**1. What “Supplement, Not Supplant” Means**

Federal Perkins V funds must add to (supplement) the state and local funds a college already spends on Career and Technical Education (CTE). They cannot replace (supplant) those state or local funds.

In practice:

* Supplementing means using Perkins funds to enhance, expand, or improve CTE programs and services beyond what would otherwise be provided with state and local resources.
* Supplanting occurs if Perkins funds are used to pay for something the college is already required to provide by law, regulation, or local policy or something that was previously paid for with non-federal funds without a documented change in circumstances.

**2. Indicators of Supplanting**

You may be supplanting if:

1. Required by Law or Policy  
   Perkins funds pay for an activity, service, or position the state, district, or college is mandated to provide under state law, local policy, or board rule.
2. Prior Year Funding Source  
   Perkins funds are used to pay for an activity, service, or position previously funded with non-federal funds without a justifiable programmatic reason (such as a documented, unplanned funding shortfall or program redesign).
3. Across-the-Board Cuts Avoidance  
   Perkins funds replace state or local funds in a way that allows the college to redirect its own resources to non-CTE purposes.

**3. Examples**

**Allowable (Supplementing)**

* Purchasing new equipment to expand the CTE program into an emerging industry area not previously offered.
* Funding industry-recognized credential exams for CTE students when the college has never before offered or paid for these exams.
* Providing specialized professional development on cutting-edge industry technologies for CTE faculty beyond standard PD offerings.

**Not Allowable (Supplanting)**

* Using Perkins funds to pay the salary of an existing instructor previously funded with state funds, unless there is a documented, allowable change in circumstances.
* Replacing college-funded CTE materials with Perkins funds so that local dollars can be used elsewhere.
* Covering costs of mandated safety training required for all students across the institution.

**4. Documentation is Key**

To defend against a finding of supplanting, maintain clear written evidence showing:

* The need for the expenditure.
* How it aligns with the college’s Comprehensive Local Needs Assessment (CLNA) and Local Plan.
* That the cost is above and beyond what is required or previously provided with non-federal funds.
* Any change in circumstances (e.g., loss of local revenue, new program launch) that justifies a shift in funding source.

**Quick Reference**

| **Term** | **Meaning** | **Key Question** |
| --- | --- | --- |
| **Supplement** | Add to existing state/local CTE spending to expand, enhance, or improve programs | “Does this provide something new or better for CTE students?” |
| **Supplant** | Replace existing state/local CTE spending with federal funds | “Are we using federal funds to pay for something we already do or are required to do?” |

**NCCCS Guidance:**  
When transitioning a cost from another funding source to Perkins, colleges should either:

1. **Include a gap year** between funding streams, **or**
2. **Provide clear documentation** showing that the previous funding source is no longer available.

**\*Additional information** on this topic can be found in Appendix C of the 2025-2026 Perkins Handbook.

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