

2024-2025

Perkins Handbook

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2024-2025 PERKINS HANDBOOK

APRIL 2024

**North Carolina Community
College System**

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Message from the Postsecondary CTE Director

Welcome to the 2024-25 program year, marking North Carolina's fifth year of Perkins V implementation across our Community Colleges. Whether you're joining us for the first time or returning, we extend a warm welcome and provide this handbook as a valuable resource for understanding Perkins V's essence and regulations.

By now, many of you are familiar with key Perkins V terms like the Comprehensive Local Needs Assessment, Work-based Learning, Special Populations, Career Development, Programs of Study, Career Pathways, equity and access, and faculty recruitment and retention. This handbook aims to assist you in effectively managing the Perkins basic grant at your community college and integrating elements of the Perkins Act into your college programs seamlessly.

Your role as Perkins primary contacts is crucial in our efforts to "Strengthen our Workforce" by nurturing academic, technical, and employability skills. We appreciate your commitment to implementing and refining the comprehensive local needs assessment, ensuring that CTE courses align with regional labor market demands while prioritizing student needs and inclusion in workforce preparation. Postsecondary credentials are key to our students' pathways to careers with sustainable wages.

As our direct link to CTE curriculum programs, together we aim to cultivate student skills through well-trained faculty and curricula aligned with regional workforce requirements. Collaboration with our K-12 partners, informing middle school students of career prospects, and facilitating connections for high school students into our 9-14 career pathways are integral to our mission. Through our extended efforts in career pathways, in collaboration with Workforce Development Boards and community partners, we seek to enhance outreach and engagement, particularly among individuals facing challenges such as disabilities, economic disadvantage, single parenthood, English language learning, homelessness, or unemployment.

Moving forward, let's explore opportunities to collaborate with initiatives like guided pathways. Perkins emphasizes career development systems at our colleges, supporting students in identifying and entering career paths, pillars of Guided Pathways. Through the comprehensive local needs assessment, we aim to serve our "Special Populations," enhance faculty credentials, and align our work with local labor market needs as we support students on their paths through efforts like tutoring and curriculum tailored to their needs, preparing them for high-skill, high-wage jobs, again a pillar in guided pathways. Continuous learning is a shared goal, guided by our performance measures of employment, transition to higher education, and earning postsecondary credentials and the option to participate in non-traditional careers "Skill Building for Tomorrow's Workforce" embodies our shared vision, achievable through collaboration with diverse stakeholders to prepare students for career paths with sustainable wages. We appreciate your dedication and collaboration with our Perkins team as we guide and support you in your daily endeavors.

Keep up the outstanding work.

Warm regards,
Bob

Introduction

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

The handbook may be modified throughout the academic year under the guidance of the Post-secondary CTE Director, with updates being announced on the NCPerkins website's homepage found at NCPerkins.org.

State Postsecondary CTE Perkins Team

NC Community College System

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The CTE Coordinators are designated to specific colleges, serving as the primary liaison for inquiries and support related to the Perkins Basic Grant for their assigned institutions as noted below.



Patti Coultas, CTE 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

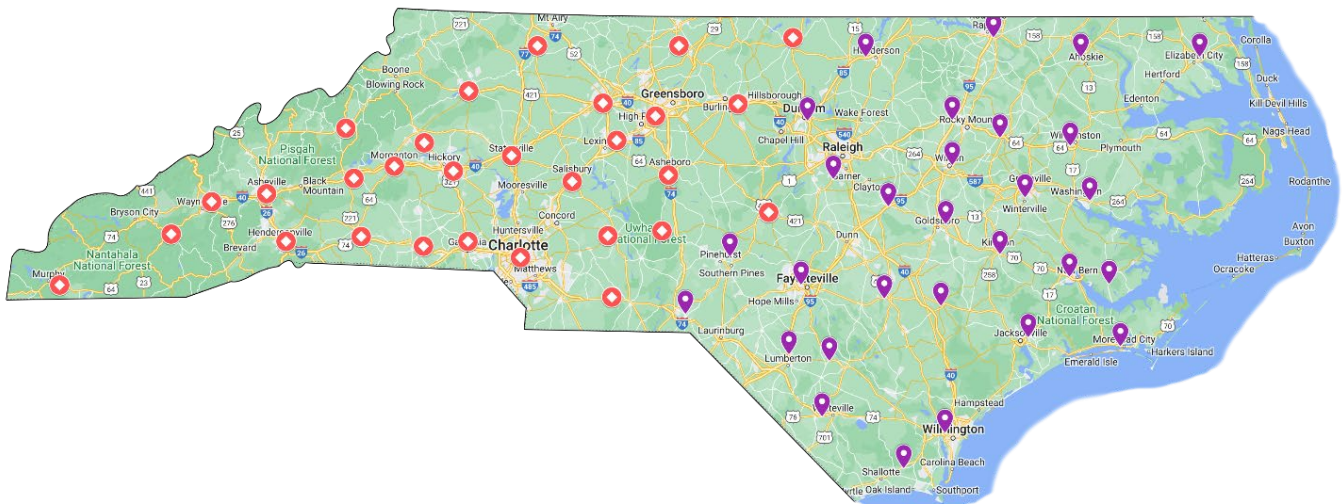
Martin Community College
 Nash Community College
 Pamlico Community College
 Pitt Community College
 Richmond Community College
 Roanoke-Chowan Community College
 Robeson Community College
 Sampson Community College
 Sandhills Community College
 Southeastern Community College
 Vance-Granville Community College
 Wake Technical Community College
 Wayne Community College
 Wilson Community College



Stefanie Schroeder, CTE 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-Davie 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



2024-2025 Timeline

The State Perkins CTE team hosts mandatory Monthly Perkins Technical Assistance Webinars. These virtual sessions take place on the second Tuesday of each month from 9:00-10:00 AM. To participate, please register and go to [NCP Perkins.org/presentations](https://www.ncperkins.org/presentations). Navigate to the desired date to find and register for each session individually.

- August 13, 2024
- September 10, 2024
- October 8, 2024
- November 12, 2024
- December 10, 2024
- January 14, 2025
- February 11, 2025
- March 11, 2025
- April 8, 2025
- May 13, 2025
- June 10, 2025
- No meeting in July.

Important Deadlines (The Moodle “course” can be found at [www.NCPerkins.org](https://www.ncperkins.org))

May 31, 2024

- Input all five essential Perkins team contacts at your college for the 2024-25 year.
- Submit signed Allotment Options and Assurances.
- Provide your college’s Local Plan and budget.
- Upload job descriptions for any position funded fully or partially by Perkins grant funds.

January 10, 2025

- Upload the locally articulated course list.
- Submit 9-14 pathways.
- Provide a Mid-Year PowerPoint with a promising practice and status update.
- Submit Mid-Year Local Plan status update.
- Submit December 31, 2024, XDBR.
- Submit semi-annual time certifications for the period of July-December 2024.

February 4-5, 2025, Mid-Year Reviews, Caraway Conference Center with an optional arrival on Feb. 3.

May 16, 2025

- Deadline for final modifications. No modifications will be accepted past May 16, 2025.
- Submit new or revised CLNAs as necessary.
- Provide negotiated Levels of Performance for 2025-26.
- Submit Year-End one-page highlight report.
- Upload final Local Plan status update.
- Submit Promising Practice Video.
- If needed, submit an updated Perkins Grant Application for the next grant cycle.

*** End-of-year in-person or virtual reviews TBD**

July 11, 2025

- Submit the final XDBR month-ending June 30, 2025.
- Provide semi-annual time certifications for January – June 2025.

Perkins V Overview

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

The purpose of the Perkins V Act is to:

1. Build on the efforts of states and localities to develop challenging academic and technical standards. This includes assisting students in meeting such standards, preparing them for high-skill, high-wage, or in-demand occupations in current or emerging professions.
2. Promote the development of services and activities that integrate rigorous and challenging academic career and technical instruction. These activities should also link secondary education and postsecondary education for participating career and technical education students.
3. Increase state and local flexibility in providing services and activities designed to develop, implement, and improve career and technical education.
4. Conduct and disseminate national research, sharing information on best practices that improve career and technical education programs and programs of study, services, and activities.
5. Provide technical assistance that:
 - A. Promotes leadership, initial preparation, and professional development at the state and local levels.
 - B. Improves the quality of career and technical education teachers, faculty, administrators, and counselors.
6. Supports 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. Offer individuals 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.
8. Increase employment opportunities for populations who are chronically unemployed or underemployed, including individuals identified by Perkins V as a special population.

Governing Documents

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

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

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

Perkins emphasizes 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 the knowledge and skills needed for college and work.

Perkins CTE sits at the intersection of education, workforce development, and economic development. Perkins has strong ties with the Elementary and Secondary Education Act (ESEA), the Workforce Innovation and Opportunity Act (WIOA), and The Higher Education Act (HEA). These connections occur through 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 WIOA term *recognized postsecondary credential*, which includes industry-recognized credentials and certificates or associate degrees at the sub-baccalaureate level. Transcribed (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 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 that serve these populations.

There is an increased emphasis on **work-based learning**, which is 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 includes:

- 1P1 - 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.
- 2P1 - The percentage of CTE concentrators who receive a recognized postsecondary credential during participation in or within one year of program completion.
- 3P1 - The percentage of CTE concentrators in CTE programs that lead to non-traditional fields.

A major enhancement introduced by the new legislation is the **comprehensive local needs assessment (CLNA)**, carried out biennially. This assessment shapes the local strategy and encompasses evaluations across five critical areas:

- 1) Analysis of student achievements using performance indicators, focusing on the outcomes of special populations and various subgroups.

- 2) Evaluation of whether CTE programs are adequately expansive, comprehensive, and high-quality to fulfill the requirements of all students served by the college, and if these programs align with current labor market demands.
- 3) Examination of the advancements made in the rollout of CTE programs and programs of study.
- 4) Strategies for enhancing the recruitment, retention, and training of CTE professionals, with an emphasis on increasing diversity within these roles.
- 5) Assessment of the progress in ensuring all students have equal opportunities to access high-quality CTE courses and programs of study.

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.

To qualify for funding, the **local application** must at least comprise:

- 1) An overview of the comprehensive local needs assessment conducted.
- 2) Details on state approved CTE programs of study offered by the college.
- 3) Strategies for collaborating with local workforce boards, workforce agencies, one-stop delivery systems, and other partners to offer a range of career exploration and guidance activities.
- 4) Approaches to enhance both academic and technical skills of CTE students by integrating and strengthening the academic and CTE components of their programs.
- 5) Measures to provide activities aimed at preparing special populations for high-skill, high-wage, or in-demand careers leading to self-sufficiency, to prepare students for nontraditional fields, to ensure equal access for special populations to CTE courses and programs, and to prevent discrimination against members of special populations.
- 6) An outline of work-based learning opportunities available to CTE students and plans for collaborating with employer representatives to develop or augment such opportunities.
- 7) Information on how the college facilitates CTE students' ability to earn postsecondary credit while still in high school.
- 8) A description of efforts to support the recruitment, preparation, retention, and training, including professional development, of teachers, faculty, administrators, and specialized instructional support personnel.
- 9) A continuous improvement plan aimed at addressing any disparities or gaps in student performance from one planning year to the next.

Local (Basic Grant) funds are designated for the development, coordination, implementation, and enhancement of career and technical education programs, aligning with the requirements identified in the comprehensive local needs assessment. In essence, the distribution of local basic grants to colleges is contingent upon their local needs assessment, ensuring that the deployment of these funds is consistent with the outcomes of the comprehensive local needs assessment.

The Perkins Act mandates **six essential activities**, which must be accounted for even in the absence of specific grant funding in those domains. Colleges are required to document actions taken within each of these areas and identify the source of funding supporting them, whether it be Perkins, local/state, both, other, or none. The mandated activity areas include:

- 1) Conducting career exploration and development activities within a structured and systematic framework.
- 2) Offering professional development opportunities for CTE educators.
- 3) Ensuring CTE Programs of Study provide the skills necessary for pursuing careers in high-skill, high-wage, or in-demand industries or roles.
- 4) Facilitating the integration of academic competencies into CTE programs.
- 5) Develop a strategy to implement components that enhance the execution of CTE programs and studies, leading to improved student outcomes.
- 6) Creating and executing an evaluation plan for activities financed through Perkins.

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

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

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

Note that EDGAR is being updated in spring 2024, please check the federal website for additional guidance.

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

Allocation of the Grant

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

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

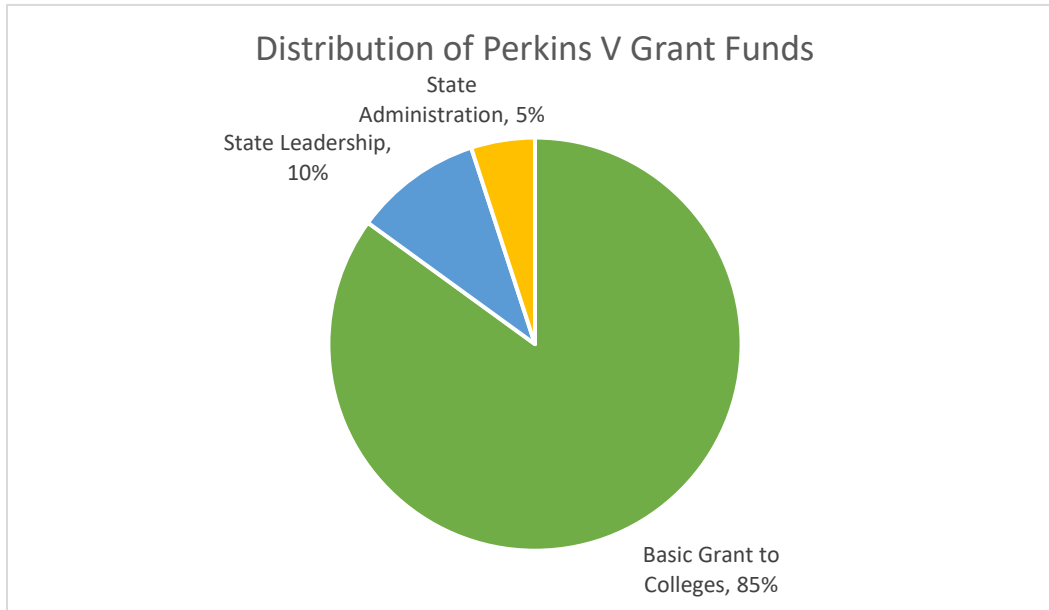
The community colleges and consortia of community colleges offering CTE programs are eligible for Perkins funds provided that the funding to be allocated through the formula-funding process is not less than \$50,000. Allocations to individual colleges are based on the percentage of postsecondary CTE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

Each spring, a **Pell Grant Information and Bureau of Indian Affairs Verification Form** is sent to the Perkins contact at each college. This form contains the number of CTE students at that college receiving Pell Grants. Colleges are responsible for reporting the number of CTE students receiving assistance from the Federal Bureau of Indian Affairs (BIA). Local Financial Aid staff usually assist in collecting this data. The formula, as dictated by the Perkins Act, is as follows: These funds are allocated based on each college's pro-rata share of Pell Grant and BIA recipients completing twelve credit hours of CORE CTE courses pursuing a credential in a CTE curriculum program about the total number of Pell Grant recipients electing to enroll in CTE programs.

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

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 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 regional CLNA. (Perkins section 131(f)).

State-Level Use of Funds



Administration

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

Leadership

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

Leadership Purpose

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

Guidelines for Leadership

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

1. A purpose consistent with the leadership goals stated above.
2. Clearly defined project goals and objectives.
3. Measurable outcomes that are supported and aligned to at least one Perkins V accountability measure.
4. The project has a detailed budget.
5. Will have oversight and technical assistance from Perkins leadership staff.
6. Will conduct and report on a project evaluation after the program year.
7. An eligible agency that receives leadership funds may not use funds for administrative costs.

Leadership Goals to improve CTE, which shall include:

- Preparation for non-traditional fields in current and emerging professions.
- Activities to support special populations.
- Expose students to high-skill, high-wage, and in-demand occupations.
- Support CTE educational opportunities for individuals with disabilities and individuals in state institutions such as corrections and juvenile justice.
- Recruiting, preparing, or retaining career and technical education teachers, faculty, specialized instructional support – pre-service, professional development, or leadership development.
- Technical assistance for eligible recipients.
- Report on the effectiveness of the use of such funds in achieving goals for preparing an educated and skilled workforce, meeting the skilled workforce needs of employers including in existing and emerging in-demand industry sectors and occupations as identified by the state, and, how the state’s Career and Technical Education programs help to meet those goals in reducing disparities or performance gaps state determined levels of performance of all CTE concentrators.

Accountability: Perkins Core Indicators of Performance

Perkins V has three accountability measures called the Core Indicators of Performance (see Section 113(b)(2)). These 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 – Curriculum certificate, diploma, or associate degree: 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.”

Annually, community colleges work with the State to set a performance target for each indicator. The NCCCS data dashboards provide visibility into each college's advancement towards these state and local objectives. Visit <https://www.nccommunitycolleges.edu/analytics/dashboards> and select CTE Perkins V from the menu to view these metrics.

Colleges that do not achieve at least 90 percent of their agreed-upon performance level for each core indicator are required to formulate an improvement plan. This plan must outline actionable steps aimed at elevating their performance. The NCCCS will assess the adequacy and relevance of these proposed plans and provide advice as needed. The progress towards the enhancement goals outlined in the plan will be tracked throughout its duration. Should a college fail to meet or demonstrate substantial progress towards the targets for two consecutive years, they may be instructed to allocate a specified portion of their Perkins funding to address the shortfall in the concerned core indicator.

Comprehensive Local Needs Assessment

To be eligible for the Perkins Basic Grant, each NC community college is required to conduct a Comprehensive Local Needs Assessment (CLNA) related to their Career and Technical Education (CTE) curriculum programs of study. This assessment is vital for identifying and addressing needs or gaps in student performance, program offerings, aligned pathways, faculty professional development, and ensuring equal access for all students, with particular attention to special population students who elect to enroll in a curriculum CTE Program of Study.

The findings from the CLNA are summarized in a CLNA Summary Form and included in the local application, documenting identified needs and gaps. The conducting of the CLNA encompasses the following components, as required by the Perkins V Act.

A. Evaluation of Student Performance

The objective of this evaluation is to rigorously assess the performance of all students enrolled in curriculum certificate, diploma, and/or Associate of Applied Science (AAS) programs of study. This evaluation aims to measure student outcomes against predetermined state and local performance indicators, including employment rates, credential attainment, and participation in non-traditional programs.

Recommended Steps for Investigation

Performance Indicators Analysis:

- Utilize the Power BI Perkins dashboards developed by the NCCCS Division of System Effectiveness to analyze student performance indicators of 1P1 (employment), 2P1 (credentials), and 3P1 (participation in non-traditional programs). The dashboards provide disaggregated data that will help in identifying performance trends and gaps among different student groups, including special populations.
- Colleges may review other available reports and analyses of student performance in CTE programs of study, paying particular attention to any noted disparities that may affect special populations.
- Evaluate how these performance outcomes align with the goals and objectives set forth by the college and the broader needs of the community and employers.

Recommended Types of Evidence Collection

Quantitative Data: Collect and analyze quantitative data from the NCCCS dashboards on student performance indicators. This includes employment rates post-graduation, credential attainment rates, and participation rates in non-traditional programs.

Qualitative Data: Supplement quantitative data with qualitative insights from new or existing program reviews, advisory board meetings, faculty feedback, and student testimonials to gain a more nuanced understanding of the factors influencing performance outcomes.

Reporting the Findings

- Based upon the analysis of the Perkins performance indicators and disaggregated data, create a concise list of identified gaps on the CLNA Summary Report.

This evaluation should serve as a foundational element of the CLNA. It will subsequently inform targeted interventions and strategic planning to improve CTE program effectiveness and student success in your Local Plan.

B. CTE Programs Evaluation

The goal of this evaluation is to analyze the alignment, effectiveness, and outcomes of curriculum CTE programs in meeting the needs of students and employers. This involves assessing program size, scope of instruction, quality of instruction, and the outcomes of program graduates, especially in state, regional, or local high-wage, high-skill, or in-demand industry sectors.

Recommended Steps for Investigation

Program Needs and Alignment Analysis:

- A. Evaluate how well CTE programs meet the current and projected needs of students and employers. Consider factors such as:
 - Size: Addresses 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. Definitions may differ on the secondary and postsecondary levels.
 - Scope: Refers 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: Addresses the college's ability to impart to students the skills and knowledge necessary for success; and or a plan for continuous improvement, as well as the presence of an advisory committee, or evidence of teacher/faculty qualifications.
- B. Examine how programs align with high-skill, high-wage, or in-demand industry sectors at the state, regional, or local level.

Program Outcomes and Graduate Success Evaluation:

- A. Analyze the outcomes of program graduates, including employment rates in relevant fields, wage levels, and further education or training pursuits. This evaluation should consider the extent to which graduates are meeting local workforce needs.

Gap Identification in Program Offerings:

- A. Utilize various sources of data, including surveys, advisory committee feedback, program reviews, institutional effectiveness evaluations, and accrediting agencies' reports, to identify gaps in program size, scope, and quality.
- B. Pay special attention to areas where program offerings may not fully align with high-skill, high-wage, or in-demand industry sectors or where improvements are needed to enhance program quality and relevance.

Recommended Types of Evidence Collection

Quantitative Data: Gather data on program enrollment, completion rates, graduate employment rates, institutional effectiveness reports, and other relevant indicators to assess program effectiveness and alignment with labor market demands.

Qualitative Data: Collect insights from faculty, students, advisory committees, and industry partners to understand the qualitative aspects of program effectiveness, including instruction quality and curriculum relevance.

Comparative Analysis: Compare CTE program offerings with labor market data and industry trends to identify mismatches or opportunities for program expansion or enhancement.

Reporting the Findings

- Based upon the analysis of the CTE program outcomes, create a concise list of identified gaps in size, scope, and quality in the CLNA Summary Report.

This part of the evaluation is a critical component of the CLNA, aimed at ensuring CTE programs are responsive to the evolving needs of students, employers, and the economy. It is the evidence to support recommendations for program adjustments, expansions, or new initiatives to better meet the needs of the workforce and ensure students are prepared for successful careers in their chosen fields.

C. CTE Programs of Study Implementation

The goal of this evaluation is to assess the integration, coherence, and alignment of CTE programs of study with secondary and postsecondary education pathways, including 9-14 pathways. This involves reviewing the existing program structures, evaluating the development and implementation of these programs, and identifying gaps or areas for improvement.

Recommended Steps for Investigation

Integration and Coherence Review:

- A. Examine the current state of integration between CTE programs at the secondary level and postsecondary education pathways. Assess the coherence of these pathways, ensuring they are a seamless and nonduplicative sequence of academic and technical content, and support a student's transition from secondary to postsecondary education.
- B. Evaluate the alignment of CTE programs with 9-14 pathways, which are designed to provide a structured transition from high school to two-year colleges and into the workforce, including articulation agreements.
- C. Consider the extent to which colleges develop sustainable relationships with students, secondary schools, businesses, industry, and other community stakeholders, including local area industry or sector partnerships, to continuously update and align programs of study with high-quality, high-wage, or in-demand skills in the state, regional, or local economy. This collaboration should involve business outreach staff in one-stop centers as defined by the Workforce Innovation and Opportunity Act (29 U.S.C. 3102) and other relevant organizations, such as community-based and youth-serving organizations.

Determine whether the updates and alignments of programs of study are effectively communicated with students, parents, and other relevant stakeholders.

Evaluate the evidence of faculty participation in pathway development and assess gaps in CTE programs that align with secondary to postsecondary pathways.

Program Development and Implementation Analysis:

- A. Review the processes involved in developing and implementing CTE programs of study. This includes assessing the involvement of faculty, industry partners, and advisory committees in program development.
- B. Identify the extent to which current programs are developed based on labor market needs, and how effectively these programs are being implemented to meet those needs.

Recommended Types of Evidence Collection

Program and Pathway Documentation: Collect and review documentation on existing CTE programs and pathways, including curriculum outlines, program development processes, and partnership agreements with secondary education institutions.

Stakeholder Feedback: Gather feedback from a diverse range of stakeholders involved in the development and implementation of CTE programs, including faculty, students, industry partners, and advisory committees. Consider how labor market trends and projections are informing the alignment of current programs with high-skills, high-wage, or in-demand skills and occupations.

Reporting the Findings

- Based upon the analysis of CTE pathways, create a concise list of identified gaps in pathways implementation in the CLNA Summary Report.

This evaluation is crucial for ensuring that CTE programs and studies are effectively aligned with educational pathways and labor market demands, facilitating a seamless transition for students from education to employment.

D. Improving CTE Faculty Recruitment, Retention, and Training

The goal of this evaluation component is to enhance CTE faculty and staff recruitment, retention, and professional development. This effort aims to ensure that educators are well-equipped to meet the needs of students and the demands of industry, with a special emphasis on increasing the representation of underrepresented groups within CTE professions.

Recommend Steps for Investigation

Recruitment and Retention Strategies Evaluation:

- A. Assess current recruitment strategies to determine their effectiveness in attracting a diverse and qualified pool of CTE faculty and staff to the extent possible. Identify challenges and barriers to recruitment and propose solutions to overcome them.
- B. Evaluate retention rates of CTE faculty and staff, identifying factors that contribute to high turnover rates, if any. Assess the impact of existing retention strategies and identify areas for improvement.
- C. Compare the demographics of the faculty and staff to the local service area.
- D. Examine recruitment, retention, and professional development practices through the lens of diversity and inclusion. Assess the effectiveness of these practices in promoting a diverse educational workforce.
- E. Propose strategies to enhance the recruitment and retention of underrepresented individuals in CTE faculty and staff, thereby enriching the learning environment for all students.

Professional Development Needs Analysis:

- Examine the professional development needs of CTE faculty and staff including content knowledge and pedagogy.
- Evaluate the relevance and accessibility of current professional development opportunities.
- Identify gaps in professional development offerings, especially in areas critical to improving CTE program quality and alignment with industry standards.
- Review the content, delivery, and outcomes of existing professional development programs to assess their effectiveness and relevance to current educational and industry needs.

Recommended Types of Evidence Collection

Quantitative: Data reports on recruitment success rates, faculty and staff turnover, and the demographics of CTE educators to identify trends and areas for improvement.

Qualitative: Documented feedback from CTE faculty and staff regarding their experiences with recruitment, retention, and professional development practices. This can include surveys, interviews, and focus group discussions.

Reporting the Findings

- Based upon the analysis of recruitment, retention, and professional development strategies, create a concise list of identified gaps in the CLNA Summary Report.

This evaluation component is crucial for building a robust and diverse cadre of CTE educators who are well-prepared to deliver high-quality, relevant, and inclusive education to all students, thereby contributing to the overall effectiveness and success of CTE programs.

E. Access to High-Quality CTE Programs

The purpose of this evaluation is to assess progress toward the implementation of equal access to high-quality Career and Technical Education (CTE) courses and programs for all students. This involves reviewing and identifying gaps in strategies, programs, and activities aimed at supporting special populations.

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 nontraditional 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. *Youth is defined pursuant to the WIOA definition as 16-24 years old. In addition, Perkins V, §114(e)(8)(B)(i) requires the inclusion of the subgroups from the Elementary and Secondary Education Act of 1965, Section 1111(c)(2)(B). There is only one that is not already included: Students from major racial and ethnic groups.

Recommended Steps for Investigation

Assessment of Strategies, Activities, and Programs to Overcome Barriers:

- B. Identify barriers to availability and access to CTE programs of study for special populations.
- C. Analyze current strategies and activities designed to support students in special populations to overcome barriers and meet local levels of performance.

- D. Identify specific programs designed to enable special populations to meet local levels of performance, which are 1P1 (employment), 2P1 (credentials), and 3P1 (participation in non-traditional programs).
- E. Review the effectiveness of the identified strategies and activities in supporting special populations to identify where gaps or barriers in access, program offerings, and program activities may exist.

Recommended Types of Evidence Collection

Quantitative Data: Gather and analyze enrollment figures, course completion rates, and performance indicators for special populations versus the general student body utilizing the data dashboard.

Qualitative Data: Utilize new or existing surveys, focus groups, or interviews with students from special populations, faculty, and program administrators to gain insights into the effectiveness of strategies, programs, and activities.

Program Reviews: Examine documentation and outcomes of existing programs and support services designed for special populations.

Activity Analysis: Review reports and evaluations of activities aimed at preparing special populations for high-skill, high-wage, or in-demand sectors.

Reporting the Findings

- Based upon the analysis of barriers, activities, and programs, create a concise list of identified gaps in equal access to high-quality CTE programs of study in the CLNA Summary Report.

This investigation should be conducted with a critical eye toward enhancing equity and inclusion within CTE programs, ensuring that all students have the opportunity to succeed and thrive in their chosen fields.

Stakeholder Engagement in the CLNA Process

For the effective execution of the CLNA and the formulation of the local application and plan, the college is required to engage a wide array of stakeholders. The importance of including diverse stakeholders in this process is to ensure comprehensive support for all students. This engagement should be facilitated through various means, including in-person and virtual meetings, results from prior college-established reviews, advisory committee meetings, surveys, and interviews. Key stakeholder groups to be involved include:

- **CTE Program Representatives:** This group should include teachers, guidance and academic counselors, chief academic officers, other school leaders, administrators, and specialized support personnel involved in the delivery of CTE programs.
- **Postsecondary Education Representatives:** Individuals representing CTE programs at postsecondary education institutions should be included to ensure the alignment of secondary and postsecondary education pathways.
- **Workforce Development Representatives:** Members from the state board and local workforce development boards, as well as representatives from a broad spectrum of local or regional businesses and industries, should be engaged to align CTE programs with labor market needs.
- **Parents and Students:** The perspectives of both parents and students are crucial for understanding the needs and aspirations of those directly impacted by CTE programs.
- **Special Populations Representatives:** Engaging representatives of special populations ensures that the needs of all student groups, including those with unique challenges, are considered in program planning.

- **Agencies Serving At-Risk Youth:** Representatives of regional and local agencies that serve homeless children and youth, and other at-risk groups as defined by the Elementary and Secondary Act of 1965, should be consulted to address the needs of these vulnerable populations.
- **Indian Tribes Representatives:** Where applicable, representatives of Indian Tribes should be involved to ensure that the educational and workforce needs of tribal communities are considered.
- **Additional Stakeholders:** Any other stakeholders deemed necessary by the eligible recipient should be consulted to provide a comprehensive range of perspectives in the CLNA process.

Continuous Consultation

Perkins staff, in collaboration with local college curriculum experts, NCCCS curriculum coordinators, and employer advisory committees, will provide ongoing support to maintain the relevance and responsiveness in strengthening CTE programs to meet community employment needs.

This ongoing support will ensure that:

- Programs of study are responsive to community employment needs.
- There is alignment with the employment priorities of the state, regional, and local economy as identified by employers and informed by labor market data.
- Programs are designed to meet current, intermediate, and long-term labor market projections.
- Employer input is integrated into the development and implementation of programs of study concerning relative standards, curriculum, industry-recognized credentials, and the use of current technology and equipment.

This structured approach to stakeholder involvement and continuous consultation is designed to ensure that CTE programs remain dynamic, and supportive in addressing the evolving needs of students, employers, and the broader community.

Local Application

For a college to be eligible for funding each college, or consortium, must complete a **local application**. Per the Act, Section 134, the local application shall cover the same period as the State Plan. Currently, this period is July 2024 through June 2028. Each college has had an application approved; however, it can be updated as needs assessments are completed or updated. The local application must include at a minimum:

- 1) A summary of the process of how the CLNA was conducted,
- 2) Identification of supported CTE programs area by a CLNA,
- 3) How the college, with the local workforce board, workforce agencies, and other partners, will provide a series of career exploration and career guidance activities,
- 4) How the college will improve the academic and technical skills of students in CTE programs by strengthening the integration of academic and CTE components,
- 5) How colleges will provide activities to prepare CTE students and those identified as special populations for high-skill, high-wage, or in-demand occupations that will lead to self-sufficiency, prepare 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 the CTE program and how the recipient will work with employer representatives to develop or expand work-based learning opportunities for CTE students,
- 7) A description of how the college will provide students participating in CTE the opportunity to gain postsecondary credit while still attending high school,
- 8) A description of how the college will work to support the recruitment, preparation, retention, and training including professional development of teachers, faculty, administrators, and specialized instructional support personnel, and
- 9) A plan for continuous improvement that addresses disparities or gaps in student performance between plan years.

Local Use of Funds

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

According to the Perkins legislation, Section 135(b)(1) through (6), colleges must conduct certain activities. See page 25 of this handbook for the required uses of funds.

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

Managing the Perkins Basic Grant at your College

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

Management of the Perkins Basic Grant consists of the following:

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

Local Process

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

- Signed **Allotment Acceptance**
- Signed Statement of **Assurances**
- **Plan** that describes activities in the six required uses 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. The plan also includes tabs for equipment, wages, and the budget.
- **Budget** that corresponds to the local plan
- **Job Descriptions** of any positions funded in full or in part by Perkins, including extra-duty contract descriptions.
- Perkins's **contact information**
- Develop **9-14 CTE Pathways**

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

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

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

- 1) Career exploration and career development activities through an organized systematic framework,
- 2) Professional development for CTE professionals,
- 3) Provide within CTE Programs of Study skills necessary to pursue high-skill, high-wage, or in-demand sectors or occupations,
- 4) Support integration of academic skills into CTE programs,
- 5) Plan to carry out elements that support the implementation of CTE programs and programs of study that result in increased student achievement, and
- 6) Develop and implement an evaluation of the activities funded by Perkins.

Special Populations

Perkins V aims to ensure equity for designated special populations by mandating the evaluation of data specific to these groups. Defined in Perkins V, §3(48), the special populations include:

1. Individuals with disabilities.
 2. Individuals from economically disadvantaged families, including those who are low-income youth and adults.
 3. Individuals training for careers in nontraditional fields.
 4. Single parents, including single pregnant women.
 5. Individuals re-entering the workforce.
 6. English language learners.
 7. Homeless individuals as defined under section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a).
 8. Youth who are in or have aged out of the foster care system.
 9. Youth with a parent who:
 - a. Serves in the armed forces, as defined in section 101(a)(4) of title 10, U.S.C.; and
 - b. Is on active duty, as defined in section 101(d)(10) of the same title.
- Furthermore, in accordance with §114(e)(8)(B)(i) of Perkins V, there is a requirement to include subgroups identified in the Elementary and Secondary Education Act of 1965, Section 1111(c)(2)(B). The only subgroup not previously mentioned is:
10. Students from major racial and ethnic groups.

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

Programs of Study / Career Pathways

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

<ul style="list-style-type: none">• 15 Agriculture & Natural Resources Technologies• 20 Biological & Chemical Technologies• 25 Business Technologies• 30 Commercial & Artistic Production Technologies• 35 Construction Technologies	<ul style="list-style-type: none">• 40 Engineering Technologies• 45 Health Sciences• 50 Industrial Technologies• 55 Public Service Technologies• 60 Transportation System Technologies
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Perkins V defines a “program of study” as a coordinated, nonduplicative sequence of academic and technical content at the secondary and postsecondary level that:

- (A) Incorporates challenging state academic standards, including those adopted by a state under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965.
- (B) Addresses both academic and technical knowledge and skills, including employability skills.
- (C) Is aligned with the needs of industries in the economy of the state, region, Tribal community, or local area.
- (D) Progress 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.
- (F) Culminates in the attainment of a recognized postsecondary credential.

Postsecondary Perkins also recognizes the WIOA definition of a career pathway (WIOA Section 3) which means a combination of rigorous and high-quality education, training, and other services that:

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

The CLNA requires that programs funded with Perkins V Basic Grant funds should have a pathway in place for the program being supported or in the process of creating a pathway.

Basic Grant Annual Plan and Budget

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

Required Uses of Funds

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

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

(b) MANDATORY ALLOCATION OF FUNDS—Funds provided to eligible recipients in this section must be employed to enhance career and technical education programs that are adequately extensive, detailed, and high-quality to be effective.

(1) Facilitate career exploration and development through a structured, systematic approach to assist students, including those in middle grades. This should occur both prior to and during enrollment in career and technical education programs, helping students make educated decisions about their future educational and career paths, as well as their chosen programs of study. For details on specific activities, refer to Perkins V.

(2) Offer professional development opportunities for educators, faculty, school leaders, administrators, specialized instructional support staff, career guidance and academic counselors, or paraprofessionals. For details on specific activities, refer to Perkins V.

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

(4) Promote the integration of academic competencies into career and technical education programs and courses of study to:

- Enable CTE participants at the secondary level to meet the rigorous academic standards set under ESEA by the state.
- Help CTE participants at the postsecondary level develop necessary academic skills.

(5) Plan and execute components that support the implementation of career and technical education programs and courses of study, aimed at boosting student achievement to meet the local performance levels established under section 113. For details on specific activities, refer to Perkins V.

(6) Develop and carry out evaluations of the initiatives funded under this part, including those necessary to fulfill the comprehensive needs assessment required under section 134(c) and the local report mandated under section 113(b)(4)(B). (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.

Local Annual Plan

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

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

Voc Code Definitions

10 Administration: As stipulated by Perkins V section 135(d), a college shall use not more than 5 percent of its allotment for **administrative expenses**. Administrative activities are those activities necessary for the effective and efficient performance of the eligible college's duties under Perkins V, including the supervision of such activities. Any cost that supports the management of the Perkins V program is administrative. 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 are 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**. Colleges must 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).

It is important to note that administrative expenses may be used only in proportion to the grant expenditure. 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. (See EDGAR, CFR Part 76.707)

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

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

13 Skill Attainment (section 135(b)(3)): Resources ensure CTE includes 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)): **Interventions** support the 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)): Funds used to plan and carry out elements that support the implementation of CTE programs and programs of study and that result in increasing student achievement of the local levels of performance established under section 113. Funds **may** be used for activities on curriculum alignment; collaborative relationships; accelerated learning programs; activities that increase student access to CTE programs; support for career and technical student organizations; support to reduce or eliminate out-of-pocket expenses for special populations participating in career and technical education; other activities to improve career and technical education programs.

New for 2024-25: Activity 15.0 must describe a work-based learning activity whether funded by Perkins or not. Additional activities focused on WBL may be included.

Perkins V, Section 3(55) Work-based learning is defined as “sustained interactions with industry or community professionals in real workplace settings, to the extent practicable, or simulated environments at an educational institution that foster in-depth, firsthand engagement with the tasks required in a given career field, that are aligned to curriculum and instruction.”

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

Note: Any activity in voc codes 17-19 is solely for tracking purposes. However, it must be linked to an activity in one of the required uses voc codes (11-16). When describing activities in voc codes 11-16, please specify which voc code in 17-19 it corresponds to.

For example: The CLNA identified a gap in career exploration activities. To address this gap, an activity providing career exploration by a career coach is stated in voc code 11. Although the funds are allocated to voc code 18, the connection to the CLNA lies in voc code 11. The description in voc code 18 should reference the career coach activity (see voc code 11).

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

18 Wages: Salary for faculty, staff, and other supportive personnel (not Administrative) (section 135(b)(5)(G)): Funds **may** be used for efforts to support salaries, recruit and retain career and technical education faculty, and staff, administrators, specialized instructional support personnel, career guidance, and academic counselors and paraprofessionals. Indicate which Voc Code activities each position is responsible for in the description. A separate tab in the plan specifically for employees is for additional information needed for monitoring.

19 Career and Technical Student Organizations (section 135(b)(5)(O)): Funds 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.

See Appendix D for the Local Plan and Budget template.

Annual Budget

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

Annual Budget Review and Approval Process

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

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

Mid-Year Update

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

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

End-of-Year Update

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

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

Planning Checklist

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

1. Does the activity address a gap or need to be identified by CLNA?

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

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

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

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

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

4. Does this activity address the “Required Uses” of Perkins funds (Perkins Act, Section 135)?

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

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

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

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

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

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

How are activities planned to address equity and special populations?

Local Plan and Budget Modifications

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

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

Budget modifications must adhere to the following:

1. **Relation to cost principles.** The cost principal requirements of EDGAR 2 CFR Part 200 Sub-part E apply.
2. **Local Plan.** When a budget modification is made, two items must be submitted in the Moodle:
 - a. A **Budget Modification form**, signed by the CFO (generally scanned/uploaded as a PDF)
 - b. The college's **Local Plan** (Excel workbook with four tabs), updated to reflect the changes.
3. **Budget changes.** Colleges shall obtain prior approval from their program coordinator whenever any of the following changes is anticipated under the Perkins grant award:
 - a. Any revision which would result in the need for additional funding.
 - b. Unless waived by the awarding agency, cumulative transfers among direct cost categories, or, if applicable, among separately budgeted programs, projects, functions, or activities that exceed or are expected to exceed 10 percent of the current total approved budget, or funding in a subcategory is insufficient, and **shall be accompanied by a narrative justification and CLNA reference for the proposed revision.**
4. **Programmatic changes.** Revision of the scope or objectives of the program requires prior approval.
5. **Final budget modifications** for the current fiscal year must be submitted no later than May 16, 2025. **Contact your CTE Coordinator if you need to request modifications past this date.**

Additional NCCCS Spending Guidance

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

1. In general, funds should be spread across programs and activities, such as salaries, equipment, work-based learning, and professional development within the guidance of the college's CLNAs.
2. **FACULTY**
Generally, a college should not use Perkins funds to support the same faculty position for more than three years, as the program becomes self-supporting at this time through FTE.
3. **NON-FACULTY POSITIONS**
Perkins may be used to pay for non-faculty (non-FTE generating) positions as long as there is a gap in their CLNA(s) that this position addresses. For example, Work-based Learning Coordinators, Career Coaches, and Program Navigators.
4. **EXTRA DUTY PAY** must be calculated on the institutional base salary for each unique contract, therefore, not everyone performing the same activity will be paid the same. §200.430(h)(2)
5. **MINI-GRANTS**
If the college implements a mini-grant system, they must ensure that the mini-grant addresses a gap or need identified in the college's CLNA(s).
6. **STUDENT CREDENTIALS**
Perkins may be used to pay for student credentials if the following criteria are met:
 - a. Industry has asked for students with this credential or training that this credential meets,
 - b. The credential addresses a need identified in the college's CLNA, and
 - c. That the college only pays for a student once. For example, if the student fails, then Perkins may not be used to pay for additional attempts at certification or for a renewal if their certification has expired.
7. **FACULTY CREDENTIALS 135(2)(c)** Perkins may be used to pay for faculty credentials if the CLNA identifies the credential is needed.

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

8. CAREER AND TECHNICAL STUDENT ORGANIZATIONS (CTSOs)

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

NCCCS has accepted the National Coordinating Council (NCC) criteria for CTSOs to be recognized and has added additional criteria for those CTSOs that may be funded using Perkins V grants by NC Community Colleges.

According to the NCC website, there are currently eight CTSOs that meet their criteria. Of those, the following five may be funded using Perkins V funds at an NC Community College:

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

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

Is a CTSO whose mission and statement of purpose include:

- a. Offer programs that are integral to the industry or occupational focus that may be associated with a career pathways program, program of study, or course.
- b. Serve CTE students and teachers in one or more of the 16 Career Clusters identified in The National Career Clusters Framework. (In NC, this would be in one of the program areas that has a code that begins with 15, 20, 25, 30, 35, 40, 45, 50, 55, and 60.)
- c. Offer programs that include employability skills, leadership activities, and training.

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

- a. Incorporation as a 501(c)(3) not-for-profit corporation in the United States.
- b. Organizing themselves into state geographic units.
- c. Having substantial representation on their board of directors from CTE educators and/or administrators.

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

- a. 20,000 or more student members 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 ten career and/or leadership development activities or competitions.

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

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

CTSO Expenditures

Allowed	Not Allowed
<ul style="list-style-type: none"> • Travel for both students and faculty • Room and Board at competitions • Student membership if the student is in a special population as a last resort (college must document) • Closet of uniforms and equipment may be purchased and lent to students. See Appendix C for US DOE guidance. * 	<ul style="list-style-type: none"> • Individual uniform items (blazers and slacks) * • Consumable supplies (welding rods, lumber, electrical wiring, etc.)

* Contact your NCCCS Perkins CTE contact if you have any questions.

Fiscal Grant Management

Overview

Each recipient of Perkins funds must follow cost guidelines outlined in the Office of Management and Budget (OMB) publication of the final Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (known as the Uniform Grants Guidance), the Perkins Act, and EDGAR. These publications discuss how to determine if an expense is reasonable and allocable and include 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

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

1. It will be presumed that supplanting has occurred where:
 - a. Colleges use Perkins funds to provide services that the college is required to make available under another federal, state, or local law; or
 - b. Colleges use Perkins funds to provide services that the college provided with non-Perkins funds in the prior year
 - c. Colleges provide services for non-CTE programs with non-federal funds and provide the same services to CTE programs using Perkins funds.
2. NCCCS provides technical assistance and training on supplanting as needed. Colleges with questions or concerns regarding supplanting or any other Perkins matters should contact their assigned program coordinator. (See Appendix B for USDOJ Supplanting guidance)

Compliance with EDGAR

Mandatory Disclosures

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

Debarred and Suspended Parties

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

Construction projects.

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

Program Income

Per 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, and 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 reasonable and allocable.
2. Conform with federal law and grant terms.
3. Consistent with state and local policies.
4. Consistently treated.
5. By 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 employees fringe benefits allocable to direct-labor employees.
- Consultant services contracted to accomplish specific grant/contract objectives.
- Travel of employees.
- Materials, supplies, and equipment purchased directly for use on a specific grant or contract.

Employees

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

- Administrative or clerical services are integral to a project or activity,
- Individuals involved can be specifically identified with the project or activity,
- Such costs are explicitly included in the budget or have the prior written approval of your Program Coordinator, and
- 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 need this?
- Is the expense targeted to a valid programmatic/administrative need?
- Is this the minimum amount I need to spend to meet my needs?
- 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 by 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 discussed with a NCCCS Perkins CTE Contact

Non-Allowable Expenditures

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

<ul style="list-style-type: none">• Alcohol• Audits except single audit• Awards and memorabilia• Contingencies• Contributions and donations• Entertainment• Expenses that supplant• Facilities• Fines and penalties• Firearms*	<ul style="list-style-type: none">• Food or beverages• Fundraising• Furniture• Giveaways• General administration apart from program administration• Individual employee 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
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* Approval may be granted by the State postsecondary CTE Director for firearms required by the NC Criminal Justice Education and Training Standards Commission for use in Basic Law Enforcement Training (BLET) courses, if the college is approved by the Commission to offer BLET and if the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) paperwork is complete.

Specific Cost Guidance by Category

The Code of Federal Regulations (CFR) contains specific cost guidance by category in **Ref: 2 CFR Part 200, §200.420 – §200.476**. These principles apply whether a cost is treated as direct or indirect. Failure to mention a particular item of cost in these sections of the CFR is not intended to imply that it is either allowable or non-allowable; rather, the 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.”

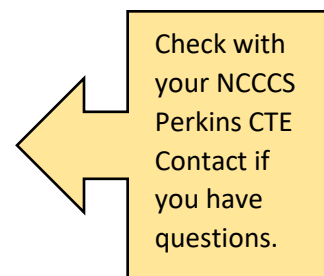
Timely Obligation of Funds

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

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

2. Every effort should be made to expend grant funds specifically for capital and non-capital purchases in the **first two quarters of the fiscal year**. This is critical to the efficient and effective use of the grant and to maximize the impact of the funds on student performance throughout the reporting year.
3. Modifications to the basic budget may be submitted throughout the fiscal year but no later than May 17th. Attention must be paid to the timing of budget amendments to ensure there must be 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 used**, 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 of the program starting. While next year’s funding can still be used to purchase the equipment before the start of classes, 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.



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 efficiently and effectively. 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 that 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 a 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, the 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, the 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 before 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, the insurance provider should be notified.

Disposition

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

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

2. Except as provided in §200.312 federally owned and exempt property, paragraph (b), or if the federal awarding agency fails to provide requested disposition instructions within 120 days, items of equipment with a current per-unit-fair-market value over \$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 the title of the property to the federal Government or to an eligible third party provided that, in such cases, the college must be entitled to compensation for its attributable percentage of the current fair market value of the property.
4. In cases where a college fails to take appropriate disposition actions, the federal awarding agency may direct the college to take disposition actions.

Employee Time and Effort

1. Time and effort reporting guidelines are specified in **2 CFR Part 200 §200.430**. All employees, including instructors, administrators, and other staff who are paid with federal funds are required to document the time and effort they spend within that program. The portion of the federally paid wages should be reflective of the time and effort the individual has put forth for that Federal program. Charges to federal awards for salaries and wages must be based on records that accurately reflect the work performed. These records must:
 - a. Be supported by a system of internal control that provides reasonable assurance that the charges are accurate, allowable, and properly allocated.
 - b. Be incorporated into the official records of the organization.
2. Employees compensated using Perkins funds are required to maintain auditable time-and-effort documentation that shows how each employee spent his or her compensated time. Such documentation is written, after the fact documenting how the time was spent (not estimated or budgeted). There are sample forms in Appendix H and on NCP Perkins.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, (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, (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 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 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 every week. The form must be submitted monthly and signed by the employee and their supervisor.

Documentation of effort should include:

- Student's program of study
- Subject area
- Time spent for each session

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

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

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

Basic Grant Monitoring

General Information

NCCCS conducts ongoing monitoring to ensure the Perkins programs at the colleges are administered correctly and in compliance with federal and state requirements. Technical assistance will be provided where requested or required. NCCCS performs “desktop” and on-site monitoring for the colleges receiving Perkins grant funds based on risk or noncompliance with federal statutes, regulations, and the terms and conditions of the sub-award 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 promptly to facilitate accurate monitoring.

Selection of Colleges

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

Risk Factors

- Meeting attendance (at required meetings, identified by a blue star in NCP Perkins.org)
- New Perkins Coordinator (less than 1 year)
- Number of employees paid by Perkins
- Missing Perkins contacts/key roles listed in the Moodle
- Large Grants (more than \$500,000)
- Missing documents or chronically late submission of documents in NCP Perkins.org

On-Site Monitoring

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

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

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

See Appendix G for the monitoring draft letter and worksheet.

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 more than 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 was responsible for CTE and non-CTE activities in their job.

Each college identified for monitoring will be sent a letter requesting a budget report (XDDBR) 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's activities and the documentation that was submitted.

Appendix A Special Populations Definitions, Data Collection Sources

Perkins V Definition	Data collection sources and definition if different
<p>Individuals with disabilities</p> <p>Perkins V §3(28)(A) An individual with any disability as defined in section 3 of the Americans with Disabilities Act of 1990 (42 U.S.C. 12102)</p>	<p>Qualified students are identified by the college's Disability Services Office in Colleague</p> <p>CFNC profile nonrequired field asks for Disability/Handicap and includes options of Blind, Deaf, Physical handicapped, Learning disability</p>
<p>Individuals from economically disadvantaged families, including low-income youth and adults</p>	<p>Not on CFNC. Perkins uses a CTE curriculum student (concentrator) who is a PELL recipient</p>
<p>Individuals preparing for nontraditional fields</p> <p>Perkins V §3(33) The term 'non-traditional fields' means occupations or fields of work, such as careers in computer science, technology, and other current and emerging high-skill occupations, for which individuals from one gender comprise less than 25 percent of the individuals employed in each such occupation or field of work.</p>	<p>CFNC required field on application is male or female.</p> <p>No Use the NAPE nontraditional crosswalk of fields to determine which programs are included. Students of the nontraditional gender who are enrolled in these programs meet this population See https://cte.ed.gov/accountability/linking-data</p>
<p>Single parents, including single pregnant women</p>	<p>Not on CFNC. Perkins uses self-identification if colleges ask students and enter it into colleague</p>
<p>Out-of-workforce individuals</p> <p>Perkins V §3(36)</p> <p>A) An individual who is a displaced homemaker, as defined in section 3 of WIOA (29 U.S.C. 3102); or</p> <p>B) And individual who –</p> <p>(i) (I) has worked primarily without remuneration to care for a home and family, and for that reason has diminished marketable skills; or,</p> <p>(II) is a parent whose youngest dependent child will become ineligible to receive assistance under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.) not later than 2 years after the date on which the parent applies for assistance under such title; and</p> <p>(ii) Is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment.</p>	<p>Not on CFNC. Perkins currently uses answers to CFNC questions asking them if they were employed (FT, PT, or not) at entry to the community college.</p>

<p>English learners Perkins V §3(22)(B) an adult or an out-of-school youth who has limited ability in speaking, reading, writing, or understanding the English language and –</p> <ul style="list-style-type: none"> i. Whose native language is a language other than English; or ii. Who lives in a family environment or community in which a language other than English is the dominant language? 	<p>CFNC nonrequired field asks what your primary language is. CFNC does not ask if they are an English Learner</p>
<p>Homeless individuals described in section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a)</p> <p>Section 725(2)(A) The term “homeless children and youths”</p> <ul style="list-style-type: none"> (A) Means individuals who lack a fixed, regular, and adequate nighttime residence (within the meaning of section 11302(a)(1) of this title); and (B) Includes – [see list of four examples of homelessness] 	<p>NC Perkins defines homeless individuals as 18 years old and under for reporting purposes. NCCCS does not include this special population in the dashboards.</p> <p>CFNC asks, “Are you a homeless individual? If you click then? it says, “An individual who lacks a permanent place to live (i.e. shelter or temporary housing facility) or lives in a location that is not typically used as a residence (i.e. bus station, campground, car, or park).”</p>
<p>Youth who are in, or have aged out of, the foster care system</p>	<p>NCCCS does not include this special population in the dashboards for reporting purposes.</p> <p>CFNC application required field asks, “Are you a youth in foster care/aged out of foster care?” Options are yes, no, choose not to respond. If you click, then? it says, “An individual who is currently in foster care or has aged out of the foster care system at age 18.”</p>
<p>Youth with a parent who –</p> <ul style="list-style-type: none"> i. Is a member of the armed forces (as such term is defined in section 101(a)(4) of title 10, U.S.C.); and ii. Is on active duty (as such term is defined in section 101(d)(1) of such title) <p>10 U.S.C. Section 101(a)(4) includes only the Army, Navy, Air Force, Marine Corps, and Coast Guard</p> <p>10 U.S.C. Section 101(d)(1) Full-time duty in the active military service of the United States. Such terms include full-time training duty, annual training duty, and attendance, while in active military service, at a school designated as a service school by law or by the Secretary of the military department</p>	<p>NCCCS does not include this special population in the dashboards for reporting purposes.</p>

<p>concerned. Such a term does not include full-time National Guard duty.</p>	
<p>Students from major racial and ethnic groups</p>	<p>CFNC application nonrequired field asks if Hispanic or Latino, or Not Hispanic or Latino If you click the? it says “Hispanic/Latino: Mexican, Puerto Rican, Cuban, Central or South American or other Spanish origin or culture, regardless of race”</p> <p>CFNC application nonrequired field offers a selection of American Indian or Alaska Native, Asian, Black, or African American, Native Hawaiian or Other Pacific Islander, or White, and allows the selection of more than one</p>

Appendix B Supplanting Guidance

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

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

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

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

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

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

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

Grant Financial Management Requirement

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

Important Information to Know

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

Scenario A: Supplanting

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

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

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

How This Applies to Your Grant

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

- ▶ Ensure that all staff understand the difference between supplementing and supplanting.
- ▶ Separately store files for each grant, with individual accounting tracking systems or spreadsheets. Funds should not be lumped into one category labeled “grants.” However, if the funds are allocated for the grant, they should be labeled accordingly.
- ▶ Ensure that budget categories (personnel, equipment, supplies, etc.) are set up for each grant award.
- ▶ Ensure that all expenses and reimbursements are consistently tracked for accuracy.
- ▶ Never use federal funds to pay for existing employees unless the existing position is “backfilled” with a new hire.
- ▶ Never use federal funds to pay for items or costs that the grantee is already obligated to pay with state, local, or tribal funds.
- ▶ Always have supporting documentation. This may include budget sheets, meeting minutes, agency memoranda, notices or orders, and any other official documents addressing the reduction in non-Federal resources.

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

Resources

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

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

About the OJP Territories Financial Support Center

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



This product was prepared under contract/call order number GS-00F-010CA/15PCFD20F00000200 awarded by the Office of Justice Programs, U.S. Department of Justice and does not constitute financial or other professional advice. The opinions, findings, and conclusions expressed in this product are those of OJP TFSC and do not represent the official position or policies of the U.S. Department of Justice.

NC DPI General Fiscal Guidance, pages 17-18

Supplement Not Supplant Requirement

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

Supplanting is presumed to occur in the following instances:

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

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

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

When using this rebuttable exception, the non-federal entity must maintain good fiscal records and documentation from their management (school board, board of directors, authorized representatives, etc.) that will permit an auditor or program monitor to conclude that they have not supplanted.

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

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

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

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

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

Appendix C US DOE CTSO Expenditure Guidance

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

Good afternoon, Anthony.

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

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

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

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

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

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

“support for career and technical student organizations, especially concerning efforts to increase the participation of students in nontraditional fields and students who are members of special populations”

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

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

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

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

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

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

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

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

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

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

Best,
José

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Appendix D Annual Local Plan and Budget

A		B		C		D		E		F		G		H		I		J		
Enter Your College's Total Allotment Below		Enter College Name Here						System Office Use Only - Plan is approved if signed by both the NCCCS CTE Coordinator and CTE Postsecondary Director.												rev 9-12-2024
1	\$					2024-2025 Local Plan & Budget														
2	\$																			
3																				
4		Remaining Balance		Perkins: Section 135(b), Required Use of Funds				CTE Coordinator		Date		CTE Postsecondary Director		Date						
5	\$																			
6	<p>Instructions: Please list the activities that addresses each of the Required Use of Funds. Note: This is a detailed plan of activities that your college intends to implement to meet the requirements of Perkins V Section 135(b).</p>																			
7		Activity Number	For each activity funded by Perkins, identify location of gap/need in CLNA	Describe activities to be conducted to address Perkins Section 135(b) requirements listed in Column A. If an activity meets more than one requirement, reference the number of the activity stated previously (i.e., same as 11.2).	Core Indicator addressed by the activity: 1P1 = Postprogram Placement 2P1 = PS Credential 3P1 = Nontraditional enrollment	Designate source of funds to be used: 1 = Perkins 2 = Local/state 3 = Both 4 = Other 5 = None needed	Specify amount of Perkins funds allocated: If the activity will be supported by Perkins funds (partially or 100%), specify the amount in this column.	Status of Activity: 1 = Planned 2 = Started 3 = Continuing 4 = Completed 5 = Added 6 = Removed	Status Update: A brief update on the status of the activity is due in January & May. If you have completed the activity, indicated the date of completion.											
8		Optional		Activities	Core Indicator(s)	Source of Funds	Perkins Amount	Status	Status Update											
9		Voc Code 10 - Administration Section 135 (b) (4) - Administrative costs charged to a basic grant used in the direct support of the programs and activities that are authorized in the local application under section 135.	10.0	NA	Administration of Perkins Grant	NA	1 = Perkins Funds													
10		Required Use		Activities	Core Indicators	Source of Funds	Perkins Amount	Status	Status Update											
11		Voc Code 11 - Organized and Systemic Career Exploration 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	11.0																	
12			11.1																	
13			11.2																	
14			11.3																	
15			11.4																	
16			11.5																	
17			11.6																	
18			11.7																	
19			11.8																	
20			11.9																	
21		Required Use		Activities	Core Indicators	Source of Funds	Perkins Amount	Status	Status Update											
22		Voc Code 12 Professional Development 135(b)(2) - provide professional development for teachers, faculty, school leaders, administrators, specialized instructional support personnel, career guidance and academic counselors, or paraprofessionals.	12.0																	
23			12.1																	
24			12.2																	
25			12.3																	
26			12.4																	
27			12.5																	
28			12.6																	
29			12.7																	
30			12.8																	
31			12.9																	
32		Required Use		Activities	Core Indicators	Source of Funds	Perkins Amount	Status	Status Update											
33		Voc Code 13 - Skill Attainment 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.	13.0																	
34			13.1																	
35			13.2																	
36			13.3																	
37			13.4																	
38			13.5																	
39			13.6																	
40			13.7																	
41			13.8																	
42			13.9																	
43		Required Use		Activities	Core Indicators	Source of Funds	Perkins Amount	Status	Status Update											
44		Voc Code 14 - Academic Integration 135(b)(4) - support integration of academic skills into career and technical education programs and programs of study	14.0																	
45			14.1																	
46			14.2																	
47			14.3																	
48			14.4																	
49			14.5																	
50			14.6																	
51			14.7																	
52			14.8																	
53			14.9																	
54		Required Use		Activities	Core Indicators	Source of Funds	Perkins Amount	Status	Status Update											
55		Voc Code 15 - Increase Student Achievement 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	15.0	Required WBL Activity (Perkins or Other funds)	1P1															
56			15.1																	
57			15.2																	
58			15.3																	
59			15.4																	
60			15.5																	
61			15.6																	
62			15.7																	
63			15.8																	
64			15.9																	
65		Required Use		Activities	Core Indicators	Source of Funds	Perkins Amount	Status	Status Update											
66		Voc Code 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 needs assessment required under section 134(c) and the local report required under section 113(b)(4)(B)	16.0																	
67			16.1																	
68			16.2																	
69			16.3																	
70			16.4																	
71			16.5																	
72			16.6																	
73			16.7																	
74			16.8																	
75			16.9																	

75	Optional		Equipment Item or program area (specific listing on equipment tab)	Core Indicators	Source of Funds	Perkins Amount	Status	Status Update
76	Voc Code 17 Equipment – appropriate equipment, technology and instructional materials (including support for library resources). MUST include a corresponding activity in a required use voc code above. Enter activity number from above in CLNA link cell. CLNA link should be indicated above in corresponding activity.	17.0	Enter required use activity number					
77		17.1	Enter required use activity number					
78		17.2	Enter required use activity number					
79		17.3	Enter required use activity number					
80		17.4	Enter required use activity number					
81		17.5	Enter required use activity number					
82		17.6	Enter required use activity number					
83		17.7	Enter required use activity number					
84		17.8	Enter required use activity number					
85	17.9	Enter required use activity number						
86	Optional		Job Title (same as Job Description)	Core Indicators	Source of Funds	Perkins Amount	Status	Status Update
87	Voc Code 18 Wages- Salary for faculty, staff and other supportive personnel (not Voc Code 10 Administrative) MUST include a corresponding activity in a required use voc code above. Enter activity number from above in CLNA link cell. CLNA link should be indicated above in corresponding activity.	18.0	Enter required use activity number					
88		18.1	Enter required use activity number					
89		18.2	Enter required use activity number					
90		18.3	Enter required use activity number					
91		18.4	Enter required use activity number					
92		18.5	Enter required use activity number					
93		18.6	Enter required use activity number					
94		18.7	Enter required use activity number					
95		18.8	Enter required use activity number					
96	18.9	Enter required use activity number						
97	Optional		Activities	Core Indicators	Source of Funds	Perkins Amount	Status	Status Update
98	Voc Code 19 Career and Technical Student organizations- support for approved CTSOs. MUST include a corresponding activity in a required use voc code above. Enter activity number from above in CLNA link cell. CLNA link should be indicated above in corresponding	19.0	Enter required use activity number					
99		19.1	Enter required use activity number					
100		19.2	Enter required use activity number					
101		19.3	Enter required use activity number					
102		19.4	Enter required use activity number					
103	19.5	Enter required use activity number						

Equipment Tab

	A	B	C	D	E
1	Enter College Name Here				
2	Equipment Request Form				
3					
4					
5	Item	Voc Code 17 Activity Number	Total Amount paid by Perkins	Quantity	Per unit Cost (Will calculate once information is entered)
6					#DIV/0!
7					#DIV/0!
8					#DIV/0!
9					#DIV/0!
10					#DIV/0!
11					#DIV/0!
12					#DIV/0!
13					#DIV/0!
14					#DIV/0!
15					#DIV/0!
16					#DIV/0!
17					#DIV/0!
18					#DIV/0!
19	Capitalized Equipment Total		\$ -		
20					
21	CHECK: Total should equal the amount in Voc Code 17 =		\$ -		
22					
23	Percentage of allotment budgeted to equipment =		#DIV/0!	Will calculate once information is entered	

Salaries & Benefits Tab

	A	B	C	D	E	F	G
1	Enter College Name Here						
2	Employees paid via Payroll with Perkins Funds						
3							
4	Position Title for each position paid through Perkins (Please match job description title)	Local Plan Voc Code 18 Activity Number	Month/Year Position was First Funded with Perkins	% of CTE Work	% paid through Perkins	Type of Time & Effort (see below)	Amount budgeted from Perkins
5							\$ -
6							\$ -
7							\$ -
8							\$ -
9							\$ -
10							\$ -
11							\$ -
12							\$ -
13							\$ -
14							\$ -
15							\$ -
16							\$ -
17	Salaries & Benefits Total						\$ -
18							
19	<i>CHECK: Total should equal amount in Voc Code 18 = \$ -</i>						
20							
21	Types of Time & Effort:						
22	100%: An employee that spends 100% of their time on CTE/Perkins approved activities and is paid 100% with Perkins funds.						
23	Partial: An employee that spends 100% of their time on CTE/Perkins approved activities and is paid partially with Perkins funds.						
24	Split: An employee that splits their time between CTE/Perkins approved and non-CTE activities and therefore is paid with Perkins Funds only for the time they spend on CTE/Perkins approved activities.						

Budget Tab

	A	B	C	D	E	F
1	Perkins V Local Budget					
2	Fiscal Period July 1, 2024 - June 30, 2025					
3						
4	College:	Enter College Name Here				
5						
6	Voc Code	Account Name				Budget
7	10	Administration				\$ -
8	11	Career Exploration				\$ -
9	12	Professional Development				\$ -
10	13	Skill Attainment				\$ -
11	14	Academic Integration				\$ -
12	15	Increase Student Achievement				\$ -
13	16	Evaluation of CTE Programs				\$ -
14	17	Equipment				\$ -
15	18	Wages				\$ -
16	19	CTSOs				\$ -
17	Total:					\$ -
18						
19	<i>"By signing this report, I certify to the best of my knowledge and belief that the report is true, complete and accurate, and the expenditures, disbursements and cash receipts are for purposes and objectives set forth in the terms and conditions of the Federal award. I am aware that any false, fictitious, or fraudulent information, or the omission of any material fact, may subject me to criminal, civil, or administrative penalties for fraud, false statements, false claims, or otherwise." - U.S. Code Title 18, Section 1001 and Title 31, Sections 3729-3730 and 3801-3812</i>					
20						
21						
22	Signature of Perkins Contact	Date	Signature of Chief Financial Officer		Date	
23						
24	To be completed by NCCCS					
25	Budget is approved if signed by both the CTE Coordinator and the CTE Postsecondary Director					
26						
27						
28	Signature of CTE Coordinator	Date	Signature of CTE Postsecondary Director		Date	

Appendix E Budget Modification Template

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

The modification form:

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

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

Approved Budget

Modification 1

Modification 2

College Name: The Witchger College of Happenstance		F	G	H
		Enter Current Budget	Enter Change Requested	Proposed Modified Budget
10	Administration	\$ 10,000.00		\$ 10,000.00
11	Career Exploration	\$ 12,000.00		\$ 12,000.00
12	Professional Development	\$ 15,000.00		\$ 15,000.00
13	Skill Attainment	\$ -		\$ -
14	Academic Integration	\$ 20,000.00		\$ 20,000.00
15	Increase Student Achievement	\$ 7,000.00		\$ 7,000.00
16	Evaluation of CTE Programs	\$ 3,000.00		\$ 3,000.00
17	Equipment	\$ 8,000.00		\$ 8,000.00
18	Wages	\$ 75,000.00		\$ 75,000.00
19	CTSO	\$ 10,000.00		\$ 10,000.00
TOTAL		\$ 160,000.00		\$ 160,000.00

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

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

Appendix F CLNA Summary Report Template

1. College:
2. Date Submitted:
4. Program Area(s):
5. Team/Stakeholders involved - must include participants relevant to the scope of the CLNA; stakeholders in Perkins legislation are recommended, §134(e) (pg 6 in the CLNA guide)

Representative	Name	Organization/Position
Secondary District CTE Director		
High School CTE Teachers		
High School Career Development Coordinator		
<i>High School -- Other</i>		
College CTE Educators		
College CTE Administrators		
College Disability Services		
<i>College -- Other</i>		
Workforce Development Board(s) Director (or designee)		
Area Employers		
Economic Development/ Industry Associations		
CTE Students		
Vocational Rehabilitation		
Department of Social Services Director (or designee)		
Indian Tribe/tribal organization (<i>if applicable</i>)		
<i>Other stakeholders</i>		

6. Briefly explain gaps in each part of the CLNA as applicable to this CLNA focus area. These gaps will directly link to activities funded on the activities/budget form.

A. Student performance
1.
B1. Size, scope, and quality of program
1.
B2. Alignment to local/regional labor market needs (<i>if applicable</i>)
1.
C. Progress toward implementing 9-14 pathways and programs of study (<i>if applicable</i>)
1.
D. Faculty and Staff recruitment, retention, and training
1.
E. Progress toward improving access and equity for all students
1.

Appendix G Monitoring Letter and Worksheet

Date
Name
College
Address
Address

Dear _____

Each year we are required to monitor colleges receiving Basic Grant Perkins Funds. **College Name** Community College has been selected for a virtual and site monitoring for the 2023-2024 program year. We are trying to schedule monitoring following your college SAC's review. As discussed in our initial phone contact, we will visit your college on at an agreed upon time and date to review your Career and Technical Education (CTE) programs. **Name of Perkins Staff**, will be leading this review.

A virtual/in person pre-monitoring discussion with your Perkins contact will take place on teams prior to the site visit.

Part One of the site visit will be a thirty-minute overview of Perkins V, the required activities and key documentation. It would be beneficial if your Chief Academic Officer, Budget Officer, CTE Deans, and College Perkins Coordinator could attend this opening meeting.

Part Two and Part Three of this review will focus on the college implementation of the Comprehensive Local Needs Assessment (CLNA), local plan, and required activities. This review will examine your college's CLNA process. As part of this review, we will look specifically at Perkins V, Section 134(c), your assessment of the performance of students served; size, scope, and quality of CTE programs; implementation of CTE programs of study; description of CTE faculty recruitment, retention, and training; progress toward implementing and equal access to high quality CTE program of study for all students including recruitment, retention, and placement; and the relationship of the CLNA to the local Perkins plan. The Perkins Act and CLNA guide will serve as a reference for the monitoring of these sections.

Part Four will be individual faculty interviews to ascertain their level of awareness of Perkins V in support of CTE programs of study funded through Perkins V.

You will be provided with an exit interview in-person or virtually as our team begins to complete the monitoring. The monitoring report will provide you with our assessment of how Perkins funds are being used at your college to enhance CTE programs of study, and any findings and recommendations for further training and/or technical assistance.

We appreciate your time and attention in this matter.

Dr. Bob Witchger
Post- Secondary CTE State Director

Perkins Staff
Position

Postsecondary Perkins V Monitoring 2023-2024 Program Year

Carl D. Perkins V, Section 134 (C.1)

Perkins V – Site Visitation

Part I Review and Basic Understanding of the Grant Documents

Discussion with the college’s Perkins Contact to ascertain the college receipt, understanding and sign off on key grant elements.

Note: This Pre-Monitoring Discussion will be conducted online to ensure the local college Perkins coordinator have a good understanding of the grant and its elements.

Element	Comment	Notes
a. Understanding and compliance with Assurances And Allotment How is it communicated to President and Board		
b. Discuss any 9-14 Pathways in place and/or Program of Study with secondary education? CCP? 9-14?		
c. Discuss How are elements of the Local Plan implemented to meet requirements of Perkins V?		
d. Budget – Overview, anticipated spending levels how the budget developed?		
e. Equipment – Look to see what is in place, is there any high-risk equipment, how is equipment being used?		
f. Position Description – are people doing activities as outlined in the position description and does the college administration and individual funded have a good understanding of the position and its relationship to the purpose, goals, and objectives of Perkins V.		

g. Discuss progress toward the integration of academic, technical, and employability skills into the CTE Program of Study		
h. Discuss Modifications rational for budget modification throughout the program year.		
i. How is the plan and budget addressing gaps discovered in the CLNA process?		
j. Midyear Review – How was the mid-year review process beneficial to you as a coordinator?		
k. End of Year Review - How was the end of year review beneficial to you as a coordinator?		
l. Comment on the Videos produced to reflect on a promising practice and help other colleges improve programming.		
m. If you have equipment or staff paid for by Perkins funds, are you prepared to present the documentation to verify spending?		
n. Was the college subject to Split Time and Effort monitoring?		
o. Was the college subject to Equipment monitoring?		

Comments:

Part II Review of the Comprehensive Local Needs Assessment

Postsecondary Perkins V Monitoring 2023-2024 Program Year

Carl D. Perkins V, Section 134 (C.1)

The 2023-24 monitoring will combine program reviews and technical assistance to determine how colleges are implementing postsecondary Perkins V at the local level and if additional technical assistance and support are needed.

This site monitoring will consist of interviews and observations with the College Perkins Contact, Deans, & Faculty. Back up documentation to support your CLNA summary will be reviewed during and after the site monitoring.

1. Student Performance in CTE programs with respect to state determined and local levels of performance Section 134 (c) (2)(A)

How are CTE students progressing on CTE Programs of Study in relationship to performance measures?

Data Dashboards or local data are used as a resource:

Review:

- Students enrolled Program of Study Student Records
- 1P1 Students completing the program and going to higher education or are employed.
- 2P1 Students earning certificates, diplomas, and degrees by Program Area

- 3P1 Student participation in programs that are non-traditional for their gender.
- Dashboards - CTE Student GPA
- Identified Gaps in serving Special Populations in relationship to total population.

Evaluator Comments Address:

- *Overall progress and/or gaps identified in enrollment, employment, credentials, and non-traditional participation.*
 - *College plan to address gaps.*
- 2. The CTE programs offered are of sufficient size, scope, and quality to meet the identified labor market need - Section 134 (c) (B)**

Review

Is the college offering enough programs and courses in each reviewed pathway?

Is the college meeting employer and student needs for courses in the pathway?

Is the quality of instruction leading students to earn postsecondary credentials for jobs with sustainable wages?

Evaluator Comments Address:

- *How do CTE Programs of Study provide adequate number of classes and seats/space for student enrollment?*
- *How do programs/courses offered in sequence have sufficient equipment to teach the skills?*
- *Do employers feel the graduates are prepared to go to work?*
- *How does data reflect special populations students completion and placement.*
- *Are gaps evidenced in the CLNA and reflected in the Local Plan*
 - *Curriculum Standards are approved and in place*
 - *Advisory Committee Notes*
 - *Performance Data on Graduates*
 - *Employer Interviews*

3. Progress in implementing and/or enhancing high-skill, high-wage, or in-demand Programs of Study/Career Pathways that are aligned to local labor market needs Section 134 (c) (C.)

Review:

- College Programs of Study Grades 9-14 and Grades 13-14 and Career Counseling, Curriculum Approved Courses, Work-Based Learning, Job-Placement Services, engaged employers, and articulated credit within the programs of study
- Advisory Committee Notes
- College Matrix outlining Programs of Study
- College Brochures outlining Programs of Study

Evaluator Comments address:

- *How does the college enhance programs and learning outcomes to meet employer needs?*
- *How did the college determine equipment to be purchased to better prepare students to meet employer identified needs?*
- *How do advisory committees and institutional effectiveness evaluations inform programs of study?*
- *Are the CTE programs of study aligned to industry needs?*

- *To the extent possible indicate how Perkins Special populations are performing.*

4. Faculty Professional Development, Recruitment, & Retention Section 134 (c) (D)

How does the college support faculty teaching in an identified Career Pathway or Programs of Study?

What are the college strategies for faculty skill development, recruitment, and retention?

Review

- Agendas of Faculty Professional Development Workshops
- Faculty Professional Development Plans
- How are faculty supported to actively take part in subject matter associations?
- How are you using Perkins Funds to support faculty participation in faculty associations?
- Advertisements or announcements for new Faculty and Staff
- Strategies for faculty retention
- How are faculty upgrading their skills to enhance courses in the programs of study?
- How do faculty attending conferences and workshops bring information back to their colleagues?

Evaluator Comments Address:

- *Overall Faculty Professional Development*
- *Faculty credentialing to meet their programs areas.*

5. Equal Access to high-quality CTE programs of study for all students Section 134 (c) (E)

Review

How does the college identify and serve the ten identified special populations in Perkins V?

How does the college reach out to agencies serving Special Populations students enrolled in CTE programs of study?

What resources does the college provide to special population students to address their needs and promote success?

What community partnerships exist for student support and how are students informed of these services.

To the extent possible indicate how Perkins Special populations are performing

Evaluator Comments Address:

- *How are programs designed to enable special populations to meet local levels of performance?*
- *Activities and Strategies to overcome barriers in enrollment for special populations.*
- *Tutoring Programs to enable special populations to compete program.*
- *Students offered accommodations as appropriate.*
- *Meeting or input from the college's Special Populations Coordinator or equivalent.*

Comments:

Part III. Review of the Local Plan and Requirements for uses of Funds:

Each eligible recipient that received 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 local needs assessment described in section 134(c).

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. Section 135 (b) (1) 1. Provide Career exploration and career development activities through an organized systematic framework designed to aid students before enrolling and while participating in CTE programs, in making informed plans and decisions about further education and career opportunities.

Comment on how the college is implementing Career Development and include an artifact to support the activity.

2. Section 135 (b) (2) Provide professional development for teachers, faculty, schools leaders, administrators, specialized instructional support personnel, career guidance and academic counselors.

Comment on how the college is implementing Professional Development include an artifact to support the activity.

3. 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.

Comment on how the college is implementing skills mapped to Advisory Committee Recommendations and include an artifact to support the activity.

4. Section 135 (b) (4) Support integration of academic skills into career and technical education programs of study to support CTE participant at the postsecondary level in achieving academic skills.

Comment on how the college is integrating academic skills into career and technical education programs of study and include an artifact to support the activity such as curriculum standard.

5. Section 135 (b) (5) Plan and carry out elements that support the implementation of Career and technical education programs and programs of study that result in increasing student achievement of the local levels of performance.

Comment on how the college is carrying out elements that support the implementation of Career and technical education programs implementing skills mapped to Advisory Committee Recommendations and include an artifact to support the activity.

6. Section 135 (b) (6) Develop and implement evaluation of the activities carried out with funds under this part including evaluation necessary to complete the comprehensive local needs assessment.

Comment on how the college is implementing evaluation of Career and technical education programs implementing skills mapped to Advisory Committee Recommendations and include an artifact to support the activity.

Part IV. Faculty/ Staff Interviews understanding how CTE faculty are incorporated in Perkins V

Faculty Interview: Please outline Professional development activities and strategies your college has implemented with the use of Perkins and Local College funds to assist faculty in enhancing their Career and Technical Education Programs.

Address the following:

1. How is the college supporting your knowledge and skills of local industry practices?
2. How do you ensure that all aspects of industry are current and relevant in your program of study?
3. How do you improve your teaching through the use of technology?
4. How do you discover opportunities for students to engage in work-based learning including 1) exploring careers, 2) experiencing work, and 3) enhancing instruction through work experience related to classroom learning?
5. How is the college supporting your participation in faculty associations and subject specific associations.
6. How are you involved in development of 9-14 career pathways?
7. Do you have opportunities to meet with secondary partners?
8. How are you involved in the development of the comprehensive local needs assessment?
9. In your opinion what is Perkins and how does it impact your program?

Concluding Comments:

Chief Academic Officer or CTE Dean Interview: Over the past years, colleges have been working with high schools to develop, outline and communicate career pathways documented on various matrices. Tell us how Perkins funds have been used to develop new and/or enhance existing career pathways, and their elements.

Address the following:

1. How is the college building relationships between secondary and postsecondary faculty?
2. How is the college building relationships between high school and college counselors?
3. How are employers engaged in initiating and carrying out career pathways?
4. How is Career Advising informing students of these pathways?
5. How are local high school to community college CTE articulation agreements formed?
6. How are students awarded the credit for these CTE programs when they enroll in the career pathway at the College.
7. How does the college coordinate the secondary to postsecondary pathway for students in pathways?
8. What are the different strategies the college is using to infuse work-based learning into programs of study?

Concluding Comments:

Perkins Contact Interview: The federal Perkins act calls for postsecondary institutions receiving federal funds to have a plan for continuous improvement. This is reflected in our annual negotiated levels of performance around these three indicators: (1P1) Post program Placement (placement in employment or further education), (2P1) Earned Recognized Postsecondary Credential, and (3P1) Nontraditional Program Participation (concentration in program nontraditional for student's gender)

Comment on the following:

1. An initial presentation of CTE performance Measures to Senior College Leadership and to the College Board of Directors
2. How does the college communicate the CTE Performance Measures to Faculty and develop strategies for continuous improvement if needed?
3. How does the college support Faculty and Staff Professional Development around performance measures that are below the negotiated level of performance for CTE students?

Concluding Comments:

Appendix H 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 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					<i>Perkins</i>	0.00%
3	College:				<i>Other</i>	0.00%
4	Employee Name:				<i>Other</i>	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 I Moodle Tutorial



North Carolina
Community College System

NCPerkins Moodle Tutorial

April 2023



1



Purpose of NCPerkins

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

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

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

2



NCPerkins.org Landing Page (login not required)

Information includes:

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

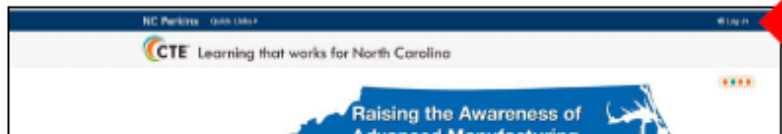
The screenshot shows the NCPerkins.org landing page with three main columns of content. Arrows from the list on the left point to specific items in these columns:

- CTE RESOURCES:**
 - Perkins Data:** Points to "Perkins Handbook" and "Comprehensive Local Needs Assessment (CLNA)".
 - Other Resources:** Points to "CTE Presentations, Webinars & Meetings".
 - Career Pathways & Programs of Study:** Points to "Perkins Grant Administration Resources".
 - Special Populations Ideas and Resources:** Points to "Time and Effort Forms".
- PERKINS GRANT GUIDANCE:** Points to "Perkins Handbook" and "Comprehensive Local Needs Assessment (CLNA)".
- PERKINS V:** Points to "Perkins Handbook" and "Comprehensive Local Needs Assessment (CLNA)".

3



Logging into your college's account



Each college has a username that starts with the beginning of their college's name.
 For example: **alamance** or **blueridge**

The login form is titled "Log in" and contains the following fields and options:

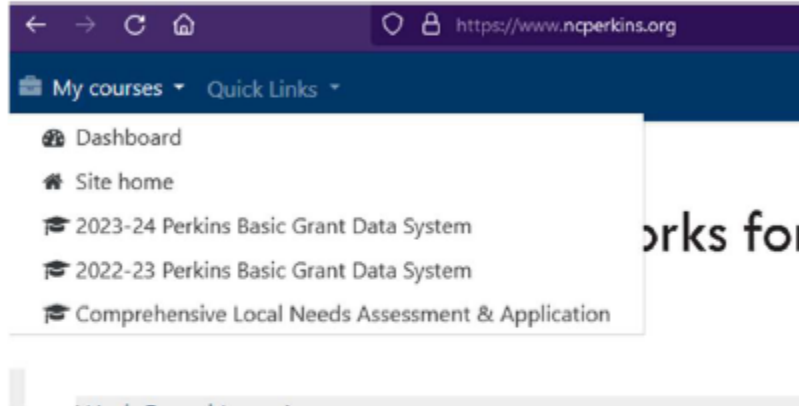
- Username:
- Password:
- Remember username
-

4



Each year has a “course”

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



5



2023-24 Course is organized by due date

▶ Open all ▼ Close all

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

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

6

Click on an arrow to open that section

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

1	▶ Due June 2, 2023 Contacts (update as needed)	Topic 1
2	▼ Due June 2, 2023	Topic 2
<p>June 2 Checklist</p> <p>Allotment Options A college must officially accept or decline its current FY allocation under the Act. Please download the form, complete it, and upload the signed form at the link below.</p> <p>Allotment Options Form</p> <p>Submit Allotment Options <input type="checkbox"/></p> <p>Assurances Please download the form, complete it, and upload the signed form at the link below.</p> <p>Assurances Form</p> <p>Submit Signed Assurances <input type="checkbox"/></p> <p>Local Plan & Budget Developing a Local Plan and budget is a critical component in implementing Perkins at the college level. Download the Local Plan and Budget Template for use in developing your plan. Once your plan is complete, upload it at the Submit Local Plan and Budget link below.</p> <p>Template for 2023-24 Local Plan and Budget</p> <p>Submit Local Plan & Signed Budget <input type="checkbox"/></p> <p>Note: Checkbox will indicate when graded.</p>		
3	▶ Due June 2, 2023 Job Descriptions (update as needed)	Topic 3

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Adding Contacts

You must enter a contact for each category, even if it is the same person.

Contacts

Enter a contact for the following roles at your college:

- Primary Perkins contact
- Chief Academic Officer
- Chief Financial Officer
- Special Populations Contact, and
- NC-NET Liaison
- Secondary Perkins Contact (optional)

[Enter Contact Information](#)

Enter Contact Information

View list [View single](#) [Search](#) [Add entry](#) [Export](#) [Templates](#) [Fields](#) [Presets](#)

No entries in database

Step 1 → 2

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Enter a new contact

2022-23 Perkins Basic Grant Data System

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

View list | View single | Search | Add entry

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

No entries in database

3

Announcements | Jump to... | Allotment Options Form

Return to: Due June 3, 202...

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Enter contact information

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

You may enter more than one contact for each role.

Enter Contact Information Return to: Du

View list | View single | Search | Add entry

New entry

College:

Title:

First Name:

Last Name:

Job Title:

Phone:

Cellphone:

Email:

Role:

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

Save and view | Save and add another




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Editing a contact

- Select Enter Contact Information from the main course page
- Scroll down to the contact that needs editing
- Select the edit icon
- When done, select “Save and view”

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



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Navigating within the course

When the task on a page is completed in a course, you may

- return to the top of the course page by selecting the course title on the navigation toolbar (arrow A)
- go to the section the current assignment is in by selecting “Return to:” (arrow B), or
- return to the NCPerkins landing page by selecting the CTE Logo (arrow C)

NC Perkins My courses Quick Links This course Participants

CTE Learning Works for North Carolina

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

2022-23 Perkins Basic Grant Data System

Enter Contact Information Return to: Due June 3, 2022...

View list View single Search Add entry

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Using assignment templates

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



Assurances

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

- Assurances Form
- Submit Signed Assurances

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Submitting documents



Assurances

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

- Assurances Form
- Submit Signed Assurances

Submit Signed Assurances

Submission status

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

[Add submission](#)

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Drag document(s) into submission box

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

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

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View List of Assignments

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

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View list of assignments

Topic	Assignments	Due date	Submission	Grade
2021-22 Local Plan Application	Submit Alignment Options	Thursday, 14 June 2022, 10:55 PM	Submitted for grading	-
	Submit Signed Assurances	Thursday, 14 June 2022, 10:33 PM	Submitted for grading	-
	Submit Local Plan & Signed Budget	-	Submitted for grading	Approved
	Submit Job Descriptions & Justifications	-	Submitted for grading	-
Local Plan & Budget Management	Submit a Local Plan & Budget Modification Request	-	Submitted for grading	Approved
	Submit PowerPoint/outline for Mid-Year Presentation - Due 1 week before your presentation date	-	Submitted for grading	99.00
	Submit 2nd Quarter Local Plan Update - Due January 18, 2022	Thursday, 17 January 2022, 12:00 AM	Submitted for grading	Approved
	Submit December 31, 2021 XDRR - Due January 15, 2022	-	Submitted for grading	-
	Submit Semi-Annual Time Certification (July-December 2021) - Due January 15, 2022	Saturday, 12 March 2022, 12:00 AM	Submitted for grading	-
	Submit Perkins Year-End One-Page Highlight Report - Due May 21, 2022	-	No submission	-

Submitted and graded

No submission? Is it overdue?

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2023-24 is organized by due date

Topic	Assignments	Due date	Submission	Grade
Due June 3, 2022	Submit Alignment Options	Friday, 3 June 2022, 11:59 PM	0	-
	Submit Signed Assurances	Friday, 3 June 2022, 11:59 PM	0	-
	Submit Local Plan & Signed Budget	Friday, 3 June 2022, 11:59 PM	0	-
	Submit Job Descriptions & Justifications (as needed)	-	0	-
Due as needed: Budget and Plan Application	Submit a Local Plan & Budget Modification Request	-	-	-
Due January 13, 2022	Submit your most recent locally articulated course list	Friday, 13 January 2022, 11:59 PM	0	-
	Submit 9-14 Pathways here.	Friday, 13 January 2022, 11:59 PM	0	-
	Submit Mid-Year Local Plan Update	Friday, 13 January 2022, 11:59 PM	0	-
	Submit Semi-Annual Time Certification (July-December 2021)	Friday, 13 January 2022, 11:59 PM	0	-
	Submit December 31, 2022 XDRR	Friday, 13 January 2022, 11:59 PM	0	-
	Submit PowerPoint/outline for Mid-Year Presentation	Friday, 13 January 2022, 11:59 PM	0	-
Due May 19, 2022	Submit Proposed 2023-24 Levels of Performance	Friday, 19 May 2022, 11:59 PM	0	-
	Submit Final Local Plan Update	Friday, 19 May 2022, 11:59 PM	0	-
	Submit Perkins Year-End One-Page Highlight Report	Friday, 19 May 2022, 11:59 PM	0	-
	Submit Working Practice Video	Friday, 19 May 2022, 11:59 PM	0	-
Due July 7, 2022	Submit June 30, 2022 XDRR	Friday, 7 July 2022, 11:59 PM	0	-
	Submit semi-annual Time certification (January 1 - June 30, 2022)	Friday, 7 July 2022, 11:59 PM	0	-

If no due date, typically will be as needed

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