

## Teacher-in -the-Workplace Technical Guidance Regarding Employer and School Cost Reimbursements

The PA Department of Labor & Industry obtained clarification regarding the use of stipends under the Teacher-in-the-Workplace grant:

- While direct stipends are not permissible, the reimbursement of costs incurred for the participation of educators or employers is allowable, provided they follow the criteria of allowable costs under Uniform Guidance. Documentation for these costs must be provided. Please see the examples and note below.
- For the purposes of this grant, the individuals who will be participating in these projects are not “participants” as defined under the Workforce Innovation and Opportunity Act.

The Local Workforce Development Board serving as the fiscal agent and lead applicant can assist interested educators and businesses with determining allowable costs.

**Example 1:** Employer A is hosting a group of teachers and faculty at their facility for the week. The weeklong event will be a mix of shadowing, tours, and one-on-one with subject matter experts (SME) at the facility to bridge the gap between education and business. The tour is being conducted by Marsha, the plant Floor Manager. Employer A will be bringing in a replacement for Marsha while she shows the tour group around. Additionally, Employer A is allowing their 3<sup>rd</sup> shift staff to participate in the SME discussions during the 1<sup>st</sup> shift with the teachers and faculty. Employer A will be paying the SMEs for their participation time.

The cost to replace Marsha while she is showing the tour group around and the payroll costs for the SMEs to participate in the discussions is allowable if the company is consistently following their policies for wage, hours worked, and overtime, etc. The company cannot charge the federal grant more than it would normally pay the employees.

**Example 2:** Institution A’s faculty and teachers are participating in a weeklong event at Employer A which will be a mix of shadowing, tours, and one-on-one with SMEs at the facility to bridge the gap between education and businesses. The teachers will be paid for participation as a part of their regular salary. The school will be incurring the costs of a substitute for the week. The school may request reimbursement for the cost of the substitute for the week.

**NOTE:** The following criteria must also be considered in conjunction with the previous programmatic examples for the cost to be allowable.

Except where otherwise authorized by statute, costs must meet the following general criteria in order to be allowable under Federal awards:

1. Be necessary and reasonable for the performance of the Federal award and be allocable thereto under these principles.
2. Conform to any limitations or exclusions set forth in these principles (Uniform Guidance) or in the Federal award as to types or amount of cost items.
3. Be consistent with policies and procedures that apply uniformly to both federally-financed and other activities of the non-Federal entity.
4. Be accorded consistent treatment. A cost may not be assigned to a Federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the Federal award as an indirect cost.
5. Be determined in accordance with generally accepted accounting principles (GAAP) except for state and local governments and Indian tribes only, as otherwise provided for in this Part.
6. Not be included as a cost or used to meet cost sharing or matching requirements of any other federally financed program in either the current or a prior period.
7. Be adequately documented.