

Arkansas Division of Higher Education  
*Strengthening Career and Technical Education for the 21<sup>st</sup> Century Act (Perkins V)*

# Perkins Handbook

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**For More Information:**

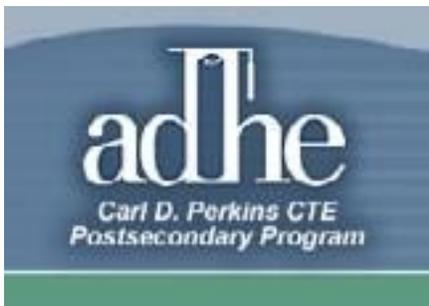
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## Section 1

### GOVERNANCE

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#### PROGRAM GOVERNANCE

The *Strengthening Career and Technical Education for the 21<sup>st</sup> Century* is generally referred to as Perkins V as it is the fifth authorization of the original 1984 legislation. The Act requires the State to designate a sole state agency to be responsible for the funds. In Arkansas, the State Board of Education is the sole state agency with oversight through the Division of Career Education (DCTE). Through a Memorandum of Understanding (MOU), the Arkansas Division of Higher Education (ADHE) is responsible for and accountable to DCTE for all performance and compliance aspects of postsecondary Perkins activities.

#### LOCAL APPLICATION AND ANNUAL PLANS

Under Perkins V, each institution must submit a four-year Local Application that describes how recipients will address gaps in performance identified through a local needs assessment process conducted in consultation with a diverse group of stakeholders and how the recipient will meet the required local uses of funds over the course of the legislation. Each local recipient is required to develop an Annual Plan that describes how each annual allocation will be used in support of the Local Application.

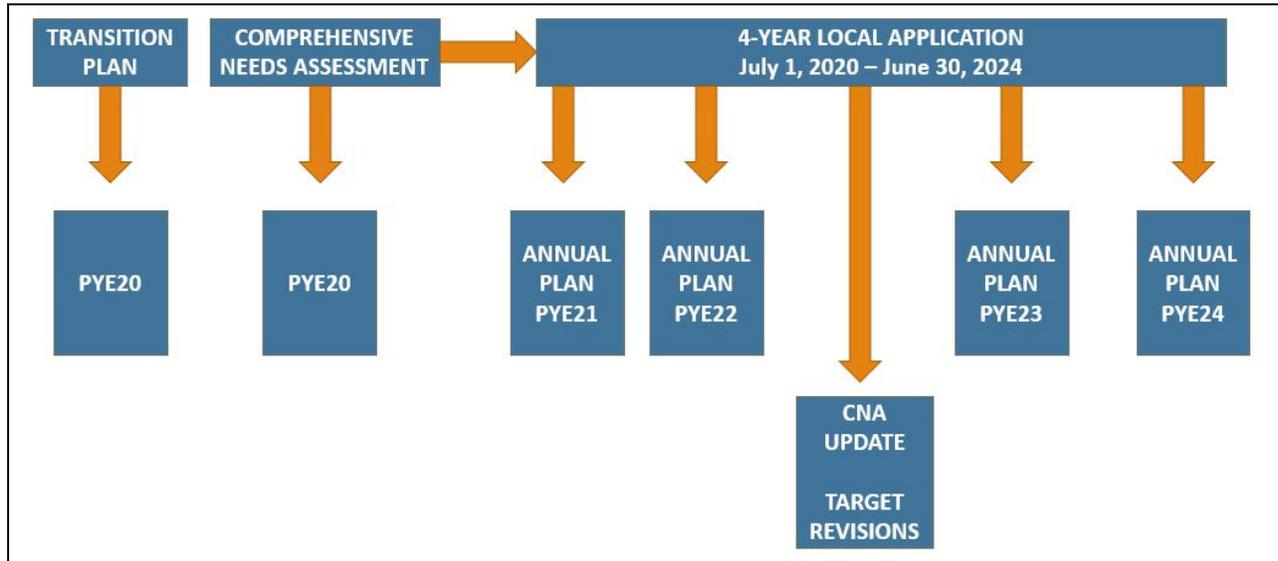
#### GRANT MANAGEMENT RESOURCES

Most information needed to administer a Perkins postsecondary grant is available online at the following sites.

- **Perkins Postsecondary Website** [www.adheperkins.com](http://www.adheperkins.com)  
Coordinator resources including the handbook, forms, guidance and links to other compliance and performance information. Brinda Berry is the webmaster and all changes or requests should be directed to her.
- **Perkins Grant Portal** <https://arc.arkansas.gov/perkins/portal/home>  
Portal for grant management including Annual Plan application, amendments and reimbursements. Permission levels vary for access to the Perkins Portal. The Coordinator has full privileges; the Fiscal Coordinator can enter reimbursement requests (but not submit); and Read-Only can view but not edit. Monieca West is the site administrator and requests for changes in access should be directed to her. Both Brinda and Monieca are available for training or questions regarding functionality. (The Perkins Portal is also accessible through [www.adheperkins.com](http://www.adheperkins.com).)
- **Perkins Collaborative Resource Network (PCRN)** <http://cte.edu.gov>  
Perkins funds are awarded by the U. S. Department of Education, Office of Career, Technical and Adult Education (OCTAE). The Department maintains the PCRN website which has a wide variety of information specific to Perkins, including the Perkins Act.
- **Strengthening Career and Technical Education for the 21<sup>st</sup> Century (Perkins V)**  
<https://bit.ly/33W1Fx1>
- **Education Department General Administrative Regulations (EDGAR)**  
<https://www2.ed.gov/policy/fund/reg/edgarReg/edgar.html>

## KEY DATES

Below is a general timeline for Perkins V.



A full timeline for the current Perkins cycle is available in Section 2-Perkins Annual Cycle. Below are critical dates defined by the Act or established by the State that cannot be renegotiated.

Date	Action
July 1, 2021	PYE22 fiscal year begins; first date to obligate funds (limited to 25% of total grant prior to October 1).
July 1, 2021	Deadline to submit PYE22 Annual Plan
October 1, 2021	Remaining 75% of basic grant becomes available for obligation.
May 1, 2022	Review and revise Local Application prior to submission of PYE23 Annual Plan.
June 30, 2022	PYE22 fiscal year ends; last date to obligate funds.
July 30, 2022	Last submission of PYE22 reimbursement requests.

## Section 2

### Perkins Annual Cycle (PYE22)

This timeline is specific to PYE22. It will be revised annually to reflect appropriate dates.

<b>April 2021</b>	<b>Funding Announced by ADHE</b>
<b>March 1, 2021</b>	<b>Consortia MOU Submitted to ADHE</b> <i>(Applies only to colleges receiving less than \$50,000.)</i>
<b>April 2021</b>	<b>Local Application Submitted with Local Performance Targets</b> <i>(LA must be approved prior to submission of Annual Plan.)</i>
<b>July 1, 2021</b>	<b>Annual Plans and Improvement Plans Submitted to ADHE</b> <i>(Improvement Plan is based on most recent year data [PYE20]; Annual Plan is how funds will be spent in upcoming program year [PYE22].)</i>
<b>July 1, 2021</b>	<b>Program Funds Available for Approved Plans</b> <i>(Firm date; cannot be changed. Plans may be designated as “substantially approvable” but at least 75% of funds must be allocated in order to be considered “substantial.”)</i>
<b>July 29, 2021</b>	<b>Final Reimbursement Request Deadline for Funds from Year Just Ended</b> <i>(This is a firm date due to end of year federal reporting schedule fixed by Arkansas Division of Career Education.)</i>
<b>August 04, 2021</b>	<b>Perkins Annual File I-Special Populations Submitted into AHEIS</b> <i>(Includes results of spring special pops data collected manually or during registration; data is submitted from preceding fall and spring terms. This date may vary; see AHEIS manual for exact date.)</i>
<b>August 04, 2021</b>	<b>Perkins Annual File II -Supplemental Credentials Submitted into AHEIS</b> <i>(Includes results received by the college from July 1-June 30. May include students currently enrolled or already graduated. Report when results are received; not when assessment was taken. This date may vary; see AHEIS manual for exact date.)</i>
<b>October- November 2021</b>	<b>Compliance Reviews</b> <i>(Includes review of needs assessment and stakeholder engagement documentation, progress on current Annual Plan activities and update on any activities required under an improvement plan. Type of review is based on risk.)</i>
<b>November 1, 2021</b>	<b>Fall Term Special Population Survey</b> <i>(Required only if institution does not collect data electronically. Data is collected and held for submission in the Perkins Annual File I-Special Populations file due into AHEIS in August 2022.)</i>

<b>January 1, 2022</b>	<b>Equipment Purchase Deadline</b> <i>Equipment should be in place so that maximum benefit is realized during the program year.</i>
<b>February-March 2022</b>	<b>Compliance Reviews Continue</b> <i>(Includes review of needs assessment and stakeholder engagement documentation, progress on current Annual Plan activities and update on any activities required under an improvement plan. Type of review is based on risk.)</i>
<b>April 1, 2022</b>	<b>Spring Term Special Population Survey</b> <i>(Required only if institution does not collect data electronically. Data is collected and held for submission in the Perkins Annual File I-Special Populations file due into AHEIS in August 2022.)</i>
<b>June 30, 2022</b>	<b>Deadline to Obligate Funds</b> <i>(Firm date; cannot be changed. Date of obligation varies by type of expense; see EDGAR 76.707.)</i>
<b>July 1, 2022</b>	<b>Program Funds Available for Approved Plans</b> <i>(Firm date; cannot be changed. Plans may be designated as “substantially approvable” but at least 75% of funds must be allocated in order to be considered “substantial.”)</i>
<b>July 31, 2022</b>	<b>Final Reimbursement Request Deadline for Funds from Year Just Ended</b> <i>(This is a firm date due to end of year federal reporting schedule fixed by Arkansas Division of Career Education.)</i>
<b>Mid-August 2022</b>	<b>Perkins Annual File I-Special Populations Submitted into AHEIS</b> <i>(Includes results of spring special pops data collected manually or during registration; data is submitted from preceding fall and spring terms. This date may vary; see AHEIS manual for exact date.)</i>
<b>Mid-August 2022</b>	<b>Perkins Annual File II-Supplemental Credentials Assessment Submitted into AHEIS</b> <i>(Includes results received by the college from July 1-June 30. May include students currently enrolled or already graduated. Report when results are received; not when assessment was taken. This date may vary; see AHEIS manual for exact date.)</i>
<b>November 30, 2022</b>	<b>State Accountability Reports Produced by ADHE</b> <i>(This is an approximate date and no action required by college. These reports will be used to determine if an improvement plan will be required when submitting the following Annual Plan.)</i>
<b>December 31, 2022</b>	<b>Federal CAR Report Submitted by ADHE</b> <i>This is a firm date and no action is required by college.</i>
<b>January 31, 2023</b>	<b>Local Accountability Reports Produced by ADHE</b>

	<p><b>Institutions Notified of Improvement Plan Status</b>  <i>(Based on previous year results; college must address improvement plan areas before spending funds on non-improvement plan performance measures.)</i></p>
<b>February 28, 2023</b>	<p><b>End of Year Program Year Report</b>  <i>(Outcomes for each Annual Plan activity are submitted into Portal.)</i></p>
<b>May 31, 2023</b>	<p><b>Improvement Plan Submitted</b>  <i>(If improvement plan is required, it will be submitted with PYE22 Annual Plan.)</i></p>

<b>October, January, April</b>	<p><b>Quarterly Reconciliation of Budgets and Expenditures</b>  <i>Federal grant management requires that budgets be reconciled (projected to actual) no less than quarterly.)</i></p>
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## Section 3

### Comprehensive Needs Assessment

SEC. 134(c)



#### OVERVIEW

The local Comprehensive Needs Assessment (CNA) is the foundation of Perkins V. It is the basis of the Local Application and is developed with input from a diverse group of stakeholders. The needs assessment relies heavily on data and the intentional use of that data to drive funding decisions.

Perhaps the biggest change in Perkins V is that Perkins funds may only be used for needs identified in the CNA and then further defined in the four-year Local Application.

The CNA can be more than an element of Perkins V. It should become a regular part of the data-driven decision-making process and is an opportunity to look at the total CTE system rather than viewing as an additional Perkins activity required every two years. It can help the institution shift from collecting data for reporting purposes to using data to ensure that local CTE programs are helping create success for all students and employers.

A primary purpose of the CNA is to determine gaps in performance between subgroups and the general student population. A gap analysis is a tool that 1) analyzes the current state of performance of various groups; 2) outlines what the institution would like for that performance to be in the future; and 3) connects the two with descriptions of factors that contribute to the difference—the root causes for barriers. The final stage of gap analysis is to identify focus areas that need corrective action which will be prioritized and included in the Local Application.

#### RESOURCES

Several tools are available to help recipients with the needs assessment and gap analysis and can be found in the Reference section of [www.adheperkins.com](http://www.adheperkins.com).

- *A Guide for Local Leaders*: Developed by ACTE (Association for Career and Technical Education), this is an overall review of the law and its requirements and focuses heavily on guidance for the CNA.
- *Improving Performance: A Five-Step Process*: Developed by NAPE (National Alliance for Partnerships in Equity), this includes tips on how to conduct an equity gap analysis and identifying the root causes that contribute to the gaps in performance.
- *ACTE Quality Program of Study Framework*: Includes elements of a quality program and evaluation methods.
- *Planning for Engagement: Identifying Key Stakeholders for Perkins V*: Provides a comprehensive guide to stakeholder engagement with checklist
- *Coordinating Across Perkins V and WIOA*: Identifies strategies for aligning Perkins and WIOA

## SUMMARY OF COMPREHENSIVE NEEDS ASSESSMENT ELEMENTS

Below are the elements that must be considered during the CNA with references to the Act provided.

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- A. **Student Performance** Sec 134(c)(2)(A)
    - All Students
    - By Gender
    - By Race
    - By Special Populations
    - Narrative Summary
  
  - B. **Quality CTE Programs** Sec 134(c)(2)(B)(i-ii)
    - Size
    - Scope
    - Quality
    - WIB Alignment
    - Other Local Education/Economic Needs
  
  - C. **Program of Study Implementation** Sec 134(c)(2)(C)
  
  - D. **Faculty and Staff Development** Sec 134(c)(2)(D)
    - All Faculty and Staff
    - Underrepresented Groups
  
  - E. **Equal Access to Quality CTE** Sec 134(c)(2)(E)(i-iii)
    - Barriers to Success for Special Populations
    - Assist Special Populations in Meeting Performance Targets
    - Prepare Special Populations for High Skill/High Wage/In-demand
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## COMPREHENSIVE NEEDS ASSESSMENT ELEMENTS

The template that follows can be used to guide the needs assessment process, but the college is not bound to follow it in this specific format. However, all items in this template must be addressed during the needs assessment process and must be documented for compliance purposes. The college is not required to enter information into the Perkins Portal for approval by state staff, but a summary of the needs assessment is required in the Local Application which does require State approval.

- (A) Evaluate the performance of the students served by the eligible recipient with respect to state determined and local levels of performance, including an evaluation of performance by subgroups: gender, race and special populations. Use results from the three most recent years of Perkins performance results to determine a three-year baseline. Sample tables are provided below as a guide to the type of information to be considered. A narrative description of major findings should summarize your findings. These findings will be used to determine potential areas of funding in the Local Application. [Sec 134(c)(2)(A)]**

CORE INDICATOR PERFORMANCE FOR ALL CONCENTRATORS		
#	INDICATOR	ALL
1P1	Retention/Placement	
2P1	Credential Attainment	
3P1	Nontraditional Participation	

Provide a narrative summary on performance of all CTE students, including major deficiencies and gaps.

CORE INDICATOR PERFORMANCE FOR ALL CONCENTRATORS BY GENDER				
#	INDICATOR	ALL	MALE	FEMALE
1P1	Retention/Placement			
2P1	Credential Attainment			
3P1	Nontraditional Participation			

Provide a narrative summary on performance of all CTE students by gender, including major deficiencies and gaps.

CORE INDICATOR PERFORMANCE FOR ALL CONCENTRATORS BY RACE									
#	INDICATOR	ALL	AS	BL	HSP	NA/AN	NH/PI	WH	2+
1P1	Retention/Placement								
2P1	Credential Attainment								
3P1	Nontraditional Participation								

**AS**=Asian **BL**=Black **HSP**=Hispanic **NA/AN**=Native American/Alaskan **NH/PI**=Native Hawaiian/Pacific Islander **WH**=White **2+**=2 or More Races

Provide a narrative summary on performance of all CTE students by race, including major deficiencies and gaps.

CORE INDICATOR PERFORMANCE FOR ALL CONCENTRATORS BY SPECIAL POPULATIONS											
#	INDICATOR	ALL	D	ED	NT	SP	OWI	EL	H	FC	AMS
1P1	Retention/Placement										
2P1	Credential Attainment										
3P1	Nontraditional Participation										

D=Disabled ED=Economically Disadvantaged NT=Nontrad SP=Single Parent OWI=Out of Work Individual EL=English Learner H=Homeless FC=Foster Care AMS=Parent on Active Military Service

Provide a [narrative summary](#) on performance of all CTE students by special populations, including major deficiencies and gaps.

**(B) Describe how career and technical education programs offered by the eligible recipient to meet the needs of all students are of sufficient in [size, scope, and quality](#) [Sec 134(c)(2)(B)(i)] and [aligned](#) to state, regional or local in-demand industry sectors or occupations identified by the state or local workforce development board, including career pathways, where appropriate [Sec 134(c)(2)(B)(ii)].**

**Size:**

- The receiving institution or consortium offers a minimum of five CTE programs of study.
- Programs of study require the following number of undergraduate semester credit hours as defined in AHECB Policy 5.11. Program hours may vary based upon program accreditation requirements.
  - Certificate of Proficiency 6-21
  - Technical Certificate 21-45
  - Associate of Applied Science 60-72
- Programs must meet viability standards as defined in AHECB Policy 5.12. In general, an average of four graduates per year for technical certificates (TC) and technical associate degree programs (AAS).

**Scope:**

- Curriculum shows a progression of instruction to occupation specificity. Where possible, students may progress from a Certificate of Proficiency to a Technical Certificate to an Associate Degree which provides multiple entry and exit points.
- Curriculum offers academic, technical and employability skills, either through individual courses or embedded in courses.
- Curriculum is aligned with the needs of industry and is informed by labor market information.
- Curriculum provides opportunities to obtain recognized credentials, industry certifications or degrees.

Quality:

- Minimum resources for programs of study are established at the time the program is defined in AHECB Policy 5.11. These include classroom instruction, laboratory and work-based instruction, library and equipment needs.
- Programs of study are externally reviewed every 7-10 years based upon a review schedule negotiated between the intuition and ADHE as defined in AHECB Policy 5.12. The process begins with a comprehensive self-study which includes program need/demand, curriculum, faculty, resources, course delivery methods, student outcomes and program improvement activities.
- Accredited/licensed/state certified programs follow the usual review practices and schedule of the accrediting/approval body.
- Faculty meet the minimum credential requirements as defined in AHECB Policy 5.11. A minimum of one full-time faculty member with appropriate credentials is required for each degree program. Faculty teaching general education courses are expected to hold at least a master's degree with eighteen graduate hours in the teaching field. Faculty members teaching in occupational skill areas must hold at least an associate degree or appropriate industry-related licensure/certification.
- Students are provided the opportunity for early college credit (articulation/dual/concurrent) for both academic and technical courses.

Describe the [in-demand sectors](#) or occupations identified by state or local Workforce Investment Boards and how CTE programs are [aligned](#) with those needs.

Describe [other local education or economic needs](#) not identified by state or local workforce development boards and how CTE programs are addressing these needs.

**(C) Evaluate progress toward [the implementation of career and technical education programs and programs of study](#). [Sec 134(c)(2)(C)]. To be considered a Perkins program of study, the program must be a coordinated, nonduplicative sequence of academic and technical content that includes both secondary and postsecondary courses. The program must address academic, technical and employability skills; be aligned with local industry needs. The program progresses in specificity (beginning with all aspects of industry and leading to occupation-specific instruction), have multiple entry and exit points that incorporate credentialing, and culminates in the attainment of a recognized postsecondary credential. This refers to how the college is working toward seamless transfer for students from high school to college.**

**(D) Describe the challenges faced by the college in [faculty and staff](#) recruitment and retention and how the college will improve recruitment, retention, and training of career and technical education teachers, faculty, specialized instructional support personnel, paraprofessionals, and career guidance and academic counselors, including individuals in groups underrepresented in such professions. [Sec 134(c)(2)(D)]**

[All Faculty and Staff](#)

[Underrepresented Groups](#)

**(E) Describe progress toward implementation of [equal access](#) to high-quality career and technical education courses and programs of study for all students. [Sec 134(c)(2)(E)]**

Describe [barriers](#) that result in lower rates of access to, or performance gaps in, the courses and programs for special populations and potential strategies needed to overcome them.

Describe [needed programs](#) or activities designed to enable [special populations](#) to meet the local [levels of performance](#) targets.

Describe needed programs or activities that will prepare [special populations](#) for [high-skill, high-wage, or in-demand](#) industry sectors or occupations in competitive, integrated settings that will lead to self-sufficiency.

## Section 4 Stakeholder Consultation

SEC. 134(d)



### OVERVIEW

How recipients elect to use Perkins funds has changed significantly in Perkins V. The process includes consulting with stakeholder groups to gain input for the Comprehensive Needs Assessment (CNA). The CNA is an internal evaluation and becomes the basis for the Local Application (a four-year document) and will be used to determine how funds will be used annually (Annual Plan and Activities). Funds may ONLY be used for purposes identified in the CNA. This will require a different planning process and longer-term planning than has been experienced in the past. The Local Application will also set performance targets for the same four-year time period.

Perkins V requires collaboration with a wide variety of key stakeholders who provide external input into uses of funds. These stakeholders are identified in the Act and input from every category is required. Failure to do so could constitute a formal audit finding. This consultation will form the basis for the four-year Local Application and associated Annual Plan activities submitted during the four years. Continued consultation is required between years two and three of the Local Application but may be done annually as needed.

### CONSULTATION CONSIDERATIONS

Perkins legislation does not prescribe how stakeholder engagement is to occur nor does it specify all of the topics to be discussed.

When developing an action plan for engagement, the recipient might start with the following (based on *AdvanceCTE Planning for Engagement*).

Who are you consulting?	Why are you consulting?	How are you consulting?	When are you consulting?
<ul style="list-style-type: none"> <li>• Minimum required by law</li> <li>• Others determined locally</li> <li>• What relationships do you wish to build</li> </ul>	<ul style="list-style-type: none"> <li>• Clarify why they are being included</li> <li>• What information do you need from them; is it of a general nature or something specific</li> <li>• What information can share that will help them better understand local CTE programs and needs</li> <li>• What information can they share to help you better understand their needs</li> </ul>	<ul style="list-style-type: none"> <li>• Is there an existing procedure to obtain stakeholder feedback</li> <li>• How can the stakeholder best engage with you: in person, survey, focus group, at their location, through their advocacy groups, etc.</li> <li>• Who is responsible for ongoing contact with specific groups</li> <li>• How will follow-up occur</li> </ul>	<ul style="list-style-type: none"> <li>• How often will you engage</li> <li>• Is a schedule determined or will engagement occur sporadically</li> <li>• Is there a timeline to assure that all stakeholders are engaged within the legal parameters of the law</li> </ul>

## DOCUMENTING STAKEHOLDER CONSULTATION

The following template can be used as a checklist to confirm that all required stakeholders have been engaged and that there is a process for continued engagement. The college will not be required to enter information into the Perkins Portal for approval, but evidence of engagement will be confirmed during compliance reviews.

The college must involve a diverse body of stakeholders during the comprehensive needs assessment process. At least two representatives from every stakeholder group below must be consulted. It will be useful to also capture contact information on the stakeholders for use when completing the “ongoing consultation” that is required by the law.

*Sec 134(d)(1-8)*

<b>Stakeholder Group</b>	✓		✓
<b>CTE Programs Staff</b>		<b>Special Populations</b>	
Faculty/Teachers		Disabled	
Career Advisors		Economically Disadvantaged	
Academic Counselors		Nontraditional Occupations	
Principals		Single Parents	
Administrators		Out-of-Workforce Individuals	
Instructional Support		English Learners	
Paraprofessionals		Homeless Individuals	
Other School Leaders		Foster Youth	
		Armed Forces Active Duty Parents	
<b>Postsecondary CTE Programs</b>			
Faculty		<b>Youth Serving Agencies</b>	
Administrators		Out of School Youth	
		Homeless Children/Youth	
<b>Workforce</b>		At-risk Youth	
State or Local Workforce Board			
Business and Industry		<b>Indian Tribes (where applicable)</b>	
<b>Parents</b>		<b>Other Key Stakeholders</b>	
<b>Students</b>			
Out of School Youth			
Homeless Children/Youth			
At-risk Youth			

**PROCESS FOR CONSULTATION**

Describe how stakeholder consultation was conducted.

Describe plans that ensure consultation on an ongoing basis with required stakeholders. Areas of ongoing input could include future revisions to the Comprehensive Needs Assessment; ensuring that CTE programs are responsive to employment needs, aligned with employment priorities and informed by labor market information; identifying opportunities for work based learning; and assuring that Perkins funds are used in a coordinated manner with other local resources. *Sec 134(e)(1-4)*

## Section 5

### Local Application

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SEC. 134(a)



#### OVERVIEW

Once the intuition completes the Comprehensive Needs Assessment and has consulted with stakeholders, the Local Application is developed to provide the direction for use of funds over the course of Perkins V.

The Local Application summarizes student performance trends and program quality elements. It prioritizes the focus areas of need for Perkins support and establishes performance targets. Funds may ONLY be used for purposes identified in the CNA and subsequently included in the Local Application. This may require a different planning process and longer term planning than has been required in the past. The Local Application will also set performance targets for the same time period.

Data fields in the Local Application are similar those in the Comprehensive Needs Assessment template. The needs assessment is the tool used to gather information; the Local Application summarizes this information and describes how funds will be focused. The Local Application will be entered into the Perkins Portal while the Comprehensive Needs Assessment will be reviewed as part of the compliance process.

#### DEFINITIONS

Definitions of common terms have changed with Perkins V. Below are the most common ones associated with the Local Application process.

**Consultation:** The act of engaging key stakeholder groups in identifying local education and workforce needs and in determining how Perkins V funds should be used to provide high quality CTE programs that meet local and regional workforce needs.

**Comprehensive Needs Assessment:** The document that is produced as a result of internal review of student performance and program quality and in consultation with stakeholders. It contains the results of stakeholder input and results of a gap analysis. The CNA identifies focus areas for use of funds over the next four years.

**Gap Analysis:** The comparison and documentation of actual performance with potential or desired performance.

**Local Application:** A four-year plan that describes how recipients will provide high quality CTE programs based on the Comprehensive Needs Assessment. Funding is limited to the focus areas identified in the CNA. Performance targets for four years are established through the Local Application.

**Annual Plan/Activities:** Describes how recipients will use funds to implement the Local Application in a specific program year. Annual activities must be related to the focus areas of need described in the Local Application. The Local Application is a broad overview; activities in the Annual Plan provide the specifics.

**Core Indicators:** Measures of performance negotiated between the state and the local recipient.

**LOCAL USES OF FUNDS-REQUIRED AND PERMISSIVE**

In order to receive funds under Perkins V, the institution must demonstrate that certain functions are being met whether with Perkins or non-Perkins funds. If gaps are identified, the institution must use Perkins funds or commit to using institutional funds to reduce them. Required uses and related permissive options are shown below.

Required	Related Permissive Options
Provide career exploration and career development activities	<ul style="list-style-type: none"> <li>• Introductory courses focused on career development, including nontraditional fields</li> <li>• Career and labor market information</li> <li>• Development of graduation and career plans</li> <li>• Career guidance and academic counseling</li> <li>• Other activities that advance knowledge of career opportunities and assist students in making informed decisions</li> <li>• Strong experience in and understanding of all aspects of an industry</li> </ul>
Provide professional development	<ul style="list-style-type: none"> <li>• Individualized academic and CTE instructional approaches, including integration of academic and technical standards in curricula</li> <li>• Ensure labor market info is used to inform programs and guidance</li> <li>• Provide faculty and staff with opportunities to advance knowledge and skills, understand all aspects of an industry including latest workplace technologies and standards</li> <li>• Support administrators in managing CTE programs</li> <li>• Implement strategies to improve student achievement and close gaps in performance of CTE programs</li> <li>• Provide faculty and staff with opportunities to improve pedagogical practices</li> <li>• Train staff to provide appropriate accommodations for individuals with disabilities</li> <li>• Train staff to effectively teach students with disabilities and who may be English learners</li> <li>• Train for effective use of community spaces that provide access to tools, technology and knowledge for learners and entrepreneurs, such as makerspaces or libraries</li> </ul>
Provide within CTE the skills necessary to pursue careers in high-skill, high-wage, or in-demand industry sectors or occupations	

<p>Support integration of academic skills into CTE programs</p>	<ul style="list-style-type: none"> <li>• Activities at postsecondary level that improve academic skills of CTE students</li> </ul>
<p>Improve student achievement on performance indicators</p>	<ul style="list-style-type: none"> <li>• Aligned programs of study</li> <li>• Sustainable relationships among education, industry and community stakeholders</li> <li>• Expand opportunity for early college credit within CTE programs of study</li> <li>• Provide appropriate equipment, technology and instructional materials aligned with business and industry needs</li> <li>• Provide work-based learning opportunities, including simulated work environments</li> <li>• Provide industry-recognized certification examinations or other assessments leading to a recognized postsecondary credential</li> <li>• Recruit and retain CTE faculty and staff</li> <li>• Coordinate with education and workforce development programs that provide transition related services</li> <li>• Expand distance CTE and blended learning programs</li> <li>• Improve career guidance and academic counseling programs</li> <li>• Support integration of employability skills into CTE programs</li> <li>• Support programs that increase access to and success in STEM fields for students in underrepresented groups in these fields</li> <li>• Provide CTE for adults or out-of-school youth to complete high school or upgrade technical skills</li> <li>• Support CTSOs including preparation for competitions aligned with CTE programs</li> <li>• Make all forms of instructional content widely available which may include use of open educational resources</li> <li>• Support integration of arts and design skills into CTE programs</li> <li>• Partner with intermediaries to improve training, development of public-private partnerships, systems development, capacity-building and scalability for delivery of high quality CTE programs</li> <li>• Support to reduce/eliminate out-of-pocket expenses for special population students participating in CTE</li> <li>• Other activities to improve CTE programs</li> </ul>
<p>Develop and implement evaluations of the activities carried out with Perkins funds, including funds necessary to complete the local needs assessment and the local report</p>	

## SUMMARY OF LOCAL APPLICATION ELEMENTS

Below are the elements that must be included in the Local Application with references to the law provided.

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(1)	<b>COMPREHENSIVE NEEDS ASSESSMENT RESULTS SUMMARY</b>	Sec 134(b)(1)
	Student Performance	
	Other	
	Prioritization	
(2)	<b>CTE OFFERINGS</b>	
	Focus Areas for Perkins V Funding Support	Sec 134(b)(2)
	Required Program of Study	Sec 134(b)(2)
	How CNA Informed Local Application	Sec 134(b)(2)(A)
	New Programs of Study Identified	Sec 134(b)(2)(B)
	Student Awareness of Course Offerings and Programs of Study	Sec 134(b)(2)(C)
	Special Populations Awareness of Course Offerings and Programs of Study	Sec 134(b)(2)(C)
(3)	<b>WIB COLLABORATION</b>	
	Career Exploration and Development	Sec 134(b)(3)(a)
	Career Information Related to High Skill/High Wage/In-demand	Sec 134(b)(3)(B)
	Career Guidance and Academic Counselling System	Sec 134(b)(3)(C)
(4)	<b>STRENGTHEN ACADEMIC AND TECHNICAL SKILLS</b>	Sec 134(b)(4)
(5)	<b>SPECIAL POPULATIONS</b>	
	Prepare Special Populations for High Skill/High Wage/In-demand Employment	Sec 134(b)(5)(A)
	Prepare Students for Nontraditional Fields	Sec 134(b)(5)(B)
	Provide Equal Access for Special Populations	Sec 134(b)(5)(C)
	Prevent Discrimination Based on Status as Special Populations	Sec 134(b)(5)(D)
(6)	<b>WORK BASED LEARNING</b>	Sec 134(b)(6)
(7)	<b>EARLY COLLEGE CREDIT</b>	Sec 134(b)(7)
(8)	<b>COORDINATION WITH HIGHER EDUCATION IN FACULTY DEVELOPMENT</b>	
	All Students	Sec 134(b)(8)
	Underrepresented Groups	Sec 134(b)(8)
(9)	<b>PROCESS FOR ADDRESSING DISPARITIES AND GAPS</b>	Sec 134(b)(9)
	Achieving Local Performance Measures	
	Reducing Gaps and Disparities	
	Strategy Absent Meaningful Progress	
<b>SECTION 135: LOCAL USE OF FUNDS</b>		
(10)	<b>CAREER EXPLORATION &amp; DEVELOPMENT</b>	Sec 135(B)(1)
(11)	<b>PROFESSIONAL DEVELOPMENT</b>	Sec 135(B)(2)
(12)	<b>HIGH SKILL, WAGE, IN DEMAND PREP</b>	Sec 135(B)(3)
(13)	<b>INTEGRATION OF ACADEMICS INTO CTE</b>	Sec 135(B)(4)
(14)	<b>INCREASE STUDENT ACHIEVEMENT</b>	Sec 135(B)(5)
(15)	<b>EVALUTON OF PROGRAMS</b>	Sec 135(B)(6)
(16)	<b>POOLING OF FUNDS</b>	Sec 135(c)
(17)	<b>ADMINISTRATIVE FUNDS</b>	Sec 135(d)

**SECTION 113: ACCOUNTABILITY**

**(18) BASELINE AND TARGETS**

Sec 113b)(A)(ii)

- Factors Influencing Targets for 1P1
  - Factors Influencing Targets for 2P1
  - Factors Influencing Targets for 3P1
  - Additional Information
- 

**LOCAL APPLICATION ELEMENTS**

The template that follows is of the same general format as found in the Perkins Portal. Once information is entered into the portal, it is submitted to ADHE for review and approval. The Annual Plan cannot be finalized until the Local Application is approved.

**Section 134-Local Application**

Based upon results of the Comprehensive Needs Assessment and input from key stakeholders, the Local Application details how needs will be addressed, which programs and services will be supported for the four-year duration of the Local Application, and establishes performance targets. Perkins funds may not be used for activities that were not identified in the needs assessment process. It is critical that gaps and deficiencies identified during the assessment phase be prioritized for maximum impact on program improvement and performance target success. If Perkins funds will not be used to support particular areas, describe what the college is doing with institutional or other funds. [Sec 134(b)(1)]. The Local Application also addresses Section 135 Local Uses of Funds. There is some overlap in Section 134 and 135 and references to each are provided as needed but separate entries are required for each section. Performance targets required in Section 113 are included in the Local Application,

- (1) Describe thoroughly the results of the Comprehensive Needs Assessment conducted and how needs were prioritized. [Sec 134(b)(1)]**

**Student Performance Analysis Findings**

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**Other Needs Assessment Findings**

--

**How Needs Were Prioritized**

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- (2) Based on findings in the needs assessment, describe the career and technical education course offerings and activities that the eligible recipient will provide with funds under this part, including not less than 1 program of study approved by the State.**

Which programs and services will be supported by Perkins funds during July 1, 2020 through June 30, 2024? These should be general areas from which specific activities will be drawn for funding in annual plans. These areas may be expressed as specific program areas (such as Allied Health or Culinary) or broader activities (such as adjunct training or developing work based learning

opportunities). If a specific program area is selected, any activities associated with that program would be permissible. Broader areas will require more specific detail.

**Activities Supported with Perkins Funds [Sec 134 (b)(2)]**

Focus Area 1:

*(Multiple focus areas will be available in the portal.)*

**Required Program of Study [Sec 134 (b)(2)]**

*(Only the Program of Study template is required to be uploaded through the Portal but supporting documentation such as articulation agreements and course equivalencies will be reviewed during compliance procedures.*

Describe how the results of the Comprehensive Needs Assessment **informed the selection** of the specific career and technical education programs and activities selected to be funded. [Sec 134 (b)(2)(A)]

Describe any **new programs** of study that will be developed and submitted to the state for approval. [Sec 134 (b)(2)(B)]

Describe how **all students will learn about career and technical education** course offerings and whether each course is part of a career and technical education program of study. [Sec 134 (b)(2)(C)]

Describe how **students who are members of special populations will learn about career and technical education** course offerings and whether each course is part of a career and technical education program of study. [Sec 134 (b)(2)(C)]

- (3) Describe how the college, in collaboration with local **workforce development boards** and other local workforce agencies, one-stop delivery systems described in section 121(e)(2) of the Workforce Innovation and Opportunity Act (29 U.S.C. 3151(e)(2)), and other partners, will provide—

**Career exploration and career development** coursework, activities, or services. [Sec 134 (b)(3)(A)]

Career information on employment opportunities that incorporate the most up to-date information on high-skill, high-wage, or in-demand industry sectors or occupations, as determined by the comprehensive needs assessment. [Sec 134 (b)(3)(B)]

An organized system of career guidance and academic counseling designed to aid students, in making informed plans and decisions about future education and career opportunities and programs of study to students before enrolling and while participating in a career and technical education program. [Sec 134 (b)(3)(C)] See also Local Uses of Funds [Sec 135(b)(1)]

- (4) Describe how the college will offer programs and activities which integrate challenging academic standards aligned with technical instruction. [Sec 134 (b)(4)] See also Local Uses of Funds [Sec 135(b)(4)]

- (5) Describe how the college will—

Provide CTE instructions and activities to prepare all students including special populations with the skills necessary to pursue careers in high-skill, high-wage, or in-demand industry sectors or occupations that will lead to self-sufficiency. [Sec 134 (b)(5)(A)] See also Local Uses of Funds [Sec 135(b)(3)]

Prepare CTE participants for nontraditional fields. [Sec 134 (b)(5)(B)]

Provide equal access for special populations to career and technical education courses, programs, and programs of study. [Sec 134 (b)(5)(C)]

Ensure that members of special populations will not be discriminated against on the basis of their status as members of special populations. [Sec 134 (b)(5)(D)]

- (6) Describe the work-based learning opportunities that the college will provide to students participating in CTE programs and how it will work with representatives from employers to develop or expand work based learning opportunities for CTE students, as applicable. [Sec 134 (b)(6)]

- (7) Describe how the college will provide high school students participating in CTE programs with the opportunity to gain [postsecondary credit](#), such as through dual or concurrent enrollment programs or early college high school, as practicable. [Sec 134 (b)(7)]

- (8) Describe how the college will coordinate with the eligible agency and institutions of higher education to support the [recruitment, preparation, retention, and training](#), including [professional development](#), of teachers, faculty, administrators, and specialized instructional support personnel and paraprofessionals who meet applicable State certification and licensure requirements (including any requirements met through alternative routes to certification), including individuals from groups underrepresented in the teaching profession. [Sec 134 (b)(8)] See also Local Uses of Funds [Sec 135(b)(2)]

[All](#) Students

[Underrepresented](#) Groups

- (9) Describe the process to be used by the college to ensure support for implementation of CTE programs that result in [increasing student achievement](#) on the local levels of performance and address [disparities or gaps in performance](#) in each of the plan years, and if no meaningful progress has been achieved prior to the third program year, a description of the additional actions the college will take to eliminate those disparities or gaps. The description should [address the process](#) that will be used instead of specific activities. (Specific strategies are addressed in the Comprehensive Needs Assessment. [Sec 134 (b)(9)] See also Local Uses of Funds [Sec 135(b)(5)]

[How](#) local performance levels will be achieved

[How](#) Disparities and Gaps Will Be Addressed

Actions to be Taken [Absent Meaningful Progress](#) by Third Year

**Section 135-Local Uses of Funds**

Perkins recipients are required to provide certain services as a condition of receiving funding. The Local Application must identify how the college is meeting these requirements. The requirements can be met with either Perkins or institutional funds but a description of how they will be met is required regardless of funding. There may be some duplication in Sections 134 and 135 but information is needed individually for each section to assure compliance during federal monitoring.

(10) Describe how the college will provide **career exploration and career development activities** through an organized, systemic framework designed to aid students in making informed plans and decisions about future education and career opportunities and programs of study. [Sec 135 (b)(1)] See also Local Application [Sec 134(b)(3)(C)]

(11) Describe how the college will provide **professional development** for teachers, faculty, administrators, instructional support personnel, career guidance and academic counselors or paraprofessionals. [Sec 135 (b)(2)] See also Local Application [Sec 134(b)(8)]

(12) Describe how the college will provide within career and technical education the skills necessary to pursue careers **in high-skill, high-wage, or in-demand** industry sectors or occupations. [Sec 135 (b)(3)] See also Local Application [Sec 134(b)(5)(A)]

(13) Describe how the college will support **integration of academic skills into career and technical education** programs and programs of study. [Sec 135 (b)(4)] See also Local Application [Sec 134(b)(4)]

(14) Describe how the college will plan and carry out elements that support the implementation of career and technical education programs that result **in increasing student achievement of the local levels of performance** targets. [Sec 135 (b)(5)] See also Local Application [Sec 134(b)(9)]

(15) Describe how the college will develop and implement **evaluations of the activities** carried out with Perkins funds, including evaluations necessary to complete the Comprehensive Needs Assessment and the analysis of local accountability performance reports. [Sec 135(b)(6)]

(16) The college may **pool** a portion of its Perkins funds received under this Act with one or more Perkins eligible recipients to support implementation of programs of study through the professional development activities described in Sec 135(b)(2). If pooling will not be used, enter N/A. [ Sec. 135(c)]

(17)The college shall not use more than 5 percent of Perkins funds for costs associated with the [administration](#) of activities that are necessary for the proper and efficient performance of its duties to fulfill obligations related to the Perkins grant. Use of administrative funds will be described in the Annual Plan. If the college has negotiated an indirect cost rate, it will be uploaded into the Portal. [Sec. 135(d)]

**Section 113-Accountability**

The college shall establish performance targets for each year of the period covered by the Local Application. Baselines will be based on the average of actual results from the three most recent program years. The state will determine local levels of performance for colleges but provide an opportunity to negotiate should local conditions warrant. [Sec 113(b)(2)(B)] and [Sec 113(b)(4)]

Targets shall:

- Be expressed in percentage form.
- Require the college to continually make meaningful progress.
- Take into account unanticipated circumstance that may have contributed to extraordinarily high or low baselines.
- Be available to stakeholders for comment and input.

**Core Indicator Performance Targets**

**(18) Enter performance targets for each of the four years covered by the Local Application. Each year should include an increase for meaningful progress.**

Core Indicator	Baseline	2020-21	2021-22	2022-23	2023-24
1P1: Retention/Placement					
2P1: Credential Attainment					
3P1: Nontraditional Participation					

[Factors influencing targets](#) for 1P1: Retention/Placement

[Factors influencing targets](#) for 2P1: Credential Attainment

[Factors influencing targets](#) for 3P1: Nontraditional Participation

Provide any [additional information](#) that should be considered when negotiating core indicator targets.

## Section 6 Annual Plan

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### FUNDS

Grant awards for the coming grant year are announced in late April-early May. This award is based on estimates from the U.S. Department of Education and are projected amounts loaded into the portal for annual plans. Official award letters are sent to presidents and chancellors by July 1.

The funding formula calculates the percentage of eligible students you serve from the state total of *funded concentrators*. This federal funding is intended to improve CTE programs of study. Perkins V law outlines in Section 134(b)(1) through (12) that colleges must use funds for certain activities.

### LOCAL PLAN SUBMISSION

Every year, grantees submit into the portal a plan of proposed activities and budget expenditures that support the needs identified in the Comprehensive Local Need Analysis (CLNA). The college, along with stakeholders, has identified the best use of funds to accomplish goals. The local plan describes how the college will address the required uses of funds from Perkins V as well as the allocation for each. This allocation will be outlined in a corresponding budget that may be adjusted with approval prior to obligating funds.

### REQUIRED USES

In previous Perkins legislation, use of funds was divided into required and permissive categories. In Perkins V, there are six required uses with twenty permissive ones that are often included as options under the required uses. Required uses can be met with Perkins or non-Perkins funds.

### REQUIRED AND PERMISSIVE SUMMARIES

Required	Permissive Options
Provide career exploration and career development activities	<ul style="list-style-type: none"> <li>• Introductory courses focused on career development, including nontraditional fields</li> <li>• Career and labor market information</li> <li>• Development of graduation and career plans</li> <li>• Career guidance and academic counseling</li> <li>• Other activities that advance knowledge of career opportunities and assist students to make informed decisions</li> <li>• Strong experience in and understanding of all aspects of an industry</li> </ul>
Provide professional development	<ul style="list-style-type: none"> <li>• Individualized academic and CTE instructional approaches, including integration of academic and technical standards and curricula</li> <li>• Ensure labor market info is used to inform programs and guidance</li> <li>• Provide faculty and staff with opportunities to advance knowledge and skills, understand all aspects of an industry including latest workplace technologies and standards</li> <li>• Support administrators in managing CTE programs</li> </ul>

	<ul style="list-style-type: none"> <li>• Implement strategies to improve student achievement and close gaps in performance of CTE programs</li> <li>• Provide faculty and staff with opportunities to improve pedagogical practices</li> <li>• Train staff to provide appropriate accommodations for individuals with disabilities</li> <li>• Train staff to effectively teach students with disabilities and who may be English learners</li> <li>• Train for effective use of community spaces that provide access to tools, tech and knowledge for learners and entrepreneurs, such as makerspaces or libraries</li> </ul>
<p>Provide within CTE the skills necessary to pursue careers in high-skill, high-wage, or in-demand industry sectors or occupations.</p>	
<p>Support integration of academic skills into CTE programs</p>	<ul style="list-style-type: none"> <li>• Activities at postsecondary level that improve academic skills of CTE students</li> </ul>
<p>Improve student achievement on performance indicators</p>	<ul style="list-style-type: none"> <li>• Aligned programs of study</li> <li>• Sustainable relationships among education, industry and community stakeholders</li> <li>• Expand opportunity for early college credit within CTE programs of study</li> <li>• Provide appropriate equipment, technology and instructional materials aligned with business and industry needs</li> <li>• Provide work-based learning opportunities, including simulated work environments</li> <li>• Provide industry-recognized certification examinations or other assessments leading to a recognized postsecondary credential</li> <li>• Recruit and retain CTE faculty and staff</li> <li>• Coordinate with education and workforce development programs that provide transition-related services</li> <li>• Expand distance CTE and blended-learning programs</li> <li>• Improve career guidance and academic counseling programs</li> <li>• Support integration of employability skills into CTE programs</li> <li>• Support programs that increase access to and success in STEM fields for students in underrepresented groups in these fields</li> <li>• Provide CTE for adults or out-of-school youth to complete high school or upgrade technical skills</li> <li>• Support CTSOs including preparation for competitions aligned with CTE programs</li> <li>• Make all forms of instructional content widely available which may include use of open educational resources</li> <li>• Support integration of arts and design skills into CTE programs</li> <li>• Partner with intermediaries to improve training, development of public-private partnerships, systems development, capacity-building and scalability for delivery of high quality CTE programs</li> <li>• Support to reduce/eliminate out-of-pocket expenses for special population students participating in CTE</li> <li>• Other activities to improve CTE programs</li> </ul>

<p>Develop and implement evaluations of the activities carried out with Perkins funds, including funds necessary to complete the local needs assessment and the local report.</p>	
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**ASSURANCES**

The Perkins Coordinator must electronically sign a statement of assurances that guarantees compliance with regulations, policies, guidelines, and requirements included in EDGAR and the Uniform Grant Guidance as they relate to the use of federal funds.

In the case of a consortia, only the administrative college will complete the annual plan for the consortia. The plan activities will be based on need rather than percentages of eligible concentrators per institution.

**FOCUS AREAS**

Funded activities will support identified gaps and disparities for postsecondary students from the CLNA. These activities must also be of sufficient size, scope, and quality to be deemed effective to support continuous improvement of the Perkins core indicators.

**COVER PAGE**

The cover page section is automatically created by the system once annual plans are open for the grant year. The cover page section serves many functions, beginning with a history of all transactions with owner and dates. The most useful information is the ability to communicate between the user/state office staff with comments for rejections and other relevant notes. The Coordinator will find the annual plan assurance acceptance here.

**ACTIVITY SECTION**

The activity history and information is created when the Coordinator creates the new activity via by the Add Proposed Activity button. The Coordinator will choose the category from a drop list consisting of deficient and non-deficient areas. A college who has met targets in the previous year will choose non-deficient areas for the activity. A college who hasn't met at least 90% of a core indicator target will need to choose a deficient area to address before eligible to add non-deficient area activities. Single focus areas (as loaded from the Applicant's CLNA) are encouraged. All focus areas may be used for activities that clearly impact the entirety of need, i.e. a professional development activity for the faculty/staff on customer service.

The cluster selection is preloaded into a drop list of career clusters identified at the college. This list was created by information from the Coordinator in the Local Application.

A title is necessary to identify the activity and should be concise and clear of purpose.

Once the Coordinator has created the activity with Category, Focus Area, Cluster, and Title, the Coordinator should click the hyperlinked title in the list of activities. This action will open a new window

for entry of the Narrative, targeted Perkins Indicators, and Activity Costs. Please click through and enter all sections of Activity Information before submitting it to the state office for approval.

### **ACTIVITY NARRATIVE**

Activity narrative must briefly describe, justify, and measure benefit to the CTE students. Each activity is also assigned to improve a specific core indicator.

### **ACTIVITY PERKINS INDICATORS**

The Coordinator should choose the most relevant Core Indicator that will be impacted by the activity. Although most activities can be targeted to one Core Indicator, there are instances where an activity may impact more than one.

### **ACTIVITY COSTS**

Activity costs are budgeted here and are an estimate rather than a firm amount. For the purpose of reimbursement requests, it's best to overestimate as a request cannot be made on a cost line lacking sufficient funds. Remaining balances on any unused costs can be manually corrected and moved to unallocated.

Equipment remaining costs after all quantities of equipment are purchased will automatically return to the unallocated balance.

A budget must be included in the activity submission. These estimations of cost may be adjusted later. The Coordinator will enter a concise description that serves as a title for the budget cost item as well as indicating the Cost Type from a drop list.

Equipment budget lines will always need to be put in individually for specific items. There can be a bulk quantity indicated if all equipment items are the same description.

If an equipment line will not include a sales/use tax cost until charged later from Department of Finance Administration to the college, the Coordinator may add an estimated sales/use tax line for that charge, i.e. "Machining Lathe c500 Sales/Use Tax" as a separate entry from the "Machining Lathe c500".

If an activity includes several small items that are Supplies, the activity cost line may be titled for the general purpose and charged against until that line is depleted of funds. An example would be a culinary activity that includes many supplies charged/reimbursed at different points in time. The description of the budget line could be "Culinary Modernization Supplies" of \$1000. The college could submit purchase reimbursements against this line in three different requests.

## **ADMIN**

A percentage of up to 5% of funds may be allocated to the administration of the grant. For a direct cost administration activity, cost lines of different types may be entered. For an indirect cost activity, the Coordinator may enter "Indirect Cost Rate" as the title and a description of indirect cost rate letter on file.

Direct cost rates must not exceed 5% of the expended grant at the end of the year.

## **UNALLOCATED**

Any funds not assigned to an activity remain unallocated. Seventy-five percent of a grant award must be allocated to activities prior for approval of the annual plan at the beginning of the grant year.

## **EQUIPMENT**

Equipment purchases must be made no later than January 1 of the program year and be tagged and inventoried. Inventory tag numbers are logged into the portal at the time of a purchase reimbursement request.

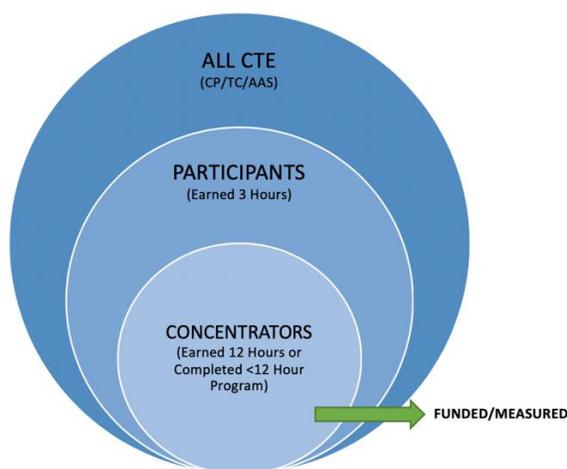
## Section 7 Accountability

SEC. 113

Perkins recipients are held accountable for effective use of funds and are required to show meaningful program improvement each year. The Perkins performance accountability system measures performance in three core indicator areas. Other than UI wage data used to determine placement in employment, all information used to calculate state and local performance will be extracted from the Arkansas Higher Education Information System (AHEIS).

### STUDENT CLASSIFICATION DEFINITIONS

There are three classifications of CTE students for Perkins purposes (Participants, Concentrators, and Funded Concentrators).



- **Postsecondary Participant**

The term 'CTE Participant' means an individual who has completed not less than one course in a career and technical education program or program of study.

*(A student who has declared intent, is enrolled in a CTE program area, and earned a minimum of three semester credit hours in a CTE program of study in the current academic year.)*

SEC 3. (13) CTE Participant

- **Postsecondary Concentrator**

The term 'CTE Concentrator' means at the postsecondary level, a student who has:

- a) Earned at least 12 credits within a career and technical education program or program of study;  
or
- b) Completed such a program if the program encompasses fewer than 12 credits or the equivalent in total.

*(A student who has declared intent, is enrolled in a CTE program area, and earned the required semester credit hours in the current or previous academic year. Once a student is counted as a Concentrator, concentrator status will be retained unless the student does not complete any hours in a given academic year. Students in less-than-12-hour programs will only be Concentrators upon completing the program.)*

SEC 3. (12) CTE Concentrator

- **Funded Concentrator**

The postsecondary funding formula is based on Concentrators who receive Pell or BIA (Bureau of Indian Affairs) assistance. Counts are compiled from data taken from the most current year available. *(Students who were Concentrators in PYE19 that received Pell/BIA are Funded Concentrators in PYE21.)*  
*Sec. 132(a)(2) Formula*

## CORE INDICATORS OF PERFORMANCE

Sec. 113(b)(2)(B)

Perkins V defines three core indicators of performance for CTE Concentrators at the postsecondary level. The institution must report data that is valid, reliable, timely and complete so that performance results for core indicators will be accurate and meaningful. For reporting purposes, a Concentrator cohort is determined for a specific year. That cohort is then tracked and reported in the following year which results in a one-year lag in reporting. (Concentrators in 2019 will be tracked during 2020 to determine success as required for each core indicator (remained enrolled, were in employment, received a post-program credential, etc.) Performance is then reported in the 2020 CAR and in local accountability reports.)

For clarification, the definition of “after program completion” in the Act can be confusing. For example, it is not logical to measure “retention” in 1P1 “after program completion.” ADHE will retain the legal language but with the understanding that program completion means that a student is no longer enrolled in college and performance results will be calculated accordingly.

### 1. 1P1-Retention/Placement

The percentage of CTE Concentrators who, during the second quarter after program completion:

- a) Remain enrolled in postsecondary education
- b) Are in advanced training
- c) Are in military service
- d) Are in a service program that receives assistance under Title I of the National and Community Service Act of 1990 (42 U.S.C. 12511 et seq.)
- e) Are volunteers as described in section 5(a) of the Peace Corps Act (22 U.S.C. 2504(a), or
- f) Are placed or retained in employment

**Numerator:** The number of CTE Concentrators who, during the second quarter after program completion, remained enrolled in postsecondary education; were placed or retained in employment; were in advanced training; were in military service; were in a service program of the National and Community Service Act; or were in the Peace Corps.

**Denominator:** The number of CTE Concentrators that were enrolled in the academic year previous to the tracking year.

**Formula:** Results for this indicator are based on a Concentrator cohort from the academic year previous to the tracking year (Enrolled in AY2017, tracked for success in AY2018 and reported in the December 2018 CAR). This lag in reporting is necessary due to the availability of enrollment and employment data at the time performance results are calculated. For 1P1, “after program completion” is defined as a student that remains enrolled or is placed in employment. The retention portion includes Concentrators who were enrolled the previous academic year and who remain enrolled in postsecondary education (either at the reporting college or another college or university) in the following academic year. The placement portion includes Concentrators from the previous academic year who were employed during

the second quarter following program completion and calculated using UI wage records. Results from other placement options will be added as information becomes available.

## 2. 2P1-Credential Attainment

The percentage of CTE Concentrators who receive a recognized postsecondary credential during participation in or within 1 year of program completion.

The term ‘recognized postsecondary credential’ has the meaning given in section 3 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3102).

- a) Industry-recognized certificate or certification
- b) Certificate of completion of an apprenticeship
- c) License recognized by the State or Federal Government
- d) Associate or baccalaureate degree

*(TEGL: DoL Training and Education Guidance Letter)  
(Sec. 3. (43) Definitions)*

**Numerator:** The number of CTE Concentrators that received a college credential; a third-party, industry-based certification; apprentice certification; or received a government recognized license during participation in or within one year of program completion.

**Denominator:** The number of CTE Concentrators that were enrolled in the academic year previous to the tracking year.

**Formula:** Results for this indicator are based on a Concentrator cohort from the academic year previous to the tracking year. This lag in reporting is necessary in order to meet the “within one year of program completion” requirement. For 2P1, “after program completion” is defined as a student that completed the course of study and receives an academic award, or receives an industry-based credential or certification even though they may not have received an academic award. The indicator measures both academic credentials awarded by the college and industry-based technical credentials awarded by third parties. Results from other credential options will be added as information becomes available.

## 3. 3P1-Nontraditional Participation

The percentage of CTE Concentrators in career and technical education programs and programs of study that lead to nontraditional fields.

**Numerator:** The number of gender nontraditional CTE Concentrators that were enrolled in nontraditional CTE programs in the academic year previous to the tracking year.

**Denominator:** The number of Concentrators that were enrolled in nontraditional CTE programs in the academic year previous to the tracking year.

**Formula:** Results for this indicator are based on a Concentrator cohort from the academic year previous to the tracking year. The denominator is the total enrollment for all programs designated as either male or female nontrad. The numerator is the number of males in female nontrad programs plus the number of females in male nontrad programs.

## SPECIAL POPULATIONS

The Perkins Act defines special populations as individuals who are members of any of the following groups. Full definitions can be found in Section9-Other Information.

- Individuals with disabilities
- Individuals from economically disadvantaged families
- Individuals preparing for employment in nontraditional occupations
- Individuals who are single parents
- Individuals who are out-of-workforce
- Individuals who are English learners
- Individuals who are homeless
- Youth who are in or have aged out of foster care
- Youth with a parent who is a member of the armed forces or is on active duty

## HIGH SKILL, HIGH WAGE, IN-DEMAND OCCUPATIONS

Definitions for high skill, high wage and in-demand occupations are jointly determined by the Arkansas Division of Workforce Services, the Division of Career and Technical Education, and the Division of Higher Education.

High Wage: Wages which exceed 20 percent above the average wage for all Arkansas occupations. Wages are available at <http://www.discover.arkansas.gov/Industry/State-Employment-and-Wages-by-Industry>. (High wage example: Average weekly wage for all industries is \$900. A weekly wage of \$1,080 will be considered high wage.)

High Skill: A pathway that leads to a baccalaureate degree or leads to an occupation that requires certification or licensure.

In-demand: Developed and approved by the Arkansas Division of Workforce Services and based on the top five growth occupations within the top 25 growth industries. In-demand occupations are determined at both state and regional levels and can be found at <http://www.discover.arkansas.gov/Occupation/Projected-Employment-Opportunities-List>

## NEGOTIATING TARGETS

Sec. 113 (b)(4)(A-B). Local Levels of Performance

Perkins V requires that the state include performance targets for four years in the State Plan and describe the methodology used to establish continuous improvement in performance. Once the State Plan and the performance targets are approved, the same methodology will be applied to local recipients. State staff provides baseline data for each core indicator, a description of the methodology to be used to establish local targets, and the date for which negotiations will conclude. The recipient may accept the proposed target or negotiate an alternate one with justification. The state retains final authority on local performance targets.

- Recipients shall agree to accept the State levels of performance or negotiate with the State for a new target.
- Recipient must set levels using valid and reliable data that measures the differences within the State in actual economic conditions and the ability of the State/recipient to collect and access valid, reliable and cost-effective data.

- Recipient must make continual and meaningful progress toward improving performance of all CTE Concentrators, including subgroups.
- Targets may be adjusted under certain conditions.
  - a) Comparable to other recipients.
  - b) Must be higher than the average actual performance of the two most recently completed program years (unless unanticipated circumstances).
  - c) Must take into account extent to which adjusted levels will advance goals set forth in the State Plan.
  - d) May not be adjusted if in improvement plan status.
- Developed with input from prescribed stakeholders in Sec. 122 (c)(1)(A).
- Developed for same time period as State Plan.
- Must disaggregate performance data:
  - a) By subgroup and identify and quantify any disparities or gaps in performance on any subgroup or special population compared to all CTE Concentrators.
  - b) By award level (Certificate of Proficiency, Technical Certificate or Associate of Applied Science degree).
  - c) By advanced training.
  - d) By military service, National and Community Service, or Peace Corps.
  - e) By high skill/wage/demand sectors

## IMPROVEMENT PLANS

### Sec. 123. (b)

Perkins legislation requires that ADHE evaluate the performance of each postsecondary institution in each core indicator area. If the institution is not making substantial progress, state staff is required to make an assessment of needs, enter into an improvement plan to assist the institution in overcoming deficiencies, and conduct regular evaluations of progress being made.

A core indicator is considered deficient if it falls below 90% of the negotiated target and an improvement plan is required. The improvement plan:

- Must include an analysis of performance disparities or gaps in subgroups.
- Must describe actions that will be taken to address gaps.
- Should involve appropriate stakeholder consultation during analysis of cause and selection of possible actions.
- Must be implemented in the first year following the year in which performance was deficient.
- Must be addressed prior to focus areas that were identified in the needs assessment and Local Application.
- May require a revision to the Local Application as a result of updating the student performance section of the Comprehensive Needs Assessment.
- Prohibits the adjustment of performance targets while in improvement plan status.
- Is submitted into the Perkins Portal as part of the Annual Plan submission.

ADHE will provide technical assistance if the college is not implementing the improvement plan or is not making substantial progress in meeting performance levels. The following general guidelines for improvement plans will be used to monitor performance results and improvement plans.

- **IP Year 1:** State staff will monitor implementation of the Improvement Plan and provide technical assistance.

- **IP Year 2:** State staff will continue to monitor and provide technical assistance but may also prescribe uses of funds.
- **IP Year 3:** Absent meaningful progress by the third year, the local recipient will be required to adjust its Local Application based on new student performance data.

### REPORTING PERKINS DATA

With the exception of UI (Unemployment Insurance) wage data used to calculate 1P1-Retention/Placement, all data for Perkins accountability reports is obtained from the Arkansas Higher Education Information System (AHEIS). ADHE provides a manual to appropriate institutional research staff at each college that contains instructions for preparing the two Perkins specific files.

- **Perkins I-Special Populations**

The institution must provide special population information on all CTE students. This information is collected either automatically in the student management system or manually via surveys in the classroom. The institution should have written local procedures that describe the process used to collect and report data in a manner that ensures validity, reliability, timeliness, and completeness. Requirements of the written policy can be found in the Reference section at [www.adheperkins.com](http://www.adheperkins.com).

- **Perkins II-Supplemental Credentials**

The institution must report results of all non-academic credentials that it has access to. Currently this includes third-party assessments and apprenticeships. These results are reported during the academic year in which results are received by the institution, not the academic year in which the student was enrolled or when the supplemental credential was attempted. All students should be reported if an assessment or apprenticeship result is known. The institution should have written local procedures that describe the process used to collect and report data in a manner that ensures validity, reliability, timeliness, and completeness. Requirements of the written policy can be found in the Reference section at [www.adheperkins.com](http://www.adheperkins.com).

## Section 8

### Financial Management

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#### FEDERAL AUTHORIZATIONS

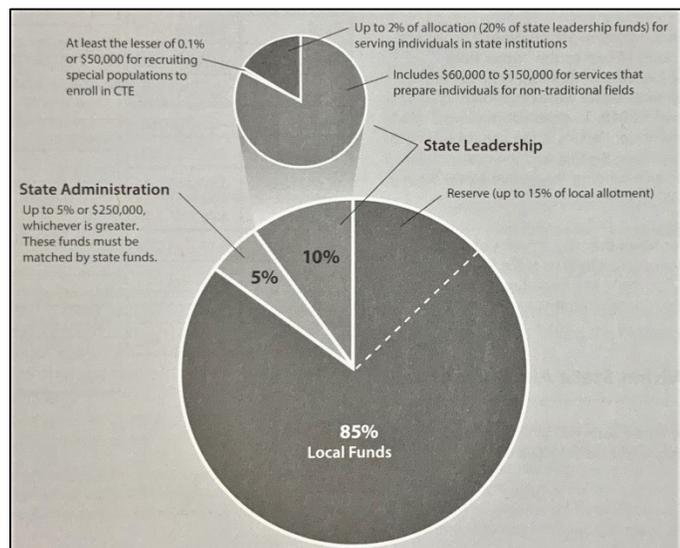
Congress appropriates Perkins funds through the U.S. Department of Education, Office of Career Technical and Adult Education (OCTAE). Perkins funds are awarded to States based upon formulas prescribed by the Perkins V legislation. The postsecondary formula is based upon the number of Perkins concentrators (students with a declared major in a CTE program who have completed a required threshold of hours) that received Pell Grant or Bureau of Indian Affairs assistance.

#### STATE ALLOTMENT PROCESS

In Arkansas, the receiving state agency is the Arkansas Department of Education, Division of Career and Technical Education (DCTE) and the allocation is usually in the \$13 million range. Of the total, 15% is reserved for use by the State for administration and leadership activities and 85% is set aside as basic grants for distribution to local institutions. Of the 85% available for the basic grants, DCTE/ADHE may withhold up to 15% for reserve fund activities. A breakdown of the State's allocation is shown here. (Perkins. Sec 111)

DCTE has a staff that administers funding for secondary schools. Through a Memorandum of Understanding (MOU), DCTE authorizes the Arkansas Division of Higher Education (ADHE) to provide oversight of basic grants at colleges and universities for programs that are less than baccalaureate level programs.

OCTAE generally announces funding levels in mid-April which is the first step in the local allocation process. Even though funding levels are predetermined by formula, institutions must develop programs that meet specified federal and state requirements, and submit an annual application (Annual Plan) to Perkins state staff for review and approval. This annual application must be based on the focus areas of need identified in the four-year Local Application. Local coordinators are responsible for implementation of approved activities and state staff monitors progress and provides technical assistance and support as needed.



#### LOCAL AWARDS PROCESS

The 85% reserved for distribution to local institutions is further split between secondary (75%) and postsecondary (25%). This split is authorized in the Perkins State Plan. Upon OCTAE notification of state funding levels, DCTE/ADHE determine whether amounts will be withheld for reserve fund competitive

grants and the final dollar amount available for postsecondary institutions. Once the postsecondary amount is determined, ADHE calculates the funding formula based on the number of Concentrators receiving Pell/ BIA assistance for each institution. Perkins state staff posts this information in the portal and notifies coordinators. Official notification of the award is made by letter to the president/chancellor upon receipt of the Award Letter from OCTAE. This is generally after July 1.

### **RESERVE FUND**

From the 85% of the state allocation that is distributed to secondary and postsecondary recipients, the State may choose to withhold up to 15% and award grants to high schools and colleges for specific purposes. (Perkins Sec 112) Use of those funds is limited to activities described in Section 135: career development; professional development; preparation for high skill, high wage or in demand occupations; integration of academic and technical instruction; student achievement; and evaluation of CTE programs.

Grants are available to colleges that meet at least one of the following descriptions:

- Located in a rural area (college located in a county with less than 5% of total state population)
- Serves a high percentage of CTE concentrators or CTE participants serves (more than 50% of students are enrolled in CTE programs)
- Serve a high number of CTE concentrators or CTE participants (serves more than 500 CTE students)
- Has demonstrated disparities or gaps in performance among subgroups and special population (at least 10 gaps in performance can be identified when looking at performance at the CIP level)

Grants awarded must:

- Foster innovation through the identification and promotion of promising and proven career and technical education programs, practices, and strategies, which may include programs, practices, and strategies that prepare individuals for nontraditional fields; or
- Promote the development, implementation, and adoption of programs of study or career pathways aligned with State-identified high-skill, high-wage, or in-demand occupations or industries.

A request for proposals will be released to Perkins coordinators with grant requirements, schedule and selection criteria. ADHE reserves the right to specify the nature of projects that will be considered for funding. Submissions are blind-reviewed based on the rubric contained in the grant announcement. Once recipients are notified, an MOU is prepared to authorize expenditure reimbursement. Reimbursement for reserve funds is different than basic grant funds and is submitted through a manual process until the Reserve Fund module of the Perkins Portal is completed.

### **AVAILABILITY OF FUNDS AND FIRST QUARTER RULE**

Funds are available for obligation on July 1 assuming that the applicant has submitted its Annual Plan which has been substantially approved. Funds expended prior to substantial approval will not be reimbursed.

Because only 25% of the total federal funds are available to the state during the first quarter, local institutions cannot be reimbursed for more than 25% of its grant during the first quarter. The institution

may obligate or expend funds in excess of 25% but may only be reimbursed up to 25% prior to October 1. There are no restrictions on level of expenditures in the remaining nine months of the program year.

### **ASSURANCE AND APPROVAL OF ANNUAL PLAN**

The approved annual plan serves as a contract between DCTE and the institution receiving the federal funds. To receive funds, the recipient must assure adherence to all federal and state laws and regulations. This assurance is incorporated into the Annual Plan which requests that the submitting local coordinator attest that appropriate college personnel are aware of the requirements and agree to the terms.

### **BUDGET CATEGORIES**

The annual plan budget has eight budget categories and the institution must request reimbursement according to them, regardless of how the college may classify expenses.

#### **Administration**

- The recipient may elect to recover administration costs through either a direct or an indirect method.
  - If indirect, the full 5% is reimbursable. The recipient must have an indirect cost rate letter from the U.S. Department of Health and Human Services or the Arkansas Division of Higher Education.
  - If direct, the amount is limited to 5% of grant funds actually expended, not 5% of the grant awarded.
- Use of admin funds is limited to functions necessary to execute the grant and does not include program improvement activities. (Perkins. Sec 3)
- The administrative activity in the annual plan must state which method is being used. Indirect requires only the statement: "Indirect cost rate letter on file with ADHE." Direct requests must be described in the annual plan and documented for reimbursement. If salaries are to be paid with admin funds, the Admin activity must state this and be documented with a PAR (personnel activity record, also referred to as time and effort) in order for salaries to be reimbursed. "Expenses related to administering the grant" is not sufficient.

#### **Salaries and Benefits**

- Includes salary/benefits compensation for regular or extra help employees that perform direct services for an activity.
- A Personnel Activity Record (PAR) timesheet must be maintained for each employee paid from this category. (EDGAR 200.430)
- The expense should be coded to this category if the employee receives a W-2 for tax purposes.

#### **Equipment**

- This budget category is used only for assets that must be tracked to avoid loss. All other items should be coded to Supplies. When purchases are coded to this category, the Perkins Portal will maintain a record of such assets eliminating the need for the coordinator to maintain a separate list.

- EDGAR 200.33 defines Equipment as tangible property having a life expectancy of more than one year and a per-unit cost which equals or exceeds the lesser of the capitalization level established by the not-federal agency or \$5,000.
- For Perkins purposes, capital items, digital devices and other "attractive assets" must be tracked regardless of cost.

### **Supplies**

- All tangible items not included in Equipment are considered Supplies with no requirement for tracking.
- EDGAR 200.94 defines Supplies as any tangible property not considered Equipment. While "computing devices" are considered supplies in EDGAR, Arkansas requires they be considered equipment and tracked.
- Supplies include consumable items which are required to conduct the approved activity over and above regular operational costs and must be used in the classroom for direct instruction.
- Supplies that become the property of the student is not an allowable use of Perkins funds. Classroom sets of materials or instructional support materials is permitted. There are some exceptions for special populations and those should be discussed with ADHE staff before purchase.
- Software is considered supplies and should be coded to this category. It does not have to be tagged and tracked.

### **Professional Development/Travel**

- This category includes travel and conferences for professional development.
- Travel expenses are obligated at the time of travel; use caution for travel that is near the beginning or end of a fiscal year.
- Professional development may be either on or off campus.
- Extreme care should be given when food is purchased as allowability has become much more restrictive. (EDGAR 4<sup>th</sup> Edition, guidance letter, page 301) (See also EDGAR 200.432 and 200.474)

### **Contracted Services**

- Expenses are coded to this category if the payee receives a 1099-MISC for tax purposes. PARs are not required for this position.
- Expenditures for services obtained from consultants or others not employed by the institution are recorded in this section even when services are contracted for professional development. If a contract is signed, the expense should be coded to this category.

### **Industry Certifications**

- This category is limited to purchases of industry certifications. It does not include travel, equipment or other items that might contribute to the student achieving the certification.
- Industry certifications can be purchased for students and faculty. Student certification results must be reported in the Perkins II-Supplemental Credentials file that is used to calculate 2P1-Credential Attainment results

## Other

- Expenses in this category should be rare and fully described.

## REIMBURSEMENTS

Basic grant funds will be distributed on a reimbursement basis for actual expenses incurred. The request will be submitted to state staff at ADHE who will review, approve and forward to DCTE for payment. Requests for reimbursements are submitted through the Perkins Portal. Supporting documentation for each expenditure must be scanned and uploaded into the portal. Supporting documentation for items includes the purchase order, the invoice and a copy of the check that paid the invoice. The documentation for 1) what was ordered (PO); 2) what was billed (invoice); and 3) what was paid (check) must be clear.

The Perkins coordinator and the Perkins fiscal coordinator are the only persons with portal privileges to enter reimbursements requests and the Perkins coordinator is the only person with privileges to actually submit the request. The Perkins coordinator is responsible for assuring the accuracy of fiscal information and the assignment of expenses to appropriate activities and budget categories.

## ANNUAL PLAN CHANGES

Changes to the approved Annual Plan are required prior to purchases on any edits whether in narrative form or cost line(s). Changes must be submitted and approved by state staff prior to obligating funds. Changes are made in the Perkins Portal. The deadline to submit changes is May unless an extension is granted.

## END OF YEAR FINANCIAL REPORT

The End of Year Financial Report is automatically calculated by the Portal. State staff will review to assure that budget categories are not exceeded by 10% of the approved amount and will forward the necessary documents to the Division of Career and Technical Education for final approval. If funds are to be returned, ADHE will notify the coordinator. Return of funds are payable to State of Arkansas.

## COMPLIANCE, MONITORING AND TECHNICAL ASSISTANCE

Monitoring is conducted for the purposes of compliance monitoring and technical assistance. State staff may request that institutional staff other than the coordinator be available during the compliance review. The type review is determined by the level of risk associated with the grant.

Following the compliance review, state staff will provide a written report to the coordinator and the president/chancellor of the institution. In the event of findings, state staff will monitor until the finding is resolved. Details of the finding and required corrective action will be described in the letter sent to the college. The resolution process may consist of the following: a) submission of documentation via email, b) follow-up site visit to ensure resolution, c) delay of reimbursement until finding is resolved.

- **Compliance Review:** Compliance monitoring will review effective use of administrative funds; quality and progress to date of funded activities; fiscal management including inventory and expenditure records; and data and accountability. Records from the current and most recent year may be reviewed. These visits may be on campus or conducted by webinar.

- **Supplemental Monitoring:** More in-depth compliance reviews are conducted with recipients that are at higher risk of non-compliance. A point system is used to determine most at-risk recipients and on-campus visits are scheduled accordingly. At-risk designation can result from coordinator tenure, size of the grant, unused funds, or excessive changes and errors. Supplemental reviews will be conducted on-site.
- **Technical Assistance:** Compliance reviews affords an opportunity for technical assistance. Technical assistance is provided as needed or requested.

### EXPENDITURE ELIGIBILITY TEST

Every Perkins expense must meet certain eligibility requirements. (EDGAR 200.403, 200.404, 200.405) •

**Is it allowable?** Below is a summary of questions to ask while determining if a cost is allowable.

- 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 EDGAR and Uniform Grant Guidance?
- Is the proposed cost consistent with the underlying needs of the program? (Was data used to determine the need? Do funds target an area of weakness?)
- Is the proposed cost necessary, reasonable, allocable and legal under state and local law?
- **Is it reasonable and necessary?** The expense must be necessary for the successful performance of the grant, must follow sound business practices, and be of fair market price. Would a prudent person judge the expense to be necessary and reasonable?
- **Is it allocable?** Expense is relative to the value received (proration of an expenditure to CTE use; Perkins portion of a tutoring activity must be limited to percent of CTE students served). It is the burden of the recipient to document CTE usage.
- **Is it legal?** The expense must comply with federal, state, and local laws.
- **Is it obligated in the correct program year?** The expense must be obligated within the grant period—July 1-June 30. Funds may not be obligated until an annual plan has been fully approved or deemed to be in “substantially approvable form.”

Different type expenses have different obligation dates. (EDGAR 76.707) Common obligation dates include:

- Equipment and supplies—purchase order date
- Work of employees—when work is completed
- Contracted services—date agreement signed ○
- Rental—when used ○ Travel—when taken

- **Are the expenses associated with an activity identified in the Local Application?** Only expenses related to activities that were approved based on the Comprehensive Needs Assessment and Local Application may be approved for reimbursement.
- **Is it documented?** All Perkins expenditures must be documented at all steps from approval through actual payment. Particular attention is required for salary expenses which require time distribution records or PARs (Personnel Activity Report), particularly when the employee works on multiple cost objectives. Source documentation can include checks, invoices, contracts, payroll entries and may be in electronic form.

### SUPPLEMENT VS. SUPPLANT

The purpose of Perkins funding is to enhance, not replace state funds (Perkins Sec 111). It is presumed that supplanting has occurred when:

- Perkins funds are used to provide services that the recipient is required to make available under another federal, state, or local law; or
- Perkins funds are used to provide services that the recipient provided with non-Perkins funds in the prior year; or
- The recipient provides services for non-CTE students with non-federal funds, and provides the same services to CTE students using Perkins funds.

Exceptions must be evaluated on a case-by-case basis and may be granted when the institutions can demonstrate that the activity would be impossible to continue without federal funds. Exceptions will be rare.

### SELECTED RULES AND GUIDANCE

- **5% Administration Rule**  
Institutions are permitted to reserve up to 5% of its annual allocation for administration of the grant but may only be reimbursed for 5% of grant funds actually spent unless an indirect cost rate has been established. Institutions may choose to fund the administration of the grant out of institutional funds and devote all or some portion of the administrative reserve to programs. If administrative money is used to fund the coordinator's salary, personnel activity reports must be maintained to indicate the amount of time spent on Perkins related activities. (Perkins Sec 135)
- **Carryover of Unspent Funds**  
Institutions are not permitted to carry forward unspent funds from one fiscal year to the next. Unspent funds will be placed in the distribution formula for the following fiscal year.
- **Co-mingling of Funds**  
Funds may not be co-mingled to the extent that they lose their identity. Expenditures must be traceable to the source of funding; however programs can be co-funded to maximize the available funds. If Perkins funds are used collaboratively with other funds, the level of effort provided by Perkins must be recognizable and must support only those activities that would be approved if the activity was solely funded by Perkins.

- **State Administered Program**

Because Perkins is a state administered program, the State may elect to have more stringent requirements on the expenditure of funds than might be allowed by the Act or EDGAR.

#### **REQUIRED WRITTEN POLICIES**

Effective in 2015, EDGAR requires that recipients of any and all federal funds maintain a number of written policies which are outlined and cited below. These policies are not limited to Perkins but apply to all federal grants. These policies must be available during compliance reviews to avoid a finding.

- 1) Cash Management Procedure - § 200302(b)(6) & § 200305
- 2) Allowability Procedures - § 200302(b)(7)
- 3) Conflicts of Interest Policy - § 200318(c)
- 4) Competition - § 200319(c) (one-year transition period provided)
- 5) Equipment Management Procedures - § 200313(d)
- 6) Method of Procurement To Be Followed - § 200320(d)(3)
- 7) Compensation and Fringe Benefits Policies – § 200430(a), § 200431(a), § 200464
- 8) Travel Policy - § 200474(b)
- 9) Time & Effort Policy - § 200430(a) (1)

In addition to those specified in EDGAR, ADHE requires the college to maintain written policies related to the collection and reporting of special populations, technical skills assessments, and apprenticeships. Requirements are available in the Reference section of [www.adheperkins.com](http://www.adheperkins.com).

## PERKINS DEFINITIONS

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Consult Section 3 of the Perkins Act for definitions specific to Perkins V.

### NUMERIC

**1P1.** Core indicator performance level that measures placement of students: retained in college, employment, advanced training, military, National Community Service Act programs, Pace Corp.

**2P1.** Core indicator performance level that measures program credential attainment: academic award, industry-based technical skill credential, apprenticeship, licensure.

**3P1.** Core indicator performance level that measures nontraditional participation: level of students enrolled in programs considered either male or female nontraditional.

**1<sup>st</sup> Quarter Rule.** The recipient may be reimbursed for no more than 25% of its total grant prior to October 1 of the program year. This limitation exists because the State only receives 25% of its annual allocation in the first quarter.

**5% Rule.** Limits use of Admin funds to 5% of the total grant (if indirect cost rate negotiated) or 5% of actual funds spent (without indirect cost rate negotiated).

**10% Rule.** Requires amendment of Annual Plan if expenditures in a single budget category exceed the amount approved by 10%. Funds in excess of the approved amount plus 10% will not be reimbursed.

### A

**Academic year cohort.** The year in which a student becomes or remains as a Concentrator. The cohort is used to determine funding and which students will be measured on performance. This is followed by the tracking year in which, depending upon the core indicator, success “upon program completion” is determined.

**ACTE.** Arkansas Career and Technical Education. Membership association affiliated with national ACTE (Association of Career and Technical Education).

**Activity.** A specific project that is funded as part of the Annual Plan.

**Administration.** Activities necessary for the proper and efficient performance of the eligible agency or eligible recipient’s duties under the Act, including supervision, but not curriculum development, personnel development, or research activities.

**Advanced training.** Is delivered by experts, includes hands-on application and extends beyond mastery of basic skills. Possibilities include: Apprenticeship Specialized trade schools, boot camps, internships, clinicals, work-based learning.

**All aspects of an industry.** Strong experience in and comprehensive understanding of the industry that the individual is preparing to enter.

**Allocable expense.** Considers whether an expense receives relative value and whether it can be attributed to a specific grant.

**Allocation.** Amount of grant actually received by a state.

**Allowable expense.** Considers whether an expense is consistent with federal cost principles, is relevant to the federal program, has been approved in the budget, and is needed by the program.

**Amendment.** Annual plan activities must be amended when the scope of the activity has changed significant or if expenses will result in a single budget category being exceeded by 10%.

**Annual Plan.** The recipient's plan for use of funds in a given single year. Activities in the annual Plan must be approved in the Local Application.

**Appropriation.** Funding approval for expenditures by Congress. Arkansas is generally appropriated around \$13M annually.

**Articulation agreement.** A written commitment to a program designed to provide students with a non-duplicative sequence of courses leading to degrees or certificates in a college program.

**Articulation.** Process for coordinating the linking to two or more educational systems to create a smooth transition from one level to another without loss of course credit.

## B

**Basic grant.** Fund distributed to local recipients based on a formula defined in the Act.

**BIA.** Bureau of Indian Affairs. A federal agency charged with oversight of lands held in trust for Native Americans and providing various services including financial aid for college students.

## C

**CAR Consolidated Annual Report.** Due by December 31, the report provides student enrollment data and core indicator performance results at the state level.

**Carryover of unspent funds.** Perkins does not permit carryover of funds from one program year to the next. Unspent funds are added to the following year's allocations and redistributed as part of the funding formula.

**CIP Code.** Classification of Instructional Program. Classification of programs by code, title, and program description.

**Coherent sequence of courses.** A series of courses in which vocational and academic education are integrated and which directly relate to and lead to both academic and occupational competencies.

**Compliance review.** The process through which state staff confirms that the recipient has used Perkins funds appropriately, that funding supports needs identified in the Comprehensive Needs Assessment, and that fiscal and accountability requirements are met. Compliance reviews are scheduled based on a risk assessment and may be conducted onsite or by webinar.

**Comprehensive Needs Assessment.** An analysis of student performance disaggregated by subgroups, and an assessment of the quality of CTE program delivery. Is the first step in the Perkins V process and is included in stakeholder consultation. Is the basis of the Local Application.

**Concentrator.** A student that has declared intent in a CTE program of study and has earned 12 credit hours or has completed a program that requires less than 12 hours.

**Consortium.** Group of 2 or more institutions of which individual institutions which did not meet the \$50,000 Perkins minimum funding level.

**Contracted Services budget category.** Expenditures for services obtained from consultants or others not employed by the college. Income is reported on a 1099-MSIC and a PAR is not required.

**CTE. Career and Technical Education.** Organized educational activities that offer a sequence of courses that includes both academic and technical knowledge and skills, provides technical skills or a recognized postsecondary credential. It may include prerequisite courses (other than a remedial course) and include competency-based, work-based, or other applied learning and, to the extent practicable, coordinate between secondary and postsecondary education programs through programs of study.

## D

**Data Quality.** Data used for Perkins accountability must be useful. Valid speaks to the accuracy of the data; does it measure what it intends to. Reliable speaks to how consistent the data is over time; is data calculated in the same way over various years. Timely speaks to the appropriate time period; is data relative to the time period being reported. Complete speaks to whether the data is sufficient; is all data submitted.

**Disability, Individual with a.** Having a physical or mental impairment that substantially limits one or more of the major life activities.

## E

**EDGAR.** Education Department General Administrative Regulations. Provides rules and regulations pertaining to all federal grants, including Perkins.

**Economically disadvantaged.** Individuals received government assistance based on financial need. For Perkins reporting, this includes recipients of financial aid based on financial need (such as Pell) but may also include other types of assistance.

**Eligible recipient.** An institution of higher education providing education at the postsecondary level or a consortium of two or more eligible institutions.

**End of year program report.** Report of accomplishments for each activity included in the Annual Plan.

**English learner.** An individual who has limited ability in speaking, reading, writing, or understanding the English language and whose native language is not English, or who lives in a family or community environment in which a language other than English is the dominant language.

**Equipment budget category.** Used only for items that must be tracked to prevent loss. A dollar value is not assigned; tracking is determined by the opportunity for loss. All electronics are considered equipment. When items are codes to Equipment, they are placed on the inventory log generated by the Perkins Portal and the recipient is responsible for inventory control.

## F

**Focus areas.** Programs or services to be supported by Perkins funds which were identified in the Comprehensive Needs Assessment and then prioritized in the Local Application. Only expenses related to the approved focus areas can be approved for reimbursement.

**Foster Care.** Youth are generally considered to have aged out of foster care at age 18. However, they can qualify for Educational Training Voucher (ETV) up until age 26 if they aged out of foster care at 18 or older, entered into a guardianship or adoption at age 16 or older, and have not accessed ETV for more than five years and are students in good standing.

## G

**Gap Analysis.** The process of reviewing student performance data to identify under achievement by race, gender or special population.

## H

**High skill.** A pathway that leads to a baccalaureate degree or leads to an occupation that requires certification or licensure.

**High wage.** Wages which exceed 20 percent above the average wage for all Arkansas occupations. Wages are available at <http://www.discover.arkansas.gov/Industry/State-Employment-and-Wages-by-Industry>. (High wage example: Average weekly wage for all industries is \$900. A weekly wage of \$1,080 will be considered high wage.)

**Homeless individual.** Generally defined by type of nighttime residence: shelters/transitional housing; shared residency; unsheltered; hotels/motels/trailer parks/camping grounds or in places not ordinarily used for regular sleeping accommodations for human beings, or migratory children living in any of these conditions. Perkins references the *McKinney-Vento Homeless Assistance Act* for further definition.

## I

**Improvement plan.** Should recipient fail to meet 90% of a negotiated core indicator target, the recipient will be required to enter into an improvement plan that addresses the deficiencies.

**In-demand occupation.** Developed and approved by the Arkansas Division of Workforce Services and based on the top five growth occupations within the top 25 growth industries. In-demand occupations are determined at both state and regional levels and can be found at <http://www.discover.arkansas.gov/Occupation/Projected-Employment-Opportunities-List>.

**Indirect cost rate.** Any cost not directly identified with a single, final cost objective and therefore not subject to treatment as a direct cost. Indirect costs do not have to be approved or documented in the same manner as direct costs. Colleges negotiate indirect cost rates with the U.S. Department of Health and Human Services. Absent that, an indirect cost rate limited to Perkins grants only, can be negotiated with ADHE.

**Industry Certifications budget category.** Limited to purchase of industry certifications for either student or faculty. Does not include travel or activities that promote industry certifications. Those functions should be coded to the appropriate budget category.

**Integration of academic and technical education.** A coherent sequence of courses from which students acquire the balance of academic and occupational skills that are required for successful job performance.

## J

## K

## L

**LMI. Labor market information. Data and information related to wages, jobs, careers, training, employment, unemployment and other data related to the labor market. Used to determine high wage and in-demand sectors and is a key element of the Perkins needs assessment.**

## M

**Minimum allocation.** Recipients must receive at least \$50,000 in order to receive funds. If the funding formula produces less, the college must join with another college, forming a consortium that receives in excess of the \$50,000 minimum allocation.

**Military, parent in.** Youth with a parent on active military duty. This does not include students who are in the military themselves. Parent must be on active duty, not a reservist.

## N

**NACTEI. National Association of Career and Technical Education Information.** A national organization with an annual conference specifically on Perkins data and accountability.

**Nontraditional student.** Occupations or fields of work for which individuals from one gender comprise less than 25 percent of the individuals employed in each such occupation nationally.

## O

**Obligation, date of.** The date on which a recipient commits to the expenditure. Date of obligation varies by the nature of the expense which is outlined in EDGAR 76.707.

**OCTAE. Office of Career, Technical and Adult Education.** The division within the U. S. Department of Education with oversight of Perkins.

**Other budget category.** Used for expenses that do not fit any other category. Use of Other should be rare and fully explained.

**Out-of-Workforce Individual.** An individual who has worked primarily without remuneration to care for a home and family and who for that reason has diminished marketable skills; or, is a parent whose youngest dependent child will become ineligible to receive assistance under Part A of Title IV of the Social Security Act no later than 2 years after the date on which the parent applies for assistance under this title; and is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment. Previously described as Displaced Homemaker.

**PAR. Personnel activity report.** A record that documents the time and effort devoted to a single cost objective. In general, if an individual receives a portion of salary funded by Perkins, the employee must document the time devoted to Perkins as well as to non-Perkins activities. There are multiple nuances to requirements and these are detailed in EDGAR 200.430 and in U.S. Department of Education guidance dated September 7, 2012.

**Participant.** A student that has declared intent in a CTE program of study and has earned 3 credit hours.

**PCRN. Perkins Collaborative Resource Network.** A website provided by OCTAE with a wide variety of Perkins related information and resources.

**Perkins I File.** Report of students who are members of special populations. College collects data locally and submits into the Arkansas Higher Education Information System.

**Perkins II File.** Report of students who have attempted an industry-based assessment or completion of apprenticeship. College collects data received from certification providers. State level data can also be collected by ADHE Perkins staff and uploaded into this report for disaggregation at the college level.

**Perkins V.** Common name of the *Strengthening Career and Technical Education for the 21<sup>st</sup> Century*. This is the fifth reauthorization of the original authorization in 1984

**Perkins loan.** Low interest loan for graduate and undergraduate students with financial needs; not related to Perkins funds but named for Senator Carl D. Perkins.

**Professional Development.** Use of Perkins V funds for professional development has new conditions. For a full definition, see Section 3 and Section 135 of the Perkins V Act.

**Professional Development budget category.** Includes travel, conferences and training whether offered on campus or offsite. See Section 3 and Section 135 of the Act to determine what qualifies as professional development.

**Program of Study.** A coordinated, non-duplicative sequence of academic and technical content at the secondary and postsecondary level that:

- incorporates challenging State academic standards,
- addresses both academic and technical knowledge and skills, including employability skills
- is aligned with the needs of industries in the economy of the State, region, Tribal community, or local area
- progresses in specificity (beginning with all aspects of an industry or career cluster and leading to more occupation-specific instruction);
- has multiple entry and exit points that incorporate credentialing; and
- culminates in the attainment of a recognized postsecondary credential

## Q

**Quality.** A measurement of the quality of CTE programs. Only programs of sufficient quality may be funded by Perkins.

- Minimum resources for programs of study are established at the time the program is defined in AHECB Policy 5.11. These include classroom instruction, laboratory and work-based instruction, library and equipment needs.
- Programs of study are externally reviewed every 7-10 years based upon a review schedule negotiated between the intuition and ADHE as defined in AHECB Policy 5.12. The process begins with a comprehensive self-study which includes program need/demand, curriculum, faculty, resources, course delivery methods, student outcomes and program improvement activities.
- Accredited/licensed/state certified programs follow the usual review practices and schedule of the accrediting/approval body.
- Faculty meet the minimum credential requirements as defined in AHECB Policy 5.11. A minimum of one full-time faculty member with appropriate credentials is required for each degree program. Faculty teaching general education courses are expected to hold at least a master's degree with eighteen graduate hours in the teaching field. Faculty members teaching in occupational skill areas must hold at least an associate degree or appropriate industry-related licensure/certification.
- Students are provided the opportunity for early college credit (articulation/dual/concurrent) for both academic and technical courses.

## R

**Reasonable and necessary expense.** Considers whether an expense necessary for the performance of the grant, follows sound business practices, and whether a prudent person would consider the expense an appropriate use of funds.

**Recognized Postsecondary Credential.** Perkins V adopts the definition included in WIOA which includes: a college award (CP, TC, AAS), industry-recognized certification, apprenticeship certification, or state/federal recognized license.

**Reserve fund.** Local recipients received no less than 85% of the State allocation. Of that 85%, the State may withhold up to 15% of the 85% and distribute to eligible recipients on a competitive basis. The law defines parameters for use of the funds and the State may further prescribe use of funds.

## S

**Salaries and benefits budget category.** Includes salaries and benefits for college employees that receive a W-2 for those earnings. A PAR is required. See also Contracted Services budget category.

**Scope.** A measurement of the quality of CTE programs. Only programs of sufficient scope may be funded by Perkins.

- Curriculum shows a progression of instruction to occupation specificity. Where possible, students may progress from a Certificate of Proficiency to a Technical Certificate to an Associate Degree which provides multiple entry and exit points.
- Curriculum offers academic, technical and employability skills, either through individual courses or embedded in courses.
- Curriculum is aligned with the needs of industry and is informed by labor market information.
- Curriculum provides opportunities to obtain recognized credentials, industry certifications or degrees.

**Size.** A measurement of the quality of CTE programs. Only programs of sufficient size may be funded by Perkins.

- The receiving institution or consortium offers a minimum of five CTE programs of study.
- Programs of study require the following number of undergraduate semester credit hours as defined in AHECB Policy 5.11. Program hours may vary based upon program accreditation requirements.
  - Certificate of Proficiency 6-21
  - Technical Certificate 21-45
  - Associate of Applied Science 60-72
- Programs must meet viability standards as defined in AHECB Policy 5.12. In general, an average of four graduates per year for technical certificates (TC) and technical associate degree programs (AAS).

**Single parent.** An individual student who is unmarried or legally separated from a spouse and has a minor child or children for which the parent has either custody or joint custody; or is pregnant.

**Special populations.** Students who are categorized as among the following are counted as special populations: a) Individual with disabilities; 2) Economically disadvantaged; 3) Nontraditional students; 4) Single parent; 5) out-of-workforce individuals; 6) English learners; 7) Homeless individuals; 8) Youth who are in or aged out of foster care; 9) youth with a parent on active military duty. See individual entries for each.

**Stakeholder Consultation.** The process of seeking input from a wide variety of groups with a vested interest in the quality of CTE offerings and how well those offerings respond to the unique needs of the stakeholder groups.

**State determined level of performance.** Negotiable levels of performance between the State and local recipients. Recipient must accept state determined targets or negotiate something different based on justified circumstances.

**State leadership funds.** The State is authorized to set aside up to 10% of the State allocation for activities that improve CTE, including nontraditional preparation, special populations, individuals in State institutions, recruitment and preparation of CTE educations, and technical assistance for eligible recipients.

**Supplanting.** The use of Federal funds to pay for services which are legally required or were provided by non-federal funds in the previous program year. Perkins is a supplement-not-supplant grant which prohibits supplanting.

**Supplemental monitoring.** Is provided when the recipient is deemed to be a high risk based on a point system. Risk factors include coordinator tenure, size of the grant, history of findings, unused funds, excessive amendments. Supplemental monitoring is always onsite.

**Supplies budget category.** All tangible items not coded to Equipment are considered supplies and do not have to be tracked. Supplies should not be purchased for individual students and all software is considered supplies.

## T

## U

**Use of funds.** The Perkins Act defines the appropriate use of Perkins funds and categorizes those uses by required and permissive. The required uses must be addressed by the recipient before using funds in other ways.

## V

## W

**WIB. Workforce Investment Board.** Regional entities created to implement the Workforce Innovation and Opportunity Act. Its main role is to direct federal, state and local funding to workforce development programs and to oversee the One-Stop Centers.

**WIOA. Workforce Innovation Opportunity Act.** Federal legislation that authorizes a demand driven and aligned workforce development system designed to provide employment and training services that are responsive to the demands of local and regional area employers.

**Work-based learning.** Work-based learning is defined as sustained interactions with industry or community professionals in real workplace settings or simulated environments that foster in-depth, firsthand engagement with the tasks required in a given career field that are aligned to curriculum and instruction. The learning may be experienced at actual work locations, in a traditional school setting, use of comprehensive simulated work environments, robotics, virtual reality, or gaming. If simulations are used to replace in-business experiences, the simulation must teach occupational skills and replicate job-like conditions.

**Youth.** A *youth* is generally defined as an individual who is between the ages of 16 and 24. An *out of school youth* is defined within WIOA as being in this age range but with one or more of the following additional qualifications for Perkins postsecondary purposes.

- Is not attending school
- Has a secondary school diploma or equivalent who is low income and is basic skills deficient or an English language learner.
- Is subject to the juvenile or adult justice system.
- Homeless as defined by McKinney-Vento.
- Is in or has aged out of foster care.
- Is pregnant or parenting
- Has a disability.
- Is low income and requires additional assistance to enter or complete an educational program or to secure or hold employment.

## Perkins V FAQ

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**Q**      **What is Perkins V?**

**A**      The *Strengthening Career and Technical Education for the 21<sup>st</sup> Century Act* (commonly referred to as Perkins V) is a bipartisan reauthorization of previous Carl D. Perkins federal programs. Funding for Perkins V represents the largest federal investment in career and technical education provided to states.

**Q**      **What is its purpose?**

- A**
- Develop challenging academic and technical skills that prepare students for employment in high skill, high wage or in-demand occupations.
  - Promote integration of rigorous and challenging academic and CTE instruction.
  - Provide services and activities designed to develop, implement and improve CTE.
  - Support partnerships between secondary and postsecondary institutions, local workforce investment boards, business and industry.
  - Develop lifelong learning opportunities to keep America competitive.
  - Increase employment opportunities for populations who are chronically unemployed or underemployed, including individuals with disabilities, individuals from economic disadvantaged families, out-of-workforce individuals, youth who are in or have aged out of foster care, and homeless individuals.

**Q**      **When does Perkins V begin?**

**A**      A Transition Plan will be developed in 2019-20 with full implementation beginning July 1, 2020 through June 30, 2024.

**Q**      **What happens during the transition year?**

- A**
- Recipients will conduct a data-driven Comprehensive Needs Assessment in consultation with a diverse group of stakeholders.
  - A four-year Local Application will be submitted for approval that is based on findings from the Comprehensive Needs Assessment and contains core indicator performance targets for the four-year period.
  - Once the Local Application is approved, an Annual Plan for 2020-21 containing individual activities based on the Local Application will be submitted for approval.
  - No performance targets will be required during the transition year.

**Q**      **What institutions are eligible for funding?**

**A**      Institutions that provide associate or below programs.

**Q**      **What CTE programs are eligible for funding under Perkins?**

**A**      In the federal fiscal year 2019 Consolidated Appropriations ACT passed in February, Congress approved a technical amendment to the Perkins V legislation which added language to the definition of “eligible institution” to make clear that for the purposes of distributing funds for postsecondary education programs, a recognized postsecondary credential does not include a baccalaureate degree. The language reads: “...does not intend for...funds provided under this ACT to support the attainment of baccalaureate degrees, but instead to support CTE programs and programs of study integrated into career pathways aligned with workforce and education systems.” Based on this guidance and other considerations, eligible programs under Perkins V will be Certificate of Proficiency, Technical Certificate and Associate of Applied Science. CIP 24 for general study type programs, regardless of program level, is not eligible.

**Q**      **How much funding can a college receive?**

**A**      Funding is determined by a formula that is based on the number of Perkins Concentrators (CTE students who have completed 12 credit hours) that receive Pell or Bureau of Indian Affairs financial aid. Recipients receive a proportionate share of the state’s total Concentrators.

**Q**  
**A**

**Who are Perkins students?**

Students who have declared a major in a CTE program of study. Perkins Participants have earned at least three credit hours and Concentrators have earned at least twelve credit hours (or completed a program less than twelve hours in length). Perkins students are not transfer students.

**Q**  
**A**

**What can Perkins funds be used for?**

Generally, for any activity that advances the goals of the Perkins program but with stipulations. Activities may not supplant state funding, must be EDGAR complaint and must be planned for in the Local Application. Activities can meet all eligibility requirements and still not be funded if absent from the Local Application. What is eligible at one institution may not be eligible at another due to supplanting and contents of the Local Application.

**Q**  
**A**

**What are postsecondary core indicator requirements?**

Core indicators have been reduced to three. They are:

1. % of Concentrators who, during the second quarter after program completion, are employed; remain enrolled in postsecondary education; are in advanced training, military service or a program of the National and Community Service Act or in the Peace Corp.
2. % of Concentrators who receive a recognized postsecondary credential (industry-recognized credential, apprenticeship certificate, licensure, associate or below academic degree).
3. % of Concentrators who are in programs that lead to nontraditional fields.

**Q**  
**A**

**How are core indicator targets established?**

The state establishes state targets with input from local recipients. Local recipients shall agree to accept those targets or may negotiate something different but changes must be based on same requirements as those required for the state. The local recipient shall include consultation with stakeholders when establishing targets. The recipient must make meaningful progress toward improving performance of all CTE students, including those from special populations.

Targets may be adjusted prior to the third program year but will require comparison to similar states and be higher than the average actual performance of the two most recently completed program years. Unanticipated circumstances may be taken into consideration but the circumstances must be extreme.

**Q**  
**A**

**What happens if performance targets are not met?**

If actual performance of a core indicator falls below 90% of the target, the recipient must enter into an Improvement Plan and prioritize use of funds to address the deficiency. The Improvement Plan must include an analysis of the performance disparities or gaps in special populations. Sanctions are permitted by legislation but will only be applied if the recipient fails to implement a meaningful Improvement Plan. Adjustments to performance targets cannot be made while in Improvement Plan status.

**Q**  
**A**

**Who are special populations?**

Continued Categories

- Individuals with disabilities
- Individuals from economically disadvantaged families
- Individuals preparing for nontraditional fields
- Single parents, including single pregnant women
- English learners

New Categories

- Out-of-workforce individuals (replaces displaced homemaker)
- Homeless individuals
- Youth who are in or have aged out of foster care
- Youth with parents on active duty in armed forces

**Q** **How are special populations reported?**

**A** The institution may use already available information such as financial aid for economically disadvantaged but most categories will be collected manually with students self-reporting. Data may be collected through student management systems but if automatic systems are not available, a manual survey must be conducted in both Fall and Spring semesters.

Special population information is reported into AHEIS in the Perkins I-Special Populations File and is a requirement of the grant. Failure to do so will result in Improvement Plan status. Audits for validity and reliability will be included in compliance reviews.

**Q** **Who is a nontraditional student in Perkins?**

**A** Nontraditional for Perkins refers to students who are enrolled in programs leading to employment in a field where 25% of the national workforce is of a single gender (women in welding; men in nursing).

**Q** **What is the process for receiving funding?**

**A** A Comprehensive Needs is conducted, followed by input from stakeholders. Findings become the basis for a four-year Local Application which is the master document for an Annual Plan that describes specific activities to be funded.



**Q** **What is required in the Comprehensive Needs Assessment?**

- A**
- Description of how CTE programs offered by the recipient
  - Analysis of student performance on core indicators including those of special population groups
  - Size, scope and quality of programs that meet needs of all students
  - How programs are aligned with labor market needs
  - Progress on implementation of secondary to postsecondary programs of study as defined by Perkins
  - How educator recruitment and retention will be improved, including transition from industry to teaching and recruitment from underrepresented groups
  - How special populations will be assisted to meet performance targets
  - How work-based learning opportunities will be identified

**Q** **What is required in the Local Application?**

- A**
- Results of the Comprehensive Needs Assessment and how the assessment will inform funding choices
  - Which programs of study will be supported with Perkins funding
  - Description of career guidance/counseling services and how those are provided through an organized system
  - Description of activities for special populations and how they will be prepared for high skill, high wage or in-demand occupations
  - How workplace learning opportunities will be provided
  - Opportunities for high school students to earn postsecondary credit
  - Collaboration opportunities with secondary on recruitment and training of teachers and staff particularly those from underrepresented groups
  - How Required Uses of Funds will be satisfied
  - Performance targets for four-year period

**Q What stakeholders must be consulted in development of the Local Application?**

**A** There are subgroups in the categories below and all subgroups must be included.

- CTE faculty and staff (both secondary and postsecondary)
- Local/regional/state workforce investment boards
- Business and industry
- Parents and students
- Representatives of special populations
- Representatives from regional or local agencies serving out-of-school youth, homeless children and youth as defined by ESEA

**Q What happens if the college wants to spend funds on activities not included in the Local Application?**

**A** Funding is restricted to needs specified in the Local Application. Given this, recipients must anticipate needs as defined by the needs assessment.

**Q Can the Local Application be updated as community conditions change?**

**A** Recipients must update the Local Application between years 2 and 3 of the four-year Local Application period and may update it annually if needed. Updating requires the same process as originally used: needs assessment and stakeholder consultation.

**Q Have requirements for use of reserve funds changed?**

**A** Yes. The amount that the state may withhold from the basic grants awarded by formula has increased from 10% to 15%. Additionally, use of reserve funds are restricted to: Colleges in rural with a high number of or a high percentage of CTE students, and areas with disparities or gaps in performance...in order to...foster innovation or promote implementation of programs of study. Gaps in performance and programs of study restrictions are new. It is expected that all colleges will meet the requirements of at least one of the funding criteria.

**Q What are the new requirements for funding professional development**

**A** Eligible uses for professional development have changed. Funds must be:

- Used to for activities that are integral to academic achievement.
- Sustained (not stand-alone, one-day or short-term workshops), intensive, collaborative, job-embedded, data-driven, and classroom focused.

The law contains an extensive list of “may include” activities that were present in Perkins IV. The difference in Perkins V is the restrictions shown above.

**Q Will the split between secondary and postsecondary change?**

**A** No. The split will continue with 75% to high schools; 25% to colleges.

**Q Who do I contact for more information?**

**A** Brinda Berry, ADHE Federal Program Manager, 501.371.2098, [brinda.berry@adhe.edu](mailto:brinda.berry@adhe.edu)  
Monieca West, ADHE Federal Program Manager, 501.371.2018, [monieca.west@adhe.edu](mailto:monieca.west@adhe.edu)