


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

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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

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

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- 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

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

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

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

2 CFR 200.405

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

2 CFR 200.405(a)(2)

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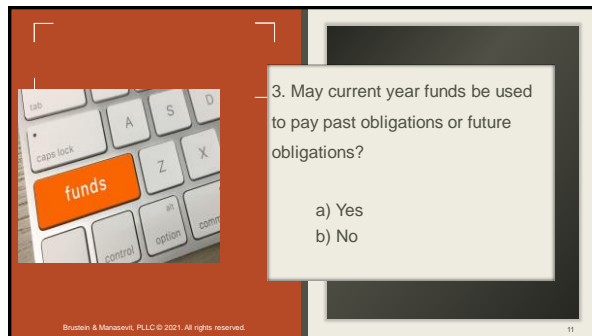
Although the “benefit” should be documented in the 12-month window, Perkins is a “continuous” program.

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Illustrations:

- 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

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


a) Yes
b) No

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Current year appropriations must be used for current obligations.

31 USC 1301
31 USC 1553

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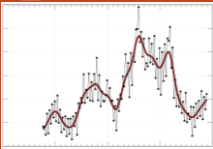


4. May Perkins funds be used for construction?

- a) Yes
- b) No

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5. May Perkins funds be used for capital expenditures?

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

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

2 CFR 200.439

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

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

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

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

Section 135 (b)(5)(S)

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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

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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

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

- a) Yes
- b) No

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

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

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- 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

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

a) Yes
b) No

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

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

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

- a) Yes
- b) No

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

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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)

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Questions?

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