2023-2024 Perkins Handbook

CTE™ Learning that works for North Carolina

2023-2024

Perkins Handbook

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April 2023

North Carolina Community College System

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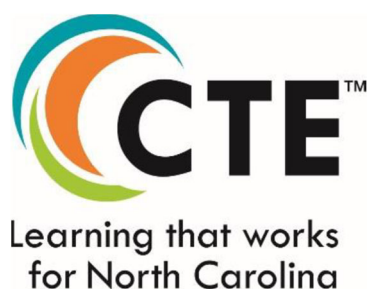- 1C SBCCC 200.95

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Message from the Postsecondary CTE Director

To our Perkins contacts:

Welcome to the 2023-24 program year, North Carolina's 4th year of implementing Perkins V at our Community Colleges. By now, most of you are probably familiar with words and phrases such as: The Comprehensive Local Needs Assessment, Work-based Learning, Special Populations, Career Development, Programs of Study, Career Pathway Frameworks, equity and access, and faculty recruitment and retention. As the local Perkins Contact, you are key to managing the basic grant at your community college and words and phrases such as the Moodle, the plan and budget aligned to the CLNA, Edgar 5th, mid- and end-of-year reviews, as well as modifications are commonplace. If you are new, or a returning coordinator, we welcome you back and offer this handbook as a guide to the spirit and letter of the grant, accountability, and the fiscal management of Perkins V.

If we step back and take this all in, the bottom line is your coordination is key to the success of this project at your college, key in "Strengthening your Workforce" through academic, technical, and employability skills. We appreciate your work in ensuring CTE courses are aligned to regional labor market needs, listening to and integrating your stakeholders in better preparing our students through college coursework with work-based learning to earning those postsecondary credentials that allow our students entry into careers earning sustainable wages.

You are our direct connection to the colleges as together we build student skills with our well-trained faculty and programs of study aligned with regional workforce needs. We do this by working with our K-12 partners, informing middle school students of career opportunities, and linking high school students to our 9-14 programs of study. Our extended work with career pathways in partnership with Workforce Development Boards and other community partners is key in identifying and engaging individuals with disabilities, who are economically disadvantaged, single parents, English learners, homeless, or just plain out of the workforce in postsecondary Career and Technical Education. This work is important as we, through and with our stakeholders, provide support to our students along the way to skill building, education, and opportunities for a more sustainable work life.

Building skills for tomorrow's workforce can be ours with collaboration of many stakeholders to better prepare our students careers with sustainable wages. Thanks for all you do, thanks for working with our Perkins team as we help guide and encourage you in your daily work.

Keep up the good work,

Bob

2023 – 2024 Perkins V Handbook

Introduction

This handbook explains the policies, guidance, and procedures for the implementation of Carl D. Perkins Career and Technical Education Act of 2006 as amended by the Strengthening CTE for the 21st Century Act in 2018 (Perkins V or the Act). This handbook is written for colleges within the North Carolina Community College System (NCCCS) who receive Perkins funding.

Additional resources for compiling this guide came from the United States Education Department General Administrative Regulations (EDGAR) 2 CFR §200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, and the current North Carolina State Career and Technical Education Plan.

This handbook is subject to updates during the academic year at the discretion of the Post-secondary CTE Director. Revisions will be posted on the NCPerkins front page.

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NCCCS CTE Coordinators are assigned colleges and are that institution's point of contact for questions and assistance with their Perkins Basic Grant.

📍 Patti Coultas, CTE Program Coordinator

Beaufort County Community College	Martin Community College
Bladen Community College	Nash Community College
Brunswick Community College	Pamlico Community College
Cape Fear Community College	Pitt Community College
Carteret Community College	Richmond Community College
Coastal Carolina Community College	Roanoke-Chowan Community College
College of The Albemarle	Robeson Community College
Craven Community College	Sampson Community College
Edgecombe Community College	Sandhills Community College
Fayetteville Technical Community College	Southeastern Community College
Halifax Community College	Vance-Granville Community College
James Sprunt Community College	Wake Technical Community College
Johnston Community College	Wayne Community College
Lenoir Community College	Wilson Community College

🔴 Anne Bacon, CTE Program Coordinator

Alamance Community College	McDowell Technical Community College
Asheville-Buncombe Technical Community College	Mitchell Community College
Blue Ridge Community College	Montgomery Community College
Caldwell Community College and Tech. Institute	Piedmont Community College
Catawba Valley Community College	Randolph Community College
Central Carolina Community College	Rockingham Community College
Central Piedmont Community College	Rowan-Cabarrus Community College
Cleveland Community College	South Piedmont Community College
Davidson-Davie Community College	Southwestern Community College
Gaston College	Stanly Community College
Haywood Community College	Tri-County Community College
Isothermal Community College	Western Piedmont Community College
Mayland Community College	Wilkes Community College

⭐ Dr. Mary Olvera, CTE Program Coordinator

Durham Technical Community College	Guilford Technical Community College
Forsyth Technical Community College	Surry Community College
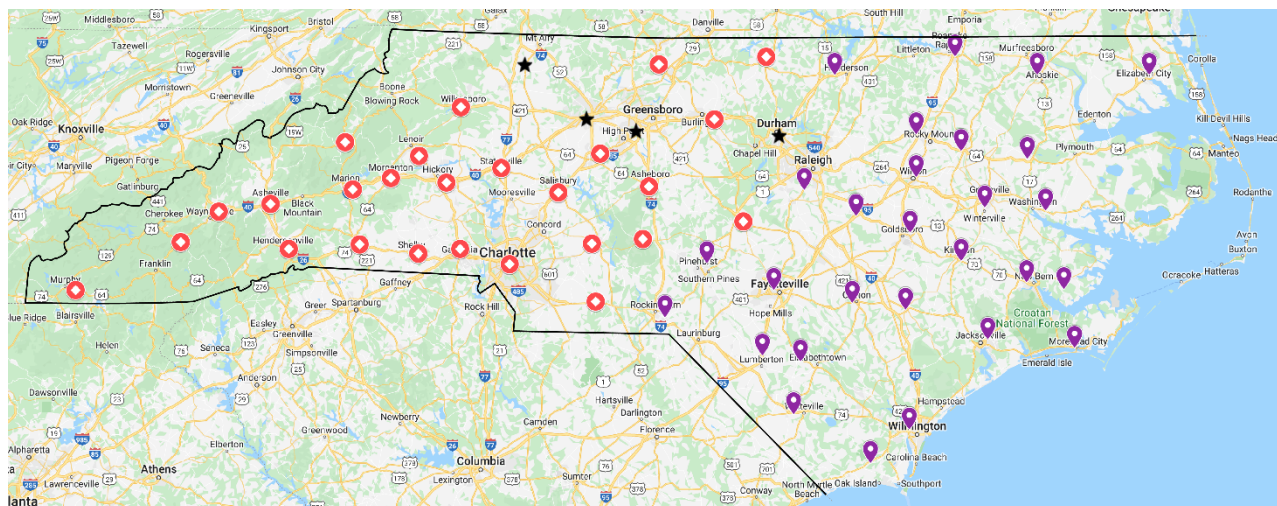
2023-2024 Timeline

Monthly Perkins Technical Assistance Webinars (required) are held the second Tuesday of each month from 9:00-10:00AM. To register go to NCPerkins.org/presentations scroll to the date to find each session.

- August 8, 2023
- September 12, 2023
- October 10, 2023
- November 14, 2023

- December 12, 2023
- January 9, 2024
- February 13, 2024
- March 12, 2024

- April 9, 2024
- May 14, 2024
- June 11, 2024
- No July meeting

Significant Dates

June 2, 2023

- ☐ Enter <u>all 5</u> contacts into the 2023-24 Contacts link (update as needed)
- ☐ Submit Signed Allotment Options
- ☐ Submit Signed Assurances
- ☐ Submit local plan and budget
- ☐ Submit job descriptions for all Perkins funded positions through payroll (update as needed)

January 12, 2024

- ☐ Submit Locally Articulated Course List
- ☐ Submit 9-14 Pathways
- ☐ Submit Mid-Year PowerPoint with a Promising Practice and status update
- ☐ Submit Mid-Year Local Plan Status Update
- ☐ Submit December 31, 2023, XDBR
- ☐ Submit Semi-Annual Time Certifications for July-December 2023

February 6, 7, 8 2024, Mid-Year Reviews will be at Caraway Conference Center

May 17, 2024

- ☐ No modifications will be accepted past May 17, 2024
- ☐ Submit new/revised CLNAs (as needed)
- ☐ Submit negotiated Levels of Performance for 2024-25
- ☐ Submit Year-End One Page Highlight Report
- ☐ Submit Final Local Plan Status Update
- ☐ Submit Promising Practice Video
- ☐ Submit updated Application for next grant cycle

* End-Of-Year in-person or virtual reviews TBD

July 12, 2024

- ☐ Submit Final June 30, 2024, XDBR
- ☐ Submit Semi-Annual Time Certifications for January – June 2024

Perkins V Overview

Purpose (Perkins V, Section 2(1-8))

The purpose of the Perkins V Act is to develop more fully the academic knowledge and technical and employability skills of secondary education students and postsecondary education students who elect to enroll in career and technical education programs and programs of study, by—

1. building on the efforts of states and localities to develop challenging academic and technical standards and to assist students in meeting such standards, including preparation for high-skill, high-wage, or in-demand occupations in current or emerging professions;

2. promoting the development of services and activities that integrate rigorous and challenging academic and career and technical instruction, and that link secondary education and postsecondary education for participating career and technical education students;

3. increasing State and local flexibility in providing services and activities designed to develop, implement, and improve career and technical education;

4. conducting and disseminating national research and disseminating information on best practices that improve career and technical education programs and programs of study, services, and activities;

5. providing technical assistance that --

    A. promotes leadership, initial preparation, and professional development at the state and local levels; and

    B. improves the quality of career and technical education teachers, faculty, administrators, and counselors;

6. supporting partnerships among secondary schools, postsecondary institutions, baccalaureate degree granting institutions, area career and technical education schools, local workforce investment boards, business and industry, and intermediaries;

7. providing individuals with opportunities throughout their lifetimes to develop, in conjunction with other education and training programs, the knowledge and skills needed to keep the United States competitive; and

8. increasing the employment opportunities for populations who are chronically unemployed or underemployed, including individuals identified by Perkins V as a special population. (See page 7 for the definition)

Governing Documents

Strengthening Career and Technical Education for the 21st Century Act (**Perkins V**)

The President signed Perkins V in 2018 and the Act took effect in 2019. Perkins is a federal education program that invests in secondary and postsecondary Career and Technical Education (CTE) programs.

Perkins is dedicated to increasing learner access to high quality CTE programs of study. This law seeks to ensure programs meet the changing needs of learners and employers with a focus on systems alignment and program improvement. Thus communities, employers, and learners benefit from Perkins.

Perkins places emphasis on real-world skills and practical knowledge within selected career clusters. CTE is an educational option that provides learners at the secondary and postsecondary levels with knowledge and skills needed for college and work.

Perkins CTE sits at the intersection of education, workforce development, and economic development. Perkins has strong ties with the Elementary and Secondary Education Act (ESEA), the Workforce Innovation and Opportunity Act (WIOA) and The Higher Education Act (HEA). These connections occur though coordinated planning and implementation requirements, cross-statute stakeholder input, and aligned definitions and accountability indicators.

Perkins V has many changes in its implementation such as: Increased **Reserve Fund** to address high numbers and percentages of students in CTE programs in rural areas; stressing rigorous academic standards at the postsecondary level while referencing the WOIA term *recognized postsecondary credential,* which includes industry-recognized credentials and certificates or associate degrees at the sub baccalaureate level. Transcripted (articulated) postsecondary credit, work-based learning, career exploration, and secondary/postsecondary connections are also referenced in the new Perkins act.

Programs of study are emphasized throughout the Perkins legislation, which defines *Programs of Study* as a coordinated, non-duplicative sequence of academic and technical content at the secondary and postsecondary level that incorporate challenging, state-identified academic standards and addresses academic and technical knowledge as well as employability skills aligned to the needs of industries, the region, and state.

Perkins V calls for coordinated **supportive services** for students identified in CTE programs of study as a special populations which now include: (1) Individuals with disabilities; (2) Individuals from economically disadvantaged families, including low-income youth and adults; (3) Individuals preparing for nontraditional fields; (4) Single parents, including single pregnant women; (5) Out-of-workforce individuals; (6) English learners; (7) Homeless individuals; (8) Students who are in or have aged out of, the foster care system; and (9) Students with parents on active duty in the armed forces. Many of these services can be obtained by networking and blending existing programs in the community who serve these populations.

There is an increased emphasis on **work-based learning,** which is clearly defined as sustained interactions with industry or community professionals in real workplace settings (simulated environments as well) that foster in-depth, first-hand engagement with the tasks required of a given career field and must be aligned to curriculum and instruction.

Accountability under Perkins V at the postsecondary level will include:

- The percentage of CTE concentrators who during the second quarter after program completion, remain enrolled in postsecondary education, are in advanced training, military service, a service program, the peace corps or are placed or retained in employment.

- The percentage of CTE concentrators who receive a recognized postsecondary credential during participation in or within one year of program completion.

- The percentage of CTE concentrators in CTE programs that lead to non-traditional fields.

The largest addition to the new law is the **comprehensive local needs assessment** that is conducted every two years, informs the local plan and includes reviews of these five elements:

1) Student performance on the performance indicators including the performance of special populations and subgroups;

2) Whether CTE program are of sufficient size, scope, and quality to meet the needs of all students served by the college and are meeting labor market needs;

3) Progress toward implementation of CTE programs and programs of study;

4) How the college will improve recruitment, retention, and training of CTE professionals including underrepresented groups; and

5) Progress toward implementation of equal access to high-quality CTE courses and programs of study for all students.

Each local college will consult local groups during the needs assessment process and development of the local application including but not limited to: 1) secondary and postsecondary educators, 2) administrators and other support staff, 3) state and local workforce development boards, 4) business and industry representatives, 5) parents and students, 6) representatives of special populations, 7) representatives of agencies serving out of school youth, homeless children, and at-risk youth, 8) representatives of Indian Tribes (where applicable), and other stakeholders.

The **local application** to be eligible for funding will include at a minimum:

1) a description of the comprehensive local needs assessment,

2) Information on state approved CTE programs of study at the college,

3) How the college with the local workforce board and workforce agencies, one stop delivery systems, and other partners will provide a series of career exploration and career guidance activities,

4) How the college will improve academic and technical skills of students in CTE programs by strengthening the academic and CTE components of such programs through integration,

5) How colleges will provide activities to prepare special populations for high-skill, high-wage, or in-demand occupations that will lead to self-sufficiency, prepare students for nontraditional fields, provide equal access for special populations to CTE courses, programs and programs of study, to ensure that members of special populations are not discriminated against on the base of their status as members of special populations,

6) A description of the work-based learning opportunities that the college will provide to students participating in CTE programs and how the college will work with representatives from employers to develop or expand work-based learning opportunities for CTE students,

7) A description of how the college will provide students participating in CTE the opportunity to gain postsecondary credit while still attending high school,

8) A description of how the college will work to support the recruitment, preparation, retention, and training including professional development of teachers, faculty, administrators and specialized instructional support personnel and

9) A plan for continuous improvement that addresses disparities or gaps in student performance between plan years.

Local (Basic Grant) funds are to be spent to develop, coordinate, implement, and improve career and technical education programs to meet the needs identified in the comprehensive local needs assessment. That is, the local basic grant to colleges is linked to their local needs assessment and the resources aligned with the results of the comprehensive local needs assessment.

Six key activities that are required by Perkins of every college to support CTE programs include:

1) Career exploration and career development activities through an organized systematic framework,

2) Professional development for CTE professionals,

3) Provide within CTE Programs of Study skills necessary to pursue high-skill, high-wage, or in-demand sectors or occupations,

4) Support integration of academic skills into CTE programs,

5) Plan to carry out elements that support implementation of CTE program and programs of study that result in increased student achievement, and

6) Develop and implement an evaluation of the activities funded by Perkins.

Source: Adapted from: *Strengthening Career and Technical Education for the 21st Century Public Law 115-224 and Advance CTE – State Leaders Connecting Learning to Work Publications*

Education Department General Administrative Regulations (EDGAR) 34 CFR Parts 75, 76, 81 and Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance) 2 CFR Parts 200 and 3485

EDGAR (Education Department General Administrative Regulations) establishes rules that apply to all education programs. Secondary to the Perkins Act itself, EDGAR is a key reference for this handbook. EDGAR regulations include but are not limited to such issues as application procedures, financial administration, property management, records retention, lobbying, and oversight. Colleges are subject to all applicable areas of the EDGAR. This guidebook includes excerpts from these publications; however, users should become familiar with both of the complete basic documents that apply to them. (Ref: 2 CFR Part 200, Subpart D- Post Federal Award Requirements)

Federal, State, DPI, NCCCS Relationship, Collaboration & Funding

Allocation of the Grant

North Carolina's allocation of Perkins funds is split between secondary and postsecondary. Secondary (middle and high schools) receives two-thirds and Postsecondary (community colleges) receives one-third of the total state Perkins allocation.

Of the funds received at the postsecondary level, 85 percent is distributed to the community colleges, and 15 percent is for state-level expenditures.

The community colleges and consortia of community colleges offering CTE programs are eligible for Perkins funds provided that the funding to be allocated through the formula-funding process is not less than $50,000. Allocations to individual colleges are based on the percentage of postsecondary CTE students receiving Pell Grants and Federal Bureau of Indian Affairs (BIA) assistance.

Each spring, a ***Pell Grant Information and Bureau of Indian Affairs Verification Form*** is sent to the Perkins contact at each college. This form contains the number of CTE students at that college receiving Pell Grants. Colleges are responsible for reporting the number of CTE students receiving assistance from the Federal Bureau of Indian Affairs (BIA). Local Financial Aid staff usually assist in collecting this data. This information is then used to determine funding levels for the individual colleges/consortia.

The formula, as dictated by the Perkins Act, is as follows:

$$\frac{\text{Number of Pell and BIA CTE students at the college}}{\text{Number of Pell and BIA CTE students statewide}} = \text{Percentage of Pell and BIA CTE students at the college} \quad \mathbf{X} \quad \text{Total funds available for distribution}$$

Community colleges not meeting a minimum of $50,000 using this formula are not eligible to receive a direct allotment. They may, however, form a **consortium** with one or more community colleges. In a consortium, one college is designated as the fiscal agent, and the consortium receives the total amount each college would have received individually. Colleges must plan their budget together based on the needs of the consortium. (Perkins section 131(f))
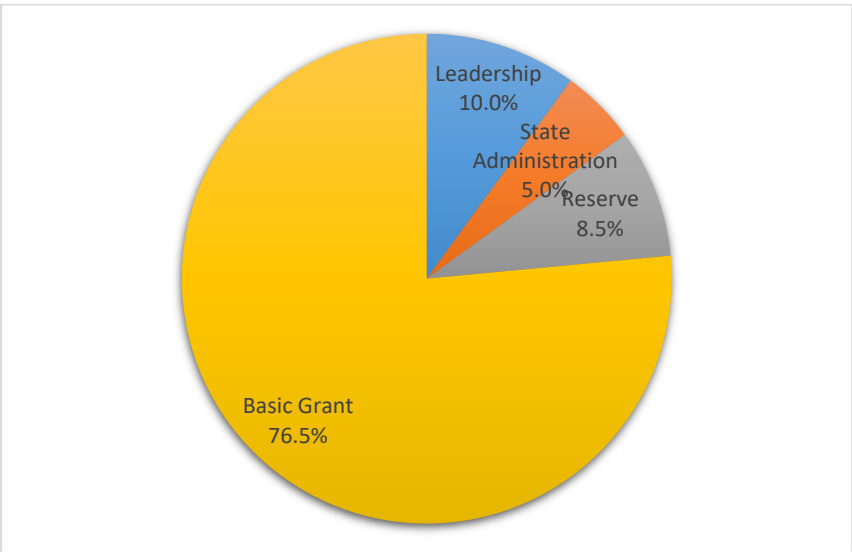
State Level Use of Funds

Administration

Up to 5 percent of the postsecondary allocation is set aside for the administration of the state plan. Administrative funds are used pursuant to Perkins section 112(a)(3).

Leadership

Ten percent of the state funds must be used for state leadership projects. There are specific **mandatory and permissive leadership activities** that are allowed per section 112(a)(2) and section 124 of the Perkins Act.

Leadership Purpose

State leadership projects are designed to inform and improve Career and Technical Education (CTE) Basic Grant activities. These activities develop more fully the academic knowledge, technical and employability skills of postsecondary education students who elect to enroll in CTE programs of study.

Guidelines for Leadership

Each Leadership project will be aligned to Perkins V and include:

1. A purpose consistent with the leadership goals stated above.

2. Clearly defined project goals and objectives.

3. Measurable outcomes that are supported and aligned to at least one Perkins V accountability measure.

4. Project has a detailed budget.

5. Will have oversight and technical assistance from Perkins leadership staff.

6. Will conduct and report on a project evaluation at the completion of the program year.

7. **An eligible agency that receives leadership funds may not use funds for administrative costs.**

Leadership Goals

Improve Career and Technical Education which shall include:

- Preparation for non-traditional fields in current and emerging professions.

- Activities to support special populations.

- Expose students to high skill, high wage and in demand occupations.

- Support CTE educational opportunities for individuals with disabilities and individuals in state institutions such as corrections and juvenile justice.

- Recruiting, preparing, or retaining career and technical education teachers, faculty, specialized instructional support – pre-service, professional development, or leadership development.

- Technical assistance for eligible recipients.

- Report on the effectiveness of the use of such funds in achieving goals for preparing an educated and skilled workforce, meeting the skilled workforce needs of employers including in existing and emerging in-demand industry sectors and occupations as identified by the state, and, how the state's Career and Technical Education programs help to meet those goals in reducing disparities or performance gaps state determined levels of performance of all CTE concentrators.

Accountability

Perkins Core Indicators of Performance

Perkins V has three accountability measures called the Core Indicators of Performance are:

1P1 – Postsecondary Retention and Placement: Section 113(b)(2)(B)(i) states "The percentage of CTE concentrators who, during their second quarter after program completion, remain enrolled in postsecondary education, are in advanced training, military services, or a service program that receives assistance under title I of the National and Community Service Act of 1990, are volunteers as described in section 5(a) of the Peace Corps Act, or are placed or retained in employment."

2P1 – Credential, Certificate or Diploma: Section 113(b)(2)(B)(ii) states "The percentage of CTE concentrators who receive a recognized postsecondary credential during participation or within 1 year of program completion."

3P1 – Non-traditional Program Enrollment: Section 113(b)(2)(B)(iii) states "The percentage of CTE concentrators in career and technical programs and programs of study that lead to non-traditional fields."

Each year, the community colleges negotiate with the State a level of performance, or goal, for each indicator. The NCCCS CTE Team publishes the *Perkins Core Indicators of Performance Report* each year, as well as updates the data dashboard that show the college's progress toward the state and local goals. See https://www.nccommunitycolleges.edu/analytics/dashboards then click on CTE Perkins V from the list.

Colleges not meeting at least 90 percent of their negotiated performance level for each core indicator must write an **improvement plan** that includes action steps to improve their performance. NCCCS will review the college's proposed plans for sufficiency and relevancy and offer recommendations as appropriate. Progress in meeting the improvements will be monitored throughout the life of the plan. Colleges failing to meet or show significant improvement for two consecutive years may be directed to address the core indicator with an agreed upon portion of their Perkins allocation.

Local Use of Funds

About the Funds

Perkins CTE grants are designed to enhance Career and Technical Education programs of study in curriculum programs, not continuing education. With the implementation of Perkins V there has been a shift in how colleges decide how to spend these funds. Colleges must conduct a comprehensive local needs assessment (CLNA) with input from a diverse body of stakeholders. The stakeholders must include secondary and post-secondary representative of CTE programs; representatives of the State or local workforce development boards and a range of businesses or industries; parents and students; representatives of special populations; and regional or local agencies serving homeless and at-risk youth. With the inclusion of a CLNA, the Perkins **Basic Grant Funds** must be focused on preparing students for "in-demand industry sectors or occupations." The Act allows funds to be spent on emerging industries as workforce needs are determined during the CLNA. The goal is to prepare the local workforce to positively impact the local community. All funds spent must be directly tied to a need determined by the CLNA.

The Basic Perkins Grant is federal funding to improve and boost CTE 9-14 programs of study. If each program of study at the college receives a supply budget, these local funds for supplies cannot be replaced with federal funds (supplanting). Funds to a particular program can be enhanced (supplement). Perkins funds may be spent to supplement budgets used to outfit new programs and may be used for curriculum development of a new program.

In accordance with the Perkins legislation, Section 135(b)(1) through (6), colleges must conduct certain activities. See page 9 of this handbook for the required uses of funds.

NCCCS may take advantage of section 112(c)(1) of the Perkins Act to reserve not more than 15 percent of the 85 percent of the Perkins pass-through funds to make grant awards to eligible colleges to carry out the activities enumerated in section 135 (local use of funds). These funds, called **Reserve Funds**, will be distributed based on a formula established by the State CTE Director and approved by the NC State Board on Community Colleges.

Managing the Perkins Basic Grant at your College

NCCCS recommends that each college set up a Perkins team to assist in oversight, planning, and implementation of the grant that includes, at a minimum, the Chief Academic Officer and CTE Deans. It is also important to consult additional staff at the college in planning, such as the Chief Financial Officer and Chief Student Development Officer.

Management of the Perkins Basic Grant consists of the following:

- Review current CLNA summaries and determine if they need to be updated or if any new needs assessments **should be** conducted on additional programs.
- Using the **needs identified in the CLNAs**, collaboratively develop, write, and submit for approval, your college's postsecondary Perkins local plan and budget with your college team and finance officer.
- Ensure the Perkins Basic Grant Acceptance of Allotment and Assurances are signed and followed **(adhered to)** with appropriate EDGAR guidance.
- Coordinate the implementation of grant-funded activities throughout the year.
- Coordinate spending with all CTE Programs of Study **that are supported through the CLNA Process.**
- Prepare and submit modifications on the local plan and budget as needed.

Local Plan

Colleges that choose to accept Perkins funds must complete a process that includes the following elements:

- **Plan** that describes activities in the six required activity areas outlined in Perkins V – your local plan should tell us how your college is addressing these required activities and how each activity meets a need(s) in the CLNA.

- **Budget** that corresponds to the local plan

- Signed Statement of **Assurances**

- Signed **Allotment Acceptance** form

- **Job Descriptions** of any positions funded in full or in part by Perkins

- Perkins **contact information**

- Develop 9-14 CTE Pathways

The Local Plan and Budget must be approved prior to spending Perkins funds. Distribution of any Reserve Funds will be in a separate plan and budget.

Local (Basic Grant) funds are to be spent to develop, coordinate, implement, and improve career and technical education programs to meet the needs identified in the **comprehensive local needs assessment (CLNA)**. The local basic grant to colleges must be linked to their CLNA.

There are six activities which are required under Perkins V at each college receiving Perkins V funds. Colleges may use a combination of their federal Perkins funds and/or other funds to carry out these activities.

1) Career exploration and career development activities through an organized systematic framework,

2) Professional development for CTE professionals,

3) Provide within CTE Programs of Study skills necessary to pursue high-skill, high-wage, or in-demand sectors or occupations,

4) Support integration of academic skills into CTE programs,

5) Plan to carry out elements that support implementation of CTE program and programs of study that result in increased student achievement, and

6) Develop and implement an evaluation of the activities funded by Perkins.

Special Populations

Perkins V is designed to level the playing field for the identified special populations. These are defined in Perkins V, §3(48) as

1. Individuals with disabilities;

2. Individuals from economically disadvantaged families, including low-income youth and adults;

3. Individuals preparing for non-traditional fields;

4. Single-parents, including single pregnant women;

5. Out-of-workforce individuals;*

6. English language learners;

7. Homeless individuals described in section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);

8. Youth who are in, or have aged out of, the foster care system;

9. Youth with a parent who –

   a. Is a member of the armed forces (as such term is defined in section 101(a)(4) of title 10, U.S.C.); and

   b. Is on active duty (as such term is defined in section 101(d)(10 of such title).

Additionally, Perkins V, §114(e)(8)(B)(i) requires inclusion of the subgroups from the Elementary and Secondary Education Act of 1965, Section 1111(c)(2)(B). There is only one that is not already included:

10. Students from major racial and ethnic groups;

*Note that certain definitions in the Act differ from common usage. For example, the definition of "Out-of-Workforce individuals" is more similar to "displaced homemakers" than dislocated workers, unemployed individuals or those who have dropped out of the labor force.

See Appendix A for a comparison of the Perkins V definition and the CFNC definition.

Programs of Study / Career Pathways

The NCCCS Programs of Study are defined in the Curriculum Standards, and can be found at
https://www.nccommunitycolleges.edu/academic-programs/curriculum-standards. Of the 11 program areas, 10
are considered Career and Technical Education programs. These are Codes 15 through 60:

• 15 Agriculture & Natural Resources Technologies	• 40 Engineering Technologies
• 20 Biological & Chemical Technologies	• 45 Health Sciences
• 25 Business Technologies	• 50 Industrial Technologies
• 30 Commercial & Artistic Production Technologies	• 55 Public Service Technologies
• 35 Construction Technologies	• 60 Transportation System Technologies

Perkins V defines "program of study" as

a coordinated, nonduplicative sequence of academic and technical content at the secondary and
postsecondary level that –

(A) Incorporates challenging State academic standards, including those adopted by a State under
section 1111(b)(1) of the Elementary and Secondary Education Act of 1965;
(B) Addresses both academic and technical knowledge and skills, including employability skills;
(C) Is aligned with the needs of industries in the economy of the State, region, Tribal community, or
local area;
(D) Progresses in specificity (beginning with all aspects of an industry or career cluster and leading to a
more occupation-specific instruction);
(E) Has multiple entry and exit points that incorporate credentialing; and
(F) Culminates in the attainment of a recognized postsecondary credential.

Postsecondary Perkins also recognizes the WIOA definition of a career pathway (WIOA Section 3) which

Means a combination of rigorous and high-quality education, training, and other services that –

(A) Aligns with the skill needs of industries in the economy of the State or regional economy involved;
(B) Prepares an individual to be successful in any of a full range of secondary or postsecondary
education options, including apprenticeships registered under the Act of August 16, 1937
(commonly known as the "National Apprenticeship Act"; 50 Stat. 664, chapter 663; 29 U.S.C. 50 et
seq.) (referenced to individually in this Act as an "apprenticeship", except in section 3226 of this
title);
(C) Includes counseling to support an individual in achieving the individual's education and career goals;
(D) Includes, as appropriate, education offered concurrently with and in the same context as workforce
preparation activities and training for a specific occupation or occupational cluster;
(E) Organizes education, training, and other services to meet the particular needs of an individual in a
manner that accelerates the educational and career advancement of the individual to the extent
practicable;
(F) Enables an individual to attain a secondary school diploma or its recognized equivalent, and at least
1 recognized postsecondary credential; and
(G) Helps an individual enter or advance within a specific occupation or occupational cluster.

The Comprehensive Local Needs Assessment requires that programs funded with Perkins V Basic Grant funds
should have a Pathway in place for the program being supported, or in the process of creating a pathway.

Grant Elements Descriptions

Comprehensive Local Needs Assessment

Career and Technical Education (CTE) focuses on providing students with the skills and knowledge needed to pursue specific careers or occupations through integrating academic, technical and employability skills. CTE programs at the community college are designated as Associated of Applied Science courses and include programs in fields such as healthcare, engineering, computer science, culinary arts, child care and many others. To ensure that CTE programs are meeting the needs of students and the local workforce, Perkins V requires a Comprehensive Local Needs Assessment (CLNA) every two year, which may be updated on a regular basis.

The needs assessments are a process that involves gathering and analyzing data to identify the current and future needs of students, employers, and the community in terms of workforce development.

The CLNA process involves the following steps:

1. Gathering and analyzing data around the three accountability measures, disaggregating this data and determining if gaps or needs exist in students gaining employment, earning postsecondary credentials, and equitably participating in non-traditional programs of study,

2. Gathering data on the local economy and job market, including current and future trends in employment,

3. Assessing the current CTE programs and their alignment with local workforce needs,

4. Identifying any gaps or areas of need in the existing CTE programs, as well as opportunities for new or expanded programs,

5. Engaging stakeholders, including employers, educators, parents, and community members, in the process to ensure that their needs and perspectives are considered, and

6. Developing a local plan and budget to address the identified needs and gaps, including strategies for program improvement, new program development, and resource allocation.

Colleges use the NCCCS data dashboards, local program reviews, advisory committee notes, and other relevant data that colleges collect to inform this process.

To aide in the process, the state has provided a snapshot of performance data. Colleges are encouraged to begin the CLNA process by reviewing this disaggregated data as they look more closely at individual programs, clusters of programs, or all CTE programs to better focus the funding and meet identified needs.

By conducting a CLNA, our Perkins contacts, educators and administrators can ensure that their CTE programs are relevant and effective in preparing students for success in the workforce.

More information on completing a CLNA can be found in a separate Guide at NCPerkins.org and in Perkins V section 134(c).

Local Application

For a college to be eligible for funding each college, or consortium, must complete a **local application**. Per the Act, Section 134, the local application shall cover the same time period as the State Plan. Currently, this period is July 2023 through June 2027. Each college has had an application approved; however, it can be updated as needs assessments are completed or updated. The local application must include at a minimum:

1) A summary of the process of how the CLNA was conducted,

2) Identification of supported CTE programs area by a CLNA,

3) How the college, with the local workforce board, workforce agencies, and other partners, will provide a series of career exploration and career guidance activities,

4) How the college will improve the academic and technical skills of students in CTE programs by strengthening the integration of academic and CTE components,

5) How colleges will provide activities to prepare CTE students and those identified as special populations for high-skill, high-wage, or in-demand occupations that will lead to self-sufficiency, prepare student for nontraditional fields, provide equal access for special populations to CTE courses, programs and programs of study, to ensure that members of special populations are not discriminated against on the base of their status as members of special populations,

6) A description of the work–based learning opportunities that the college will provide to students participating in CTE program and how the recipient will work with employer representatives to develop or expand work-based learning opportunities for CTE students,

7) A description of how the college will provide students participating in CTE the opportunity to gain postsecondary credit while still attending high school,

8) A description of how the college will work to support the recruitment, preparation, retention, and training including professional development of teachers, faculty, administrators and specialized instructional support personnel, and

9) A plan for continuous improvement that addresses disparities or gaps in student performance between plan years.

Basic Grant Annual Plan and Budget

Each year the college develops a local plan that describes activities for each required use. These activities may be funded with Perkins Basic Grant or other funding sources. Those funded by Perkins must align with a gap or need identified in their CLNA.

Required Uses of Funds

Perkins V Sec. 135. LOCAL USES OF FUNDS states:

(a) GENERAL AUTHORITY. --Each eligible recipient that receives funds under this part shall use such funds to develop, coordinate, implement, or improve career and technical education programs to meet the gaps identified in the comprehensive needs assessment described in section 134(c).

(b) REQUIRED USES OF FUNDS. --Funds made available to eligible recipients under this part shall be used to support career and technical education programs that are of sufficient size, scope, and quality to be effective.

(1) provide career exploration and career development activities through an organized, systematic framework designed to aid students, including in the middle grades, before enrolling and while participating in a career and technical education program, in making informed plans and decisions about future education and career opportunities and programs of study. For information on specific activities, see Perkins V.

(2) provide professional development for teachers, faculty, school leaders, administrators, specialized instructional support personnel, career guidance and academic counselors, or paraprofessionals. For information on specific activities, see Perkins V.

(3) provide within career and technical education the skills necessary to pursue careers in high-skill, high-wage, or in-demand industry sectors or occupations

(4) support integration of academic skills into career and technical education programs and programs of study to support:

* CTE participants at the secondary school level in meeting the challenging academic standard adopted under ESEA by the state

* CTE participants at the postsecondary level in achieving academic skills

(5) plan and carry out elements that support the implementation of career and technical education programs and programs of study and that result in increasing student achievement of the local levels of performance established under section 113. For information on specific activities, see Perkins V.

(6) develop and implement evaluations of the activities carried out with funds under this part, including evaluations necessary to complete the comprehensive needs assessment required under section 134(c) and the local report required under section 113(b)(4)(B).

Local Plan

The Local Plan of activities is developed using an EXCEL workbook that links the activities, specific expenditures, Perkins-supported wages, and equipment into a budget that is linked across spreadsheets. Each activity also refers to the CLNA(s), identifies which core indicator of performance it addresses, and the funding source.

Colleges must have clearly defined and documented processes as part of their respective policy guidelines for planning and budgeting. The college's Perkins budget has ten primary categories each with its own *Voc Code*. The required uses of funds have been aligned to budget *Voc Codes* 10-16. There are 4 additional *Voc Codes* to allow Team Perkins to better track expenditures statewide in equipment, wages, Career and Technical Student Organizations (CTSOs) and the Reserve Fund. Colleges must align funds for each category with Perkins core indicators. Colleges must establish accounts consistent with these categories so that Perkins funds can be properly identified and required reports submitted. Expenses should be accounted for by category according to federal program guidelines and the NCCCS Chart of Accounts. Copies of all budget forms are available within the Perkins Online Data System. Budgeted items must comply with the U.S. Department of Education's *Education Department General Administrative Regulations*, or "EDGAR".

Voc Code Definitions

10 Administration – As stipulated by Perkins V section 135(d), a college shall use not more than 5 percent of its allotment for **administrative expenses**. Administrative activities are those activities necessary for the effective and efficient performance of the eligible college's duties under Perkins V, including the supervision of such activities. Any cost that supports the management of the Perkins V program is administrative in nature. Examples of allowable administrative costs include, but are not limited to, salary costs associated with the development of the local plan.

The college's 5 percent maximum administrative expenses is reduced by the Workforce Innovation and Opportunity Act (WIOA) sec. 121(h), which requires all required partner programs of the one-stop delivery system to contribute to the infrastructure costs of this system based on proportionate use and relative benefit received. These are non-personnel costs necessary for the general operation of the one-stop center, including: rental of facilities; utilities and maintenance; equipment; and technology to facilitate access.

The total allotment approved by the State Board will be reduced by this amount, **therefore the infrastructure contribution should not be in the local plan and budget**. It is important that colleges pay attention to the total amount they can budget for administration (Voc Code 10) as listed on the State Board item as "Admin Costs Available).

For example: Alamance CC calculated allotment is $250,627 (75,188+175,439). The WIOA infrastructure cost has been calculated to be $126. The available administrative cost listed in the furthest right column is the total 5 percent admin minus the amount for the One-Stop.

Community College	Pell Grant Awards	Percent of Pell Grants	CTE Allotment		Infrastructure Costs^	Total Allotment 2019-20	Admin - 5%	Admin Costs Availalble
			July, Aug., Sept. 2019 Approx. 30%	Oct. 2018- June 2020 Approx. 70%				
Alamance CC	800	1.87%	$75,188	$175,439	($126)	$250,501	$12,531	$12,405

It is important to note that administrative expenses may be used only in proportion to the grant expenditures. For example, if after the first quarter 25 percent of the grant has been spent, then 25 percent of the administrative funds may be billed to the grant.

11 Career exploration and career development (**section 135 (b)(1))** - Provide career exploration and career development activities through an organized, systematic framework designed to aid students before enrolling and while participating in a career and technical education program, in making informed plans and decisions about future education and career opportunities and programs of study. Funds **may** be used for activities that: focus on career exploration and awareness, provide labor market information, assist in development of graduation and career plans, support guidance /career counselors that provide information on postsecondary education and career options, expose students to industry needs or nontraditional fields, and any other activity that advances knowledge of career opportunities and assists students in making informed decisions about education and employment goals.

12 Professional Development (section 135(b)(2) - provide professional development for faculty, school leaders, administrators, specialized instructional support personnel, career guidance and academic counselors, or paraprofessionals. Funds **may** be used for activities that: support training on the implementation of strategies to improve student achievement and close gaps in student participation and performance; provide opportunities to advance knowledge, skills, and understanding in pedagogical practices; train on how to provide appropriate accommodations for individuals with disabilities and English language learners; provide advanced education and training leading to further credentials for faculty and staff that improve teaching and learning; and provide opportunities to advance knowledge, skills, and understanding of all aspects of an industry.

13 Skill Attainment (section 135(b)(3) - provide within career and technical education the skills necessary to pursue careers in high-skill, high-wage, or in-demand industry sectors or occupations. Funds **may** be used for work-based learning opportunities; integration of employability skills; and other activities that increase student engagement and success including simulated work environments. Any equipment purchased for this purpose must be listed under Voc Code 17.

14 Academic Integration (section 135(b)(4)) - support integration of academic skills into career and technical education programs and programs of study. Funds may be used for instructional technology equipment that expands the use of technology to enhance teaching such as distance learning. Funds may also be used to support tutors.

15 Increase Student Achievement (section 135(b)(5)) - plan and carry out elements that support the implementation of career and technical education programs and programs of study and that result in increasing student achievement of the local levels of performance established under section 113. Funds **may** be used for activities on curriculum alignment; collaborative relationships; accelerated learning programs; activities that increase student access to CTE programs; support for career and technical student organizations; support to reduce or eliminate out-of-pocket expenses for special populations participating in career and technical education; other activities to improve career and technical education programs.

16 Evaluation of CTE Programs (section 135(b)(6)) -develop and implement evaluations of the activities carried out with funds under this part, including evaluations necessary to complete the comprehensive local needs assessment.

17 Equipment (section 135(b)(5)(D)) – Equipment is defined as a capital expenditure and high risk items such as computers and portable electronic devices. A separate tab in the Local Plan specifically for equipment is for additional information needed for monitoring, and each unique piece of equipment should be listed on a separate line along with the number of pieces of equipment represented in the total budget line item (e.g., 10 ThinkPad X1 laptops: $24,990). See EDGAR Section 200.1 definition of equipment.

18 Wages: Salary for faculty, staff and other supportive personnel (not Administrative) (section 135(b)(5)(G)) Funds **may** be used for efforts to support salaries, recruit and retain career and technical education faculty, and staff, administrators, specialized instructional support personnel, career guidance and academic counselors and

paraprofessionals. Indicate which Voc Code activities each position is responsible for in the description. A separate tab in the plan specifically for employees is for additional information needed for monitoring.

19 Career and Technical Student Organizations (section 135(b)(5)(O)) support career and technical student organizations. (It is recommended not more than 10 percent of allotment be used for this Voc Code) Funds **may** be used for CTE student preparation for, and participation in technical skills competitions aligned with career and technical education or upgrade technical skills. Funds **may** be used to support CTE students and CTE students who are members of special populations as defined by Perkins V section 3(48) in all aspects of participation in Career and Technical Student Organizations including membership dues, uniforms and other activities directly related to the CTSO that may present a financial barrier for participation. It is expected all other avenues of funding assistance will be exhausted before using Perkins funds for special populations assistance in CTSOs.

28 Reserve Fund and other Special Funding

Funds may be allocated to this Voc Code based upon a formula established by the State CTE Director and approved by the NCCC State Board. This includes Reserve Funds and special projects, except for leadership projects.

Annual Budget

The budget is created automatically from the local plan in a separate tab on the local plan template. Budgets must be signed by the Perkins Primary Contact and Chief Financial Officer.

Annual Budget Review and Approval Process

The following general actions are taken for annual Perkins plans and budgets:

1. Colleges will submit their annual Perkins plan and budget in the Perkins Online Data System Moodle in the current year's course located at NCPerkins.org (See Appendix F for specific Moodle directions)
2. All items in the annual plan and budget must clearly align with the Perkins activities outlined in the local plan and identified as a need in the college's CLNA.
3. CTE program coordinators and the CTE Director review and approve the Perkins plans and budgets for compliance with these guidelines.
4. Colleges will receive the approved budgets from their program coordinators and may begin making expenditures once the funds are made available.

Mid-Year Update

Each January colleges must complete the status of each activity in their plan. The two furthest right columns of the plan template are for this purpose. Colleges enter a status then provide a short explanation in the last column. They must also update the equipment list and wages tabs as needed. This update is to show activities planned and accomplished. These updates must be uploaded into NCPerkins.org.

Additionally, there will be an on-line or in-person meeting each January or February. The mid-year meeting will be a time to share practices, allowing colleges to learn from each other. Each college is expected to present promising practices they are implementing.

End-of-Year Update

Each May colleges must complete the final status of each activity in their plan. Starting with the mid-year update, enter an updated status and explanation. The equipment and salaries tabs should be reviewed and updated as needed.

Additionally, each college will submit a report answering the questions provided on a template. A five-minute-or-less promising practices video must also be submitted. In June, each college will be given an allotted time to meet online with the NCCCS CTE Team to discuss their video and year's activities.

Planning Checklist

Each college should consider the following questions to determine if an activity is eligible for Perkins funding:

1. **Does the activity address a gap or need identified by the comprehensive local needs assessment (CLNA)?**

   Perkins V specifically states in section 135(a) that each college "shall use such funds to develop, coordinate, implement, or improve career and technical education programs to meet the needs identified in the comprehensive needs assessment." Each activity funded with Perkins funds in the local plan must directly link to one of the gaps on the CLNA Summary form. The CTE Coordinator will ensure this linkage before approving the plan and budget.

2. **Does the activity address a core performance indicator area that is deficient?**

   Colleges not meeting at least 90 percent of the target for a core performance indicator must provide an improvement plan with their annual Perkins report and allocate funding in their annual Perkins budget to address any core indicator deficiencies. Colleges may use college funding sources in lieu of Perkins funds or combine Perkins funding with other college funding to address deficiencies, so long as the combination of funds do not violate federal, state, or NCCCS funding rules. Perkins funds must also address an identified gap in the CLNA.

3. **Does this activity support the development of a new, or expand an existing CTE program of study/pathway identified in the college's CLNA(s)?**

   Section 135(a) states that the recipient shall use "funds to develop, coordinate, implement, or improve career and technical education programs to meet the needs identified in the comprehensive needs assessment…"

4. **Does this activity address "Required Uses" of Perkins funds (Perkins Act, Section 135)?**

   The college must address all required uses of funds with either Perkins or non-Perkins dollars. Voc Codes 11-16 are aligned to a required Perkins activity and must have at least one activity identified on the local plan. If the college is using Perkins funds, that activity must also address a gap identified in their CLNA(s).

5. **Was the activity funded during the previous year by non-Perkins funds?**

    Perkins funds may not be used to take the place of local or state funding sources or continue activities funded by any state or local funds used in the previous year when those funds still exist. This would be supplanting, which is expressly prohibited by law. Additionally, if the activity is required, it would be supplanting to use Perkins funds. (Perkins 211(a)) Also see the U.S. Department of Justice guidance in Appendix B.

6. **Are there gaps identified by data or other criteria to support the proposed activity in the college's CLNAs?**

    Perkins funds are used to address gaps and needs identified by data at the program level in their CLNAs.

7. **Has the college reviewed their CLNAs with an equity lens to improve participation, persistence, and completion of special populations and underserved students?**

    How are activities planned to address equity and special populations?

Local Plan and Budget Modifications

A modification is required if the college desires to modify the approved local plan and/or budget by more than 10 percent of the total budget or specific Voc Code allotment. There must be a clear linkage between the modification request and the CLNA(s). Colleges should not expend funds according to the modified budget until their request has been authorized. Early submission of a modification to the plan and budget is necessary to ensure that funds are spent early enough in the academic year to impact student learning and associated indicator results. The deadline to submit a budget modification is in mid-May of each year-- look at the timeline at the front of this handbook for exact deadline. See Appendix D for specific instructions on using the modification template.

Note: Modifications are required when a Voc. Code / line-item expenditure exceeds 10 percent or there is a significant change in the local plan.   Equipment purchases must be approved in advance by submitting the revised Local Plan and detailing the equipment to be purchased using the equipment tab.

Budget modifications must adhere to the following:

1. **Relation to cost principles**. The cost principal requirements of EDGAR 2 CFR Part 200 Sub-part E apply.

2. **Local Plan**. When a budget modification is made, two items must be submitted in the Moodle:
    a. A **Budget Modification form**, signed by the CFO (generally scanned/uploaded as a PDF)
    b. the college's **Local Plan** (Excel workbook with four tabs), updated to reflect the changes.

3. **Budget changes**. Colleges shall obtain the prior approval from their program coordinator whenever any of the following changes is anticipated under Perkins grant award:

    a. any revision which would result in the need for additional funding

    b. unless waived by the awarding agency, cumulative transfers among direct cost categories, or, if applicable, among separately budgeted programs, projects, functions, or activities that exceed or are expected to exceed 10 percent of the current total approved budget, or funding in a subcategory is insufficient, and **shall be accompanied by a narrative justification and CLNA reference for the proposed revision**.

4. **Programmatic changes**. Revision of the scope or objectives of the program requires prior approval.

5. **Final budget modifications** for the current fiscal year must be submitted no later than May 17. ***Contact your CTE Coordinator if you need to request modifications past this date.***

Additional NCCCS Spending Guidance

In addition to the statutory requirements, the NCCCS has the following additional recommendations:

1. In general, funds should be spread across programs and activities, such as salaries, equipment, work-based learning and professional development within the guidance of the college's CLNAs.

2. FACULTY
   Generally, a college should not use Perkins funds to support the same faculty position for more than three years, as the program becomes self-supporting at this time through FTE.

3. NON-FACULTY POSITIONS
   Perkins may be used to pay for non-faculty (non-FTE generating) positions as long as there is a gap in their CLNA(s) that this position addresses. For example, Work-based Learning Coordinators, Career Coaches, and Program Navigators.

4. EXTRA DUTY PAY must be calculated on the institutional base salary for each unique contract, therefore, not everyone performing the same activity will be paid the same. §200.430(h)(2)

5. MINI-GRANTS
   If the college implements a mini-grant system, they must insure that the mini-grant addresses a gap or need identified in the college's CLNA(s).

6. STUDENT CREDENTIALS
   Perkins may be used to pay for student credentials if the following criteria are met:

   a. Industry has asked for students with this credential or training that this credential meets,
   b. The credential addresses a need identified in the college's CLNA, and
   c. That the college only pays for a student once. For example, if the student fails, then Perkins may not be used to pay for additional attempts at certification or for a renewal if their certification has expired.

7. FACULTY CREDENTIALS 135(2)(c) Perkins may be used to pay for faculty credentials if the CLNA identifies the credential is needed.

   STUDENT Out-Of-Pocket expenses. See Perkins Section 135(b)(5)(S). Note that if these expenses can be paid for by another funding source at the college or by a community partner without undue burden, it will be expected that colleges will leverage the other funding sources first. (Example: a college should first tap its state-funded Child Care Grant and refer students to the county department of social services (Subsidized Child Care Program) before paying child care expenses for CTE students.) Contact your CTE coordinator if the college wants its Perkins funds to pay for short-term stop-gap funding while other sources are being pursued.

8. Career and Technical Student Organizations (CTSOs)

Perkins V §135(b)(5)(O) says that Perkins funds may be used to support "career and technical student organizations, including student preparation for and participation in technical skills competitions aligned with career and technical education program standards and curricula"

NCCCS has accepted the National Coordinating Council (NCC) criteria for CTSOs to be recognized and has added additional criteria for those CTSOs that may be funded using Perkins V grants by NC Community Colleges. According to the NCC website, there are currently 8 CTSOs that meet their criteria. Of those, the following five may be funded using Perkins V funds at an NC Community College:

1) **DECA** – for marketing students
2) Future Business Leaders of America-**Phi Beta Lambda** (FBLA-PBL)
3) **HOSA** – Future Health Professionals
4) National **FFA** Organization for agriculture students
5) **SkillsUSA**

NCC has established criteria for CTSOs to be recognized, and NCCCS has accepted this criterion and added additional criteria for those CTSOs that may be funded using Perkins V grants by NC Community Colleges. The following criteria must be met:

Is a CTSO whose mission and statement of purpose include:

a. Offer programs that are integral to the industry or occupational focus that may be associated with a career pathways program, program of study, or course.

b. Serve CTE students and teachers in one or more of the 16 Career Clusters identified in The National Career Clusters Framework. (In NC, this would be in one of the program areas that has a code that begins with 15, 20, 25, 30, 35, 40, 45, 50, 55, and 60.)

c. Offer programs that include employability skill and leadership activities and training.

Is a CTSO whose governance reflects their commitment to CTE by:

a. Incorporation as a 501(c)(3) not-for-profit corporation in the United States.

b. Organizing themselves into state geographic units.

c. Having substantial representation on their board of directors from CTE educators and/or administrators.

Has sufficient engagement by CTE students, educators, employers and state departments of education to be considered national in scope:

a. 20,000 or more student member organized into chapters in middle, secondary, and/or postsecondary institutions (*with a formalized process for election/selection of student leaders/officers at the local, state and national levels and a structured program of work*)

b. 1,000 or more middle, secondary and/or postsecondary chapters.

c. Fifteen (15) or more state associations recognized by their state/territorial education agency as integral to their state's CTE instructional program/curriculum. The state/territorial level advisor/leader must be recognized and approved by the state/territorial education agency as an employee and/or contracted for services.

d. Have an identified, participating, and employed National Executive Director or equivalent.

e. Have a minimum of 10 career and/or leadership development activities or competitions.

See http://www.ctsos.org/wp-content/uploads/2019/03/2016-Final-Definition-NCC-CTS-JULY-16.pdf

Additionally, the ACTE website has links to each of these CTSOs and more, see this link for the NCC members https://www.acteonline.org/career-and-technical-student-organizations-make-cte-work/

CTSO Expenditures

Allowed	Not Allowed
• Travel for both students and faculty • Room and Board at competitions • Student membership if the student is in a special population as a last resort (college must document) • Closet of uniforms, equipment may be purchased to support special populations. See Appendix C for US DOE guidance. *	• Individual uniform items (blazers and slacks) * • Consumable supplies (welding rods, lumber, electrical wiring, etc.)

* Contact your NCCCS CTE Coordinator if you have any questions.

Fiscal Grant Management

Overview

Each recipient of Perkins funds must follow cost guidelines outlined in the Office of Management and Budget (OMB) publication of the final Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (known as the Uniform Grants Guidance), the Perkins Act, and EDGAR. These publications discuss how to determine if an expense is reasonable and allocable and includes specific unallowable expense categories. Note that the state of North Carolina may set more stringent standards. These documents provide an explanation of the required documentation when salaries and personnel costs are paid with federal funds. **See Basic Cost Guidance/Principles** for details of allowable and unallowable costs. *(Ref: 2 CFR, Subpart E – "General Provisions for Selected Items of Cost" starting with Section 420)*

Supplementing Versus Supplanting

In accordance with Perkins V, Title II, Part A, Section 211(a), funds made available under the Act must supplement and not supplant non-federal funds expended to carry out CTE activities. In other words, federal Perkins funds are to be used to enhance career and technical education programs and activities and cannot be used when non-Perkins funds are available or have previously supported these CTE programs or activities.

1. It will be presumed that supplanting has occurred where:

    a. Colleges use Perkins funds to provide services that the college is required to make available under another federal, state, or local law; or

    b. Colleges use Perkins funds to provide services that the college provided with non-Perkins funds in the prior year

    c. Colleges provide services for non-CTE programs with non-federal funds and provides the same services to CTE programs using Perkins funds.

2. NCCCS provides technical assistance and training on supplanting as needed. Colleges with questions or concerns regarding supplanting or any other Perkins matters, should contact their assigned program coordinator. (See Appendix B for USDOJ Supplanting guidance)

Compliance with EDGAR

Mandatory Disclosures

The college or applicant for a federal award must disclose, in a timely manner, in writing to the Federal awarding agency or pass-through entity, all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Federal award. Failure to make required disclosures can result in any of the remedies described in section 2 CFR, §200.339 Remedies for noncompliance, including suspension or debarment.

Debarred and Suspended Parties

Grantees and sub-grantees must not make any award or permit any award (sub-grant or contract) at any tier to any party that is debarred or suspended or is otherwise excluded from or ineligible for participation in Federal assistance programs under 13 CFR §400.109, Government-wide debarment and suspension. Equipment monitoring may include reviewing purchases and evidence that the federal System for Award Management (SAM) database was checked to ensure vendor was not debarred or suspended. (Ref: 2 CFR Part 180 and Part 200, §200.213-214)

Construction projects.

Capital Improvements using Perkins funding is typically unauthorized. Renovation to an existing structure for the installation of CTE training equipment may be permitted and requires written prior approval from the State Postsecondary CTE Director.

Program Income

In accordance with the Uniform Administrative Requirements 2 CFR Part 200, §200.307. All program income consideration must meet the following requirements:

1. Colleges are encouraged to earn income to defray program costs where appropriate. Income realized from Perkins programs must be rolled back into the program from which it was earned, and not the college's general fund.

2. Program income includes income from fees for services performed, from the use or rental of real or personal property acquired with grant funds, from the sale of commodities or items fabricated in the CTE program.

3. Program income does not include interest on grant funds, rebates, credits, discounts, refunds, etc. and interest earned on any of them. Taxes, special assessments, levies, fines, and other such revenues raised by a college are not program income.

4. There are no Federal requirements governing the disposition of program income earned after the end of the award period (i.e., until the ending date of the final financial report), unless the terms of the agreement or the Federal agency regulations provide otherwise.

5. Live work procedures must be adhered to in support of program income.

6. Accurate accounting of revenue, supplies, material, etc. must be maintained.

Basic Cost Guidance/Principles

Factors Affecting Allowability of Costs **(**Ref: 2 CFR Part 200, § 200.403)

All costs must be:

1. Necessary and reasonable and allocable

2. Conform with federal law and grant terms

3. Consistent with state and local policies

4. Consistently treated

5. In accordance with Generally Accepted Accounting Principles (GAAP)

6. Not included as a match

7. Adequately documented

Direct Costs (Ref 2 CFR Part 200, § 200.413)

Direct costs are those costs that can be identified specifically with a particular final cost objective, such as a Federal award, or other internally or externally funded activity or that can be directly assigned to such activities relatively easily with a high degree of accuracy.

Direct costs generally include:

- Salaries and wages (including vacations, holidays, sick leave, and other excused absences of employees working specifically on objectives of a grant or contract – i.e, direct labor costs).

- Other employee fringe benefits allocable on direct-labor employees.

- Consultant services contracted to accomplish specific grant/contract objectives.

- Travel of employees.

- Materials, supplies, and equipment purchased directly for use on a specific grant or contract.

Employees

The salaries of administrative and clerical staff should normally be treated as indirect costs. Direct charging of these costs may be appropriate only if all of the following conditions are met:

- Administrative or clerical services are integral to a project or activity

- Individuals involved can be specifically identified with the project or activity

- Such costs are explicitly included in the budget or have the prior written approval of your Program Coordinator

- The costs are not also recovered as indirect costs

Reasonable Costs (Ref 2 CFR Part 200, § 200.404)

Consideration must be given to:

- Whether cost is a type generally recognized as ordinary and necessary for the operation of the college or the proper and efficient performance of the Federal award

- The restraints or requirements imposed by such factors as Federal, state, local, tribal and other laws and regulations and terms and conditions

- Market prices for comparable goods and services in the geographic area

- Whether the individuals acted with prudence under the circumstances considering their responsibility

- No significant deviation from established prices

Practical questions

- Does it help fill a gap identified by the CLNA?

- Do I really need this?

- Is the expense targeted to a valid programmatic/administrative need?

- Is this the minimum amount I need to spend to meet my need?

- Do I have the capacity to use what I am purchasing?

- Did I pay a fair rate?

- If I were asked to defend this purchase, would I be able to?

Allocable Costs (Ref 2 CFR Part 200, § 200.405)

A cost is allocable to a Federal award or cost objective if the goods or services involved are chargeable or assignable in accordance with relative benefits received.

Can only charge in proportion to the value received by the program.

For example – A college purchases a subscription to a course review process to evaluate all courses at the institution. The courses at the college are 80 percent CTE-related and 20 percent college transfer. The college may fund only 80 percent of the subscription with Perkins funds.

> Any questions about potential conflicts should be addressed to a NCCCS CTE Coordinator

Non-Allowable Expenditures

Funds typically cannot be used to purchase the following. Contact your Program Coordinator for additional clarification.

• Advertising	• Food or beverages
• Alcohol	• Fundraising
• Audits except single audit	• Furniture
• Awards and memorabilia	• Giveaways
• Contingencies	• General administration apart from program administration
• Contributions and donations	
• Entertainment	• Individual employee memberships
• Expenses that supplant	• Memberships or anything related to lobbying
• Facilities	• Student expenses or direct assistance to students (except for specific special populations)
• Fines and penalties	
• Firearms*	• Perkins cannot be used as matching funds for other grants

* Approval may be granted by the State postsecondary CTE Director for firearms required by the NC Criminal Justice Education and Training Standards Commission for use in Basic Law Enforcement Training (BLET) courses, if the college is approved by the Commission to offer BLET and if the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) paperwork is complete.

Specific Cost Guidance by Category

The Code of Federal Regulations (CFR) contains specific cost guidance by category in ***Ref: 2 CFR Part 200, §200.420 – §200.476.***   These principles apply whether a cost is treated as direct or indirect. Failure to mention a particular item of cost in these sections of the CFR is not intended to imply that it is either allowable or non-unallowable; rather, determination of allowability in each case will be based on the treatment or standards provided for similar or related items of cost.

Ref: 2 CFR Part 200, §200.420*,* "In case of a discrepancy between the provisions of a specific Federal award and the provisions below, the Federal award governs. Criteria outlined in *§200.403 Factors Affecting Allowability of Costs* must be applied in determining allowability. See also §200.102."
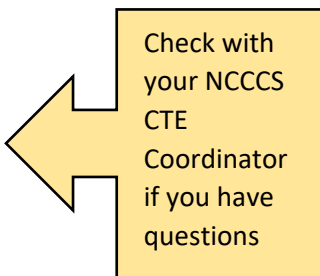
Timely Obligation of Funds

Colleges must make a concerted effort to obligate Perkins funds in a timely manner throughout the fiscal year. Priority must be made to obligate funding in a programmatic response towards improving the college's performance for core indicators, especially in the performance areas that are reported below the targeted levels. (EDGAR Section 309)

1. Colleges may begin to obligate funds in accordance with their plan and budget once notified by their program coordinator that their plan and budget have been approved.

2. Every effort should be made to expend grant funds specifically for capital and non-capital purchases in the **first two quarters of the fiscal year**. This is critical to the efficient and effective use of the grant and to maximize the impact of the funds on student performance throughout reporting year.

3. Modifications to the basic budget may be submitted throughout the fiscal year but no later than May 17th. Attention must be paid to timing of budget amendments to ensure enough time for the planning and approval process. Colleges must provide adequate time to process the request, gain approval from their program coordinator, implement the change, obligate, and expend the funds, and prepare to close out the grant for the year.

4. All equipment purchased using Perkins funding must be **in place and in use**, no later than June 30th of the fiscal year.

** If a college is starting a **new program** in the summer or fall, and it has been approved by the NC State Board of Community Colleges, then Perkins funds may be used to purchase equipment in advance to the program starting. While next year's funding can still be used to purchase the equipment prior to the start of classes, in order to use the funds in the current year for a program starting in the summer or fall the program must have an approved CLNA and these items must be purchased, received, and paid for in the current budget year. If delivery of the equipment is delayed and caused to be paid for in the next year, then the next year's funds will have to cover the purchase. Note that Perkins funds may not be used as the primary source for new program equipment, but to supplement the college's funding to start the new program.

> Check with your NCCCS CTE Coordinator if you have questions

Required Certifications

To assure that expenditures are proper and in accordance with the terms and conditions of the Federal award and approved project budgets, the annual and final fiscal reports or vouchers requesting payment under the agreements must include a certification, signed by an official who is authorized to legally bind the College, which reads as follows*: "By signing this report, I certify to the best of my knowledge and belief that the report is true, complete, and accurate, and the expenditures, disbursements and cash receipts are for the purposes and objectives set forth in the terms and conditions of the Federal award. I am aware that any false, fictitious, or fraudulent information, or the omission of any material fact, may subject me to criminal, civil or administrative penalties for fraud, false statements, false claims or otherwise. (U.S. Code Title 18, Section 1001 and Title 31, Sections 3729-3730 and 3801-3812)."* When budget documents are submitted to www.ncperkins.org, the individual submitting the documentation will be required to acknowledge this statement. *Ref: 2 CFR Part 200, §200.415.*

Carryover Procedures

Every effort should be made to completely expend all awarded grant funds each year in an efficient and effective manner. Unused portions of college grant funds will not be allowed for reimbursements. Carryover funds will be returned to the NCCCS. When applicable, these carryover funds will be included in the overall Perkins allocations to all colleges for the following year.

Procurement Standards & Property Management

General Procurement Standards (Ref: 2 CFR Part 200, §200.318)

All colleges will follow §200.318 General procurement standards through §200.326 - Contract provisions.

Equipment (REF: 2 CFR Part 200 §200.313)

Use

1. Equipment must be used by the college in the program or project for which it was acquired as long as needed, whether or not the project or program continues to be supported by the Federal award, and the college must not encumber the property without prior approval of NCCCS. When no longer needed for the original program or project, the equipment may be used in other activities supported by the Federal awarding agency, in the following order of priority:

   a. Activities under a Federal award from the Federal awarding agency which funded the original program or Perkins project, then

   b. Activities under Federal awards from other Federal awarding agencies. This includes consolidated equipment for information technology systems.

2. During the time that equipment is used on the project or program for which it was acquired, the college must also make equipment available for use on other projects or programs currently or previously supported by the Federal Government, provided that such use will not interfere with the work on the projects or program for which it was originally acquired. First preference for other use must be given to other programs or projects supported by Federal awarding agency that financed the equipment and second preference must be given to programs or projects under Federal awards from other Federal awarding agencies. Use for non-federally funded programs or projects is also permissible. User fees should be considered if appropriate.

3. When acquiring replacement equipment, the college may use the equipment to be replaced as a trade-in or sell the property and use the proceeds to offset the cost of the replacement property.

Management

Procedures for managing equipment (including replacement equipment), whether acquired in whole or in part under a Federal award, until disposition takes place will, as a minimum, meet the following requirements:

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, 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.

   a. All items susceptible to pilferage purchased with Perkins funds must be inventoried and visibly tagged (or alternate method of identification) before being placed into service.

   b. At a minimum, tags will identify the item as purchased with Perkins funds and include an inventory number that corresponds with property records.

c. Property records must include a description of the property, a serial number or other identification number, the source of property, who holds title, the acquisition date, and cost of the property, percentage of federal participation in the cost of the property, the location, use and condition of the property and any ultimate disposition data including the date of disposal or sale price of the property.

2. A physical inventory of the property must be taken, and the results reconciled with the property records at least annually.

3. A control system must be developed to ensure adequate safeguards to prevent loss, damage, or theft of the property. Any loss, damage, or theft must be investigated.

4. Adequate maintenance procedures must be developed to keep the property in good condition.

5. If the college is authorized or required to sell the property, proper sales procedures must be established to ensure the highest possible return. Consult the Director of CTE at NCCCS prior to selling.

6. Lost, Damaged, or Stolen Items - Colleges must take reasonable precautions to ensure that items purchased with Perkins funding are properly maintained, accounted for, and protected from damage, loss, unreasonable deterioration and theft. Colleges are advised to implement the following controls, and any additional controls felt to be necessary to safeguard the property:

    a. Maintain adequate and current property records that allow the items to be located, and maintain records of the person or persons who have property in their possession or are responsible for their security during non-duty hours. Accountability and responsibility must always be maintained, whether the property is located on-site or off-site.

    b. Provide a secure building and coordinate between the security function and the Property Control Officer, especially regarding security violations or changes affecting official property.

    c. Have a written policy and always follow it when checking out property that requires employees to sign for property in their possession.

When property acquired with Perkins funds is lost, damaged or stolen the college must conduct and fully document an investigation. When appropriate, law enforcement authorities should be notified, a police report should be filed and maintained for records, and if the item meets the state's capitalization threshold, insurance provider should be notified.

Disposition

When original or replacement equipment acquired under a federal award is no longer needed for the original project or program or for other activities currently or previously supported by a Federal awarding agency, except as otherwise provided in Federal statutes, regulations, or Federal awarding agency disposition instructions, the college must request disposition instructions from NCCCS. Disposition of the equipment will be made as follows, in accordance with Federal awarding agency disposition instructions:

1. Items of equipment with a current-per-unit-fair-market value of $5,000 or less may be retained, sold or otherwise disposed of with no further obligation to the Federal awarding agency.

2. Except as provided in §200.312 Federally owned and exempt property, paragraph (b), or if the Federal awarding agency fails to provide requested disposition instructions within 120 days, items of equipment with a current per-unit-fair-market value in excess of $5,000 may be retained by the college or sold. The Federal awarding agency is entitled to an amount calculated by multiplying the current market value or proceeds from sale by the Federal awarding agency's percentage of participation in the cost of the original purchase. If the equipment is sold, the Federal awarding agency may permit the college to deduct and retain from the Federal share $500 or 10 percent of the proceeds, whichever is less, for its selling and handling expenses.

3. The college may transfer title of the property to the Federal Government or to an eligible third party provided that, in such cases, the college must be entitled to compensation for its attributable percentage of the current fair market value of the property.

4. In cases where a college fails to take appropriate disposition actions, the Federal awarding agency may direct the college to take disposition actions.

Employee Time and Effort

1. Time and effort reporting guidelines are specified in **2 CFR Part 200 §200.430**. All employees, including instructors, administrators, and other staff who are paid with federal funds are required to document the time and effort they spend within that program. The portion of the federally paid wages should be reflective of the time and effort the individual has put forth for that federal program. Charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed. These records must:

   a. Be supported by a system of internal control that provides reasonable assurance that the charges are accurate, allowable, and properly allocated.

   b. Be incorporated into the official records of the organization.

2. Employees compensated using Perkins funds are required to maintain auditable time-and-effort documentation that shows how each employee spent his or her compensated time. Such documentation is written, after-the-fact documenting how the time was actually spent (not estimated or budgeted). There are sample forms in Appendix E and on NCPerkins.org. There are three types of time and effort certification reports:

   a. **Semi-annual certifications are required for personnel whose compensation is funded solely from the Perkins grant.** These certifications document that the person has been working solely in activities supported by the Perkins grant. Some colleges may require monthly reports for these personnel. Every six months is only the minimum. The certification must (1) cover a semi-annual period of time, (2) identify Perkins as the program, and (3) be signed and dated by an employee and supervisor having first-hand knowledge of the work performed by the employee.

   b. **Semi-annual certifications are required for personnel whose time is spent solely on Perkins Act allowable activities but is paid in part from Perkins and in part from other sources.** Some colleges (grant colleges) may require monthly reports for these personnel. Every six months is only the minimum. The certification must (1) cover a semi-annual period of time, (2) identify activities that

are allowable under the Perkins Act, (3) identify all funding sources, and (4) be signed and dated by an employee and supervisor having first-hand knowledge of the work performed by the employee.

c. **Monthly certifications are required for personnel whose time is split between Perkins allowable activities and non-allowable activities and is charged in part to Perkins and in part to other sources (split-funded staff).** These reports document the portions of time and effort dedicated to Perkins and to other revenue sources. Such records must (1) be completed after-the-fact, (2) account for the total time for which the employee is compensated, (3) be prepared at least monthly and coincide with one pay period, and (4) be signed by the employee and by an administrator or supervisor.If there are differences in the amount of time that an individual is reporting and what is actually being paid, adjustments must be made in the payroll to accurately reflect the time and effort spent on Perkins activities.

d. **Time and Effort Guidance for split-time employees with direct services to students**

If the employees work with both AA/AS and AAS students, the position is considered split. Employees who fall into this category must complete the split time and effort form and record both AAS and AA/AS hours on a weekly basis. The form must be submitted monthly and signed by the employee and their supervisor.

Documentation of effort should include:
- Student's program of study
- Subject area
- Time spent for each session

Documentation should be collected monthly and be included with the time and effort form.

Supervisors should reconcile the hours worked with the documentation provided to ensure the hours reported match.

*** Do not include student personal identifying information (PII) in any reports submitted to NCCCS.

Basic Grant Monitoring

General Information

NCCCS conducts ongoing monitoring to ensure the Perkins programs at the colleges are administered correctly and in compliance with federal and state requirements. Technical assistance will be provided where requested or required. NCCCS performs "desktop" and on-site monitoring for the colleges receiving Perkins grant funds based on risk or noncompliance with Federal statues, regulations, and the terms and conditions of the subaward of the Perkins Act.

NOTE: Additional monitoring requirements may be indicated due to updates or changes to federal monitoring and reporting requirements. Colleges will be notified of these updates in a timely manner to facilitate accurate monitoring.

Selection of Colleges

Annually, colleges are ranked by risk using a scoring rubric developed by the NCCCS Career and Technical Education (CTE) staff. Colleges considered to be the most at-risk are chosen for on-site monitoring.

Risk Factors

- Meeting attendance (at required meetings, identified by a blue star in NCPerkins.org)
- New Perkins Coordinator (less than 1 year)
- Number of employees paid by Perkins
- Missing Perkins contacts/key roles listed in the Moodle
- Large Grants (more than $500,000)
- Missing documents or chronically late submission of documents in NCPerkins.org
- Have not been monitored in 5 years

On-Site Monitoring

Perkins V places emphasis on subrecipients conducting a comprehensive local needs assessment and writing local application and plan to address gaps in program performance while enhancing pathways, aligning programs of study, addressing all required activities, and providing faculty professional development with accountability measures. As colleges continue the implementation of Perkins V, the NCCCS Perkins team will monitor in the spirit of the new legislation with emphasis on "discovery with technical assistance."

Monitoring begins with a Perkins update and general survey of the college's stakeholders, the chief academic officers, local Perkins contacts and CTE deans, faculty, and staff. Following these meetings, our monitoring teams will visit the colleges virtually or in-person for a review of the CLNA and conduct faculty and staff interviews.

Postsecondary site monitoring centers around Carl D. Perkins V, Section 134 (C)(1) and EDGAR 200.332(d). The monitoring will seek to determine how the college is making a difference in student achievement by addressing key elements in the Comprehensive Local Needs Assessment (CLNA). The monitoring will review the areas of student performance; CTE program size, scope, and quality; progress in implementing and enhancing program of study; and career pathways with high-skill, high-wage or in-demand occupations aligned to the labor market;

faculty professional development including recruitment, retention, and placement; and equal access to high quality CTE program of study for all students.

Interviews with faculty and staff will be conducted to determine activities and strategies the college has implemented with the use of Perkins and local college funds to assist faculty in developing new skills and credentials to enhance Career and Technical Education at the college.   Interviews will take place with deans or vice presidents to learn of progress in working with high schools to outline and implement career pathways that are documented on a variety of matrices. Finally, interviews with the Perkins coordinator or institutional effectiveness officer will be conducted to better understand the college's annual negotiated levels of performance around (1P1) Students placed in employment or further instruction; (2P1) Students earning a postsecondary credential and (3P1) Students participating in a program of study that is non-traditional for their gender.

A letter of findings from the NCCCS will be forwarded to the president of the college within 30 days of the monitoring visit. This report will document the specific findings and will inform the president if any corrective actions are required, and the date due, if applicable. Areas that are found to be commendable or identified as "best practices" will also be included in the documentation forwarded to the president. This will be an opportunity for open dialogue between the college and the state monitoring team, to ask questions and obtain specific training and professional development needed by the college for Perkins performance improvement.

Desk Monitoring

Desk monitoring is based on areas identified by national trends as high risk. These currently include time and effort records for employees and the purchase of equipment. **Equipment Monitoring** will be conducted with colleges spending in excess of 65 percent of their basic grant on equipment. **Time and Effort Monitoring** will be conducted with colleges using Perkins funds to hire staff with split time and effort, indicating the individual was funded with both state and federal funds and were responsible for CTE and non-CTE activities in their job.

Each college identified for monitoring will be sent a letter requesting a budget report (XDBR) and documentation on employee time and effort certification and/or equipment purchases. A phone conversation will take place with the state Perkins Team to review Perkins activities and the documentation that was submitted.

Appendix A Special Populations Definitions, Data Collection Sources

Perkins V Definition	Data collection source and definition if different
Individuals with disabilities Perkins V §3(28)(A) An individual with any disability as defined in section 3 of the Americans with Disabilities Act of 1990 (42 U.S.C. 12102	Qualified students are identified by the college's Disability Services Office in Colleague CFNC profile nonrequired field asks for Disability/Handicap and includes options of Blind, Deaf, Physical handicapped, Learning disability
Individuals from economically disadvantaged families, including low-income youth and adults	Not on CFNC. Perkins uses CTE curriculum student (concentrator) who is a PELL recipient
Individuals preparing for non-traditional fields Perkins V §3(33) The term 'non-traditional fields' means occupations or fields of work, such as careers in computer science, technology, and other current and emerging high skill occupations, for which individuals from one gender comprise less than 25 percent of the individuals employed in each such occupation or field of work.	CFNC required field on application is male or female. No Use the NAPE nontraditional crosswalk of fields to determine which programs are included. Students of the nontraditional gender who are enrolled in these programs meet this population See https://cte.ed.gov/accountability/linking-data
Single parents, including single pregnant women	Not on CFNC. Perkins uses self-identification if colleges ask students and enter it in colleague

Out-of-workforce individuals
 	
Perkins V §3(36)
A) An individual who is a displaced homemaker, as defined in section 3 of WIOA (29 U.S.C. 3102); or
B) And individual who –
  (i) (I) has worked primarily without remuneration to care for a home and family, and for that reason has diminished marketable skills; or,
    (II) is a parent whose youngest dependent child will become ineligible to receive assistance under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.) not later than 2 years after the date on which the parent applies for assistance under such title; and
  (ii) Is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment.
	Not on CFNC

English learners
Perkins V §3(22)(B) an adult or an out-of-school youth who has limited ability in speaking, reading, writing, or understanding the English language and –
  i.   Whose native language is a language other than English; or
  ii. Who lives in a family environment or community in which a language other than English is the dominant language.
	CFNC nonrequired field asks what is your primary language. CFNC does not ask if they are an English Learner

Homeless individuals described in section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a)
 	
Section 725(2)(A) The term "homeless children and youths"
  (A) Means individuals who lack a fixed, regular, and adequate nighttime residence (within the meaning of section 11302(a)(1) of this title); and
  (B) Includes – [see list of 4 examples of homelessness]
	CFNC asks Are you a homeless individual? If you click the ? it says "An individual who lacks a permanent place to live (i.e. shelter or temporary housing facility) or lives in a location that is not typically used as a residence (i.e. bus station, campground, car, or park)."

Youth who are in, or have aged out of, the **foster care** system	CFNC application required field asks "are you a youth in foster care/aged out of foster care?" Options are yes, no, choose not to respond. If you click the ? it says "An individual who is currently in foster care or has aged out of the foster care system at age 18."

Youth with a parent who –
  i.   Is a **member of the armed forces** (as such term is defined in section 101(a)(4) of title 10, U.S.C.); and
  ii. **Is on active duty** (as such term is defined in section 101(d)(1) of such title)
 	
10 U.S.C. Section 101(a)(4) includes only Army, Navy, Air Force, Marine Corps, and Coast Guard
 	
10 U.S.C. Section 101(d)(1) Full-time duty in the active military service of the United States. Such term includes full-time training duty, annual training duty, and attendance, while in the active military service, at a school designated as a service school by law or by the Secretary of the military department concerned. Such term does not include full-time National Guard duty.
	CFNC application required field asks "Are you active duty miliary or a military dependent?" Options are Active Duty Military, Military Dependent, Neither

Students from major racial and ethnic groups	CFNC application nonrequired field asks if Hispanic or Latino, or Not Hispanic or Latino If you click the ? it says "Hispanic/Latino: Mexican, Puerto Rican, Cuban, Central or South American or other Spanish origin or culture, regardless of race" CFNC application nonrequired field offers a selection of American Indian or Alaska Native, Asian, Black or African American, Native Hawaiian or Other Pacific Islander, or White, and allows the selection of more than one

Appendix B Supplanting Guidance

1. From the US Department of Justice, Office of Justice Programs

   https://www.ojp.gov/tfsc/supplanting_guide_sheet_508

2. From the NC Department of Public Instruction, General Fiscal Guidance (March 11, 2019), pages 17-18

   https://www.dpi.nc.gov/districts-schools/district-operations/financial-and-business-services/federal-fiscal-oversight-and-compliance/fiscal-guidance

Department of Justice (DOJ) grants are administered for the purpose of **supplementing** existing state or locally funded activities. Federal awards must never **supplant** funds for activities that were previously covered by the state and local funds. Supplanting and supplementing are two different terms that can easily be confused. This guide sheet will focus on supplanting as it is important for grantees to comprehend how supplanting can negatively impact their project.

Supplanting occurs when a state or unit of local government reduces state or local funds for an activity, specifically because federal funds are available (or expected to be available) to fund that same activity. This is prohibited under DOJ grants.

Supplementing occurs when federal funds are used to enhance existing state or local funds for program activities.

Grant Financial Management Requirement

Unless permitted by statute, DOJ states that award funds cannot be used to supplant state, local, or tribal funds. In other words, federal funds are not permitted to be used to **take the place of or replace** the state and local funds used to offer those programs and services. Therefore, federal funds must be **only** used to supplement existing state, local, or tribal funds for program activities.

Important Information to Know

Always remember, federal funds must be used to **supplement** existing state, local, or tribal funds and not **supplant** (replace) them. Scenario A shows an example of supplanting, which is not allowed.

Scenario A: Supplanting
Organization X was awarded federal funding to purchase four vehicles outlined in one of their target areas. Organization X adjusted its local budget (originally allocated to pay for vehicles) and shifted local funding, which it budgeted to purchase the four vehicles, to other target area purposes.

Scenario A is supplanting because Organization X had already budgeted local funds to purchase the four vehicles and decided to replace local funds with federal funds.

In instances where a question of supplanting arises, the grantee will be required to substantiate that the reduction in non-federal resources occurred for reasons other than the receipt or expected receipt of federal funds. Grantees may be required to submit documentation showing that supplanting did not occur. If DOJ discovers supplanting, grants could be suspended or terminated and grantees could be barred from receiving current and future federal funding. Grantees may also have to repay the misused funds.

How This Applies to Your Grant

Grantees that fully understand the difference between supplementing and supplanting can ensure that their grants run smoothly and can avoid potential consequences from DOJ. To avoid supplanting from occurring, grantees should:

- ▶ Ensure that all staff understand the difference between supplementing and supplanting.

- ▶ Separately store files for each grant, with individual accounting tracking systems or spreadsheets. Funds should not be lumped into one category labeled "grants." However, if the funds are allocated for the grant, they should be labeled accordingly.

- ▶ Ensure that budget categories (personnel, equipment, supplies, etc.) are set up for each grant award.

- ▶ Ensure that all expenses and reimbursements are consistently tracked for accuracy.

- ▶ Never use federal funds to pay for existing employees, unless the existing position is "back-filled" with a new hire.

- ▶ Never use federal funds to pay for items or costs that the grantee is already obligated to pay with state, local, or tribal funds.

- ▶ Always have supporting documentation. This may include budget sheets, meeting minutes, agency memoranda, notices or orders, and any other official documents addressing the reduction in non-federal resources.

When in doubt, grantees should review the Notification of Funding Availability (NOFA) to check if it states that supplanting is prohibited. In addition, if a grantee is unsure about supplanting, they should contact their assigned grant officer to discuss the scenario and ensure that supplanting doesn't occur.

Resources

DOJ Financial Management Training. https://www.ojp. gov/training/financial-management-training

Office of Justice Programs. (2020). *Grants 101: Definitions.* https://www.ojp.gov/funding/grants101/ definitions

About the OJP Territories Financial Support Center

The Office of Justice Programs Territories Financial Support Center (OJP TFSC) offers free resources, training, and technical assistance for grantees in the U.S. territories. OJP TFSC services focus on building financial management capacity and can be accessed by emailing OJPTFSC@usdoj.gov via our Virtual Support Center.

OJP ◆TFSC

NC DPI General Fiscal Guidance, pages 17-18

Supplement Not Supplant Requirement

Under the Federal "supplement, not supplant" requirement, non-Federal entities may use Federal funds only to supplement and, to the extent practical, increase the level of funds that would, in the absence of the Federal funds, be made available from non-Federal sources for the education of participating students. In no case may non-Federal entities use Federal program funds to supplant (take the place of) funds from non-Federal sources.

Supplanting is presumed to occur in the following instances:

The non-Federal entity uses Federal funds to provide services that it is required to make available under other Federal, state or local laws.

The non-Federal entity uses Federal funds to provide services that were provided with non-Federal funds in the prior year.

These presumptions are rebuttable if the non-Federal entity can demonstrate that it would not have provided the services in question with non-Federal funds had the Federal funds not been available. For example, a non-Federal entity in the past year had used state or local funds to pay the salaries of certain personnel. The non-Federal entity then experiences significant loss of revenue. In the next year that non- Federal entity may be able to demonstrate that the use of current year Federal program funds to pay for the salary costs would not be supplanting because, without the Federal funds, it would not have the resources needed to maintain these positions. This exception can also be used where the services are mandated by state law, but the state provides no funds for it.

When using this rebuttable exception, it is very important that the non-Federal entity maintains good fiscal records and documentation from their Management (School Board, Board of Directors, Authorized Representatives, etc.) that will permit an auditor or program monitor to conclude that they have not supplanted.

In particular, a non-Federal entity that believes it could not maintain services previously paid with state or local funds had Federal program funds not been available should:

Be able to demonstrate a decrease of state and local funds from the prior year, and the maintenance or increase in standard operating costs (salaries, benefits, supplies, etc.) from the prior year; -OR-

Be able to demonstrate that any increase in state and local funds is less than increases of the standard operating costs, and state/local funds have not been redirected to a new activity; -AND-

Be able to demonstrate that Management is on record as deciding to eliminate the activity under question unless a new source of funds is made available from non-state and non-local funds (in the absence of state and local funds), and the activities to be funded under a particular Federal program are clearly consistent with the purpose of that program.

For US Department of Education Federal Programs that have supplement, not supplant requirement (Restricted Rate Programs), please refer to US Department of Education
https://www2.ed.gov/about/offices/list/ocfo/restrate.html

Appendix C US DOE CTSO Expenditure Guidance

From: Figueroa, Jose <Jose.Figueroa@ed.gov>
Sent: Tuesday, March 7, 2023 3:17 PM
To: Anthony Reggi <reggia@nccommunitycolleges.edu>
Cc: Bob Witchger <witchgerb@nccommunitycolleges.edu>
Subject: RE: CTSO's

Good afternoon Anthony.

I trust all is well in the beautiful State of NC.

To address your question, here is my guidance regarding the topic at hand.

If the CTSO related items and jackets were to be given to students for their individual and personal use and not returned to the State or in this instance, the colleges, then the use of Perkins funds would be prohibited.

However, given the scenario that you have outlined, the case could be made to accept this expenditure as a permissible cost, under the following conditions:

(1) the jackets and other items, would be a part of a permanent inventory;
(2) the items would be checked out, similar to when a student checks a book from a library, and later returned for future use by other students;
(3) the recipient and State can prove that the acquisition of the materials would help remove the financial barriers that would otherwise hinder the participation of these students in their respective CTSOs;
(4) the acquisition of such goods are linked to the Comprehensive Local Needs Assessment, as it pertains to special population recruitment, retention, and performance increases for participating students as a result of participating in these activities, and that
(5) the acquisition of such goods have not been previously paid with the State of local funds; otherwise there may be an issue with supplanting of funds.

At the State level, State leadership activities funding in section 124(a)(17) contains the following language:

> *"support for career and technical student organizations, especially with respect to efforts to increase the participation of students in nontraditional fields and students who are members of special populations"*

Perkins V appears to allow for the use of leadership funds to support CTSO, specifically for the purpose of (1) increasing the participation of students in nontraditional fields and (2) students who are members of special population.

At the local recipient level, local uses of funds section 135(b)(5)(O) of Perkins V speaks to the effect of supporting CTSOs by:

> "*supporting career and technical student organizations, including student preparation for and participation in technical skills competitions aligned with career and technical education   program standards and curricula*".

As you can see, this section of the legislation contains very broad language that talks about "supporting" (which can probably be used to justify quite a few things) CTSO organizations and then gives clear examples focusing on preparation and participation in CTSO competitions that are aligned with CTE program standards and curriculum.

A case could probably be made that it is allowable if the costs are necessary and reasonable, allocable to the grant and the local school district or college can rebut the presumption of supplanting.

Given the information provided, here are some guiding questions that my help your State determine whether to use its Perkins funding for CTSO activities:

(1) Is the State considering the use of State leadership funds or local funds to cover the costs associated with a CTSO jackets and other materials?
(2) If local funds are to be used by the recipients, how are the expenses of CTSO related expenses linked to the results of the Comprehensive Local Needs Assessment (CLNA)? In Perkins V, the use of funds under section 135 are directly tied to the results of the CLNA. Is paying for a CTSO materials reflected as a need in the CLNA?
(3) Are State and local recipients thinking of using Perkins funds to increase nontraditional participation and/or to help students from special populations?
(4) Have local recipients or the State paid CTSO for similar items previously using State or local funds? If so, then there may be an issue of supplanting.
(5) Would the use of Perkins funding for CTSO materials and items dilute the funds available to run other critical program areas and initiatives?

I hope this information has been helpful in answering your question, but most importantly in helping the State to develop clear guidelines regarding the use of Perkins funds for CTSO related expenses. The bottom line is that State needs to develop a program policy and make a judgement call on this and be able to defend it if questioned by an auditor.

Also, please note that, in addition, under CFR § 200.403, except where otherwise authorized by statute, all costs must meet the following general criteria in order to be allowable under Federal awards:

(a) Be necessary and reasonable for the performance of the Federal award and be allocable thereto under these principles.
(b) Conform to any limitations or exclusions set forth in these principles or in the Federal award as to types or amount of cost items.
(c) Be consistent with policies and procedures that apply uniformly to both federally-financed and other activities of the non-Federal entity.
(d) Be accorded consistent treatment. A cost may not be assigned to a Federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the Federal award as an indirect cost.
(e) Be determined in accordance with generally accepted accounting principles (GAAP), except, for state and local governments and Indian tribes only, as otherwise provided for in this part.
(f) Not be included as a cost or used to meet cost sharing or matching requirements of any other federally-financed program in either the current or a prior period. See also § 200.306 Cost sharing or matching paragraph (b).
(g) Be adequately documented. See also §§ 200.300 Statutory and national policy requirements through 200.309 Period of performance of this part.

Best,
José

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Appendix D Budget Modification Template

To submit a plan/budget modification you need to update the most recently approved local plan in Excel. Then complete the budget modification form to get signed. Depending on the significance of the modification, you may need to submit both the plan and modification form.

The modification form:

	A	B	C	D	E	F	G	H
4								
5	College Name:		Enter College Name here					
6								
7	Voc Code		Briefly describe the request by each Voc Code.			Enter Current Budget	Enter Change Requested	Proposed Modified Budget
8	10							$ -
9	11							$ -
10	12							$ -
11	13							$ -
12	14							$ -
13	15							$ -
14	16							$ -
15	17							$ -
16	18							$ -
17	19							$ -
18					Totals:	$ -	$ -	$ -
19	Justification							
20								
21								
22	"By signing this report, I certify to the best of my knowledge and belief that the report is true, complete and accurate, and the expenditures, disbursements and cash receipts are for purposes and objectives set forth in the terms and conditions of the Federal award. I am aware that any false, fictitious, or fraudulent information, or the omission of any material fact, may subject me to criminal, civil, or administrative penalties for fraud, false statements, false claims, or otherwise. (U.S. Code Title 18, Section 1001 and Title 31, Sections 3729-3730 and 3801-3812)."							
23								
24								
25	Signature of Perkins Contact			Date	Signature of Chief Financial Officer			Date
26								
27	Completed by NCCCS		☐ Approved		☐ Not Approved			
28								
29								
30	CTE Program Coordinator			Date	CTE Director			Date
31								
32								

Always enter the most recently approved budget into column F, then enter the changes you are proposing into column G where it says "Enter Change Requested". Column H, the "Proposed Modified Budget" will calculate for you.

Add the new activities in the brief description section and connect it to the CLNA gap this activity is addressing.

	A	B	C	D	E	F	G	H
1		Strengthening Career and Technical Education for the 21st Century Act						
2		Fiscal Period 7/1/2022 - 6/30/2023						
3		BUDGET MODIFICATION						
4								
5	College Name:	The Witchger College of Happenstance						
6								
7	Voc Code	Briefly describe the request by each Voc Code.				Enter Current Budget	Enter Change Requested	Proposed Modified
8	10	Assistant for grant				$ 10,000.00		$ 0.00
9	11	Chris Droessler webinar series on "Finding Your CTE Innerself"				$ 12,000.00		12,000.00
10	12	Send Mechatronic staff to "well that happened conference"				$ 15,000.00	$ 5,000.00	$
11	13					$ -		$ -
12	14	embed geometry in the "There's always an angle Welding class"				$ 20,000.00	$ (5,000.00)	15,000.00
13	15	Alignment of "The S turn" POS in the civil engineering class				$ 7,000.00		$ 7,000.00
14	16	longitudinal study on the benefit of logitudinal studies				$ 3,000.00		$ 3,000.00
15	17	static strips for the "standing hair" electrical class				$ 8,000.00		$ 8,0 00
16	18	Staff physician				$ 75,000.00		$ 00
17	19	SkillsUSA NC				$ 10,000.00		,000.00
18					Totals:	$ 160,000.00	$ -	160,000.00
19	Justification							
20	Faculty physician needed more training on treating shock victims and burns (Mechatronic CLNA Section D, bullet 4)							

Appendix E Time and Effort Forms

There are three types of employees, with three different time-and-effort forms:

1. 100 percent CTE/Perkins approved activities paid 100 percent through the college's Perkins Basic Grant.
2. 100 percent CTE/Perkins approved activities, paid partially through the college's Perkins Basic Grant and partially through another source.
3. Activities are split between CTE/Perkins approved activities that are paid for by the college's Perkins Basic Grant and other activities paid for by other sources. This requires a detailed documentation of time.

These forms may be found at https://www.ncperkins.org/course/view.php?id=8

Semi-Annual Certification Statement Form for Employees Working in a Single Federal Award

---

Semi-Annual Time Certification Form

Date: _____

College: _____

This is to certify that I, _____, have worked **100%** of my time from <mark>DATE</mark> through <mark>DATE</mark> on Perkins V allowable Career and Technical Education program activities. Funding for my position is **100%** from the Perkins V Local Basic Grant.

_____   _____

    Signature   Position/Title   Date

Supervisor:

I, _____, have full knowledge of 100% of these activities.

_____

    Signature   Position/Title   Date

Perkins Primary Contact:

I, _____, have reviewed this activity report.

_____

    Signature   Position/Title   Date

Semi-Annual Certification Statement Form for employees working 100 percent of their time on Perkins Act allowable activities

---

Semi-Annual Time Certification Form

Date: _____

College: _____

This is to certify that I, _____, have worked **100%** of my time from <mark>DATE</mark> through <mark>DATE</mark> on Perkins V allowable Career and Technical Education program activities. Funding for my position is

_____% Perkins Grant

_____% Local/Other Funds

_____

      Signature   Position/Title

Supervisor:

I, _____, have full knowledge of 100% of these activities.

_____

      Signature   Position/Title

Perkins Primary Contact:

I, _____, have reviewed this activity report.

_____

      Signature   Position/Title

Employee Split Time and Effort Form

	A	B	C	D	E	F
1	**Personnel Activity Report** **Perkins V Split Time & Effort**				**ANTICIPATED** **EFFORT**	**Percentage** **Of Time**
2					*Perkins*	0.00%
3	College:				*Other*	0.00%
4	Employee Name:				*Other*	0.00%
5	Employee Title:				*TOTAL*	0.00%
6	Month/Year:					
7			ACTUAL EFFORT FOR THE MONTH			
8	Dates	Time Spent on CTE/ Perkins Related Activities	Time Spent on Non-Perkins Related Activities	Sick, Holiday, or Annual Leave*	Actual Effort Hours Total	Perkins Voc Code(s) from below
9					0	
10					0	
11					0	
12					0	
13					0	
14	Totals	0	0	0	0	
15				Total All Hours	0	
16	*Perkins Voc Code Descriptions			I hereby certify that the information contained in this Personnel Activity Report accurately reflects 100% of my actual time and effort distribution for the month reported.		
17						
18	11 Career Exploration					
19	12 Professional Development			Employee Signature		Date
20	13 Skill Attainment					
21	14 Academic Integration			Supervisor signature		Date
22	15 Increase student achievement					
23	16 Evaluation of CTE Programs (including for the CLNA)			College Perkins Primary Contact		Date

NCPerkins Moodle Tutorial

North Carolina Community College System

NCPerkins Moodle Tutorial

April 2023

Learning that works for North Carolina
CTE

1

Purpose of NCPerkins

NCPerkins (https://www.ncperkins.org) is a Moodle site.

We use a Moodle "course" as a secure on-line method of collecting Perkins grant documents from each college.

We also use the Moodle to share information – typically on the landing page.

2

NCPerkins.org Landing Page (login not required)

Information includes:

- Perkins Handbook and CLNA Guide
- Links to the data dashboards and dashboard information
- Link to meeting and presentation registration and recordings
- Time and Effort Forms
- Link to the CTE/Perkins Team

3

Logging into your college's account
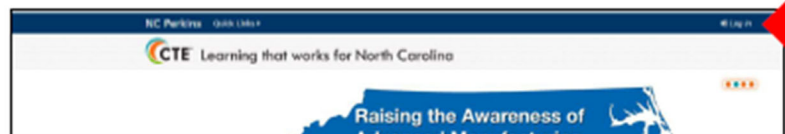
Each college has a username that starts with the beginning of their college's name.

For example: alamance or blueridge

4

Each year has a "course"

Click or hover over "My Courses" to show the dropdown list of available courses. Scroll down to select one.
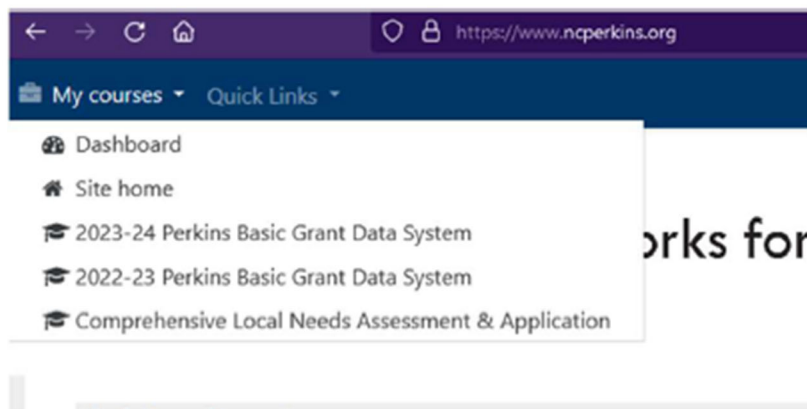
5

2023-24 Course is organized by due date

▶ Open all   ▼ Close all

Instructions: Clicking on the section name will show / hide the section.

1 ▶ Due June 2, 2023 Contacts (update as needed)   Topic 1
2 ▶ Due June 2, 2023   Topic 2
3 ▶ Due June 2, 2023 Job Descriptions (update as needed)   Topic 3
4 ▶ Budget and Plan Modifications (submit as needed)   Topic 4
5 ▶ Due January 12, 2024   Topic 5
6 ▶ Due May 17, 2024   Topic 6
7 ▶ Due July 10, 2024   Topic 7
8 ▶ Performance Improvement Plans (if required)   Topic 8
9 ▶ Desk Monitoring (if required)   Topic 9

6

Click on an arrow to open that section

7

8

Enter a new contact

2022-23 Perkins Basic Grant Data System

Enter Contact Information

Return to: Due June 3, 202... →

View list | View single | Search | Add entry

You must add 3 more entry/entries in ___ complete this activity

No entries in database

3

◄ Announcements

Jump to... ▼

Allotment Options Form ►

Return to: Due June 3, 202... →

9

Enter contact information

Select "Save and add another" until all required Roles have been entered, then select "save and view" to finish.

You may enter more than one contact for each role.

Enter Contact Information

Return to: Du

View list | View single | Search | Add entry

New entry

College:
Test College ▼

Title:
Ms. ▼

First Name:
Patti

Last Name:
Coultas

Job Title:
CTE Coordinator

Phone:
(919) 807-7130

Cellphone:

Email:
coultasp@nccommunitycolleges.edu

Role:
- Primary Contact
- Secondary Contact (Optional)
- Chief Academic Officer
- Chief Financial Officer
- Special Populations Contact
- NC-NET Liaison

Save and view | Save and add another

10

Editing a contact

- Select Enter Contact Information from the main course page

- Scroll down to the contact that needs editing

- Select the edit icon

- When done, select "Save and view"

College: Test College
Title: Ms.
First Name: Patti
Last Name: Coultas
Job Title: CTE Coordinator
Phone: (919) 807-7130
Email: coultasp@nccommunitycolleges.edu
Role: Primary Contact
Cellphone:

11

Navigating within the course

When the task on a page is completed in a course, you may
- return to the top of the course page by selecting the course title on the navigation toolbar (arrow A)
- go to the section the current assignment is in by selecting "Return to:" (arrow B), or
- return to the NCPerkins landing page by selecting the CTE Logo (arrow C)

NC Perkins   🏠 My courses ▸   Quick Links ▸   📖 This course ▸   👥 Participants ▸

C   CTE Learning the Works for North Carolina

Home ❯ My courses ❯ 2022-23 Perkins Basic Grant Data System ❯ Due June 3, 2022 ❯ Enter Contact Information ❯ View list

2022-23 Perkins Basic Grant Data System

Enter Contact Information   Return to: Due June 3, 202... ◀

View list   View single   Search   Add entry

B

12

Using assignment templates

1. Select the template and download the file.
2. Open and then save as a new file name, preferably with the college name in the title.
3. Complete the template and save

Assurances

Please download the form, complete it, and upload the signed form at the link below.

Step 1 → Assurances Form

Submit Signed Assurances

13

Submitting documents

Assurances

Please download the form, complete it, signed form at the link below.

Assurances Form

Step 1 → Submit Signed Assurances

Submit Signed Assurances

Submission status

Submission status	No attempt
Grading status	Not graded
Due date	Friday, 3 June 2022, 10:55 PM
Time remaining	67 days 7 hours
Last modified	-
Submission comments	Comments (0)

Step 2 → Add submission

14

Drag document(s) into submission box

Submit Signed Assurances

You may drag more than one file. If you reach the file limit, contact your CTE Coordinator

Step 1

Once all the documents have been added, select "save changes"

Step 2

15

View List of Assignments

To view a list of assignments, due dates, submission status, & grade

1

Step 2

16

17

18

19