

# Perkins Permissible Uses of Funds

Presented by the ICCB CTE & ICSPS Staff  
Wednesday, December 6, 2017

# AGENDA

- Required Uses of Perkins Funds
- Permissible Uses of Perkins Funds
  - Most Common Uses
  - Most Frequently Asked Questions
- Determining Proportionate Use
- Unallowable Uses of Funds
- Supporting Special Populations
- Documentation
- Resources

# THE PERKINS ACT

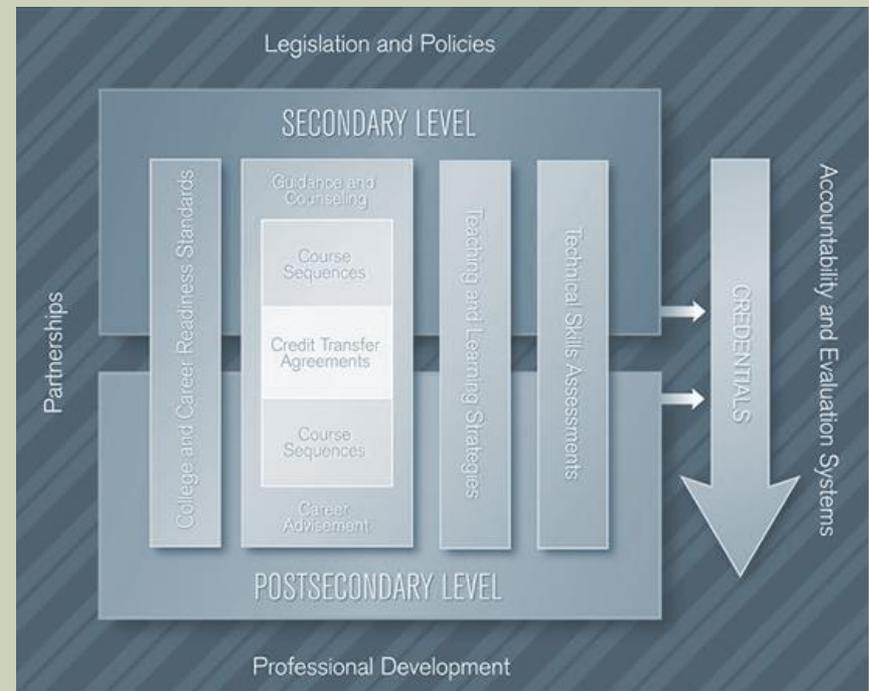
- Carl D. Perkins Career and Technical Education Improvement Act of 2006
  - Federal Act
  - Currently awaiting reauthorization
- Purpose:
  - Strengthen and enhance CTE programming.
  - Develop more fully the academic and career and technical skills of secondary and postsecondary education students who elect to enroll in career and technical education programs.
  - Strengthen secondary to postsecondary transitions.
- Sub-recipients:
  - Local high school districts (ROE/EFE)
  - Community colleges

# REQUIRED USES OF FUNDS

# REQUIRED USES

- Section 135b of the Carl D. Perkins Act of 2006 outlines the nine required uses of funds
- All of the nine required uses have been integrated into the Perkins Plan
- Detailed Required Use information can be found in the ICCB's Carl D. Perkins Postsecondary CTE Grant Manual

OCTAE's Programs of Study Design Framework



# REQUIRED USES

- 1) Improve CTE program components through the **integration of academics with technical programs** through a coherent sequences of courses, such as CTE programs of study, to ensure learning in core academic and CTE subjects. (*Principle 4, Element a*)
- 2) Link CTE at the secondary and postsecondary levels, by offering the relevant elements of not less than one (1) career and technical **program of study**. (*Principle 3*)
- 3) Provide students with strong experience in, and understanding of, all aspects of industry, which may include **work-based learning** experiences. (*Principle 2, Elements a & b*)
- 4) Develop, improve, or expand the **use of technology in CTE**. (*Principle 4, Element c*)

# REQUIRED USES

- 5) Provide **professional development** programs that are consistent with Section 122 to secondary and postsecondary teachers, faculty, administrators, and career guidance and academic counselors who are involved in integrated CTE programs. *(Principle 5)*
- 6) Develop and implement **evaluations of the CTE programs** carried out with funds under the Perkins Act, including an assessment of how the **needs of special populations** are being met. *(Principle 6, Elements a, d, & e)*
- 7) **Initiate, improve, expand, and modernize** quality CTE programs, including relevant technology. *(Principle 6, Element b)*
- 8) Provide services and activities that are of **sufficient size, scope, and quality** to be effective. *(Principle 6, Element c)*
- 9) Provide **activities to prepare Special Populations** who are enrolled in career and technical education programs for high-skill, high-wage, or high-demand occupations that will lead to self-sufficiency. *(Principle 2, Element f)*

# PERMISSIBLE USES OF FUNDS

# PERMISSIBLE USES

- Section 135c of the Carl D. Perkins Act of 2006 outlines the Permissible Uses of Funds
- All nine Required Uses of Funds must be met before recipients can use funds for permissible activities
- Most elements of the Permissible Uses are included within the Perkins Plan
- Detailed Permissible Use information can be found in the ICCB's Carl D. Perkins Postsecondary CTE Grant Manual

# PERMISSIBLE USES

- 1) Engaging parents and community (business and industry) partners (*advisory committees*)
- 2) Providing career guidance and academic counseling
- 3) Local education and business partnerships (*work-based learning, faculty externships*)
- 4) Provide programs to special populations students
- 5) Assist CTE Student Organizations (*purchasing supplies/ equipment or instructional activities*)

# PERMISSIBLE USES

- 6) Mentoring and support services (*tutoring, resume/interview workshops, onsite childcare*)
- 7) CTE Equipment purchases and upgrades
- 8) Teacher prep programs (*professional development around integration, faculty mentoring for transition from business/ industry to teaching*)
- 9) Utilizing distance education (*distance learning technology, support services for implementation*)
- 10) Initiatives that facilitate the transition of CTE students into baccalaureate degree programs (*articulation agreements, dual credit/enrollment, academic/financial aid counseling*)

# PERMISSIBLE USES

- 11)** Supporting entrepreneurship education and training
- 12)** Develop/improve new CTE courses and programs of study (*utilizing the expectations tool, program review, student feedback*)
- 13)** Develop/support career-themed learning communities
- 14)** Provide support for family and consumer science programs
- 15)** Provide CTE programs for out of school youth and adults (*support to complete secondary education, upgrade technical skill set*)

# PERMISSIBLE USES

- 16) Assist students in continuing education or training to find an appropriate job
- 17) Support training and activities in nontraditional fields (*mentoring, outreach*)
- 18) Provide support for training programs in automotive technologies (*apprenticeships*)
- 19) Collaborating with other Perkins recipients for innovative initiatives (*establishing/enhancing data initiatives, implementing POS, professional development activities*)
- 20) Supporting other CTE activities that are consistent with the purpose of Perkins

# PARAMETERS OF SPENDING FEDERAL DOLLARS

All costs must be necessary, reasonable, and allocable. A good rule to use is to ask yourself, “If this purchase was on the front page of the newspaper tomorrow, would I be able to justify and defend that it was necessary, reasonable, and allocable?”

**HEADLINES  
TODAY**

# COMMON USES OF FUNDS

- Instructional/Staff: provide dollars for instructional/staff support such as CTE tutors, Perkins Coordinators, instructors of new programs, Dual Credit Coordinator (partial), and Special Populations Coordinators, etc.
  - We encourage personnel and benefits expenditures to be no more than 75% of total allocation.
- Stipends: curriculum development, project/initiative management, etc.
- Equipment: for CTE programs
- Professional Development: provide financial assistance for CTE faculty and staff to attend training sessions and conferences as well as host in-house CTE-related professional development.
- Travel: Travel for CTE-related professional development and events.
- Special Populations Support: support activities that assist special populations students to overcome barriers to success.

# FREQUENTLY ASKED QUESTIONS: *FOOD*

There is a high burden of proof to show that providing food assists in meeting goals and objectives. Grantees must adhere to the Code of Federal Regulations.

If costs are *reasonable and necessary*, food can be purchased for meetings/trainings where disseminating technical information is the primary purpose.

- Allowable: working lunches for an all-day working event
- Unallowable: pizza party for students

# FREQUENTLY ASKED QUESTIONS: *TRAVEL*

- Perkins dollars may be used to pay for travel expenses. The following guidelines apply and colleges should adhere to Federal Regulations.
  - Travel must be directly related and integral to a CTE staff member or an instructor in a CTE field.
    - Allowable: welding instructor attending national welding conference
    - Unallowable: Registrar attending a financial aid conference
  - Travel must meet the overall goals of Perkins (should relate to a required or permissible use of funds)
    - Unallowable: an Automotive instructor going to a symphony
    - Unallowable: Administrators attending Higher Learning Commission conference
- **NOTE: International travel is unallowable.**
- **Reimbursement for travel on grants must be consistent with institutional policies and must not be more than that of institutional reimbursement.**

# FREQUENTLY ASKED QUESTIONS: *STUDENT TRAVEL*

- Student travel:
  - **Allowable:** Perkins funds can be used to cover the cost of travel for a class of students traveling to a CTE-related professional conference or workshop that is an integral part of the program. Travel costs may include conference and meeting expenses and travel.
    - Bussing to a local business and industry sites.
  - **Unallowable:** Perkins funds cannot be used to pay for an individual student's activities or efforts, unless that student is a member of a special population, as defined by Perkins, and the activity attempts to overcome a barrier for this student. This is considered direct student support which is allowed only in limited circumstances.
    - **Exception:** A low-income student who may not be able to afford travel costs to a technical skills competition.

# FREQUENTLY ASKED QUESTIONS: *DIRECT STUDENT SUPPORT*

## **Students are never to receive Perkins funds directly, *HOWEVER:***

- Perkins funds may be used to provide limited direct assistance (e.g. transportation, childcare, textbooks, supplies) to students who are members of a Special Population as defined by Perkins.
- The following conditions must be met:
  - Students must be a member of a Special Population and must be participating in a career and technical education program.
  - Assistance is provided to address an overwhelming barrier to successful participation.
  - Assistance must be part of a larger set of strategies to address the needs of the Special Population.
  - Funds must *supplement and not supplant* assistance that is otherwise available from non-federal sources.
- Colleges must document each case and outline a long-term solution.
- ***No more than 10% of Perkins funds can be allocated to student support.***

# FREQUENTLY ASKED QUESTIONS: ADMINISTRATIVE OR CLERICAL STAFF

- **General Administration:** organized administrative activities that provide assistance and support to CTE students, including activities specifically designed to provide administrative or managerial support for CTE programs and any special services provided for CTE students.
  
- **Salaries of administrative and clerical staff should be treated as “indirect” unless all of the following are met:**
  1. Such services are integral to the activity
  2. Individuals can be specifically identified with the activity
  3. Such costs are explicitly included in the budget
  4. Costs not also recovered as indirect

# SPECIAL POPULATIONS

- **Include:**
  - **Single parents**  
(including pregnant and parenting teens)
  - **Displaced homemakers**
  - **Individuals with disabilities both cognitive and physical**
  - **English Language Learners**
  - **Economically Disadvantaged**
  - **Students pursuing nontraditional occupations for their gender**

# SPECIAL POPULATIONS

The 2006 Perkins law reads local funds are required to be used...

- To provide activities to prepare special populations, including single parents and displaced homemakers who are enrolled in CTE programs for high skill, high wage, or high demand occupations that will lead to self-sufficiency.

Local funds are permitted to be used

- to provide programs for special populations.

# SPECIAL POPULATIONS

- How would Perkins support special populations students?
  - Support Groups for the Special Population
  - Recruitment marketing efforts
  - Mentoring program
- Types of expenses incurred that are allowable
  - Tutors
  - Marketing Materials/ Recruitment
- Ways to partner to provide services and minimize cost
  - Lending Library
  - Partnerships for scholarship
  - Partnership to provide child care, and equipment for CTE classes

# PROPORTIONATE USE OF FUNDS

- It may be appropriate for Perkins funds to supplement or proportionally fund various initiatives and activities.
- Commonly braided sources
  - WIOA Title I
  - Adult Education and Family Literacy (WIOA Title II)
  - Institutional funding sources
  - Perkins secondary funding
- Colleges can use historical or predicted data to proportionally support an activity.

## Examples:

1. The college wants to build a computer lab that will be used by both CTE and non-CTE programs.
2. Bridge and Integrated Education and Training (IET) programs.

# UNALLOWABLE EXPENSES

## General Grant Guidelines

- Donations or fundraising activities
- Alcoholic beverages
- Lobbying activities

## Perkins-specific

- Student publications or intramural activities
- Reserving grant funds for emergency purposes
- Gifts/prizes/rewards for students or instructors
- Developmental education
- Adult education instruction and supports
- Transfer-level instruction
- Non-CTE programs and activities
- Tuition and fees

# UNALLOWABLE EXPENSES: *SUPPLANTING*

Federal law prohibits recipients of federal funds from replacing state, local, or agency funds with federal funds. Existing funds for a project and its activities *may not* be displaced by federal funds and reallocated for other organizational expenses.

- Did you pay for the cost last year with non-federal funds?
- Example: X College has paid for X College's CTE Day-related expenses for many years. This year, the college wanted to free up funding for a student service initiative and put CTE Day expenses on a federal grant.



**Supplanting**

# IMPORTANCE OF DOCUMENTATION

- Why should you document?
  - It is important for recipients of federal dollars to appropriately document expenditures.
  - Appropriate documentation and oversight prevents fraud, waste, abuse.
  - This may protect the recipient during fiscal monitoring and audits.
- How should you document?
  - Time and effort reporting
  - Be specific in your Perkins Plans
  - Save records of prior approval
- Tips:
  - Proper file maintenance
  - Do not deviate from policies and procedures



# FUNDING DEADLINES

**June 30<sup>th</sup>:** Grant funds must be obligated

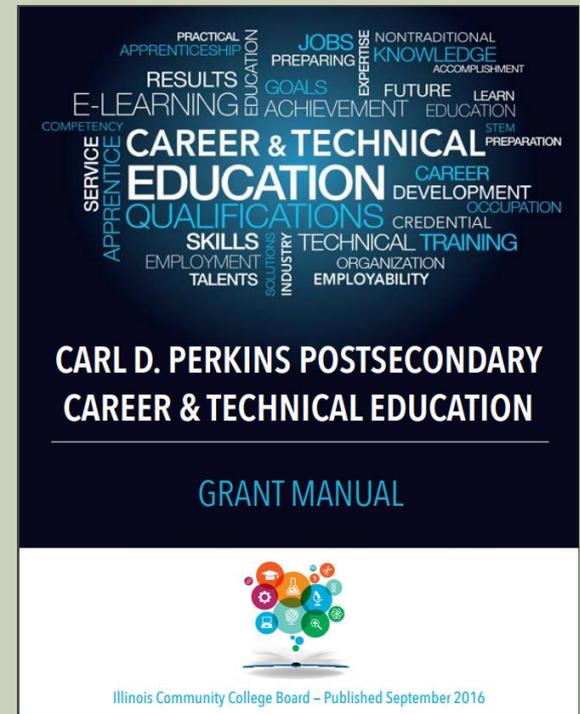
**June 30<sup>th</sup>:** Goods/products must be ordered and services must be rendered

**August 1<sup>st</sup>:** Grant funds must be requested

**August 31<sup>st</sup>:** Grant funds must be expended and all goods/products received

# RESOURCES

- [ICCB CTE website](#)
- [Postsecondary Perkins CTE Grant Manual](#)
- [Illinois Center for Specialized Professional Support](#)
- [OCTAE](#)
- [EDGAR](#)
- [USDOE Meetings and Food FAQ](#)
- **Federal Travel Regulations**
  - <https://www.gpo.gov/fdsys/pkg/CFR-2011-title2-vol1/xml/CFR-2011-title2-vol1-part220.xml>
  - <https://www.gpo.gov/fdsys/pkg/CFR-2011-title2-vol1/xml/CFR-2011-title2-vol1-part225.xml>
  - <https://www.gpo.gov/fdsys/pkg/CFR-2011-title2-vol1/xml/CFR-2011-title2-vol1-part230.xml>



# QUESTIONS?

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