



PERKINS MANUAL

Effective Date: July 1, 2022



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Arkansas DCTE Mission

To prepare students for future college
and career success

Arkansas DCTE Vision

To be a model for career and
technical education

[DCTE Staff Directory](#)

Arkansas Department of Education Division of Career and Technical Education

CTE Coordinator Expectations

Career and Technical Education Coordinators provide supporting resources to enable public schools to initiate and maintain quality CTE programs in accordance with the Arkansas Department of Education, Division of Career and Technical Education's Policies and Procedures and Federal Requirements and Guidelines.

The CTE Coordinator legally binds the district/cooperative regarding the Federal Perkins funds and encourages the development, implementation, and improvement of CTE programs for all districts (consortia or single LEA) in the service delivery area through the following job tasks:

Data Collection/Reporting

- **Concentrators/Completers:** oversee identification, distribute completer seals and certificates.
- **Ensure** certification data are collected
- **Placement:** verify and complete placement report provided by DCTE, submit final/completed report to DCTE
- **Develop** improvement plans as indicated by the State.

Program Review

- **Annual Assurances:** Assist schools in preparation and assist teachers/schools preparing documentation annually for digital submission
- **Tiered Support:**
 - Coordinate the reporting system for districts,
 - Identify safety issues,
 - Attend all visits for all schools in the Co-op,
 - Assist District Administration in addressing critical identified risk elements,
 - Follow-up on resolving identified critical elements
- **Data pull:** review and follow-up on data pull information provided by DCTE on schools/teachers
- **Course codes:** review codes and report changes every semester

Technical Assistance

- **Professional Development:**
 - Plan, prepare, organize, and collaborate with DCTE program coordinators to support teachers/administration/counselors/support staff. Topics and areas should include, but are not limited to:
 - New programs,
 - New teachers,
 - Special needs/populations,
 - Career guidance/student success plans,
 - School report cards,
 - State initiatives,
 - Technology/equipment training,
 - Comprehensive local needs assessments,
 - Perkins V.
- **New Teacher Assistance:** inform new teachers of:
 - DCTE rules/regulations/requirements,
 - Annual assurances documentation required,
 - Importance of CTSO, and
 - Requirements, accountability of requirements of Perkins V indicators and measures

- **Policy and Procedure Interpretation:** assist schools/educators with recognizing and understanding policy and procedure regulations/requirements
- **Support for special populations:** provide training and resources for support of special populations
- **Start-up grant support:** work with schools on developing grant proposals utilizing labor market data and labor market needs of region, assist with equipment inventory of grants-ensure labeling/placement/availability of equipment for Start-up grants, identify existing resources

CTE initiatives Support

- **Career Clusters/Pathways/Programs of study:** develop/plan/implement with schools/teachers using labor data and community/regional needs
- **Curriculum Standards:** support/assist in developing standards
- **Career Planning Systems:** Assist/plan/develop
- **Academic Attainment of CTE students:** Assist with data disaggregation, school report cards, assist/plan/develop program improvement activities
- **Statewide Initiatives:** work cooperatively with DCTE staff, serve as a liaison between schools/districts and DCTE

Administration/Assistance

- **Annual Perkins local application:** prepare/plan/develop cooperative application, prepare/plan/develop Post-Approval Edits and changes in proposals, submit application
- **Budget Management:** Administer budget accounting practices, assist bookkeepers with alignment of CTE Insights balances to eFinance balances
- **GMS process with grants and State Start-up:** assist with review and communication as needed
- **Inventory:** Maintain Perkins (UGG 200.313) and State Start-Up inventory, inspect at least every two (2) years, assist in purchasing/distributing equipment/supplies, label equipment, prepare inventory lists for schools for Assurances and tiered support visits
 - *UGG 200.313 (4) (1) Property records must be maintained that include a description of the property, a serial number or other identification number, the source of funding for the property (including the FAIN), who holds title, the acquisition date, and cost of the property, percentage of Federal participation in the project costs for the Federal award under which the property was acquired, the location, use and condition of the property, and any ultimate disposition data including the date of disposal and sale price of the property.*
- **Represent cooperative at local, state, national events and activities to promote CTE education:** including CTSO initiatives and activities, such as serving as judges for competitive events
- **Respond to communication and calendar invites from state staff in a timely manner**
- **Complete 410,412,418 Career Readiness Training with DCTE**
- **Provide 410,412,418 Career Readiness training:** for teachers in cooperative service areas as needed.
- **Host a New Teacher Inservice annually:** for all new CTE teachers in your education cooperative service area with financial assistance and DCTE staff assistance.

INTRODUCTION

Background Information for Perkins V

The Perkins Manual contains guidance and procedures for sub-recipients receiving secondary Perkins funding.

The Carl D. Perkins Career and Technical Education Act of 2018, Strengthening CTE for the 21st Century Act was signed by President Donald Trump on July 31, 2018. This act is referred to as Perkins V. This is the fifth reauthorization of the legislation. The first Perkins Act was passed in 1984, the second in 1990, the third in 1998, and the fourth in 2008. The Act requires the state to designate a sole state agency to be responsible for the funds. In Arkansas, the Career Education and Workforce Development Board was the sole state agency (Act 892) until state governmental transformation in 2019. The Division of Career and Technical Education (DCTE) is now a division under the umbrella of the Arkansas Department of Education.

Find the Perkins Act here: <https://cte.ed.gov/legislation/perkins-v>.

Find the current Arkansas approved plan here: <https://dcte.ade.arkansas.gov/Page/PerkinsV>.

The Act became Public Law 115-224 and reauthorized the Carl D. Perkins Career and Technical Education Act of 2006. All provisions went into effect in the 2020-21 school year, which will serve as the full implementation year.

The contact for questions regarding this manual are:

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DCTE Staff Directory: <https://dcte.ade.arkansas.gov/Directory>

Web address of Division home page: <https://dcte.ade.arkansas.gov/>

CTE Insights/Perkins Portal

CTE Insights is currently the DCTE Perkins Portal used (as of June 2021) to submit and track project proposals.

All Perkins CTE Coordinators must be the designated “Z Coordinator” for their District/Consortium within APSCN to gain access to CTE Insights. DCTE manages user access and roles within CTE Insights.

The system administrator is the Perkins Program Coordinator, Dr. Lydia McDonald (Lydia.McDonald@ade.arkansas.gov).

Find CTE Insights here: <https://insight.ade.arkansas.gov/Account/Login?lea=AR>.



Arkansas DCTE

Perkins Important Dates

2022 - 2023

July 1	<ul style="list-style-type: none"> ● Perkins Fiscal Year begins <i>(Perkins Fiscal Year runs July 1– June 30)</i>
July 15	<ul style="list-style-type: none"> ● DCTE sends spreadsheet of Concentrator Graduates whose placement status was not provided through data-sharing with OIE, DWS, and OIT. Completed data sheets are due to DCTE by October 15.
August 1	<ul style="list-style-type: none"> ● DCTE opens portal for the following grant applications <ul style="list-style-type: none"> ○ State Start-Up ○ Non-Traditional ○ Innovation
August 8 & 9	<ul style="list-style-type: none"> ● DCTE re-opens 2021 - 2022 year in CTE Insights for final edits <ul style="list-style-type: none"> ○ Only 2021 - 2022 will be open these days ○ At 5pm August 9th, the 2022 - 2023 year will re-open <ul style="list-style-type: none"> ■ 2021 - 2022 year closes permanently
August 15	<ul style="list-style-type: none"> ● CTE Coordinators final day to expend Perkins obligated funds from 2021 – 2022/prior year
August 30	<ul style="list-style-type: none"> ● CTE Coordinators final day to verify certifications earned in prior year.
September 1	<ul style="list-style-type: none"> ● DCTE provides Course Pull to CTE Coordinators for review
September 1 - October 31	<ul style="list-style-type: none"> ● DCTE and CTE Coordinators complete Program Approvals
September 20	<ul style="list-style-type: none"> ● CTE Coordinators final day to submit applications for <ul style="list-style-type: none"> ● Innovation grants ● Non-Traditional grants
October 5 & 6	<ul style="list-style-type: none"> ● DCTE hosts Fall CTE Coordinators Meeting <i>Delta Hotel – Little Rock</i>
October 15	<ul style="list-style-type: none"> ● CTE Coordinators submit verified placement information for 2021 Concentrator Graduates spreadsheets to DCTE via secure file ● CTE Coordinator deadline to invoice: <ul style="list-style-type: none"> • Subscriptions • Software • Supplemental Curriculum <i>(used August – June of current year)</i>
November 1	<ul style="list-style-type: none"> ● CTE Coordinators final day to submit State Start-Up Applications

January 5	<ul style="list-style-type: none"> ● DCTE releases Approved State Start-Up Programs <ul style="list-style-type: none"> • DCTE publishes Commissioner’s memo • DCTE posts to State Grants Page
January 6	<ul style="list-style-type: none"> ● DCTE opens Off-Cycle State Start up applications portal <i>(closes May 31)</i>
January 31	<ul style="list-style-type: none"> ● CTE Coordinators submit State Start Up Mid-Year Reports <ul style="list-style-type: none"> • Mid-Year Budget Report • Inventory Sheet • Expenditure Audit Trail ● DCTE submits Consolidated Annual Report (CAR) to OCTAE
February 15	<ul style="list-style-type: none"> ● CTE Coordinator deadline to invoice pro-rated: <ul style="list-style-type: none"> • Subscriptions • Software • Supplemental Curriculum <i>(used only January – June of current academic year)</i>
March 14 & 15	<ul style="list-style-type: none"> ● DCTE hosts Spring CTE Coordinators Meeting ● DCTE provides Annual Report on Performance Measures for Concentrators ● DCTE provides Completer Certificate Template
May 1	<ul style="list-style-type: none"> ● CTE Coordinator - deadline to join or leave Consortia ● DCTE sends Intent to Fund letters via GMS <ul style="list-style-type: none"> • Coordinator salary grants at Education Cooperatives ● DCTE sends 2022 CTE Concentrator Graduates placement reports for verification
May 31	<ul style="list-style-type: none"> ● CTE Coordinator – last day to submit Off-Cycle State Start-Up applications
June 15	<ul style="list-style-type: none"> ● CTE Coordinators gain access to CTE Insights to submit upcoming year’s requests <ul style="list-style-type: none"> • Substantially approvable requests must be submitted prior to July 1: <ul style="list-style-type: none"> • <i>Administration Costs</i> • <i>Certifications</i> • <i>Professional Development (Travel)</i> • <i>Salaries</i> ● CTE Coordinators submit Comprehensive Local Needs Assessments to DCTE ● CTE Coordinators final day to submit Post Approval Cost edits for current fiscal year ● CTE Coordinators final day to obligate current year funds in CTE Insights

LOCAL GRANT ALLOCATIONS

Distribution of Funds

Of the total funds that come to the state from the Perkins V Act, 85% are distributed to local sub-recipients. The remaining 15% is used at the state level for administration (5%) and leadership (10%).

Of the 85% funds that are distributed to sub-recipients, Arkansas determines the split of the funds between secondary and postsecondary education. The split in Arkansas is currently 75% secondary and 25% postsecondary. As specified in the Act, postsecondary funds are distributed to institutions providing technical education of less than baccalaureate level with the distribution formula based upon Pell counts.

According to the Act, the secondary funds are to be distributed by the following formula:

- 70% on number of persons ages 5-17 that reside in each district from families with incomes below the poverty line.
- 30% on number of persons ages 5-17 that reside in each district or on the actual K-12 enrollment in districts as reported to the NCES (National Center for Educational Statistics). In Arkansas, enrollment data is used.

Availability of funds

The state receives two separate grant installments each fiscal year. The first is received on July 1 and is for 25% of the estimated total annual grant. The second installment is released on October 1 for the remaining 75%. Perkins funds are provided to eligible sub-recipients on a reimbursement basis.

Minimum grants

The Act states that sub-recipients that generate a grant of less than \$15,000 must join a consortium of other sub-recipients in order to operate programs and projects that are of sufficient size, scope, and quality to be effective (as defined on page 30, Arkansas Perkins V Plan that is found here: <https://dcte.ade.arkansas.gov/Page/PerkinsV>).

Funds that are assigned to a consortium are no longer tied to a specific district – the consortium is to operate programs and projects that are of effective size, scope, and quality for all of its members.

The fiscal agent for a consortium may be a school district or an educational cooperative.

The state is required to have a process for local recipients to request exemptions from the consortium requirement if their grant is less than \$15,000. The waiver process is described in (**Attachment A**).

Redistribution of Unspent Local Funds

In general – In any academic year that an eligible sub-recipient does not expend their entire allocation for such year under Perkins V section 131 or 132, such eligible sub-recipient shall return any unexpended amounts to the eligible agency (DCTE) to be reallocated under Perkins V section 131 or 132, as appropriate.

Redistribution of amounts returned late in an academic year – In any academic year in which amounts are returned to the eligible agency (DCTE) under Perkins V section 131 or 132 and the eligible agency is unable to reallocate such amounts according to such sections in time for such amounts to be expended in such academic year, the eligible agency shall retain such amounts for

distribution in combination with amounts provided under Perkins V section 112(a)(1) for the following academic year.

Reserve Funds

The Perkins Act allows the state to reserve up to 15% of the local grant allocation for Reserve funds. The state may award grants to eligible sub-recipients for projects in (1) rural areas, (2) areas with high percentages of career and technical education students, and (3) areas with high numbers of career and technical education students. These grants may be provided on a competitive basis or other basis determined by state priorities. The state's definition of areas with high percentages of career and technical education students is a district/consortium that has 50% or more of the grades 9-12 students enrolled in at least one CTE course.

CONSORTIA

Governance

A representative from each district that assigns funds to a consortium is the policy-making board for the consortium. A copy of the minimum requirements for a memorandum of understanding (MOU) and assignment form for consortium members is included as **(Attachment B)**. Signed MOU documents should be kept at the consortium; DCTE does not require copies of these documents.

Section 131(f)(2) of the Carl D. Perkins Career and Technical Education Act of 2018, Strengthening CTE for the 21st Century Act reads as follows:

Funds allocated to a consortium formed to meet the requirements of this paragraph shall be used only for purposes and programs that are mutually beneficial to all members of the consortium and can be used only for programs authorized under this title. Such funds may not be reallocated to individual members of the consortium for purposes or programs benefiting only one member of the consortium.

A Perkins consortium is the sub grantee of the state – not the member districts of the consortium. The consortium may not reallocate funds back to member districts. Once the district funds are assigned to the consortium, the funds lose their identity. Section 131(f)(1) of the Perkins Act states that the consortium must operate programs that are of sufficient size, scope, and quality to be effective (Perkins V Plan, page 30).

Operation

The consortium members (districts that assign funds to the consortium) are responsible for all policy decisions regarding the operation of the consortium. The executive director or other staff members of the consortium fiscal agent are not the policy makers -- the consortium member districts as a whole are responsible. This means that a board, comprised of a representative from each consortium member district, should make all policy decisions regarding the operation of the consortium. A yearly consortium board meeting shall be held to determine that all Perkins guidelines are followed in reference to legislative audit requirements with agenda, sign in sheets, and minutes forwarded to the Perkins Accountability Office. As a general observation, the educational cooperative board is NOT the same as the consortium board. Only the districts that assign funds to the consortium should have a representative on the consortium board.

One of the primary expressions of consortium policy should be the local plan. This document sets forth the consortium's overall plan of action and methods that will be used to implement the plan. That plan should be the basis for legal standing on activities undertaken by the consortium.

The state agency for Perkins (DCTE) has not published regulations relating to the specific operations of Perkins consortia – except guidance found in the sample memorandum of

understanding (**Attachment B**). Each consortium is free to make the policy decisions best suited to their own local situation and in the best interest of all the consortium members, within the confines of the Perkins V Act.

Relocation of Equipment

One particular question that has been asked is regarding the relocation or re-claiming of equipment that was purchased with consortium Perkins funds for a member district that will be consolidating with a district outside the consortium. OMB Administrative Requirements 200.313 states "... Title to equipment acquired under a Federal award will vest upon acquisition in the non-federal entity. This means that the consortium board has title to any equipment purchased with consortium funds. The consortium board must make the policy decisions regarding disposition of equipment purchased with its funds. This decision may include relocation of equipment upon consolidation -- or not."

The consortium retains a vested interest in the equipment for its useful life cycle (five years). However, the equipment may be assigned to and inventoried by the local school district. Although it is allowable for the consortium fiscal agent to inventory and manage the equipment, this may place an undue financial burden on the fiscal agent for the cost of ensuring large amounts of equipment not maintained at its own physical location. Therefore, most consortium fiscal agents transfer ownership of equipment to the local districts – while maintaining a vested interest for the consortium.

Consortia fiscal agents must have a system in place to monitor the use of equipment purchased with Perkins funds during its useful life cycle (for most this will be a spreadsheet/database outside of eFinance, which will reflect inventory submitted through the Perkins Portal).

A discussion between the District/Consortia CTE Coordinator and DCTE staff must occur prior to relocating equipment that was purchased for a CTE Program of Study that fails to thrive and is deleted.

Membership Changes

Because of the level of accountability required in Perkins V, the state has reserved the right to limit movement into or out of a consortium by individual districts. If an individual district chooses to leave or join a consortia, the following needs to be sent **to DCTE by May 1**:

1. The **district's** school board minutes showing approval for joining/discontinuing membership during the next fiscal year.
2. The **consortia** school board minutes showing approval for district joining/discontinuing membership during the next fiscal year.

COMPREHENSIVE LOCAL NEEDS ASSESSMENT AND LOCAL PLAN

[Comprehensive Local Needs Assessment \(CLNA\) Arkansas Template](#)

All Comprehensive Local Needs Assessments (CLNA) **must be completed every year**. A copy of the most current CLNA and Local Applications (including requests to fund salaries, travel, and professional development) must be submitted to DCTE, via an upload, no later than June 15th each year in order to be reviewed. Once reviewed and approved by DCTE, the recipient will be found to be "substantially approvable."

NOTE: Recipients should review any new assurances/certifications prior to submitting their application.

From Perkins V, Section 134 (Local Application for Career and Technical Education Programs):

“While conducting the local needs assessment and developing the local application, the local recipient must involve a diverse group of **stakeholders**, including at a minimum:

- Representatives of CTE programs in an LEA or educational service agency, including teachers, career guidance and academic counselors, principals and other school leaders, administrators, and specialized instructional support personnel and paraprofessionals
- Representatives of CTE programs at postsecondary educational institutions, including faculty and administrators
- Representatives of the state board or local workforce development boards and a range of local or regional businesses or industries
- Parents and students
- Representatives of special populations
- Representatives of regional or local agencies serving out-of-school youth, homeless children and youth, and at-risk youth (as defined in ESEA)
- Representatives of Indian Tribes and Tribal organizations in the state, where applicable...”

“...the local recipient should continue to consult with these stakeholders on an ongoing basis...”

LOCAL USES OF FUNDS

“Each eligible recipient that receives funds under this part shall use such funds to improve career and technical education programs.” – Excerpt from Perkins V

The meaning of the phrase “improve career and technical education programs” is not defined in the Federal language; however, it is clear that you may not use federal funds to maintain the status quo.

Even though a particular expenditure may be allowable by the Act and by federal regulation, the state retains the authority to disallow that expense if it is not consistent with the state’s plan for these funds.

Arkansas’ Allowed use of Perkins V funds in the Middle Grades

States are now able to use Perkins V funds to support the expansion of CTE and career exposure opportunities as early as the fifth grade. This expansion of funding eligibility to the middle grades has the potential to broaden and diversify the pipeline of prospective learners that enter secondary CTE programs.

There are no specific definitions of career exploration or career development activities, even though that term is used in the section of the law about local uses of funds. However, a list of possible (although not required or comprehensive) career exploration and career development activities is included. Arkansas encourages its CTE Coordinators to think creatively about ways to offer career exploration in the middle grades. A few potential ways to provide career exposure in the middle grades include:

- introductory courses or activities focused on career exploration and career awareness, including non-traditional fields;
- readily available career and labor market information, including information on:
 - occupational supply and demand;
 - educational requirements;
 - other information on careers aligned to State, local, or Tribal (as applicable) economic priorities; and
 - employment sectors;
- programs and activities related to the development of student graduation and career plans;
- career guidance and academic counselors that provide information on postsecondary education and career options;

- any other activity that advances knowledge of career opportunities and assists students in making informed decisions about future education and employment goals, including non-traditional fields; or
- providing students with strong experience in, and comprehensive understanding of, all aspects of an industry.

Requirements for Uses of Perkins Funds

Funds shall be used to support career and technical education programs that are of sufficient size, scope, and quality to be effective and that:

- (1) strengthen the academic and career and technical skills of students participating in career and technical education programs section 122(c)(1)(A), to ensure learning in:
 - (A) the core academic subjects (as defined in section 9101 of the Elementary and Secondary Education Act of 1965); and
 - (B) career and technical education subjects;
- (2) link career and technical education at the secondary level and career and technical education at the postsecondary level, section 122(c)(1)(A);
- (3) provide students with strong experience in and understanding of all aspects of an industry;
- (4) develop, improve, or expand the use of technology in career and technical education;
- (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 career and technical education programs;
- (6) develop and implement evaluations of the career and technical education programs carried out with funds under this title, including an assessment of how the needs of special populations are being met;
- (7) initiate, improve, expand, and modernize quality career and technical education programs;
- (8) provide services and activities that are of sufficient size, scope, and quality to be effective;
- (9) provide activities to prepare special populations, for high skill, high wage, or in-demand occupations that will lead to self-sufficiency.

Note: While Perkins funds are not required to be spent on every required activity, the recipient must assure that all required activities are being carried out. This is done in the recipient's Local Plan, which should be reviewed each year and updated as needed in the annual application.

Arkansas' definition of "**sufficient size, scope, and quality to be effective**":

We believe that size, scope, and quality (Perkins V Plan, page 30) are addressed through multiple factors including the following:

- The requirement in the Act regarding a minimum grant size to retain the funds.
- The Perkins application format itself, which requires addressing multiple facets of the improvement projects and expenditure of annual grants.
- The agency staff review guidelines as stated in this handbook.
- The accountability report for previous year's projects.
- The annual approval process of all CTE programs of study.
- The requirement in the Arkansas Standards for Accreditation for Public Schools that all CTE courses must be approved by the Division of Career and Technical Education in order to count for high school graduation credit and that each high school must offer the secondary portion of at least three CTE programs of study in three different career/occupational areas (DCTE approves the programs).

Size

- Class periods shall conform to the minimum class hours established by the Arkansas Department of Education Standards for Accreditation of Public Schools.
- Enrollments may vary and will depend on the availability of equipment, tools, furniture, and instructional materials that support the program.

- Program equipment requirements and safety conditions shall be a consideration in establishing class size.

Scope

- To comply with State Standard 1-A.1.3.9, schools must offer one Program of Study from three different Occupational Areas annually. Each Occupational Area defines the required entry level (core) course for each Program of Study. **Level 1 Core courses must be offered annually. Level 2 and Level 3 courses may 'rotate' and be offered every other year, if approved by DCTE.**
- Each CTE Occupational Program Area issues equipment lists annually. The equipment lists are considered the minimum equipment necessary for students to master the program area standards established by DCTE.
- The current version of equipment lists applies to new programs being implemented during the school year in which the equipment lists are issued.

Quality

- Approved programs of study are to follow all policies and procedures as well as program guidelines established and identified in the supplemental program operational guides and by approval of the Director of DCTE and/or their designee.
- Programs of study are expected to culminate in an industry-recognized technical skills certification (or an approved substitute), shall meet or show improvement in documented performance indicators, shall remove all critical elements identified through tiered support, and follow all required program guidelines. (A.C.A. section 6-5-1004)
- Approved programs will be reviewed annually to ensure quality.
- Comply with Office of Civil Rights Methods of Administration (MOA) procedures and regulations, and CTE Monitoring and Risk Assessment Reviews.
- Each approved program shall participate in a regional stakeholder meeting (to occur every other year) with diverse representation including industry applicable to the program area as outlined in Perkins V. Improvements to programs may occur based on information and recommendations made by stakeholders.
- Offer CTE programs that lead to one or more of the following:
 - a high-skill occupation - occupations that require an industry-credential of value, postsecondary training, apprenticeship, or degree.
 - a high-wage occupation - an average hourly rate equal to or greater than the average hourly rate of all similar occupations as reported by the Arkansas Department of Labor.
 - an in-demand occupation - an industry sector that has a substantial current or potential impact (including through jobs that lead to economic self-sufficiency and opportunities for advancement) on the state, regional, or local economy, as appropriate, and that contributes to the growth or stability of other supporting businesses, or the growth of other industry sectors.

PERMISSIVE AND NON-PERMISSIVE USES OF PERKINS FUNDS

Overview

As a sub-recipient of Perkins V funds from the state agency, each local sub recipient is required to follow OMB (Office of Management and Budget) regulations (2 CFR Chapter 1, Chapter II, Part 200, et al). The regulations contain a discussion of how to determine if an expense is allocable and reasonable, specific unallowable expense categories (although the state may set more stringent definitions if desired), and explanation of the documentation required if salaries are paid with federal funds. The website link to look at federal regulations is <https://www.ecfr.gov/cgi-bin/text->

The Perkins V Act contains a prohibition on expenditures for activities below the 5th grade.

The Act also has non-supplanting requirements described as follows: Federal grant funds must supplement and not **supplant** state or local funds (Perkins Act Section 311). Federal funds may not result in a decrease in state or local funding that would have been available to conduct the activity had federal funds not been received.

In the following instances, it is presumed that supplanting has occurred:

- **The LEA used federal funds to provide services that the LEA was required to make available under other federal, state, or local laws.**
- **The LEA used federal funds to provide services that the LEA provided with non-federal funds in the prior year.**
- **The LEA provides the same services to other students with non-federal funds.**

Because Perkins is a state-administered program, the state may elect to have requirements that are more stringent on the expenditure of funds than might be allowed by the Act or the federal regulations.

Method of Determining Allowable Costs

All Costs Must Be:

- Supported by the Comprehensive Local Needs Assessment (CLNA)
- Necessary
- Reasonable
- Allocable
- Legal under state and local law
- Adequately documented
- Be incurred during approved budget period
- Funds allocated to the consortium shall only be used for purposes that are mutually beneficial to all members of the consortium (*Perkins V Sec. 131 (f)(2)*)

Basic Cost Principles

In addition to the requirements in Local Uses of Funds outlined in Section 135(b) of Perkins V, all expenditures of Perkins funds must meet the basic cost principles outlined in the Office of Management and Budget (OMB) Circulars, the most current of which being 2 CFR 200 (the “Super circular”). The cost principles of 2 CFR Part 200 are the basic guidelines describing allowable ways federal funds may be spent. The expenditure of Perkins funding is further regulated by the Education Department General Administrative Regulations (EDGARs). The general principles 2 CFR Part 200 Subpart E – Cost Principles state that for costs to be allowable, they must be:

Reasonable and necessary (meaning that, for example, sound business practices were followed, and purchases were comparable to market prices);

- A cost may be reasonable if the nature of the goods or services acquired and the amount involved reflect the action that a prudent person would have taken under the circumstances prevailing at the time the decision to incur the cost was made.

Allocable to the federal award (meaning that the federal grant program, in this case Perkins, derived a benefit in proportion to the funds charged to the program – for example if fifty percent (50%) of an instructor’s salary is paid with Perkins funds, then that instructor must spend at least fifty percent (50%) of his or her time on a Perkins program);

Legal under state and local law;

Properly documented (and accounted for on a consistent basis with generally accepted accounting principles);

Consistent with the provisions of the grant program (The Strengthening Career and Technical Education for the 21st Century Act, Perkins V); and

Not used for cost sharing or matching with any other federal grant agreement. It is allowable to cost match Perkins V funds with school/local funds.

ANNUAL APPLICATION AND CHANGES

Application

The annual application for Perkins funds is available through the Arkansas Department of Education CTE Insights portal that is part of LEA Insights.

No funds should be obligated prior to July 1st. Additionally, the annual application and Comprehensive Local Needs Assessment in **substantially approvable** form must be submitted and approved.

The state's definition of "substantially approvable" is that the Perkins plan and application are complete and generally acceptable even though some projects/activities may need minor revision.

The annual application is a very important part of the overall state planning and monitoring for Perkins funds. All funds must be addressed in a project (this includes an overestimated buffer of cost due to shipping, taxes, etc.). In the event that a recipient desires to submit an application for less than their grant award, an exception can be granted by the Director for Career and Technical Education.

When developing the local application, please use the checklist below to ensure all items are addressed.

Local Application Checklist *(copied from ACTE's "Perkins V: The Official Guide", p. 147)*

- Describe the results of the Comprehensive Needs Assessment
- Provide information on the CTE course offerings and activities that will be provided with Perkins funds, which must include at least one state-approved program of study, including the following:
 - How the results of the comprehensive needs assessment informed the selection of the specific CTE programs and activities selected to be funded
 - A description of any new programs of study the local recipient will develop and submit to the state for approval
 - How students, including students who are members of special populations, will learn about their school's CTE course offerings and whether each course is part of a CTE program of study
- Describe how the following activities will be provided in collaboration with local workforce development boards and other local workforce agencies, WIOA one-stop delivery systems and other partners:
 - Career exploration and career development coursework, activities or services
 - Career information on employment opportunities that incorporate the most up-to-date information on high-skill, high-wage, or in-demand industry sectors or

- occupations as determined by the comprehensive needs assessment
 - An organized system of career guidance and academic counseling to students before enrolling and while participating in a CTE program.
- Describe how the academic and technical skills of students participating in CTE programs will be improved by strengthening the academic and CTE components of such programs through the integration of coherent and rigorous content aligned with challenging academic standards and relevant CTE programs to ensure learning in the subjects that constitute a well-rounded education (as defined by ESEA).
- Describe how the recipient will:
 - Provide activities to prepare special populations for high-skill, high-wage, or in-demand industry sectors or occupations that will lead to self-sufficiency
 - Prepare CTE participants for non-traditional fields
 - Provide equal access for special populations to CTE courses, programs and programs of study
 - Ensure that members of special populations will not be discriminated against on the basis of their status as members of special populations.
- Describe the work-based learning opportunities that will be provided to students participating in CTE programs and how the recipient will work with representatives from employers to develop or expand work-based learning opportunities, as applicable.
- Describe how students participating in CTE programs will be provided with the opportunity to gain postsecondary credit while still attending high school, such as through dual or concurrent enrollment programs or early college high school, as practicable.
- Describe coordination with the state and institutions of higher education to support the recruitment, preparation, retention and training, including professional development, of teachers, faculty, administrators, and specialized instructional support personnel and paraprofessionals who meet applicable state certifications and licensure requirements (including any requirements met through alternative routes to certification), including individuals from groups underrepresented in the teaching profession
- Describe the process for how disparities or gaps in student performance that will be identified in the local report will be addressed each year, and if no meaningful progress has been achieved prior to the third program year, what additional actions will be taken to eliminate those disparities or gaps.

Revisions to Application

Revisions (Post Approval Edits) to the Perkins application may be made throughout the year when unforeseen events occur. **The deadline for submitting the last Post Approval Edit is June 15 of each fiscal year.** New projects or substantially amended projects shall receive prior approval before implementation.

REVIEWING PERKINS PROJECTS

Questions for all recipient to consider prior to submitting projects:

Is the project **Rational, Reasonable, and Justifiable**?

- Does the project have:
 - Clear Title
 - Thorough Description, Justification, and Benefit
 - Correct number of Anticipated Impacts

- Correct indicator checked
- Correct school or consortium LEA number in the project cost
- Correct cost type number
 - (especially need to have items inventoried)
- Specific description (if necessary please look up)
 - Hyperlink to item or scanned page of specific item being ordered (model number, specifications for item)
- Correct item quantity number and correct total
 - If bundle do individual items need to be inventoried (listed in cost type)

Is the project type correct?

- Across All Programs
- Across All Programs Deficient
- Single Program Area
- Single Program Area Deficient

Other Items to Consider:

- Is it specific to a program or program of study?
- If equipment is purchased, how will each piece/item increase performance of students?
- Was this activity supported with state or school district funds during the previous school year?
 - If it has been previously supported, it may not be appropriate to fund with Perkins (supplanting).
 - If state or school district funds were NOT used the previous year, Perkins funds may be appropriate.
- Are cost types correct, especially those costs that will need to have items inventoried?
- Is this project “Above and Beyond” required standards?
- Is the communication between DCTE Staff and CTE Coordinators in the comments or if email is used, is the Perkins Program Coordinator included?

Perkins V Allowable and Unallowable Expenditures

Provided by Arkansas DCTE, Updated June 2022

Allowable Expenditures

- | | |
|---|--|
| <ul style="list-style-type: none">✓ Administration Costs – This should be your last reimbursement!
<i>Administrative/Indirect Costs should match your District/Co-Ops approved Indirect Cost rate – up to 5% of the award)</i>✓ Audit costs in accordance with the Single Audit Act
<i>(OMB Circular A 133)</i>✓ Bonding Costs✓ Career Guidance and Counseling✓ Communication costs (publications, postage)✓ Consumables used for CTE Instructional Purposes✓ Contracted Services✓ CTE Curriculum Development✓ CTSO Advisor costs (advisor extra duty pay/stipend, advisor travel, instructional materials/supplies.) <i>[CTSO Advisor travel IS Allowable IF submitted with the annual Substantially Approvable Budget request.]</i>✓ Displays, Demonstrations, and Exhibits of CTE Coursework/Projects✓ Equipment for approved CTE instruction✓ Excursions/extended learning opportunities tied directly to CTE coursework. <i>(General, exploratory college tours/visits are UNALLOWABLE indirect costs)</i>✓ Food and Drink <i>(Meetings and Conferences)</i>✓ Indirect costs – Indirect costs/Administrative costs (up to 5% of award)✓ Instructional Materials and Supplies✓ Instructor travel, meals, lodging, etc. for approved CTE travel identified in current year Perkins plan✓ Marketing and Outreach Activities (newspapers, radio/TV, magazines) | <ul style="list-style-type: none">✓ Memberships and Subscriptions in business, professional, technical groups/associations
<i>(Membership must be for the position/agency, not the person)</i>✓ Professional development to enhance CTE knowledge or skillset
<i>(must tie to the activities outlined in Section 135(b)(2)(A-I) of Perkins)</i>✓ Professional Service costs (Consultants)✓ Program Evaluation✓ Publication and Printing costs✓ Remedial services (curriculum modification, equipment modification, classroom modification, supportive personnel, instructional aids and devices)<ul style="list-style-type: none">● <i>Perkins dollars may NOT be used to fund remedial course (courses designed to provide instruction in reading, writing, and mathematics for students who have not acquired the basic academic skills necessary to succeed in general or in career and technical education courses.</i>✓ Rental equipment✓ Stipends for extra-duty CTE work✓ Substitute teachers (salary and benefits)
<i>(Time & Effort reporting still required for substitute teachers)</i>✓ Teacher in-service✓ Technical skill certifications (industry recognized certification exams)✓ Transportation costs (associated with excursions/extended learning opportunities tied directly to CTE coursework)✓ Meetings and Conferences – Must be properly documented and follow all basic cost principles. There is a significant burden of evidence required for purchases for meetings and conferences. When in doubt, ASK! |
|---|--|

This is not a complete list of the allowable and unallowable Perkins V. The allowability of any cost should be determined by considering the grant's purpose, Perkins V requirements, and any pertinent Federal cost-guidelines. All costs included in the Perkins budget **should support the comprehensive local needs assessment and DCTE approved CTE programs.**

Unallowable Expenditures

- | | |
|---|--|
| <ul style="list-style-type: none"> ✓ Advertising and Public Relations designed to solely promote the LEA (not tied directly and exclusively to CTE) (eCFR section200.421) ✓ Advisory Councils (eCFR section200.422) ✓ Alcoholic beverages (eCFR section200.423) ✓ Alumni/ae activities ✓ Bad debts (losses from uncollectible accounts) ✓ Child care for non CTE enrolled students ✓ Commencement and convocation costs ✓ Compensation for Instructors – Salaries, wages, fringe benefits ✓ Conference travel unrelated to career and technical education program improvement ✓ Constructions, renovation, and/or remodeling of facilities ✓ Consumable supplies to be made into products to be sold or to be used personally by students, teachers, or other persons ✓ Contingency or “petty cash” funds ✓ Contributions and donations ✓ Copyrights/patents ✓ CTSO student costs (items retained by advisor/students, social activities/assemblage) ✓ Dues/memberships to professional organizations or societies (for individuals) <i>Membership for the position/agency, are allowable</i> ✓ Entertainment ✓ Equipment and supplies for building maintenance ✓ Equipment or supplies not directly used to teach skills to students, including electronic student response systems ✓ Equipment solely for use by the administrator or other staff members ✓ Excessive installation costs for equipment purchased with Perkins funds ✓ Expenditures for CTE courses prior to grade 5 ✓ Expenditures that supplant ✓ Expenditures for non-approved CTE programs | <ul style="list-style-type: none"> ✓ Fines and penalties ✓ Fundraising ✓ Gifts ✓ Goods or services for personal use ✓ Insurance/Self-Insurance ✓ Interest and other financial costs ✓ Items retained by student (calculators, clothing/uniforms, PDAs, supplies, tools) ✓ Lobbying and other political activities ✓ Maintenance contracts or agreements unrelated to instructional equipment ✓ Monetary awards ✓ Non-instructional furniture (bookcases, drawers, file cabinets, etc.) ✓ Payments to students (stipend or ongoing) ✓ Pre-award costs ✓ Promotional materials (book bags, cups, key chains, pens, T-shirts) ✓ Purchase or lease of passenger vehicles including automobiles, trucks, buses, utility vehicles, airplanes, boats, and golf carts ✓ Purchase or construction of buildings/facilities, including permanent modifications to existing buildings/facilities) ✓ Remedial courses (courses designed to provide instruction in reading, writing, and mathematics for students who have not acquired the basic academic skills necessary to succeed in general or CTE courses) ✓ Scholarships paid directly to students ✓ Standard classroom furniture, files, and equipment not specific and unique to the instructional program (tables, chairs, desks) ✓ Student expenses/direct assistance to students (tuition, fees, insurance, and other expenses) ✓ Trailers |
|---|--|

Budget Information - Cost Types

Perkins Cost Type		APSCN Code	Inventory Item	Description
Personal Services-Salaries		61000	NO	Personal Services - Salaries. Amounts paid to both permanent and temporary school district employees, including personnel substituting for those in permanent positions. This includes gross salary for personnel services rendered while on the payroll of the school district. The fifth position in this group of objects has been left unused (i.e., 0) so that a job classification code can be inserted by the school district if desired.
		61110	NO	Certified Employees. Salary expenditures paid to employees in a certified position employees from the teacher salary fund or federal fund.
		61120	NO	Classified Employees. Salary expenditures paid to employees from the operating fund, building fund, federal fund or food service fund for work in a non-certified/classified position.
		61700	NO	Substitutes. Salary expenditures for work performed by substitute teachers.
Personal Services-Employee Benefits		62000	NO	Personnel Services - Employee Benefits. Amounts paid by the school district on behalf of employees (amounts not included in gross salary but in addition to that amount). Such payments are fringe benefit payments and, although not paid directly to employees, nevertheless are part of the cost of personnel services. The fifth position in this group of objects has been left unused (i.e., 0) so that a job classification code can be inserted by the school district if desired.
Purchased Professional and Technical Services	Professional Educational	63200	NO	Professional-Educational. Services supporting the instructional program and its administration. Included are curriculum improvement services, assessment, counseling and guidance services, library and media support, and contracted instructional services. (63200-63299: usually used with functions 1000-1999; 2100-2199; 2200-2299;2300-2399; 2400-2499)
	Consulting-Educational	63230	NO	Consulting - Educational. Consulting services provided in educational fields.

	Student Assessment (Certifications)	63240	NO	Student Assessment (Certifications)
	Professional Employee Training and Development	63300	NO	Professional Employee Training and Development Services (Usually used with functions 1000 and 2000). Services supporting the professional development of school district personnel, including instructional and administrative employees. Included are course registration fees (that are not tuition reimbursement), charges from external vendors to conduct training courses (at either school district facilities or off-site), and other expenditures associated with training or professional development by third-party vendors. All expenditures should be captured in this account regardless of the type or intent of the training courses of professional development.
Other Purchased Services	Student Transportation	65100	NO	Student Transportation Services. Contracted services for transporting children to and from school and other activities. (Used only with function 2720 - 2729)
	Travel	65800	NO	Travel. Expenditures for transportation, meals, hotel and other expenses associated with business travel for the district. Payments for per diem in lieu of reimbursements for subsistence (room and board) also are charged here. (Used with all functions except 5000)
Supplies and Materials	General Supplies and Materials	66100	NO	General Supplies and Materials. Expenditures for all supplies and materials (other than those listed in 66101 – 66150) for the operation of the district, including freight and cartage.
	Low Value Equipment Supplies <\$1,000	66107	YES	Low Value Equip Supplies (Less than \$1,000 Unit Cost). Expenditures totaling \$500.00- 999.99 for supplies and materials used in the operation of the district: for user who wants to keep this value range as “low value equipment” but per ADE guidelines it is expensed as supplies.
	General Supplies	66110	NO	Other general supplies

	Books and Periodicals	66400	NO	Books and Periodicals. Expenditures for books, textbooks and periodicals prescribed and available for general use, including reference books. This category includes the cost of workbooks, textbook binding or repairs, and textbooks that are purchased to be resold or rented. Also recorded here are the costs of binding or other repairs to school library books.
	Technology Supplies	66500	NO	Technology-related supplies include supplies that are typically used in conjunction with technology-related hardware or software. Some examples are CDs, flash or jump drives, parallel cables, and monitor stands. E-readers, including Kindles, and iPads, which fall below capitalization thresholds, should be reported here as well. Software costs below the capitalization threshold should be reported here. Licenses and fees for services such as subscriptions to research materials over the internet should be reported under 65300 Communications. (Used primarily with valid functions in range Instruction 1XXX, 2230, and 2580, but may also be used with 2620, 2650, and 2730).
	Software	66510	NO	Software, License or Maintenance Agreement. Includes all types of intangible technology-related software, programs, licenses, service contracts, and maintenance agreements not required to be capitalized. See 67350 for capitalization rules and determination.
	Technology APPS	66511	NO	Technology APPS. Digital applications (apps) typically loaded to tablets and smartphones.
	Technology-Related Device Supplies	66520	YES	Technology-related devices and equipment that are not specifically listed as a TED (66521) include printers, copiers, cameras, recording devices, and other devices with some level of complexity to operate. The cost is < \$1,000.00.
	Technology Educational Device (TED) supplies	66521	YES	A tablet or laptop or computer or any type of direct instruction delivery device (i.e. classroom projector or smartboard) that is used by a student or classroom teacher to support learning. The intent of the TED is to be utilized in a classroom (in-school or virtual) setting. The cost is < \$1,000.00. <i>(Added 3/12/2021, required FY '22)</i> Special Note on TEDs: A printer, copier, school office tablet/laptop/computer and any technology devices not used in the classroom do not qualify as a TED. These items are not considered to directly support student learning in an instructional capacity (i.e. a classroom printer's value to instruction is indirect because paper is still needed for learning). TEDs with a cost of less than \$1,000 are coded 66521 TEDs with a cost of \$1,000 or more are coded as a fixed asset to 67341

	Low Value Technology Equipment & Supplies <\$1,000	66527	YES	Low Value Equip Technology Supplies (Less than \$1,000 Unit Cost)
Property		67300	YES	Expenditures for the initial, additional and replacement of equipment such as machinery, furniture and fixtures, and vehicles.
Property/ Equipment	Machinery	67310	YES	Expenditures for equipment usually composed of a complex combination of parts (excluding vehicles). Examples are lathes, drill press, and printing presses. (Usually used with functions 1000 and 2600)
	Technology Related Hardware >= \$1,000	67340	YES	Expenditures for technology related equipment and technology infrastructure. These costs include those associated with the purchase of network equipment, servers, PCs, printers, other peripherals, and devices. Technology-related supplies (cost <\$1,000) should be coded to object code 66521, Technology Educational Device (TED) supplies. (Used with all functions, but primarily with 1XXX instructional range, 2230, and 2580). Technology-related devices and equipment that are not specifically listed as a TED (67341) or TLC (67343) include printers, copiers, cameras, recording devices, and other devices with some level of complexity to operate. The cost is >+\$1,000
	Technology Educational Device (TED)	67341	YES	Technology Educational Device (TED). A tablet or laptop or computer or any type of direct instruction delivery device (i.e. classroom projector or smartboard) that is used by a student or classroom teacher to support learning. The intent of the TED is to be utilized in a classroom (in-school or virtual) setting. The cost is >\$1,000. See "Special Note on TEDs" listed under object code 66521.
	Technology Software >=\$1,000	67350	YES	Expenditures for purchased software used for educational or administrative purposes that exceed the capitalization threshold. Expenditures for software that meet the standards for classification as a supply should be coded to object code 66500, Supplies – Technology Related. (Used with all functions, but primarily with 1000, 2230, and 2580).
Other Objects	Indirect Costs	68400	NO	Indirect Cost. Costs incurred that are not directly attributable to a specific school or for a specific activity or function. (Used with function 5500).

Reimbursement Information

All payments to recipients are done by reimbursement on a monthly basis and will be based on expenditures submitted in eFinance. DESE runs reimbursement reports on the 2nd Saturday of each month; CTE Coordinators can run their reports on the Monday after the 2nd Saturday to ensure they are reviewing the most current information,

- Any **recipient** that has not made program expenditures by the second Saturday in January of each fiscal year will be contacted along with your immediate supervisor and the program will be assessed to ensure timely implementation of approved projects and activities.
- The last day to submit **post approval edits is June 15**, after which the sub-recipient has 10 days to purchase items.

The last day to pay for obligated items following the fiscal year is August 31.
Any funds not legally obligated by June 15 and not paid out by August 31 will be lost by the sub-recipient.

Note: Reimbursement for expenditures between the second Saturday in June and the second Saturday in September will be processed in September.

After the Perkins Reimbursement Summary is completed and reviewed, a letter stating all funds not expended will be sent to the director/superintendent.

Reminder—Under Salary and Stipends—Anyone who is employed by the school district or consortia utilizing Perkins funds who receives a “stipend” or any payment added to paycheck will be required to submit a Personnel Activity Report (PAR). The PAR must document the percentage of the time worked on Perkins and on other activities and must total 100%. Copies of PAR forms used by the District will satisfy this requirement.

Documentation for Expenditures.

Below you will find the required documentation to be kept on file and submitted electronically to DCTE upon request. CTE Coordinators may find it helpful to also keep hard copy files (by year).

Semi-Annual Expenditure Reports

DCTE requires Semi-Annual Expenditure Reports. The first report is an Expenditure Audit Trail for the period July 1 through December 31 and is **due by January 31 via upload in CTE Insights**; the second Expenditure Audit Trail report covers January 1 through June 30 and is **due by September 30, also uploaded to CTE Insights**.

Project/Activity	Required Documentation	Important Notes
Professional Development	<p>Expenditure Audit Trail</p> <p>Travel Reimbursement Form (submit your District Travel Form)</p> <p>Flight Receipt</p> <p>Meal Receipt</p> <p>Hotel Receipt</p> <p>Incidental Receipts</p> <p>Registration Receipt</p> <p>Substitute Verification</p> <p>Prior-approval memo for any hotel stay over GSA rate (<i>remember hotels are the only expenditure that can go over the GSA rate</i>)</p> <p>Baggage Receipts (limit of 1 bag each way, with max reimbursable cost of \$30 each way)</p> <p>Ground Transportation receipt</p>	<p>Perkins V, Sec 3 (40)(A) and (B) defines ‘professional development’ as, “activities that are an integral part of eligible agency, eligible recipient, institution, or school strategies for providing educators (including teachers, principals, other school leaders, administrators, specialized instructional support personnel, career guidance and academic counselors, and paraprofessionals) with the knowledge and skills necessary to enable students to succeed in career and technical education, to meet challenging State academic standards under section 1111(b)(1) of the Elementary and Secondary Education Act, or to achieve academic skills at the postsecondary level; and are sustained (not stand-alone, 1-day, or short-term workshops), intensive, collaborative, job-embedded, data-driven, and classroom-focused, to the extent practicable evidence-based, and may include activities that...<i>(see the remainder of the section for continued definition)</i>.</p> <p><i>According to CFR section 200.474, travel costs are expenses for transportation, lodging, subsistence, and related items incurred by employees who are in travel status on official business of the non-federal entity. This means that you may not be reimbursed for anything regarding travel until it has taken place (Project completed).</i></p> <p><i>Remember meals <u>cannot</u> go over the GSA Per Diem Rates If splitting hotel stay, have documentation with receipt.</i></p> <p><i>Travel reimbursement form (district/consortia) to include all expenditures per recipient with all attached invoices/receipts.</i></p> <p><i>If for some reason registration or <u>airfare</u> is paid and the participant does not attend, you will not be able to be reimbursed for that expense.</i></p> <p><i>If lodging and meals are included with registration or PD event, they will not be reimbursed.</i></p> <p>https://www.gsa.gov/travel-resources</p>

Project/Activity	Required Documentation	Important Notes
Salaries & Benefits	<p>Expenditure Audit Trail</p> <p>Detailed Distribution Report by Employee Name</p> <p>Personnel Activity Report (PAR)</p> <p>Substitute (documentation if employed by district- -PAR)</p> <p>Substitute (documentation if employed by third party-Invoice)</p>	<p><i>Perkins funds may not be used for classroom teacher salaries required to implement and/or maintain CTE programs/classes described in an approved project in the annual application. If salary is paid from Perkins funds, then a Personal Activity Report (PAR) is required to document time and effort of the employee.</i></p> <p><i><u>Portion of salary from Perkins:</u> If only a portion of the employee's entire salary is paid with Perkins funds, then a monthly PAR is required. The PAR should document the percentage of time worked on Perkins activities and the percentage worked on all other activities. Total percentage of time worked must total 100% on the submitted monthly PAR</i></p>
Micro-purchases*** Software & Supplies & Equipment & Services \$0.00 - \$3,500.00	<p>Expenditure Audit Trail</p> <p>Invoice</p> <p>Use Tax payment to DFA if applicable</p> <p>Sales Tax Rebate (if applicable)</p>	<p><i>Section 200.67 Micro-purchases (Arkansas calls these "Small Order" services using simplified acquisition procedures, the aggregate amount of which does not exceed the micro-purchase threshold of \$3,500.00. Micro-purchases may be awarded without soliciting competitive quotations if the non-Federal entity considers the price to be reasonable.</i></p> <p><i>Micro-purchases are what the State calls 'small order'.</i></p>

Project/Activity	Required Documentation	Important Notes
Small-purchases*** Software & Supplies & Equipment & Services \$3,501.00 - \$10,000.00	Expenditure Audit Trail Invoice Quotations Use Tax payment to DFA if applicable Sales Tax rebate if applicable.	<p><i>Section 200.320 (b) If small purchase procedures are used, price or rate quotations must be obtained from an adequate number of qualified sources.</i></p> <p><i>The State requires that quotes:</i></p> <ul style="list-style-type: none"> ● Provide minimum specifications ● Lowest cost determines vendor selection ● Must obtain and document at least three (3) quotes (if three cannot be obtained, document contact(s) that did not provide quotes)
Equipment & Services > \$ 10,000.00* ** Competitive Bid	Expenditure Audit Trail Invoice Quotations Use Tax payment to DFA if applicable Sales Tax rebate if applicable.	<p><i>Section 200.317 When procuring property and services under a Federal award, a state must follow the same policies and procedures it uses for procurements from its non- Federal funds.</i></p> <p><i>The State requires that quotes:</i></p> <ul style="list-style-type: none"> ● Provide minimum specifications ● Lowest cost determines vendor selection <p>Must obtain and document at least three (3) quotes (if three cannot be obtained, document contact(s) that did not provide quotes)</p>
Administrative Cost	Expenditure Audit Trail Invoice stating breakdown of what is included in the 5%.(Indirect Cost Rate should be used)	<p><i>Reminder that your 5% administration costs is taken from the amount reimbursed for the grant, not the grant amount budgeted to the sub recipient (consortia/LEA).</i></p> <p><i>Administrative/Indirect costs must match the approved percentage for the District/Consortia – not to exceed 5%.</i></p>
***The more restrictive of federal and state rates are used		

Use/Excise Tax for Purchases

When requesting reimbursement for equipment and there is a deduction of amount of taxes paid due to the Use/Excise Tax laws, the appropriate tax forms should be submitted showing difference in tax amounts.

General Reimbursement Information

Disclaimer: The answer(s) provided is intended for this specific concern/question(s). This answer is not to be carried forward into another concern/question(s) or year. Based on possible changes to the Perkins rules and guidelines the answer(s) may be voided when applicable.

Sales & Use Tax on Purchases

When requesting reimbursement for supplies and equipment, documentation for the Use Tax is to be included with purchase documentation in the request for reimbursement. If the purchase is included in Perkins Inventory, the sales tax is included in the inventory cost.

The LEA is eligible for a sales tax rebate of local sales tax (county and city) on purchases that exceed \$2,500.00 on a single invoice. The amount of the rebate is the county tax rate plus the city tax rate multiplied by the amount of the purchase in excess of \$2,500.00. The amount of the invoice controls whether the rebate is available, rather than the cost of each supply or equipment purchased. To obtain the rebate, the LEA submits form ET-179A (Claim for Local Tax Rebate), to the Department of Finance and Administration.

The amount of the applicable sales tax rebate will reduce the eligible expense reimbursement for the related purchase regardless of whether the LEA actually claims the rebate. Include a copy of the rebate form or the calculation of the applicable rebate in your documentation.

PERKINS FINANCIAL RISK MANAGEMENT PLAN

1. Purpose

The Arkansas Department of Education: Division of Career and Technical Education receives and distributes funds for federal career and technical education programs that support Arkansas' education system and that require state administration. As a condition for receipt of these funds, the department must allocate these funds according to the requirements of each specific federal grant, review and approve applications for these funds from eligible recipients, and ensure compliance with federal regulations for uses of these funds.

The department's fiscal and program monitoring is part of this system of oversight. The first tier of oversight is to collect, review, and, if necessary, act on the findings of the required annual audits conducted on every district. Fiscal and program onsite monitoring is the second tier of oversight. Its purposes are:

- To monitor recipients' Perkins expenditures to ensure compliance.
- To identify and help resolve compliance problems surrounding recipient's current uses of funds in order to avoid audit findings and possible penalties after the end of the fiscal year.

The procedures described in this document are designed to test whether grant funds reimbursed by DCTE have been expended for the purpose identified in the grant award and whether those expenditures are allowable costs based on the cost principles for the type of organization receiving funds. It is the Department's intent to meet the federal monitoring requirements of OMB Circular A-133.

2. Monitoring Selection Process

Risk Factor Monitoring

Recipients will be organized into two groups:

- Consortium fiscal agents
- School Districts that maintain their own Perkins funds

Recipients will be selected for monitoring in any given year through the following steps.

#1 – Each year, all recipients in each group will be put in the monitoring pool.

#2 – Selection will be made by ranking recipients in the pool with risk factors that include the following:

- a) New recipient with little or no experience in managing the Perkins grant (recipients where persons in the coordinator role have changed will be viewed as new recipients) – 10 points
- b) Recipients whose audits or staff reviews have indicated to DCTE problems with costs, lack of controls or a system to identify costs charged to the grants or that may be on the ADE Fiscal or Academic Distress List – up to 10 points
- c) Recipients that receive over \$100,000 or consortia that receive over \$250,000 in Perkins funds – up to 5 points
- d) Recipients that failed to meet deadlines in submitting Perkins application, expenditure report, completers of programs, or placement of completers – up to 5 points
- e) Recipients that fail to have all funds substantially approved by January 1 in prior year – up to 5 points
- f) Recipients that fail to use a significant portion of their grant – up to 10 points
- g) Recipients that received multiple MOUs – up to 10 points (2 points per MOU)
- h) Recipients not monitored in past five years – up to 10 points
- i) Recipients who have had to return funds to DCTE based on their Annual Expenditure Report – 10 points
- j) Recipients that have reported a violation of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Federal award will receive up to 50 points. Note this is a Federal requirement to report such incidents affecting your Federal awards per **CFR §200.113 Mandatory disclosures**.

Those assessed the highest risk score in the pool will be monitored that year.

Special Monitoring

In addition to those recipients undergoing risk factor monitoring will be those chosen for special monitoring. Special monitoring will focus on recipients at which the division has reason to believe that Perkins funds are not being expended appropriately or who themselves are concerned about their compliance status and request a monitoring visit. Recipients may also be selected for special monitoring at the discretion of the Arkansas Department of Education: Division of Career and Technical Education.

3. Recipient Notification

A recipient selected for monitoring will be notified of its selection at least two weeks in advance of the on-site monitoring visit. The division will communicate directly with the recipient's superintendent or director to establish an agreeable date for an onsite monitoring visit. At the same time, the recipient will work with the assigned auditor to prepare for the visit and will be given a list of the types of documents required to be available for the review.

When monitoring in a consortium, the auditor will identify the specific schools/programs that may be visited so that the recipient can make arrangements with the school administration as appropriate prior to the date of the on-site monitoring visit.

4. Financial On-site Review Monitoring Procedures

The Monitoring Procedures focuses on three areas of compliance:

- Internal controls are in place to ensure that costs are assigned and tracked against federal grants using a method to ensure compliance with federal requirements, that assets acquired are safeguarded, and that they are used solely for authorized purposes
- Expenditures of federal funds are in compliance with federal cost principles (principles identifying what can be funded and how it can be funded)
- Expenditures are in compliance with the recipient's approved local plans.

Testing Method

In order to monitor current fiscal practices for compliance in these three areas, the auditor will use the following testing methods:

Internal Controls – An Internal Control Survey will be completed by appropriate school personnel to determine if proper controls are in place to manage the grant. Based on the assessment of the survey and a review of the most recently issued Financial Audit Report the auditor will determine what tests will be performed to determine the schools compliance with policies and procedures. The auditor will examine written policies and procedures for grant management, procure accounting records for each federal grant, check property/equipment inventories and maintenance schedules, and justify the most current request for reimbursement with grant balances an expenditures. “[Charges] must be based on records that accurately reflect the work performed, must be supported by system of internal controls, and meet the other general requirements in 2CFR 200.430(i).”

Internal Control documentation needed for the Financial Monitoring Review

From Uniform Guidance 2 C.F.R. Part 200

Written Cash Management Procedures (section 200.302

(b)(6)) Written Allowability Procedures (§200.302 (b)(7))

Written Procedures on Internal Controls (§200.303)

Written Procedures on Property and Managing Equipment (§200.313)

Written Procurement Procedures (§200.318)

Written Standards of Conduct including Conflict of Interest Policy (§200.318)

Written Travel Procedures (§200.474)

From Perkins V law

Mutually Beneficial to all members of the Consortium (Section 131) (f)(2)

“Funds allocated to a consortium formed to meet the requirements of this subsection shall be used only for purposes and programs that are mutually beneficial to all members of the consortium and can be used only for programs authorized under this title. Such funds may not be reallocated to individual members of the consortium for purposes or programs benefitting only 1 member of the consortium.”

Compliance with cost principles and local plans will be tested by examining outlays for the past fiscal year and the current fiscal year as needed. Source documentation (purchase orders, invoices, cancelled checks, payrolls, time and attendance records, etc.) for randomly selected transactions will be reviewed to determine the nature of the expenditure and to establish its allowability. Specific outlays will also be reviewed to establish their consistency with the approved local plan. The auditor will examine outlays under each of the approved budget categories.

In examining the outlays, the auditor will look at such issues as:

- Is the expenditure a normal expenditure that should have been covered by non-grant funds?
- Does the contract indicate its purpose or the person hired is within the purpose of the grant?
- Does the work schedule for the individual indicate the time spent working on the cost objectives of the grant and on other cost objectives? Is it reported after-the-fact and signed by the individual?
- Are the costs allowable based on cost principles per *The Administrator's Handbook on EDGAR 5th edition*?
- Are the expenditures applicable to the period covered by the grant?
- Do expenditures requested for reimbursement agree with expenditures in the recipient's ledger for the same period?
- Was equipment purchased on the new program start up list (also known as start-up equipment list) in effect at the time when the program started?
- Are expenditures recorded in the correct account code in APSCN and identified as Perkins expenses?
- Were the expenditures reimbursed by more than one grant or program?

Exit Interview

When the on-site/virtual monitoring has been completed, the auditor may conduct an oral exit interview with the superintendent/director and anyone else he/she deems appropriate.

The auditor will identify areas of possible non-compliance and provide the opportunity for the submittal of further information or explanation to correct misperceptions or misinterpretations.

5. Final Report & Corrective Actions

Final Report

The Division of Career and Technical Education will issue a written final report of the findings of an on-site monitoring visit within 45 days after the completion of the visit. Program staff may be consulted during that period to clarify an issue or verify the accuracy of information collected during the review. Findings of current non-compliance could be in one of three categories:

- a) Adequate internal controls are not in place
- b) Sufficient source documentation is not in place to justify an outlay
- c) Specific outlays are not allowable under cost principles or do not meet the purpose of the grant.

Corrective Action Plan

Once the recipient has received the Final Report of the On-Site Monitoring Visit, it has fifteen (15) days to submit a corrective action plan for findings of non-compliance. In its response, it can challenge the findings by submitting material that demonstrates the inaccuracy of the finding. When it concurs that a finding of non-compliance is correct, it needs to file a corrective action plan.

The recipient may work with its visit liaison to obtain help from the division in formulating adequate corrective actions. A corrective action must be created for each finding and should result in bringing the recipient into full compliance. The nature of the corrective action will relate back to the category of the finding. When there are weaknesses in internal controls, policies and/or procedures must be developed and implemented and accounting records must be brought into compliance with approved budgets.

- a) When sufficient source documentation is not in place, such documentation will be put into place or the outlay will be determined to be disallowable.
- b) When specific outlays are determined to be disallowable under costs principles or the purposes of the grant, the recipient must submit documents indicating those costs have been transferred and paid using non-grant funds.

Corrective actions should identify:

- The action to be taken to bring each cited item into compliance and to keep the problem from recurring.
- Who will be responsible for the action?
- When will the corrective action(s) be completed?

When the division is satisfied that the proposed corrective actions will be successful in resolving all problems, the recipient will be notified that it has an approved corrective action plan. Corrective actions must be completed before the current fiscal year is closed out. After the date on which corrective actions were to be completed, the auditor may schedule a follow-up visit to verify that the actions have been carried out and that they were successful in resolving problems or will arrange for an alternate way for the recipient to demonstrate that effective corrective actions have been completed.

Possible Penalties

The imposition of penalties for non-compliance with federal requirements will be a last resort. The main objective of the monitoring system is to assist recipients in creating sound grant management systems. However, federal law requires that the division take action if its recipients do not comply with federal requirements.

1. Failure to resolve issues, to refund disallowed costs, or to supply adequate documentation to support costs charged to grants will result in a warning that funds may be suspended until the requirement is met.
2. Continued failure to resolve issues, to refund disallowed costs, or to supply adequate documentation will result in a possible permanent suspension of funds.

6. Who to Contact

Conducting on-site monitoring visits is only one method of addressing the state's responsibility for oversight of the Perkins funds. The Division of Career and Technical Education is also committed to providing the training and technical assistance that its recipients request to improve their grants management systems. For more information on this monitoring system or to request assistance, please call Jan Cook at 501/682-1729.

PERKINS INVENTORY

Perkins equipment more than \$500 and technology considered "walkables", (*these are items are not likely to be missed. See below for examples of walkables*)

- Mark item(s) to identify them as "Carl Perkins"
- Mark item(s) with the "year" purchased
- District inventory tag
- Occupational area and year purchased

Recent federal audits have included findings regarding small portable attractive items, particularly technological items. A small attractive portable item is an item that is priced under the \$1,000 equipment criteria (or even under \$100) and has a life expectancy of more than five years.

Examples of 'walkables' include, but are not limited to, tablets, laptops, cameras, shop tools, flash drives, etc. A recipient's internal controls must be sufficient to account for all such purchases made with federal funds. **This is why DCTE requires items costing more than \$500 and "walkables" be maintained in inventory.**

DCTE retains a vested interest in the equipment purchased with Perkins funds for its useful life cycle (currently five years). If the program/project for which it was purchased is discontinued or if the equipment is no longer needed in the program, request may be made through the Perkins Program Coordinator to reassign the equipment as outlined in OMB Administrative Requirement 200.313.

Equipment must be used in the program or project for which it was acquired as long as needed. When no longer needed for the original program or project, the equipment may be used in other activities in the following priorities: (1) other activities supported by Perkins and (2) other activities supported by federal education funds. When no longer needed by the recipient in any program, request may be made to sell or use the equipment for a trade-in with the proceeds offsetting the replacement cost.

If equipment is stolen, destroyed, or otherwise missing, the district/consortium is responsible for investigation (police report) **and replacement**. If the district purchased an insurance policy with a large deductible, they assumed the risk and responsibility for covering any losses up to that amount – with local funds. Therefore, the district must replace the stolen equipment for the program/activity – but not with Perkins funds.

When a consortium fiscal agent transfers ownership of items to the member districts, the member districts should be made aware of this responsibility.

Subgrantees must maintain a separate inventory of equipment purchased with Perkins funds during its useful life **cycle (for most this will be a spreadsheet/database outside of eFinance which will reflect inventory submitted through the Perkins Portal)**.

Edgar 200.313 (d) (1)

ACCOUNTABILITY PERFORMANCE MEASURES

Definitions

Concentrator - A Concentrator is a student who has completed one foundational CTE credit and one additional CTE credit within the same approved CTE program of study. Any two levels must sum to two credits within a program of study. Concentrators must have 1.0 credit in Level 1. Level 1 includes the foundational courses. Levels progress in specificity as required.

(Concentrators are determined at the state level through APSCN (Arkansas Public School Computer Network) course enrollment records cross-referenced to business rules defining course combinations that define concentrators according to Appendix M, page 130 of the Perkins V State Plan.

Completer - A Completer is a concentrator who has successfully completed a **minimum of three units of credit** including all of the core requirements of a career and technical program of study through the secondary level and has graduated from high school. Districts determine their Completers annually. Completer lists are *only* needed for the local district and are **NOT submitted** to DCTE.

A completer must be a graduate. Check to see if the graduate has completed three units of credit (not just three classes) in grades 9-12. One unit of credit equals one class period all year long on a regular (not block) schedule. Check to see if those three units include all of the core requirements for the program of study. The programs of study can be found in the CTE Occupational Areas on the agency's website at www.dcte.ade.arkansas.gov

Completer Certificates

DCTE is required by state statute to make available certificates of program completion for students if requested by the school district. The template is sent electronically to the CTE Coordinator of the consortium or district.

Performance Measure Definitions

1S1: 4-Year Graduation Rate	
Numerator	Denominator
The number of CTE concentrators who were members of the four-year adjusted cohort and earned a regular high school diploma within four years pursuant to the four-year adjusted cohort graduation rate	Number of CTE concentrators who were included in the four-year adjusted cohort as expected to graduate pursuant to the four-year adjusted cohort graduation rate

1S2: Extended Graduation Rate	
Numerator	Denominator
The number of CTE concentrators who were members of the five-year adjusted cohort and earned a regular high school diploma within five years pursuant to the extended-year adjusted cohort graduation rate.	Number of CTE concentrators who were included in the five-year adjusted cohort as expected to graduate pursuant to the five-year adjusted cohort graduation rate

2S1: Academic Performance in Reading/Language Arts	
Numerator	Denominator
CTE concentrator performance in the challenging State academic standards adopted by the State under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as measured by the academic assessments in reading/language arts as described in section 1111(b)(2) of such Act. Academic Proficiency Score for ELA = LA Weighted Achievement Score x (0.50) + ELA School Mean Value Added Growth Score x (0.50)	Number of CTE concentrators who took the ESEA assessments in reading / language arts whose scores were included in the program year in the State's computation of the annual measure for reading / language arts. The de-nominator for this measure is a non-duplicate count of CTE concentrators where each student is counted only once in the denominator even if the student has completed more than one concentration.

2S2: Academic Performance in Mathematics	
Numerator	Denominator
CTE concentrator performance in the challenging State academic standards adopted by the State under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as measured by the academic assessments in mathematics as described in section 1111(b)(2) of such Act. Academic Proficiency Score for Math = Math Weighted Achievement Score x (0.50) + Math School Mean Value Added Growth Score x (0.50)	Number of CTE concentrators who took the ESEA assessments in mathematics whose scores were included in the program year in the State's computation of the annual measure for mathematics.

2S3: Academic Performance in Science	
Numerator	Denominator

<p>Numerator: CTE concentrator performance in the challenging State academic standards adopted by the State under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as measured by the academic assessments in science as described in section 1111(b)(2) of such Act. Academic Proficiency Score for Science = Science Weighted Achievement Score x (0.50) + Science School Mean Value Added Growth Score x (0.50)</p>	<p>Denominator: Number of CTE concentrators who took the ESEA assessments in science whose scores were included in the program year in the State's computation of the annual measure for science.</p>
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3S1: Postsecondary Placement

Numerator	Denominator
<p>Number of CTE Concentrators who, in the second quarter after exiting from secondary education, are in postsecondary education or advanced training, military service or a service program that receives assistance under Title I of the National and Community Service Act of 1990 (42 U.S.C. 12511 et seq.), are volunteers as described in Section 5(a) of the Peace Corps Act (22 U.S.C. 2504(a)), or are employed.</p>	<p>Number of CTE Concentrators who left secondary education during the reporting year.</p>

4S1: Non Traditional Program Enrollment

Numerator	Denominator
<p>Number of CTE concentrators from underrepresented gender groups who became CTE concentrator in a program of study leading to a non-traditional career field.</p>	<p>Number of CTE concentrators who became a CTE concentrator in a CTE program of study leading to a non-traditional field.</p>

5S1: Program Quality – Attained Recognized Postsecondary Credential

Numerator	Denominator
<p>Number of CTE concentrators graduating from high school having attained a recognized postsecondary credential</p>	<p>Number of CTE concentrators who graduated from high school</p>

Placement status Definitions

Adjusted Cohort Graduation rate – a non-duplicate count of CTE Concentrators where each student is counted only once in the denominator even if the student has completed more than one concentration.

Employed in field of program completed – Concentrators are considered employed in the field of program completed if they work for pay on a part-time or full-time basis in a job related to their program of study.

Employed not in the field of program completed – Concentrators are considered employed in this category if they work for pay in any job on a part-time or full-time basis.

Further Education – Concentrators are considered enrolled in further education or training if they are enrolled in a postsecondary institution or advanced training program.

Military – Military service may include any branch of the armed forces.

Not Found – Concentrators who cannot be located despite all reasonable attempts or who are incarcerated or deceased should be marked as Not Found.

Unemployed – Concentrators who are not enrolled in further education and not employed should be reported as unemployed.

Time period and Methods for Placement Determination and Data Collection

Beginning in the spring of 2021, DCTE has worked with the Office of Innovation for Education (OIE) and the Department of Information Systems (DIS) via a Data Sharing Agreement to collect Placement Information for CTE Concentrators. A spreadsheet of CTE Concentrators whose placement information is NOT found through the data sharing agreement will be sent to CTE Coordinators by July 15th each year for follow up regarding placement status.

Placement in multiple statuses

Concentrators achieving multiple placement outcomes should be reported as follows:

Enrolled in further education and employed – report as enrolled in further education

Enrolled in further education and in the military – report as enrolled in further education

Nontraditional Information

Nontraditional Programs – A program of study is classified as nontraditional if it prepares students for further education/training or for employment in a career field in which either gender is represented at 25% or less. Please note that it is the actual workplace statistics which determines the nontraditional status, and not the enrollment balance in the class.

Nontraditional Pathways

Link to list of current [Non-Traditional Pathways](#)

Industry Recognized Certifications

Perkins sub-recipients must report any industry-recognized certifications/credentials that their CTE students obtain. These include, but are not limited to, Microsoft MOS, ServSafe, NCCER, NATEF, Adobe, Autodesk, CAN, etc. The List of approved industry-recognized certifications can be found at [2022 AR DCTE Recognized Industry Certifications](#)

Beginning in October 2022, CTE teachers will enter student certification achievement information **when the certification is earned**. Seamless is the portal teachers will use to enter and track certifications.

Attachment D - outlines the Division's policy on reimbursing students for costs of industry certifications.

MONITORING IMPROVEMENT PLANS AND SUBSEQUENT ACTIONS

Performance Indicator Monitoring

Any recipient that fails to meet at least 90% of any performance target must file an improvement plan during the following year. The improvement plan will be a part of the annual local application. Resource documents from the National Alliance for Partnerships in Equity (NAPE) are included with the Perkins Manual for improvement plan considerations. The Division may request progress reports periodically to determine if the improvement plan has been implemented and is effective.

Below is the description of how the state intends to use improvement plans for improving and evaluating the effectiveness of the use of Perkins funds.

After a recipient is identified as failing to meet an adjusted level of performance, the recipient must file an improvement plan that addresses each indicator in which 90 percent of the target was not achieved. The Act requires that the state monitor and provide technical assistance regarding performance. Further, the state may redirect all or a portion of a local recipient's funds to provide services to students through alternative arrangements if the recipient fails to implement an improvement plan or fails for three consecutive years on the same indicator.

First year of improvement plan: *Any school district/consortia that has been identified with an Improvement Plan in one or more of the performance measure areas will be monitored beginning at Tier 1 of DCTE Tiered Support as detailed in DCTE Policies and Procedures.* Tier 1 Support initiates technical assistance with the local district to assist in guidance and information based on the specific performance measure(s). State staff will determine if this plan has been developed and provide technical assistance. If the consortia/district does not develop a first year Improvement Plan or does not meet the 90% threshold for the same indicator for a second year, the consortia/district will be required to follow the second year improvement plan.

Second year of improvement plan: The school district/consortia will enter Tier 2 support as detailed in DCTE Policies and Procedures. For each performance measure, a detailed plan shall be submitted in the local application in collaboration with DCTE followed by ongoing technical assistance to address how the consortia/district will improve that performance measure(s).

Third year of improvement plan: The school district/consortia will enter Tier 3 support as detailed in DCTE Policies and Procedures. DCTE staff shall complete an on-site support visit to establish projects approved by DCTE for submission to address each performance measure not met. A detailed plan addressing the performance measures that are below the 90% level will be included in the district/consortia local application. The plan shall provide details regarding how the district/consortia will improve the performance measure(s).

Subsequent Action: If the recipient has implemented its improvement plan and still fails to meet 90 percent of the adjusted performance level for the same performance measure(s) after the third year, the State Board may redirect a portion, or all of the recipient's funds and provide services to the recipient's CTE students and programs through alternative arrangements. These alternative providers may include a postsecondary institution, a secondary center, school district, an educational cooperative, a state agency, or another alternative provider with expertise in the area in which there are continuing struggles.

USEFUL LINKS FOR COORDINATORS

Division of Career and Technical Education (<https://dcte.ade.arkansas.gov/>)

This is one of the most important websites for Coordinators. Please bookmark this site on your favorites list for ease of access.

Arkansas Division of Elementary and Secondary Education (<https://dese.ade.arkansas.gov/>).

Arkansas CTE Coordinator Shared Google Drive: CTE Coordinators can request access from Dr. Lydia McDonald, Program Coordinator for Perkins Accountability and Finance.

Arkansas Department of Education Data Center (<https://adedata.arkansas.gov/>).

Arkansas Association of Career and Technical Educators (<http://www.acteonline.org/arkansas>)

Many career and technical teachers/administrators are members of the ACTE. There is an annual state conference prior to the beginning of school each year. The Division works closely with ACTE to bring relevant and appropriate in-service to the conference.

Career Clusters (<https://careertech.org/career-clusters>)

This is the state's national website for information on career clusters. Arkansas participates with all other states in this effort.

EDGAR – Education Department General Administrative Rules_(<http://www.ecfr.gov>).

The Association for Career and Technical Education (<http://www.acteonline.org>) This is the national organization affiliated with ACTE.

Uniform Grant Guidance

(http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl).

ATTACHMENTS

Attachment A

WAIVER OF \$15,000 MINIMUM GRANT

WAIVER PROCESS FOR \$15,000 MINIMUM ALLOCATION ON PERKINS

The Carl D. Perkins Career and Technical Education Act of 2018, Strengthening CTE for the 21st Century, the Century Act, has the following provision regarding waivers of the \$15,000 minimum secondary allocation:

Section 131(c) MINIMUM ALLOCATION. –

(1) IN GENERAL – Except as provided in paragraph (2), a local educational agency shall not receive an allocation under subsection (a) unless the amount allocated to such agency under subsection (a) is greater than \$15,000. A local educational agency may enter into a consortium with other local educational agencies for purposes of meeting the minimum allocation requirement of this paragraph.

(2) WAIVER. – The eligible agency shall waive the application of paragraph (1) in any case in which the local educational agency –

- (A) (i) is located in a rural, sparsely populated area, or
- (ii) is a public charter school operating secondary vocational and technical education programs, and
- (iii) demonstrates that the local educational agency is unable to enter into a consortium for purposes of providing activities under this part.

Waiver Format: The LEA must submit a written waiver request to Ross White, Director for CTE, which fully addresses both (A) and (B) of subsection (2) above. Documentation must be presented. In particular, the LEA must document why it is unable to join a consortium to meet the \$15,000 minimum.

LEA Submission Timeline: The Division will accept a waiver request at any time prior to May 15 for the upcoming fiscal year. Waiver requests will not be considered after May 15 for the upcoming fiscal year. *(Example, a waiver request received on May 20, 2021, will not be considered for the 2021-2022 fiscal year. However, it could be considered for the 2022-2023 fiscal year.)*

Division Response Timeline: The Division's Senior Management Team will respond to a waiver request within 10 working days of receipt of the request. If a waiver is approved, the LEA may then submit a plan and application for Perkins funds. However, until the plan and application is submitted, no Perkins funds may be obligated by the LEA for any purpose. If disapproved, the LEA must enter into a consortium with other local education agencies in order to participate in Perkins-funded activities. Or the LEA may decline to accept Perkins funds.

Address for Waiver Requests: Ross White, Director
Division of Career and Technical Education
Arkansas Department of Education
Three Capitol Mall
Little Rock, AR 72201
(fax 501.682.1509)

MEMORANDUM OF UNDERSTANDING – ASSIGNMENT OF FUNDS

**2022 - 2023 Assignment of Funds and Memorandum of Understanding Detailing the Operation of the
_____ Perkins Secondary Consortium**

District:

Amount of Funds:

Governing Board: All decisions not otherwise prescribed in this document regarding the uses of funds, either consortium-wide or on individual members' campuses, and/or the operations of the consortium, as a whole will be made by consensus of a Governing Board representing each member district. The Governing Board shall convene as often as necessary and by means of its choosing to conduct Consortium business.

Consortium Funding: The total of the amount of Perkins funds for which all member districts qualified shall comprise the Consortiums allocation. All funds shall reside with the fiscal agent; the fiscal agent shall make no grant allocation to member districts other than might be required to cover the costs of specific activities or services being or to be conducted on that members campus. Member districts shall not retain nor administer an on-going Perkins account.

Consortium Fiscal Agent: The fiscal agent for the Perkins Consortium shall be the _____. It shall be the fiscal agent's responsibility to handle and account for all Consortium funds, and pay all bills for costs of activities or services provided by the Consortium on members' campuses. In addition, the fiscal agent will be responsible for preparing and submitting the Consortium's annual grant application and the local plan, and for submitting to the Division of Career Education all required forms and reports in the name of the Consortium. The fiscal agent may invoice the Consortium for up to 5% of these funds to cover the costs entailed in the administration of the Consortium.

Member Services: In accordance with Section 131(f)(2) of the Act, all member districts shall receive services from Consortium in accordance with demonstrated need. Services shall be provided on a consortium- wide basis. The specific activities funded by the Consortium on member campuses, however, may vary as needs on individual campuses indicate, provided these activities have merit toward improvement of the member institutions performance on the core indicators. The fiscal agent may invoice the Consortium for the staff services necessary to implement the approved projects in the Consortium's annual application. The c o s t of the services shall be fully described in the annual application. Members will be provided with a copy of the application as desired.

Responsibilities of Member Districts: Member districts shall be responsible for providing the fiscal agent with the information the fiscal agent shall require in order to fulfill the responsibilities outlined in the section above, and for conducting all Consortium-funded activities or services in accordance with the requirements of the Carl D. Perkins Act.

Legal Oversight Responsibilities: The responsibilities of legal oversight of activities on all member campuses funded by or conducted under the provisions of the Carl D. Perkins Act and this Assignment of Funds/Memorandum of Understanding, and the use of and accounting for Perkins funds by the fiscal agent shall remain the purview of the Arkansas Department of Education: Division of Career and Technical Education.

Assignment of Funds: I do hereby assign the Perkins funds for this school district to the _____ Perkins Consortium.

Superintendent Signature: _____ Date: _____

Fiscal Agent Signature: _____ Date: _____

STATEMENT OF ASSURANCES (Local Plan)

Assurances form a binding agreement between the eligible recipient fiscal agent, the Arkansas Department of Education, and the U.S. Department of Education that assures all legal requirements are met in accordance with state and federal laws, regulations, and rules.

These assurances apply to program activities and expenditures of funds. Compliance to general and specific program assurances is the legal responsibility of the eligible recipient under the authorization of the local board of education.

Programs, services, and activities included under this application shall be operated in accordance with the Carl D. Perkins Career and Technical Education Act of 2018, Strengthening CTE for the 21st Century Act.

THE APPLICANT CERTIFIES COMPLIANCE WITH:

- Title VI and VII of the Civil Rights Act of 1964;
- Title IX of the Education Amendments of 1972;
- Section 503 and 504 of the Rehabilitation Act of 1973;
- Executive Order 11246 prohibiting employment discrimination based on race, color, sex, religion, and national origin;
- The Age Discrimination Act of 1975 and the Age Discrimination in Employment Act of 1967;
- The Equal Pay Act of 1963;
- The Americans with Disabilities Act of 1990;
- ORS 326.051 and ORS 659.105, education standards and all rules issued by the State Board of Education pursuant to these laws; and,
- All health and safety laws and regulations issued by the U.S. Department of Education pursuant to their laws, when classroom facilities will be used by students and/or faculty.

THE APPLICANT AGREES AND ASSURES THAT:

1. The applicant will comply with the requirements of the Act and the provisions of the State Plan, including the provision of a financial audit of funds received under the Act which may be included as part of an audit of other Federal or State programs. [section122(13)(A)]
2. Funds made available under this Act for career and technical education shall supplement, and shall not supplant, non-Federal funds expended to carry out career and technical education activities. [section 211(a)]
3. None of the funds expended under this Act will be used to acquire equipment (including computer software), in any instance in which such acquisition results in a direct financial benefit to any organization representing the interests of the acquiring entity or the employees of the acquiring entity, or any affiliate of such an organization. [section122(13)(B)]
4. The eligible agency will use the funds to promote preparation for high-skill, high-wage, or in-demand industry sectors or occupations and non-traditional fields, as identified by the eligible agency. [section122(13)(C)]
5. Any eligible recipient desiring financial assistance under this part shall, in accordance with requirements established by the eligible agency (in consultation with such other educational training entities as the eligible agency determined to be appropriate) submit a local application to the eligible agency. Such local application shall cover the same period of time as the period of time applicable to the State plan submitted under section 122 [section134(a)].

6. Guidance for creating the Comprehensive Local Needs Assessment can be found on the Arkansas Division of Career and Technical Education's website:
<https://dcte.ade.arkansas.gov/Page/PerkinsV>.

PROGRAM ASSURANCES

1. Each eligible recipient that receives funds under the Carl D. Perkins Career and Technical Education Act of 2018, Strengthening CTE for the 21st Century Act shall use such funds to develop, coordinate, implement, or improve career and technical education programs to meet the needs identified in the comprehensive local needs assessment described in section 134(c) [section 135(a)]. *Arkansas guidelines are found here:*
<https://dcte.ade.arkansas.gov/Page/PerkinsV>.
2. Funds are used according to the requirements identified in Section 135 (Local Use of Funds) of the Carl D. Perkins Career and Technical Education Act of 2018, Strengthening CTE for the 21st Century Act.
3. Except as provided in section 131(c)(2), a local educational agency shall not receive an allocation under subsection 133(a) unless the amount allocated to such agency...is greater than \$15,000. A local educational agency may enter into a consortium with other local educational agencies for purposes of meeting the minimum allocation requirement of this paragraph [section 131(c)(1)].
4. The eligible agency (State of Arkansas) shall waive the application of section 131(c)(1) in any case in which the local educational agency is located in a rural, sparsely populated area; or is a public charter school operating secondary school career and technical education programs; and demonstrates that the local educational agency is unable to enter into a consortium for purposes of providing activities under this part [section 131(c)(2)].
5. No funds made available under the Carl D. Perkins Career and Technical Education Act of 2018, Strengthening CTE for the 21st Century Act shall be used: to require any secondary school student to choose or pursue a specific career pathway or program of study; or to mandate that any individual participate in a career and technical education program, including a career and technical education program that requires the attainment of a federally funded skill level, standard, or certificate of mastery [section 214]. [20 U.S.C. 2394].
6. No funds received under the Carl D. Perkins Career and Technical Education Act of 2018, Strengthening CTE for the 21st Century Act may be used to provide career and technical education programs or programs of study to students prior to the middle grades (as such term is defined in section 8101 of the Elementary and Secondary Education Act of 1965), except that equipment and facilities purchased with funds under this Act may be used by such students [Section 215] [20 U.S.C. 2395].
7. Nothing in this Act shall be construed to be inconsistent with applicable Federal law prohibiting discrimination on the basis of race, color, sex, national origin, age, or disability in the provision of Federal programs or services. [Section 216] [20 U.S.C. 2396].

Joint Secondary/Postsecondary Policy on Purchase of Industry-Recognized Certifications

Legal Requirement

Requires sub-recipients to report student attainment of career and technical skill proficiencies, including student achievement on industry-recognized certifications that align with industry-recognized standards. To meet this requirement, high schools and colleges may use Perkins funding to purchase these industry-recognized certifications for individual students.

Definition of Certifications

The definition of certifications in this guidance includes technical skills or job readiness tests, certifications or licensures which may be received from state and federal agencies or from business and industry or related organizations.

Methods of Purchase

Perkins funds may be used to purchase industry-recognized certifications by the local school district, consortium, or college on behalf of individual students

Nondiscrimination

The institution must assure nondiscrimination. This policy must be applied equally to all CTE students.

Conditions and Requirements

Certain conditions and requirements apply to these purchases:

- The results of the certifications must be made available to the institution for Perkins accountability reporting. Purchases from vendors that are unwilling or unable to provide certification results for individual students cannot be made with Perkins funds. Students must provide certification results prior to receiving reimbursement for certification of expenses.
- It is at the discretion of the institution to determine which certifications will be purchased.
- An activity must be approved as part of the institution's annual plan prior to purchase of certifications.
- Certifications must be taken while the student is enrolled at the institution or within a timeframe that permits the results of the certifications to be received by the institution during the following academic year.
- The student must reside in Arkansas or be enrolled in a public educational institution at the time the certification is taken.

UNITED STATES DEPARTMENT OF EDUCATION GUIDANCE

Using Federal Funds for Conferences and Meetings

Grantees must take into account the following factors when considering the use of grant funds for conferences and meetings:

- Before deciding to use grant funds to attend or host a meeting or conference, a grantee should consider:
 - Whether a face-to-face meeting or conference is the most effective or efficient way to achieve the desired result and whether there are alternatives, such as webinars or video conferences, that would be equally or similarly effective and more efficient in terms of time and costs than a face-to-face meeting.
 - How the meeting or conference will be perceived by the public; for example, will the meeting or conference be perceived as a good use of taxpayer dollars?
 - How many people should attend a meeting or conference on its behalf? The number of attendees should be reasonable and necessary to accomplish the goals and objectives of the grant.
 - Is it necessary to attend the entire meeting or conference, or whether attending only a portion of the meeting or conference is reasonable and necessary.
 - When a grantee is hosting a meeting, the grantee should structure the agenda for the meeting so that there is time for participants to purchase their own food, beverages, and snacks.

(The Administrator's Handbook on EDGAR, 5th Edition (p.256 – 258))

A working lunch is an example of a cost for food that might be allowable under a Federal grant if attendance at the lunch is needed to ensure the full participation by conference attendees in essential discussions and speeches concerning the purpose of the conference and to achieve the goals and objectives of the project.

- If attending a meeting or conference is necessary to achieve the goals and objectives of the grant, *and* if the expenses are reasonable (based on the grantee's own policies and procedures, and State and local laws), Federal grant funds may be used to pay for travel expenses of grantee employees, consultants, or experts to attend a meeting or conference.
- Grantees may use Federal grant funds to pay expenses for transportation, per diem, and lodging if the costs are reasonable and necessary.
- Grantees must follow all applicable statutory and regulatory requirements in determining whether costs are reasonable and necessary, especially the Cost Principles for Federal grants set out at 2 CFR Part 200 Subpart E of the, "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards." In particular, remember that:
 - Federal grant funds cannot be used to pay for alcoholic beverages;
 - Federal grant funds cannot be used to pay for entertainment, which includes costs for amusement, diversion, and social activities.

- A meeting or conference hosted by a grantee and charged to a Department grant must not be promoted as a U.S. Department of Education conference. This means that the seal of the U.S. Department of Education must not be used on conference materials or signage without Department approval.
- All meeting or conference materials paid for with grant funds must include appropriate disclaimers, such as the following:

The contents of this (insert type of publication; e.g., book, report, film) were developed under a grant from the U.S. Department of Education. However, those contents do not necessarily represent the policy of the U.S. Department of Education, and you should not assume endorsement by the Federal Government.
- Grantees are responsible for the proper use of their grant awards and may have to repay funds to the Department if they violate the rules on the use of grant funds, including the rules for meeting- and conference-related expenses.
- Grantees are strongly encouraged to contact their project officer with any questions or concerns about whether using grant funds for a meeting or conference is allowable prior to committing grant funds for such purposes.
- A short conversation could help avoid a costly and embarrassing mistake.

