

Las Positas College

Student Equity & Achievement (SEA) Program

Proposed - Reasonable and Justifiable Expenditure Guidelines - *(Draft as of November 6, 2018)*

The Student Equity & Achievement (SEA) program is the consolidation of the Basic Skills Initiative (BSI), Student Equity (SE), and the Student Success & Support Program (SSSP) as defined by California Education Code.

All SEA program expenditures should be reasonable and justifiable. "Reasonable" means expenditures are prudent and every effort is made to utilize funds efficiently. "Justifiable" means expenditures are consistent with goals and activities related to the SEA program. Colleges are strongly urged to develop policies and procedures to document and justify program expenditures. Developing written documentation prior to the time of expenditure is recommended. This documentation should clearly establish the link between a given expenditure and SEA program goals and objectives.

In general, the Chancellor's Office will not provide an exhaustive list of allowable and non-allowable expenditures, as decisions for each expenditure must be made locally according to program objectives and activities, and the "reasonable and justifiable" criteria as outlined above.

Colleges and districts are ultimately responsible for expenditure decisions. This responsibility cannot be delegated. The SEA program will be included in the District Audit Manual with the expectation that district-contracted auditors annually audit expenditures. Audits may also be conducted by the California Bureau of State Audits, the California Community Colleges Chancellor's Office, or other government agencies with a lawful interest in the expenditure of funds.

Reasonable & Justifiable - Eligible Expenditures and Activities:

1. Financial support may be used for targeted outreach by means of publications and outreach materials to potential student groups and communities identified in the Student Equity Plan as being from disproportionately impacted groups, and the 2017-2019 Unified Plan: Basic Skills Initiative (BSI), Student Equity (SE), and Student Success & Support Program (SSSP). Outreach may include, but is not limited to, brochures, flyers, newspaper, online, radio, television, and social media.
2. Financial support may be used for Student Services entities including state funded categorical (restricted) programs that directly support improved outcomes on success indicators for target populations prioritized in the Student Equity Plan in accordance with applicable state laws and regulations. Any direct student support provided should supplement, not supplant any services provided to students currently participating in state funded categorical programs and any other federal, state, and county programs.
3. Financial support may be used for institutional research, institutional effectiveness, planning, and evaluation related to improving student equity and success.
4. Financial support may be used for hiring a student equity program director or coordinator and support staff (full-time and part-time classified professionals and faculty that may include reassign time) to directly coordinate, support, and implement student equity and success activities.

5. Financial support may be used to provide food and refreshments for equity and success related planning meetings, professional development, and student gatherings. Expenditures for food and refreshments may not exceed 5% of the overall SEA program annual allocation.
6. Financial support may be used for professional development for administrators, classified professionals, faculty, and students. Professional development includes, but is not limited to, college sponsored activities and events (e.g., Convocation Day, College Day, Flex Day, etc.); and in state and out-of-state travel to attend, participate, and present at conferences and trainings (e.g., Historically Black Colleges & Universities field trips, Puente Project field trips, etc.) in accordance with state laws and local policies and procedures. Professional development may also include the hiring consultants to educate College employees on the effects of student inequities and strategies to reduce them; methods for detecting and researching student inequities and their effects on college programs and local communities; improving the use of data; and effective practices and methods for addressing and improving outcomes for under-served students.
7. Financial support may be used for developing or adapting academic or career related programs, and credit and non-credit curriculum and courses to improve student equity outcomes and success. Align and augment funding to support Guided Pathways, Strong Workforce, and other college-wide initiatives to address student equity and success.
8. Financial support may be used for providing embedded tutoring, counseling, supplemental instruction, and other academic and student support services.
9. Financial support may be used for computer hardware, computer software, and related peripherals to be used primarily by students and directly in support of students, excluding large-scale technology projects.
10. Financial support may be used to purchase office supplies (e.g., paper, pens, pencils, highlighters, etc.), furniture (e.g., bookcases, chairs, desks, etc.), or related equipment (e.g., whiteboards, markers, erasers, etc.) for College employees assigned directly support and improve student equity and success.
11. Financial support may be used to provide for other direct academic and student support services including, but not limited to, textbooks, supplies, tools, uniforms, transportation, childcare, and course materials.

Reasonable & Justifiable - Ineligible Expenditures and Activities:

1. Financial support may **not** be used for college construction, remodeling, renovation, repairs, maintenance, operations, parking lots, or the purchase, rental, or leasing of buildings on-campus or off-campus.
2. Financial support may **not** be used to make political contributions to any person or political campaign, political party, political action committee, or lobbying entity or lobbyist. In addition, financial support may not be used to pay for political or professional dues, memberships, or contributions.
3. Financial support may **not** be used to pay for courses or the delivery of courses that may otherwise be eligible to receive general funds or other special funding to generate full-time equivalent students (FTES).
4. Financial support may **not** be used to provide gift of public funds to include gifts or monetary awards of any kind. Expenditures for a public purpose are not considered a gift of public funds.

5. Financial support may **not** be used to provide stipends for students to attend, participate, and present at professional development activities and opportunities; or to students for their participation in academic and student support programs and services or classroom activities.
6. Financial support may **not** be used to purchase computer hardware, computer software, and related peripherals not primarily to be used by students and do not directly support students. Large-scale technology projects are ineligible for funding.
7. Financial support may **not** be used to purchase office supplies, furniture, or related equipment for College employees who are not assigned to directly support and improve student equity and success.
8. Financial support may **not** be used to compensate (salary and benefits) of District and College employees who are not directly assigned to support and improve student equity and success as described in the College's approved Student Equity Plan and 2017-2019 Unified Plan: BSI, SE, and SSSP (e.g., Administrative Services, Business Services, Human Resources, Payroll, etc.).
9. Financial support may **not** be used to pay for legal or audit related expenses.
10. Financial support may **not** be used to pay for indirect costs (e.g., air conditioning, electricity, heat, or janitorial services).
11. Financial support may **not** be used to pay for unrelated travel costs for College personnel and students not assigned to directly support and improve student equity and success; or to participate in non-student equity activities or functions.
12. Financial support may **not** be used to purchase or lease vehicles.
13. Financial support may **not** be used to purchase clothing (e.g., athletic attire, jackets, sweatshirts, tee shirts, or graduation regalia).
14. Financial support may **not** be used to conduct for institutional research, institutional effectiveness, planning, and evaluation unrelated to improving student equity and success.
15. Financial support may **not** be used to supplant general or state funded categorical (restricted) district funds expended on student equity and success activities prior to the availability of student equity funding beginning in Fiscal Year 2014-2015. Supplanting rules do not apply to expenditures previously paid for by the Basic Skills Initiative (BSI), Student Equity (SE), or Student Success & Support Program (SSSP).