### **Career and Technical Education**

# PERKINS V OPERATIONAL HANDBOOK



A reference guide for administering the Strengthening Career and Technical Education for the 21st Century Act (Perkins V)

### ADMINISTRATION OF THE PERKINS V FEDERAL GRANT

The Alabama State Department of Education (ALSDE) is the sole state agency authorized to receive and disburse federal funds and to supervise the administration of Alabama's Career and Technical Education (CTE) programs. The Strengthening CTE for the 21st Century Act (Public Law 115-224 known as Perkins V). The ALSDE negotiates the level of responsibility for the administration, operation, and supervision of this Act at the secondary level with Alabama's Community College Systems to ensure Alabama's students have a continuum of educational opportunities after graduation.

As the sole state agency, ALSDE administers the Perkins V basic federal grant through the local allocation of the Perkins V grant in accordance with the federally approved state plan. Staff from ALSDE are responsible for the distribution and management of the federal grant to recipients. Grantees for these federal funds are from Alabama's Local Education Agencies and community colleges.

### Sources:

(**Perkins V**) Strengthening Career and Technical Education for the 21st Century Act — *full text is available*.

**Alabama State Plan**—when completed and approved, full text of the Alabama State Plan will be available.

### PRIMARY ADMINISTRATIVE CONTACTS

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### **ACKNOWLEDGEMENTS**

Thank you to the CTE staff from the Alabama State Department of Education, ALSDE, and the other partners who contributed, commented, and reviewed this operational handbook.

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The contents of this publication were made possible through the *Strengthening Career and Technical Education for the 21st Century Act* federal grant from the United States Department of Education administered through Alabama State Department of Education.

### PURPOSE OF THE HANDBOOK

This handbook is a resource for secondary eligible recipients who will be submitting applications for funding under the *Strengthening Career and Technical Education for the 21st Century Act* (Perkins V).

The purpose of this handbook is to provide an understanding of federal and state requirements and guidance developed for CTE programs benefiting from Perkins funding. This handbook highlights specific sections of the Perkins V Act that are critical for understanding the requirements of the Act for implementation in Alabama.

### **New Focus**

To reflect the changes in Perkins V and make this handbook easier to use, it has been extensively rewritten and organized.

- New Program Proposals April 1
- Data Analysis Training—Jobs EQ®
- New vision, mission, goals, and strategic directions for CTE in Alabama
- Guidance on State-recognized Programs of Study
- Information on Comprehensive Local Needs Assessment
- CLNA due July 15
- eGAP due date October 1
- Proposed Core Accountability Indicators
- Algorithm for making local funding decisions
- Descriptions of size, scope, and quality

### **New Tools**

A few acronyms! To help you keep up we have posted a list to the pdf where they can more easily be kept current. This also reduces the number of pages to be printed, resulting in substantial cost savings.

### THE STRENGTHENING CAREER AND TECHNICAL EDUCATION FOR THE 21ST CENTURY ACT (PERKINS V)

The Strengthening Career and Technical Education for the 21st Century Act (Perkins V) amends the Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV). The new act was signed into law July 31, 2018 and went into effect July 1, 2019. For the sake of brevity, throughout this handbook the Strengthening Career and Technical Education for the 21st Century Act will be referred to as Perkins V.

Some provisions of Perkins V will go into effect for the 2019- 2020 school year, which will serve as a transition year for the new law. Full implementation will begin the following year for the 2020-2021 school year.

The reauthorization process was driven largely by a desire to ensure that students are prepared for 21st-century careers. This framing led to a workforce development focus throughout Perkins V with an emphasis on encouraging and incentivizing innovation within career and technical education.

### **Purpose of the Act**

The purpose of the Perkins V Act is to develop more fully the academic knowledge, technical skills, and employability of secondary and postsecondary education students who elect to enroll in CTE programs and programs of study, by:

- 1. Building on the efforts of States and localities to develop challenging academic and technical standards and to assist students in meeting such standards, including preparation for high-skill, high-wage, or in-demand occupations in current or emerging professions.
- 2. Promoting the development of services and activities that integrate rigorous. challenging academic and career and technical instruction that link to secondary and postsecondary education for participating CTE students.
- 3. Increasing State and local flexibility in providing services and activities designed to develop, implement, and improve career and technical education.
- 4. Conducting and disseminating national research and disseminating information on best practices that improve career and technical education programs of study and services, and activities.
- 5. Providing technical assistance that (A) promotes leadership, initial preparation, and professional development at the State and local levels; and (B) improves the quality of Career and Technical Education teacher, faculty, and administrators, and counselors.
- 6. Supporting partnerships among secondary schools, postsecondary institutions, baccalaureate degree granting institutions, area CTE schools, local workforce investment boards, business and industry and intermediaries.
- 7. Providing individuals with opportunities throughout their lifetimes to develop, in conjunction with other education and training programs, the knowledge and skills needed to keep the United States competitive.
- 8. Increasing the employment opportunities for populations who are chronically unemployed or underemployed, including individuals with disabilities, individuals from economically disadvantaged families, out-of-workforce individuals, youth who are in, or have aged out of, the foster care system, and homeless individuals. (New in Perkins V.)

For more information about the purpose of the Act, see The Strengthening CTE for the 21st Century Act, Section 2.

# Title I—Career and Technical Education Assistance to the States (the Basic Grant)

The Perkins V Act provides financial

support for innovation and program improvement in CTE at both secondary and postsecondary levels.

Title I of the Act outlines the structure and requirements related to the Basic Grant under Perkins V. The Act specifies the formula to be used for the allotment and distribution of funds to states, as well as requirements for how states distribute

Perkins V funds to local eligible agencies. In addition, the Act specifies uses of funds by

both state and local recipients.
Perkins V legislation includes several requirements related to reporting and accountability, with many of the state-level requirements having parallel provisions for local recipients. These requirements include submission of applications and performance reports at both the state and local level. There is a requirement that both state and local recipients submit improvement plans if the agreed-upon, state-determined performance measures are not met.

### Title II—General Provisions

Title II of the Perkins V Act refers to federal and state administrative provisions. Section 211 (Fiscal Requirements) states that federal Perkins funds must be used to "supplement not supplant;" funds cannot replace state and local dollars that are being used for CTE activities.

Title II also includes a maintenance of effort provision requiring that state funding for CTE remain at least at the same level as the previous year.

### Title III—Amendments to Other Laws

Title III of the Perkins V Act includes Section 301 (Amendments to the Wagner-Peyser Act), Section 302 (Amendments to the Elementary and Secondary Education Act of 1965), and Section 303 (Amendments to the Workforce Innovation and Opportunity Act).

### PROGRAM PLANNING AND OPERATION

### **Perkins V Program Overview**

Governor Kay Ivey established the Governor's Office of Education and Workforce Transformation (GOEWT) to ensure that the attainment and labor force participation goals are met through an equity-based framework. The GOEWT will work to braid Alabama's federal CTE and WIOA funding streams through the combined 2020 state WIOA plan to develop career pathways based on work-based learning and credential attainment. Alabama's four-year Perkins V State Plan incorporates this guidance and provides direction for use of funds in secondary education programs.

### Alabama's New Vision for CTE

Educators strive to prepare students to meet the

demands of the postsecondary pathway of their choosing.

CTE does more than simply prepare students for careers; it provides Alabama's students with an opportunity of a seamless education-to-workforce continuum equipping them with 21st Century technical skills necessary for success in career and in life.

### Goals

- Provide work-based learning during the following continuum:
  - Career awareness in elementary grades: learning about work
  - Career exploration in middle grades: learning about work
  - Career preparation in high school: learning through work

- Career training in high school and beyond: learning for work
- Matriculate into a rigorous college or career pathway
- Recruit and retain highly qualified career/ technical teachers and administrators
- Provide relevant and focused professional development
- Develop and utilize rigorous, progressive, and evidence-based, career/technical education curricula
- Increase academic skills for career/technical students
- Ensure programs continuously improve through quality monitoring
- Expand Equity and Access to Special Populations
- Close Technical and Academic Gaps

### **ALABAMA PERKINS MODEL**

# State Governance Responsibilities of Perkins State Leadership

Ten percent of the federal Perkins grant funds received by the state is used to conduct state leadership activities to improve CTE. Section 124 of Perkins V specifies how states will undertake these responsibilities. States are required to provide support for:

- Assisting LEAs with two competitive expansion grants per region for LEAs to close inequities among special populations
- Providing formula innovation grants to assist all LEAs financially with career ready indicator exams
- Preparation for non-traditional fields in current and emerging professions, programs for special populations, and other activities that expose students, including special populations, to high-skill, high-wage, or in-demand occupations
- Individuals in state correctional institutions, juvenile justice facilities, and educational institutions that serve individuals with disabilities
- Recruiting, preparing, or retaining CTE teachers, faculty, specialized instructional support personnel, or paraprofessionals
- Technical assistance for eligible recipients States are also required to report on the effectiveness of use of funds to achieve:

- The state's strategic vision and goals for preparing an educated and skilled workforce (including special populations) and for meeting the skilled workforce needs of employers
- State-determined levels of performance
- Reductions in disparities or performance gaps

In addition to these responsibilities, ALSDE promotes development of high-quality programs of study and provides professional development and technical assistance to LEAs as required on a wide range of Perkins-related topics. State staff ensure fund-use effectiveness through a monitoring process described in the Perkins V plan.

Professional development for and by Alabama CTE professionals is comprehensive, sustained, and multifaceted. It includes resources designed to support administration of the Perkins V grant and improve secondary educators' and workforce professionals' effectiveness in increasing student success.

Professional development is delivered through relevant and timely methods and media, including, but not limited to, webinars, conferences, multimedia sessions, trainings, written

materials, workshops, and courses. State staff will produce an annual webinar series for directors to address questions about Perkins fiscal and accountability practices and to orient new CTE directors.

The two prominent professional development events offered by CTE staff each year are the annual New Administrators' Academy and the Series of Directors' Meetings:

- The New Administrators' Academy is a 2.5 days meeting that addresses information new directors need in order to manage the Perkins grant.
- The Directors' meeting series is meetings for all secondary directors.
   Topics address all aspects of CTE, including managing the Perkins Grant.

### **Statewide Communication and Engagement**

ALSDE is fully committed to working

with educators and administrators to increase awareness and understanding of CTE through public relations, marketing, and professional communications to stakeholders.

ALSDE serves as strategic partners with other secondary and postsecondary educators, as well as with business and industry leaders, to strengthen our commitment to student success from high school to college and beyond. Partnerships include regional and state activities that promote development of career pathways, strengthen teacher preparation programs, explore experiential learning and employer engagement opportunities, and support success for students.

ALSDE recognizes informal communication as a critical method to stay engaged and connected with CTE directors and the CTE community. CTE Directors and state staff are highly encouraged to read information via:

- Alabama State CTE Web Site
- Weekly Director Updates
- Emails

In addition, ALSDE regularly requests feedback and evaluation from CTE directors for continuous improvement efforts. The preferred method for collecting feedback is through online surveys, but in some cases paper evaluations may also be used. In some situations, it may be necessary or more effective to collect face-to-face feedback.

Examples of feedback collected from CTE Directors include feedback on:

- Events (e.g. workshops, conferences, webinars, monitoring visits)
- Technical assistance
- Professional development offerings and activities
- The Perkins local program application process
- Business processes and procedures

Feedback collected is used to make improvements to better serve CTE Directors and the CTE community.

# Roles and Responsibilities of CTE Directors in Managing the Perkins Grant

The roles and responsibilities of CTE Directors in managing the Perkins V Grant are to:

- Collaboratively facilitate development of the annual local secondary Perkins application and budget—including budget amendments in eGAP. Submit the grant through eGAP. (October 1)
- Facilitate completion of a Comprehensive Local Needs Assessment (CLNA) (July 15) prior to submission of the LEA eGAP application for Perkins V funding. The CLNA can be limited to the LEA or can be regional in scope.
- Manage activities and budget to meet the goals of the LEA and requirements of the Perkins Law.
- 4. Declare programs in the student management system annually. (May 1)
- Provide, or arrange with state CTE leadership to provide, technical assistance and professional development to assist CTE teachers with achieving LEA goals and meeting statedetermined performance measures.
- Coordinate development and implementation of state-recognized Programs of Study among high schools and ACCS.
  - a. Articulation Agreements
  - b. Dual Enrollment Procedures
- Participate in the CTE Summer Conference and New Directors' Meeting (if applicable) and/or Directors' Meetings
- Enter CRI documentation into the student management system. (Certificates, etc.)
- Attend Data Analysis Meetings Annually (May)

### Respective Role of the "State Eligible Agency"

The Alabama State Board of Education is the "state eligible agency" under the Perkins grant. The Alabama State Board of Education receives the direct grant from USDE. The Alabama State Board of Education also establishes and approves policies and procedures for local and statewide articulation agreements. The state of Alabama has two agencies responsible for the administration and supervision of career and technical education, the Alabama State Department of Education (ALSDE) and the Alabama Community College System. ALSDE operates under the direction of the ALABAMA STATE BOARD OF EDUCATION and is authorized by the ALABAMA STATE BOARD OF EDUCATION to serve as the fiscal agent for the Perkins grant. ALSDE is also responsible for administering Perkins career and technical education enhancement related activities at the secondary level. ACCS's responsibilities

are described in a Memorandum of Agreement (MOA) between ALSDE and ACCS. According to the MOA, ACCS's responsibilities include, but are not limited to, administering CTE programs in postsecondary schools, including technical assistance, oversight for monitoring and compliance, and reporting all data required under the Act.

After the administration and leadership set-asides are taken out, the remaining 85 percent of the Perkins grant award received by ALABAMA STATE BOARD OF EDUCATION (the "pass through funds") is allocated between ALSDE and ACCS. See the Use of Funds at the State Level section for more information on the set-asides. Seventy percent of the pass-through funds are allocated to ALSDE and thirty percent is allocated to ACCS Although each agency has its own responsibilities and allocations. ALSDE and ACCS work collaboratively to ensure that academic skills, technical skills, and workplace readiness skills meet the needs of all of Alabama's students and industries. Additionally, ALSDE works with other Alabama state entities to ensure successful implementation of the Perkins grant.

### **Structure of CTE Programs at the Local Level**

Each local recipient of Perkins funds has someone responsible for serving as the CTE contact to receive communications and correspondences from ALSDE. ALSDE maintains a record of these individuals in the Electronic Grant Application Process (eGAP) system. All eligible recipients must maintain in the eGAP system the contact information of the individual responsible for receiving ALSDE's communications. Should the CTE contact change at any point, the recipient must immediately notify ALSDE and update the eGAP directory information to ensure that the recipient continues to receive important information on the Perkins grant from ALSDE. Generally, Local Education Agencies (LEAs) have a certified Career and Technical Education (CTE) Administrator, who is responsible for overseeing the Perkins grant and, in addition to the Superintendent and CSFO of the LEA, signs the Local Program Application (LPA) and eGAP budget. Alabama Administrative Code requires that CTE Administrators attend the "New Administrator's Academy" administered by the Office of CTE/Workforce Development. All CTE Administrators must complete the New Administrator's Academy within their first 18

months of appointment. This certification counts towards recertification of a staff member's administrative certification and demonstrates that the CTE Administrator has received the necessary administrative training.

In addition to LEAs, who receive funds directly or through consortia agreements, the Department of Youth Services and the Alabama Institute for the Deaf and Blind receive Perkins funds for the improvement of career and technical education provided to secondary students at those institutions.

### **Definitions**

Administration: The term 'administration,' when used with respect to an eligible agency or recipient, means activities necessary for the proper and efficient performance of the eligible agency or eligible recipient's duties under this Act, including the supervision of such activities. The term does not include curriculum development activities, personnel development, or research activities.

All Aspects of an Industry: The term 'all aspects of an industry' s means strong experience in, and comprehensive understanding of, the industry that the individual is preparing to enter.

<u>Articulation Agreement:</u> The term 'articulation agreement' means a written commitment -

- A. that is agreed upon at the state level or approved annually by the lead administrators of
  - a secondary institution and a postsecondary educational institution; or
  - a sub-baccalaureate degree granting postsecondary educational institution and a baccalaureate degree granting institution; and
- B. to a program that is:
  - 1. designed to provide students with a non-duplicative sequence of progressive achievement leading to technical skill proficiency, a credential, a certificate, or a degree; and
  - linked through credit transfer agreements between the two institutions

<u>Career and Technical Education (CTE)</u>: The term 'career and technical education' means organized educational activities that

- offer a sequence of courses that:
  - o provides individuals with

coherent and rigorous academic content and relevant technical knowledge and skills needed to prepare careers in current or emerging professions, which may include high-skill, high-wage, or in demand industry sectors or occupations, which shall be, at the secondary level, aligned with the challenging State academic standards adopted by a State under section 1111 (b)(1) of the Elementary and Secondary Education Act of 1965.

provides technical skill proficiency, or a recognized postsecondary credential, which may include an industry recognized credential, a certificate or an associate degree; and may include prerequisite courses (other than a remedial course) that meet the requirement of this subparagraph; and include competency-based, work based, or other applied learning that supports the development of academic knowledge, higher-order reasoning and problem-solving skills, work attitudes, employability skills, technical skills, and occupationspecific skills, and knowledge of all aspects of an industry, including entrepreneurship, of an individual. To the extent practicable, coordinate between secondary and postsecondary education programs through programs of study, which may include coordination through articulation agreements, early college high school programs, dual or concurrent enrollment program opportunities, or other credit transfer agreements that provide postsecondary credit or advanced standing; and May include career exploration at the high school level or as early as early as grade five.

<u>Career and Technical Student Organization</u> (<u>CTSO</u>): In general, the term 'career and technical student organization means an organization for Individuals enrolled in a CTE program that engages in CTE activities as an integral part of the instructional program. Such an organization may have state and national units that aggregate the work and purposes of instruction in CTE at the local level.

### Career Guidance and Academic counseling:

- provides access for students (and parents, as appropriate) to information regarding career awareness and planning with respect to an individual's occupational and academic future
- provides information with respect to career options, financial aid, and postsecondary options, including baccalaureate degree programs.

<u>Displaced Homemaker</u>: The term 'displaced homemaker' means an Individual who -

- has worked primarily without remuneration to care for a home and family, and for that reason has diminished marketable skills;
- has been dependent on the income of another family member but is no longer supported by that income; 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 (42 U.S.C. 601 et seq.) not later than 2 years after the date on which the parent applies for assistance under such title;
- and is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment.

CTE Concentrator: The term 'CTE concentrator' means a student who has completed at least two (2) courses in a single career and technical education program of study.

<u>CTE participant</u>: The term 'CTE participant' mean an individual who completes not less than one course in a career and technical education program or program of study of an eligible recipient.

Eligible Agency: The term 'eligible agency' means a state board designed or created consistent with state law as the sole state agency responsible for the administration of CTE in the state or for the supervision of the administration of CTE in the state.

<u>Eligible Institution</u>: The term 'eligible institution' means -

- a consortium of two or more of the entities described above:
- a public or nonprofit private Institution of

higher education that offers and will use funds provided under this title in support of career and technical education courses that lead to technical skill proficiency or a recognized postsecondary credential,

- a local educational agency providing education at the postsecondary level; an area CTE school providing education at the postsecondary level;
- an Indian Tribe, Tribal organization, or Tribal education agency that operates a school or may be present in the State;
- a postsecondary educational institution controlled by the Bureau of Indian Affairs or operated by or on behalf of an Indian tribe that is eligible to contract with the Secretary of the Interior;
- · an educational services agency; or
- a tribally-controlled college or university.

### Eligible Recipient: The term 'eligible recipient'

### means -

- a local educational agency (including a public charter school that operates as a local educational agency), an area CTE school, an educational service agency, or a consortium, eligible to receive assistance under section 131; or
- an eligible institution or consortium of eligible institutions eligible to receive assistance under section 132.

### **English Learner:**

The term "English learner", when used with respect to an individual, means an individual—

- who is aged 3 through 21;
- who is enrolled or preparing to enroll in an elementary school or secondary school;
- who was not born in the United States or whose native language is a language other than English;
  - who is a Native American or Alaska Native, or a native resident of the outlying areas; and
  - who comes from an environment where a language other than English has had a significant impact on the individual's level of English language proficiency; or
  - who is migratory, whose native language is a language other than English, and who comes from an environment where a language other than English is dominant; and
  - o whose difficulties in speaking,

- reading, writing, or understanding the English language may be sufficient to deny the individual—
- o ability to meet State academic standards.
- the ability to successfully achieve in classrooms where the language of instruction is English; or
- the opportunity to participate fully in society.

Individual with a Disability: In general, the term 'individual with a disability' means an individual with any disability (as defined in section 3 of the Americans with Disabilities Act of 1990 (42 U.S.C. 12102)).

Non-traditional fields: The term 'non-traditional fields' means occupations or fields of work, such as careers in computer science, technology, and other current and emerging high skill occupations, for which individuals from one gender comprise less than 25 percent of the individuals employed in each such occupation or field of work.

# <u>Special Populations:</u> The term 'special populations' means -

- A. individuals with disabilities;
- B. individuals from economically disadvantaged families, including lowincome youth and adults;
- C. individuals preparing *for* nontraditional fields;
- D. single parents, including single pregnant women;
- E. out-of-work individuals
- F. English Learners
- G. homeless individuals as described in section 725 of the McKinney-Vento Homeless Assistance Act
- H. youth who are in, or have aged out of, the foster care system;
- I. youth with a parent is a member of the armed forces; and is on active duty

<u>Support Services:</u> The term 'support services' means services related to curriculum modification, equipment modification, classroom modification, supportive personnel and instructional aids and devices.

### Who is a CTE Student for Purposes of Perkins?

Perkins grant funds may only be spent on programs and services that benefit CTE students. Thus, in order to understand how students may be served by ALSDE and recipients through the Perkins grant, it is important to understand what constitutes a CTE student under the Act. A CTE student, for Perkins purposes, is one who elects to enroll in a career and technical education program, which is defined as a sequence of courses.

### **eGAP**

Pursuant to Section 134 of the Perkins V Act, to receive funds under Perkins V, the LEA must develop and submit an annual Perkins application and budget (including an updated budget and content changes). All amendments must be submitted via eGAP.

The eGAP application, due **October 1**, must include strategies to meet the state-determined performance levels required under the law. Each LEA must include the codes from the budget grids in their narratives to match their budgets. While this is new, most LEAs already do this. (Submitted via eGAP)

The approved eGAP application—with statement of assurance serves as the LEA's formal application for receiving Perkins funding. The assurances are at the beginning of eGAP.

### **eGAP** Timeline

By July, all eligible recipients will receive notice of an estimated preliminary allocation for planning purposes, if available. By the end of July, LEA Accounting will make local recipient allocations available in the eGAP system. ALSDE will notify all eligible recipients that the allocation and eGAP application is available and they can begin working on the application through eGAP. Technical assistance will be provided during the annual summer conference, New Directors' Meeting, and during an eGAP workday.

Throughout the application review process, if an error message appears in the eGAP system, then the application is not substantially approvable. The CTE Standards and Accountability staff will communicate about the application questions and potential issues through the Comment Section of the eGAP system. If a plan is not substantially approvable, the local applicant cannot be reimbursed for Perkins expenditures, even if those expenditures are otherwise allowable. It is very important that all applications be determined to be substantially approvable no later than October 1. eGAP applications are reviewed in the order in which they are received. Accordingly, the earlier and recipient has an approved application, the earlier it may begin to obligate funds, but the funds may not be obligated until October 1. As soon as possible after ALSDE completes its review, notifications are sent through eGAP to local recipients that grants have been completed and approved. Recipients are allowed to request revisions to their budgets throughout the year.

A budget revision may be necessary when the needs of the recipient or a specific program vary from the approved application. The CTE Standards and Accountability staff is responsible for reviewing and approving budget amendments. For programs paid through the eGAP system, the budget amendment review process is initiated with ALSDE when ALSDE receives a request through the eGAP system.

### **Local Program Application**

### **Application Components**

The Local Program Application (LPA) consists of two parts. The budgetary part will be completed in eGAP. The programmatic part will be completed in Cognia® via the CLNA. Training on how to complete the LPA will be offered at Director Meetings, Summer and Spring Conferences, and in various other platforms including, but not limited to, webinars, face-to-face sessions, and regional meetings.

### **Narrative**

The body of the local program application is structured around the specific requirements identified in section 134(b) of the Perkins V Act. A summary of these requirements is included here.

Each LEA application will include/describe:

- CLNA results CTE course offerings and activities provided with Perkins V funding
- How the LEA will:
  - Provide career exploration, development, and guidance
  - Improve academic and technical skills of CTE students
  - Prepare special populations for highskill, high-wage, or in-demand occupations, provide equal access, ensure they are not discriminated against, and prepare students for nontraditional fields
- Work-based learning opportunities available to students and how they will be developed or expanded
- Post-secondary credit opportunities for high-school students
- Recruitment, preparation, retention, and training of CTE professionals
- Gaps or discrepancies in performance
- Personnel (Pre-populated from student management system)
- Declared Programs (Pre-populated from student management system)
- New Program declaration

- Core Indicator Report
- Core Target Report
- Articulation Agreements
- Terminated Programs

The state may include additional requirements, as necessary.

# **Comprehensive Local Needs Assessment** (CLNA) Framework

New to Perkins V is the requirement for a Comprehensive Local Needs Assessment (CNLA) to be completed prior to application submission every year. Results of the CLNA must be incorporated into the local LEA application and must drive LEA spending decisions. Please note that the first question required in the local application asks for the description of the CLNA and how that work informed the selection of activities funded through Perkins V.

LEAs will submit the completed CLNA Framework document along with the local LEA application. The CLNA Framework document is a standardized reporting tool for LEAs to report their needs assessment results. LEAs will complete the CLNA in Cognia®. Data for the CLNA will be prepopulated from the student management system. The CLNA Guide will be available to CTE Directors to provide guidance on the process of conducting a needs assessment. (April 2020)

The comprehensive local needs assessment must include the following: (sec.134)

- An evaluation of student performance with respect to state-determined and local levels of performance, including an evaluation of performance for special populations and subgroups
- How CTE programs offered are of sufficient size, scope, and quality (see definitions on page 19) aligned to indemand industry sectors
- Progress toward the implementation of CTE programs and programs of study
- How local recipients will improve recruitment, retention, and training of CTE teachers, faculty, and specialized instruction support personnel
- Progress toward implementation of equal access to high-quality CTE courses and programs of study

### **Improvement Plans**

If a LEA's actual performance falls below its statedetermined performance levels for any indicator, the LEA must write an Improvement Plan for that indicator. Improvement plans must include the components in Table 1. Improvement plans should be submitted to Cognia®. See Table 1

### **Table 1: Components of the Improvement Plan**

- Identification of any special populations where gaps in performanceexist
- Contextual factors contributing to existing performance gaps
- Resources needed
- Timeline
- Person(s) responsible
- Description of how progress will be documented

# ACCOUNTABILITY, REPORTING, AND CTE DATA

# Perkins and Core Performance Indicator Definitions

Perkins V provides a list of secondary and postsecondary core performance indicators. As part of the State Plan development process, states were directed to establish how these indicators would be measured and how the populations measured (CTE participants and concentrators) would be defined. Below are the proposed operational secondary definitions for CTE students and the core indicators that will be used to report data for accountability purposes.

### **Proposed Secondary CTE Definitions**

**Participant**: Students who have taken one (1) or more courses in any CTE program area. **Concentrator**: Students who have taken (2) two courses in a single CTE program area where two-course sequences at the secondary level are recognized by the state and/or its local eligible recipients.

# **Proposed Secondary Core Accountability Indicator Definitions**

### **1S1: 4-YEAR COHORT GRADUATION RATES**

**Numerator:** Number of CTE concentrators who, in the reporting year, were included as graduated using the state's computation of its graduation rate

as describe in Section 8101 of the ESEA **Denominator:** Number of CTE concentrators who, in the reporting year were included in the state's computation of its graduation rate as defined in the state's Consolidated Accountability Plan pursuant to Section 8101 of the ESEA.

### 2S1: ACADEMIC PROFICIENCY: READING/LAN-**GUAGE ARTS**

**Numerator:** Number of CTE concentrators who have met the proficient or advanced level on the statewide high school reading assessment administered by the state under Section 1111(b) (2) of the Elementary and Secondary Education Act (ESEA) as amended by the Every Student Succeeds Act based on the scores that were included in the state's computation of reading proficiency on the federal report card and whose reading scores were included in the states reading computation on the state federal report

**Denominator:** Number of CTE concentrators who took the ESEA assessments in reading whose scores were included in the state's computation of reading proficiency for the reporting year.

### 2S2: ACADEMIC PROFICIENCY: MATHEMATICS

Numerator: Number of CTE concentrators who have met the proficient or advanced level on the statewide high school mathematics assessment administered by the state under Section 1111(b)(2) of the Elementary and Secondary Education Act (ESEA) as amended by the Every Student Succeeds Act based on the scores that were included in the state's computation of mathematics proficiency on the federal report card and whose mathematics scores were included in the state's mathematics Arts computation on the state federal report card. **Denominator:** Number of CTE concentrators who took the ESEA assessments mathematics whose scores were included in the state's computation of mathematics proficiency for the reporting year.

### 2S2: ACADEMIC PROFICIENCY: SCIENCE

Numerator: Number of CTE concentrators who have met the proficient or advanced level on the statewide high school science assessment administered by the state under Section 1111(b) (2) of the Elementary and Secondary Education Act (ESEA) as amended by the Every Student Succeeds Act based on the scores that were

included in the state's computation of science proficiency on the federal report card and whose science scores were included in the states science computation on the state federal report card.

**Denominator:** Number of CTE concentrators who took the ESEA assessments in science whose scores were included in the state's computation of science proficiency for the reporting year.

### 3S1: POST-PROGRAM PLACEMENT

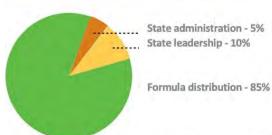
**Numerator:** Number of CTE concentrators who left secondary education and were placed in postsecondary education or advanced training. in the military service, peace corps or other programs under the National Community Service Act, or employment in the second quarter following the program year in which they left secondary education.

**Denominator:** Number of CTE concentrators who left secondary education during the reporting year.

### **4S1: NONTRADITIONAL PROGRAM CONCENTRATION**

**Numerator:** Number of CTE concentrators from underrepresented gender groups in a program that leads to employment in nontraditional fields during the reporting year. **Denominator:** Number CTE concentrators in a program that leads to employment in nontraditional fields during the reporting year.

Figure 1: Distribution of Title One Funds



Source: Strengthening Career and Technical Education for the 21st Century Act, Sec 112

### **5S1: GRADUATES WITH A POST-SECONDARY CREDENTIAL**

**Numerator:** Number of CTE concentrators who obtained industry recognized post-secondary credential during grades 8-12.

**Denominator:** Number of CTE Concentrators in graduating cohort. Alabama will remain consistent with its rigorous goals set forth in

its ESSA plan by setting goals in the same manner. Decreasing the percentage of non-proficient Career and Technical students in 2030 school year by half. Long-term goals as well as annual targets for improvement have been established for the state as well as each district and school Specific accountability data results will be published annually as required in the CAR. Because this is a four-year plan, some targets listed on the plan depict the first four years of the projected targets.

### **State Consolidated Annual Report**

Each December, Perkins V requires the state to submit the Consolidated Annual Report (CAR) to OCTAE. The CAR includes the state's progress on meeting state-determined performance levels from the most recently completed reporting year. Data regarding performance for each core indicator, and for each of the subgroups of students, special populations, and CTE cluster must be reported for each indicator.

CTE participant and concentrator counts disaggregated by subgroups of students and special populations by CTE Cluster must also be reported. The disaggregation of the data is not required if the number of students would be considered private data or potentially reveal personally identifiable data about a student.

If the state does not meet at least 90 percent of the state- determined performance level for any of the core indicators of performance for all CTE concentrators, the state will be required to implement an improvement plan during the subsequent year. The improvement plan must include an analysis of the gaps in performance among the special population and other disaggregated groups.

Whether or not the state meets their state-determined performance level on a core indicator, the state is also required to identify and quantify gaps in performance on the core indicators between any subgroups or special populations of students and CTE concentrators overall, including "a quantifiable description of the progress each such subgroup or special population of students" has made in meeting determined performance levels.

Perkins V also requires the state to publish actual levels of performance, including performance of special population and other disaggregated groups, publicly, in a variety of formats, including online.

### **PERKINS FUNDING**

The purpose of this section is to offer transparency to the Perkins federal grant state allocation and the distribution of that allocation to the sub-recipients. As specified in the Act, Perkins V Title I funds allocated to the state are distributed among three categories:

- 85 percent those provided to eligible recipients through formula-based distribution.
- 10 percent those used for state leadership activities.
- 3. **5 percent** those used for state-level administration of the grant.

In the Alabama State Plan, sub-recipients are local LEAs that serve CTE programs at the secondary and postsecondary levels. These sub-recipients receive the 85 percent formula-based allocations.

The funds allocated to the formula-based distribution category are split between secondary- and postsecondary-eligible recipients as described in the State Plan and illustrated in the chart in figure 1 above. All funds that are not used in the fiscal year awarded are recaptured and reallocated through the formula.

### **Formula Distribution**

Eighty-five percent of the Perkins state allocation flows to the Alabama LEAs by formula distribution. This 85 percent is further subdivided into the basic allocation (90 percent of the 85 percent) and the Reserve (10 percent of the 85 percent). Under Perkins V law, states can increase Reserve funds up to 15 percent of the basic allocation. *Note: states determine whether or not reserve funds are awarded and at what level.* 

### **LEAs Basic Allocation**

Calculations for the Basic Grant are based on specific attributes of the secondary and postsecondary constituents. While the dates of gathered data will change to utilize the most recent information, the basic formula remains constant. Alabama distributes 70% of the 85% to Secondary recipients and 30% to Post-Secondary recipients.

### Secondary Formula (Sec 131)

The secondary formula is based on the most

poverty.

Thirty percent of the secondary allocation is based on the following:

- **District population** of individuals aged 5-17, compared to
- State population of individuals aged 5-17

Seventy percent of the secondary allocation is based on the following:

- District population of individuals aged 5-17 in poverty, compared to
- **State population** of individuals aged 5-17 in povertv

Results for each district are multiplied by the total secondary formula amount for Alabama from the OCTAE allocation. The secondary LEA formula equals the sum of the amounts calculated for each district member in the LEA.

### Postsecondary Formula (Sec 132)

The postsecondary formula is based on the most recent number of postsecondary Pell Grant recipients. It compares:

- The number of Pell Grant recipients in the college, enrolled in Perkinseligible programs, to
- The number of Pell Grant recipients in the state, enrolled in Perkinseligible programs.

Results for each college are multiplied by the total postsecondary formula amount for Alabama from the OCTAE allocation. The postsecondary LEA formula equals the sum of the amounts calculated for each college member of the LEA.

### **LEAs Reserve Allocation**

Under Perkins V, Section 112, reserve funds may be awarded to LEAs in:

- Rural areas
- Areas with high percentages of CTE concentrators or CTE participants
- Areas with high number of CTE concentrators or CTE participants
- Areas with disparities or gaps in performance Reserve funds may be used to either foster innovation or promote the development, implementation, and adoption of programs off study or career pathways aligned with high-skill, high-wage, and/or in-demand occupations.

### **Federal Legislation**

The distribution formulas are based on both the Perkins V Act and the Alabama State Plan. Here is a brief overview of where more information can be found:

Federal Legislation: Full text of the Perkins V Act is available online through the Perkins Collaborative Resource Network

### **State Leadership Funds**

Refer to Section 112 (a) (c) of Perkins V for requirements on distribution of Leadership Funds.)

No more than ten (10) percent of the state's allocation can be set aside to carry out state leadership activities. Of this portion of the allocation, an amount of not more than two percent must be dedicated to serve individuals in state correctional facilities. Also included in the 10 percent state leadership allocation, an amount not less than \$60,000, and not more than \$150,000, must be used for services that prepare individuals for nontraditional training and employment. There are specific mandatory leadership activities (Section 124) for which leadership funds under Perkins must be used to:

- 1. Conduct State leadership activities to improve career and technical education, which shall include support for preparation for
  - a. non-traditional fields in current and emerging professions, programs for special populations, and other activities that expose students, including special populations, to highskill, high-wage, and in-demand occupations;
  - b. individuals in State institutions, such as State correctional institutions, including juvenile justice facilities, and educational institutions that serve individuals with disabilities;
- 2. Recruiting, preparing, or retaining career and technical education teachers, faculty, specialized instructional support personnel, or paraprofessionals, such as preservice, professional development, or leadership development programs; and
- 3. Technical assistance for eligible recipients; and

4. Report on the effectiveness of such use of funds in achieving the goals described in section 122(d)(2) and the State determined levels of performance described in section 113(b)(3)(A), and reducing disparities or performance gaps as described in section 113(b)(3)(C)(ii)(II).

Note that technical assistance is an allowable use under both the administration and leadership set-aside. In deciding about whether a technical assistance activity should be budgeted under leadership or administration, ALSDE should keep in mind that all administrative expenditures must be matched with non-federal funds.)

In addition to the mandatory uses listed above there are also a number of permissive uses ALSDE may spend its leadership funds on:

- 1. developing statewide programs of study, which may include standards, curriculum, and course development and include career exploration, guidance, and advisement activities and resources;
  - 2. Approving locally developed programs of study that meet the requirements established in section 122(d)(4)(B);
  - Establishing statewide articulation agreements aligned to approved programs of study;
  - 4. establishing statewide industry or sector partnerships among local educational agencies, institutions of higher education, adult education providers, Indian Tribes and Tribal organizations that may be present in the State, employers, including small businesses, and parents, as appropriate to—
    - a. develop and implement programs of study aligned to State and local economic and education needs, including, appropriate, in-demand industry sectors and occupations;
    - b. facilitate the establishment, expansion, and integration of opportunities for students at the secondary level to—
      - (i) successfully complete coursework that integrates rigorous and challenging technical and academic instruction aligned with the challenging State academic standards adopted by the State under section 1111(b)(1) of the Elementary and

- Secondary Education Act of 1965: and
- (ii) earn a recognized postsecondary credential or credit toward a recognized postsecondary credential, which may be earned through a dual or concurrent enrollment program or early college high school, at no cost to the student or the student's family; and "(C) facilitate work-based learning opportunities (including internships, externships, and simulated work environments) into programs of study;
- 5. for teachers, faculty, specialized instructional support personnel, and paraprofessionals providing career and technical education instruction, support services, and specialized instructional support services, high-quality comprehensive professional development that is, to the extent practicable, grounded in evidence-based research (to the extent a State determines that such evidence is reasonably available) that identifies the most effective educator professional development process and is coordinated and aligned with other professional development activities carried out by the State (including under title II of the Elementary and Secondary Education Act of 1965 and title II of the Higher Education Act of 1965), including programming that-
  - a. promotes the integration of the challenging State academic standards adopted by the State under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965 and relevant technical knowledge and skills, including programming jointly delivered to academic and career and technical education teachers;
  - b. prepares career and technical education teachers, faculty, specialized instructional support personnel, and paraprofessionals to provide appropriate accommodations for students who are members of special populations, including through the use of principles of universal design for

- learning, multi-tier systems of supports, and positive behavioral interventions and support; and
- c. increases the ability
  of teachers, faculty,
  specialized instructional support
  personnel, and
  paraprofessionals providing
  career and technical education
  instruction to stay current with
  industry standards and earn an
  industry- recognized credential
  or license, as appropriate,
  including by assisting
  those with relevant industry
  experience in obtaining State
  teacher licensure or credential
  requirements;
- supporting eligible recipients in eliminating inequities in student access to—
  - a. high-quality programs of study that provide skill development; and
  - effective teachers, faculty, specialized instructional support personnel, and paraprofessionals;
- 7. awarding incentive grants to eligible recipients—
  - for exemplary performance in carrying out pro- grams under this Act, which awards shall be based on—
  - (i) eligible recipients exceeding the local level of performance on a core indicator of performance established under section 113(b)(4)(A) in a manner that reflects sustained or significant improvement;
  - '(ii) eligible recipients effectively developing connections between secondary education and postsecondary education and training;
  - (iii) the integration of academic and technical standards;
  - (iv) eligible recipients' progress in closing achievement gaps among subpopulations who participate in programs of study; or
  - (v) other factors relating to the performance of eligible recipients under this Act as the eligible agency determines are appropriate; or

- b. If an eligible recipient elects to use funds as per- mitted under section 135(c);
- 8. providing support for-
  - a. the adoption and integration of recognized postsecondary credentials and work-based learning into programs of study, and for increasing data collection associated with recognized postsecondary credentials and employment out- comes; or
  - b. consultation and coordination with other State agencies for the identification and examination of licenses or certifications that—

    pose an unwarranted barrier to entry into the workforce for career and technical education students; and (ii) do not protect the health, safety, or welfare of consumers;
  - the creation, implementation, and support of pay for success initiatives leading to a recognized postsecondary credential;
  - support for career and technical education programs for adults and out-of-school youth concurrent with their completion of their secondary school education in a school or other educational setting;
  - 11. the creation, evaluation, and support of competency- based curricula;
  - support for the development, implementation, and expansion of programs of study or career pathways in areas declared to be in a state of emergency under section 501 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5191);
  - partnering with qualified intermediaries to improve training, the development of public-private partnerships, systems development, capacity-building, and scalability of the delivery of high-quality career and technical education;
  - improvement of career guidance and academic counseling programs that assist students in making informed academic and career and technical education decisions, including academic and financial aid counseling;
  - support for the integration of employability skills into career and technical education programs and programs of study;
  - 16. support for programs and activities that increase access, student engagement, and success in science, technology, engineering, and mathematics fields (including computer science, coding, and architec-

- ture), support for the integration of arts and design skills, and support for hands-on learning, particularly for students who are members of groups underrepresented in such subject fields, such as female students, minority students, and students who are members of special populations;
- 17. support for career and technical student organizations, especially with respect to efforts to increase the participation of students in nontraditional fields and students who are members of special populations;
- support for establishing and expanding work-based learning opportunities that are aligned to career and technical education programs and programs of study;
- 19. integrating and aligning programs of study and career pathways;
- 20. supporting the use of career and technical education programs and programs of study aligned with State, regional, or local highskill, high-wage, or in-demand industry sectors or occupations identified by the State workforce development board described in section 101 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3111) or local workforce development boards:
- 21. making all forms of instructional content widely avail- able, which may include use of open educational resources;
- 22. developing valid and reliable assessments of competencies and technical skills and enhancing data systems to collect and analyze data on secondary and postsecondary academic and employment outcomes;
- 23. support for accelerated learning programs, as described in section 4104(b)(3)(A)(i)(IV) of the Elementary and Secondary Education Act of 1965, in the case of any such program that is part of a career and technical education program of study;
- 24. support for career academies to implement a postsecondary education and work-force-ready curriculum at the secondary education level that integrates rigorous academic, technical, and employability contents through career and technical education programs and programs of study that address needs described in the comprehensive needs assessment under section 134(c); and
- 25. other State leadership activities that improve career and technical education.

### **State Administration Funds**

The Perkins V Act, Section 112(a)(3), allows Alabama to set aside no more than five percent of the state's allocation or \$250,000, whichever is greater, for administration of the state plan. These dollars are limited to the following uses:

- Developing the state plan
- Reviewing a local application
- Monitoring and evaluating program effectiveness
- Assuring compliance with all applicable federal laws
- Providing technical assistance
- Supporting and developing state data systems relevant to the provisions of the Perkins V Act

Dollars set aside for state administration must be matched on a dollar-for-dollar basis from non-federal sources.

### FINANCIAL REQUIREMENTS

This section provides for the specific uses of funds for which a LEA is authorized to spend its Perkins allocation and how much must be spent toward each use. Perkins is dedicated to increasing learner access to high-quality Career Technical Education (CTE) programs of study. With a focus on systems alignment and program improvement, this funding is critical to ensuring that programs are prepared to meet the ever- changing needs of learners and employers.

### **Requirements for Local Uses of Funds**

To expend their allocated basic and reserve funds, each LEA develops and submits an annual plan addressing the requirements identified in Sec. 134 of the Perkins V Act. At this sub-recipient (LEA) level, expenditures are based on the approved eGAP application and Comprehensive Local Needs Assessment. The following discussion is meant to give guidance to LEAs in decision-making. Each Local Education Agency who accepts Perkins V funding becomes the fiduciary of the Perkins V grant. As such each LEA should establish internal controls as set forth in 2 CFR Part 2. § 200.61 Internal controls.

Internal controls mean a process, implemented by a non-Federal entity, designed to provide reasonable assurance regarding the achievement of objectives in the following categories:

- (a) Effectiveness and efficiency of operations;
- (b) Reliability of reporting for internal and external use: and
- (c) Compliance with applicable laws and regulations.§ 200.62 Internal control over compliance requirements for Federal awards. *Internal control over compliance requirements for Federal awards* means a process implemented by a non-Federal entity designed to provide reasonable assurance regarding the achievement of the following objectives for Federal awards:

  (a) Transactions are properly recorded and
- (a) Transactions are properly recorded and accounted for, in order to:
  - (1) Permit the preparation of reliable financial statements and Federal reports;
  - (2) Maintain accountability over assets; and
  - (3) Demonstrate compliance with Federal statutes, regulations, and the terms and conditions of the Federal award:
- (b) Transactions are executed in compliance with:
- (1) Federal statutes, regulations, and the terms and conditions of the Federal award that could have a direct and material effect on a Federal program; and
- (2) Any other Federal statutes and regulations that are identified in the Compliance Supplement; and
- (c) Funds, property, and other assets are safeguarded against loss from unauthorized use or disposition.

### **Perkins V Section 135**

Each local recipient receiving funds under Perkins V may not use more than five (5) percent of allocation for administrative purposes. The remainder of the allocation must be used to develop, to coordinate, to implement, or to improve CTE programs that meet the needs identified in the CLNA. The activity must be identified in the CLNA in order to spend Perkins funds on the activity. There must be a clear linkage between the needs assessment and how funds are spent.

eGAP applications should have a Goal, a strategy, an action step. Each Goal should be linked to one of the following five allowable uses of funds from Section 135 of Perkins V.

Provide career exploration and career development activities through and organized, systematic framework designed to aid students, including in the middle grades, before enrolling and while participating in a CTE program, in making informed plans and decisions about future education and career opportunities and programs of study.

- 2. Provide professional development forteacher, faculty school leaders, administrators, specialized instructional support personnel, career guidance and academic counselors, or paraprofessionals.
- 3. Provide within CTE the skills necessary to pursue careers in high-skills, high-wage, or indemand industry sectors or occupations.
- 4. Support integrations of academic skills into CTE programs and programs of student to support CTE participants at the secondary school level in meeting the challenging academic standards adopted under ESEA by the state.
- 5. Plan and carry out elements that support the implementation of CTE programs and programs of study that result in increasing student achievement on performance indicators.

The TAPE will serve as the evaluation tool required by law to evaluate how activities carried out improved the CTE program.

When utilizing Perkins V funding, expenditures must:

- The funding is for the purpose of development, implementation, refinement, or support of an approved CTE program or Program of Study.
- Funding is allocable according to the Perkins V Act.
- There is no supplanting. You cannot use federal funds to pay for equipment, staff, programs, or materials that would otherwise be paid for with state or local funds. In other words, the expenditure was not previously funded with local funding.
- 4. The expenditure is reasonable and necessary for the plan's execution.

Supplement versus supplant is a frequent question. Section 211(a) of Perkins V clearly states: "SUPPLEMENT NOT SUPPLANT—Funds made available under this Act for career and technical education activities shall supple- ment, and shall not supplant, non-federal funds expended to carry out career and technical education activities. "Perkins funds shall supplement, not supplant (replace), non- federal funds expended for CTE. If an activity is, or has been, supported by non-federal funds, Perkins funds may not be used to support that activity unless there is overwhelming evidence that the activity would be terminated. if federal funds were not available.

Seek state advice before proceeding under this exception. If the LEA would normally pay for an item, service, or activity, then Perkins dollars should not be used. Funds available to LEAs under Section 135 of Perkins V shall be used to support CTE programs that are of sufficient size, scope, and quality to be effective and that:

- Provide career exploration and career development activities
- Provide professional development for CTE professionals
- Provide within CTE the skills necessary to pursue careers in highskill, high-wage, and/or in-demand industry sectors or occupations
- Support integration of academic skills into CTE programs and programs of study
- Plan and carry out elements that support the implementation of CTE programs and programs of study that result in increasing student achievement of the local levels of performance established under section 113
- Develop and implement evaluations of the activities carried out with funds under Section 135

Refer to Perkins V Section 135 for a complete description of requirements for uses of funds at the local level.

LEAs should also be mindful of 2 CFR Part 200 to identify Direct Costs and Indirect Costs to the Perkins Grants. Direct costs are those expenditures that are clearly identified specifically with a final cost objective with a high degree of accuracy. §200.413 Indirect costs are those costs incurred for a common or joint purpose, and it is difficult to assign the cost to one cost objective. An example of indirect cost would be the electricity bill for a technology center that shares a building with a high school. §200.56

# Algorithm for Making Local Funding Decisions

When determining whether or not the use of federal Perkins V grant funds is appropriate, the local CTE Director should consider the following questions:

- 1. Does this use of funds constitute "supplanting" of other funding sources?
- Is the expense reasonable? Does it meet the intent of size, scope, and quality as specified in the Perkins V law and in the Alabama stateplan?

- 3. Is the expense necessary? For example, what are the consequences if Perkins funds are not used?
- 4. Is the expense allocable? For example, does the expenditure comply with the six required uses of funds specified in Section 135(b) of Perkins V and with the Education Department General Administrative Regulations (EDGAR)? Be prepared to identify and describe the following specific considerations as they apply to the expenditure:
  - a. Which Perkins V required use of funds under Section 135(b) is being addressed?
  - b. How does the expenditure support the LEA's program of study?
  - c. How does the expenditure support the recruitment, retention, and training of CTE professionals?
  - d. How does the expenditure support special populations as identified in Perkins V?
- 5. Does the comprehensive local needs assessment support the expenditure?
- 6. Has the expenditure been vetted with your LEA's advisory committee?
- 7. Is the focus of the expenditure on LEA's alignment and program improvement?
- 8. Will the cost or activity result in increased student achievement of the local levels of performance?

### Size, Scope, and Quality

Section 135 of Perkins V states, "Funds made available to eligible recipients ... shall be used to support CTE programs that are of sufficient size, scope, and quality." The Perkins V Act does not define size, scope, and quality, but instead leaves it to individual states to interpret. Alabama has defined size, scope, and quality as the following:

### Size

Parameters and/or resources that affect whether the program can adequately address student learning outcomes; this includes:

- Number of students within a program
- Number of instructor/staff involved with the program
- Number of courses within a program
- Available resources for the program (space, equipment, supplies)

### Scope

 Programs of study are part of or working toward inclusion within a clearly defined career pathway with multiple entry and exit

### points

- Programs of study are aligned with local workforce needs and skills
- Postsecondary programs connect with secondary CTE via articulation agreements and/or dual credit, etc.
- Programs develop not only specific workbased skills, but also broadly applicable employability skills

### Quality

A program must meet two of the following three criteria to meet Alabama's standard of quality. The program develops:

- · High-skilled individuals,
- Individuals who are competitive for high wage jobs, and individuals who are trained for in-demand occupations
- High-skilled: individuals completing programs resulting in industryrecognized certificates, credentials, or degrees
- High-wage: Above the median wage for all occupations, based on Local Market Indicator data and/or data from JobsEQ®

### Allowable and Unallowable Uses of Funds

Allowable and Unallowable Uses of Funds reflect additional requirements for spending Perkins dollars that are specified by the Education Department General Administrative Regulations (EDGAR), U.S. Office of Management and Budget Circulars, Alabama State Law, ALSDE policies and Alabama State policies. Note that an allowable cost must be referenced in each LEA Plan.

Under Perkins V law, expenditures that support CTE in the "middle grades" (which includes grades 5 through 8) are now allowable.

### **ALLOWABLE USES OF FUNDS**

- Develop and implement evaluation of the activities carried out with funds under this art, including evaluations necessary to complete the required comprehensive needs assessment
- CTE Interest, Aptitude, and Ability Inventories (with LEA/state approval)
- CTE-related software (with LEA/state approval)
- CTE student organizations (advisor travel, instructional materials/supplies—nonconsumables)
- Charter schools

- Contracted services
- Curriculum development/curriculum modification—CTE/ state-approved programs
- Equipment/equipment upgrade (preapproved) to meet industry standards
- Expenditures for CTE career exploration and awareness down to the middle grades, including grades 5 through 8.
- If on official travel for the CTE program, travel costs, including meals, can be allowable(must have agenda). Note if simply driving across town for a meeting at a school, food would NOT be allowed by the USDE.
- Instructional materials and supplies related to CTE programs (Not consumables)
- Meetings and conferences (registration fees, travel costs) related to CTE programs
- Professional development costs for CTE personnel
- Professional development related to CTE for non-CTE teachers/faculty/counselors (involved in CTE initiatives such as programs of study, academic technical integration, career awareness activities)
- Professional service costs (consultants)
- Program Advisory Committees
- Program evaluation
- Substitute pay for CTE teachers
- Supplemental Support Services for Perkins special populations
- Supportive personnel/instructional aids and devices
- Teacher/faculty CTE in-services
- Training costs (administrative, instructor, Perkins staff)
- Transportation costs incurred for approved CTE programs, workshops, professional development for Career and Technical Student Organization competitions (administrators, counselors/advisors, CTE instructors, Perkins staff)

### **UNALLOWABLE USES OF FUNDS**

- Alcoholic beverages
- Alumni/ae activities
- CTE Personnel and benefits
- Childcare
- Commencement and convocation costs
- Construction, renovation, and/or remodeling of facilities
- Contributions and donations (cash, property, services)
- Entertainment amusement and social activities (sports tickets)
- Expenditures for non-approved CTE programs
- Expenditures for career education prior to the middle grades (grades 5 through 8)

- Expenditures that supplant
- Fines and penalties
- Fundraising
- Gifts
- Goods or services for person use
- Items retained by students (supplies, clothing/uniforms, tools,
- calculators)
- Monetary awards
- Furniture
- Postsecondary customized training courses and programs
- Political activities such as contributions, fund raising or lobbying
- Promotional materials (T-shirts, pens, cups, key chains, book bags, etc.)
- Remedial (developmental) courses at both secondary and postsecondary levels
- Scholarships
- Student expenses/direct assistance to students (tuition, tools, fees, car repair, etc.)
- Student stipends
- Vehicles, unless used for CTE instruction

# **Career and Technical Student Organization** (CTSO) Activities

- Individual student lodging, and meals do not qualify as a permissible Perkins expenditure
- Advisor travel, lodging and meals must include staff- development activities for licensed CTE staff (Perkins funds are not allowable for chaperones only)
- All Perkins funding recipients must be licensed CTE teachers/administrators or counselors
- All members of the student organization or class/ program must have an opportunity to participate in the funded activity (This opportunity may reflect qualifying competitive performance or participation)

# Perkins V – 5 percent Administrative Cost Allowances

Perkins V allows eligible LEAs to use up to, but not more than, 5 percent for administrative costs. Administration is defined as activities necessary for the proper and efficient performance of the eligible fiscal and data collection responsibilities under the Perkins V Act.

### **Fiscal Year Expenditure Timelines**

Perkins V does not allow LEAs to carry over unexpended funds from one fiscal year to the next. All expenditure orders must be encumbered by **September 30** of the Local Application State fiscal year. Attempts should be made to pay all invoices by **September 30** of the fiscal year.

Local LEAs are responsible for prudent cash management.

### **Capital Assets (Equipment)**

Equipment purchases must be permissible according to Perkins V, Section 135(b). Allowable use, disposition, and record- keeping requirements as defined by Education Department General Administrative Regulations (EDGAR) must be followed.

### Procurement

All LEAs must follow Federal Procurement Laws as set forth in 2 CFR Part 200.

- § 200.318 General procurement standards.
- (a) The non-Federal entity must use its own documented procurement procedures which reflect applicable State and local laws and regulations, provided that the procurements conform to applicable Federal law and the standards identified in this section.
- (b) Non-Federal entities must maintain oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.
- (c)(1) The non-Federal entity must maintain written standards of conduct covering conflicts of interest and governing the performance of its employees engaged in the selection, award and administration of contracts. No employee, officer, or agent must participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract. The officers, employees, and agents of the non-Federal entity must neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. However, non-Federal entities may set standards for situations in which the financial

interest is not substantial, or the gift is an unsolicited item of nominal value. The standards of conduct must provide for disciplinary actions to be applied for violations of such standards by officers, employees, or agents of the non-Federal entity.

- (2) If the non-Federal entity has a parent, affiliate, or subsidiary organization that is not a state, local government, or Indian tribe, the non-Federal entity must also maintain written standards of conduct covering organizational conflicts of interest. Organizational conflicts of interest means that because of relationships with a parent company, affiliate, or subsidiary organization, the non-Federal entity is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization.
- (d) The non-Federal entity's procedures must avoid acquisition of unnecessary or duplicative items. Consideration should be given to consolidating or breaking out procurements to obtain a more economical purchase. Where appropriate, an analysis will be made of lease versus purchase alternatives, and any other appropriate analysis to determine the most economical approach.
- (e) To foster greater economy and efficiency, and in accordance with efforts to promote cost-effective use of shared services across the Federal government, the non-Federal entity is encouraged to enter into state and local intergovernmental agreements or inter-entity agreements where appropriate for procurement or use of common or shared goods and services.
- (f) The non-Federal entity is encouraged to use Federal excess and surplus property in lieu of purchasing new equipment and property whenever such use is feasible and reduces project costs.
- (g) The non-Federal entity is encouraged to use value engineering clauses in contracts for construction projects of sufficient size to offer reasonable opportunities for cost reductions. Value engineering is a systematic and creative analysis of each contract item or task to ensure that its essential function is provided at the overall lower cost.
- (h) The non-Federal entity must award contracts only to responsible contractors possessing the ability to perform successfully under the terms and conditions of a proposed procurement. Consideration will be given to such matters as contractor integrity, compliance with public policy, record of past performance, and financial and technical resources.
- (i) The non-Federal entity must maintain records sufficient to detail the history of procurement. These records will include, but are not

- necessarily limited to the following: rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price.
- (j)(1)The non-Federal entity may use time and material type contracts only after a determination that no other contract is suitable and if the contract includes a ceiling price that the contractor exceeds at its own risk. Time and material type contract means a contract whose cost to a non-Federal entity is the sum of:
  - (i) The actual cost of materials; and
  - (ii) Direct labor hours charged at fixed hourly rates that reflect wages, general and administrative expenses, and profit.
  - (2) Since this formula generates an openended contract price, a time-and materials contract provides no positive profit incentive to the contractor for cost control or labor efficiency. Therefore, each contract must set a ceiling price that the contractor exceeds at its own risk. Further, the non-Federal entity awarding such a contract must assert a high degree of oversight in order to obtain reasonable assurance that the contractor is using efficient methods and effective cost controls.
- (k) The non-Federal entity alone must be responsible, in accordance with good administrative practice and sound business judgment, for the settlement of all contractual and administrative issues arising out of procurements. These issues include, but are not limited to, source evaluation, protests, disputes, and claims. These standards do not relieve the non-Federal entity of any contractual responsibilities under its contracts. The Federal awarding agency will not substitute its judgment for that of the non-Federal entity unless the matter is primarily a Federal concern. Violations of law will be referred to the local, state, or Federal authority having proper jurisdiction.

# **Criteria for Secondary Perkins Funded Purchases**

- Classroom/lab equipment and curriculum/licensure funded through Perkins must be used to support courses within a state-approved CTE program
- The CTE course must be taught by a CTE-certified teacher holding a current CTE certificate in that discipline (Alternative certificates, such as emergency, temporary, or and equivalent certificates will all qualify for Perkins funding)
- All Perkins-funding recipients must be licensed CTE teachers/ administrators or

- counselors unless special permission has been granted (A waiver is required)
- All Perkins-funded purchases must support CTE students
- Perkins funding must not be used to supplant existing (non-federal) funding sources
- Equipment purchased through the Perkins grant must have the priority of use dedicated to CTE students however, incidental use by non-CTErelated students is allowable.
- Perkins grant use for any portion of this funding requires adherence to the above criteria (Equipment purchased through the Perkins grant must have the priority of use dedicated to CTE students; however, incidental use by CTE- related students is allowable)
- Funding for classroom/lab equipment and curriculum/ license may come from multiple sources (Perkins grant used for any portion of this funding requires adherence to the above criteria)

## Requirements for State Pre-Approval of Secondary Equipment Purchases

Secondary equipment and curriculum purchase that equal \$5,000 or more require pre-approval before the LEA authorizes the district to make the expenditure from Perkins grant funds. (This \$5,000 threshold is per individual unit of equipment or curriculum.)

### Secondary Equipment and Curriculum Purchases-Grant Management

ALSDE approval of the annual Perkins LEA eGAP application establishes a fiduciary relationship between the Perkins LEA and ALSDE. Because of this relationship, all secondary equipment approval requests must be submitted from and granted to the secondary Perkins LEA Coordinator of record.

All secondary equipment and curriculum purchases, inclusive of those under the \$5,000 threshold, must be included in the Perkins LEA's equipment inventory list. A master Perkins LEA Equipment Inventory should be reviewed annually, and an onsite inventory is required annually.

All equipment and curriculum items purchased with secondary Perkins funding must be identified (tagged) and included in the building inventory of the school district where it is located. On-site inventory is required annually. according to the EDGAR Grant Regulations, found at https://www2.ed.gov/policy/ fund/reg/edgarReg/edgar.html.

All equipment and curriculum items must be tagged as purchased with Perkins federal funds. These items must be included in the LEA filed Consolidated Annual Report (CAR) at the end of the Perkins fiscal year.

### Inventory Control Requirements for Secondary Equipment and Curriculum Purchased Through Perkins Grant Funding

The responsibility for maintaining inventory control of secondary equipment and curriculum purchased with Perkins funding remains with the Perkins LEA. LEAs are requested to have a single "master" inventory directory which is validated/reconciled annually. Inventory control is required for all equipment and curricula purchased with Perkins grant funds.

Inventory control records should include the following:

- Equipment/curriculum description (serial numbers, model numbers, physical description, etc. as applicable)
- Date of acquisition
- Original expenditure
- Source of funding for equipment/curriculum
- Location and condition of equipment/curriculum (school building, room location, CTE-approved program(s)
- Space for inventory record—inventory procedures may follow school district policy—Perkins equipment/ curriculum inventory is required annually
- Corresponding physical tag number when applicable
- Space for final disposition of equipment
- When possible, a physical tag should be permanently fastened to, or stamped on, each item of equipment/ curriculum indicating Perkins funded expenditure. This tag must be identifiable to the inventory record
- If applicable notation of who holds the title to the property
- Percentage of federal participation in the project costs for the federal award which the property was acquired

# Disposal of Equipment/Curriculum Purchased Through the Secondary Perkins Grant

All items purchased with Perkins funds must be used for Perkins purposes. When it is determined that equipment or a non-consumable supply purchased with Perkins funds is no longer needed for the intent for which it was originally purchased the property can still be used, the LEA will first determine if another federal program can use the item.

Additionally, best efforts should be made to use the item until it is obsolete or no longer working. Once the item is no longer usable, pursuant to 2 CFR §200.313(e).

2 CFR § 200.313(c)(4) allows the proceeds of a sale of old equipment to go towards the purchase of replacement equipment.

- 1. Items of equipment with a current per-unit fair market value of less than \$5,000 may be retained, sold, or otherwise disposed of with no further obligation to the awarding agency.
- Items of equipment with a current per unit fair market value in excess of \$5,000 may be retained or sold and the awarding agency shall have a right to an amount calculated by multiplying the current market value or proceeds from sale by the awarding agency's share of the equipment.
- 3. All disposition of equipment must be reported on the annual CAR report. The respective LEA inventory must reflect the disposal.
- 4. Equipment disposal records including inventory documentation, disposal, salvage recovery funds and any transfer information need to be retained by the LEA for three years.

### Lost and Stolen Items

All items that ALSDE staff members believe may be lost or stolen must be reported to the Property Manager. The property manager will conduct an investigation of all lost items. If it is determined that an item is lost due to the negligence of an individual, that person is responsible for the cost of that item. If an item is stolen, then a police report must be filed.

### **Record Keeping**

ALSDE and all recipients must maintain records and accounts in a manner that ensures a full accounting of all funds received and expended in connection With the Perkins grant. These records and accounts must be retained and made available for programmatic audits and monitoring. All recipients must retain records for a minimum of 5 years from the end of each grant period to document program effectiveness. Any records involving student information must meet applicable FERPA requirements under 34 CFR Part 99.

# **Tool for Assessing Program Effectiveness** (TAPE)

The Tool for Assessing Program Effectiveness (TAPE) is used to assess each CTE program as declared on the Local Education Agency (LEA) Local Program Application (LPA). The TAPE tool is to be administered as a part of the LEA's comprehensive plan addressing administration and management of CTE programs.

### **Procedural Alignment:**

State Department of Education (SDE) Team Members will conduct TAPE visits to align with the annual Federal Comprehensive Compliance Monitoring Schedule.

- Every CTE program (exception Middle School programs) in the LEA will be measured for offering quality instruction and programs. However, middle school programs may be subject to review or based on request for a review of programs.
- CTE program visits will be scheduled every five years as aligned with the annual Federal Comprehensive Compliance Monitoring Schedule. LEAs NOT aligned to the monitoring schedule will undergo a CTE review process based on the following conditions:
  - o The LEA has preexisting Compliance Monitoring findings, or
  - o The LEA has findings as documented in the COGNIA eProve Platform and have been placed on alert for the completion of a corrective action plan, or
  - o The LEA specifically request a review of CTE programs.
- In the event of scheduling conflicts (e.g. CTSO state conferences) the TAPE review schedule may be adjusted.
- SDE Team Members will conduct TAPE reviews. Every effort will be made to align CTE staff to program specific areas.

Each CTE program is measured using Quality Program Indicators (QPI). QPI descriptors provide CTE administrators with levels of attainment to evaluate the quality of the CTE programs. Each QPI descriptor is based on three levels of implementation as defined here: Level 1- Does not meet standards, Level 2 – Meets minimum standards, and Level 3 – Exceeds standards.

### TAPE visits will be conducted as follows:

An entrance conference will

- be conducted with the CTE Director and Superintendent (if available). CTE teachers will remain in assigned classrooms providing quality instruction during the monitoring process, therefore not recommended to be in attendance for the entrance conference.
- CTE programs will be visited by the SDE Team Member assigned to conduct the review. Visits to each CTE program within an LEA mayoccur over a single day or multiple days given the size of the LEA and number of declared CTE programs.
- Upon completion of the TAPE visit, an exit conference will be conducted with the CTE Director. The SDE Team Member will compile all details relating to TAPE visits into the Cognia® eProve Platform and within two weeks of the last day of the on-site visit.

### **TAPE Prework in advance of scheduled visits:**

Desk Audit: Certain documents will be submitted through the Cognia® eProve Platform as requested by SDE Team Member assigned to conduct the review of CTE programs. Requested documents must be uploaded to the Cognia® eProve Platform a minimum two weeks prior to the scheduled TAPE visit.

### **TAPE Procedural Implications:**

- Any CTE program within the LEA to receive a Level One (1) on any QPI will be required to submit a corrective action plan for each indicator in which a level one score is received. The LEA will have up to 60 days (from the last day of the exit conference) to submit documentation to the SDE.
- SDE Team Members will be available to provide technical assistance to an LEA for questions related to the requirements of a corrective action plan. The following action is to be taken for acceptance of LEA submitted corrective action plans:
  - The LEA will upload evidence of compliance for each indicator for which a level one was earned to the ALSDE through the COGNIA eProve Platform.
  - o SDE Team Member will provide written notification of acceptance and file will be noted in the COGNIA eProve Platform.
- If the corrective action plan submitted is NOT approved, SDE Team Member will provide technical assistance to the LEA for

the development of a corrective action plan. The LEA will have one calendar year (from the last day of the exit conference) to correct all findings and work to provide a corrective action plan for implementation to fidelity.

- Example: TAPE review completion date March 20, 2020. The corrective action plan would be due to SDE 60 days after review on May 19, 2020 (60 days), implementation to fidelity completed by May 19, 2021 (one year).
- If the LEA does not implement the corrective action plan to correct all findings within one calendar year (from the last day of the exit conference), the LEA will not be able to utilize Perkins funding on those programs.

# **Career Readiness Indicator Procedures**

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Each LEA must declare the Career and Technical Education programs the LEA will offer by September 30 of each school year in the student management system. Directions for doing so are provided in this handbook. LEAs will only count those credentials for programs that have been declared for accountability. Programs declared must be approved by ALSDE before they are declared. A list of approved Career Readiness Indicators can be located at <a href="https://www.alsde.edu">www.alsde.edu</a>, and the list is updated each year on August 1.

### **Monitoring**

### High-Risk Rating

As a result of the language set forth in 2 CFR 200 (Uniform Administrative Requirements, Cost Principals, and Audit Requirements of Federal Awards), a risk-based monitoring system will be implemented. Utilizing the point values listed in the ratings categories identified in Appendix B, LEAs will be ranked from highest point value to lowest. The resulting rankings will determine the high-risk LEAs. The top 15% of the districts with the highest risk will be identified for monitoring. Based upon the specific rating criteria, each section will determine which method of monitoring shall be administered (on-site or desk review).

Once the high-risk rankings are determined, each section will review the list to determine if any low-risk districts need to be eligible for Enhanced Self-

Monitoring.

### **Types of Monitoring**

1. On-Site Monitoring

LEAs identified as high-risk may be monitored on site. Onsite monitoring is a physical visit to the LEA with the specific intent of interviewing LEA staff (main office, schools, or other facilities) face to face to determine compliance. LEAs designated for onsite monitoring are provided an official report of the outcome of the review. A combination of ALSDE full-time and Retired State Employees will be utilized for on-site monitoring.

2. Self-Assessment Monitoring

A self-assessment will be completed annually by each LEA. A signed Document of Assurance will be submitted to the ALSDE attesting to local compliance of all state and federal requirements. This document will be due no later than September 15 of each year. In addition, LEAs will have an opportunity to request technical assistance in any program area. Failure to timely submit the Self-Assessment instrument could result in an on-site monitoring event.

3. Desk Review Monitoring

Desktop monitoring is a remote review of the LEA that is conducted by telephone and electronic communications between ALSDE and LEA staff. Staff in schools and other facilities are typically not interviewed; however, the ALSDE reserves the right to physically visit a LEA selected for desktop monitoring. LEAs designated for desktop monitoring are provided an official report of the outcome of the review.

### 4. Technical Assistance

LEAs may be provided official Technical Assistance annually either by official request from the LEA or through procedures defined in *Administrative Alabama Administrative Code* §16-6B-3.

5. High-Risk Assessment

The annual high-risk assessment conducted by the ALSDE shall be considered a form of monitoring.

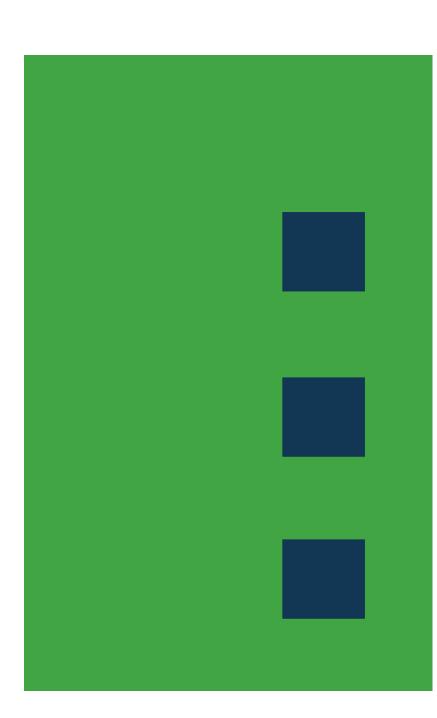
6. Enhanced Self-Monitoring

Enhanced self-monitoring is a designation given to LEAs that received a low Risk Score but may not require onsite or desktop monitoring. LEAs selected for enhanced self-monitoring will be expected to provide

a progress report or additional documentation beyond what is expected of regular self-assessment. Typically, there will not be interviews with LEA staff or a monitoring report.

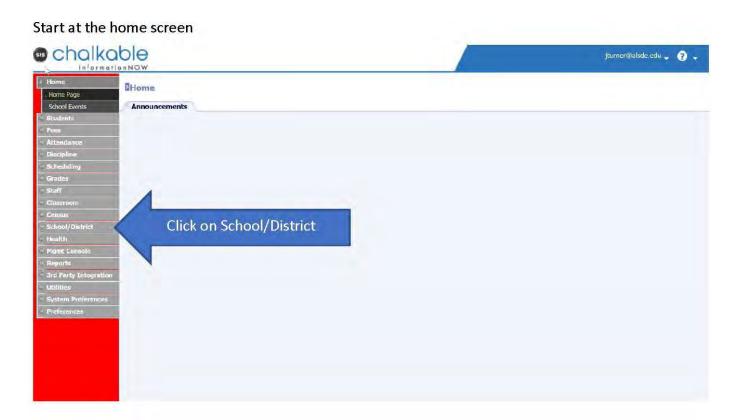
Citations resulting from Non-Compliance

LEAs that have citations from an on-site monitoring or desk review monitoring will have 60 days to develop and to implement a Corrective Action Plan ad- dressing any deficiencies. If, at the end of 60 days, citations still exist, federal and state funds may be withheld until compliance is attained. In addition, the LEA will be subjected to on-site monitoring the subsequent year.

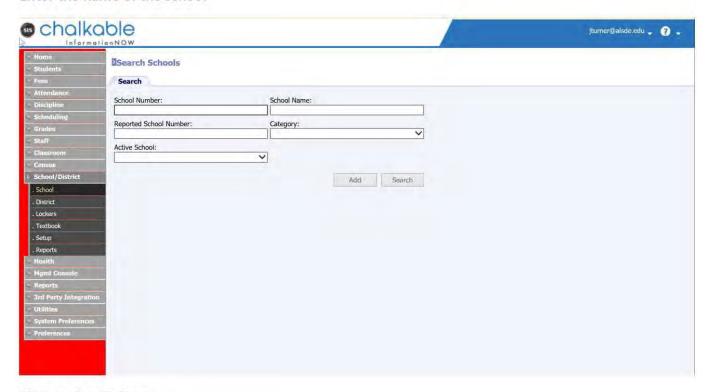


### **Program Declaration in Chalkable**

Please see your District Chalkable Contact for the rights you will need to perform this. Please perform declare programs for each school year.



### Enter the name of the school



Click on the CT Programs

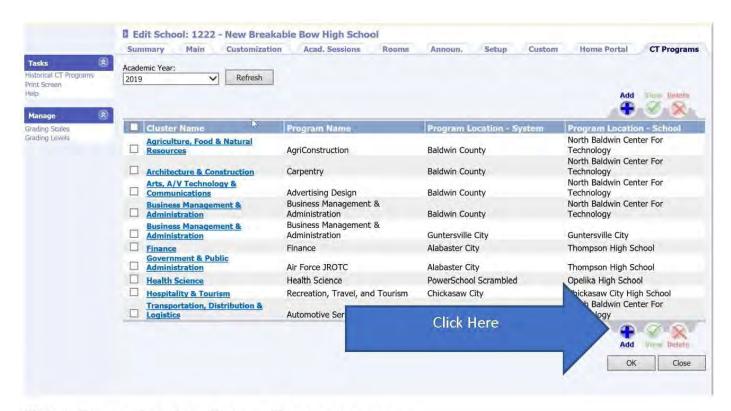


Click on Academic Year.

Choose the school year.



Click on blue "Add" button.



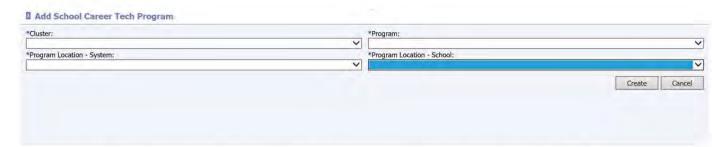
Click on Program Location – System: Choose your system

Click on Program Location – School: Enter the School Name for Cluster and Program Declaration

Click on Cluster — Choose cluster from drop down menu

Click on Program - Choose program from drop down menu

### Click create



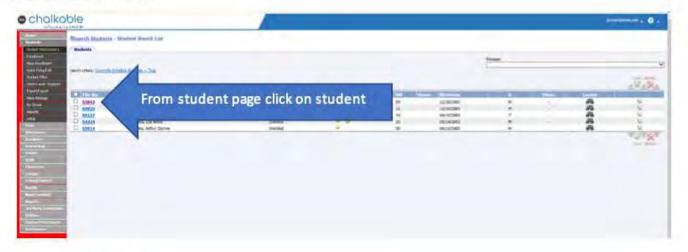
A data certification statement will pop up. Certify that the program entered is correct.



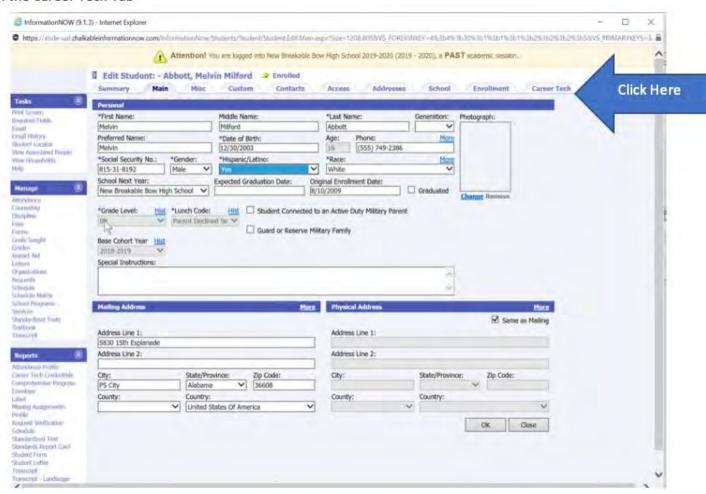
Complete for all schools that have CTE Programs.

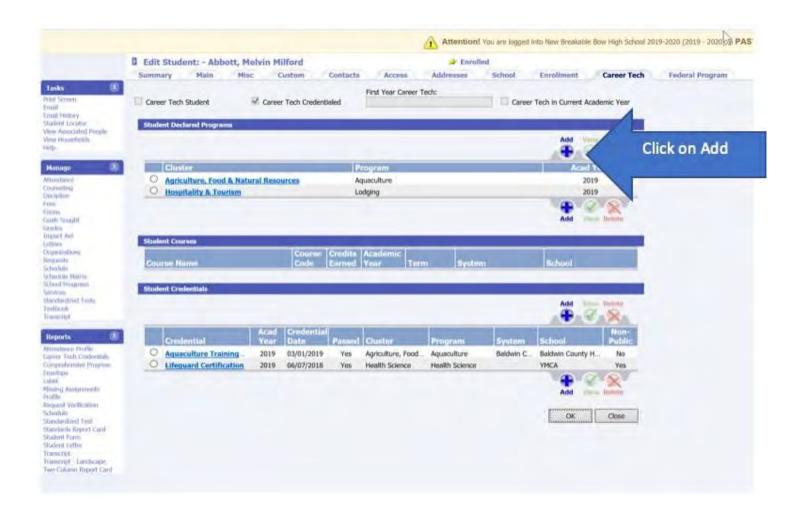
### Student Declared Programs

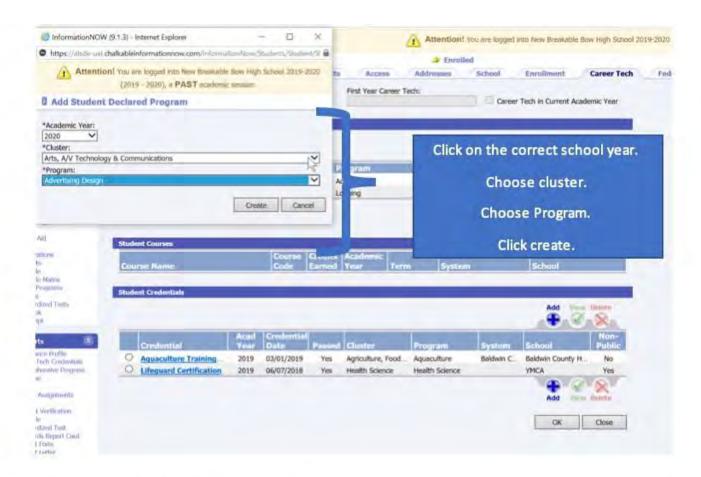
### Must be completed each year.



### Click on the Career Tech Tab







A data certification screen will appear. Click agree. You are ready to declare the next student program. All students registered in CTE should have a program declared in INow.



