

TUTORIAL TEXT-SECTION 135-LOCAL USES OF FUNDS

INTRO

This is Part 2 of the Local Applications Tutorial. In this video, we will focus on Section 135-Local Uses of Funds. In separate videos, we will review Section 134-Local Application and Section 113-Accountability.

KEY POINTS

Even though Section 135 follows Section 134 in the Law, the college should review Section 135 first as these areas must be addressed before funds can be awarded for any purpose. It is not necessary to spend Perkins funds in these areas. The college must just document that it is providing these services. If the college finds that it is not, then it must either use Perkins funds or commit to using institutional funds to meet the requirement.

The Perkins IV legislation included Required Uses of Funds but also had a section that specified Permissive Uses of Funds. In Perkins V, the format is a bit different. Section 135 is now called Local Uses of Funds and lists five required uses of which the fifth is “Increasing Student Achievement.” This item details a list of twenty activities that contribute to student achievement and are described as “which may include.” These twenty “may include” items replaced the Permissive Uses of Funds found in Perkins IV.

PORTAL

Once you have logged in to the Portal and navigated to the Local Application on the Dashboard, you will find Section 135 about midway down on the navigation panel to the left.

Career Exploration and Development Section

1. The primary difference in what is required in Sections 134 and 135 is: Section 134 focuses more on how the college involves the local workforce board in providing career services. Section 135 focuses more on how services are provided in an "organized and systematic framework." Section 135 references the use of labor market information which has connections to the local workforce board as well as a list of other activities that contribute to a comprehensive system.
2. The goal should be an organized and comprehensive system. If the system does not meet this definition, it should be considered for a focus area.

Professional Development Section

1. The Section 134-Local Application section on Coordination with Higher Education in Faculty Development has a small reference to use of professional development in recruiting faculty from under-represented groups.
2. The Local Uses of Funds is more broadly focused and requires comment on how the college provides professional development for faculty as well as a wide range of other staff.
3. The section contains nine examples of what might be included in professional development. Those include:
 - a. Instructional approaches, including integration of academic and CTE standards
 - b. Use of labor market information
 - c. Advancing knowledge, skills and understanding of all aspects of industry
 - d. Managing CTE programs
 - e. Developing strategies to increase student achievement and close gaps in performance
 - f. Understanding pedagogical practices
 - g. Understanding accommodations for individuals with disabilities
 - h. Developing frameworks to effectively teach students
 - i. Effective use of community spaces that provide access to tools, technology, maker spaces or libraries
4. A key consideration for professional development is how it impacts student learning and how it is used to achieve performance measure targets.

High-Skill, High-Wage, In-Demand Prep Section

1. The Section 134-Local Application section on Special Populations, the college is required to describe efforts to prepare special populations for high-skill, high-wage, in-demand occupations.
2. The Local Uses of Funds section requires the college to provide evidence of how it is preparing all students with the skills necessary to be successful in these type industries and occupations.
3. In order to do this, the college must have defined what constitutes these industries and occupations locally. This is typically done in conjunction with local WIB boards and the Arkansas Department of Commerce.
4. Substantial information to assist the college can be found at www.discoverarkansas.net.

Integration of Academics into CTE Section

1. The Section 134-Local Application section on Strengthen Academic and Technical Skills primarily references requirements for high schools as they coordinate between Perkins and ESSA.
2. This section in Local Uses of Funds specifically requires comment on how the college assures that CTE students are prepared academically in addition to technical skills.

Increase Student Achievement Section

1. The Section 134-Local Application section on Process for Addressing Disparities and Gaps asks the college to define the process it will use to meet performance targets and reduce disparities and gaps between all students and those from subgroups.
2. This section in Local Uses of Funds asks the college to define how it plans and carries out programs and activities that result in increased student achievement among CTE students as measured by the three Perkins core indicators.
3. This is the section of the law that references “activities which may include.” This list of twenty approaches should be reviewed and considered when developing strategies for increasing student achievement.

Evaluation of Programs Section

1. All activities that are funded by Perkins must be evaluated for effectiveness. This includes the “measurable outcome” that is required for each activity in the Annual Plan as well as evaluation progress toward meeting core indicator performance measures.
2. This section asks the college to describe how this obligation will be met. This could include how Perkins results are integrated into overall performance objectives of the college and/or how Perkins performance results are shared with faculty and staff not directly involved in day-to-day oversight of Perkins.
3. The primary concern is that Perkins funds be evaluated for effectiveness to determine whether a strategy should be changed or if continued funding is warranted.

Pooling of Funds Section

1. Pooling of funds is permitted between secondary and postsecondary or between two institutions of higher education.
2. Pooling of funds would require that the funded activity appear in the Comprehensive Needs Assessment and Local Application of both colleges and/or high school.
3. The college is not required to pool funds but it is an eligible use of local funds.

Administrative Funds Section

1. The college has total flexibility with regard to the amount of the grant charged to admin as long as it is not more than 5% of the grant.
2. If the college has an established “indirect cost rate” with either the US Department of Health and Human Services or with The Arkansas Division of Higher Education, the letter should be uploaded. This allows the college to utilize the full 5% without having to provide documentation on what it was used for.
3. If the college does not have an established rate, the college must describe in the Annual Plan what admin funds will be used for and provide documentation when asking for reimbursement. In this scenario, the college can only be reimbursed for 5% of what was actually spent.

TIPS AND REMINDERS FOR LOCAL APPLICATION DEVELOPMENT
SECTION 134-LOCAL APPLICATION

Section 134 Instructions:

Reminds you that the Local Application is only written after the Needs Assessment and Stakeholder Consultation have been completed. It begins with an in-depth summary of findings during the needs assessment phase. This is followed by eight areas where you will describe how the college is currently performing, and if there were gaps found, how the college will use Perkins funds to reduce the deficiencies.

These elements are taken directly from the Perkins Law. For more detailed explanation of what is required in each area, a citation for the source in the Law is provided.

Comprehensive Needs Assessment Summary Section

The first part of the Needs Assessment was an in-depth review of student performance data, broken down by all students, race, gender and special populations. In the Needs Assessment Summary field, you will need to thoroughly describe the findings with particular emphasis on subgroups. Perkins V is about reducing gaps and disparities in performance, so the first step is to understand where those gaps occur at your college. If dramatic disparities are found, Perkins funds must be used to address them. You are cautioned to avoid funding activities that “address all students but with special emphasis on special populations” as has been done in the past. Again, if the disparities are great, effort must be made to target the underperforming subgroup.

Student Performance Analysis Findings

1. Review of data analysis, be specific about subgroup performance as this should inform focus areas and Annual Plan activities. Analysis should have identified gaps and stakeholder consultation should have helped identify root causes.

For each of the following, provide individual comments regarding analysis findings. If you are satisfied with analysis, enter what is currently being done. If not, include improvement observations.

Quality of CTE Programs

2. Program of Study Implementation
3. Faculty and Staff Development
4. Equal Access to Quality CTE

Other Needs Assessment Findings

1. Enter findings of interest not included above.
2. If none, enter "No additional findings" so that Portal will allow LA to be saved.

How Were Needs Prioritized

Describe the process and reasoning used to prioritize focus areas.

Focus Areas

1. Focus Areas may be specific programs (Welding), groups (adjunct faculty), functions (advising).
2. Every Focus Area must directly connect to findings of the Needs Assessment.

3. Focus Areas are broadly described. Specifics will be contained in the Annual Plan.
4. Multiple Focus Areas are permitted but should be taken to not have too many. Remember that the purpose of prioritizing areas is so that funds can be directed to areas that will most improve student performance.

CTE Offerings Section

Required Program of Study

1. Describe one program of study that has been aligned between secondary and postsecondary. This should be developed in conjunction with secondary.
2. Secondary should take the lead in this but colleges should not depend on them to do so. If they have not reached out to you, you will need to be proactive. You only need one to be compliant.
3. Review the Program of Study definition in Section 3 of the Law. A PoS is more than a Secondary Career Center program connected to a college or one where concurrent credit is offered.
4. When the PoS is aligned, complete the sample template and upload. If secondary initiates the PoS and uses a different template, use it. If the college initiates the PoS, the high school should use your template so that federal monitoring will have no issues with different forms for a single PoS.

How Needs Assessment Informed the Local Application

1. Describe how the focus areas described in the Local Application align with findings in the Needs Assessment. This will be a primary focus for audits and monitoring at both state and local levels.
2. Describe how the focus areas were determined and what information from the needs assessment influenced those decisions...how the Needs Assessment directed funding choices.

New Programs of Study

1. If the needs assessment/stakeholder consultation supports a new program, it is permissible to fund it at whatever level is deemed appropriate by the college.
2. Be aware that Perkins funds cannot be used to pay for any part of a new/existing program that is required by state or federal law.
3. Examples: If ADHE requires specific equipment, if state law requires provisions for disabled students, or if an accrediting body requires specific faculty credentials/certifications in order to teach the program, Perkins cannot be used to provide these. That would be considered supplanting and illegal.
4. Perkins funds may not be used as match for acquiring additional grant funds for program start-up.

How All Students Learn about CTE Course Offerings

1. Describe how CTE programs are marketed to students and what efforts are made to assist students in connecting courses to their chosen degree plan.

How Special Population Students Learn about CTE Course Offerings

1. Describe specific actions taken to target market to special populations. Example: What strategies are in place to recruit females into STEM or skilled trades?
2. If data indicates a gap in female enrollment in STEM or skilled trades, this could be a focus area that would warrant expenditures in the Annual Plan.

WIB Collaboration Section

Career Exploration

1. Perkins was designed to work in conjunction with WIOA.
2. Describe how the college uses information gained through collaboration with local workforce entities to develop comprehensive career services.

High Skill, High Wage, In-Demand Career Information

1. Describe how the college collaborates with local workforce entities to determine which industries/occupations qualify as high skill, wage or in-demand.
2. How will this information then incorporated into activities that benefit students?

Organized System of Career and Academic Guidance

1. Describe how students received career and academic counseling, before enrolling in programs as well as while in the program.
2. The goal should be an organized and comprehensive system. If the system does not meet this definition, it should be considered for a focus area.
3. Note that this information may also be used in Section 135-Required Uses of Funds. (Click on the "See also" reference above to see this related section.)

Strengthen Academic and Technical Skills Section

Integration of Academic and Technical Instruction

1. This section is primarily for secondary but colleges must provide an answer as the Law does not provide an exclusion for postsecondary.
2. Note the "See also" reference for information more relevant to colleges. This section speaks to how college CTE students achieve academic skills in addition to technical skills. You could develop the answer for that section and use it in this field.

Special Populations Section

Preparing ALL Students

1. Describe the college's general efforts at preparing students for occupations that pay enough to support a family.
2. Note that this is ALL students and therefore general strategies are to be described.
3. Note the "See also" reference which requests the same information as this field.

Preparing SPECIAL POPULATIONS Students

1. After completing the information for the field above, describe what strategies are in place specifically for special populations.
2. If data shows that special populations are under-achieving in specific programs, what is being done to provide additional support to reduce performance gaps?
3. Review input from stakeholders from the various special population categories to determine gaps, root causes, and strategies.
4. Note the "See also" reference. Information in this field can be used there.

Nontraditional Preparation

1. Generally, 25% in 3P1-Nontraditional Participation is equivalent to 100% in other indicators.
2. If there are nontraditional CIPs with nontraditional participation below 10%, what can the college do to increase enrollment and completion?

3. Focus on largest CTE programs.

Special Populations Equal Access to CTE

1. How are special populations assured equitable access and treatment as any student?
2. Examples: Is protective gear available in sizes suitable to smaller stature females in firefighter programs? Is the environment sufficiently respectful to males enrolled in early childhood classes? Are provisions made to support students without normal levels of resources? Are there concerted efforts to understand and reduce the unique barriers faced by special populations as they pursue education?
3. Equal access is broader than enrollment criteria is the same for all students. For purposes of Perkins V, it is about how the college provides support sufficient to allow all students the same level of opportunity for success

No Discrimination Against Special Populations

1. Discrimination is the unjust or prejudicial treatment of one particular person or group of people. Usually the different treatment is because of the person's sex, religion, nationality, ethnicity (culture), race, or other personal traits.
2. Discrimination prevents people from doing things that other people can do freely.
3. What policies are in place to prevent discrimination against students who are members of the Perkins defined special populations?

Work-Based Learning Section

WBL Opportunities

1. Discuss existing opportunities embedded in CTE coursework that expose CTE students to real-world working environments.
2. If opportunity is limited, describe how the college will increase these opportunities.

Early College Credit Section

Providing Opportunities for Early College Credit

1. Describe college efforts to promote early college credit with its primary pipeline high schools.
2. Describe the process and any incentives or specialized efforts to promote early college credit.
3. Focus on early college credit that applies to CP, TC and AAS programs (not AA, or AS).

Coordination with Higher Education in Faculty Development Section

All Groups

1. Describe partnerships or collaboration the college may have in place with other year colleges or four-year universities that result in faculty and staff development.
2. Describe any activities that the college may provide to high schools as they seek to improve faculty and staff development.
3. "See also" reference provides substantial information regarding professional development for faculty and staff.

Under-Represented Groups

1. Using information from the field above, describe existing efforts to recruit faculty and staff from under-representative groups, particularly under-represented groups found in the general student population.
2. If there are under-represented groups, describe how is the college will seek to reduce under-representation.

Process for Addressing Disparities and Gaps Section

How Local Performance Levels Will Be Achieved

1. Based on gaps and disparities in performance identified through the student performance section of the Needs Assessment, describe how the college intends to meet its local performance targets and achieve meaningful progress in results over the four years covered by the Local Application.
2. Do not describe strategies here. This is to describe the process that the college will use to review results and the process the college will use to reprioritize Perkins spending if needed.
3. This could include reviewing certain elements of Needs Assessment and/or seeking additional stakeholder input.

How Disparities and Gaps Will Be Addressed

1. Perkins recipients are required to identify and quantify any gaps or disparities in core indicator performance results. See Section 113(b)(3)(C)(ii)(II) for full description of requirements.
2. This includes a quantifiable description of the progress each subgroup or special population students has made in achieving performance targets.
3. Describe the process that will be used to review disaggregated data and use it to reduce gaps and disparities experience by race, gender or special populations.
4. The process should address how gaps will be reviewed in each of the plan years. Example: How will progress be assessed after Year 1 (AY21)? If little or limited meaningful progress made during Year 2 (AY22), how will the college determine corrective action? If there is still no meaningful progress after Year 3, what corrective action will be taken?
5. Describe how the college will define "meaningful progress."
6. Do not describe strategies here. This is to describe the process that the college will use to review results and the process the college will use to reprioritize Perkins spending if needed.
7. Reducing disparities and gaps is the biggest change in direction for Perkins V. Spending decisions should always be made in this context and the Annual Plan should reflect how funded activities will reduce disparity.

Actions to Be Taken Absent Meaningful Progress by Third Year

1. The process described above requires the college to define the process it will use to assess progress each year.
2. The Law requires that the college describe the actin it will take prior to the third year (AY23) if there has been no meaningful progress toward reducing gaps and disparities in special population performance results.
3. This description should include the process as well as any specific actions that will be taken.