

Version 7.0

Use of Funds:

Q. Can other funds be used to be used to meet the 9 required uses of funds as noted in Section 135 of the Act?

A. The Section 135(b) required activities do not need to be exclusively satisfied through the use of Perkins funds. Local educational agencies and postsecondary institutions may use other funding sources (federal, state, local) to meet the requirements of section 135(b) but must provide sufficient documentation to demonstrate that the requirements have been met before Basic Grants funds are expended on permissive activities.

(Source: Brustein and Krvaric)

Q My secondary CTE program does not have a national certification or state licensure, may I use Perkins funds to support it?

A. As noted in the [State Plan](#) and the Implementation Guide, local secondary recipients (school districts) will have to provide a minimum number of CTE programs (consisting of 3 or more courses leading to fulfillment of the requirements of the Florida Gold Seal Vocational Scholars Award) in order to be eligible to receive Perkins funds. In addition, this minimum number of programs must offer the following:

- Must provide an opportunity for students to become CTE concentrators
- Must provide students with opportunities for acceleration (dual enrollment/articulated credit)
- Must be aligned with business and industry as validated by a local or regional business advisory committee
- Must provide students with the opportunity to earn an industry certification and/or licensure approved by the state
- Must provide students with the opportunity to participate in a CTE program classified as High-Skill, High-Wage, or High-Demand

Your district will be required to offer the required minimum number of CTE programs that meet the above criteria. However, your district would still be permitted to support CTE programs with Perkins funds over and above the minimum number of programs required that **may not** meet the criteria above.

Q May 2007-2008 funds be used to support an event on July 2, 2008?

A. No. 2007-2008 funds may not be used for activities and events that shall take place beyond 06/30/08 (the official end of project date). Pursuant to the guidelines of the DOE 200 Award Notification sent to each eligible recipient, the program and budget year ends on June 30, 2008.

Q. Does Perkins IV require that career and technical education be delivered via the Career Academy model?

A. Perkins IV recognizes the role of the career academy instructional delivery system in career and technical education. Sec. 134(c)(13) states that local eligible recipients may use Perkins funds "to develop and support small, personalized career-themed learning communities." It is a permissive use of funds.

It is important to note that Perkins IV does not mandate that career and technical education be delivered via a career academy instructional delivery system.

Perkins IV represents a historic shift from a vocational education system that prepared a subset of students with narrow job skill preparation to a career and technical education delivery system that prepares all students for college and careers. The new Act places emphasis on preparation for postsecondary education and employment. It eliminates the focus on sub-baccalaureate careers. The expectation in Perkins IV is that students may achieve a degree, certificate or credential and transition from high school to postsecondary education seamlessly.

Q. My district intends to open a secondary Automotive Technology program during program year 2008-2009, does the provision in the RFA apply to new programs?

A. Yes, this provision applies to new programs as well. The provision in the secondary and postsecondary RFA requires Automotive Services Technology education programs comply with Florida Statute 1004.925 which states, *All automotive service technology education programs shall be industry certified by 2007.* Your district must provide documentation of industry certification or evidence that the program is in process of obtaining certification. Automotive Service Technology education programs that are not industry certified or are not in the certification cycle will not be permitted to use Perkins funds to support such programs, unless the funds are used to obtain certification for the program.

Programs that are already NATEF certified may copy their certification letter and certificate and include with the secondary and postsecondary RFA as documentation for this provision. Programs that are "in process" of obtaining NATEF certification may request a letter from NATEF confirming the "in process" status of the program and include with the secondary and postsecondary RFA as documentation for this provision.

Q. May apprenticeship programs be supported with postsecondary Basic Grant funds?

No, Perkins Postsecondary Basic Grant funds may not be used to support apprenticeship programs. While Perkins IV references the term "apprenticeship" in 3 sections of the Act (Section 3(22); Sec. 113(b)(2)B)iv); Section 203(c)(2)(A)), Florida's Perkins IV State Plan does not cite apprenticeship as a postsecondary career and technical education program offering. The State Plan identifies PSAV, ATD, CCC, AS and AAS college credit and clock hour programs as Florida's CTE postsecondary program offerings. Furthermore,

FLDOE does not collect apprentice data for Perkins postsecondary performance measures.

Q. May Perkins funds be used to support a program/service that was supported last year with non-federal funds?

A. Generally, Perkins funds cannot support programs/services previously supported with non-federal funds. *Funds made available under this Act for career and technical education activities shall supplement and shall not supplant, non-federal funds expended to carry out career and technical education activities.* [Perkins IV, Section 311 (a)]

There are instances when a case-by-case evaluation may be required to determine whether federal funds are supplanting or supplementing. Please contact your region's assigned Program Manager in Grants Administration for further review.

Q. Can equipment purchased with Perkins funds be used by non-CTE students?

A. Yes. Equipment purchased with Perkins funds may be used by non-CTE students only if CTE students are not using it during a specified time. For example, if a CTE computer lab is not in use by CTE students for one class period a day, then non-CTE students may use the lab during that time.

Q. My secondary school district offers integrated CTE/academic major areas of interest. Can Perkins funds be used to support academic courses?

A. Perkins funds are only permitted to support the courses and programs in Section 5 of the [Course Code Directory](#) entitled "Career and Technical Education Course and Program Listings." Please note, certain CTE middle school courses and high school practical arts courses are not permitted to be supported with Perkins funds. Please see p. 39 of the [Implementation Guide](#) for more information on courses that are ineligible to be supported with Perkins funds.

Q. May Perkins funds be used to support CTE Dual Enrollment classes? May Perkins funds be used to support academic dual enrollment?

A. Funds may be used to support CTE dual enrollment courses. FLDOE has a mechanism to identify those CTE dual enrolled students for performance measurement purposes. Please see http://www.fldoe.org/workforce/perkins/perkins_resources.asp for the identification list comprised of secondary job preparatory courses and dual enrollment postsecondary course substitutions that will count toward concentrator status. This identification list will also be used to identify secondary participants.

Perkins funds may not be used to support academic dual enrollment courses.

Q May Perkins funds be used to pay for food for an event to recruit local business and industry involvement?

A. No. Please refer to OMB Circular A-87 #18 which states, "The cost of entertainment, including amusement, diversion, and social activities and any costs directly associated with such costs (such as tickets to shows or sports events, meals, lodging, rentals, transportation, and gratuities) are unallowable. It is further stated in OMB Circular A-87 that a fundamental requirement for any use of federal funds is that the cost be "necessary and reasonable for the proper and efficient performance and administration of federal funds."

Programs of Study

Q Is it acceptable to have a list of the Programs of Study approved by the agency heads instead of having them sign a separate articulation agreement for each Program of Study? In other words, if we have one articulation agreement that encompasses a list and attachments of the Programs of Study would that be sufficient? The RFA implies that each Program of Study will have a separate articulation agreement.

A. A written articulation agreement must be in place for each Program of Study that establishes and validates the career pathway. FLDOE will not mandate how many legal articulation agreements it takes to support a Program of Study. Eligible recipients might have one articulation agreement that supports all Program of Studies (POS); or one per program cluster, or one agreement for each Program of Study. As long as the agreement(s), signed by your agency head, describes the opportunities and options for students, that is sufficient.

Q. What is the difference between a "stand-alone" CTE program and a program of study?

A. A program of study incorporates the following elements as described in section 122 of the Act:

- aligns secondary and post-secondary education,
- includes academic & CTE content in a coordinated, non duplicative progression of courses,
- includes the opportunity for secondary students to acquire post-secondary credits,
- and leads to an industry-recognized credential or certificate at the post-secondary level, or an associate or baccalaureate degree.

Agencies will use the model [program of study template](#) to develop their local programs of study.

A stand-alone CTE program does not incorporate the program of study elements in the Act identified above. For example, a CTE program that currently does not directly articulate to a postsecondary program, does not provide for dual enrollment and does not have academic courses that compliment the CTE program.

Career Pathways Consortia

Q How will each consortium actually receive the Career Pathways funds or how are they being released to the fiscal agent?

A. The release of funds by each consortium member to the fiscal agent of the consortium will be detailed in a required MOU or Letter of Agreement or Letter of Understanding between/among partners in the consortium. These MOUs/Agreement letters must be included with the Career Pathways RFA.

The consortium funds will be released (funds are drawn down via an electronic fund transfer) in the form of a contract for services after the agency head for the school district or community college drafts a memo of understanding stating, for example, *"I hereby release 1.5% or \$_____ of the _____ County School District's basic Perkins grant funds to _____ Community College in order to carry out the implementation of Career Pathways Consortia activities."*

Q. Are there any restrictions on the Career Pathways Consortium Chairperson?

A. The designation of Career Pathways Consortium Chairperson is locally determined by each individual consortium and there are no restrictions or limitations.

Accountability and Data Collection

Q. If an eligible recipient is not using Perkins funds to support its career and technical education programs, do the performance indicators have to be reported to FLDOE?

A. Yes. FLDOE must report on all students participating in public career and technical education in the state, both its Perkins-funded and non-Perkins funded career and technical education programs, including those in public charter schools.

Q. On the postsecondary side, how do we identify concentrators and participants?

A. Perkins IV performance measures is not a report that each college submits individually to USDOE. The Florida Department of Education does that for all community colleges, technical centers, and secondary career and technical education. At the Department level, we select career and technical students with the appropriate values in data element 2005 (Program Level) and check the Standard program length with our CIP file, then check either data element 2007 for clock hour programs or 2008 for credit programs to see if 1/3 of the program hours have been completed in the program to determine concentrators.

Q. What is happening with the Tech Prep Data Element?

A. The Tech Prep secondary and postsecondary participant data elements will remain in place as agencies will be required to report Tech Prep participation during 2007-2008. Secondary 2007-2008 Tech Prep Participants will be reported in Survey 5. A new Career Pathways Participant data element will replace Tech Prep Participant for the 2008-09 reporting year. Career Pathways Participant will be reported for secondary with the 2008-09 data in Survey 5 (July – September of 2009).

Postsecondary data reporting for 2007-2008 closed on August 1, 2008. A new Career Pathways Participant data element will replace Tech Prep Participant for the 2008-2008 reporting year. Career Pathways Participant will be reported for postsecondary with the 2008-2009 data in Surveys F (September – October of 2008), W (January – February of 2009), and S (June – July of 2009).

The new Career Pathways data element may be viewed at:
http://www.fldoe.org/eias/dataweb/database_0809/st20_75.pdf

Q Are special diplomas part of 4S1 Secondary Graduation Rate?

A. Special diploma recipients are not included in the 4S1 numerator. Recipients of standard diplomas and GED diplomas obtained through a high school GED exit option are included in the numerator. (They are identified by the following codes: W06, W10, WGD, W43, WFW, WFT, W6A and WFB.)

Q Referring to the Secondary Local Accountability Chart, 1S1 (academic attainment in reading) and 1S2 (academic attainment in math): in both the Numerator and the Denominator, the very last statement states: "*and who left secondary education*". Does this mean the students who were actually graduates of secondary education or does it also include dropouts who were at one time in secondary education?

A. Students who "left" within the context of 1S1 and 1S2 include students reported with the following withdrawal and completion codes:

Withdrawal Reason

DNE = Did not enter as expected for unknown reasons

W05 = Age 16 or over, leaves voluntarily

W13= Court Action

W15= Nonattendance

W18= Medical Reasons

W21= Expelled

W22= Whereabouts unknown

W23= Any other reason than W01-W22 or W22-W24

W25= Under the age of 6

WPO= Subsequent to receiving W07, W08, W8A, W09 or W27

Diploma Type

W06 = Standard High School Diploma

W6A = Standard High School Diploma (College Prep Option)

W6B = Standard High School Diploma (Career Prep Option)

W07 = Special Diploma (option 1)

W10 = Standard High School Diploma (GED and Graduation Test)

W27= Special Diploma (Option 2)

WGD = State of Florida Diploma (GED only)

WFW = Standard High School Diploma (FCAT waiver)

WFT = Standard High School Diploma (Alternate Assessment)

WFA = Standard High School Diploma (College Prep Option and Alternate Assessment)

WFB = Standard High School Diploma (Career Prep Option and Alternate Assessment)

WGA = Standard High School Diploma (GED and Alternate Assessment)

Certificate Type

W08= Certificate of Completion

W8A= Certificate of Completion (all regs except graduation test)

W09= Special Certificate of Completion

Requests for Application/Proposal (General Questions)

R. The Service Delivery Form (located in all Perkins RFAs/RFPs) states “include this form in the Application Package-do not change or modify form.” Is this correct?

A. The instructions on the Service Delivery Service should be taken literally. Applicants must include this form in the Perkins application packages and do not change or modify the form in any way.

Special Populations (Programs and Services)

Q. Can Perkins funds be spent only on special populations if they are enrolled in Career and Technical Education?

- A. Section 2 of the Act requires that activities supported with federal funds benefit “students who elect to enroll in career and technical education programs.” Historically, the U.S. Department of Education has interpreted this provision to permit outreach, recruitment and other informational types of services on career technical education to students, including special population students, which might consider participation in career technical education. (Source: *National Alliance for Partnership in Equity*)

Q. Can Perkins funds be used for remedial educational services for special populations?

- A. Perkins IV redefines career and technical education in Section 3(5) as “organized educational activities that-
- (A) offer a sequence of courses that-
 - (iii) may include prerequisite courses (other than remedial course) that meet the requirements of this subparagraph; and...

However, the legislative history of the Act indicates that funds may be used for supportive services (e.g. transportation, child care, tutoring) that would be necessary for special populations to succeed in the program (See Question #4). Academically disadvantaged students are no longer defined as special populations. (Source: *National Alliance for Partnerships in Equity*)

Q. May Perkins funds be used to provide supportive services (child care, transportation, tuition assistance, books, materials, uniforms and other financial assistance) to special populations who are enrolled in career and technical education?

Yes, although supportive services were not defined or mentioned in Perkins III and are again not defined in Perkins IV, current practice under Perkins III as supported by U.S. Dept. of Education, Office of Vocational and Adult Education Program Memorandum 99-13 (available at <http://www.ed.gov/about/offices/list/ovae/pi/cte/vocnontrad13.html>) is to allow states and locals to determine if Perkins funds are to be spent on supportive services. Many local programs rely on Perkins funds to provide these supportive services to those special population students who are not eligible or able to receive these services through other programs to ensure their full participation in career and technical education.

In addition, Perkins IV under Section 324(b) refers to the use of Perkins funds for student assistance and financial aid and specifically identifies these attendance costs as “(b) Attendance Costs.—The attendance costs described in this subsection are—

- (1) tuition and fees normally assessed a student carrying an academic workload as determined by the institution, and including costs for rental or purchase of any equipment, materials, or supplies required of all students in that course of study; and
- (2) an allowance for books, supplies, transportation, dependent care, and miscellaneous personal expenses for a student attending the institution on at least a half-time basis, as determined by the institution.” (Source: *National Alliance for Partnerships in Equity*)

Other Related Questions:

- Q.** If grant funds are used to purchase equipment, must a Detailed Projected and Purchased Equipment Form be completed and submitted with our application?
- A.** Not necessarily. The purpose of the equipment form is to list equipment that is planned / expected to be purchased with the grant award and to list actual equipment purchased. Many districts and agencies have thorough and comprehensive inventory systems. Evidence of these systems may be submitted with the grant application as a ‘sample’ of the agency’s process to insure that tracking the equipment purchased with the specific grant monies is taking place. In the absence of such a system and evidence thereof, the Detailed Projected and Purchased Equipment Form must be completed and submitted with the application as evidence of tracking equipment.