

# **PERKINS REFERENCE MANUAL FOR LOCAL COORDINATORS AND STATE STAFF**

**Carl D. Perkins Career and Technical Education Act of 2006**

**Publication Date: April 2009**

**Updates noted:**

**Updated Nontraditional pathways to reflect national changes (Section 10, page 28)**

**Added Certification Reporting Module in Portal (Section 10, page 30)**

**Added Monitoring Plan (Section 11, page 31 and Appendix E)**

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## **PERKINS COORDINATOR REFERENCE MANUAL**

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**SECOND SECTION IN BOOK IS THE PERKINS FREQUENTLY ASKED QUESTIONS**

## **SECTION 1 - INTRODUCTION**

### **BACKGROUND INFORMATION**

This is a reference manual for secondary coordinators as well as the state DWE staff. It contains policies, guidance, and procedures for the secondary Perkins funding.

The Carl D. Perkins Career and Technical Education Act of 2006 is usually referred to as Perkins IV. This is the fourth reauthorization of the legislation. The first Perkins Act was passed in 1984, the second in 1990, and the third in 1998. The Act requires the state to designate a sole state agency to be responsible for the funds. In Arkansas, the State Board of Workforce Education and Career Opportunities is the sole state agency (Arkansas Code Annotated 6-11-205). The State Board operates through the Department of Workforce Education.

The Perkins Act may be accessed through the Thomas Legislative Information on the Internet website that is hosted by the U.S. Library of Congress. The website address is <http://thomas.loc.gov/> and the Act number is 109-270.

The states were allowed to submit a one-year transition plan for the first year of the Perkins IV authorization which was 2007-08. A complete five-year plan that covers the full authorization of the legislation was submitted prior to the 2008-09 fiscal year and will be in effect through the year 2012-13.

A copy of the current state plan is available on the Perkins website:  
<http://dwe.arkansas.gov/CTESCTEPerkinsInfo.htm>

### **CONTACTS**

The contact staff for questions regarding this manual is Mary Ellen Koettel, Office of Accountability and Federal Funding.

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Email: [mary.koettel@arkansas.gov](mailto:mary.koettel@arkansas.gov)

Web address of Department's home page: <http://dwe.arkansas.gov>

Secondary Career & Technical Page:

<http://dwe.arkansas.gov/CTESSecondaryCareer&TechEd.htm>

### **NEW COORDINATOR USERNAME/PASSWORD**

The annual local application and some other reports are in a web-based system that requires a username and password. All new Coordinators must have a username/password assigned by DWE to gain access to the Workforce Education Accountability Portal. The system administrator is Mary Ellen Koettel ([mary.koettel@arkansas.gov](mailto:mary.koettel@arkansas.gov)). The Portal may be accessed from the Department's home page.

## **IMPORTANT DATES TO REMEMBER**

Mid to Late April – Annual Perkins workshop

April 15 (approximately) – Link for submitting 2008-09 annual application opens.

May 15 – Annual Perkins applications submitted by May 15 are guaranteed of staff review and response by June 1. Applications submitted after May 15 will be reviewed by staff as quickly as possible. However, no funds should be obligated until the application is reviewed and approved – even if this occurs after the beginning of the fiscal year which is July 1.

May 15 (or earlier) – Open period for submitting Completers of programs of study begins.

May 31 – Deadline for submitting amendment for the current fiscal year – no extensions and no exceptions granted (regardless of the day of the week on which May 31 occurs).

June 1 – Link for submitted Expenditure Report opens. Do not submit Expenditure Report until all reimbursements are submitted and approved.

July 1 – Fiscal year begins for Perkins.

August 15 – Last day to file reimbursement requests for prior year expenditures – no extensions and no exceptions granted (regardless of the day of the week on which August 15 occurs).

August 15 – Expenditure report for prior fiscal year is due.

September 15 – Deadline for reporting completers of programs of study; portal is open from mid-May to September 15– no extensions and no exceptions granted (regardless of the day of the week on which the 15<sup>th</sup> occurs).

November 15 – Open period for submitting Placement begins.

February 15 – Deadline for reporting placement on completers; portal is open from mid-November to February 15 – no extensions and no exceptions granted (regardless of the day of the week on which the 15<sup>th</sup> occurs).

Note: In April/May of 2009 and April/May of 2011, the Department will negotiate local performance targets with all recipients for the following two-year period.

## **SECTION 2 - GRANT ALLOCATION REGULATIONS**

### **Distribution of funds**

Of the total funds that come to the state from the Perkins Act, 85% are distributed to local recipients. The remaining 15% is used at the state level for administration (5%) and leadership (10%). These funds provide salary and operation for technical assistance staff, pay the cost of the vocational student competency testing program, pay the state membership fees for national curriculum organizations, allow the state to participate in SREB's High Schools That Work initiative, etc.

Of the 85% funds that are distributed to recipients, each state determines the split of the funds between secondary and postsecondary. The split is currently 75% secondary and 25% postsecondary. As specified in the Act, postsecondary funds are distributed to institutions providing technical education of less than baccalaureate level with the distribution formula based upon Pell counts.

According to the Act, the secondary funds are to be distributed by the following formula:

- 70% on number of persons ages 5-17 who reside in each district from families with incomes below the poverty line.
- 30% on number of persons ages 5-17 who reside in each district or on the actual K-12 enrollment in districts as reported to the NCES (National Center for Educational Statistics). In Arkansas, enrollment data is used.

### **Minimum grants**

The Act states that secondary recipients that generate a grant of less than \$15,000 must join a consortium of other secondary recipients in order to operate programs and projects that are of sufficient size, scope, and quality to be effective.

Funds that are assigned to a consortium lose their identity – the consortium is to operate programs and projects that are of effective size, scope, and quality for its members.

The fiscal agent for a consortium may be a school district, an educational cooperative, or a secondary vocational center.

The state is required to have a process for local recipients to request exemptions from the consortium requirement if their grant is less than \$15,000. The waiver process is described in Appendix A.

## **SECTION 3 - CONSORTIA**

### **Governance**

A representative from each district that assigns funds to a consortium is the policy-making board for the consortium. A copy of the minimum requirements for a memorandum of understanding and assignment form for consortium members is included as Appendix B.

Section 131(f)(2) of the Perkins Career and Technical Education Act of 2006 reads as follows:

Funds allocated to a consortium formed to meet the requirements of this paragraph shall be used only for purposes and programs that are mutually beneficial to all members of the consortium and can be used only for programs authorized under this title. Such funds may not be reallocated to individual members of the consortium for purposes or programs benefiting only one member of the consortium.

A Perkins consortium is the subgrantee of the state – not the member districts of the consortium. The consortium may not reallocate funds back to member districts. Once the district funds are assigned to the consortium, the funds lose identify. Section 131(f)(1) of the Perkins Act states that the consortium must operate programs that are of sufficient size, scope, and quality to be effective.

### **Operation**

The consortium members (districts that assign funds to the consortium) are responsible for all policy decisions regarding the operation of the consortium. The executive director or other staff members of the consortium fiscal agent are not the policy makers -- the consortium member districts as a whole are responsible. This means that a board, comprised of a representative from each consortium member district, should make all policy decisions regarding the operation of the consortium. As a general observation, the educational cooperative board is NOT the same as the consortium board. Only the districts that assign funds to the consortium should have a representative on the consortium board.

One of the primary expressions of consortium policy should be the local plan. This document sets forth the consortiums overall plan of action and methods that will be used to implement the plan. That plan should be the basis for legal standing on activities undertaken by the consortium.

The state agency for Perkins (the Department of Workforce Education) has not published regulations relating to the specific operations of Perkins consortia – except guidance found in the sample memorandum of understanding (Appendix B). Each consortium is free to make the policy decisions best suited to their own local situation and in the best interest of all of the consortium members, within the confines of the Perkins Act.

One particular question that has been asked is regarding the relocation or re-claiming of equipment that was purchased with consortium funds for a member district that will be consolidating with a district outside the consortium. EDGAR 80.32(a) states that .... Title to equipment acquired under a grant or subgrant will vest upon acquisition in the grantee or subgrantee respectively. This means that the consortium board has title to any equipment

purchased with consortium funds. The consortium board must make the policy decisions regarding disposition of equipment purchased with its funds. This decision may include relocation of equipment upon consolidation -- or not.

The consortium fiscal agent retains a vested interest in the equipment for its useful life cycle (currently five years for computer equipment; seven years for all other equipment). However, the equipment may be assigned to and inventoried by the local school district. Although it is allowable for the consortium fiscal agent to inventory and manage the equipment, this may place an undue financial burden on the fiscal agent for the cost of insuring large amounts of equipment not maintained at its own physical location. Therefore, most consortium fiscal agents transfer ownership of equipment to the local districts – while maintaining a vested interest. Consortia fiscal agents must have a system in place to monitor the use of equipment purchased with Perkins funds during its useful life cycle.

### **Membership changes**

Because of the level of accountability required in Perkins IV, the state has reserved the right to limit movement into or out of a consortium by individual districts. The state plan sets forth the following policy:

After the 2008-09 fiscal year, consortium membership will remain unchanged throughout the lifecycle of Perkins IV with the following exceptions: (1) If a recipient's grant falls below the minimum required to remain outside a consortium, then the recipient will be allowed to join a consortium; however, if the recipient's performance levels cause the consortium performance to drop, the consortium may request a revision on each of the indicators negatively affected. (2) If a recipient with a grant that is above the minimum desires to join a consortium, the recipient and the consortium must agree and must prove through written documentation that the recipient's performance will not negatively impact the performance of the consortium. (3) If a consortium member receives a grant above the minimum and desires to move out of the consortium, the district/institution must prove through written documentation that this move will not negatively impact the consortium performance. If a district/institution moves in or out of a consortium for any reason other than #1, only one such move will be allowed during the lifecycle of Perkins IV.

## **SECTION 4 – LOCAL PLAN**

Each recipient must file a local plan for the use of the Perkins funds. The plan document may be updated each year if necessary through the annual application that is online. The local plan contains descriptions of how the district/consortium intends to meet the requirements of the act as well as including a set of assurances and certifications. Each recipient must address the following questions in their local plan.

### **Five-Year Plan contents**

#### **Integration and Alignment of Academic and CTE Skills**

- describe the district/consortium plans for integration and coherent sequences of courses
- explain how rigor will be used in the integration process – possibly using Smart Core
- discuss the process for the alignment of CTE frameworks with the literacy and geometry

#### **Core Academics**

- describe the career guidance process for students – and how students are encouraged/guided into challenging academic courses
- discuss how information on further education and training opportunities is provided.

#### **Academic Standards for CTE Students**

- describe the district/consortium's support for CTE programs that have the same academic standards expected in "Smart Core subject" classrooms

#### **All Aspects of Industry**

- identify specific activities such as work based learning, job shadowing, internships or apprenticeships which will provide students with experience and understanding of all aspects of an industry

#### **Programs of Study**

- describe at least one program of study that is offered that incorporates secondary and post-secondary education such as
  - an industry-recognized credential or certificate
  - an associate or baccalaureate degree
  - opportunities for secondary students to participate in dual or concurrent enrollment programs
- give examples of articulation, concurrent enrollment, apprenticeships or certifications

#### **Meeting Performance Targets**

- describe activities to meet State and local adjusted levels of performance for the performance indicators
- describe how the public will be notified of disaggregated data regarding progress of local adjusted levels of performance via local newspapers, cable stations, school Web sites, and/or public meetings.

#### **Nondiscrimination of Special Populations**

- describe how the program design will address special populations' needs to meet the local adjusted levels of performance
- describe how strategies will be identified, implemented, and sustained to overcome barriers to success and access to CTE programs.
- describe what types of activities will be provided to prepare special pops for high wage, high skill, and high demand occupations

- describe how funds will be used to promote preparation for nontraditional fields

Secondary Career Centers

- describe the support that will be provided if students do attend a center

Professional Development

- describe professional development activities for career and technical teachers, academic teachers, guidance personnel, and administrators that will
  - promote integration of CTE and academic skills
  - align academic and career/technical standards
  - incorporate teaching skills based on data and research based practices
  - involve parents and community
  - train teachers in the effective use and application of technology to improve instruction
- describe education programs for CTE teachers and other public school personnel who are involved in the direct delivery of educational services to CTE students to ensure that CTE teachers and personnel stay current with all aspects of an industry
- describe internship programs that provide relevant business experience for CTE teachers

Recruitment and Retention of CTE Teachers

- describe the district/consortium's plan to recruit and retain CTE teachers
- describe the district/consortium's plan to recruit and assist new teachers in the transition from business and industry to teaching

Use of technology

- describe activities for use of technology in CTE including:
  - training of CTE teachers and administrators
  - providing CTE students with academic and CTE skills that lead to entry into technology field
  - encouraging schools to collaborate with technology industries to offer voluntary internships and mentoring programs, including programs that improve the mathematics and science knowledge of students

Program Evaluation

- describe the process that will be used to evaluate the CTE programs and progress toward meeting the performance goals

Stakeholder Involvement

- describe how the district/consortium will address stakeholder involvement (advisory groups, councils)
- provide information that identifies the diversity of your stakeholder groups
- explain the sources for communication and timelines with stakeholders
- describe the evidence of activities/feedback/meetings which occurs with stakeholder groups
- describe the kinds of CTE activities which are available to different stakeholder groups (such as CAP conferences, Career/College days, job shadowing, etc.)
- describe the main source of general information for Perkins activities (designated person, Web site links, etc.)

The required assurances and certifications for the five-year plan are included in Appendix C.

## **SECTION 5 - ANNUAL APPLICATION AND AMENDMENTS**

### **Application**

The annual application for Perkins funds is online in the Accountability Portal. The application form for each fiscal year will open in late April – early May. Applications submitted by May 15 will be given priority and will be reviewed by June 1. All applications should be submitted by July 1 or an extension request should be submitted (see below). Any recipient who fails to submit the local plan and/or local application by September 1 or who has submitted a plan/application that is not substantially approvable by September 1 and who does not have a signed waiver from DWE or DHE allowing additional time for submission may lose the ability to file the plan and/or application.

If an application will be submitted after July 1, an extension request should be addressed to Charles Brown as follows:

Mr. Charles Brown, Deputy Director for Finance  
Arkansas Department of Workforce Education  
Three Capitol Mall  
Little Rock, AR 72201-1083  
Or email [charlie.brown@arkansas.gov](mailto:charlie.brown@arkansas.gov)  
Or fax 501.682.1507

No funds may be obligated until the annual application (and local plan if required) has been reviewed and determined to be substantially approvable.

The annual application is a planning document and must include the recipient's plan for the entire grant award for the year. All funds must be addressed in a project (with the exception of administrative cost). The application includes a section for describing the outcomes from the previous year's projects/activities. Projects that are continued include a section for describing activities accomplished in the previous year as well as modifications that may be needed from the original description. The budget summary form should accurately reflect the anticipated costs of the projects.

The annual application is a very important part of the overall state planning and monitoring for the Perkins funds. Therefore, applications that address only a portion of the grant award will not be accepted. Any recipient discovered to be deliberately and intentionally inflating the estimated costs associated with projects in an attempt to show that all the grant funds have been accounted for in the application will be placed on the list for high risk grantee status in the Perkins Risk Management Plan.

In the event that a recipient desires to submit an application for less than their grant award, an exception can be granted by the deputy director for finance. However, under no circumstances will the recipient be allowed to request additional funds during that fiscal year above those requested in the original application.

NOTE: A PowerPoint presentation is available that gives more instructions and screen shots for completing all tasks within the Portal.  
<http://dwe.arkansas.gov/CTESCTEPerkinsInfo.htm>.

## **Amendments**

Amendments to the Perkins application may be made throughout the year when unforeseen events occur. The deadline for submitting an amendment is May 31 of each fiscal year. No extension of this deadline will be allowed.

New projects or substantially amended projects should receive prior approval before implementation. Amendments are made through the Accountability Portal and are very similar to the application process.

Any time expenditures will exceed a budgeted category by more than 10%, a budget amendment must be submitted. It is recommended that the expenditures be checked against the last approved budget on a regular basis. The last day to submit a budget amendment is May 31 of each fiscal year. No extensions and no exceptions will be granted.

## **Review guidelines for staff**

**Improvement Project for Performance Indicator** – Improvement projects for a performance indicator are those projects/activities that are done to increase performance on one or more of the performance indicators. Local recipients must select one performance indicator that will be primarily affected and must measure the impact of the project on their performance for that indicator.

Questions for all readers to consider when reviewing projects:

- 1) How does the activity provide a direct link to CTE Teachers?
- 2) How does the activity promote sustained behavioral changes for teachers? Will CTE/academic teachers make long term positive teaching/classroom changes?
- 3) What data will be used to indicate that the activity increased performance on the core indicators?
- 4) If equipment is purchased, how will each piece/item increase performance on the core indicators? (Need specific information)
- 5) Has this activity been previously supported with school district funding? If it has been previously supported, it should not be funded with Perkins.
- 6) Is the school district providing this or a similar activity for non-CTE students? If so, it may be inappropriate to require Perkins to pay for it.

Program Supervisors – As a member of a review team, you should review all projects for your team – even if your particular technical/pathway area is not being addressed. Your review comments can be limited to “I have reviewed and have no concerns with this activity being approved.”

Program Managers – If these questions cannot be answered by reviewing the project and the supervisors’ review comments, you should request additional information directly from the local Perkins coordinator. Additional information from the local coordinator can be infused into the application by you in your review comments. You cannot send the application back to the local coordinator for editing, but you can accept additional information from them and enter it through your comments. If you must request additional information and there will be a substantial delay in the approval process, please notify Mary Ellen.

**Improvement of Specific Program of Study Projects** – The major questions to be considered when reviewing:

- What will this program of study look like in three years?
- How will it be different than any other program in the state?
- What skills, knowledge, experiences will be available for the program completers in three years that they do not have available now?

NOTE:

The Statement of Assurances that was submitted in the Five-Year Local Plan should be reviewed periodically by staff involved in the planning and expenditure of Perkins funds. A copy is included as Appendix C.

## **SECTION 6 - REIMBURSEMENT**

### **Reimbursement Process**

Beginning with the 2007-08 fiscal year, all payments to recipients will be done through reimbursement rather than a schedule of payments. The request for reimbursement is in the portal. Reimbursement may be requested at any time during the year as funds are expended. However, no more than 25% of the funds may be requested during the first quarter (July – September).

In order to monitor the cash management of recipients – and thus of the Department – the timing of reimbursement requests will be part of the overall risk management plan for Perkins. The state plan contains the following statements on reimbursement requests:

Any recipient that has not requested reimbursement by December 31 of each fiscal year will be contacted and its program will be assessed to ensure timely implementation of all approved projects and activities. Any recipient that has not requested reimbursement of expenditures by March 31 will be cited as a higher risk. Any recipient that holds all expenditures and requests reimbursement at the end of the fiscal year will be automatically placed on the monitoring list for the following year.

Each time a reimbursement request is submitted, the Perkins coordinator (or other district designee) must certify that the expenditures have been checked against the approved budget to ensure that no category is over-expended by more than 10%.

The last day to request reimbursement following the fiscal year is August 15. Any funds not legally obligated by June 30 and not requested by August 15 will be lost to the recipient and carried over by the state to be placed into the basic grant for redistribution to recipients according to the formula the following year.

The link to submit a reimbursement request is on the Perkins page of the Portal.

### **Staff Review**

The DWE Finance staff is responsible for the review, approval, and payment of all reimbursement requests. When a request is submitted, the Portal automatically checks the request to ensure that no more than 25% is requested during the first quarter. The Perkins coordinator will receive an error message in that event. The Portal also checks to determine the remaining funds to ensure that overpayment does not occur. Again, an error message will be generated and the request cannot be submitted. The system requires the recipient to certify that the reimbursement request is aligned with their approved budget.

The request is directed first to the deputy director for Finance (or his designee). He has access to all applications and amendments, including the budgets, and will determine the reasonableness of the amount of the request. If the district/consortium is on the high risk grantee list, he may request that the Perkins coordinator submit invoices and/or other records to document all or a portion of the reimbursement request. He will also check the list in the Portal that shows all previous requests/payments by date. The deputy director will also randomly require that recipients submit verification of the reimbursement request with the budget categories included so that he may check the request against their approved budget.

Once the deputy director has approved the reimbursement request, the Portal sends it to the accountant responsible for payment of the Perkins funds. After funds are drawn down from the federal government, they are direct deposited into the designated account of the district/consortium within three days. A notice is generated by the Portal to inform the Perkins coordinator that the request has been approved and will be reimbursed.

In addition to the Finance staff, Mary Ellen Koettel also has access to view the reimbursement requests and payments. They will review the list of requests on a quarterly basis to ensure that all recipients are implementing approved projects and requesting reimbursement on a timely basis. A progress report may be required from any recipient not requesting reimbursement within the first two quarters of the fiscal year.

**Reimbursement Form**

- **Select the correct fiscal year**
- **Explain your request** – What constitutes this request? Describe in budget categories (salary, professional development, equipment, etc.) the amounts requested and how they are related to the approved projects. Specify the project for each expenditure (Supplies: activity #2, \$xxx, Activity #3, \$xxx, Activity #5, \$xxx; Equipment: activity #2, \$xxx, Activity #6, \$xxx).

**Reimbursement Form**

<b>School Year :</b>	<input type="text" value="2008-09"/>	
<b>District</b>		<b>School District</b>
<b>LEA Number:</b>		
<b>Person Completing Request:</b>	<input type="text"/>	
<b>Phone Number:</b>	<input type="text"/>	Enter phone number with area code Ex.XXXXXXXXXX
<b>Grant Award:</b>	<b>\$21,139.00</b>	
<b>Total Previous Request:</b>	<input type="text" value="\$ 7860.99"/>	
<b>Funds Remaining:</b>	<input type="text" value="\$ 13278.01"/>	
<b>Requested Amount:</b>	<input type="text" value="\$"/>	
<b>Funds Remaining After This Request:</b>	<input type="text" value="\$ 13278.01"/>	
<b>Explanation of request:</b>	<div style="border: 1px solid gray; height: 40px; width: 100%;"></div>	

I hereby certify that these funds have been expended in accordance with our approved annual application and/or amendments and that appropriate documentation is on file in the accounting office of our district/consortium. I further assure that I have compared our expenditures against the last approved budget for these funds and that no expenditure is more than 10% over the budgeted amount for that category.

This form is completed

**SECTION 7 - ANNUAL EXPENDITURE REPORT**

The annual expenditure report is completed through the Accountability Portal. The report form is available beginning June 1 and is due August 15. No funds for the new fiscal year will be released after August 15 until this form is submitted. The Expenditure Report should not be submitted until after all reimbursement requests for the previous year are submitted. **ONCE THE EXPENDITURE REPORT IS SUBMITTED, NO FURTHER REIMBURSEMENT REQUESTS WILL BE ACCEPTED. HOWEVER, THE FINAL PAYMENT THAT WILL ZERO OUT THE RECIPIENT'S FUNDS WILL NOT BE APPROVED UNTIL THE EXPENDITURE REPORT IS SUBMITTED.**

On Part 1 of the report, enter the actual expenditures in the appropriate categories. The last approved budget amounts will automatically appear at the bottom of the form. Any category that is over-expended by more than the 10% allowable will show an amount to be repaid.

Annual Expenditure Report - Part 1 of 2  
Financial Report 2007-08

Performance Indicator	Employee Salary & Benefits	Purchased Services & Travel	Supplies and Materials	Equipment	Administrative Cost	TOTAL
Academic Skill Attainment	\$5,794.21	\$17,424.64	\$0.00	\$0.00		\$23,218.85
Technical Skill Attainment	\$0.00	\$24,189.93	\$9,319.30	\$3,185.74		\$36,694.97
Graduation	\$0.00	\$0.00	\$0.00	\$0.00		\$0.00
Completion of Programs of Study	\$0.00	\$0.00	\$0.00	\$0.00		\$0.00
Placement	\$0.00	\$0.00	\$0.00	\$0.00		\$0.00
Nontraditional Participation	\$0.00	\$0.00	\$0.00	\$0.00		\$0.00
Nontraditional Completion	\$0.00	\$0.00	\$0.00	\$0.00		\$0.00
Administrative					\$0.00	
<b>Total Expenditure</b>	\$5,794.21	\$41,614.57	\$9,319.30	\$3,185.74	\$0.00	\$59,913.82

<b>Last Approved Budget Amount</b>	\$7,435.00	\$45,415.00	\$10,970.00	\$3,185.00	\$0.00	\$67,005.00
<b>Difference</b>	-\$1,640.79	-\$3,800.43	-\$1,650.70	\$0.74	\$0.00	-\$7,091.18

<b>Amount to be Repaid</b>	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
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The total expenditures on this report should equal the total reimbursements requested.

Part 2 of the Expenditure Report is a listing of all equipment and non-consumable low-value items that cost \$200 or more. Non-consumable items would include such things as printers, digital cameras, classroom set of GPS units, etc. Software is not a non-consumable item. The item, the quantity, the school, the program, and the teacher must be specified.

Part 2 must be completed by the Coordinator prior to submission of Expenditure Report.

## **SECTION 8 - LOCAL USES OF FUNDS**

### **Uses of funds**

“Each eligible recipient that receives funds under this part shall use such funds to improve career and technical education programs.” – Excerpt from Perkins IV

The meaning of the phrase improve career and technical education programs is not defined. It is clear, however, that you may not use federal funds to maintain the status quo. You would not be authorized to use the funds to provide the same programs year after year. For example, federal funds could not be used to subsidize the costs of an automobile mechanics program if the program offers the identical curriculum offered in previous years. On the other hand, it would be permissible to use funds to modify the curriculum, update the curriculum, or develop a totally new curriculum for auto mechanics. An activity, project, or service is considered new for up to three years – the year of its inception and the two following years. However, even though a particular expenditure may be allowable by the Act and by federal regulation, the state retains the authority to disallow that expense if it is not consistent with the state’s plan for these funds.

### **State’s guideline for Perkins with regard to allowable expenditures – See Section 9**

Perkins is a state-administered program, which means that the state may impose more restrictions/requirements on the funds than are stated in the Act or in federal regulation. The state has chosen to be more restrictive on some allowable expenditures – see Section 9 for specific guidance.

### **Required activities**

Funds shall be used to support career and technical education program that–

- (1) strengthen the academic and career and technical skills of students participating in career and technical education programs, by strengthening the academic and career and technical education components of such programs through the integration of academics with career and technical education programs through a coherent sequence of courses, such as career and technical programs of study described in section 122(c)(1)(A), to ensure learning in—
  - (A) the core academic subjects (as defined in section 9101 of the Elementary and Secondary Education Act of 1965); and
  - (B) career and technical education subjects;
- (2) link career and technical education at the secondary level and career and technical education at the postsecondary level, including by offering the relevant elements of not less than 1 career and technical program of study described in section 122(c)(1)(A);
- (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 career and technical education, which may include—
  - (A) training of career and technical education teachers, faculty, and administrators to use technology, which may include distance learning;

- (B) providing career and technical education students with the academic and career and technical skills (including the mathematics and science knowledge that provides a strong basis for such skills) that lead to entry into the technology fields; or
- (C) encouraging schools to collaborate with technology industries to offer voluntary internships and mentoring programs, including programs that improve the mathematics and science knowledge of students;
- (5) provide professional development programs that are consistent with section 122 to secondary and postsecondary teachers, faculty, administrators, and career guidance and academic counselors who are involved in integrated career and technical education programs, including—
  - (A) in-service and preservice training on—
    - (i) effective integration and use of challenging academic and career and technical education provided jointly with academic teachers to the extent practicable;
    - (ii) effective teaching skills based on research that includes promising practices;
    - (iii) effective practices to improve parental and community involvement; and
    - (iv) effective use of scientifically based research and data to improve instruction;
  - (B) support of education programs for teachers of career and technical education in public schools and other public school personnel who are involved in the direct delivery of educational services to career and technical education students, to ensure that such teachers and personnel stay current with all aspects of an industry;
  - (C) internship programs that provide relevant business experience; and
  - (D) programs designed to train teachers specifically in the effective use and application of technology to improve instruction;
- (6) develop and implement evaluations of the career and technical education programs carried out with funds under this title, including an assessment of how the needs of special populations are being met;
- (7) initiate, improve, expand, and modernize quality career and technical education programs, including relevant technology;
- (8) provide services and activities that are of sufficient size, scope, and quality to be effective; and
- (9) provide activities to prepare special populations, including single parents and displaced homemakers who are enrolled in career and technical education programs, for high skill, high wage, or high demand occupations that will lead to self-sufficiency.

Note: While Perkins funds are not required to be spent on every required activity, the recipient must assure that all required activities are being carried out.

### **Permissive activities**

Funds made available to an eligible recipient under this title may be used—

- (1) to involve parents, businesses, and labor organizations as appropriate, in the design, implementation, and evaluation of career and technical education programs authorized under this title, including establishing effective programs and procedures to enable informed and effective participation in such programs;
- (2) to provide career guidance and academic counseling, which may include information described in section 118, for students participating in career and technical education programs, that—

- (A) improves graduation rates and provides information on postsecondary and career options, including baccalaureate degree programs, for secondary students, which activities may include the use of graduation and career plans; and
- (B) provides assistance for postsecondary students, including for adult students who are changing careers or updating skills;
- (3) for local education and business (including small business) partnerships, including for—
  - (A) work-related experiences for students, such as internships, cooperative education, school-based enterprises, entrepreneurship, and job shadowing that are related to career and technical education programs;
  - (B) adjunct faculty arrangements for qualified industry professionals; and
  - (C) industry experience for teachers and faculty;
- (4) to provide programs for special populations;
- (5) to assist career and technical student organizations;
- (6) for mentoring and support services;
- (7) for 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) for teacher preparation programs that address the integration of academic and career and technical education and that assist individuals who are interested in becoming career and technical education teachers and faculty, including individuals with experience in business and industry;
- (9) to develop and expand postsecondary program offerings at times and in formats that are accessible for students, including working students, including through the use of distance education;
- (10) to develop initiatives that facilitate the transition of sub baccalaureate career and technical education students into baccalaureate degree programs, including—
  - (A) articulation agreements between sub-baccalaureate degree granting career and technical education postsecondary educational institutions and baccalaureate degree granting postsecondary educational institutions;
  - (B) postsecondary dual and concurrent enrollment programs;
  - (C) academic and financial aid counseling for sub baccalaureate career and technical education students that informs the students of the opportunities for pursuing a baccalaureate degree and advises the students on how to meet any transfer requirements; and
  - (D) other initiatives—
    - (i) to encourage the pursuit of a baccalaureate degree; and
    - (ii) to overcome barriers to enrollment in and completion of baccalaureate degree programs, including geographic and other barriers affecting rural students and special populations;
- (11) to provide activities to support entrepreneurship education and training;
- (12) for improving or developing new career and technical education courses, including the development of new proposed career and technical programs of study for consideration by the eligible agency and courses that prepare individuals academically and technically for high skill, high wage, or high demand occupations and dual or concurrent enrollment opportunities by which career and technical education students at the secondary level could obtain postsecondary credit to count towards an associate or baccalaureate degree;
- (13) to develop and support small, personalized career-themed learning communities;
- (14) to provide support for family and consumer sciences programs;

- (15) to provide career and technical education programs for adults and school dropouts to complete the secondary school education, or upgrade the technical skills, of the adults and school dropouts;
- (16) to provide assistance to individuals who have participated in services and activities under this Act in continuing their education or training or finding an appropriate job, such as through referral to the system established under section 121 of Public Law 105–220 (29 U.S.C. 2801 et seq.);
- (17) to support training and activities (such as mentoring and outreach) in non-traditional fields;
- (18) to provide support for training programs in automotive technologies;
- (19) to pool a portion of such funds with a portion of funds available to not less than 1 other eligible recipient for innovative initiatives, which may include—
  - (A) improving the initial preparation and professional development of career and technical education teachers, faculty, administrators, and counselors;
  - (B) establishing, enhancing, or supporting systems for—
    - (i) accountability data collection under this Act; or
    - (ii) reporting data under this Act;
  - (C) implementing career and technical programs of study described in section 122(c)(1)(A); or
  - (D) implementing technical assessments; and
- (20) to support other career and technical education activities that are consistent with the purpose of this Act\*.

**Purpose of the Act\***

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

- (1) building on the efforts of States and localities to develop challenging academic and technical standards and to assist students in meeting such standards, including preparation for high skill, high wage, or high demand occupations in current or emerging professions;
- (2) promoting the development of services and activities that integrate rigorous and challenging academic and career and technical instruction, and that link secondary education and postsecondary education for participating career and technical education students;
- (3) increasing State and local flexibility in providing services and activities designed to develop, implement, and improve career and technical education, including tech prep education;
- (4) conducting and disseminating national research and disseminating information on best practices that improve career and technical education programs, services, and activities;
- (5) providing technical assistance that—
  - (A) promotes leadership, initial preparation, and professional development at the State and local levels; and
  - (B) improves the quality of career and technical education teachers, faculty, administrators, and counselors;
- (6) supporting partnerships among secondary schools, postsecondary institutions, baccalaureate degree granting institutions, area career and technical education

- schools, local workforce investment boards, business and industry, and intermediaries;  
and
- (7) providing individuals with opportunities throughout their lifetimes to develop, in conjunction with other education and training programs, the knowledge and skills needed to keep the United States competitive.

## SECTION 9 - ALLOWABLE AND UNALLOWABLE COSTS

### Overview

As a subrecipient of these funds from the state agency, each local secondary recipient is required to follow OMB (Office of Management and Budget) Circular A-87. Circular A-87 contains a discussion of how to determine if an expense is allocable and reasonable, specific unallowable expense categories (although the state may set more stringent definitions if desired), and explanation of the documentation required if salaries are paid with federal funds. The website to obtain copies of the OMB circulars is as follows: <http://www.whitehouse.gov/omb/circulars/index.html>. In addition, because these are federal education funds, all applicable regulations from EDGAR (Education Department General Administrative Regulations) must be followed. This publication is available at the following web site: [www.ed.gov/policy/fund/reg/edgarReg/edgar.html](http://www.ed.gov/policy/fund/reg/edgarReg/edgar.html)

In addition to the OMB circulars and EDGAR regulation, the Perkins Act also contains a prohibition on expenditures for activities below the 7<sup>th</sup> grade. The Act also has non-supplanting requirements described as follows:

Federal grant funds must supplement and not supplant state or local funds (Perkins Act Section 311). Federal funds may not result in a decrease in state or local funding that would have been available to conduct the activity had federal funds not been received. Specific examples are found in OMB Circular A-133 Compliance Supplement (4.84.000).

In the following instances, it is presumed that supplanting has occurred:

- The LEA used federal funds to provide services that the LEA was required to make available under other federal, state, or local laws.
- The LEA used federal funds to provide services that the LEA provided with non-federal funds in the prior year.

The critical question in determining whether there has been a supplanting violation is whether federal funds were used instead of funds from non-federal sources. You will have to document that the federally-funded activity would not have been funded by state or non-federal sources.

Because Perkins is a state-administered program, the state may elect to have more stringent requirements on the expenditure of funds that might be allowed by the Act or the OMB circulars.

To assist recipients with federal grants management, the Department offers a grants management workshop every two or three years. In addition, the presentation from the most recent workshop is on the Perkins website.

Below is summary of questions to ask while determining allowable costs followed by a selected set of expenditures that are often the target for questions.

- Is the proposed cost consistent with federal cost principles?
- Is the proposed cost allowable under the relevant program?
- Is the proposed cost consistent with an approved program plan and budget?
- Is the proposed cost consistent with program specific fiscal rules?

- Is the proposed cost consistent with EDGAR?
- Is the proposed cost consistent with special conditions imposed on the grant?
- Is the proposed cost consistent with the underlying needs of the program?
  - Data driven decision making used?
  - Does it target funds to areas of weakness?
- All Costs Must Be:
  - Necessary
  - Reasonable
  - Allocable
  - Legal under state and local law

### **Career and Technical Student Organizations**

After much discussion, the agency administration has determined that the limited local federal Perkins funds should be focused on improving the instructional programs for all students. Our states plan for these federal funds is clear in its intent that the funds provide ALL career and technical students the opportunity to participate in improved instruction that will increase their achievement on the performance measures. The potential exists that, for many districts, the majority of their Perkins funds could be spent on student travel for the student organization members rather than on program improvement for all students enrolled in the program. As mentioned above, although such an expense might be allowable under federal regulations, the state has the authority to disallow this particular expense. Therefore, at the current time, local Perkins funds may only be used for teacher expenses and substitute pay.

### **Certification Costs for Students**

Recipients may use Perkins funds to pay a student's testing fee for certification tests such as A+, ASE Certification, MOUS, etc. if this is part of a project that is approved. These are individual certification tests that program completers can take to gain an industry certification/license. Perkins funds may also be used for training the teacher and/or getting him/her certified to teach the program.

### **Construction/Building Projects**

One of the allowable expenditures noted in the OBM Circular A-87 is renovation or maintenance, operations, and repairs. However, DWE will not allow this type of expenditure with the very limited federal Perkins funds that we have available. Our state plan has always emphasized program improvement – not building repair or construction. The district must take some basic responsibility to providing the minimum support necessary for the career and technical programs – such as the minimum equipment, classroom materials/supplies, and teacher salary necessary to operate the program. In Arkansas, the federal Perkins funds will continue to be focused toward raising the programs above the status quo, introducing new curriculum and new technology, and providing teacher inservice and professional development necessary to improve the instruction and increase student achievement on the performance indicators. As noted earlier in this section, just because an expense may be allowable under the regulations does not negate the state's authority to disallow that expense if it is not consistent with the state's plan for these funds.

## Equipment Vs Supplies and Inventory

According to the accounting standards for public schools, an item with a cost of less than \$1,000 per unit cost is not considered equipment for payment purposes. Even though the item may meet the equipment definition in all other respects, if it costs less than \$1,000 it should be paid for as a supply. Therefore, it is imperative that you work with your accounting office to ensure that the budget submitted in your application is aligned with the categories they use to pay for the items.

Although payment for equipment is limited to items over \$1,000 that meet the equipment definition, we require that you list all items that otherwise meet the equipment definition but have an individual cost of between \$200 - \$1,000 in your Perkins application and amendments. The forms will be amended to reflect the words Equipment and other such defined items that cost over \$200 rather than only equipment. You should also have an inventory or tracking system for these items purchased with federal funds so that they are readily identifiable when our technical assistance teams visit your district.

### CRITERIA FOR DISTINGUISHING EQUIPMENT FROM SUPPLY ITEMS (excerpt from Accounting Handbook)

Equipment Items – An equipment item is any instrument, machine, apparatus, or set of articles which meets all of the following criteria:

1. It retains its original shape, appearance and/or character with use.
2. It does not lose its identity through fabrication or incorporation into a different or more complex unit or substance.
3. It is non-expendable; that is, if the item is damaged or some of its parts are lost or worn out, it is more feasible to repair the item than to replace it with an entirely new unit.
4. Under normal conditions of use, including reasonable care and maintenance, it can be expected to serve its principal purposes for at least two years.

Supply Items – An item should be classified as a supply item if it does not meet all the equipment criteria above. In general, a supply item has one or more of the following characteristics:

1. Its original shape, appearance and/or character changes with use.
2. It loses its identity through fabrication or incorporation into a different or more complex unit or substance.
3. It is expendable; that is, if the item is damaged or some of its parts are lost or worn out, it is usually more feasible to replace the item with an entirely new unit rather than repair it.
4. It is consumed, worn out or deteriorated as it is used, to the point of being useless or not available for its principal purpose, and under normal use, it reaches this state of uselessness or unavailability within two years.

In summary, the Department's expectation is that you will individually list non-consumable items that meet the equipment definition and that cost more than \$200 on the Perkins application and amendment forms. When the technical assistance teams visit your district, you must have a monitoring/inventory system that allows for monitoring of these items. And

the Perkins budget should reflect the correct amounts in the Equipment and the Supply/Materials category for payment purposes.

### **Salaries/Benefits**

As discussed under CTE Student Organizations and Construction/Building Projects, the state agency has the authority to limit allowable expenditures beyond what is stated by the federal law and regulations. The use of Perkins for salaries is one area in which this authority has been exercised by DWE. Perkins funds may not be used for classroom teacher salaries required to implement and/or maintain CTE programs/classes except as a stipend or payment for teacher time above the required or normal contracted days for a teacher to allow the teacher attend professional development or other work-related meetings described in an approved project in the annual application.

Stipend: A stipend has no matching benefits and the employee would receive a 1099 for income tax purposes. If the funds being paid to a staff member have matching benefits, then it is not a stipend. Before you enter into a stipend arrangement for an employee with whom you have an employment contract, it is strongly advised that you seek your auditors opinion to see if it is legal for you to pay a stipend to that particular individual. Work done on a stipend should be outside the regular contracted time. Stipends are considered Professional Services and are not included in the salary/benefits category of your budget but rather fall within the Purchased Services category. A PAR is not required to be maintained by a staff member that is paid with a stipend. However, you must document in your Perkins application the percentage of time the individual will spend on administrative activities and on program activities. If the individual will spend 15% of their time on administrative activities, then 15% of the funds paid for that stipend should be budgeted and paid from the 5% administrative cost that you are allowed to use. The remaining 85% of the stipend should be budgeted and paid from the Purchased Services category. Sufficient documentation should be maintained for auditing/monitoring purposes. You must describe in your application the criteria you used for the determination of administrative activities versus program activities.

Salary: If the funds paid to a staff member will include matching benefits, then this must be treated as salary. If 15% of the work effort funded by Perkins is spent on administrative activities, then 15% of the salary/benefits should be budgeted and paid from the administrative cost category, with the remaining 85% from the salary/benefits category.

100% salary from Perkins: If the employees entire salary at your institution is paid with Perkins funds and the employee works only on program activities or only on administrative activities, then a semi-annual certification stating that 100% of the persons work was on the Perkins activity is sufficient. However, if this work includes both administrative and program activities, then a monthly PAR is required that documents the percentage of time on each of these activities.

Portion of salary from Perkins: If only a portion of the employee's entire salary at your institution is paid with Perkins funds, then a monthly PAR is required. The PAR should document the percentage of time worked on Perkins activities and the percentage worked on all other activities. For example, if 10% of the employee's salary is funded with Perkins, then at least 10% of their work time should be spent on the Perkins activities described in your application.

Substitute teachers: If you are using Perkins funds to pay a substitute teacher to be in the classroom while the regular CTE teacher is participating in professional development or other Perkins approvable activities, a PAR is not required to be maintained by the substitute teacher.

Administrative activities or program activities: Administrative activities are duties that involve the administration of the grant funds. These include developing the local plan and annual application, assuring compliance with applicable federal and/or state laws and regulations, secretarial and administrative assistance salaries for assisting with these activities, accounting/purchasing activities with the grant funds, inventory monitoring, etc. On the other hand, program activities are those things done that carry out the projects and activities approved in the application. These include curriculum development, personnel development, providing career guidance, developing mentoring and support services/programs for CTE students, etc.

Minimum requirements for a PAR: (A sample PAR is included as Appendix D.)

- Be completed after the fact (not based on a budget only)
- Account for 100% of the employees time and detail the percentage of time that is worked on non-Perkins activities, Perkins administrative activities, and Perkins program activities
- Be signed by the employee and the employees supervisor
- Be prepared on at least a monthly basis

Documentation required in the annual application: If you are budgeting salary/benefits or stipends (except for substitute teachers), be sure that on the budget explanation you fully explain the following:

- A statement that these activities were not conducted last year using other sources of funds. If so, this is a supplanting issue for your district.
- The name of the person that the stipend or salary will support
- The person's job responsibilities with regard to the Perkins grant
- The percent of time worked on administrative activities and on program activities
- The percentage of the employees total salary that the Perkins funds will support

### **Teacher Inservice/Professional Development**

Perkins funds must not be used to pay for the registration, cost of travel or meals, or any other expense associated with professional development that will be used by a teacher to meet the state requirement of 60 hours per year. DWE worked with the Arkansas Attorney General on this question, and it is his opinion that this would be an instance of supplanting. Perkins funds may be used to pay for professional development for career and technical teachers if the hours are not being used toward meeting the required 60.

### **Travel Costs for Professional Development**

According to EDGAR, the obligation for travel costs are made at the time the travel is taken. However, some of the expenses for travel involve pre-payment – such as the advance purchase of an airline ticket, registrations, or one-night guarantee for a hotel reservation. Because much of the travel and professional development for teachers occur during the

summer months, the timing of airline ticket purchases, etc., may span two fiscal years. Since the Department operates on a first in, first out accounting method and since it has always had a sufficient carryover of unexpended local funds, local recipients may pay for airline tickets or one-night hotel guarantees from current fiscal year funds even though the actual travel may not occur until the next fiscal year. However, if for any reason the travel is not taken, the recipient must refund the money to the Department as unspent (even if the district fails to receive a refund from the conference vendor).

### **Tuition Costs for Students**

Perkins funds may not be used to reimburse tuition costs to community colleges for dual enrollment students. OVAE considers this to be a very gray area of the law. Under Section 324, this practice might be allowable if geared towards special needs students. Ultimately, this would have to be taken on a case-by-case basis, looking at the underlying circumstances surrounding the tuition reimbursement, since this is not an area of the law to which a definitive, one-size-fits-all answer can be given. Because of the limited amount of funding for Perkins, the Department is not currently approving this expenditure of funds.

## **SECTION 10 - ACCOUNTABILITY PERFORMANCE INDICATORS**

### **Definitions**

#### **Subgroup definitions:**

Concentrator - A Concentrator is a student who has enrolled in a minimum of 3 units of credit in one program of study in grades 9-12 (for example, Agriculture Business, Computer Engineering, Office Administration, etc). Concentrators are determined at the state level through APSCN (Arkansas Public School Computer Network) course enrollment records.

Completer - A Completer is a concentrator who has successfully completed a minimum of three units of credit including all of the core requirements of a career and technical program of study and has graduated from high school. Districts determine and report Completers through the Portal.

#### **Performance measure definitions:**

Academic Skill Attainment - Academic attainment is determined on the number of concentrators who left secondary education during the reporting year and who scored proficient or advanced on the literacy and geometry academic assessments used for NCLB measurement.

Career & Technical Skill Attainment - The CTE Student Competency Tests are end-of-course tests given in most CTE courses. All students enrolled in a CTE course should take the test (if one is available). Attainment is determined on the number of concentrators who left secondary education during the reporting year with an average of proficient on all skill tests taken in grades 9-12.

Graduation (aligned to NCLB) - Graduation is determined using the number of identified concentrators who are reported as graduating during the year they leave secondary education.

Completion of High School – Graduation as described above plus the number of concentrators who obtain a GED during the year they should have graduated will determine completion of high school.

Placement of Completers - Placement is determined by surveying completers six months after graduation to determine their status. Completers found in further education, employment, or the military are considered to be positive placements. The positive placement rate and the unemployment rate are figured on the completers that were found for the survey only. Thus those Completers who cannot be located despite reasonable efforts are not considered in the calculation. Placement must be reported by the district in the portal.

Nontraditional Participation and Completion - Nontraditional programs of study are those that prepare students for further education and/or employment in fields of employment in which either gender is represented at 25% or less of the workforce. An example would be females in Automotive Service Technology. The participation rate is determined by enrollments of the underrepresented gender students in courses that comprise the nontraditional programs of study (except for Word Processing). The completion rate is

determined by the number of underrepresented gender completers of nontraditional programs of study as reported by districts in the portal.

Completers of CTE Programs of Study (not a Perkins-reported indicator) - The percentage of completers of programs of study is determined by the number of completers reported by the district in the portal compared to the number of graduates reported in APSCN. This indicator is part of the district status report but not the federal Perkins report.

### **Negotiating Performance Targets for Indicators**

The Perkins Act requires that the state negotiate with local recipients if they do not wish to accept the state's performance target. The local negotiation period is March-April of 2008 for the 2008-09 program year, March-April of 2009 for the 2009-10 and 2010-11 program years, and March of 2011 for the 2011-12 and 2012-13 program years. The actual performance for 2006-07 (as well as the previous two years where appropriate) and the state's goal for 2012-13 will be used to determine initial targets. During the negotiation period, the local recipients may propose alternative targets with justification. However, the state has the final decision on targets.

### **Reporting Completers**

The open period of submitting completers of programs of study is generally mid-May until September 15 each year. No extensions will be granted. This information must be submitted in the Accountability Portal.

A completer must be a graduate. Check to see if the graduate has completed three units of credit (not just three classes) in grades 9-12. One unit of credit equals one class period all year long on a regular (not block) schedule. Check to see if those three units include all of the core requirements for the program of study. The programs of study can be found in the CTE Operational Guide. (<http://dwe.arkansas.gov/CTESecondaryCareer&TechEd.htm>).

Schools should report all of their completers, even if students took the career and technical courses at a secondary vocational center or other location. The school from which the student graduates is the school that should report the completer.

Below are programs of study examples:

#### **Agricultural Business**

Core Requirements  
Ag Science & Technology (1 unit)  
Ag Business (½ unit)  
Ag Marketing (½ unit)

Note: Since the core requirements only total 2 units, the student would complete the third unit from any of the electives for Agriculture. In addition, electives may be drawn from Workplace Readiness, Workforce Technology, or Internship.

## Advertising Design

### Core Requirements

Advertising Design I (1 unit)

Advertising Design II (2 units)

Note: Since the core requirements total 3 units, the student must complete both of these two courses to be a Completer.

## **Reporting Placement**

### **Placement status definitions**

Employment in field of program completed – Completers are considered employed in the field of program completed if they work for pay on a part-time or full-time basis in a job related to their program.

Employed not in the field of program completed – Completers are considered employed in this category if they work for pay in any job on a part-time or full-time basis.

Further Education – Completers are considered enrolled in further education or training if they are enrolled in a postsecondary institution or advanced training program.

Military – Military service may include any branch of the armed forces.

Not Found – Completers who cannot be located despite all reasonable attempts or who are incarcerated or deceased should be marked as Not Found.

Unemployed – Completers who are not enrolled in further education and not employed should be reported as unemployed.

### **Time period for placement determination**

The placement survey must be conducted for the 2<sup>nd</sup> quarter following graduation. This is the October – December time period.

Once placement status has been determined, the information must be entered into the Arkansas Department of Workforce Educations Accountability Portal. The open period for this activity will be mid-November through February 15<sup>th</sup> following graduation. No extensions of the deadline for submission will be granted.

### **Methods for data collection**

There are many ways to collect reliable placement data including mail or telephone or Internet surveys, school personnel questionnaires, and/or interviews with parent/relative or currently enrolled students. It is recommended that the district obtain contact information from the completers prior to graduation for use in the placement survey. The method(s) used to collect placement data should be documented in district/consortia files for future data audits.

## **Placement in multiple statuses**

Completers achieving multiple placement outcomes should be reported as follows:

Enrolled in further education and employed – report as enrolled in further education

Enrolled in further education and in the military – report as enrolled in further education

## **Placement calculations**

Placement rates are based on the number of CTE Completers making a successful transition within the six months following graduation. Rates are calculated using the following formula:

*Numerator* – The number of CTE Completers in the reporting year who were enrolled in further education or training; employed in field of program completed; employed, not in field of program completed; or enlisted in the military.

*Denominator* – The number of CTE Completers in the reporting year less those not found during the placement survey.

## **Reporting restrictions**

Because the most accurate information available is needed to assess placement rates, intent questionnaires or plans at the time of graduation shall not be used. Data must be collected from all CTE Completers, not just from a representative sample of students. If more than 5% of the completers are reported as not found, documentation should be maintained regarding the efforts made to locate each completer.

## **Nontraditional Information**

**Nontraditional Programs** – A program of study is classified as nontraditional if it prepares students for further education/training or for employment in a career field in which either gender is represented at 25% or less. Please note that it is the actual workplace statistics which determines the nontraditional status, and not the enrollment balance in the class.

**Nontraditional Participation** – A nontraditional student is a female enrolled in one of the core-required courses (with the exception of Word Processing) from the first list below or a male enrolled in one of the core-required courses from the second list below. To determine the percent of nontraditional participation: Add the number of females in the first list and the number of males in the second list; then compare that figure to the total enrollment of students in all of these core courses.

**Nontraditional Completion** – A nontraditional completer is a female completing a program of study from the first list below or a male completing a program of study from the second list below. To determine the percent of nontraditional completers: Add the female completers from the first list and the male completers of the second list; then compare that figure to the total completers of all of these programs of study.

## **Nontraditional pathways for females**

**Agriculture, Food and Natural Resources**

Agribusiness Systems  
Animal Systems  
Environmental Service Systems  
Food Products and Processing Systems  
Natural Resources  
Plant Systems  
Power, Structural and Technical Systems

**Architecture and Construction**

Construction  
Design/Pre-Construction  
Maintenance and Operations

**Arts, A/V Technology and Communications**

Journalism and Broadcasting  
Printing Technology  
Telecommunications

**Business, Management and Administration Services**

General Management

**Hospitality and Tourism**

Restaurant & Food and Beverage Services

**Information Technology**

Information Support and Services  
Network Systems  
Programming/Software Development

**Law, Public Safety, Corrections and Security**

Law Enforcement Services

**Manufacturing**

Maintenance, Installation & Repair  
Production

**Science, Technology, Engineering and Mathematics**

Engineering and Technology  
Science and Mathematics

**Transportation, Distribution and Logistics**

Facility and Mobile Equipment Maintenance  
Transportation Operations

**Nontraditional for male**

**Business, Management and Administration Services**

Administrative Support  
Operations Management

**Education and Training**

Teaching & Training

**Health Science**

Health Informatics  
Diagnostic Services  
Therapeutic Services

**Human Services**

Early Childhood Development & Services

Personal Care Services

**Law, Public Safety, Corrections and Security**

Legal Services

**Reporting Industry Certifications/Credentials Obtained by Teachers/Students**

Beginning with the 2008-09 school year, Perkins recipients must report any industry certifications/credentials that their CTE teachers/students obtain. These include Microsoft MOUS, IC3, ServSafe, NCCER, NATEF, Adobe, Autodesk, CNA, etc.

The data entry screens will be very similar to the entry for Completers of programs of study – except there is no verification check on the Student ID. Please be very careful to enter the correct ID number for each student. The Student ID number is the state-assigned 10-digit identification number usually referred to as the TRIAND number.

## **SECTION 11 - MONITORING AND IMPROVEMENT PLANS AND SANCTIONS**

### **Fiscal Monitoring**

In the past, DWE has relied upon a five-year cycle of technical assistance whereby 20 percent of all districts were visited annually. In addition, the monitoring of the financial side of Perkins was very limited. A risk management plan for monitoring Perkins funds has been implemented. A copy is included as Appendix E.

The plan incorporates risk elements for identifying potential sites to be monitored as well as other factors that will allow the Department to monitor at its discretion throughout the year.

The aggregation of points will be done during the first quarter of each fiscal year and will be based on the current and/or previous year. To the extent possible, all onsite fiscal monitoring will be scheduled during the second and the third quarters. As stated in the Plan, the purpose of our onsite fiscal monitoring is to ensure compliance with state and federal regulations and to identify and help resolve compliance problems in order to avoid audit findings. Identifying any areas of non-compliance early in the current fiscal year will allow the recipients sufficient time to take corrective action.

### **Performance Improvement Plans and Sanctions**

Any recipient that fails to meet at least 90% of any performance target must file an improvement plan during the following year. The improvement plan will be a part of the annual application for the next year. The Department may request progress reports periodically to determine if an improvement plan is implemented and is effective.

Below is the description of how the state intends to use improvement plans and sanctions for improving and evaluating the effectiveness of Perkins funds.

After a recipient is identified as failing to meet an adjusted level of performance, the recipient must file an improvement plan that addresses each indicator in which 90 percent of the target was not achieved. The Act requires that the state monitor and provide technical assistance regarding performance and further specifies that the state may redirect all or a portion of a local recipient's funds to provide services to students through alternative arrangements if the recipient fails to implement an improvement plan or fails for three consecutive years on the same indicator. SBWECO will be notified of all districts and postsecondary institutions entering into an improvement plan each year.

First year of improvement plan: State staff will monitor implementation of the plan and provide technical assistance as requested.

Second year of improvement plan: State staff will monitor on-site to determine if the improvement plan has been fully implemented. Failure to implement the improvement plan may result in the staff's recommendation to the State Board to redirect all or a portion of the recipient's funds to provide services through an educational cooperative, through another recipient who is successfully meeting its performance targets, or through an alternate appropriate provider with expertise in the area in which the recipient is failing.

Third year of improvement plan: During the third year of an improvement plan, the state will continue to provide technical assistance and monitor the recipient for improvements. If the recipient has implemented its improvement plan but still fails to meet 90 percent of the adjusted performance level for the same indicator after the third year, the State Board may redirect a portion or all of the recipient's funds and provide services to the recipient's CTE students and programs through alternative arrangements. These alternative providers include a postsecondary institution, a school district, an educational cooperative, a state agency, or another alternative provider with expertise in the area in which the recipient is failing.

Due to the timing of availability of data, January of the year following the actual performance is the earliest date recipients will be notified of failure on any indicator. A specific example of how the improvement plan will be implemented is described below using one of the indicators with a negotiated local level of performance for the 2007-08 fiscal year. (Only three secondary indicators will have targets in 2007-08; all other indicators, both secondary and postsecondary, will have targets beginning in 2008-09.)

January/February 2009: Recipient A is notified that it did not meet 90 percent of the target on graduation for the 2007-08. The State Board is notified in April that Recipient A must file an improvement plan.

July 1, 2009: Local application and improvement plan for 2009-10 is due.

***July 2009-June 2010: First year of improvement plan for graduation***

January 2010: Recipient A is notified that it did not meet 90 percent of the target on graduation for 2008-09. The State Board is notified in April that Recipient A must continue its improvement plan for the second year.

June 2010: Local application and improvement plan for 2010-11 is due.

***July 2010-June 2011: Second year of improvement plan for graduation***

January 2012: Recipient A is notified that it did not meet 90 percent of the target on graduation for 2009-10. The State Board is notified in April that Recipient A must continue its improvement plan for the third year.

June 2011: Local application and improvement plan for 2011-12 is due.

***July 2011-June 2012: Third year of improvement plan for graduation***

January 2012: Recipient A is notified that it did not meet 90 percent of the target on graduation for 2010-11. The State Board is notified in February that Recipient A has failed to meet 90 percent of the local target for graduation for the third consecutive year.

April 2012: DWE or ADHE will recommend sanctioning action to the State Board.

Factors that will be considered before recommending sanctions include, but are not limited to, the following:

- Was any progress made toward meeting the target, even if the 90 percent level was not attained?
- Is the recipient failing on multiple indicators?
- Did the recipient obtain technical assistance on the indicator(s) in question from recognized credible sources?
- If the recipient is a consortium, were efforts of improvement directed toward the member(s) that caused the failure?
- Were Perkins funds directed toward improvement on the failing indicator(s)?

## SECTION 12 - TEACHER INFORMATION SYSTEM

Each fall we ask the CTE teachers to enter their contact information and teaching schedule for the coming year. This information is used to develop the list of career pathways/programs of study that are being offered by the schools. As the coordinator, you can review the information the teachers entered. We may also ask for the Perkins coordinators' assistance in reminding all CTE teachers to enter information by the deadline.

Education Accountability Portal - TeacherInfo ( ADWE ) mkoettel - Microsoft Internet Explorer	
File Edit View Favorites Tools Help	
Address <a href="http://wettest.k12.ar.us/vadwe/teacherinfo/ReviewTeacherInfo2.asp?SchoolYear=2005">http://wettest.k12.ar.us/vadwe/teacherinfo/ReviewTeacherInfo2.asp?SchoolYear=2005</a>	
Name (First MI Last):	<b>Cheryl S Edington</b>
District/School:	<b>Alma School District / Alma High School</b>
Job Responsibility:	<b>Teacher</b>
Work Email Address:	<b>cedington@almasd.net</b> ( <a href="#">send an email?</a> )
Work Phone Number:	<b>(479) 632-2162</b>
Work Fax Number:	<b>(479) 632-5070</b>
Best Time to Contact Me:	<b>9:00 a.m.</b>
Teacher Home Contact Information (optional)	
Home Email Address:	
Home Phone Number:	
Home Street Address:	
Home City/State/ZIP:	<b>Van Buren, AR72956</b>
Occupational Areas:	Programs Of Study
Family and Consumer Sciences, Education, and Hospitality	<b>Family &amp; Consumer Sciences Education</b>
<u>Vocational Courses 1st Semester</u>	<u>Vocational Courses 2nd Semester</u>
493110 - Food & Nutrition	493200 - Nutrition & Wellness
493110 - Food & Nutrition	493200 - Nutrition & Wellness
493020 - Child Development	493020 - Child Development
493110 - Food & Nutrition	493200 - Nutrition & Wellness
493020 - Child Development	493020 - Child Development
493080 - Family & Consumer Sciences	493080 - Family & Consumer Sciences
Remarks Section	
Teacher Remarks:	
ADWE Remarks:	<p>--- at 9/23/2004 1:10:00 PM, Rose Marie Willis wrote:  <b>Has state and national affiliated FCCLA</b>  <b>Teaches core course</b>  <b>Teaches FWC as the foundation course at the middle school</b>  <b>Program of Study in FACS Ed is approved</b></p> <p>--- on 9/30/2004 1:22:00 PM, Suellen Ward wrote:  <b>POS-FACS-APPROVED</b></p>

## SECTION 13 - USEFUL LINKS FOR COORDINATORS

Department of Workforce Education (<http://dwe.arkansas.gov>)

This is the most important web site for Coordinators. You need to bookmark this site on your favorites list. Access to the Portal, to Student Competency Testing, and to all other secondary career and technical information is here.

[Arkansas Secondary Career and Technical Education](#) (first link under Career and Technical Education on the home page) This site contains links for the following information:

- Curriculum Frameworks
- District Status Reports
- Perkins Information
- Program Policies
- Operational Guidance –includes programs of study, minimum equipment lists, etc.
- Inservice Training Opportunities
- Specific Program Information
- New Program Start-Up Applications and Reimbursement Forms

[Arkansas Association of Career and Technical Educators](http://www.arkansas-acte.org/) (<http://www.arkansas-acte.org/>)

Many career and technical teachers/administrators are members of the ACTE. There is an annual conference prior to the beginning of school each year. The Department works closely with ACTE to bring relevant and appropriate inservice to the conference.

[Career Clusters](http://www.careerclusters.org) (<http://www.careerclusters.org>)

This is the states national web site for information on career clusters. Arkansas participates with all other state in this effort.

[National Association for Career and Technical Education](http://www.acteonline.org) (<http://www.acteonline.org>)

This the national organization affiliated with ACTE. Each year several Arkansas CTE teachers and administrators attend the national conference – usually early December.

## **SECTION 14 - CTE AND PERKINS VOCABULARY**

10% Allowance – A Perkins recipient must not exceed any budgeted category by more than 10%. For example, if \$500 is budgeted in Materials/Supplies and \$600 is actually spent, then the amount over 10% of the \$500 must be returned to the Department. It is important that Perkins coordinators monitor their budget and expenditures throughout the year to ensure that they are within the 10% allowed. A budget amendment must be submitted no later than May 31.

Academic Attainment – One of the performance indicators for Perkins accountability.

Accountability Portal – The name of the web-based program which houses the Perkins application, the input forms for reporting completers and placement, and the Teacher Information System.

ACTE – Arkansas Association for Career and Technical Educators, a professional organization for CTE teachers and administrators that sponsors an annual conference prior to the beginning school each year. The Department co-hosts the inservices at the conference.

Amendment – A change in the Perkins application, which is allowed at any time during the year and is accessed in the Portal. The deadline to submit an amendment is May 31.

Application – The annual application required to receive the Perkins funds.

Approved Program – All CTE programs must be approved by the Department annually. The process begins when the CTE teacher enters his/her teaching schedule into the Teacher Information System.

Completer - A Completer is a concentrator who has successfully completed a minimum of three units of credit including all of the core requirements of a career and technical program of study and has graduated from high school. Districts determine and report Completers through the Portal.

Concentrator - A Concentrator is a student who has enrolled in a minimum of 3 units of credit in one program of study in grades 9-12 (for example, Agriculture Business, Computer Engineering, Office Administration, etc). Concentrators are determined at the state level through APSCN (Arkansas Public School Computer Network) course enrollment records.

Consortium – Two or more districts that join together for the purpose of receiving the Perkins funds. The consortium fiscal agent may be one of the districts or an educational cooperative or other allowable entity.

Core Indicators – Performance indicators required in the Perkins act. These include academic attainment, CTE skills attainment, graduation, placement, and participation in and completion of nontraditional programs.

CTE – Career and technical education, also known as vocational and technical education or voc ed.

CTE Skill Attainment – One of the performance indicators for accountability is career and technical skill attainment, which is measured using the student competency testing scores.

CTSO – Career and technical student organization, formerly known as vocational student organization or VSO. These include FBLA, FFA, SkillsUSA, DECA, FCCLA, and HOSA.

DWE – Department of Workforce Education

Expenditure Report – The end-of-year financial report required from Perkins recipients and accessed from the Portal. The link for submitting the report opens on July 1 following the end of the fiscal year and the deadline for submission is July 31.

Local Plan – The document that outlines how the Perkins recipient will conduct activities required to receive the funds. For Perkins IV, there is a one-year transition plan and a five-year plan.

Frameworks – The curriculum frameworks for each program/course are on the Departments web site.

High Demand – For a particular program of study to be designated as high demand, at least half of the occupations within the career pathway had to be on the state high demand list as determined by the Department of Workforce Services (Labor Market Information section). If the career pathway is designated as high demand, then all programs of study within that pathway are also high demand. The high demand list is recalculated each spring and an updated list is available in April each year.

High Skill – The definition of high skill is that the program of study leads to a certificate, associate degree, apprenticeship, or other type of postsecondary educational experience.

High Wage – The definition of high wage for Perkins funds for the 2007-08 fiscal year is 20% above the average working wage in Arkansas – or \$17.68 per hour. For a particular program of study to be designated as high wage, at least half of all occupations within the career pathway had to have average wages of \$17.68 per hour or higher. These calculations were done for the department by the Department of Workforce Services (Labor Market Information section). The high wage list is recalculated each spring and an updated list is available in April each year.

Improvement Project for Across-All-Programs – These are Perkins projects that address one of the performance indicators (graduation/completion, literacy, math, placement, CTE skills, or nontraditional participation/completion) for one or more programs of study.

Improvement Project for a Specific Program of Study – An improvement project for a program of study that is high wage, high skill, and high demand in the state. Regional workforce investment area data may be substituted for the state data. This type of improvement project is extensive redesign and/or equipping for the teacher, the curriculum, the program laboratory, etc.

Kuder – An online career assessment tool that helps students and adults develop an electronic career portfolio that can be kept for life. This is a free tool for all high school students. Districts are required to have their students take the Kuder assessment prior to receiving a state start-up grant.

Nontraditional – The Perkins Act uses the term nontraditional to refer to programs that prepare students for further education and training in fields of employment in which their gender is represented at 25% or less. The determining factor is employment in the field, not enrollment in the program.

OMB Regulations – The U.S. Office of Management and Budget publishes a set of Circulars that have allowable and unallowable uses of funds and other regulations for federal funds.

Operational Guide – The Operational Guide contains the information for operating approved CTE programs. This includes the required courses for the pathways/programs of study, the minimum equipment lists, the course descriptions, etc.

OVAE – Office of Vocational and Adult Education, U.S. Department of Education

PAR – Personnel Activity Report, another term for a timesheet or record of activity for someone that is paid in part or whole with Perkins funds.

Perkins IV – This is the current CTE legislation. The authorization period is 2007-08 to 2012-13.

Perkins Coordinator – The coordinator is the person who is responsible for the Perkins application.

Placement – This is one of the performance indicators for Perkins accountability.

Portal – (see Accountability Portal)

Program Policies – This is the document that contains the State Board approved policies by which the Career and Technical Education Section of the Department operates.  
<http://dwe.arkansas.gov/CTESCTEProgramPoliciesandProcedures.htm>

Report Card – The District Status Report, which provides information on the programs offered and some of the performance indicators, is sometimes referred to as the Report Card.

Single LEA – A district that keeps the Perkins funds rather than assigning the funds to a consortium is referred to as a single LEA.

Start-up Grant – A start-up grant is a state grant for a new program of study/pathway.

Status Report – The district status report is occasionally referred to as the report card.

Student Competency Testing – The Department has developed end-of-course tests for most of the CTE courses. The testing is conducted online.

TIS – This refers to the Teacher Information System within the Portal, the web site that CTE teachers use to enter their contact information and teaching schedule each fall.

## WAIVER OF \$15,000 MINIMUM GRANT

### WAIVER PROCESS FOR \$15,000 MINIMUM ALLOCATION ON PERKINS

The Carl D. Perkins Career and Technical Education Act of 2006 has the following provision regarding waivers of the \$15,000 minimum secondary allocation:

Section 131(c) MINIMUM ALLOCATION. –

(1) IN GENERAL. – Except as provided in paragraph (2), a local educational agency shall not receive an allocation under subsection (a) unless the amount allocated to such agency under subsection (a) is greater than \$15,000. A local educational agency may enter into a consortium with other local educational agencies for purposes of meeting the minimum allocation requirement of this paragraph.

(2) WAIVER. – The eligible agency shall waive the application of paragraph (1) in any case in which the local educational agency –

- (A) (i) is located in a rural, sparsely populated area, or
  - (ii) is a public charter school operating secondary vocational and technical education programs, and
- (B) demonstrates that the local educational agency is unable to enter into a consortium for purposes of providing activities under this part.

**Waiver Format:** The LEA must submit a written waiver request to Mr. Charles Brown, Associate Director for Finance, which fully addresses both (A) and (B) of subsection (2) above. Documentation must be presented. In particular, the LEA must document why it is unable to join a consortium to meet the \$15,000 minimum.

**LEA Submission Timeline:** The Department will accept a waiver request at any time prior to May 15 for the upcoming fiscal year. Waiver requests will not be considered after May 15 for the upcoming fiscal year. (Example, a waiver request received on May 20, 2007, will not be considered for the 2007-08 fiscal year. However, it could be considered for the 2008-09 fiscal year.)

**Department Response Timeline:** The Departments Senior Management Team will respond to a waiver request within 10 working days of receipt of the request. If a waiver is approved, the LEA may then submit a plan and application for Perkins funds. However, until the plan and application is submitted, no Perkins funds may be obligated by the LEA for any purpose. If disapproved, the LEA must enter into a consortium with other local education agencies in order to participate in Perkins-funded activities. Or the LEA may decline to accept Perkins funds.

**Address for Waiver Requests:** Mr. Charles Brown, Associate Director for Finance  
Arkansas Department of Workforce Education  
Three Capitol Mall  
Little Rock, AR 72201  
(fax 501.682.1509)

**MEMORANDUM OF UNDERSTANDING – ASSIGNMENT OF FUNDS****Assignment of Funds and Memorandum of Understanding  
Detailing the Operation of the [NAME] Carl D. Perkins Secondary Consortium**

**Governing Board:** All decisions not otherwise prescribed in this document regarding the uses of funds, either consortium-wide or on individual members' campuses, and/or the operations of the consortium as a whole will be made by consensus of a Governing Board representing each member district. The Governing Board shall convene as often as necessary and by means of its choosing to conduct Consortium business.

**Consortium Funding:** The total of the amount of Perkins funds for which all member districts qualified shall comprise the Consortiums allocation. All funds shall reside with the fiscal agent; the fiscal agent shall make no grant allocation to member districts other than might be required to cover the costs of specific activities or services being or to be conducted on that members campus. Member districts shall not retain nor administer an on-going Perkins account.

**Member Services:** In accordance with Section 131(f)(2) of the Act, all member districts shall receive services from the Consortium in accordance with demonstrated need. Services shall be provided on a consortium-wide basis. The specific activities funded by the Consortium on member campuses, however, may vary as needs on individual campuses indicate, provided these activities have merit toward improvement of the member institutions performance on the core indicators.

**Consortium Fiscal Agent:** The fiscal agent for the Perkins Consortium shall be the [NAME] Educational Cooperative. It shall be the fiscal agent's responsibility to handle and account for all Consortium funds, and pay all bills for costs of activities or services provided by the Consortium on members' campuses. In addition, the fiscal agent will be responsible for preparing and submitting the Consortiums annual grant application and the local plan, and for submitting to ADWE all required forms and reports in the name of the Consortium. The fiscal agent may, at its discretion, use up to 5% of the Consortiums total grant allocation to cover the costs entailed in the administration of the Consortium.

**Responsibilities of Member Districts:** Member districts shall be responsible for providing the fiscal agent with the information the fiscal agent shall require in order to fulfill the responsibilities outlined in the section above, and for conducting all Consortium-funded activities or services in accordance with the requirements of the Carl D. Perkins Act.

**Legal Oversight Responsibilities:** The responsibilities of legal oversight of activities on all member campuses funded by or conducted under the provisions of the Carl D. Perkins Act and this Assignment of Funds/Memorandum of Understanding, and the use of and accounting for Perkins funds by the fiscal agent shall remain the purview of the Arkansas Department of Workforce Education.

**Assignment of Funds:** I do hereby assign the Perkins funds for the [NAME] School District [LEA #] in the amount of \$amount to the [NAME] Perkins Consortium.

**Signature and Date:**

## **STATEMENT OF ASSURANCES (Local Plan)**

Assurances form a binding agreement between the eligible recipient fiscal agent, the Arkansas Department of Education, and the U.S. Department of Education that assures all legal requirements are met in accordance with state and federal laws, regulations, and rules.

These assurances apply to program activities and expenditures of funds. Compliance to general and specific program assurances is the legal responsibility of the eligible recipient under the authorization of the local board of education.

Programs, services, and activities included under this application shall be operated in accordance with the Carl D Perkins Career and Technical Education Act of 2006 and the provisions of the Arkansas State Transition Plan for 2007-08.

### **THE APPLICANT CERTIFIES COMPLIANCE WITH:**

- Title VI and VII of the Civil Rights Act of 1964;
- Title IX of the Education Amendments of 1972;
- Section 503 and 504 of the Rehabilitation Act of 1973;
- Executive Order 11246 prohibiting employment discrimination based on race, color, sex, religion, and national origin;
- The Age Discrimination Act of 1975 and the Age Discrimination in Employment Act of 1967;
- The Equal Pay Act of 1963;
- The Americans with Disabilities Act of 1990;
- ORS 326.051 and ORS 659.105, education standards and all rules issued by the State Board of Education pursuant to these laws; and,
- All health and safety laws and regulations issued by the U.S. Department of Education pursuant to their laws, when classroom facilities will be used by students and/or faculty.

### **THE APPLICANT AGREES AND ASSURES THAT:**

1. The applicant will comply with the requirements of the Act and the provisions of the State Plan, including the provision of a financial audit of funds received under the Act which may be included as part of an audit of other Federal or State programs. [§122(c)(11)]
2. Federal funds made available under this Act for career and technical education shall supplement, and shall not supplant non-Federal funds expended to carry out vocational and technical education activities and tech-prep activities. [§311(a)]
3. The applicant will report data relating to students participating in career and technical education in order to adequately measure the progress of the students in meeting State adjusted levels of performance established under section 113, including special populations and will ensure that the data are complete, accurate and reliable. [§122(c)(13); §134(b)(2)]
5. None of the funds expended under this Act will be used to acquire equipment (including computer software), in any instance in which such acquisition results in a direct financial

- benefit to any organization representing the interests of the purchasing entity, the employees of the purchasing entity or any affiliate of such an organization. [§122(c)(12)]
6. The applicant will provide a career and technical education program that:
    - a. Meet State and local adjusted levels of performance established under section 113; §134(b)(2)]
    - b. Offer the appropriate courses of not less than 1 of the career and technical programs of study described in section 122(c)(1)(A); [§134(b)(3)(A)]
    - c. Improve the academic and technical skills of students participating in career and technical education programs by strengthening the academic and career and technical education components of such programs through the integration of coherent and rigorous content aligned with challenging academic standards and relevant career and technical education programs; [§134(b)(3)(B)]
    - d. Provide students with strong experience in, and understanding of, all aspects of an industry; [§134(b)(3)(C)]
    - e. Ensure that students who participate in such career and technical education program are taught to the same coherent and rigorous content aligned with challenging academic standards as are taught to all other students; [§134(b)(3)(D)] and
    - f. Encourage career and technical education students at the secondary level to enroll in rigorous and challenging courses in core academic subjects (as defined in section 9101 of the Elementary and Secondary Education Act of 1965); [§134(b)(3)(E)]

#### **PROGRAM ASSURANCES TITLE I - PART C—Local Provisions**

1. Federal funds received under Title I, Part C of Public Law 109-270 are used to improve career and technical education programs.
2. Funds are used according to the requirements identified in Title I, Part C, Section 135; Local Uses of Funds.
3. Eligible recipients shall not receive an allocation under Section 131 (a) unless the amount allocated is greater than \$15,000.00. Those whose allocation is not greater than \$15,000.00 may apply for a waiver or form a consortium. [Section 131(c)(1)]
4. Comprehensive professional development (including initial teacher preparation) for career and technical, academic, guidance, and administrative personnel will be provided that promotes the integration of coherent and rigorous content aligned with challenging academic standards and relevant career and technical education (including curriculum development). [Section 134(b)(4)]
5. Eligible recipients shall involve parents, students, teachers, representatives of business and industry, labor organizations, representatives of special populations, and other interested individuals in the development, implementation, and evaluation of career and technical education programs assisted under Title I. Eligible recipients shall maintain documentation on how such individuals and entities are effectively informed about, and assisted in understanding the requirements of Title I. [Section 134(b)(5)]
6. Eligible recipients will provide a career and technical education program that is of such size, scope, and quality to bring about improvement in the quality of vocational and technical education programs. [Section 134(b)(6)]
7. The local school district will implement a process to evaluate and continuously improve its performance. [Section 134(b)(7)]
8. Eligible recipient (A) will review career and technical education programs, and identify and adopt strategies to overcome barriers that result in lowering rates of access to or lowering success in programs, for special populations, (B) will provide programs that are designed to enable the special populations to meet the State adjusted levels of

- performance, and (C) provide activities to prepare special populations, including single parents and displaced homemakers, for high skill, high wage, or high demand occupations that will lead to self-sufficiency. [Section 134(b)(8)]
9. Individuals who are members of the special populations will not be discriminated against on the basis of their status as members of the special populations. [Section 134(b)(9)]
  10. Funds will be used to promote preparation for nontraditional fields. [Section 134(b)(10)]
  11. The local school district shall not bar students attending private, religious, or home schools from participation in programs or services under this Act. [Section 313]
  12. No funds made available under the Carl D. Perkins Career and Technical Education Improvement Act of 2006 shall be used:
    - a. to require any secondary school student to choose or pursue a special career path or major, and
    - b. to mandate that any individual participate in a vocational and technical education program, including a vocational and technical education program that requires the attainment of a federally funded skill level, standards, or certificate of mastery. (Section 314)
  13. No funds received under Carl D. Perkins Career and Technical Education Improvement Act of 2006 may be used to provide career and technical programs to students prior to the seventh grade, except that equipment and facilities purchased may be used by such students. [Section 315]
  14. Eligible recipients will adhere to federal law prohibiting discrimination on the basis of race, color, sex, national origin, age, or disability in the provision of Federal programs or services. [Section 316]

**PERSONNEL ACTIVITY REPORT**

**REPORTING PERIOD** \_\_\_\_\_

Please enter the actual hours worked, excluding sick or annual leave, on Perkins activities and non-Perkins activities:

\_\_\_\_\_ Total Hours Worked

\_\_\_\_\_ Hours worked Non-Perkins Activities

\_\_\_\_\_ Hours worked Perkins Activities

\_\_\_\_\_ Hours worked Perkins Program Activities:

- CTE Curriculum Development
- Personnel Development for CTE Teachers, Administrators, and Counselors
- Research Activities to Improve CTE Programs and Services
- CTE Program Evaluation and Development
- CTE Program Articulation
- Involving Parents/Business/Labor Organizations in CTE Program Development/Evaluation
- Providing Career Guidance and Counseling
- Developing/Providing Work-Related Experiences for CTE Students
- Developing Mentoring and Support Services/Programs for Special Populations in CTE
- Developing Local Business Partnerships for CTE Programs
- Developing CTE Programs for Adults and School Dropouts
- Providing Assistance to CTE Students in Gaining Employment and Continuing Education
- Developing Nontraditional Training and Employment Activities in CTE Programs
- CTE Data Collection and Reporting
- Other (specify): \_\_\_\_\_

\_\_\_\_\_ Hours worked Perkins Administration:

- Developing the Local Plan and Annual Application
- Assuring Compliance with Applicable Federal Laws
- Monitoring, Supervising, and Evaluating the Effectiveness of Activities Funded with the Grant
- Secretarial and Administrative Assistant Salaries for Assisting with the Grant Activities
- Accounting/Purchasing Activities for the Perkins Grant

\_\_\_\_\_ Administration Hours paid with State/Local/Other Funds

\_\_\_\_\_ Administration Hours paid by Perkins Funds

Total of above is 100% of employee's hours worked

Employee Signature \_\_\_\_\_ Date \_\_\_\_\_

Supervisor Signature \_\_\_\_\_ Date \_\_\_\_\_

## **ARKANSAS DEPARTMENT OF WORKFORCE EDUCATION PERKINS FISCAL AND PROGRAM ONSITE MONITORING PLAN**

### **1. Purpose**

The Arkansas Department of Workforce Education receives and distributes funds for federal career and technical education programs that support Arkansas' education system and that require state administration. As a condition for receipt of these funds, the department must allocate these funds according to the requirements of each specific federal grant, review and approve applications for these funds from eligible recipients, and ensure compliance with federal regulations for uses of these funds.

The department's fiscal and program monitoring is part of this system of oversight. The first tier of oversight is to collect, review, and, if necessary, act on the findings of the required annual audits conducted on every district. Fiscal and program onsite monitoring is the second tier of oversight. Its purposes are:

- To monitor recipients' Perkins expenditures to ensure compliance.
- To identify and help resolve compliance problems surrounding recipient's current uses of funds in order to avoid audit findings and possible penalties after the end of the fiscal year.

The procedures described in this document are designed to test whether grant funds reimbursed by the department have been expended for the purpose identified in the grant award and whether those expenditures are allowable costs based on the cost principles for the type of organization receiving funds. It is the Department's intent to meet the federal monitoring requirements of OMB Circular A-133.

### **2. Monitoring Selection Process**

#### Risk Factor Monitoring

Recipients will be organized into two groups:

- Consortium fiscal agents
- School Districts that maintain their own Perkins funds

Recipients will be selected for monitoring in any given year through the following steps.

Step #1 – Each year, all recipients in each group will be put in the monitoring pool.

Step #2 – Selection will be made by ranking recipients in the pool with risk factors that include the following:

- a) New recipient with little or no experience in managing the Perkins grant (recipients where persons in the coordinator role have changed will be viewed as new recipients) – 5 points
- b) Recipients whose audits or staff reviews have indicated to DWE problems with costs, lack of controls or a system to identify costs charged to the grants or that may be on the ADE Fiscal or Academic Distress List – up to 5 points

- c) Recipients that receive over \$100,000 in Perkins funds – up to 5 points
- d) Recipients that failed to meet deadlines in submitting Perkins application, expenditure report, completers of programs, or placement of completers – up to 5 points
- e) Recipients that fail to have all funds substantially approved by January 1 in prior year – up to 5 points
- f) Recipients that amended their grant in the 4<sup>th</sup> quarter by more than 25% to begin new projects – up to 5 points
- g) Recipients that fail to use a significant portion of their grant – up to 5 points
- h) Recipients that budget a portion of the funds for salary in the current or previous year – up to 5 points
- i) Recipients not monitored in past five years – up to 5 points
- j) Recipients that fail to request reimbursement on a timely basis – up to 40 points

Those assessed the highest points in the pool will be monitored that year. In addition, all consortia within the Technical Assistance Area being visited that fiscal year will be monitored.

### Special Monitoring

In addition to those recipients undergoing risk factor monitoring will be those chosen for special monitoring. Special monitoring will focus on recipients at which the department has reason to believe that Perkins funds are not being expended appropriately or who themselves are concerned about their compliance status and request a monitoring visit. Recipients may also be selected for special monitoring at the discretion of the Arkansas Department of Workforce Education.

### **3. Recipient Notification**

A recipient selected for monitoring will be notified of its selection at least two weeks in advance of the on-site monitoring visit. The department will communicate directly with the recipient's superintendent or director to establish an agreeable date for an onsite monitoring visit. At the same time, the recipient will work with Rod Duckworth, Associate Director for CTE, to prepare for the visit and will be given a list of the types of documents required to be available for the review.

When monitoring in a consortium, the team leader will identify the specific schools/programs that the team intends to visit so that the recipient can make arrangements with the school administration as appropriate prior to the date of the on-site monitoring visit.

### **4. On-site Monitoring Procedures**

#### The Monitoring Team

The On-Site Monitoring Team will be composed of three to four people and will be led by the member assigned to serve as the liaison to the recipient. Team members will begin the on-site visit with an interview with the recipient's superintendent/director to insure that he/she understands the nature and scope of the on-site monitoring visit and to collect institutional level information. Team members will make it clear that, unlike audits that

focus on expenditures after the fiscal year has been completed, monitoring focuses on current year expenditures. As such, its goal is not to seek recovery of misused funds but to identify and resolve problems during the grant year in order to avoid future audit findings and penalties.

The team members will then meet with the fiscal and program managers to review the procedures and documentation necessary to monitor the federal fiscal requirements identified in the Monitoring Checklist. Program and fiscal managers should arrange their schedules so that they can be available throughout the monitoring visit.

The Monitoring Checklist focuses on three areas of compliance:

- Internal controls are in place to ensure that costs are assigned and tracked against federal grants using a method to ensure compliance with federal requirements, that assets acquired are safeguarded, and that they are used solely for authorized purposes
- Expenditures of federal funds are in compliance with federal cost principles (principles identifying what can be funded and how it can be funded)
- Expenditures are in compliance with the recipient's approved local plans.

#### Testing Method

In order to monitor current fiscal practices for compliance in these three areas, the team will use the following testing methods:

- Internal Controls – The team will examine written policies and procedures for grant management, procure accounting records for each federal grant, check property/equipment inventories and maintenance schedules, and justify the most current request for reimbursement with grant balances and expenditures.
- Compliance with cost principles and local plans will be tested by examining outlays for the current fiscal quarter and the prior fiscal quarter. Source documentation (purchase orders, invoices, cancelled checks, payrolls, time and attendance records) for randomly selected transactions will be reviewed to determine the nature of the expenditure and to establish its allowability. Specific outlays will also be reviewed to establish their consistency with the approved local plan. Team members will examine outlays under each of the approved budget categories.

In examining the outlays, team members will look as such issues as:

- Is the expenditure a normal expenditure that should have been covered by non-grant funds?
- Does the contract indicate its purpose or the person hired is within the purpose of the grant?
- Does the work schedule for the individual indicate the time spent working on the cost objectives of the grant and on other cost objectives? Is it reported after-the-fact and signed by the individual?
- Are the costs allowable based on cost principles per OMB Circular A-87?

- Are the expenditures applicable to the period covered by the grant?
- Do expenditures requested for reimbursement agree with expenditures in the recipient's ledger for the same period?

Team members will record compliance issues in the Monitoring Checklist and will enter each of the outlays monitored in the Expenditure Worksheet and its compliance status.

### Exit Interview

The team's goal will be to complete on-site monitoring visits in one day or two days for larger consortia. However, the size of the grant, the number of sites, or the complexity of issues uncovered may extend the length of the visit. When the on-site monitoring has been completed, team members will conduct an oral exit interview with the superintendent/director and anyone else he/she deems appropriate.

Team members will identify areas of possible non-compliance and provide the opportunity for the submittal of further information or explanation to correct misperceptions or misinterpretations on their part.

## **5. Final Report & Corrective Actions**

### Final Report

The Department of Workforce Education will issue a written final report of the findings of an on-site monitoring visit within 30 days after the completion of the visit. Program staff may be consulted during that period to clarify an issue or verify the accuracy of information collected during the review. Findings of current non-compliance could be in one of three categories:

- a) Adequate internal controls are not in place
- b) Sufficient source documentation is not in place to justify an outlay
- c) Specific outlays are not allowable under cost principles or do not meet the purpose of the grant.

### Corrective Action Plan

Once the recipient has received the Final Report of the On-Site Monitoring Visit, it has thirty (30) days to respond to findings of non-compliance. In its response, it can challenge the findings by submitting material that demonstrates the inaccuracy of the finding. When it concurs that a finding of non-compliance is correct, it needs to file a corrective action plan.

The recipient may work with its visit liaison to obtain help from the department in formulating adequate corrective actions. A corrective action must be created for each finding and should result in bringing the recipient into full compliance. The nature of the corrective action will relate back to the category of the finding.

When there are weaknesses in internal controls, policies and/or procedures must be developed and implemented and accounting records must be brought into compliance with approved budgets.

- a) When sufficient source documentation is not in place, such documentation will be put into place or the outlay will be determined to be disallowable.
- b) When specific outlays are determined to be disallowable under costs principles or the purposes of the grant, the recipient must submit documents indicating those costs have been transferred and paid using non-grant funds.

Corrective actions should identify:

- The action to be taken to bring each cited item into compliance and to keep the problem from reoccurring
- Who will be responsible for the action
- When it will be completed.

When the department is satisfied that the proposed corrective actions will be successful in resolving all problems, the recipient will be notified that it has an approved corrective action plan.

Corrective actions must be completed before the current fiscal year is closed out. After the date on which corrective actions were to be completed, the liaison will either schedule a follow-up visit to verify that the actions have been carried out and that they were successful in resolving problems or will arrange for an alternate way for the recipient to demonstrate that effective corrective actions have been completed.

#### Possible Penalties

The imposition of penalties for non-compliance with federal requirements will be a last resort. The main objective of the monitoring system is to assist recipients in creating sound grant management systems. However, federal law requires that the department take action if its recipients do not comply with federal requirements.

1. Failure to resolve issues, to refund disallowed costs, or to supply adequate documentation to support costs charged to grants will result in a warning that funds may be suspended until the requirement is met.
2. Continued failure to resolve issues, to refund disallowed costs, or to supply adequate documentation will result in fund suspension until the requirement is met.

#### **6. Who to Contact**

Conducting on-site monitoring visits is only one method of addressing the state's responsibility for oversight of the Perkins funds. The Department of Workforce Education is also committed to providing the training and technical assistance that its recipients request to improve their grants management systems. For more information on this monitoring system or to request assistance, please call Mary Ellen Koettel at 501/682-1528 or Charlie Brown at 501/682-1651.