Organize a Business and Industry speaker’s bureau to speak at different high schools
- Serve on committees for the school district
- Set up a CTE mentoring for high school students and college
- Coordinate teaching opportunities with ABE and college CTE faculty
ATTACHMENT C
2015 Travel Cheat Sheet

Per Diem Rates

<table>
<thead>
<tr>
<th></th>
<th>In-State</th>
<th>Out of State</th>
<th>Foreign</th>
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</thead>
<tbody>
<tr>
<td>Morning Meal</td>
<td>$5</td>
<td>$7</td>
<td>$7</td>
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<tr>
<td>Midday Meal</td>
<td>$6</td>
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<td>$11</td>
</tr>
<tr>
<td>Evening Meal</td>
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<td>$23</td>
<td>$18</td>
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<tr>
<td>Total per day</td>
<td>$23</td>
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<td>$36</td>
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</table>

Lodging Reimbursements

(Rates do not include taxes)

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<th></th>
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<th>Out of State</th>
<th>Foreign</th>
</tr>
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<tbody>
<tr>
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<td>$83</td>
<td>$155</td>
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<tr>
<td>High Cost Rate</td>
<td><strong>see GSA website for rates</strong></td>
<td></td>
<td></td>
</tr>
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</table>

**In-State High Cost Areas: Flathead, Gallatin, Lake, Lewis & Clark, Missoula, Dawson, Richland, and Silver Bow**

**Rates over Standard/High Cost Rate will need Pre-Approval**

Mileage Reimbursements

(Per statute as of January 1, 2015)

MCA 2-18-503

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<th>Additional Information</th>
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<tr>
<td>High Rate</td>
<td>0.575</td>
</tr>
<tr>
<td>Low Rate</td>
<td>0.545</td>
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</tbody>
</table>

**Must meet certain requirements to qualify for high/low rates**

Useful Website URL's:

State Travel  http://sfsd.mt.gov/SAB/EmployeeTravel
GSA  http://www.gsa.gov/portal/category/104711

Pre-Approval is required for:

--Personal Vehicle Usage
--Out of State Travel
--Foreign Travel
--Lodging at Actual Cost

**Pre-Approval by the Director or Designee**
Ms. Pat Kaiser  
Director, Federal Financial Management  
Missouri Department of Elementary and Secondary Education  
P. O. Box 480  
Jefferson City, MO 65102  

Dear Ms. Kaiser:

As you know, in May 2013, the U.S. Department of Education (ED) issued Frequently Asked Questions to Assist U.S. Department of Education Grantees to Appropriately Use Federal Funds for Conferences and Meetings (FAQs) [available at: http://www2.ed.gov/policy/fund/guid/gposbul/gposbul.html]. Those FAQs include a number of questions regarding using Federal grant funds to pay for food. As a general rule, the FAQs state:

Generally, there is a very high burden of proof to show that paying for food and beverages with Federal funds is necessary to meet the goals and objectives of a Federal grant. When a grantee is hosting a meeting, the grantee should structure the agenda for the meeting so that there is time for participants to purchase their own food, beverages, and snacks. In addition, when planning a meeting, grantees may want to consider a location in which participants have easy access to food and beverages.

While these determinations will be made on a case-by-case basis, and there may be some circumstances where the cost would be permissible, it is likely that those circumstances will be rare. Grantees, therefore, will have to make a compelling case that the unique circumstances they have identified would justify these costs as reasonable and necessary.

Since the FAQs were issued, you posed a number of scenarios regarding whether the “unique circumstances” referenced in this FAQ would include using Federal funds to provide meals during a “working lunch.” Some of those scenarios involve the use of Title I, Part A funds; others involve the use of funds from other Federal education programs. Because my responsibilities include Title I, Part A, I am responding with guidelines that address the use of Title I, Part A funds only. However, I believe the guidelines discussed below will be helpful to you in also evaluating the use of other Federal education funds.

Providing meals during a “working lunch” may be an allowable use of Title I, Part A funds if, in order to carry out a conference or meeting agenda within the time available, it is necessary to work through lunch. As noted above, however, a State educational agency (SEA) or local
educational agency (LEA) must make a compelling case for this cost. As an initial matter, an SEA or LEA should determine whether a face-to-face meeting or conference is the most cost-effective way to conduct business or whether video conferencing or other technological approaches would suffice. Assuming a face-to-face meeting or conference is necessary, the SEA or LEA should determine if it is possible to accomplish the agenda of the meeting or the conference without working through lunch, because Federal grant funds may not be used to pay for a “working lunch” that is not necessary.

To evaluate the appropriateness of using Title I, Part A funds for a working lunch, an SEA or LEA should consider the following guidelines:

1. **Is a working lunch necessary?** An SEA or LEA using Title I, Part A funds to host a conference or meeting should, before deciding that a working lunch is necessary, plan the agenda and, consistent with these guidelines, determine that there are no alternatives to working through lunch in order to accomplish all the key business of the conference or meeting. For that reason, it is not appropriate to decide — prior to planning the agenda — that a working lunch is desired or needed and then construct an agenda in order to justify that decision.

2. **Is the portion of the agenda to be carried out during lunch substantive and integral to the overall purpose of the conference or meeting?** Attendance during a working lunch must be necessary to ensure attendees’ full participation in substantive discussions, lectures, or speeches that are integral to the purpose of the meeting or conference. Inspirational talks, testimonials, entertainment, award ceremonies, and informal discussions among attendees or networking, in most instances, would not be an appropriate agenda item for a working lunch. If a working lunch is not justifiable, an SEA or LEA might offer attendees the opportunity to purchase a lunch that the SEA or LEA delivers to the conference or meeting site. Alternatively, the SEA or LEA might deduct the cost of lunch from any per diem paid to attendees. These options could suffice, for example, if there are not opportunities near the meeting site to purchase lunch or if disabilities prevent individuals from easily going off site to procure lunch.

3. **Is there a genuine time constraint that requires the working lunch?** If a conference or meeting agenda could, without unduly disrupting attendee schedules or making the day unreasonably long, e.g., starting an hour earlier or ending later, a working lunch might not be justified. If, however, an SEA or LEA has designed a day-long meeting in order to save lodging costs and some participants must travel a considerable distance to attend, a working lunch might be appropriate because, absent the working lunch, it would not be possible for the SEA or LEA to cover the entire agenda and still provide participants sufficient time to return home in order to avoid the additional costs of lodging.

4. **If a working lunch is necessary, is the cost of the working lunch reasonable?** A working lunch, when it is necessary, must also be reasonable in cost. Lunches that include extravagant components would not only raise appearance concerns, but also violate the requirements of the Education Department General Administrative Regulations and the cost principles that costs charged to Federal grants must be reasonable.
### SCORING MATRIX SBSP PATHWAY UTILIZATION MEASUREMENT

**Big Sky Coordinator:** Proposals must include designation or hire of a BSP Coordinator. This position must be at least .5 FTE and focused solely on duties relating to the promotion and development of Montana BSP program.

<table>
<thead>
<tr>
<th>Availability (6)</th>
<th>Longevity (3)</th>
<th>Position Composition (4)</th>
<th>Funding (4)</th>
<th>Total of 17 points</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Coordinator will be in place by October 1, 2015 (1)</td>
<td>• The Coordinator has been in the position less than a year (1)</td>
<td>• Coordinator is a .50 FTE (1)</td>
<td>• College has dedicated Perkins funds toward salary (1)</td>
<td><strong>Total of 17 points</strong></td>
</tr>
<tr>
<td>• Coordinator is currently in place (2)</td>
<td>• The Coordinator has been in the position for more than a year and less than two years (2)</td>
<td>• Coordinator is more than .50 but less than 1 FTE (2)</td>
<td>• College has dedicated Perkins funds towards travel and professional development (1)</td>
<td><strong>Total of 17 points</strong></td>
</tr>
<tr>
<td>• A designee is available to attend all workshops (1)</td>
<td>• The Coordinator has been in the position for longer than two years (3)</td>
<td>• Coordinator position is combined with other position for a 1.0 FTE (3)</td>
<td>• College has dedicated non Perkins funds toward salary (2)</td>
<td><strong>Total of 17 points</strong></td>
</tr>
<tr>
<td>• The Coordinator is available to attend all workshops (2)</td>
<td></td>
<td>• Coordinator position is combined with Dual Enrollment for a 1.0 FTE (4)</td>
<td>• College has dedicated non Perkins funds towards travel and professional development (2)</td>
<td><strong>Total of 17 points</strong></td>
</tr>
<tr>
<td>• A designee is available to attend all Technical Asst. calls (1)</td>
<td></td>
<td></td>
<td></td>
<td><strong>Total of 17 points</strong></td>
</tr>
<tr>
<td>• The Coordinator is available to attend all Technical Asst. calls (2)</td>
<td></td>
<td></td>
<td></td>
<td><strong>Total of 17 points</strong></td>
</tr>
</tbody>
</table>

**Proposed Pathways /Programs of Studies Activities:** should be developed based on industry and workforce need, student-interest, regional demographics and institutional offerings. These activities should be targeted at local secondary and Adult Basic Education (ABE) teachers, counselors and administrator and designed to:

- Increase the number of Pathway options available to students.
- Create partnerships with adult basic education providers and to expand opportunities for students to access postsecondary credit bearing pathways.

At least 35% of the required match funds must be spent in this area.

<table>
<thead>
<tr>
<th>Data (2)</th>
<th>Activities (12)</th>
<th>Partnerships (13)</th>
<th>Planning (6)</th>
<th>Funding (4)</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Current data is used to inform program decisions (1)</td>
<td>• Plans to continue successful event(s) held previous year (1)</td>
<td>• Uses MOUs when forming partnerships (1)</td>
<td>• Has a plan to review previous developed Pathways (1)</td>
<td>• At least 35% of matching funds(Perkins) is dedicated to this category (1)</td>
</tr>
<tr>
<td>• Current data is used to inform program decisions and is cited in the application (2)</td>
<td>• Plans to create new events in areas where previous activities have occurred (2)</td>
<td>• Collaborate with OPI specialists to provide training or Program of Studies activities with a secondary partner (2)</td>
<td>• Has plans to document the number of students participating in a pathway <strong>(2)</strong></td>
<td>• At least 35% of matching funds(non- Perkins) is dedicated to this category (2)</td>
</tr>
<tr>
<td></td>
<td>• Plans to create new events in an area where there have been no previous activities (3)</td>
<td>• Plans to develop partnerships with ABE by March 30, 2016 (3)</td>
<td>• BSP is integrated into college strategic plan <strong>(3)</strong></td>
<td>• More than 35% of matching funds(Perkins) is dedicated to this category (3)</td>
</tr>
<tr>
<td></td>
<td>• Plans to create at least two new Pathways during the current year (4)</td>
<td>• Previous contacts with area high school and district administration will be revisited (3)</td>
<td></td>
<td>• More than 35% of matching funds(non- Perkins) is dedicated to this category (4)</td>
</tr>
<tr>
<td></td>
<td>• Creativity in events (2)</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
** Plans must be submitted using the Additional Comments section under the Program Detail tab.

### MPSEOC College Fairs

In effort to increase awareness of the BSP program and to emphasize the importance of career counseling we are partnering with MT Postsecondary Educational Opportunities Council (MPSEOC) and MCIS to provide BSP career counseling at the MPSEOC 2015 College Fair Tour. Grantees must participate in at least two (2) fairs.

This is a required match area and Perkins funds may be used in this area.

<table>
<thead>
<tr>
<th>Attendance (1)</th>
<th>Funding (2)</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Attend at least two (2) college fairs (1)</td>
<td>• Used Perkins funds toward this category decisions (1)</td>
</tr>
<tr>
<td>• Used non Perkins funds towards this category (2)</td>
<td></td>
</tr>
</tbody>
</table>

Total of 3 points

### Montana ACTE

MT ACTE strives to provide leadership in developing an educated, prepared, adaptable, innovative and competitive workforce. The annual MT ACTE Institute is held on October 15-16, 2015 in Billings MT and provides an excellent platform to promote the importance of BSP by hosting an exhibitor table, serving as a presenter or becoming a sponsor. Indicate how your institution will participate in this conference.

This is a required match area and Perkins funds may be used in this area.

<table>
<thead>
<tr>
<th>Attendance (4)</th>
<th>Presentation (3)</th>
<th>Funding (7)</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Attend Fall Institute and register to have a vendor booth at the trade show (1)</td>
<td>• BSP Coordinator submits a presentation proposal for Fall Institute (1)</td>
<td>• Attend Fall Institute and register to have a vendor booth at the trade show using Perkins funds (1)</td>
</tr>
<tr>
<td>• Attend regional V or national ACTE conference (3)</td>
<td>• BPS Coordinator and a post-secondary partner submits a presentation proposal for Fall Institute (2)</td>
<td>• Attend regional V or national ACTE conference using Perkins funds (1)</td>
</tr>
<tr>
<td>• BPS Coordinator and a secondary partner submits a presentation proposal for Fall Institute (3)</td>
<td>• Attend Fall Institute and register to have a vendor booth at the trade show using non Perkins funds (2)</td>
<td>• Attend Fall Institute and register to have a vendor booth at the trade show using non Perkins funds (1)</td>
</tr>
<tr>
<td>• Attend Fall Institute and register to have a vendor booth at the trade show using non Perkins funds (2)</td>
<td>• Attend regional V or national ACTE conference using non Perkins funds (2)</td>
<td>• Attend regional V or national ACTE conference using non Perkins funds (2)</td>
</tr>
<tr>
<td>• Participate as a sponsor at the Fall Institute using non-Perkins funds (3)</td>
<td>• Participate as a sponsor at the Fall Institute using non-Perkins funds (3)</td>
<td></td>
</tr>
</tbody>
</table>

Total of 14 points
Industry Involvement – Please describe how you will include business and industry in partnership activities or events. This is a required match area and Perkins funds may be used in this area.

<table>
<thead>
<tr>
<th>Data (2)</th>
<th>Partnerships (9)</th>
<th>Evaluating (1)</th>
</tr>
</thead>
</table>
| • Current data is used to inform program decisions (1)  
  • Current data is used to inform program decisions and is cited in the application (2) | • Utilize institutional relationships with local chamber of commerce/economic development boards (1)  
  • Utilize Workforce Navigators to inform programing decisions (2)  
  • Develop partnerships with agencies to offer any of the following: Apprenticeship, Internship, Externship, One Stops, OJT or earn as you learn (3)  
  • Develop partnerships with any of the following: correctional institutions/agencies, institutions/agencies that serve those with special needs or Tribal TEROs. (3) | • Develop or utilize method to measure Business and Industry participation in Pathway development (1) |

Pathway Awareness - Discuss how your institution will create awareness of BSP opportunities that specifically reaches secondary students and parents and Adult Basic Education students. Activities and events must result in the development of a tangible product in one or more of the following medians: print, TV, Radio, and Web based or social media.

1. enhance their knowledge and understanding of BSP  
2. stress the value of the Big Sky Pathways program

<table>
<thead>
<tr>
<th>Audience (17)</th>
<th>Material Medians (5)</th>
<th>Planning (12)</th>
<th>Funding (5)</th>
</tr>
</thead>
</table>
| • Develop awareness materials for secondary students (1)  
  • Develop awareness materials for secondary students and parents (2)  
  • Develop awareness materials for secondary students, parents and ABE students (3)  
  • Plans ABE and post-secondary faculty events or opportunities (3)  
  • Plans high school parent events or opportunities (3)  
  • Plans high school and post-secondary faculty events or opportunities (4)  
  • Plans high school and post-secondary students events or opportunities (4) | • At least two different medians are used for awareness material (2)  
  • Plans to participate in refining guidelines for the High School to College website (3) | • College has developed a specific Pathway marketing plan **(2)  
  • Pathway Awareness is Included in college’s marketing plan **(3)  
  • College develops a plan to measure Pathways Awareness for at least one of the three required populations ** (1)  
  • College develops a plan to measure Pathways Awareness for at least two of the three required populations ** (2)  
  • College develops a plan to measure Pathways Awareness for all three required populations ** (3)  
  • BSP is an integral part of the college strategic plan ** (1) | • College dedicates at least 20% of funds as mandated in Perkins Local Grant towards Pathway Awareness (1)  
  • College dedicates more than 20% of funds as mandated in Perkins Local Grant towards Pathway Awareness (2)  
  • Non Perkins funds are used to fund Pathway Awareness (3) |

** Plans must be submitted using the Additional Comments section under the Program Detail tab.
### Professional Development - What opportunities for professional development does the BSP Coordinator plan to attend, or any workshops or events your institution plans to hold for their partners?

This is a required match area and Perkins funds may be used in this area. Total of 12 points

<table>
<thead>
<tr>
<th>Funding (2)</th>
<th>Attendance (5)</th>
<th>Developing (5)</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Perkins funds used to provide professional development for BSP Coordinator (1)</td>
<td>• Plans to participate in MCIS training (1)</td>
<td>• Offers MCIS training to secondary students or faculty (1)</td>
</tr>
<tr>
<td>• Non Perkins funds used to provide professional development for BSP Coordinator (2)</td>
<td>• Mandatory attendance at BSP State conference (1)</td>
<td>• Provides professional development to secondary faculty (1)</td>
</tr>
<tr>
<td></td>
<td>• Mandatory attendance of one approved national pathways conference (1)</td>
<td>• Provides professional development for ABE faculty (1)</td>
</tr>
<tr>
<td></td>
<td>• Plans to participate in a OPI professional development event (2)</td>
<td>• Provides professional development for post-secondary faculty (1)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Assists OPI in planning or hosting a professional development event (1)</td>
</tr>
</tbody>
</table>