

# **Carl D. Perkins Career and Technical Act of 2006 (Perkins IV)**

## **Local Education Agencies Purchasing Manual**

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OFFICE OF PUBLIC INSTRUCTION  
STATE OF MONTANA



Putting Montana Students First **A<sup>+</sup>**

## Highlights of Changes in Perkins IV

The Carl D. Perkins Act of 2006 is a continuation of funding for Vocational Education which is now referred to as Career and Technical Education (CTE). Unlike previous years, the 2006 Act requires recipients of this funding to:

- Increase accountability by setting state negotiated performance levels in reading, math, graduation, technical skills, and student placement after high school;
- Provide opportunities for professional development for CTE teachers that addresses the integration of academic and technical skills and encourage academic and CTE teachers to work together when possible;
- Develop and implement at least one Program of Study (called “Big Sky Pathways” in Montana). These programs of study must incorporate secondary education and post-secondary education elements; include academic and career and technical content in a non-duplicative progression of courses; and lead to an industry-recognized credential or certificate at the post-secondary level, or an associate or bachelor’s degree.

Additional focus is also placed on high-demand, high skill and/or high wage occupations. Employment availability and local economies should be considered in your CTE programs.

## Local Plan Checklist

Before starting the Perkins E-Grant application, you may want to bring together your CTE staff to discuss the following:

- What “Big Sky Pathways” will we offer?
  - Can we offer the appropriate courses for a sequence of courses?
  - How can we improve the academic and technical skills of CTE students?
  - How will we provide students with strong experience in all aspects of an industry?
- Determine professional development opportunities for CTE teachers to strengthen programs of study and promote academic integration.
- Discuss the role of the CTE Advisory Council and their involvement in meeting the requirements of Perkins funding.
- Who will provide career guidance and academic counseling to CTE students including linkages to future education and training opportunities?

## Local Uses of Funds (Perkins Act of 2006-Official Guide; pp.86-87)

The Perkins Law expressly states “each local recipient receiving funds under Perkins may not use more than 5% for administrative purposes”. Your school district’s Indirect Costs (IDC) is negotiated with the Office of Public Instruction.

## Required Uses of Funds:

1. Strengthen the academic and career and technical skills of students participating in CTE programs through the integration of academics with CTE programs.
2. Link CTE at the secondary level, including offering relevant elements of not less than one program of study.

3. Provide students with strong experience in and understanding of all aspects of an industry, which may include work-based learning experiences.
4. Develop, improve, or expand the use of technology in CTE, which may include training to use technology, providing students with the skills needed to enter technology fields, and encouraging schools to collaborate with technology industries to offer internships and mentoring programs.
5. Provide in-service and pre-service professional development programs to teachers, faculty, administrators, and career guidance and academic counselors who are involved in integrated CTE programs, on topics including effective integration of academics and CTE, effective teaching skills based on research, effective practices to improve parental and community involvement, effective use of scientifically based research and data to improve instruction. Professional development should also ensure that teachers and personnel stay current with all aspects of an industry; involve internship programs that provide relevant business experience; and train teachers in the effective use and application of technology.
6. Develop and implement evaluations of the CTE programs carried out with Perkins funds, including an assessment of how the needs of special populations are being met.
7. Initiate, improve, expand and modernize quality CTE programs, including relevant technology.
8. Provide services and activities that are of sufficient size, scope and quality to be effective.
9. Provide activities to prepare special populations including single parents and displaced homemakers who are enrolled in CTE programs, for high skill, high wage or high demand occupations that will lead to self-sufficiency.

#### **Permissible Uses of Funds:**

1. Involving parents, businesses and labor organizations, in the design, implementation and evaluation of CTE programs.
2. Providing career guidance and academic counseling, which may include information described in Section 118 (Perkins Act of 2006; pg. 79) for students participating in CTE programs, that improves graduation rates and provides information on post-secondary and career options, and provides assistance for postsecondary students and adults.
3. Local education and business partnerships, including work-related experiences for students, adjunct faculty arrangements for qualified industry professionals and industry experience for teachers and faculty.
4. Providing programs for special populations.
5. Assisting career and technical student organizations.
6. Mentoring and support services.
7. Leasing, purchasing, upgrading or adapting equipment, including instructional aids and publications (including support for library resources) designed to strengthen and support academic and technical skill achievement.
8. Teacher preparation programs that address the integration of academic and CTE and that assist individuals who are interested in becoming CTE teachers and faculty, including individuals with experience in business and industry.
9. Developing and expanding postsecondary program offerings at times and in formats that are accessible for all students. Including through the use of distance education.
10. Developing initiatives that facilitate the transition of sub baccalaureate career and technical education into baccalaureate degree programs, including articulation agreements, dual enrollment programs, academic and financial aid counseling and other initiatives to overcome barriers and encourage enrollment and completion.

11. Providing activities to support entrepreneurship education and training.
12. Improving or developing new CTE courses, including the development of programs of study for consideration by the state and courses that prepare individuals academically and technically for high skill, high wage or high demand occupations and dual or concurrent enrollment opportunities.
13. Developing and supporting small, personalized career-themed learning communities.
14. Providing support for family and consumer sciences programs.
15. Providing CTE programs for adults and school dropouts to complete secondary education or upgrade technical skills.
16. Providing assistance to individuals who have participated in services and activities under this Act in continuing their education or training or finding an appropriate job.
17. Supporting training and activities (such as mentoring and outreach) in nontraditional fields.
18. Pooling apportion of such funds with a portion of funds available to other recipients for innovative initiatives.
19. Supporting other CTE activities consistent with the purpose of this Act.

### **Examples of How Perkins Funds May Be Used**

To further assist each high school in determining their annual Perkins budget, the following Object Codes will be used to help with allowable/unallowable expenses. These are just examples and by no means conclusive. If you have a question regarding a specific expense, please contact your school's OPI Perkins liaison noted on the cover of this manual.

- Purchases for program areas must strengthen the academic and CTE skills of students by strengthening the academic and CTE components through a coherent sequence of courses, such as the Big Sky Pathways, the six Career Clusters, and the Career Pathways associated with the Cluster. (ACTE; Pg. 136; Sec. 135 B (1))
- Teachers must be certified and endorsed in the appropriate CTE content area.
- Funding shall supplement, and *not supplant*, non-federal funds expended for CTE programs

### **Object Codes**

The Perkins E-grant budget detail page asks you to track your proposed expenditures under the following object codes. Allowable and unallowable examples are listed under each code to provide direction. Please keep in mind this is not a comprehensive list. If you have questionable expenses, please call or e-mail your Perkins Liaison (noted above) for further guidance.

### **100 Personal Service Salaries – Salaries**

#### **Allowable:**

- Wages may be paid to a CTE counselor (Counselor's name & Job description required to ensure appropriate time is spent counseling careers)
- CTE teacher to initiate a new program of study in an emerging program area (Typical allowable number of years-3)
- CTE teacher who is acting as the chapter advisor for a CTE student organization such as BPA, DECA, FCCLA, FFA, HOSA, Skills USA, & TSA may be paid a stipend for this additional responsibility.
- Substitute teacher salary while CTE teacher is attending professional development

#### **Unallowable:**

- On-going CTE teacher salary

- General student population guidance counselor

## **200 Employee Benefits – Benefits**

- General “rule of thumb” is to determine employee retirement benefits based on the number of hours being charged to the Perkins grant.

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## **300 Purchased Professional and Technical Services – Contracted services for administrative, professional, educational, technical, and cooperative services.**

Allowable:

- An example would be payment to a Registered Nurse (RN) who is licensed with the Department of Public Health and Human Services (DPHHS) to facilitate a Nursing Assistant program at a local school
- Professional Chef teaching a culinary arts program
- Curriculum Consortia
- Electronic databases
- Technical services
- Professional Development Guest speakers, Industry speakers etc.

Unallowable:

- Professional development for all teachers that does not address CTE areas of interest

## **400 Purchased Property Services – Utilities, building usage charges, repairs and maintenance services, rent, minor construction.**

- Generally this category is considered supplanting, not supplementing normal district expenses, however, call your Perkins liaison if you would like to utilize funds in the category.

## **500 Other Purchased Services – Student travel, employee travel, professional development, registrations, communications, printing.**

Allowable:

- Transporting CTE students in specific program area to observe/participate in employment-based activities related to their area of study
- Employee travel related to training for a specific CTE program
- Leadership activities for CTE students
- CTE and academic teacher travel to attend professional development as well as registration fees associated with the professional development
- CTE-related marketing materials for students and parents explaining Big Sky Pathways and Career opportunities
- CTSO chapter advisor travel, lodging, registration when accompanying CTSO students

Unallowable:

- CTE student travel is not to be misconstrued with Career and Technical Student Organization (CTSO) travel that is not an allowable use of funds\*\*
- Social assemblage and social conventions
- Lodging, food, conveying or furnishing transportation to conventions and other gatherings of CTSO students
- Cost of non-instructional activities such as athletic, social or recreational events

- Cannot be used for academic teacher professional development or training that does not relate to CTE integration (Title IIA is a federal grant specifically for any core academic teacher to attend professional development)

\*\* Guidance on CTSO funding can be found as an attachment at the back of this document or or the non-regulatory Guidance Document from the Office of Vocation and Adult Education;  
<http://www.ed.gov/about/offices/list/ovae/pi/cte/perkins-iv-version3.pdf>

**600 Supplies** – Instructional supplies and materials, textbooks, library materials software, minor equipment up to \$4,999.00 per unit

Allowable:

- Upgrading technology in the classroom such as Smart boards, projectors, computers, software, printers, digital equipment, etc.
- Minor equipment specific to the program area such as tools, safety clothing (goggles, gloves, etc), machining equipment, ...
- Textbooks must be for new CTE programs, not ongoing textbook upgrades

Unallowable:

- Consumable items (i.e. paper, ink, groceries, welding gases or rods, lumber, nails, etc.)
- Supplies for JMG classes

**700 Property** – Capital outlay, including major construction and equipment usually>5000 (Requires Pre-Approval by the OPI Perkins Liaisons). The cost of property in this category must be deducted from the total amount of the grant before calculating indirect costs.

**800 Other Objects** – Rare-Dues, fees, student organization costs

Allowable:

- Teacher dues for professional associations such as AAFCS/MAFCS, ACTE/MTACTE, including teacher CTSO membership
- Instructional supplies, materials and equipment needed to support a student organization as an integral part of the CTE curriculum

Unallowable:

- CTSO Payment of membership dues
- Purchase of supplies, jackets and other effects of personal ownership or usage
- Purchase of awards for recognition of students, advisors or other individuals

**900 Transfers** – Transfers to other districts or cooperatives under a consortium or cooperative. (Note: The Office of Public Instruction recommends budgeting all 900 Transfers under Purpose Code 10 Instruction, rather than breaking down transfers into multiple purpose codes.) Used only for IDEA B and Preschool. NCLB/ESEA Transfers and REAP-flex handled on the Allocations page.

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- All transfers are unallowable expenses

**Additional Miscellaneous Expenses that are Unallowable:**

- Bad Debt
- Contributions or donations
- Entertainment
- Legislative expenses; i.e. lobbying expenses
- Promotional “give-away” items
- Student internships or scholarships
- Tuition for students or teachers
- Advertising (promotional items, booth space, etc.)

**References:**

*Perkins Act of 2006: The Official Guide*, (2006), ACTE: Alexandria, Virginia.

U.S. Department of Education, Grants Policy and Oversight Staff, *Education department General Administrative Regulations (EDGAR)*, Washington, D.C. 20005.

Non-Regulatory Guidance on following page



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**TO:** Educators of Career and Technical Education  
Advisors of Career and Technical Student Organizations  
District Clerks

**FROM:** T. J. Eyer, Division Administrator, Career and Technical Education  
Office of Public Instruction

**DATE:** February 20<sup>th</sup>, 2010

**SUBJECT:** Funding Guidance for Career and Technical Student Organizations (CTSOs)

The Office of Public Instruction's Career and Technical Education Division issues this guidance to provide Montana Career and Technical Educators with further information to properly implement the Carl D. Perkins Career and Technical Education Act of 2006. This information includes guidance from the Office of Vocational and Adult Education (OVAE) via a Non-Regulatory Guidance Memo received by the Office of Public Instruction on May 28<sup>th</sup>, 2009. This link has been attached to provide you access to the entire Non-Regulatory Guidance Document from OVAE; <http://www.ed.gov/about/offices/list/ovae/pi/cte/perkins-iv-version3.pdf>

In addition, the specific Question and Answer that prompted this guidance has been included for your immediate attention, as well as a more detailed guideline for all Career and Technical Student Organizations.

### ***Funding for Career and Technical Student Organizations***

D. 26 May Perkins IV funds be used to support student transportation to, and lodging and meals at, technical skill competitions as part of national career and technical student organization (CTSO) conventions?

No, except in certain limited circumstances as described in the last paragraph of this answer. The Department's long-standing interpretation regarding the types of CTSO costs that may be paid from Federal grant funds is that Perkins funds used for the support of CTSO's may not be used for lodging, feeding, conveying, or furnishing transportation to conventions or other forms of social assemblage. See 34 CFR 403.71(c) (3), originally implementing Perkins II.

Perkins funds may be used for these types of direct assistance if the costs are (1) related to a CTSO that is an integral part of the curriculum, and (2) part of a larger program to serve special populations or nontraditional student, as discussed below.

See Appendix A – Analysis of Comments and Changes at 57 FR 36825-36826 (August 14, 1992). For example, in these limited circumstances as discussed further below, an eligible recipient could use Perkins IV funds for transportation to, and lodge and meals at, a technical skills competition at a national CTSO convention for students who are members of special populations.



## **PERMISSIVE USE OF PERKINS IV FUNDS – SECTION 135**

### ***CAREER AND TECHNICAL STUDENT ORGANIZATIONS (CTSO)***

Each program is expected to have student leadership identified. In cases where schools cannot afford several student leadership organizations (FFA, HOSA, etc.) the leadership component must be identified within the CTE application.

#### **To assist career and technical student organizations:**

- ☐ Leadership activities
- ☐ Curriculum development
- ☐ Advisors
- ☐ Conferences in which the primary purpose is to disseminate technical information
- ☐ Support of student CTE organization instruction that is an integral part of the CTE Curriculum
  - ☐ Instructional supplies, materials, and equipment needed to support a student organization as an integral part of the CTE Curriculum.
- ☐ Qualified CTE educators must supervise instruction that relates to the student organization.

#### **Restrictions apply:**

- ☐ Social assemblage and social conventions
- ☐ Lodging, food, conveying or furnishing transportation to conventions and other gatherings of CTSO students
- ☐ Purchase of supplies, jackets and other effects for personal ownership or usage
- ☐ Cost of non-instructional activities such as athletic, social or recreational events
- ☐ Purchase of awards for recognition of students, advisors or other individuals; or payment of membership dues.
- ☐ See non-allowable examples within the Carl D. Perkins Act of 2006.

In response to a request from the October Montana ACTE Institute additional information about Career and Technical Student Organizations can be found on the National ACTE website <http://www.acteonline.org> . National ACTE has provided a great Reference Guide to CTSO as well as several other publications that can provide CTSO Advisors with valuable information on Allowable spending of Perkins Funds for CTSOs. The best route to find the information is to type CTSO in the search box on the main web site page. The CTSO guide is the second site listed on the resulting page.

If you have further questions about Allowable spending of Perkins Funds in support of CTSOs, please do not hesitate in contacting your State Advisor or the OPI Education Specialist for your CTSO.