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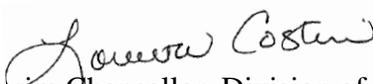
Loretta Costin, Interim Chancellor  
Division of Career and Adult Education



June 4, 2010

## MEMORANDUM

**TO:** Eligible Recipients of Section 131 (Secondary) and Section 132 (Postsecondary) Perkins IV Federal Career and Technical Education Funds Authorized by Public Law 109-270

**FROM:**  Loretta Costin, Interim Chancellor, Division of Career and Adult Education

**SUBJECT:** **Career and Technical Student Organization (CTSO) Expenditures**

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As you may recall, last May the U. S. Department of Education, Office of Vocational and Adult Education (OVAE), issued non-regulatory guidance that included information regarding *Funding for Career and Technical Student Organizations (CTSOs)*. (See pages 12 and 13 of the attachment.) Upon extensive review and consultation with legal advisors, the Division of Career and Adult Education (DCAE) issued a July 13, 2009 memorandum (see attached) delineating the state's policy regarding CTSO expenditures. The July 13 memorandum deemed costs related to travel to CTSO technical skill competitions, as a part of established curriculum, allowable.

During the first week of April 2010, FLDOE was monitored by OVAE. The OVAE monitoring team conducted a comprehensive review of Florida's implementation of Perkins IV. During the review of 2009-2010 local applications, OVAE staff closely examined budget narratives and expenditures related to CTSOs and identified unallowable CTSO costs at the local level.

As a result of the monitoring visit, we have been advised that Florida may be issued a non-compliance finding relative to local CTSO unallowable costs. According to the May 28, 2009 OVAE issued non-regulatory guidance document, "Perkins funds may not be used for lodging,

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feeding, conveying, or furnishing transportation to conventions or other forms of social assemblage.” However, “Perkins funds may be used for these types of direct assistance if the costs are 1) related to a CTSO that is an integral part of the curriculum, and 2) part of a larger program to serve special populations or nontraditional students.”

All local CTSO travel costs must be consistent with the OVAE non-regulatory guidance of meeting both requirements (integral part of the curriculum and part of a program to serve special populations or nontraditional students) before Perkins funds are expended for this purpose at the local level.

The May 28, 2009 non-regulatory guidance document is included for additional reference. We will continue our communications with OVAE regarding this potential finding. If you have any questions, please contact Kathleen Taylor at 850-245-9062 or via e-mail at [kathleen.taylor@fldoe.org](mailto:kathleen.taylor@fldoe.org)

Thank you.

LC/kt

Attachments:

1. CTSO Skill Competitions Expenditures Memorandum, July 13, 2009
2. United States Department of Education Non-Regulatory Guidance