



Fall Forum 2021

Stimulus Funds and UGG, and You and Me, So Happy (Back) Together

# The Most Challenging Issues In Implementing Perkins V

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# Perkins Questions

1. Must Colleges + Districts “expend” their CTE grant by June 30? (or September 30 in the case of Alabama?)

- a) Yes
- b) No



Eligible recipients must “obligate” their grant funds by June 30.

- Tydings – Section 421 (b) of GEPA
- Perkins – Section 133 (b)(1)
- EDGAR- 34 CFR 76.707



States cannot “short-circuit” the 12 month  
“obligation” period by requiring all  
obligations be liquidated by June 30.



- States have 120 days to submit CAR + FSR – Jan 31, 2022
- Locals have 90 days to liquidate obligations, but pass-throughs may shorten

2 CFR 200.344



2. Must the goods and services purchased by the college/district be placed in use by June 30?

- a) Yes
- b) No
- c) Perhaps



In order for a “cost” to be allowable, it must be “allocable.”

2 CFR 200.405



A cost is allocable if it “benefits” the cost objective.

2 CFR 200.405(a)(2)





Although the “benefit” should be documented in the 12-month window, Perkins is a “continuous” program.



# Illustrations:

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- Installing equipment in a lab in June, although students might not benefit until September
- Purchasing curricula/software/licenses which benefit CTE students in future years, as well as the current year



3. May current year funds be used to pay past obligations or future obligations?

- a) Yes
- b) No



Current year appropriations must be used for current obligations.

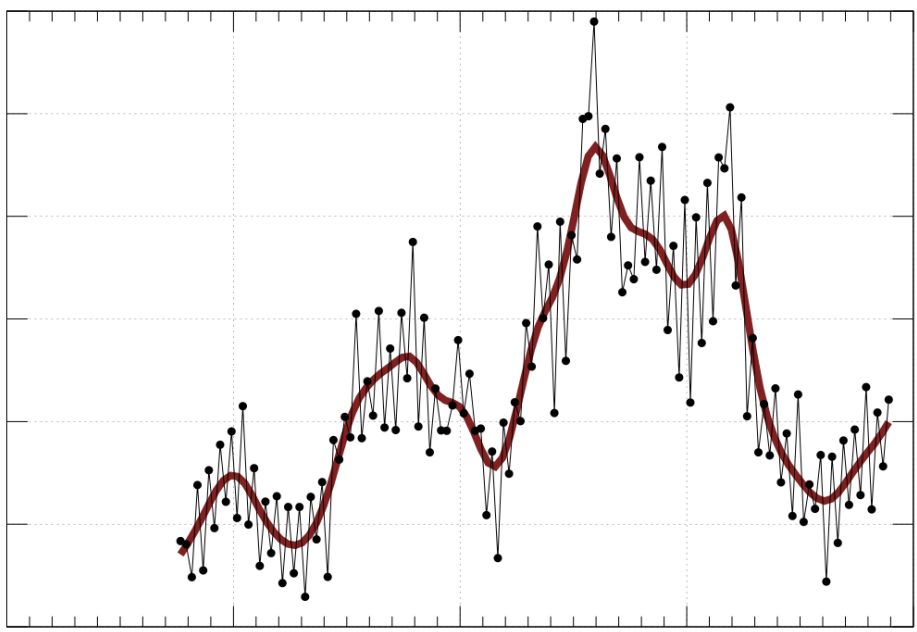
31 USC 1301

31 USC 1553



4. May Perkins funds be used for construction?

- a) Yes
- b) No



5. May Perkins funds be used for capital expenditures?

- a) Yes
- b) No
- c) Only with prior approval



Capital expenditures for equipment are allowable with the prior written approval of ED or the pass-through.

2 CFR 200.439



Trucks, automobiles, mobile or portable trailers for CTE instructional purposes.





6. May Perkins funds direct cash support to CTE students?

- a) Yes
- b) No
- c) Only for special pops



Perkins funds may be used to support out of pocket costs for special pops.

Section 135 (b)(5)(S)



7. If the College or District this year is unable to document a reduction in the performance gap between special pops + nonspecial pops, may the state approve the same budget next year?

- a) Yes
- b) No



If no meaningful progress prior to third year, the eligible recipient “must” take “additional actions” to eliminate the disparities.

Sec. 134 (b)(9) of Perkins



8. May Perkins funds be used to pay for CTSO jackets?

- a) Yes
- b) No



Perkins funds may be used to support CTSOs, including preparation for and participation in technical skills competitions.

Sec. 135 (b)(5)(O)



- Jackets are not a CTE instructional cost
- UGG defines “participant support costs” as direct costs for items, such as travel + registration fees

2 CFR 200.1



9. May Perkins funds support the cost of technical skill assessments?

- a) Yes
- b) No





Perkins funds may support industry-recognized certification exams or other assessments leading toward a recognized postsecondary credential.

Sec. 135 (b)(5)(F)



10. May Perkins funds be used to support tuition costs for faculty/administration to obtain a masters degree?

- a) Yes
- b) No



“Professional Development” Requirements  
in Section 3 (40), Section 135 (b)(2),  
Section 134 (b)(8), do not support such  
tuition costs.



Tuition costs for Summer Internships to “increase the ability of educators providing CTE instruction to stay current with industry standards” are allowable.

Sec. 3 (40)



# Questions?



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