NC COMMUNITY COLLEGES
CREATING SUCCESS

2021-2022

Perkins Handbook

2021-2022

Perkins Handbook

April 2021

North Carolina Community College System

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Table of Contents

Contents

2021 – 2022 Perkins V Handbook

Introduction

This manual 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 manual 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 2020 – 2023 North Carolina State Career and Technical Education Plan.

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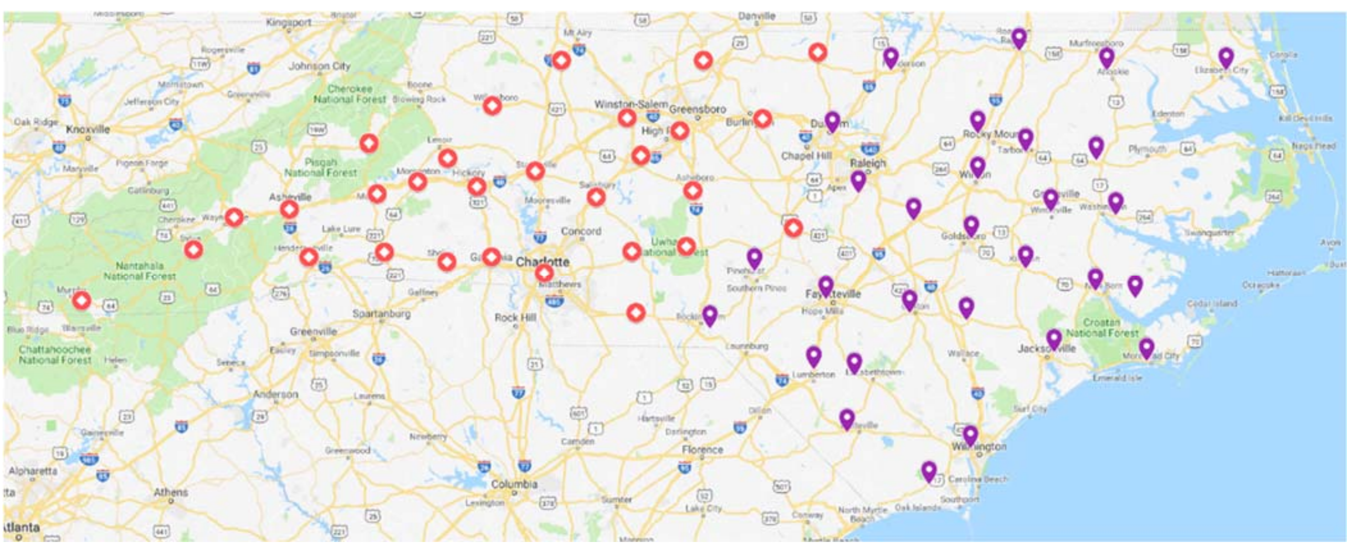
Two NCCCS CTE Coordinators are assigned to the eastern and western colleges and are that institution's point of contact for questions and assistance with their Perkins Basic Grant.

East Region – Patti Coultas, CTE Program Coordinator

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

West Region – Dr. Tony Reggi, CTE Program Coordinator

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



2021-2022 Timeline

Monthly Perkins Technical Assistance Webinars (required) are held the second Tuesday of each month. To register go to NCPerkins.org/presentations scroll down to the date to find each session.

- August 10, 2021
- September 14, 2021
- October 12, 2021
- November 9, 2021
- No December meeting
- January 11, 2022
- February 8, 2022
- March 8, 2022
- April 12, 2022
- May 10, 2022
- June 14, 2022
- No July meeting

Important Dates, Meetings, and Events

- Third Wednesday of each month, 9 am, Raising the Awareness of Career Pathways in NC Webinars
- April 13, 2021 – Annual Meeting 9-11am
- April 26, 2021 – Submit negotiated levels of performance www.ncperkins.org/data/negotiation_form.php
- May 15, 2021
  - Last day to submit a budget modification for 2020-21
  - Enter your college's contact information for Perkins Grant for 2021-22
- May 29, 2021 – Local Plan and Budget Due
- June 12, 2021
  - Allotment Options signed and uploaded for 2021-22 academic year
  - Statement of Assurances signed and uploaded for 2021-22 academic year
- May 24 – June 11, 2021 End-Of-Year Reviews
- September – May 2021 – Technical assistance visits to the colleges
- December 18, 2022 – Submit Pathways and locally articulated course list
- January 2022 – Mid-year Review
  - Submit 2nd Quarter local plan update and December 31, 2021 XDBR
  - Submit Semi-annual Time Certification (July-December 2021)
  - Notify community colleges if performance indicator improvement plans are needed
  - Colleges verify Pell and BIA student numbers
- March 2022 – Monitoring. Both on-site and desk monitoring on selected community colleges
- April 2022 – Annual Meeting - date to be determined
- April 2022 – Submit negotiated levels of performance for each indicator
- May 13, 2022 – Last day to upload a budget modification
- May 2022 – submit CLNAs for 22/23 through 23/24 and Local Plan/Budget (specific dates TBD)
- May 31 - June 17, 2022 (tentative) – End-of-year Review
- July 16, 2022 – Final local plan status update, Final XDBR, and Semi-annual Time Certifications (December – June 2022)

Perkins V

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

The purpose of this 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)

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.

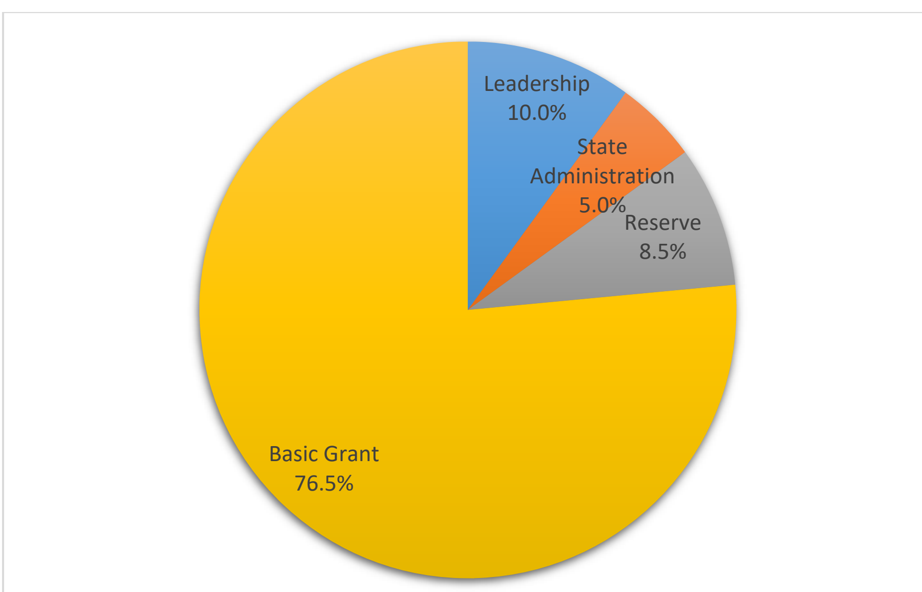
The community colleges and consortia of community colleges offering CTE programs are eligible for Perkins funds provided that the funding to be allocated through the formula-funding process is not less than $50,000. Allocations to individual colleges are based on the percentage of postsecondary CTE students 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 (local Financial Aid staff usually assists in collecting this information). 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). 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:

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

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 132).



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.

Local Use of Funds

Comprehensive Local Needs Assessment

Perkins V requires that each college complete a comprehensive local needs assessment (CLNA) which promotes data-driven decision making on local spending. The CLNA is for two years, when it must be updated or retired. Updating CLNAs may be completed at any time and additional CLNAs may be completed to ensure all needs of the region are covered.

Each CLNA must include a review of student performance; program size, scope, and quality; labor market needs; educator professional development; and special populations' access to and support for CTE programs. A diverse body of stakeholders is required to conduct the CLNA, develop the application, plan and budget, and to complete ongoing modifications. Ongoing consultation with the stakeholders is required. More information on completing a CLNA can be found in a separate NC Perkins guide at NCPerkins.org and in Perkins V section 134(c).

To better align Perkins V emphasis on special populations and subgroups, colleges should review their CLNAs to emphasize equity in their planning and budgeting. Specifically, reducing access barriers and reducing achievement gaps for special populations and underserved students.

Perkins V defines Special Populations as

(A) Individuals with disabilities;
(B) Individuals from economically disadvantaged families, including low-income youth and adults;
(C) Individuals preparing for non-traditional fields;
(D) Single-parents, including single pregnant women;
(E) Out-of-workforce individuals;
(F) English learners;
(G) Homeless individuals described in section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
(H) Youth who are in, or have aged out of, the foster care system; and
(I) 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)(10 of such title).

Elementary and Secondary Education Act of 1965, Section 1111(c)(2)(B) [Perkins Section 114(e)(8)(B)(i)]

Subgroup of students.
(A) Economically disadvantaged students;
(B) Students from major racial and ethnic groups;
(C) Children with disabilities; and
(D) English language learners.

See the NCCCS CLNA Handbook in Appendix D starting on page 36.

Local Application

For a college to be eligible for funding each college 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 until 2023. 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 the following list:

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, 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 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 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 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.

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 indictor area that is deficient?**

   Colleges not meeting at least 90 percent of the target for a 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. **Is the activity new or does it improve or expand an existing program?**

   In general, the college must use federal funds to improve career and technical education programs. This means that eligible colleges must target the limited federal dollars for new or improved activities. *NOTE: Colleges must use funds for program improvement and expansion as identified in their CLNA, and not to maintain existing activities.*

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

5. **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. Each Voc Code 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.

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

   Perkins funds may not be used to continue an activity funded by any non-Perkins funds the previous year when those funds still exist. For example, state funds. This would be supplanting, which is expressly prohibited by law.

7. **Is the activity required by federal, state, or local law?**

   If so, this would be supplanting and should be funded with non-Perkins funds.

8. **Are there data to support the identified need for the proposed activity, and can the impact of Perkins funding be measured?**

   How are Perkins funds used must be supported by data at the program level in their CLNA? The college must also have the capacity to measure improvements attained because of the use of Perkins funds. If an activity cannot be measured, it cannot be funded with Perkins funds.

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

   How are activities planned to address equity?

Basic Grants

In accordance with the Perkins V, Section 135, funds made available to eligible colleges under this part shall be used to support **career and technical education programs**. The USDOE Office of Career, Technical, and Adult Education (OCTAE) policy is that while a recipient must demonstrate that they are complying with all mandatory uses, the recipient does not have to use federal Perkins funds to satisfy all required uses.

As required by the Perkins Act section 135(d), a college may 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, including the supervision of such activities. Any cost that supports the management of the Perkins 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. *See an explanation of Voc Code 10* on page 11.

> NOTE: 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.

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 needs 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 pages 202-205 of Perkins V- The Official Guide (Hyslop)

(2) provide professional development for teachers, faculty, school leaders, administrators, specialized instructional support personnel, career guidance and academic counselors, or paraprofessionals. For specific details on allowable professional development, see page 203 of Perkins V- The Official Guide.

(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 specific elements, see pages 204-205 in the Perkins V- The Official Guide.

(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).

Reserve Funds

NCCCS takes 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 will be distributed based on a formula established by the State CTE Director and approved by the NC State Board on Community Colleges. If Reserve Funds are distributed, Budget Voc Code 28 "Reserve Fund and Other Special Funding" will be used to account for these funds.

Additional NCCCS Spending Guidance

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

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

2. 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 CLNA.

3. 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**

   *See Appendix B for more on the criteria for selecting CTSOs.

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. College provides 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 program coordinator.

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 Executive Order 12549, 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, Section 213)

Compliance with EDGAR

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)

Perkins Budgets

Colleges must have clearly defined and documented processes as part of their respective policy guidelines for budgeting. The college's Perkins budget has ten primary categories each with its own *Voc Code*. 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".

NCCCS Budget Voc Code Categories:

NCCCS budget codes changed in academic year 2020-21, Vocational Codes 10-19 will continue to be used to account for Perkins V basic grant funds, as approved by the NCCCS Career and Technical Education Director, as well as the associated non-federal matching costs.

The term *CTE Program of Study* is defined as a coordinated, nonduplicative sequence of academic and technical content at the secondary and postsecondary level. This includes all curriculum programs that do not begin with A10 (college transfer) C10, D10, T90, or P10.

Perkins V stipulates required uses of funds as outlined in section 135(b). Expenditures must be documented in the college's approved local plan and budget or in an approved modification to the local plan and budget. Expenditures that are not documented in the college's approved local plan and budget could result in disallowed costs.

Voc Code Definitions

10 Administration – As stipulated by the 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 July, Aug., Sept. 2019	CTE Allotment Oct. 2018- June 2020	Infrastructure Costs^	Total Allotment 2019-20	Admin - 5%	Admin Costs Availalble
			Approx. 30%	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, development of plans for graduation and career plans, guidance /career counselors that provide information on postsecondary education and career options, any other activity that advances knowledge of career opportunities and assists students in making informed decisions about future education and employment goals, including nontraditional fields, provides students with a strong understanding of all aspects of industry.

12 Professional Development (section 135(b)(2) - provide professional development for teachers, 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; that provide opportunities to advance knowledge, skills, and understanding in pedagogical practices; training 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, 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 access; 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)) – appropriate equipment, technology and instructional materials (including support for library resources). Funds **may** be used for equipment that is aligned with business and industry needs, including machinery, testing equipment, tools, implements, hardware and software, and other new and emerging instructional materials. All equipment purchases must be an identified need in the college's Comprehensive Local Needs Assessment.

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.

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 Review and Approval Process

The following general actions are taken for annual Perkins budgets:

1. Colleges will submit their annual Perkins budget in the Perkins Online Data System Moodle in the current year's course located at NCPerkins.org
2. All items in the annual 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 reviews and approves 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 purchases once the funds are made available.

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. There must be a clear linkage between the modification request and the CLNA. 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 mid-May of each year.

Budget modifications must adhere to the following:

1. **Relation to cost principles**. The cost principle requirements of EDGAR 2 CFR Part 200 Sub-part E apply.
2. **Local Plan**. When a budget modification is made, the college's local plan must be 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 for the proposed revision.**
4. **Programmatic changes**. Revision of the scope or objectives of the program requires prior approval.
5. **Final budget amendments** for the current fiscal year must be submitted no later than May 15. ***Any amendments past this date may not be approved.***

Other Considerations

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.

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.

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 the NCCCS CTE Coordinator

Non-Allowable Expenditures

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

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

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.

1. Colleges may begin to obligate funds in accordance with their substantially approved form 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 15, 2021. 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.

<u>Disposition</u>

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

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. See Appendix C for sample forms.

1. 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 C 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.

Local Plan Requirements

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 local comprehensive 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. See Perkins V, Section 134(d) for the entire list. With the inclusion of a CLNA, the Perkins 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 134(b)(1) through (6), colleges must conduct certain activities. See page 9 of this handbook for the required uses of funds.

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.

Review current CLNA summaries and determine if they need to be updated or new needs assessments conducted on additional programs.

Using the **needs identified in the CLNAs**, collaboratively develop, write, and submit for approval, your college 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 with appropriate EDGAR guidance.

Coordinate the implementation of grant-funded activities throughout the year.

Coordinate spending with all CTE Programs of Study.

Prepare and submit modifications on the local plan and budget as needed.

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 equipment lists.

Work to enhance the 9-14 CTE Framework -- HS to CC to Work -- CTE Pathways within CCP. Review Memorandum of Understanding with high schools around CTE Programs of Study, this is an extension of the Career and College Promise Memorandum of Understanding.

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**

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.

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. Please enter a status then explain more in the second column. Update the equipment list and salaries and note what was changed on those tabs. This update is to show activities planned and accomplished. These updates must be uploaded into NCPerkins.org.

Additionally, there will be on-line or regional meetings in January. The mid-year meetings 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 June colleges must complete the final status of each activity in their plan. Enter a status then explain more in the second column. Update the equipment list and salaries and note what was changed on those tabs. These updates must be uploaded into NCPerkins.org.

Additionally, each college will submit a one-page narrative (bullets are fine) highlighting the activities in the nine areas this year. A five-minute-or-less promising practices video must 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.

Accountability

Perkins Core Indicators of Performance

The performance indicators changed from Perkins IV to Perkins V. There are now three accountability measures that are used at both the state and local level. The Perkins V 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 a data portal online at https://www.ncperkins.org/data that show the college's progress toward the state and local goals.

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 year. 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.

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.

On-Site Monitoring

Perkins V places emphasis on subrecipients conducting a comprehensive local needs assessment (CLNA) and writing local plans to address gaps in program performance while enhancing pathways, aligning programs of study, 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). 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 – Perkins V Overview

The Strengthening Career and Technical Education for the 21st Century Act Implementing

The Strengthening Career and Technical Education for the 21st Century Act (Perkins V) reauthorized the Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV). 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 Every Student Succeeds Act (ESSA), 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 subbaccalaureate 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 use of 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 required activities of every CTE program 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*

Appendix B – Career and Technical Student Organizations

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"

The National Coordinating Council (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:

1. 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.
2. 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.
3. 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

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 (FFA) for agriculture students
5) SkillsUSA

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/

Appendix C – 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 DATE through DATE 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 DATE through DATE 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

Appendix D – CLNA Guide

Postsecondary Guide for the Comprehensive Local Needs Assessment for Perkins V

(Carl D. Perkins Career and Technical Education Act of 2006
as amended by the
Strengthening Career and Technical Education for the 21st Century Act)

July 16, 2019

Table of Contents

Introduction

Sources for this document include: Maximizing Perkins V's Comprehensive Local Needs Assessment & Local Application to Drive CTE Program Quality and Equity, by ACTE March 2019; Louisiana Perkins V: Comprehensive Local Needs Assessment Guidebook;
H.R.2353 - Strengthening Career and Technical Education for the 21st Century Act available at: *https://www.congress.gov/bill/115th-congress/house-bill/2353/text*

On July 31, 2018, the President signed into law the *Strengthening Career and Technical Education for the 21st Century Act* (Perkins V), which reauthorized and amended the *Carl D. Perkins Career and Technical Education Act of 2006*. One of the most significant changes in Perkins V is the new requirement for local eligible recipients to conduct a comprehensive local needs assessment and update it at least every two years. The relevant text from the Act is in Appendix A.

The new local needs assessment is designed as the foundation of Perkins V implementation at the local level—it drives the local application development and future spending decisions. This process should be seen as a chance to take an in-depth look at the college's entire local Career and Technical Education (CTE) system and identify areas where targeted improvements can lead to increased opportunities for student success. The needs assessment, if implemented thoughtfully, can also be a powerful opportunity to engage stakeholders in a common understanding and vision for the future of CTE in the region. To implement the local needs assessment, a wide range of stakeholders must gather to evaluate how the overall CTE programs measure up on:

- A. Performance on federal accountability indicators:
- B1. Size, scope, and quality of programs offered
- B2. Alignment to local/regional labor market needs
- C. Progress toward implementing programs and programs of study
- D. Recruitment, retention, and training of faculty and staff
- E. Progress toward improving access and equity

State Role

North Carolina CTE will be developing guidance around the local needs assessment and offering suggestions for coordinated engagement with key players in career pathways, sector partnerships, as well as alignment with needs assessments required for the Every Student Succeeds Act (ESSA) (the most recent iteration of the Elementary and Secondary Education Act (ESEA)) and for the Workforce Innovation and Opportunity Act (WIOA), among other federal and state policies.

As this process begins, North Carolina CTE may facilitate collaboration among local recipients, or allow locals to drive intrastate regional approaches to the comprehensive local needs assessment through consortia or other partnerships.

This guide provides key definitions relevant to the comprehensive local needs assessment language in Perkins V as well as definitions for accountability indicators and other relevant terms and time lines for the submission of the local needs assessment and local plans.

Using state and local goals to guide the process will help ensure the outcomes will be valuable in driving CTE program improvement in each community, without creating tremendous new administrative burden.

Assistance in this process can be found through consultation with other local federal program representatives in the community (such as those responsible for implementation of ESEA and WIOA) to gain ideas and best practices related to how they have approached their required needs assessments.

Many ongoing activities may be part of the needs assessment. The information collection and consultation activities for the assessment do not have to be new or different from what the community may already be doing. The data collected, the relationships formed with industry and community partners, and the processes for curriculum development and revision and program approval are all relevant foundations for the needs assessment.

Perkins V requires that all these pieces are pulled together strategically and intentionally to help the community plan for the future.

In addition, the needs assessment can be scaled to fit the particular context. The sections that follow outline a wide array of action items and provide numerous questions to help communities think through the process. However, it is not likely that all these questions or activities will be appropriate for all local areas. Use this tool to draw ideas, and within the overarching state and federal requirements, pick the pieces that work best for the community. The needs assessment process may look very different in smaller or more resource-limited local areas than in more populated areas with larger numbers of potential partners and employers.

The local needs assessment process is about helping communities use information to ensure that local CTE programs help create success for students and employers. The activities of the local needs assessment should become a regular part of the overall college data-driven decision making and program improvement cycles—not merely an additional activity every two years. By fully integrating this new Perkins V needs assessment into routine activities, colleges will be able to realize the full value of the process.

Getting Started: Foundations of a Rigorous Assessment Process

The following four steps will help colleges use data and information more strategically and lay the groundwork for a rigorous needs assessment process through clear goals, preparation, and organization.

1. Determine Local Goals

State education and workforce goals must be integrated into the needs assessment along with local priorities.

For example, the following are goals that may align the needs assessment with the local application:

- developing a process for program justification,
- increasing the number of students earning industry certifications,
- strengthening industry advisory board engagement, and

- closing equity gaps.

If the college has already established a strategic plan or "vision" for the local CTE programs, it is important to use the needs assessment to inform and possibly modify those goals. If the college does not already have a set of strategic priorities, the needs assessment can help identify those for the future.

2. Identify Stakeholders and a Leadership Team

Consultation with "a diverse body of stakeholders" is at the heart of ensuring a rigorous and meaningful needs assessment process.

Perkins V identifies, at a minimum, the following participants who should engage in the initial needs assessment, local application development, and ongoing consultation:

1. CTE program representatives at the secondary and postsecondary levels including teachers, faculty, administrators, career guidance and advisement professionals, and other staff
2. State or local workforce development board representatives, chambers of commerce, economic development representatives
3. Representatives from a range of local businesses and industries, as well as non-profit agencies
4. Parents and students
5. Representatives of special populations
6. Representatives from agencies serving at-risk, homeless, and out-of-school youth
7. Representatives from Indian Tribes or Tribal organizations, where applicable

To identify stakeholders, start with individuals and organizations who are already involved with the college program advisory boards, sector partnerships, community groups, parent-teacher associations and other structures. After identifying those already engaged in the programs, reach out to new partners to fill gaps in expertise and ensure appropriate breadth and depth of representation among those impacted by CTE.

For example: the local Chamber of Commerce, while a great partner, may not include full representation of industry sectors with labor-market demand. This is an excellent opportunity to diversify the partnerships and build a stronger career pathways system among education, workforce, and community leaders through sustained relationships. Check with the NCCCS Perkins Team for requirements and guidance on partner recruitment, such as lists of contacts from relevant workforce, economic, and community development agencies.

In addition to identifying stakeholders, colleges need to select a core leadership team to guide the needs assessment and local application process and facilitate final decision-making.

This leadership team will likely consist of CTE program administrators and other key local decision-makers. The team will look different based on the size and characteristics of each institution, service area or district, but the team should have in-depth knowledge of the college's CTE programs.

3. Make a Plan for Seeking Feedback

There are many options in organizing stakeholders when seeking feedback.

- Industry advisory boards could be broadened to encompass all the suggested stakeholders or constitute a new group as a separate entity.
- The stakeholders could convene regularly or meet with subsets of partners who have expertise for particular sections of the needs assessment.

Using a combination of strategies to provide opportunities for stakeholders to engage with each other and hear diverse perspectives is likely the best approach. In addition to meetings, feedback can be gained through surveys, interviews, focus groups, listening sessions, in person or virtually—consultation does not have to be conducted entirely face-to-face.

In collaborating for stakeholder feedback ask:

- Does the college or region already survey employers, students, and parents? Are additional questions needed to increase the relevance and effectiveness of the survey?
- Does a representative of the college already participate in monthly or regular meetings with stakeholder groups? Could the representative be added to the agenda regularly to engage with community leaders on specific issues relevant to the needs assessment?

Identifying possible information collection opportunities that fit seamlessly with existing work will make the process easier and more effective. After identifying existing mechanisms, look for gaps in that outreach and consider ways to gather input from stakeholders who may not already be part of current activities. Develop a continual feedback loop with key stakeholder groups to meet ongoing consultation requirements. To keep partners motivated, regularly show them the results of their input and publicly recognize their contributions. ACTE provides guides, toolkits with sample documents, and best practices for engaging community partners. These can be found at

https://www.acteonline.org/professional-development/high-quality-cte-tools/business-and-community-partnerships/

4. Gather and Develop Materials

Begin to build the evidence base for the needs assessment by compiling already-available sources of regional, state, and local information and by developing plans to collect new data.

Needed data can come from internal sources, such as student performance data, student and parent survey findings, and feedback from local industry advisory boards, or from external sources, including the NC Department of Commerce labor-market information (LMI). Ensure collection of information from a variety of sources is consistent, meaningful, and useful.

Findings from surveys and transcripts from focus groups and listening sessions can be used, in turn, to spark further discussion among stakeholders. Look to local and state partners for resources to help develop questions and deploy surveys.

The college may decide to commission one or more separate evaluations to fulfill parts of the needs assessment. An external evaluator could be a faculty member or graduate student from a local university, a program evaluation expert from a national association, a professional evaluator employed by an evaluation firm, a volunteer from the community, or a business partner who has evaluation experience and is willing to donate their time.

Suggestions on Operationalizing the Process: Translating the Law into Meaningful Assessment

The six needs assessment requirements as outlined in the law can be distilled into three main ideas: *student performance, labor-market alignment* and *program implementation*.

No one area is identified in the law as more important than another, and to meet federal requirements the needs assessment must cover all the requirements outlined in some way.

Comprehensive Local Needs Assessment (CLNA) Worksheets

CLNA Worksheet Part A: Student Performance

The law requires an evaluation of the student's performance on federal accountability measures in the aggregate and disaggregated for the subpopulations defined in Perkins V. Data must be disaggregated by gender, race and ethnicity, and migrant status (per ESEA), as well as by each of the special populations categories.

Most disaggregated data are collected by self-report at the postsecondary level. The state data systems currently have limited field capabilities, therefore an initial needs assessment will be conducted using available raw data and provide for a more in-depth review of subpopulations in the subsequent evaluations.

Review data collected including any notes from interviews, focus groups, or other methodologies. Discuss each of these questions. Assign a notetaker to record the discussion. The final version may be written **electronically** on the following form. At the end, via consensus, assign a rating and rationale to this part of the CLNA.

Materials Needed	Stakeholders and Other Resources
• Perkins performance data for the past three years disaggregated by CTE program area and special population groups • Comparison data for 'all' students – Secondary comparisons for graduation rates, academic performance and placement – Postsecondary comparisons for credential attainment and placement. • Strategies utilized to address performance gaps for specific subgroups along with outcomes for the strategies attempted	https://www.ncperkins.org/data/ NC Perkins Core Indicators of Performance Institutional Effectiveness Staff & Registrar. Specifically, the Curriculum Registration, Progress, Financial Aid Report (CRPFA) NCCCS System Office of the President/ Research Performance Management National Alliance for Partnerships in Equity (NAPE) Program Improvement Process for Equity All stakeholders required by law (see §134(d) on page 36 of this guide.

**Youth is defined pursuant to the WIOA definition as 16-24 years old.*
Suggested Strategy:

- Focus the process on building the economic capacity of the region
- Assemble groups by CTE career cluster/program to examine data. If data do not currently exist, create a plan to obtain the data for future needs assessments.
- Identify significant differences in performance between subpopulations and across programs
- Consider the root causes of these inequities to help identifying corresponding practices that can combat inequity in the CTE programs

- Complete the following form to supplement the data and root cause analysis, consider conducting surveys, interviews or focus groups with educators, counselors, students, and/or parents to gather feedback on outcomes of your programs related to equity

  Plus – strengths, going well, want to continue
  Delta – challenge, needs work, needs change, lacking

PART A: Evaluation of Student Performance		
Questions to Consider	**Plus - Notes**	**Delta - Notes**
1. How are students in each CTE program performing on federal accountability indicators in comparison to non-CTE students? Where do the biggest gaps in performance exist between subgroups of students?		
2. How are students from special populations performing in each CTE program? What are the potential root causes of inequities in performance in each CTE program?		
3. How are students from different genders, races and ethnicities performing in each CTE program?		
4. Which CTE programs overall have the highest outcomes and which have the lowest?		
5. Is there a trend across all CTE programs?		

Use the following rating for each evaluation and action step

1 Significant gaps and/or multiple gaps exist

2 Some gaps exist and/or there is not have a concrete plan to address them

3 Very few gaps exist and there are processes in place to close the remaining gaps

4 No gaps exist

PART A: Evaluation of Student Performance		
Rating	Rationale and Potential Action Steps	Perkins V Required Activity

CLNA Worksheet Part B-1: Size, Scope, & Quality

This section of the law requires an assessment of:

1. Whether the college offers a sufficient number of courses and programs to meet the needs of the student population and workforce;
2. Whether those programs are sufficiently broad as well as vertically aligned and linked to the next level of education; and
3. How the quality of program delivery serves to develop student knowledge and skills and prepare them for success.

Use as guidance in forming North Carolinas Definitions:

In its new Perkins V state plan, the state is required to include specific definitions for *size, scope,* and *quality.* States may choose to use existing definitions or update them to reflect new priorities. In the past, states have defined these terms in several ways:

- **Size:** Definitions of size typically address such factors as the minimum number of programs offered by each eligible recipient, or available to each student; the minimum number of courses offered within each program or pathway; or minimum class size. Some states have defined size through a calculation that compares CTE programs offered to total student population, and/or to overall CTE participation. Definitions may differ on the secondary and postsecondary levels.
- **Scope:** Definitions of scope typically refer to program sequencing, from introductory to more advanced curriculum; linkages between secondary and postsecondary education; and the program's ability to address the full breadth of the subject matter.
- **Quality:** These definitions may address generally whether programs have the ability to impart to students the skills and knowledge necessary for success; or may include specific criteria such as implementation of a continuous improvement plan, presence of an advisory committee, or evidence of teacher/faculty qualifications.

Review data collected including any notes from interviews, focus groups, or other methodologies. Discuss each of these questions. Assign a notetaker to record the discussion. The final version should be written electronically on the following form. At the end, via consensus, assign a rating and rationale to this part of the CLNA.

Materials Needed	Stakeholders and Other Resources
Size: • Workforce need compared to numbers completing the program • Total number of program areas and number of courses within each program area • Total number of students who could be served by the eligible recipient, aggregate and disaggregated • CTE participant and concentrator enrollments for the past several years, aggregate and disaggregated • Number of students applying to the programs, if applicable • Number of students on waiting lists, if applicable • Survey results assessing student interest in particular CTE programs Scope: • Documentation of course sequences and aligned curriculum to industry needs • Credit transfer agreements • Data on student retention and transition to postsecondary education within the program of study • Descriptions of dual/concurrent enrollment programs, and data on student participation • Data on student attainment of credentials and articulated credit • Curriculum standards that show depth and breadth of programs • Opportunities for extended learning within and across programs of study Quality: In addition to the materials listed throughout this document, it would be appropriate to consult curriculum standards and frameworks, partnership communications and engagement activities, safety requirements, work-based learning procedures, CTSO activities and alignment, data collection mechanisms and program improvement processes, and employer survey data.	https://www.ncperkins.org/data/ *NC Perkins Core Indicators of Performance* *Institutional Effectiveness Staff* *NCCCS System Office of the President/ Research Performance Management* National Alliance for Partnerships in Equity (NAPE) Program Improvement Process for Equity All stakeholders required by law (see §134(d) on page 36 of this guide.

**Youth is defined pursuant to the WIOA definition as 16-24 years old.*

When evaluating size, consider the number of programs and courses offered, as well as the number of students served by CTE programs in relation to the total student population that could be served. Examine longitudinal data, both in the aggregate and disaggregated by Perkins-defined special populations and subgroups and look forward to examining student enrollment projections over the next few years.

To evaluate scope, consider how your programs align and articulate offerings across learner levels, including curriculum, instruction, faculty and staff, facilities and equipment, and career development activities. Examine policies for, participation in and outcomes of credit transfer agreements and dual/concurrent enrollment programs. You may also want to explore whether your program is delivering the full breadth of knowledge and skills within each subject area, or if there are gaps in the curriculum and opportunities you are providing. To assess this breadth, compare your curricular offerings to state standards and state-developed programs of study, if applicable, within each CTE subject area. Also consider if extended learning experiences, such as work-based learning, CTSOs, and articulated credit, are available across all programs of study, or only in some.

To evaluate quality, consider whether the various aspects of your program—curriculum, instruction, career development, work-based learning and more—are designed and delivered in a way that imparts to students the skills and knowledge necessary for success. One way to accomplish this is to compare your program delivery and implementation to a relevant set of quality standards from the state or from a third party, such as a national organization or accreditor.

Plus – strengths, going well, want to continue
Delta – challenge, needs work, needs change, lacking

PART B-1: Program Size, Scope, and Quality		
Questions to Consider	**Plus - Notes**	**Delta - Notes**
1. What are the programs in which students are choosing to enroll and not to enroll?		
2. Are there programs with low student enrollment and high industry demand?		
3. Is the college offering a sufficient number of courses, and course sections, within each program of study?		
4. What percent of students complete a certificate, diploma, degree or other postsecondary credential?		

PART B-1: Program Size, Scope, and Quality		
Questions to Consider	**Plus - Notes**	**Delta - Notes**
How are programs of study designed to ensure students completion?		
5. Describe conversations with secondary, postsecondary and business/industry concerning developing a robust skill set in each program, the role of business and industry in development and delivery of programs of study and how quality standards are incorporated as required by industry?		
6. How is work-based learning incorporated into each programs of study?		

Use the following rating for each evaluation and action step

1 Significant gaps and/or multiple gaps exist

2 Some gaps exist and/or there is not have a concrete plan to address them

3 Very few gaps exist and there are processes in place to close the remaining gaps

4 No gaps exist

PART B-1: Evaluation of Program Size, Scope, and Quality		
Rating	Rationale and Potential Action Steps	Perkins V Required Activity

CLNA Worksheet Part B-2: Labor Market Alignment

This section the law [(§134(c)(2)(B)(ii)(I)] requires the team to consider the alignment between programs offered and the labor-market needs of the local area, state, and/or region. Identify the state definitions or thresholds for "in-demand industry sectors or occupations". State and local lists of in-demand sectors and jobs should be examined first to ground your analysis. It is important to "regionalize" the data to emphasize the local applicability of the needs assessment. In your review, include a gap analysis of the industry needs compared to the capacity of the educational institutions to meet the current and projected needs.

It is also important to consider long-term projections in addition to immediate labor market needs, particularly if your programs have a longer time horizon. Local workforce development boards, Chambers of Commerce, and local unions or industry associations may have information you can use and should be included on this committee.

As Perkins V continues to focus on aligning programs of study to high-wage, high-skill, or in-demand occupations, eligible recipients will provide an analysis of how CTE programs are meeting workforce and economic development needs. The assessment will look at how different resources are used to determine which CTE programs of study are made available for students.

As the college analyzes these data, focus on comparing the number of students graduating in each CTE program area to the number of projected job openings in relevant occupations. Be sure to look into the future, keeping in mind that the needs assessment will be the foundation of planning for four years of activities through the local Perkins grant application. Also remember that occupations for which your college programs are preparing students may be found across multiple industries.

The state- and local-validated sources of information mentioned will be fundamental. However, easy-to-use online tools can serve as secondary sources and conversation starters. These include:

- **NCcareers.org**, which displays the promising jobs for each part of the state as well as many other useful tools.
- **CareerOutlook.US**, which displays recent and projected employment and current wages by state and occupation;
- **DataUSA.io**, which can be filtered by city or county and includes recent industry, occupation and wage data; and real-time, local job postings from online search engines
- Some colleges may have also turned to analytics firms to mine real-time, job-postings data.

In addition to labor-market information (LMI), feedback from your local industry representatives and, if possible, your alumni, is critical. Local employer input can help to identify trends that may not be evident in reported data, particularly in emerging career areas, and to describe skill needs across industries. Gather employer input through informal discussions, surveys, and/or focus groups.
To learn whether students who have completed CTE programs are succeeding in the workforce, consult alumni follow-up survey results. Check with the state CTE agency to see if it has access to linked education, employment, and earnings data that can be disaggregated for your institution, district, or service area.

Review data collected including any notes from interviews, focus groups, or other methodologies. Discuss each of these questions. Assign a notetaker to record the discussion. The final version should be written electronically on the following form. At the end, via consensus, assign a rating and rationale to this part of the CLNA.

Materials to Review	Stakeholders and other Resources
• Results of any available gap analysis on educational outcomes and employment needs (from the state or separately commissioned) • State- and local-defined lists of in-demand industry sectors and/or occupations • State and locally defined in-demand soft skills • State and local LMI • Real-time job postings data from online search engines, possibly with analytics support from a data firm • Input from business and industry representatives, with particular reference to opportunities for special populations • Alumni employment and earnings outcomes from a state workforce agency or state longitudinal data system, or findings from a follow-up survey of alumni • Chamber of Commerce trend data • Labor Unions	https://www.ncperkins.org/data NC Perkins Core Indicators of Performance NC Tower/LEAD data at nccareers.org NCCCS System Office of the President/ Research Performance Management All stakeholders required by law (see §134(d) on page 36 of this guide.

**Youth is defined pursuant to the WIOA definition as 16-24 years old.*

Plus – strengths, going well, want to continue
Delta – challenge, needs work, needs change, lacking

Questions to Consider	**Plus - Notes**	**Delta - Notes**
PART B-2: Labor Market Alignment		
1. What are the highest projected growth industries in the region? What occupations are part of that industry?		
2. How are CTE programs aligned to projected job openings? How are gaps identified and minimized?		
3. Is there additional content that should be added to better align with employer demand?		
4. Where are completers able to obtain employment?		
5. What emerging occupations are available for students in each program?		

Use the following rating for each evaluation and action step

1 Significant gaps and/or multiple gaps exist

2 Some gaps exist and/or there is not have a concrete plan to address them

3 Very few gaps exist and there are processes in place to close the remaining gaps

4 No gaps exist

PART B-2: Evaluation of Labor Market Alignment		
Rating	Rationale and Potential Action Steps	Perkins V Required Activity

Program Implementation

While the following four components of the needs assessment are treated separately in the law, they all pertain to the **quality and implementation of programs**. In contrast to the **student performance evaluation,** which examines student outcomes, and the **labor market alignment analysis,** which considers needs that originate from the labor market, these four components address the decisions that the college makes when delivering CTE programs, including:

- which programs to offer;
- how to pursue alignment across learner levels and between academic, technical, and employability skill standards;
- college's curriculum and instructional strategies;
- what opportunities for work-based learning, career and technical student organization (CTSO) participation, and articulated credit are provided;
- how the college supports faculty and staff; and
- how the college ensures access and equity for all CTE students.

The college may choose to approach the rest of the needs assessment holistically through an evaluation process that encompasses all of these quality program components.

The key is to capture the full breadth of program quality and implementation. Findings from recent (or upcoming) program evaluations conducted by your state as part of a program review process or by a third party, such as a national accreditor, can form a basis for this comprehensive evaluation of program delivery and implementation. However, additional input from local stakeholders will likely be needed.

If no such evaluations are available, or if the scope of these evaluations fails to meet your needs, an evaluation of the college's programs can be conducted by demonstrating how they measure against a relevant set of standards.

These could be standards already in place in the state, or standards from a legitimate third-party organization, such as

- ACTE's evidenced based ***Quality CTE Program of Study Framework,*** which includes nearly 100 indicators across 12 elements to capture the breadth of activities that impact program scope, delivery, implementation, and quality, including elements related to the quality of program staff as well as equity and access.
- Southern Regional Education Board **(SREB) Career Pathway Reviews** and Curriculum and Instruction Reviews, which are conducted as part of SREB Needs Assessment Visits
- **Linked Learning Essential Elements of Pathway Quality** - National Center for College & Career Transitions' Design
- Specifications for Implementing the **College and Career Pathways** System Framework
- Tools from the **Council for Occupational Education** and from regional accreditors

To make the evaluation more manageable for larger districts, service areas, or institutions, the college may consider assessing the overall quality of all of the CTE programs, then selecting either a *sample of programs of study to evaluate individually each time the needs assessment is updated* or a few priority elements to review, such as work-based learning or student career development.

While this holistic evaluation of program quality and implementation will yield the least duplication, for ease of understanding the requirements as presented in law we have laid out each of the four needs assessment components related to program implementation separately as follows. Included are particular materials to gather and questions to ask about the nature of the college programs with respect to these specific topics. There is some duplication among these four components, which is noted.

CLNA Worksheet Part C: Progress Toward Implementing Programs of Study

Consider how well the college is implementing the full scope of programs of study, defined in Perkins V 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
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 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."

Review data collected including any notes from interviews, focus groups, or other methodologies. Discuss each of these questions. Assign a notetaker to record the discussion. The final version should be written electronically on the following form. At the end, via consensus, assign a rating and rationale to this part of the CLNA.

Materials Needed	Stakeholders and other Resources
• Documentation of course sequences and aligned curriculum for each CTE program • Standards for academic, technical, and employability skills taught per course • Credit transfer agreements for the program • Student retention and transfer trend data • Trend data on dual and concurrent enrollment in CTE programs • Definitions used for alignment, dual and concurrent enrollment, academic and technical standards • Trend data on student participation • Advisory committee notes/minutes • Data on credential attainment by type • Notes on industry participation • Documentation of 9-14 Pathways	• Advance CTE "Ensuring Career Pathway Quality: A Guide to Pathway Intervention" • ACTE "Quality CTE Program of Study Framework" • Southern Regional Education Board (SREB) Career Pathway Review Process • Linked Learning "Essential Elements for Pathway Quality" • All stakeholders required by law (see §134(d) on page 36 of this guide.

**Youth is defined pursuant to the WIOA definition as 16-24 years old.*

This section overlaps with the scope and quality components previously outlined in the needs assessment, as well as with the labor market alignment analysis. This is your opportunity to do a close review of the structure of your programs as well as the extended opportunities they provide to students, such as opportunities for dual enrollment or work-based learning.

Plus – strengths, going well, want to continue
Delta – challenge, needs work, needs change, lacking

Questions to Consider	**Plus - Notes**	**Delta - Notes**
PART C: Progress Toward Implementing CTE Programs and Programs of Study		
1. How fully are the programs of study aligned and articulated across secondary and postsecondary education? (i.e. grade 9-14 POS)		
2. How do the programs of study incorporate relevant academic, technical, and employability skills at every learner level?		
3. Are students being retained in the same program of study? (i.e. matriculation from secondary to postsecondary for diploma/degree completion?		
4. Do students in the programs of study have multiple entry and exit points?		
5. Are students in the programs earning recognized postsecondary credentials? Which credentials are earned at each level (certificate, diploma and degree)?		
6. What are the roles of secondary and postsecondary partners in current program of study design and delivery? To what		

Questions to Consider	Plus - Notes	Delta - Notes
extend do faculty work together to ensure complementary and seamless course content in this program?		

Use the following rating for each evaluation and action step

1 Significant gaps and/or multiple gaps exist

2 Some gaps exist and/or there is not have a concrete plan to address them

3 Very few gaps exist and there are processes in place to close the remaining gaps

4 No gaps exist

PART C: Progress Toward Implementing CTE Programs and Programs of Study		
Rating	Rationale and Potential Action Steps	Perkins V Required Activity

CLNA Worksheet Part D: Recruitment, Retention, and Training of CTE Educators

Perkins V Section 134(c)(2)(D) requires the college to assess and develop plans to improve the quality of their faculty and staff through recruitment, retention and professional development, with attention paid to diversity in the profession.

Ground the evaluation of this section in state and/or local policies and relevant terms defined in Perkins V, particularly the definition of "professional development," which emphasizes sustainability, relevance, and quality of these experiences.

When assessing the state of the college's educators, take a comprehensive view of what you know about educators, administrators, staff, and guidance and career advisement professionals across your programs. Evaluate what these educators bring to the table; their preparation and credentialing in comparison to state, district or institution requirements; and the ways they demonstrate their commitment to the profession through pursuit of advanced certification or extensive professional development. Look for gaps in expertise within and across programs. In addition, consider how to recruit educators and staff and prepare them for their responsibilities, particularly new educators coming from an industry background.

To take this analysis further, compare the current staff capacity to the college's future plans. For instance, if the college intends to develop new programs of study or expand career development services in the next four years, look at the current staff and make projections about where the college needs to increase skills or hire new people.

It is also vital to evaluate the ways in which the college is supporting faculty and staff through wages, benefits, professional development, and recruitment and retention activities. Develop surveys or conduct focus groups to seek feedback on faculty and staff needs and preferences.

In addition, consider the methods for recruiting and retaining educators and staff from populations traditionally underrepresented in the profession. Analyze the demographics of the teachers and staff in comparison to the makeup of your student body and consider to what extent students are learning from educators who reflect themselves and their communities.

To make this more robust, conduct a root causes and strategies analysis similar to that outlined in the Student Performance and Progress Toward Improving Access and Equity sections of this publication, and consult colleagues who worked on teacher shortage and diversity issues for ESEA.

Review data collected including any notes from interviews, focus groups, or other methodologies. Discuss each of these questions. Assign a notetaker to record the discussion. The final version should be written electronically on the following form. At the end, via consensus, assign a rating and rationale to this part of the CLNA.

Materials Needed	Stakeholders and other Resources
• Data on faculty, staff, administrator, and counselor preparation, credentials, salaries and benefits, and demographics • Student and community demographic data • Description of recruitment process • Description of retention process • Description of professional development, mentoring, and externship opportunities • Policy on professional development requirements for instructors (full-time and adjunct) • Data on educator participation in professional development, mentoring, and externships • Findings from educator evaluations or other resources about impact of professional development, mentoring, and externships • Survey or focus results conducted with educators regarding needs and preferences • Trend data on educator and staff shortage areas in terms of CTE area and demographics (at least past 5-10 years) • Trend data on educator and staff retention in terms of CTE area and demographics (at least past 5-10 years)	• All stakeholders required by law (see §134(d) on page 36 of this guide.

**Youth is defined pursuant to the WIOA definition as 16-24 years old.*

Strategies could include developing a work group to examine data including educators, career guidance professionals, and human resources staff. Or you could develop a focus group or conduct interviews with veteran teachers; developing teachers; individuals charged with selecting, designing, and implementing professional development; and human resource staff.

Plus – strengths, going well, want to continue
Delta – challenge, needs work, needs change, lacking

Questions to Consider	**Plus - Notes**	**Delta - Notes**
PART D: Recruitment, Retention, and Training of CTE Educators		
1. Describe the diversity in the college's faculty and staff. Does it reflect the demographic makeup of the student body or service region?		
2. What processes are in place to recruit new educators both internally and externally?		
3. What onboarding processes are in place to bring new instructors, both permanent and adjunct, into the system?		
4. What has been the impact of the onboarding processes for new instructors, especially instructors coming from industry?		
5. What substantive and effective professional development (PD) activities are offered around CTE academic and technical instruction? How is need for PD identified?		
6. How does your college provide, approve, and fund professional development activities to improve CTE faculty and staff?		

Use the following rating for each evaluation and action step

1 Significant gaps and/or multiple gaps exist

2 Some gaps exist and/or there is not have a concrete plan to address them

3 Very few gaps exist and there are processes in place to close the remaining gaps

4 No gaps exist

PART D: Recruitment, Retention, and Training of CTE Educators		
Rating	Rationale and Potential Action Steps	Perkins V Required Activity

CLNA Worksheet Part E: Progress Toward Improving Equity and Access

The law requires an **evaluation of your progress in providing equal access to CTE programs**, particularly CTE programs that lead to strong positive outcomes for students, and in providing CTE in a way that maximizes success for special populations. Specifically, §134(c)(2)(E) says

(E) A description of progress toward implementation of equal access to high-quality career and technical education courses and programs of study for all students, including—

> (i) strategies to overcome barriers that result in lower rates of access to, or performance gaps in, the courses and programs for special populations;
>
> (ii) providing programs that are designed to enable special populations to meet the local levels of performance; and
>
> (iii) providing activities to prepare special populations for high-skill, high-wage, or in-demand industry sectors or occupations in competitive, integrated settings that will lead to self-sufficiency.

Special populations are defined by Perkins V Section 3(48) as

(A) Individuals with disabilities;
(B) individuals from economically disadvantaged families, including low-income youth and adults;
(C) individuals preparing for non-traditional fields;
(D) single parents, including single pregnant women;
(E) out-of-workforce individuals;
(F) English learners;
(G) homeless individuals described in section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
(H) youth who are in, or have aged out of, the foster care system; and
(I) 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, United States Code); and
    (ii) is on active duty (as such term is defined in section 101(d)(1) of such title.

This component can be broken down into three subsections: **access, performance, and program delivery**.

1. Look at <u>participation data for students</u> from special populations and consider how to promote programs, recruit students, and provide career guidance. Strategies for inclusion include promotional materials that depict students from special populations, active recruitment of students from special populations, and career guidance that helps students from special populations choose a pathway that fits their goals and strengths.

2. Consider <u>student performance data</u> for special populations by bringing in the data disaggregation and root causes and strategies analysis conducted for the Student Performance section of the needs assessment. In consultation with stakeholders, develop plans to implement the strategies identified through the root causes and strategies analysis and measures to evaluate the progress on those strategies.

3. Consider program delivery through an equity lens. Look at the accommodations, modifications, and supportive services that are offered, and examine the curriculum, instruction, materials, and assessments for biased and discriminatory content. In addition, identify barriers to participation in work-based learning, CTSOs, and articulated credit opportunities, and the strategies for addressing those barriers. Deepen this analysis by conducting focus groups, surveys or interviews with students from special populations, their parents (if appropriate), and community-based organizations that work with special population groups. These outreach activities can help the college learn more about their needs and preferences and their perceptions of how well the programs are helping them reach their goals.

Review data collected including any notes from interviews, focus groups, or other methodologies. Discuss each of these questions. Assign a notetaker to record the discussion. The final version should be written electronically on the following form. At the end, via consensus, assign a rating and rationale to this part of the CLNA.

Materials to Review	Stakeholders and other Resources
• Promotional materials • Recruitment activities for special populations • Career guidance activities for special populations • Processes for providing accommodations, modifications, and supportive services for special populations • Information on accelerated credit and credentials available for special populations • Procedures for work-based learning for special populations • Data on participation and performance for students from special populations • Findings from the root causes and strategies analysis from the Student Performance component • Findings from surveys/focus groups with students, parents (if applicable), and community organizations that represent special populations	https://www.ncperkins.org/data/ NC Perkins Core Indicators of Performance Institutional Effectiveness Staff & Registrar. Specifically, the Curriculum Registration, Progress, Financial Aid Report (CRPFA) NCCCS System Office of the President/ Research Performance Management National Alliance for Partnerships in Equity (NAPE) Program Improvement Process for Equity All stakeholders required by law (see §134(d) on page 36 of this guide.

**Youth is defined pursuant to the WIOA definition as 16-24 years old.*

Strategies for this section include having your work group or a focus group to review the data. They may find it useful to conduct interviews with students and former students, parents, CTSO advisors, representatives of special populations, tribal organizations and representatives, business, industry, and community partners.

Plus – strengths, going well, want to continue
Delta – challenge, needs work, needs change, lacking

Questions to Consider	**Plus - Notes**	**Delta - Notes**
PART E: Progress Toward Improving Equity and Access		
1. Which population groups are underrepresented in your CTE programs overall? And in each program area?		
2. Which population groups are over-represented in CTE programs other than non-traditional?		
3. What are the differences between participant, concentrator* and completer data for each special population? What barriers prevent students from special populations from completing?		
4. What recruiting efforts are conducted to encourage special population students to enroll in high quality CTE programs? What seems to be effective? What seems to be producing little effect?		
5. Referring to the sections on program quality, labor market needs, and progress toward implementing programs of study, what enrollment discrepancies exist when comparing to programs that lead to high-wage, high-skill, and in-demand occupations?		
6. What accommodations, modifications and supportive		

Questions to Consider	**Plus - Notes**	**Delta - Notes**
services are available for each special population? Which are most effective? Which ones are under-utilized? How do students find out about them?		
7. Has the faculty been provided professional development in strategies to assist student learning, such as Universal Design for Learning?		

* A CTE *participant* is an individual who completes not less than one course in a career and technical education program or program of study; a CTE *concentrator* is an individual that has earned at least 12 credits within a career and technical education program of study or has completed such a program if the program encompasses fewer than 12 credits or the equivalent in total.

Use the following rating for each evaluation and action step

1 Significant gaps and/or multiple gaps exist

2 Some gaps exist and/or there is not have a concrete plan to address them

3 Very few gaps exist and there are processes in place to close the remaining gaps

4 No gaps exist

PART E: Progress Toward Improving Equity and Access		
Rating	Rationale and Potential Action Steps	Perkins V Required Activity

Merging Findings and Setting Priorities

Finishing the Perkins V Comprehensive Local Needs Assessment and beginning the local application for Perkins funds are the next steps in the process and will require input from the required partners. Be creative and use your resources to get that valuable input. It does not have to happen in a large public forum but might be more effective selecting the team leaders from each section.

Engaging stakeholders in a discussion about local and regional goals is critical as you conclude this process. Ensuring the stakeholder group understands the six required use of funds and the nine elements of the local application will be critical at this point. Armed with facts and information, the leadership team can work with the stakeholder group to do the final steps and prepare for the local application.

It is time to review your findings and prioritize the action steps identified in each section. Likely there are considerably more issues and actions than can be addressed at this time, however it is important to narrow the list of needs to a key set of actions that will have the greatest impact on the following:

- Closing performance gaps for special population groups;
- Improving program size, scope, and quality and insuring labor-market alignment;
- Improving program quality;
- Making sure you have the best and most diverse educators; and
- Removing barriers that reduce access and success.

In prioritizing the action steps, go back to the notes from your discussions and consider more broad questions from each part such as:

- Part A: Which performance areas are providing the most difficulty? For which student groups? What can be done to address those needs?
- Part B-1: Which programs are strong and need to be supported to continue to keep momentum? Which programs are struggling and need to be discontinued or reshaped to be of adequate size, scope, and quality? Are there specific components of program quality that present challenges across career areas?
- Part B-2: Are programs adequately addressing current and emerging employer needs? Will programs allow students to earn a living wage when they become employed?
- Part C: Are secondary, postsecondary, and support systems aligned to ensure students can move through the pathway without barriers or replication? Are credentials awarded to students of economic value to students and employers?
- Part D: How can you get faculty to join your staff? What support is needed to retain effective instructors?

- Part E: Which special populations are struggling the most? Are there activities to undertake that would remove barriers right away? What are long-term solutions to ensuring all students are successful?

The NCCCS Perkins staff has created a form that may be used for each Program of Study that will be funded with Perkins grant monies to summarize the needs assessment gaps and action steps. This will be submitted to the System Office with the local application. See the form on the following page.

CLNA Summary Report by Program of Study Form

College: ____

Program of Study: ____

Check all that are offered: ☐ Certificate ☐ Diploma ☐ Associates in Applied Science

Check all that are appropriate: ☐ In-Demand ☐ High Skill ☐ High Wage

Team/Stakeholders involved - must include required participants, see §134(d) (pg 36 in the CLNA guide)

Representative	Name	Institution/Position

If applicable, briefly explain gaps in each part.

A. Student performance
•
B1. Size, scope, and quality of program
•
B2. Alignment to local/regional labor market needs
•
C. Progress toward implementing 9-14 career pathways programs of study
•
D. Recruitment, retention, and training of faculty and staff
•
E. Progress toward improving access and equity for all students
•

For each gap identified above, list strategies by approved Perkins V activity that were identified to close the gap. See §135 Local Uses of Funds for additional information on approved activities.

Provide career exploration and career development activities through an organized, systemic framework
•
Provide professional development for a wide variety of CTE professionals
•
Provide within CTE the skills necessary to pursue high-skill, high-wage, or in-demand industry sectors or occupations
•
Support integration of academic skills into CTE programs
•
Plan and carry out elements that support the implementation of CTE programs and programs of study and that result in increased student achievement
•
Develop and implement evaluations of the activities funded by Perkins
•

Appendix A: Perkins V Comprehensive Needs Assessment

Perkins V Sec. 134. LOCAL APPLICATION FOR CAREER AND TECHNICAL EDUCATION PROGRAMS

(c) COMPREHENSIVE NEEDS ASSESSMENT.—

(1) IN GENERAL.--To be eligible to receive financial assistance under this part, an eligible recipient shall—

(A) conduct a comprehensive local needs assessment related to career and technical education and include the results of the needs assessment in the local application submitted under subsection(a); and

(B) not less than once every 2 years, update such comprehensive local needs assessment.

(2) REQUIREMENTS.--The comprehensive local needs assessment described in paragraph (1) shall include each of the following:

(A) An evaluation of the performance of the students served by the eligible recipient with respect to State determined and local levels of performance established pursuant to section 113, including an evaluation of performance for special populations and each subgroup described in section 1111(h)(1)(C)(ii) of the Elementary and Secondary Education Act of 1965.

(B) A description of how career and technical education programs offered by the eligible recipient are—

(i) sufficient in size, scope, and quality to meet the needs of all students served by the eligible recipient; and

(ii)

(I) aligned to State, regional, Tribal, or local in-demand industry sectors or occupations identified by the State workforce development board described in section 101 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3111)(referred to in this section as the `State board') or local workforce development board, including career pathways, where appropriate; or

(II) designed to meet local education or economic needs not identified by State boards or local workforce development boards.

(C) An evaluation of progress toward the implementation of career and technical education programs and programs of study.

(D) A description of how the eligible recipient will improve recruitment, retention, and training of career and technical education teachers, faculty, specialized instructional support personnel, paraprofessionals, and career guidance and academic counselors, including individuals in groups underrepresented in such professions.

(E) A description of progress toward implementation of equal access to high-quality career and technical education courses and programs of study for all students, including—

(i) strategies to overcome barriers that result in lower rates of access to, or performance gaps in, the courses and programs for special populations;

(ii) providing programs that are designed to enable special populations to meet the local levels of performance; and

(iii) providing activities to prepare special populations for high-skill, high-wage, or in-demand industry sectors or occupations in competitive, integrated settings that will lead to self-sufficiency.

(d) CONSULTATION.—In conducting the comprehensive needs assessment under subsection (c), and developing the local application described in subsection(b), an eligible recipient shall involve a diverse body of stakeholders, including, at a minimum—

(1) representatives of career and technical education programs in a local educational agency or educational service agency, including teachers, career guidance and academic counselors, principals and other school leaders, administrators, and specialized instructional support personnel and paraprofessionals;

(2) representatives of career and technical education programs at postsecondary educational institutions, including faculty and administrators;

(3) representatives of the State board or local workforce development boards and a range of local or regional businesses or industries;

(4) parents and students;

(5) representatives of special populations;

(6) representatives of regional or local agencies serving out-of-school youth, homeless children and youth, and at-risk youth (as defined in section 1432 of the Elementary and Secondary Education Act of 1965);

(7) representatives of Indian Tribes and Tribal organizations in the State, where applicable; and

(8) any other stakeholders that the eligible agency may require the eligible recipient to consult.

(e) CONTINUED CONSULTATION.--An eligible recipient receiving financial assistance under this part shall consult with stakeholders described in subsection(d) on an ongoing basis, as determined by the eligible agency. This may include consultation in order to—

(1) provide input on annual updates to the comprehensive needs assessment required under subsection (c)(1)(B);

(2) ensure programs of study are—

(A) responsive to community employment needs;

(B) aligned with employment priorities in the State, regional, tribal, or local economy identified by employers and the entities described in subsection(d), which may include in-demand industry sectors or occupations identified by the local workforce development board;

(C) informed by labor market information, including information provided under section 15(e)(2)(C) of the Wagner-Peyser Act (29 U.S.C. 491-2(e)(2)(C));

(D) designed to meet current, intermediate, or long-term labor market projections; and

(E) allow employer input, including input from industry or sector partnerships in the local area, where applicable, into the development and implementation of programs of study to ensure such programs of study align with skills required by local employment opportunities, including activities such as the identification of relevant standards, curriculum, industry-recognized credentials, and current technology and equipment;

(3) identify and encourage opportunities for work-based learning; and

(4) ensure funding under this part is used in a coordinated manner with other local resources.

Appendix B: Perkins V Sec. 135. Local Uses of Funds

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 needs identified in the comprehensive needs assessment described in section 134(c).

b) REQUIREMENTS FOR 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 and that—

   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, which may include—

      A) introductory courses or activities focused on career exploration and career awareness, including non-traditional fields;

      B) readily available career and labor market information, including information on—

         (i) occupational supply and demand;

         (i) educational requirements;

         (ii) other information on careers aligned to State, local, or Tribal (as applicable) economic priorities; and

         (iii) employment sectors;

      C) programs and activities related to the development of student graduation and career plans;

      D) career guidance and academic counselors that provide information on postsecondary education and career options;

      E) any other activity that advances knowledge of career opportunities and assists students in making informed decisions about future education and employment goals, including non-traditional fields; or

      F) providing students with strong experience in, and comprehensive understanding of, all aspects of an industry;

   2) provide professional development for teachers, faculty, school leaders, administrators, specialized instructional support personnel, career guidance and academic counselors, or paraprofessionals, which may include—

      A) professional development on supporting individualized academic and career and technical education instructional approaches, including the integration of academic and career and technical education standards and curricula;

      B) professional development on ensuring labor market information is used to inform the programs, guidance, and advisement offered to students, including information provided under section 15(e)(2)(C) of the Wagner-Peyser Act (29 U.S.C. 49l-2(e)(2)(C));

      C) providing teachers, faculty, school leaders, administrators, specialized instructional support personnel, career guidance and academic counselors, or paraprofessionals, as appropriate, with opportunities to advance knowledge, skills, and understanding of all aspects of an industry, including the latest workplace equipment, technologies, standards, and credentials;

D) supporting school leaders and administrators in managing career and technical education programs in the schools, institutions, or local educational agencies of such school leaders or administrators;

E) supporting the implementation of strategies to improve student achievement and close gaps in student participation and performance in career and technical education programs;

F) providing teachers, faculty, specialized instructional support personnel, career guidance and academic counselors, principals, school leaders, or paraprofessionals, as appropriate, with opportunities to advance knowledge, skills, and understanding in pedagogical practices, including, to the extent the eligible recipient determines that such evidence is reasonably available, evidence-based pedagogical practices;

G) training teachers, faculty, school leaders, administrators, specialized instructional support personnel, career guidance and academic counselors, or paraprofessionals, as appropriate, to provide appropriate accommodations for individuals with disabilities, and students with disabilities who are provided accommodations under the Rehabilitation Act of 1973 (29 U.S.C. 701 et seq.) or the Individuals with Disabilities Education Act;

H) training teachers, faculty, specialized instructional support personnel, career guidance and academic counselors, and paraprofessionals in frameworks to effectively teach students, including a particular focus on students with disabilities and English learners, which may include universal design for learning, multi-tier systems of supports, and positive behavioral interventions and support; or

I) training for the effective use of community spaces that provide access to tools, technology, and knowledge for learners and entrepreneurs, such as makerspaces or libraries;

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—

A) CTE participants at the secondary school level in meeting the challenging State academic standards adopted under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965 by the State in which the eligible recipient is located; and

B) 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, which may include—

A) a curriculum aligned with the requirements for a program of study;

B) sustainable relationships among education, business and industry, and other community stakeholders, including industry or sector partnerships in the local area, where applicable, that are designed to facilitate the process of continuously updating and aligning programs of study with skills that are in demand in the State, regional, or local economy, and in collaboration with business outreach staff in one-stop centers, as defined in section 3 of the

Workforce Innovation and Opportunity Act (29 U.S.C. 3102), and other appropriate organizations, including community-based and youth-serving organizations;

C) where appropriate, expanding opportunities for CTE concentrators to participate in accelerated learning programs (as described in section 4104(b)(3)(A)(i)(IV) of the Elementary and Secondary Education Act of 1965 (20 U.S.C. 7114(b)(3)(A)(i)(IV)), including dual or concurrent enrollment programs, early college high schools, and the development or implementation of articulation agreements as part of a career and technical education program of study;

D) appropriate equipment, technology, and instructional materials (including support for library resources) aligned with business and industry needs, including machinery, testing equipment, tools, implements, hardware and software, and other new and emerging instructional materials;

E) a continuum of work-based learning opportunities, including simulated work environments;

F) industry-recognized certification examinations or other assessments leading toward a recognized postsecondary credential;

G) efforts to recruit and retain career and technical education program teachers, faculty, school leaders, administrators, specialized instructional support personnel, career guidance and academic counselors, and paraprofessionals;

H) where applicable, coordination with other education and workforce development programs and initiatives, including career pathways and sector partnerships developed under the Workforce Innovation and Opportunity Act (29 U.S.C. 3101 et seq.) and other Federal laws and initiatives that provide students with transition-related services, including the Individuals with Disabilities Education Act;

I) expanding opportunities for students to participate in distance career and technical education and blended-learning programs;

J) expanding opportunities for students to participate in competency-based education programs;

K) improving career guidance and academic counseling programs that assist students in making informed academic and career and technical education decisions, including academic and financial aid counseling;

L) supporting the integration of employability skills into career and technical education programs and programs of study, including through family and consumer science programs;

M) supporting programs and activities that increase access, student engagement, and success in science, technology, engineering, and mathematics fields (including computer science and architecture) for students who are members of groups underrepresented in such subject fields;

N) providing career and technical education, in a school or other educational setting, for adults or out-of-school youth to complete secondary school education or upgrade technical skills;

O) 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;

P) making all forms of instructional content widely available, which may include use of open educational resources;

Q) supporting the integration of arts and design skills, when appropriate, into career and technical education programs and programs of study;

R) partnering with a qualified intermediary to improve training, the development of public-private partnerships, systems development, capacity-building, and scalability of the delivery of high-quality career and technical education;

S) support to reduce or eliminate out-of-pocket expenses for special populations participating in career and technical education, including those participating in dual or concurrent enrollment programs or early college high school programs, and supporting the costs associated with fees, transportation, child care, or mobility challenges for those special populations; or

T) other activities to improve career and technical education programs; and

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).

Appendix C: Definitions

The **Career Pathways** definition refers to the definition in the Workforce Innovation and Opportunities Act (section 3, 29 U.S.C. 3102), which states:

> The term ''career pathway'' 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 registered apprenticeships;
>
> (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.

A **Program of Study** is defined specifically in Section 3(41) of Perkins V.

> The term 'program of study' means 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 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.

The North Carolina Community College System uses the term "**Programs**" to refer to the larger classification of curriculum programs, which include 10 occupational program areas.

15 Agricultural and Natural Resources Technologies
20 Biological and Chemical Technologies
25 Business Technologies
30 Commercial and Artistic Production Technologies
35 Construction Technologies
40 Engineering Technologies
45 Health Sciences
50 Industrial Technologies
55 Public Service Technologies
60 Transport System Technologies

Appendix D : Example of a CLNA Summary Report by Program of Study

College: NCCCS Team Perkins Example

Program of Study: Health Sciences Pathway

Check all that are offered: ☐ Certificate ☐ Diploma ☒ Associates in Applied Science

Check all that are appropriate: ☒ In-Demand ☒ High Skill ☒ High Wage

Team/Stakeholders involved (Must include required participants, see NCCCS CLNA Guide page 6)

Representative	Name	Institution/Position
Post-Secondary	Patti Coultas	NCCCS CTE Coordinator
PS Administrator	Edward Rooney	CC/Dean of CTE
PS Educator	Maurice Phipps	CC/Instructor
Secondary Administrator	Joe Louis Clark	HS/Principal
Secondary Educator	John Keating	HS/Teacher
Special Populations	Steven Hawking Theo Huxtable	CC students
Service Agencies	Bill Sugarman	Vocational Rehabilitation
Career Guidance	Sally McCarthy	CC/Career Specialist
Student(s)	George, Craig, Sarah, Elise	CC/Students
Community	John Neal	District 51 Senator
Business/Industry	Doogie Howser	Regional Hospital/Doctor
Business/Industry	N. Ratched	Regional Hospital/Nurse
Workforce Development	Chris D'Elia	Economic Dev. Exec. Director
Parents	Molly Weasley Jack Torrance Helen Parr	

If applicable, briefly explain gaps in each part.

A. Student performance
• 82.11% of the students in the Health Sciences pathway achieved a GPA of 2.5 or better • 75% of students receive less than a B in Algebra • Less than 10% of health students are male • 86% Complete, however minority students do not complete at the same level as white students • There is one success coach to monitor 500 students via Aviso • 25% of students transfer from ADN to other health programs

B1. Size, scope, and quality of program
• 1 of 4 regional high schools offer CCP Programs in CNA, which leads to other health programs • Admissions has a wait list for ADN and surgical technology • Sonogram equipment is old and not used in regional hospitals
B2. Alignment to local/regional labor market needs
• Per NC Dept of Commerce Labor & Economic Analysis Division, ADN, Radiologic Technology, Dental Hygiene and Respiratory Therapists are all 5 star occupations. The region needs more ADN and Dental hygienists than complete the program • Sonogram equipment does not match industry standard
C. Progress toward implementing 9-14 career pathways programs of study
• Because biology is not a CTE program, students in the CCP CNA program do not typically get admitted into the ADN program. There is not clear alignment from CCP to ADN. • 25% of students transfer from ADN to other health programs taking additional course work in similar courses
D. Recruitment, retention, and training of faculty and staff
• 70% of faculty have been trained in high definition simulation instruction to qualify their students for clinicals. • 45% of Adjunct instructors have attended Aviso training
E. Progress toward improving access and equity for all students
• A review of recruitment materials shows that not all photos include non-traditional students. • An MOA Accessibility study has not taken place since the addition of the expanded health technology labs were created to ensure access. • 45% of instructors have taken workshops in universal design for learning instructional strategies • There is a waiting list for the 2 iPads with Text to Speech software

For each gap identified above, list strategies by approved Perkins V activity that were identified to close the gap. See §135 Local Uses of Funds for additional information on approved activities.

Provide career exploration and career development activities through an organized, systemic framework
• Partner with K-12 regional counselors to bring career exploration activities to middle schoolers, focus on males and special populations in health careers • Update recruiting Program flyers to ensure photos include a majority of non-traditional students. • Develop and distribute information on 9-14 pathways for regional counselors when they provide career exploration activities • Host health career fair at middle school. Recruit current non-traditional students and alumni to participate • Increase career exploration
Provide professional development for a wide variety of CTE professionals
• Include required professional development in future contracts • Bring in UDL Workshop and other instructional strategies • Advertise PD in instructional strategies

Provide within CTE the skills necessary to pursue high-skill, high-wage, or in-demand industry sectors or occupations
• Purchase updated sonogram equipment • Add new sections of ADN to increase enrollment • Add new sections of Surgical Technology to increase enrollment • Provide tutoring to increase numbers with 2.5 GPA, with goal of 90% • Hire another Success Coach to monitor students via Aviso • Offer Aviso workshop via webinar so adjuncts can attend when they are available • Provide tutors in math
Support integration of academic skills into CTE programs
• Provide math tutors • Ensure distribution of supports offered at college
Plan and carry out elements that support the implementation of CTE programs and programs of study and that result in increased student achievement
• Review program of study for ADN and review how CCP students can move seamlessly to program from CNA • Align courses so that students can transfer between health programs without having to retake similar courses
Develop and implement evaluations of the activities funded by Perkins
• Review Aviso data for retention, completion, and usage by all faculty and staff • Review math grades