

## Student Equity and Achievement Program Expenditure Guidelines

### KEY STATUTES AND INTENT

It is the intent of the Legislature that Student Equity and Achievement (SEA) Program funds be used to support California community colleges in implementing activities and practices aligned with the California Community Colleges Guided Pathways Grant Program and in advancing the systemwide goal of eliminating achievement gaps for students from traditionally underrepresented groups.

Districts and colleges must ensure expenditures are consistent with SEA statutory requirements prescribed in [Education Code 78222](#), local Student Equity Plans, and Chancellor's Office Expenditure Guidelines. Within these parameters, districts and colleges have the discretion and flexibility to make local decisions regarding the use of SEA funds across credit and noncredit programs.

A college's Student Equity Plan serves as the foundational framework for SEA expenditure decisions. Consistent with [Education Code 78222](#) and [Education Code 78221](#), SEA funds are provided to support implementation of the activities and goals specified in a college's current Student Equity Plan. Priority must be given to expenditures that align with and advance the plan's goals, activities, strategies, and intended outcomes.

[Education Code 78222 - SEA Program](#) supersedes the three statutes of the predecessor programs but does reference those education code sections. Below are links to applicable codes to the SEA Program:

- [Education Code 78222 - SEA Program](#)
- [Education Code 78221.5 - Students' Rights to Transfer-Level Coursework](#)
- [Education Code 78221 - Student Equity Plans Allocation Methodology \(pre-SEA\)](#)
- [Education Code 78220 - Student Equity Plan](#)
- [Education Code 78213 - Student Matriculation](#)
- [Education Code 78212 - Student Success and Support Program](#)
- [Education Code 88921- Guided Pathways](#)
- [Education Code 88815 - Student Success for Basic Skills Program](#)

SEA Program funds are Proposition 98 funds and districts and colleges are strongly encouraged to spend funds within the same year they are allocated. Any unspent SEA funds should be spent by the end of the second year following the allocation year. Timely expenditure of SEA funds is essential to supporting student success initiatives and addressing local student needs. Please refer to [Effective Use of Prop 98 Spending Guidance Memo](#). To receive support with developing a spend-down plan, please contact the Chancellor's Office SEA Program Team at [SEAProgramInfo@CCCCO.edu](mailto:SEAProgramInfo@CCCCO.edu).

## **REASONABLE AND JUSTIFIABLE**

All expenditures must 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 and its associated Student Equity Plan and are reasonably designed to improve equitable student outcomes. 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.

## **LOCAL RESPONSIBILITY, REVIEW AND DOCUMENTATION**

Districts and colleges are ultimately responsible for expenditure decisions. SEA expenditures are subject to audit and review. SEA expenditures may be reviewed by the Chancellor's Office, the California State Auditor, or other government agencies with a lawful interest in the expenditure of funds. The Contracted District Audit Manual (CDAM), which is updated annually by the Chancellor's Office, provides guidance regarding the annual audits performed by district-contracted auditors.

Districts and colleges are encouraged to establish an internal review process involving program leadership, administration, business officers, and legal counsel, as appropriate, and to maintain sufficient documentation supporting expenditure decisions for audit and compliance purposes.

## **INDIRECT EXPENSES**

Districts and colleges may reserve up to 4% of their allocation for indirect expenses. However, districts and colleges are encouraged to maximize the use of SEA funds for direct student services, student support activities, and institutional practices that advance equitable student outcomes. Indirect expenses should be reasonable, necessary, and clearly connected to SEA Program implementation.

## **EXAMPLES OF ALLOWABLE AND NON-ALLOWABLE EXPENDITURES**

The Chancellor's Office does not provide an exhaustive list of allowable and non-allowable expenditures, as expenditure decisions must be made locally based on program objectives, planned activities, and the "reasonable and justifiable" criteria outlined above.

The examples below are provided as guidance and are not intended to encompass every potential expenditure scenario. Ultimately, districts and colleges remain responsible for determining whether a specific expenditure is reasonable, justifiable, and consistent with applicable laws, regulations, district policies, and SEA Program requirements.

## EXAMPLES OF ALLOWABLE EXPENDITURES:

1. **SEA PROGRAM STAFFING AND PERSONNEL COSTS**  
Salaries, wages, and benefits for personnel who directly support SEA Program implementation are allowable. This may include SEA coordinators, directors, counselors, faculty, classified professionals, researchers, administrators, student employees, and other personnel whose duties are directly related to implementing SEA and Guided Pathways activities, advancing Student Equity Plan goals, or monitoring program outcomes. Colleges and districts must be able to document staff time and effort charged to the program. Costs for employees partially assigned to SEA activities should be prorated accordingly.
2. **COUNSELING, ADVISING, AND STUDENT SUCCESS SERVICES**  
SEA funds may be used to support counseling, advising, student education plan services, and other student success services that advance Student Equity Plan goals and SEA Program objectives. Allowable costs may include educational planning workshops, tutoring, transfer support, career exploration activities, and other services that help students successfully navigate their educational pathways.
3. **EARLY ALERT, FOLLOW-UP, AND STUDENT INTERVENTION SERVICES**  
SEA funds may be used to support retention and intervention efforts that promote student success and equitable outcomes. Examples may include case management, focused outreach for student groups identified in the Student Equity Plan, referral services, [student emergency financial assistance per Ed Code 78220 \(e\)](#), basic needs interventions, food pantry support, and other service activities designed to address barriers that may negatively affect student persistence and educational attainment.
4. **ORIENTATION, ONBOARDING, AND TRANSITION SERVICES**  
SEA funds may be used to develop and provide orientation, onboarding, student transition services, and services designed for English language learners, including multilingual orientation materials, workshops, and translation services.
5. **MULTIPLE MEASURES AND PLACEMENT SUPPORT**  
SEA funds may be used to support activities, technology, services, and personnel related to multiple measures placement and student access to transfer-level English, transfer-level mathematics, and academic credit ESL coursework, consistent with [Education Code 78221.5](#).
6. **SUPPLIES, MATERIALS AND COMMUNICATIONS**  
Reasonable costs for supplies, materials, printing, postage, and communication tools that directly support SEA Program activities and objectives are allowable. This may include materials used to support student outreach, onboarding, orientation,

educational planning, career exploration, transfer services, equity-focused initiatives, Guided Pathways implementation, and Student Equity Plan activities.

7. TECHNOLOGY, SOFTWARE, AND EQUIPMENT

SEA funds may be used to purchase computer hardware, software, technology, and equipment that directly supports SEA Program implementation. Examples may include educational planning software, degree audit systems, early alert platforms, student communication tools, and other technology that advances student success and equitable outcomes. Technology and equipment purchases should be proportional to program need, directly support SEA Program goals and activities, and be managed in accordance with local district inventory and disposal policies.

8. TRAVEL, TRAINING, AND PROFESSIONAL DEVELOPMENT

SEA funds may be used to support registration fees, travel, lodging, speaker fees, and other reasonable expenses, consistent with local district policies, for training or professional development activities that directly support SEA Program, Student Equity Plan, or Guided Pathways implementation.

9. OTHER SEA PROGRAM ACTIVITIES

SEA funds may be used to support other activities and expenditures not specifically identified in these guidelines, provided they are reasonable, justifiable, support implementation of a college's Student Equity Plan, and are consistent with SEA Program objectives and applicable requirements.

**EXAMPLES OF NON-ALLOWABLE EXPENDITURES:**

1. GIFTS

SEA funds cannot be spent on gifts or monetary awards of any kind. Expenditures that directly support a legitimate educational or public purpose consistent with SEA Program objectives, such as food vouchers provided through a student emergency aid program or basic needs centers, for students are not considered a gift of public funds.

2. STIPENDS FOR STUDENTS

SEA funds cannot be used to pay participation stipends or attendance incentives to students for participating in campus, classroom or program activities. This restriction does not apply to allowable emergency assistance, basic needs support, transportation assistance, food assistance, or similar student support expenditures that are designed to address documented barriers to student success and are consistent with SEA Program objectives and district policy.

3. POLITICAL CONTRIBUTIONS

SEA funds cannot be used for any form of lobbying, political activities, political contributions, or campaigning activities.

4. COURSES

SEA funds cannot be used to fund the direct delivery of courses that generate full-time equivalent students (FTES) and are otherwise supported through state apportionment. SEA funds may be used to support instructional support activities, interventions, and services that advance SEA Program goals and are not otherwise already funded through apportionment.

5. SUPPLANTING

SEA funds must supplement, not supplant, existing institutional resources. SEA funds may not be used to replace, offset, or relieve a district or college from costs that are part of its ongoing operational responsibilities or that would otherwise be supported through general funds or other local, county, state, or federal funding sources.

## CONTACT

To receive support with developing a spend-down plan or exploring allowable expenditures for SEA funds, please contact the Chancellor's Office SEA Program Team at [SEAProgramInfo@CCCCO.edu](mailto:SEAProgramInfo@CCCCO.edu).