

Georgia Department of Education

FY2019 Guidelines for Use of Perkins IV Funds

(Includes Required and Permissive Uses of Perkins IV Funds)

Revised July 2018

Career, Technical and Agricultural Education

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Guidelines for the Use of Perkins IV Funds

General Authority

The primary use of Perkins funds received by the eligible recipient is to improve or expand career education and improve student academic and technical performance. *Perkins IV cannot be used to maintain career education programs.*

Allocations

The formula for determining the allocation of Perkins IV funds is established in Federal legislation.

Reallocation of Perkins Funds

Federal funds that are not approved by September 30th of the current fiscal year are subject to be by formula for use during the current or following fiscal year to LEAs with applications approved for federal funding.

Enforcement - Remedies for noncompliance.

If a grantee or subgrantee materially fails to comply with any term of an award, whether stated in a Federal statute or regulation, an assurance, in a State plan or application, a notice of award, or elsewhere, the awarding agency may take one or more of the following actions, as appropriate in the circumstances:

- (1) Temporarily withhold cash payments pending corrective action of the deficiency by the grantee or subgrantee or more severe action by the awarding agency.
- (2) Disallow (that is deny both use of funds and matching credit for) all or part of the cost of the activity or action not in compliance.
- (3) Wholly or partly suspend or terminate the current award for the grantee's or subgrantee's program.
- (4) Withhold further award for the program, or
- (5) Take other remedies that may be legally available.

Required and Permissive Uses of Perkins

Recent audit findings in other states have identified audit exceptions where the LEA failed to address all nine of the Required Uses of Funds as defined in the Federal Law. **Note: When expending Perkins funds, the LEA must address/meet all 9 "Required" activities, before they can use these funds to address the "Permissive" activities.**

Funds made available to an eligible recipient (LEA) may be used for improving, enhancing, and expanding CTAE Programs of Study. All aspects of the use of Perkins IV funds must be supported by data, rationale, a local improvement plan, and the district must have the capacity to measure students/program improvement resulting from the use of these funds.

REQUIRED USES OF PERKINS FUNDS

SECTION 135 (b) REQUIRED USES: Funds made available to eligible recipients under this section shall be used to support career and technical education programs that:

- (1) 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.
- (2) Strengthen the academic and career and technical skills of students participating in career and technical education programs, by strengthening the academic and career and technical education components of such programs through the integration of academics with career and technical education programs through a coherent sequence of courses, such as career and technical programs of study described in 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.
- (3) 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, including–
 - A. In-service and pre-service training on
 - i. effective integration and use of challenging academic and career and technical education provided jointly with academic teachers to the extent practicable;
 - ii. effective teaching skills based on research that includes promising practices;
 - iii. effective practices to improve parental and community involvement; and
 - iv. effective use of scientifically based research and data to improve instruction.
 - B. Support of education programs for teachers of career and technical education in public schools and other public school personnel who are involved in the direct delivery of educational services to career and technical education students, to ensure that such teachers and personnel stay current with all aspects of an industry;
 - C. Internship programs that provide relevant business experience; and
 - D. Programs designed to train teachers specifically in the effective use and application of technology to improve instruction.
- (4) Develop, improve, or expand the use of technology in career and technical

education, which may include:

- A. Training of career and technical education teachers, faculty, and administrators to use technology, which may include distance learning;
 - B. Providing career and technical education students with the academic and career and technical skills (including the mathematics and science knowledge that provides a strong basis for such skills) that lead to entry into the technology fields; or
 - C. Encouraging schools to collaborate with technology industries to offer voluntary internships and mentoring programs, including programs that improve the mathematics and science knowledge of students.
- (5) Provide students with strong experience in and understanding of all aspects of an industry, which may include work-based learning experiences.
- (6) Link career and technical education at the secondary level and career and technical education at the postsecondary level, by offering the relevant elements of not less than one career and technical program of study described in section 122(c)(1)(A).
- (7) Provide services and activities that are of sufficient size, scope, and quality to be effective.
- (8) Provide activities to prepare special populations, including single parents and displaced homemakers who are enrolled in career and technical education programs, for high skill, high wage, or high demand occupations that will lead to self-sufficiency.
- (9) Initiate, improve, expand, and modernize quality career and technical education programs, including relevant technology.

PERMISSIVE USES OF PERKINS FUNDS

SECTION 135 (c) PERMISSIVE Uses: Funds made available to an eligible recipient under this title may be used:

- (1) To involve parents, businesses and labor organizations in the design, implementation and evaluation of CTE programs.
- (2) To provide career guidance and academic counseling, including information described in Section 118, for students participating in CTE programs that improves graduation rates and provides information on postsecondary and career options.
- (3) For local education and business partnerships, including for work-related experiences for students, and industry experience for teachers and faculty.
- (4) To provide programs for special populations.
- (5) To assist career and technical student organizations.
- (6) For mentoring and support services.
- (7) To provide assistance for leasing, purchasing, upgrading or adapting equipment including Instructional Aid and Publications.
- (8) For teacher preparation programs that address the integration of academic and CTE and that assist individuals who are interested in becoming CTE teachers and faculty, including individuals with experience in business and industry.
- (9) For developing and expanding postsecondary program offerings (Education and Career Partnerships) at times and in formats that are accessible for all students, including through the use of distance education.
- (10) To develop initiatives that facilitates the transition of sub-baccalaureate career and technical education students into baccalaureate degree programs.
- (11) To provide CTE programs for adults and school dropouts to complete secondary education or upgrade technical skills.

- (12) For improving or developing new career and technical education courses, including the development of programs of study for consideration by the state and courses that prepare individuals academically and technically for high-skill, high-wage or high-demand occupations and dual or concurrent enrollment opportunities.
- (13) To develop and support small, personalized career-themed learning communities.
- (14) To provide support for family and consumer science programs.
- (15) To support training and activities (such as mentoring and outreach) in nontraditional fields.

ADMINISTRATIVE COSTS

SECTION 135 (d) ADMINISTRATIVE COSTS: Each eligible recipient receiving funds under this part shall not use more than 5 percent of the funds for administrative costs associated with the administration of activities carried under this section. *LEA may use funds from its 5% administrative cap (5% of Program Improvement award) to purchase equipment, supplies, pay clerical support wages to support CTAE Administration. All documentations related to these activities must be kept on file.*

Supplanting with Perkins Funds

Sec. 311-Fiscal Requirements of the Perkins IV Guidelines indicate that “funds made available under this Act for career and technical education activities shall supplement and shall not supplant non-Federal funds (local or state funds) expended to carry out career and technical education activities. “

The intent is always to demonstrate that the expenditure of funds improves or expands career education. In both cases, **the expenditure of funds must be above normal operational expenses.** Therefore, the LEA must provide all state and local funds needed to operate the program in the absence of federal funds (i.e. routine operating expenses such as building maintenance and repairs, landscaping and custodial service, basic teacher and student equipment and supplies). Grantees **may not use federal funds to pay** for services, staff, programs or materials **that would otherwise be paid for with state or local funds.**

Supplanting **occurs when federal dollars replace what is typically paid for by local/state dollars** to support career education programs and activities. Grant recipients must monitor expenditures to ensure that Perkins funds are not supplanting the general requirements of the LEA. This law is designed to ensure that Perkins funds pay for something extra, not the day to day operational costs.

Perkins grant funds must not result in a reduction to state or local funding that would have been available to conduct the activity had these funds not been received. This means that Perkins funds may not free up state or local dollars for other purposes but should create or augment programs to an extent not possible without Perkins dollars. The LEA must be able to demonstrate that Perkins funds are added to the amount of state and local funds that would, in the absence of Perkins funds, be made available for uses specified in the LEA Local Plan.

Supplanting is presumed, if Perkins IV Funds are used:

- To provide services that the recipient is required to make available under other federal, state or local laws;

- To provide services the recipient provided with state or local funds in the prior year;
- To pay for any expense that was previously paid by the local school district; this may include salaries, textbooks, stipends, equipment, etc;

Using Perkins Funds for Instructional Materials, Software and/or Equipment

The Perkins Act of 2006, Section 135, provides the legal definitions for the required and permissive use of funds to support career and technical education. Grant funds from Perkins IV can be used to purchase instructional materials, software, and/or equipment to improve, modernize or expand career and technical education offerings. In addition to this Section of the Law, the U.S. Department of Education has provided non-regulatory guidance to clarify the Congressional intent of certain Sections.

Any instructional materials, software and equipment (both <\$5,000 and >\$5,000 per item) must be justified according to their ability to modernize, improve or expand the career and technical education offerings and align them with current industry standards and expectations.

Instructional materials, software and/or equipment must enhance instruction for students to gain knowledge and skills that meet industry standards and expectations in high wage, high skill and high demand occupations. Instructional materials, software or equipment that is used in hobby, craft or leisure arts courses are not approvable for reimbursement.

It is not permissible to buy residential grade equipment and seek Perkins reimbursement. Any equipment purchased (both <\$5,000 and >\$5,000 per item) **must be industry grade and quality** to be eligible for reimbursement.

Examples of Allowable & Non-Allowable Expenses Aligned with the Required and Permissive Uses of Perkins IV Funds

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| <p>Equipment: <i>“an article of nonexpendable, tangible personal property having a useful life of more than one year.”</i></p> <p><i>Equipment must be used to improve, modernize, or expand CTAE programs.</i></p> <p><i>Equipment usually costs more than \$100 and has a life expectancy of at least more than a year.</i></p> | <p>Allowable Expenses</p> <ul style="list-style-type: none"> • Equipment that will be used by students enrolled in CTAE Programs. <ul style="list-style-type: none"> • Equipment must be purchased early enough in the school year to enable an increase in student performance during the fiscal year purchased. • Equipment that will be utilized in instructing students in CTAE Programs. <ul style="list-style-type: none"> • LEAs may lease, purchase, and upgrade equipment (including instructional aides). • LEAs may pay the cost to maintain or make normal repairs to equipment purchased with Perkins IV funds as long as the expenditures adhere to the budget guidance. A manufacturer’s warranty that covers normal repairs to keep the property in efficient working condition is allowable. If the warranty covers loss and/or damage, it would not be allowable. • The local school district must inventory any equipment purchased with Perkins IV funds. <ul style="list-style-type: none"> • Inventory documentations should be kept on file and made available upon request. Inventory documentation must follow the federal guidelines posted on the GaDOE CTAE website online form. • Equipment must be removed from the inventory records if the program is no longer active; proper disposal guidelines must be followed. |
| <p>Academic Integration</p> | <p>Allowable Expense</p> <ul style="list-style-type: none"> • Expenses directly related to academic integration tied to Perkins Core Indicators (i.e., Math in CTAE). |

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| <p>Supplies</p> | <p>Allowable Expense</p> <ul style="list-style-type: none"> • Costs incurred for materials, supplies and fabricated parts necessary to carry out a CTAE course activity, including computers and computer accessory devices. • Awards of nominal value not to exceed \$10.00 (e.g., certificates and cords) as incentives for good performance. <p>Non-Allowable Expense</p> <ul style="list-style-type: none"> • Consumable supplies to be made into products to be sold or to be used personally by students, teachers, or other persons. |
| <p>Technical Skill Attainment</p> | <p>Allowable Expense</p> <ul style="list-style-type: none"> • The cost of tests associated with the End of Pathway assessments. Local funds may also be used to support this activity. |
| <p>Education and Business Partnerships & Collaborations</p> | <p>Allowable Expenses</p> <ul style="list-style-type: none"> • The cost associated with: <ul style="list-style-type: none"> • Involving parents, businesses, and labor organizations as appropriate (all grantees are required to have an active advisory committee; these committees may be shared between programs). • For printing and postage • For local education and business partnerships • Providing summer internships for teachers/counselors/administration (participants may not receive a stipend, if under contract). <p>Non-Allowable Expenses</p> |

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| | <ul style="list-style-type: none"> • For meals |
| <p>Career and Technical Student Organizations (CTSO). <i>Each program is expected to have student leadership identified and to assist career and technical student organizations in leadership activities.</i></p> | <p>Allowable Expenses</p> <ul style="list-style-type: none"> • Advisor travel and registration to conferences, competitions, leadership activities. • Support of student CTSO organization instruction that is an integral part of the CTAE Program of Study. • Instructional supplies, materials, and equipment needed to support a student organization as an integral part of the CTAE Program. • Purchase of uniforms to be used by students in CTSOs; must remain the property of the CTAE program. <p>Non-Allowable Expenses</p> <ul style="list-style-type: none"> • Lodging, food, conveying or furnishing transportation to conventions and other gatherings of CTSO students. • Purchase of supplies, uniforms, and other effects for personal ownership or usage. • Cost of non-instructional activities such as athletic, social or recreational events. • Printing and disseminating of non-instructional materials. • Purchase of awards for recognition of students, advisors or other individuals. • Student dues and registration fees. |

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| <p>Teacher Travel to National/State Conferences that meets the requirements of Section 135(b)(5)(A).</p> | <p>Allowable Expense</p> <ul style="list-style-type: none"> • Travel to national and state professional development conferences (ex. National Business Educator’s Association); the documentation must denote that it meets the Perkins IV requirements for Professional Development. Conference attendees are responsible to share information with other staff to make improvements to curriculum in an effort to improve overall program quality. |
| <p>Professional Development Activities</p> | <p>Allowable Expense</p> <ul style="list-style-type: none"> • The cost of professional development activities that: <ul style="list-style-type: none"> • Are of high quality, sustained, intensive, and classroom focused as well as a part of a professional development plan. • Help CTAE teachers and personnel improve student achievement. • Help CTAE teachers and personnel stay current with all aspect of an industry. • Allow CTAE teachers to effectively develop rigorous and challenging integrated curricula (jointly with academic teachers) to the extent practicable. • Develop a higher level of academic and industry knowledge and skills. • Registration for a state or national conference affiliated with a program area can only be paid at the member rate. <p>Non-Allowable Expense</p> <ul style="list-style-type: none"> • Federal funds cannot be used for tuition for instructors to obtain advanced degrees or certifications. |
| <p>CTAE Professional Organization Memberships</p> | <p>Non-Allowable Expense</p> <ul style="list-style-type: none"> • Cost of individual memberships in a business, technical, professional, social or civic/community organization is not allowable. |

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| <p>CTAE Support Staff Salaries</p> | <p>Allowable Expense</p> <ul style="list-style-type: none"> • Funds to pay support staff salaries to start up a program <ul style="list-style-type: none"> • This initiative may continue for a maximum of three years. Prior approval of this expense is required by GaDOE CTAE Staff. Requires a Personnel Activity Report (PAR). <p>Non-Allowable Expense</p> <ul style="list-style-type: none"> • Salary for school support staff that is maintained beyond the three-year period (<i>refer to page 6 for allowable administrative cost explanation</i>). |
| <p>Middle School Students (see Section 315)</p> | <p>Non-Allowable Expense</p> <ul style="list-style-type: none"> • The state of Georgia does not allow the use of Perkins IV funds to specifically support activities for CTAE students below grade 7. |
| <p>Career Guidance</p> | <p>Allowable Expense</p> <ul style="list-style-type: none"> • Funds used to provide career guidance and academic counseling for students participating in CTAE Programs. |
| <p>Training in CTAE identified Non-Traditional fields</p> | <p>Allowable Expenses</p> <ul style="list-style-type: none"> • The cost to support training and activities in non-traditional fields. • The cost of mentoring and outreach activities in non-traditional fields. |
| <p>Support for Special Populations</p> | <p>Allowable Expenses</p> <ul style="list-style-type: none"> • Leasing, purchasing, upgrading or adapting equipment or instructional aides or devices to support the attainment of skills in the classroom. • Testing materials |

Consortium Requirements

Sec 131 (Secondary) provides the following guidance on consortia

Consortium Requirements:

1. **ALLIANCE**-{Section 131 (f)(1)}, any Local Education Agency (LEA) receiving an allocation that is not sufficient to conduct a program which meets the requirements of section 135 is encouraged to:

A. form a consortium or enter into a cooperative agreement with an area career and technical education school or educational service agency offering programs that meet the requirements of section 135;

B. operates programs that are of sufficient size, scope, and quality to be effective.

2. **FUNDS TO CONSORTIUM**—Per Section 131(f)(2), funds allocated to a consortium formed to meet the requirements of section 135 shall be used only for purposes and programs that are mutually beneficially 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 1 member of the consortium.

A. **Data**—The Secretary shall collect information from eligible agencies regarding the specific dollar allocations made available by the eligible agency for career and technical education programs under subsections 131(a), (b), (c), (d), and (e) and how these allocations are distributed to local educational agencies within the State in accordance with this section.

Allocation of Funds within a Consortium

The allocation of the Perkins funds must be done at the consortium level. The consortium CANNOT “grant back” the money to the individual schools. The legislation is very clear that a grant back situation can cause the entire amount to be reclaimed by the US Department of Education.

Example: If a school generates \$5,600 through the formula and cooperates with a consortium, they are not guaranteed \$5,600 to be spent on their career education programs. The consortium must review the career education needs of all the schools and allocate the money on business education, and then all business education programs in the consortium must have the opportunity to participate.

The consortium members must have input on the allocation of funds. Any equipment or instructional materials purchased remain the property of the consortium and must be clearly identified as such.

SUMMARY OF NON-ALLOWABLE USE OF FUNDS

- Acquisition of equipment for personal use
- Capital Expenditures: Expenditures for the acquisition costs of capital assets (non-instructional equipment, building, land), or expenditures to make improvements to capital assets that materially increase their useful life value; this also includes the cost of modifications, attachments, accessories, or auxiliary apparatus necessary to make the asset usable for the purpose for which it was acquired.
- 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 expenditures for students
- Dues & memberships to professional organizations or societies for individuals
- Equipment and supplies for building maintenance
- Facility construction to include concrete pads for greenhouses
- Fines and penalties
- Funding activities that would supplant (replace) requirements of LEA
- Furniture, files and equipment used by the teacher unless it is an integral part of an equipment workstation or to provide reasonable accommodations to CTAE program students with disabilities
- General storage files or cabinets not designed to store specific tools or equipment
- Gifts, gift cards, or door prizes for students or others
- Instructional aides, uniforms, tools or other items to be retained by students
- Interest and other financial costs
- Leasing vehicles, car rentals, etc.
- Meals, banquets, or entertainment except as allowable under travel regulations
- Promotional materials such as T-shirts, pens, cups, key chains
- Paying for remedial courses
- Renovation of the school facility including wall plates, electrical outlets, computer/data drops for classrooms or labs
- Standard classroom furniture not unique to CTAE instructional program
- Subscriptions to magazines or journals not directly related to CTAE programs of study
- Transportation of students
- Travel outside of the US (except by prior approval of GaDOE CTAE Accountability Unit)
- Tuition costs, university fees, distance learning fees (for student and teachers)
- Vehicles such as automobiles, trucks, buses, airplanes, boats, golf carts, motorcycles, trailers, and tractors.
- JROTC is a federally funded program and not eligible for Perkins funds except travel and registration to attend CTAE specific meetings and conferences.