### Finish Line Grants Q&A

As the Finish Line Grants program is a new initiative, the North Carolina Department of Commerce Division of Workforce Solutions and the North Carolina Community College System Office continue to refine materials and processes. If you have a question or concern about the Finish Line Grants program that is not addressed below, please contact Dr. J.W. Kelley, Associate Vice President of Student Services, North Carolina Community College System, at <u>kelleyj@nccommunitycolleges.edu</u> or Danny Giddens, Assistant Secretary of Workforce Solutions of the North Carolina Department of Commerce, at <u>dgiddens@nccommerce.com</u>.

### 1. What is a Finish Line Grant?

Too often, financial emergencies like unexpected healthcare costs, childcare expenses, or car breakdowns prevent community college students who are on the cusp of completion from reaching that milestone. Finish Line Grants will help students complete their training when facing unforeseen challenges. Finish Line Grants can be used for course materials, housing, medical needs, dependent care, or other financial emergencies that students face through no fault of their own.

### 2. When will the program launch?

The first Finish Line Grants will be available to community college students in fall 2018.

### 3. Will Finish Line Grants be available at all community colleges?

Every community college in North Carolina may participate in the Finish Line Grants program but is not required to do so. Local community colleges will collaborate with their local workforce development board (WDB) to apply for funding. The community college, WDB staff, and NCWorks Career Center staff—the "partnership"—will work together to administer the Finish Line Grants program.

### 4. How will the local partnerships receive funding?

The local community college and their respective local WDB will jointly complete and submit a partnership proposal for funding, as described in the "Directions for Requesting Finish Line Grants Funding." If the proposal is approved by the North Carolina Department of Commerce Division of Workforce Solutions and the North Carolina Community College System, funding for Finish Line Grants will be made available.

### 5. Which entity will receive and disburse this funding?

If the partnership is approved, the local WDB will receive initial funding as soon as possible after approval of a partnership. The initial funding amount may be all or a portion of the amount requested with subsequent funding possible in the same school year depending on partnership needs and availability of funds. The WDB will be responsible for the disbursement of the Finish Line Grant funds.

### 6. Who is eligible for Finish Line Grants? **REVISED December 5, 2018**

Students enrolled in community colleges across North Carolina are eligible. Students must be in good academic standing and have completed (or be enrolled in) at least 75% 50% of their degree or credential program. Partnerships may choose to include additional criteria, such as enrollment in programs providing training for high-demand occupations.

Partnerships have broad discretion to choose enrollment criteria for Finish Line Grants because, as local leaders, you know what works in your community. We encourage partnerships not to restrict eligibility for grants only to students enrolled in certain programs. Eligibility should include students in as many educational and training pathways as possible.

#### 7. What is "good academic standing"? ADDED December 5, 2018

Students within a broad spectrum of academic achievement need assistance with financial emergencies. In no case should an eligibility requirement be greater than a 2.0 grade point average. Partnerships do not need to resubmit their application for this change.

### 8. Can Finish Line Grant funds be used to pay the student account debt of person attempting to return to college? **REVISED December 5, 2018**

*No. The purpose of the Finish Line Grant is to assist <u>current</u> students who have completed (or are enrolled in) at least 75% 50% of their degree or credential program.* 

#### 9. Can Finish Line Grant funds be used to pay the student's tuition, fees, or books? **REVISED** December 5, 2018

Maybe. In the context that the student's emergency has negatively impacted the student's ability to pay for tuition, fees, or books, then the partnership may approve the use of a Finish Line Grant for tuition, fees, or books. However, it is not the intent of Finish Line Grants to function as scholarships for tuition, fees, or books. For example, if a current student is within 75% 50% of completing a credential and has established a payment plan for tuition, yet his/her car breaks down resulting in not having sufficient money to make a tuition payment, then this would be an appropriate situation to use a Finish Line Grant to pay the tuition due at that time.

#### **10.** How much money will be available to fund the Finish Line Grant Program?

*Up to \$7 million of federal funds from the Workforce Innovation and Opportunity Act (WIOA) will be available for Finish Line Grants in the 2018-19 school year.* 

#### 11. Is this funding recurring?

Governor Cooper's most recent budget proposed recurring funding to make the Finish Line Grants program ongoing, including funding for students in four-year college and university programs. Future funding is contingent upon availability.

#### 12. How much funding will be available for individual students?

The maximum grant per student per semester is \$1,000. At the community college and local workforce development board partnership's discretion, students may be eligible for grant awards in more than one semester. Partnerships may choose to use other available funds to provide additional support to students who receive Finish Line Grants.

#### 13. How does a student apply for funding? REVISED December 5, 2018

Students should be able to access information about Finish Line Grants through any of the stakeholders engaged in the program. Students can contact their community colleges' financial aid offices, local WDBs, or NCWorks Career Centers. Each partnership must determine how best to connect students facing financial emergencies to Finish Line Grants.

For those partnerships without a co-located NCWorks office on campus, it is strongly suggested to make a case manager available to students on campus part time, based on need and/or establishing a process that allows for all necessary information to be consistently collected by a campus representative who then submits to NCWorks partner. Significant travel time can be an impediment to access, especially for students who lack reliable transportation.

#### 14. Does funding go directly to students?

Funds should not be distributed directly to students. For example, if a student applies for a Finish Line Grant to pay for a car repair, the approved payment will go to the car repair entity; if a student applies for a Finish Line Grant to cover an unexpected medical expense, the approved payment will go to the healthcare entity. Grants for gas and groceries may be distributed through gift cards as determined by the partnership.

#### 15. How will grant decisions be made?

The community college and local workforce development board will establish a standardized joint process for reviewing funding requests. Some community colleges already have a funding review process in place for emergency financial assistance available to students. The Finish Line Grants program encourages community colleges and local workforce development boards to build on existing emergency funding request review processes where they exist.

#### 16. What is the source of this funding?

*Resources for the Finish Line Grants program comes from federal Workforce Innovation and Opportunity Act (WIOA) Title I funds.* 

#### 17. Who is responsible for the funding and for student employment outcomes?

The WDB will be responsible for the WIOA funding. <u>Additionally</u>, the WDB must gather WIOA eligibility and related documentation from the student, enter data into NCWorks Online, provide ongoing case management services, and track the credential attainment and employment outcomes of the student. This student becomes the responsibility of the WDB for federal performance outcomes purposes.

# **18.** What happens if a student receives a Finish Line Grant and still fails to complete his or her training?

Grants will not be conditioned on students completing any additional requirements (e.g. community service hours) but every effort should be made to ensure that students are highly likely to continue their training. There will be no pay-back requirement unless it is determined that the student acted fraudulently in obtaining or using the Finish Line Grant. Community colleges and local workforce development boards may want to adjust their process of determining eligibility if it is found that students receiving Finish Line Grants frequently fail to complete training.

#### 19. How quickly will a student be able to get a Finish Line Grant?

Students often face financial emergencies that require timely response. The community college and workforce development board will establish a process to ensure student requests are evaluated and fulfilled within three business days. The three-day window begins when a student submits acceptable documentation as determined by the partnership.

#### 20. What are the reporting requirements for these grant funds?

The community college must submit to the workforce development board/NCWorks Career Center staff information on the academic progress of Finish Line Grant recipients, including whether each recipient remains in good academic standing and has completed his or her degree or credential, the category of student financial need (e.g. transportation, housing, dependent care, etc.), and any additional data required by the North Carolina Department of Commerce Division of Workforce Solutions on a monthly basis.

The workforce development board/NCWorks Career Center staff must report to the North Carolina Department of Commerce Division of Workforce Solutions the amount of funding disbursed, the number of students served, information on Finish Line Grant recipients' academic progress (as provided by the community college), recipients' employment outcomes, recipients' category of need, and any additional data required by the North Carolina Department of Commerce Division of Workforce Solutions on a monthly basis. Monthly reports should be e-mailed to <u>FinishLine@NCWorks.gov.</u>

#### 21. What about FERPA compliance?

The partnership MOU should outline the student data that will be shared between the partners and should only be data that is required for processing and evaluating the program. Further, a notification of data sharing should be on the student request form so that the student has been notified that his/her data will be shared by the partnership.

#### 22. Why does this program only apply to community college students?

Governor Cooper's budget provided \$20 million for Finish Line Grants to be made available for students at four-year public and private institutions, in addition to community college students. As the General Assembly failed to fund the Finish Line Grants program, Governor Cooper has made available up to \$7 million of federal WIOA funds that will specifically target community college students.

#### Finish Line Grants Q & A Updates – August 31, 2018

#### 23. Are all details of Finish Line Grants' procedures final?

No, Finish Line Grants procedures are a work in progress. Please make suggestions for improvements to North Carolina Department of Commerce, Division of Workforce Solutions and the North Carolina Community College System points of contact.

#### 24. What are the Workforce Innovation and Opportunity Act (WIOA) eligibility requirements?

It is expected that Finish Line Grant participants will be enrolled in WIOA Title I as Adults and must be 18 years of age or older; a citizen of or eligible to work in the United States; if male and subject to Selective Service, registered with Selective Service.

#### 25. How will participants be enrolled in NCWorks Online?

A service code, "FLG", will be entered and more details on the NCWorks Online enrollment is included on the NCWorks Online Staff Resources page.

#### 26. Will the WDBs disburse Finish Line Grants' payments to the providers of the emergency services? WDBs can provide the payments directly or the local college may make the payments and invoice the WDB for reimbursement. In all cases, sufficient documentation of expenses is required for audit purposes.

#### 27. Are Finish Line Grants considered WIOA Title I Supportive Services?

Yes. WDBs will need to follow or revise their existing Supportive Service Policy to be in agreement with this initiative or may develop a specific Finish Line Grants Supportive Services Policy.

#### 28. Do the WIOA Priority of Services requirements apply to Finish Line Grants?

Finish Line Grants are funded through WIOA state setaside funds and not subject to Adult Formula Priority of Services. WDBs may develop a Priority of Services policy for Finish Line Grants or may use existing local WDB Priority of Services policy; however, it is not required.

#### 29. Who is the Finish Line Grants contact person at the local community college?

A list has been developed and has been distributed.

#### 30. Are students enrolled in college transfer eligible for Finish Line Grants? REVISED December 5, 2018

It is a local decision on the inclusion of college transfer students. Partnerships have broad discretion to choose enrollment criteria for Finish Line Grants because, as local leaders, you know what works in your community. We encourage partnerships not to restrict eligibility for grants only to students enrolled in certain programs. Eligibility should include students in as many educational and training pathways as possible.

# **31.** Will NCWorks Online enrollment criteria use income to keep students from participating in Finish Line Grants?

The US Department of Labor continues to request information about family income, even when income is not a basis for program eligibility. Local partnerships may use one of the 3 approaches to address FLG participant income that are included on the NCWorks Online Staff Resources page.

#### 32. Will tracking of credentials obtained be done through NCWorks Online?

Yes, the FLG service code must be entered, codes for all services provided will be used, case notes maintained, and all credentials attained will be recorded in NCWorks Online.

#### 33. Who is to be listed in NCWorks Online as the provider for emergency payments?

That guidance is included in the Finish Line Grants instructions on the Staff Resources page in NCWorks Online.

### **34. Will there be additional funding to local areas for increased caseloads and administrative expenses?** *The Division of Workforce Solutions will consider additional means to meet needs generated by Finish Line Grants operations.*

#### 35. Please elaborate on medical needs that are appropriate for this project.

Finish Line Grants are for short-term emergency situations costing \$1,000 or less. For example, prescription eye glasses are broken, and funds are not available to the student for a new pair. Long-term medical situations should be addressed by other resources through referrals. Specific decisions on appropriate short-term medical emergencies will be determined locally.

### **36. Can Finish Line Grant funds be used for students' family members?**

The Finish Line Grants are focusing on the needs of students only.

### 37. Can payments be made directly to a participant?

It is anticipated students will not receive direct payments with the exceptions being, for example, gasoline or food cards, dependent on decisions made regarding the emergency by local partnership.

# 38. Can someone from out-of-state who attends a North Carolina Community College be eligible? Can someone from local workforce area attending a community college in another local workforce area be eligible?

WIOA Title I has no residency requirements. It is a local decision how workforce development boards approach service to out of area residents. The Finish Line Grants Memorandum of Understanding (MOU) should address any local restrictions related to residency.

# **39.** Is there a designated amount of Finish Line Grants' funds per community college or per local workforce area?

No. The intent of the Finish Line Grants is to serve the entire state in an equitable manner. While applications are encouraged to be submitted as soon as possible, fund allocations are not going to be determined by first come, first served. The Division of Workforce Solutions will review funding requests and expenditure rates to maintain an equitable distribution.

#### 40. Is there a budget template for the Finish Line Grants application?

The application des not request a line-item budget, but does ask for the level of funding the local partnership needs, along with planned use of the funds.

#### 41. Will Finish Line Grants be operated in-house by local WDBs or by local WIOA contractors?

Finish Line Grants' participants will receive case management services, so it is anticipated at some stage that participants will be working with WIOA contracted services staff. The details of who performs enrollment into NCWorks Online and other roles will be determined locally.

#### 42. Is there flexibility in the 72 hour requirement to fulfill requests?

It is the intent of the Finish Line Grants to evaluate and determine responses to students' requests within three business days since the purpose is to meet true emergency situations.

# **43.** If a community college works with more than one local workforce development board, can there be one application for that college?

Perhaps, if both local workforce development boards use the exact same process for Finish Line Grants. Otherwise, it will be clearer to have the community college enter into the application with each workforce development board.

#### 44. Does the 75% 50% completion requirement include the current enrolled semester? REVISED December 5, 2018

Yes, each community college will count the classes enrolled in current semester toward the 75%. 50%. Community colleges will verify that applicant students meet the requirement.

#### 45. May local partnerships specify the training areas of students that receive for Finish Line Grants? **REVISED December 5, 2018**

Yes, local community colleges and workforce development boards may specify additional requirements such as students must be enrolled in programs of study that lead to high demand occupations. Partnerships have broad discretion to choose enrollment criteria for Finish Line Grants because, as local leaders, you know what works in your community. We encourage partnerships not to restrict eligibility for grants only to students enrolled in certain programs. Eligibility should include students in as many educational and training pathways as possible.

46. What if a student applicant is pursuing a double major, do both have to meet the 75% 50% completion requirement? REVISED December 5, 2018

Local partnerships will make the final decision. It is anticipated that if one of the programs is within the  $\frac{75\%}{50\%}$  completion requirement, the student is a candidate for Finish Line Grants.

- **47. What if a student already has a degree and is enrolled in another program, is this student eligible?** *Having an existing degree is not a disqualification.*
- **48.** Are students in short-term programs that lead to credential and likely employment eligible? *Yes, if the local partnership does not set a restriction.*
- **49.** Are students who are enrolled in more than one community college eligible? *Yes, if the local partnership does not set a restriction.*

### Finish Line Grants Q & A Updates - October 16, 2018

#### 50. May a FLG Partnership purchase gas or grocery cards in advance?

Yes, if this is permissible under the financial policies of the entity making the purchase and follows established procedures. It is recommended that limited cards be held on hand, appropriate care taken for the security of the cards and that recipients sign for the amount of card value received. Note, cards purchased in the current program year cannot be carried over into the next program year.

#### 51. Is there a state wide logo for Finish Line Grants?

There is no state wide logo. The name "Finish Line Grants" is the state-wide identifier. If you wish to add a logo, that is local call. Given the nature of the funds being used for emergencies where something unfortunate has happened, any logo should be in keeping with the circumstances.

# 52. Should financial aid offices vet potential awards for people receiving student aid (e.g., Pell Grant, Student Loans, etc.)?

Yes. Based on information from the North Carolina Community Colleges System Office, financial aid officers should review potential FLG awards because receiving an award could impact the cost of attendance and the un-met need of the student. The scenarios are complex and are best evaluated by financial aid officers.

# 53. What happens when students have valid emergencies and need but have not completed 75% 50% of their program? REVISED December 5, 2018

Those students, while not eligible for Finish Line Grants, should receive referrals to available assistance. Whenever Finish Line Grants are not able to meet students' requests, it is the intent of the initiative to connect students with other options.

# 54. Can a FLG student applicant who is currently a WIOA Dislocated Worker participant be enrolled in the Finish Line Grants activity without having to enroll as a WIOA Adult?

Yes, the student will still need to be enrolled in the Statewide Adult category since the WIOA funds for FLG are statewide activities funds. Question 23 in the Finish Line Grants Q & A series notes that it is expected that FLG students will be enrolled as Adults and that statement is applicable to students who are not already in WIOA.

- **55. May the Finish Line Grants options for documenting income be used for other WIOA programs?** No. The information provided on Finish Line Grants is specific to Finish Line Grants participants. Programs issue specific information relevant to each program based on type of funding, program requirements and objectives.
- **56.** Are tires considered "normal vehicle maintenance" and therefore not an allowable FLG expense? Each local partnership will determine allowable FLG expenses within the scope of the federal WIOA funds and any categories the partnership agreed upon for use of FLG. Application of reasonable common sense could consider replacing a shredded tire an emergency and while replacement of 4 tires experiencing regular wear as normal vehicle maintenance.
- 57. May Workforce Development Boards' WIOA contractors make FLG payments and be reimbursed by the WDB, or may only community colleges and WDBs make payments as referenced in Question #25 of Finish Line Grants Questions and Answers?

Yes, Finish Line Grants Partnership Proposals may designate WIOA contractors to make payments. Reimbursement will be made by the Workforce Development Boards following established procedures with their contractors.

#### 58. Can a public relations campaign regarding the Finish Line Grants be conducted?

Outreach to inform students of the availability of Finish Line Grants may be conducted with federal funds. Unallowable advertising and public relations expenses with federal funds are detailed in US Office of Management and Budget Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Funds 2 CFR 200.421. General advertising, public relations and marketing activities may be conducted with non-federal resources.

### Finish Line Grants Q & A Updates – December 20, 2018

# **59.** Are there suggestions on ways to streamline the WIOA Title I enrollment process and make it less burdensome on the student?

Local partnerships should seek ways to make the WIOA eligibility/enrollment as efficient as possible. Those may include:

- Confirming that all appropriate staff understand the eligibility/enrollment process and the documents required
- *Clearly publicizing the eligibility for the program and the documents that a student must provide*
- Having eligibility/enrollment staff easily accessible to the students on campus; including having case managers on campus
- Having dedicated space on campus for the eligibility/enrollment process

# 60. We want to enroll students that are in longer term training programs, but how do we keep them on our caseload until they complete training?

WIOA rules state that a WIOA program participant (student) must be provided a WIOA-recognized service at least every 90 days or the student will be "exited" from the WIOA database. That exit then starts a 6 month and a 12 month clock when WIOA measures a student's employment outcome and median earnings. The student is expected to be working at both the 6 month and the 12 month points after exit. This process is how the program performance of each WDB is measured.

FLG students that are in longer term training and enrolled in WIOA must be provided services at least every 90 days until graduation or they will be exited 90 days after the FLG assistance is provided. In the latter case, the WDB will hope that the student is employed in a good job while continuing to attend school.

# 61. Is there fiscal guidance for the procurement and purchase of goods and services using FLG funding?

<u>Micro-Purchase Option – Threshold</u>: \$0 - \$2,500. An acquisition of products or services where the aggregate amount does not exceed \$2,500. An exception to the formal procurement method is the case of purchases less than or equal to \$2,500 (i.e., micro purchases) or other lower threshold set by WDBs as they deem appropriate for purchases in their policies. Purchases below that threshold may be made without soliciting competitive price or rate quotations if the price is considered to be reasonable. A reasonable price may be by comparing to a previous purchase, personal knowledge of the item being purchased, or by comparing to similar items being purchased. Records still need to be kept for all purchases regardless of the procurement method used, including micro-purchases. Also, to the extent practicable, micro-purchases must be distributed equitably among qualified suppliers.

#### 62. Is the 2.0 GPA in the major or is it a cumulative GPA?

That should be a local call. Please make the decision in the best interest of student.

### 63. Can students receive tuition assistance if their Financial Aid is exhausted or in order to re-enroll for their last semester?

Using an FLG to help a student with tuition and fees is allowable but FLGs are not meant to be an ongoing source of tuition funding.

# 64. What is considered as an enrolled student? For instance, since school is not currently in session, can a student registered for Spring 2018 classes apply now for the FLG?

Yes, a student registered for Spring 2018 classes can apply now and receive FLG assistance before the start of next semester classes. The same is likely to be true between the spring and fall semesters; confirmation of this will be shared before the end of the spring semester.

#### 65. Can a student bring the bill without a disconnection/eviction notice?

Yes, a disconnection/eviction notice is not required for an FLG.