



CARL D. PERKINS



Career and Technical Education Act of 2006

2018 EDITION



TABLE OF CONTENTS

Introduction	4
Overview of the Perkins Grant	4
Framework of the Federal Statute	4
Purpose	4
Definitions	5
Respective Role of State Eligible Agency	12
Perkins Grant Funding	13
Distribution of Funds	13
State Administration	13
State Leadership	13
Designated Eligible Agency	14
Formula for Distribution to Eligible Subrecipients	14
Secondary	14
Post-Secondary	15
State Reserve – Workforce Discovery Grants	15
Perkins IV Basic Grant Application Process	16
Obligation of Funds	17
Funding Timeline	17
Perkins Accountability Requirements	17
State and Local Negotiations	17
Core Indicators of Performance	17
State Levels of Performance	18
Local Levels of Performance	18
Performance Improvement Plans	18
Perkins Annual Reports	19
Perkins Monitoring	20
Local Level Monitoring	20
Business/Industry Partnerships	20
Advisory Committees	20
Requirements	20
Forming an Advisory Committee	21
Nomination of Committee Members	21
How Many Committee Members?	21
Understanding of Responsibility	21
Business/Industry Surveys	22
Requirements	22

TABLE OF CONTENTS

Uses of Perkins Funds	22
Local Uses	22
Administration	22
Indirect Cost Rate	22
Program Activities	23
Required Uses of Funds	23
Permissible Uses of Funds	23
Supplement Not Supplant	24
Local Plans for Perkins Funds	25
Five-Year Plan	25
Federal Cost Principles	25
EDGAR/Uniform Grant Guidance	25
Wyoming's Examples of Allowable & Non Allowable Expenses	26
Specific Items of Cost – SEA	30
Accommodations for Individuals with Disabilities	30
Career and Technical Student Organizations	30
Professional Development Grant	30
Salaries	31
Procurement	31
Methods of Procurement (Purchase)	31
Micro-purchase	31
Small Purchase Procedures	32
Formal Purchases	32
Property Management	33
Types of Property	33
Equipment Standards	34
Condition of Equipment Definitions	35
Inventory Procedure	36
Retention Requirements	36
Other Federal Requirements	37
Text Messaging & Emailing	37

INTRODUCTION

The purpose of this manual is to describe the guidelines for grant allocation, implementation, and oversight for programs administered by the Wyoming Department of Education (WDE) Career and Technical Education (CTE) team. This is meant to be a procedure manual for eligible recipients to comply with state and federal requirements for the Carl D. Perkins Act of 2006.

OVERVIEW OF THE PERKINS GRANT

FRAMEWORK OF THE FEDERAL STATUTE

PURPOSE

The purpose of the 2006 Perkins Act is to develop more fully the academic, career and technical skills of secondary and postsecondary students who elect to enroll in career and technical education programs by:

- Building on the efforts of states and localities to develop challenging academic and technical standards, including preparation for high-skill, high-wage or high-demand occupations in current or emerging professions.
- Promoting the development of services and activities that integrate rigorous and challenging academic and career and technical instruction, and that link secondary and postsecondary education for participating CTE students.
- Increasing state and local flexibility in providing services and activities designed to develop, implement and improve career and technical education, including Tech Prep education.
- Conducting and disseminating national research and disseminating information on best practices that improve CTE programs, services and activities.
- Provide technical assistance that---
 - Promotes leadership, initial preparation, and professional development at the state and local level; and
 - Improves the quality of CTE teachers, faculty, administrators and counselors.
- Supporting partnerships among secondary schools, postsecondary institutions, baccalaureate degree granting institutions, local workforce investment boards, business and industry, and intermediaries.
- 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 U.S. competitive.

DEFINITIONS

5% ADMINISTRATION

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

ARTICULATION AGREEMENT

A written commitment:

- A. That is agreed upon at the state level or approved annually by the lead administrators of a secondary institution and postsecondary educational institution, or an associate degree granting postsecondary educational institution and a baccalaureate degree granting postsecondary educational institution, and;
- B. To a program that is 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 described above.

CAREER AND TECHNICAL EDUCATION

The term 'career and technical education' means organized educational activities that:

- A. Offer a sequence of courses that:
 - 1. Provides individuals with coherent and rigorous content aligned with challenging academic standards and relevant technical knowledge and skills needed to prepare for further education and careers in current or emerging professions;
 - 2. Provides technical skill proficiency, an industry-recognized credential, a certificate, or an associate degree; and
 - 3. May include prerequisite courses (other than a remedial course) that meet the requirements of this subparagraph; and
- B. Include competency-based applied learning that contributes to the academic knowledge, higher-order reasoning and problem-solving skills, work attitudes, general employability skills, technical skills, and occupation-specific skills, and knowledge of all aspects of an industry, including entrepreneurship, of an individual.

CAREER AND TECHNICAL STUDENT ORGANIZATIONS (CTSOS)

These organizations play an important part in preparing young people to become productive citizens and to assume roles of leadership in their communities. These organizations provide a unique program of career and leadership development, motivation, and recognition for secondary and postsecondary students enrolled, or previously enrolled, in career and technical education programs. In Wyoming, state supported organizations include FFA, FBLA, FCCLA, SkillsUSA, and DECA.

CAREER GUIDANCE AND ACADEMIC COUNSELING

The term ‘career guidance and academic counseling’, means guidance and counseling that:

- A. 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; and
- B. Provides information with respect to career options, financial aid, and postsecondary options, including baccalaureate degree programs.

CAREER PATHWAY

Career pathways are designed to bring greater efficiency and transparency to the routes from adult education programs, non-credit training, or other starting points to credentials recognized by industry and postsecondary educational institutions. For more detailed information on career pathways, visit the [CTE website](#).

CIP CODE

The Classification of Instructional Programs provides a taxonomic scheme that supports the accurate tracking and reporting of fields of study and program completions activity. These codes are assigned to CTE programs in order to determine whether or not a program would be considered nontraditional for either gender.

COLLEGE, CAREER, AND MILITARY READY

A well-rounded education includes both success in school and readiness for post-secondary life. Successful students follow a variety of paths that lead to a prosperous and fulfilling adult life. Graduation from high school is imperative. Additionally, students should demonstrate readiness for the next steps in life by achieving proficiency on one or more of the following:

- ACT (college ready)
- Workforce assessment or industry certification (career ready)
- ASVAB (career and/or military ready)

CONCENTRATOR

Secondary - At the secondary level, a CTE concentrator is defined as a secondary student who has completed three or more courses in a CTE program, including those who may be currently enrolled in their third course.

Post-Secondary - At the postsecondary level, a CTE concentrator is defined as a student who (1) completes at least 12 technical or academic credits within a single program area or across multiple CTE program areas, or (2) completes a threshold level in a short-term CTE program of less than 12 credit units that terminates in an industry-recognized credential, certificate or degree.

DISPLACED HOMEMAKER

An individual who:

- A.
 1. Has worked primarily without remuneration to care for a home and a family, and for that reason has diminished skills;
 2. Has been dependent on the income of another family member but is no longer supported by that income; or
 3. Is a parent whose youngest dependent child will become ineligible to receive assistance under part A of title IV of the Social Security Act not later than two years after the date on which the parent applies for assistance under such title; and
- B.
 1. Is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment.

EDGAR OR UNIFORM GRANT GUIDANCE

On December 19, 2014, the U.S. Department of Education released the newly updated Education Department General Administrative Regulations (EDGAR). This change was due to the Office of Management and Budget's (OMB) publication of the final Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. This is a collection of resources that includes all the key documents an administrator needs to run a compliant federal education program.

ELIGIBLE AGENCY

The term 'eligible agency' means a State board designated or created consistent with State law as the sole State agency responsible for the administration of career and technical education in the State or for the supervision of the administration of career and technical education in the State.

ELIGIBLE RECIPIENT

The term 'eligible recipient', means:

- A. A local educational agency (including a public charter school that operates as a local educational agency), an area career and technical education school, an educational service agency or a consortium, eligible to receive assistance under section 131 of the law; or
- B. Eligible institution or consortium of eligible institutions eligible to receive assistance under section 132 of the law.

EXTRA 29% STATE CTE FUNDING

The school foundation funding model provides for funding of Vocational Education (the model specifies vocational education, but terms have slowly been changing to CTE) in two ways:

- A. Additional funding for teachers based on students in grades 9-12 taking CTE courses approved by WDE. Student Voc Ed FTE amount is multiplied by additional 29% weight; the amount is then divided by secondary class size of 21 to derive additional teacher FTE.
- B. Resources for Voc Ed equipment and supplies are based on an additional amount per teacher FTE. For each Voc Ed teacher FTE, \$9,361.46 is provided for equipment, supplies and equipment replacement.

FAUPL (FINAL AGREED-UPON PERFORMANCE LEVELS)

The term used to denote the performance levels for the Core Indicators of Performance. These would include 1S1, 1S2, 2S1, 3S1, 4S1, 5S1, 6S1 and 6S2 for secondary; 1P1, 2P1, 3P1, 4P1, 5P1 and 5P2 for post-secondary. Refer to Attachment A for more details.

LOCAL EDUCATIONAL AGENCY

As defined in ESEA, a public board of education or other public authority legally constituted within a State for either administrative control or direction of, or to perform a service function for, public elementary schools or secondary schools in a city, county, township, school district, or other political subdivision of a State, or for a combination of school districts or counties that is recognized in a State as an administrative agency for its public elementary schools or secondary schools.

LOCAL NEGOTIATIONS

This is the process of negotiating performance targets for each of the Core Indicators of Performance. This process occurs as an exchange between WDE CTE staff and LEA/IHE staff annually in early spring for the current program year.

NONTRADITIONAL FIELDS

Occupations of fields of work, including careers in computer science, technology, and other 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.

NOCTI ASSESSMENTS

Each school district (LEA) that accepts Perkins funding must measure technical skill attainment by administering technical skills assessments to CTE concentrators. The WDE provides access to technical skills assessments via NOCTI, or districts have the option of administering industry certificate/credential assessments (e.g. CNA) to concentrators. The industry certificate/credential assessments may or may not be delivered through the NOCTI system, and are typically not paid for by the WDE. Visit nocti.org for more information.

NOCTI SITE COORDINATOR

Each school district and college that accepts Perkins funding must establish a local NOCTI Site Coordinator as a primary contact for Perkins CTE assessment administration. Visit nocti.org for more information.

PARTICIPANT

Secondary - At the secondary level, a CTE Participant is defined as a secondary student who has completed one or more courses in a CTE program sequence.

Post-Secondary - At the postsecondary level, a CTE Participant is defined as a student who has earned one or more credits in any CTE program area.

PERFORMANCE IMPROVEMENT PLAN

For any of the district or college performance targets that are not met at the **90% threshold or above** (90% of the negotiated target for any of the Core Indicators of Performance), one of these must be submitted to the WDE. It must include a detailed plan to improve performance for each of the indicators not met. These are submitted to the WDE in March.

PERKINS/CTE COORDINATOR

Each school district and college that accepts Perkins funding must establish a local Perkins/CTE Coordinator as a primary contact for Perkins accountability, general grant management, data collection and reporting, and other Perkins-related duties.

PROGRAM OF STUDY (POS)

A comprehensive, structured approach for delivering academic and career and technical education to prepare students for postsecondary education and career success that is of appropriate size, scope, and quality. Programs of Study must include the following:

- A. Secondary and post-secondary education elements;
- B. Coherent and rigorous content aligned with challenging academic standards and relevant CTE content in a coordinated, non-duplicative progression of courses that align secondary and post-secondary education;
- C. Opportunity for secondary students to gain post-secondary education credits through dual or concurrent enrollment programs or other means; and
- D. Lead to industry-recognized credentials or certificates at the post-secondary level or an associate or baccalaureate degree.

SCED CODE

School Courses for the Exchange of Data - a voluntary, common classification system for secondary school courses. Classification is based on a five-digit Course Code that provides a basic structure for classifying course content. Additional elements and attributes provide descriptive information about each course. These must be submitted to the WDE each year in the 638 Collection, and are required for the additional 29% state CTE funding.

SIZE, SCOPE, AND QUALITY

Local plans shall provide assurances that the eligible recipient will provide a CTE program that is of such size, scope and quality to bring about improvement in CTE programs [Section 134(b)(6)]. Perkins funds are intended to support or assist in developing programs of the following size, scope and quality:

Size - Evaluation of Size encompasses several areas:

- Space
 - Is the program large enough to support regional enrollments?
 - Is there a classroom?
 - Are there lab/shop facilities?
 - Are these spaces large enough to meet the requirements of the program?
 - Are these spaces accessible for students with special needs?
- Equipment
 - Does the program possess all equipment required for adequate instruction?
 - Does the program equipment meet up-to-date industry standards?
 - Is equipment maintenance provided regularly to ensure compliance with industry safety standards?

- Technology
 - Are students instructed in the use and application of program-related technology?
 - Is technology used effectively for maximum student benefit?
 - Are students exposed to and familiar with the use of technology in the workplace as well as in the classroom/lab setting?
 - Is technology used to accommodate distance learning when possible?

Scope - Evaluation of Scope includes the following:

- Include a Program of Study containing a coherent sequence of courses [Perkins Act of 2006 Sections 3(5), 122(c)(1)(A), and 134(b)(3)];
- Secondary programs must align with one of the 16 career clusters adopted by the state of Wyoming, as well as one of the 62 nationally recognized CTE Pathways;
- Post-secondary programs must align with one of the 16 career clusters adopted by the state of Wyoming, as well as one of the 62 nationally recognized CTE Pathways, and result in a CTE Associate Degree, credential, certificate, or lead to industry certifications.

Quality – Evaluation of program Quality includes the following:

- Incorporate Wyoming Career and Vocational Education Standards most recently approved by the State Board of Vocational Education and the governor (secondary) and/or national and global industry standards set forth by credentialing authorities or professional organizations aligned to the respective content areas;
- Courses must include rigorous, coherent CTE content aligned with challenging academic standards;
- Course sequences for Perkins may include no more than one academic or non-CTE course (e.g. Construction Trades I, Construction Trades II, Construction Trades III, and Geometry)
- Articulation agreements or Memorandums of Understanding (MOUs) must exist between the secondary and post-secondary entities, or between two-year and four-year post-secondary institutions, that serve as formal documentation of the alignment of programs;
- Documentation of meaningful collaboration between LEA/IHE and business and industry;
- Incorporation of technical skills assessments and/or procedures to evaluate student proficiency in CTE programs;
- Programs that lead to credentials, certificates or degrees;
- Intentional facilitation of academic and career development for students that aligns with the National Career Development Association’s best practices; and
- Support administrators, teachers, faculty, and instructors with sustained, intensive and focused professional development opportunities to foster program of study design, implementation and maintenance as well as innovative teaching and learning strategies.

SPECIAL POPULATIONS

Special populations include the following:

- Individuals with disabilities;
- Individuals from economically disadvantaged families, including foster children;
- Individuals preparing for non-traditional fields;
- Single parents, including single pregnant women;
- Displaced homemakers;
- Individuals with other barriers to educational achievement;
- Individuals with limited English proficiency.

SUPPLEMENT, NOT SUPPLANT

Perkins funds shall supplement, and not supplant, non-federal funds expended for vocational and technical education. [Section 311 (a)]

It will be presumed that supplanting has occurred where:

- A. A recipient uses Perkins funds to provide services that the recipient is required to make available under another federal, state or local law; or
- B. A recipient uses Perkins funds to provide services that the recipient provided with non-Perkins funds in the prior year; or
- C. A recipient provides services for non CTE students with non-federal funds, and provides the same services to CTE students using Perkins funds.

“Supplement” means to “add to” and “supplant” means to “replace”. Federal law prohibits grant recipients of federal funds from replacing state, local, or district funds with federal funds.

SUPPORT SERVICES

The term ‘support services’ means services related to curriculum modification, equipment modification, classroom modification, support personnel, and instructional aids and devices.

RESPECTIVE ROLE OF STATE ELIGIBLE AGENCY

The responsibilities of an eligible agency under this title shall include:

- A. Coordination of the development, submission, and implementation of the State plan, and the evaluation of the program, services, and activities assisted under this title, including preparation for non-traditional fields;

- B. Consultation with the Governor and appropriate agencies, groups, and individuals including parents, students, teachers, teacher and faculty preparation programs, representatives of businesses (including small businesses), labor organizations, eligible recipients, State and local officials, and local program administrators, involved in the planning, administration, evaluation, and coordination of programs funded under this title;
- C. Convening and meeting as an eligible agency (consistent with State law and procedure for the conduct of such meetings) at such time as the eligible agency determines necessary to carry out the eligible agency's responsibilities under this title, but not less than 4 times annually; and
- D. The adoption of such procedures as the eligible agency considers necessary to:
 1. Implement State level coordination with the activities undertaken by the state boards under section 111 of Public Law 105-220; and
 2. Make available to the service delivery system under section 121 of Public Law 105-220 within the State a listing of all school dropouts, postsecondary education, and adult programs assisted under this title.

PERKINS GRANT FUNDING

DISTRIBUTION OF FUNDS

STATE ADMINISTRATION

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

Not more than 5 percent (or \$250,000, whichever is greater) of the grant is reserved for state administration, which may be used for developing the state plan, reviewing local plans, monitoring and evaluating program effectiveness, assuring compliance with federal laws, and providing technical assistance. In Wyoming, \$250,000 is reserved for state administration of the Perkins grant.

State Administration funds must be matched from non-federal sources.

STATE LEADERSHIP

Perkins allows up to 10 percent of the state allotment to be used to implement the required and permissive state leadership activities described in Section 124 of the law. According to the Perkins law, the following two requirements must be met:

- A. An amount equal to not more than 1 percent of the state allotment shall be available to serve individuals in state institutions; and
- B. Not less than \$60,000 and not more than \$150,000 of state leadership funds shall be available for services that prepare individuals for nontraditional employment.

DESIGNATED ELIGIBLE AGENCY

The Wyoming State Board of Vocational Education is the designated eligible agency responsible for the administration of the Carl D. Perkins Career and Technical Education Improvement Act, and the WDE is the fiscal agent for Perkins IV funding to the state of Wyoming. The WDE Career Technical Education team is responsible for managing the day-to-day operations of grant and subgrant supported activities to assure compliance with applicable Federal requirements and that performance goals are being achieved.

FORMULA FOR DISTRIBUTION TO ELIGIBLE SUBRECIPIENTS

The WDE distributes Perkins IV funds according to the guidance provided in Section 112(a) (1) of the law. According to the federal act and the approved Wyoming State Plan for Career Technical Education the following formula is used for Perkins allocations to eligible subrecipients:

The state of Wyoming receives \$4,214,921.00 annually in Perkins funding.

- **15%** of the total state allocation is set aside for State Leadership and Administration.
- **85%** of the total state allocation is factored into the formula for local distribution (flow-through funds), which is approximately \$3,582,683.00.
- **60%** of the local flow-through funds is allocated to secondary programs, **40%** is allocated to post-secondary programs.
- **10%** of this 85% for local distribution (or 8.5% of the total state allotment) may be put into a State Reserve for distribution to local eligible recipients as determined by the state. In Wyoming, they may be made available to CTE programs in rural areas - based on the [USDA's definition of rural](#).

SECONDARY

- **30%** of the total allocation to local education agencies (LEAs) is based on the number of 5 to 17 year olds who reside in the school district.
- **70%** of the total allocation to local education agencies (LEAs) is based on the number of 5- to 17-year-olds in families who reside in the school district and are below the poverty line, based on data collected under ESEA [Section 131(a)].
- **Improvement** - The WDE will create a template for LEA districts receiving less than \$15,000 that cannot participate in a consortium to request a waiver from the state. This waiver request process will be put into place for the 2017-18 program year. This waiver request will provide an LEA the opportunity to demonstrate that it is located in a rural, sparsely populated area

and explain why it is unable to enter into a consortium. The LEA will also be required to assure WDE that its program will be of sufficient size, scope, and quality.

POST-SECONDARY

- **100%** of the allocation to post-secondary institutions is based on the number of Pell Grant and BIA assistance recipients enrolled in career and technical education programs [Section 132(a)(2)] PART C: 3.1 and 8.1.
- Post-secondary institutions use the below listed methodology to take the count. They are asked to complete and return a signed certification form to the Wyoming Department of Education by no later than April xx, 2018.
 1. Run a query in the WY Community College Commission's Central Station Instance (CSI) of CTE students at the institution who received Pell and/or Bureau of Indian Affairs (BIA) funding for the following semesters (see query logic attached):
 - a. Summer 2017
 - b. Fall 2017
 - c. Spring 2018
 2. CIP codes utilized in the query will be reflective of the parameters established in the Wyoming CIP Code/Career Cluster Crosswalk. Count the entire list of students returned in your query results, ensuring no duplications and that all students were recipients of > \$0 in Pell or BIA funding.
 3. Enter the number of CTE Pell/BIA recipients on the certification form. The College President and Financial Aid Director both need to sign the form certifying the Pell/BIA count.

STATE RESERVE – WORKFORCE DISCOVERY GRANTS

If any Basic Perkins Grant funds are not expended at the local level within the program year (July 1 to September 30 of the following year) for which they are provided, these funds must be returned to the state. Starting in the 2017-18 program year, these returned funds will no longer be re-allocated to eligible subrecipients using the allocation formula from previous years. Returned funds will be placed in a state reserve fund, and re-distributed to eligible sub-recipients utilizing a competitive Workforce Discovery Grant application process.

From the amounts made available under subsection (a)(1) to carry out this subsection, an eligible agency may award grants to eligible recipients for career and technical education activities described in section 135 in:

- (1) rural areas;
- (2) areas with high percentages of career and technical education students; and
- (3) areas with high numbers of career and technical education students.

This competitive grant may be used to support innovative CTE initiatives at the secondary and post-secondary levels, specifically those that do the following: 1) develop more comprehensive and robust career pathways leading to viable career or post-secondary training options for students; 2) provide work-based learning experiences for students that are in industries closely related to CTE pathways; 3) develop meaningful partnerships between schools/institutions and business/industry representatives. In order to be eligible for the grant, both secondary and post-secondary applicants must have at least one formal partnership established with business or industry (this may include a registered apprenticeship). The grant may not be used to pay for food and/or beverages or any other unallowable uses of funds under the Carl D. Perkins Act of 2006. Applications will be reviewed and scored by a grant review committee at the WDE, and amounts awarded will be equal to or less than \$12,000.00 each.

The grant application will be open for submission between mid-October and mid-December of each program year. Funds will be awarded in early January.

PERKINS IV BASIC GRANT APPLICATION PROCESS

The Perkins grant application is completed annually by eligible subrecipients. It is submitted through the MTW Grants Management System (GMS). All applications submitted are reviewed by WDE Career Technical Education Perkins program managers to determine eligibility. All federal and state program assurances must be initialed and dated in order for the application to be approved. For Wyoming GMS, click [HERE](#).

A Carl D. Perkins Participation Notice for Perkins IV funds for the upcoming program year will be sent out mid-March to eligible LEAs. Similarly, a Pell count notification will be sent in mid-March to IHEs. Following receipt of the IHEs Pell counts, the WDE will send Perkins Participation notices to the IHEs, which will typically happen in early April. The acknowledgement to participate in Perkins funding and activities signifies accepting the deadline to apply for the funds. The Perkins grant application is due to the WDE by June 30 of each year. For example, the grant application for the 2017-2018 program year must be submitted to the WDE via GMS by June 30, 2017.

Any eligible recipient failing to meet the June 30 deadline for submission of grant applications may not qualify for funding.

The Perkins grant application should include detailed and updated information about program year goals and intended uses of funds. The course sequences, clusters, and SCED codes should line up exactly with the respective eligible recipient's Perkins Five-Year Plan and WyCTE Collection pathways (entered for data collection purposes).

If funds are budgeted in the 100- or 200-series on the grant application, the “Staff” tab will need to be completed under Program Detail. If funds are budgeted in the 500-series, be sure to include location of the equipment in the appropriate field. For funds budgeted in any other series, please put N/A for equipment location. For all series, please enter accurate and concise narratives in the “Description” and “Justification” fields.

OBLIGATION OF FUNDS

Funds cannot be obligated until the Perkins grant application is “substantially approvable” by the WDE. When the Perkins grant application is reviewed and either approved or rejected by the WDE. Once approved, changes in project budget, goal(s), objective(s) or activities will require a formal amendment submitted electronically on the respective program year application in GMS. *Budget changes of less than 10% of the grant total do not require a formal amendment.*

FUNDING TIMELINE

Perkins IV addresses the period of time to which an eligible recipient must expend all of the amount allocated in any given program year under sections 131 or 132. Any unexpended funds shall be returned to the eligible agency for reallocation, or to be put in the state reserve. Funds must be obligated within a program year, or the period of time during which the State of Wyoming operates its CTE programs. A program year is defined as a period of time beginning July 1 and ending on June 30 within a single 12-month period. Liquidation of the funds may occur after the end of the program year, making the funds available to eligible recipients for a total period of 15 months. **It is strongly recommended, though, that funds be expended by June 30.** For example, payments made for salaries and benefits should end on June 30, and start out of the new program year budget on July 1 of each program year. *The cutoff date for final cash requests submitted through GMS can always be expected to land around September 20 to allow time for processing.*

PERKINS ACCOUNTABILITY REQUIREMENTS

STATE AND LOCAL NEGOTIATIONS

CORE INDICATORS OF PERFORMANCE

Perkins IV established a state and local performance accountability system designed to assess the effectiveness of the state and local funding recipients in achieving progress in CTE.

STATE LEVELS OF PERFORMANCE

In general, each eligible agency, with input from eligible recipients, shall establish in the State plan levels of performance for each of the core indicators of performance for career and technical education activities authorized under this title. The levels of performance established shall at a minimum:

- A. Be expressed in a percentage or numerical form, so as to be objective, quantifiable, and measureable; and
- B. Require the State to continually make progress toward improving the performance of career and technical education students.

The WDE and OCTAE Regional Accountability Specialist assigned to Wyoming negotiate the levels of performance for each of the secondary and postsecondary core indicators of performance annually. For a specific list of secondary and postsecondary core indicators of performance, along with calculation procedures for each indicator click [HERE](#).

LOCAL LEVELS OF PERFORMANCE

In general, each eligible recipient shall agree to accept the State adjusted levels of performance established in the State plan as local adjusted levels of performance (targets), or negotiate with the WDE CTE Team to reach agreements on new local adjusted levels of performance for each of the core indicator of performance.

PERFORMANCE IMPROVEMENT PLANS

If a local recipient fails to meet at least 90 percent of an agreed upon local adjusted level of performance for any of the core indicators, the local recipient shall develop and implement a performance improvement plan in consultation with various groups (with special consideration to performance gaps between subgroups) during the first program year succeeding the program year for which the local recipient failed to meet the performance level. Templates for performance improvement plans can be found [HERE](#).

The state will work with the local recipient to implement improvement activities.

After providing notice and opportunity for a hearing, the state may withhold all or a portion of the local recipient's funding if:

- A. The recipient fails to implement an improvement plan;
- B. The recipient fails to make any improvement in meeting performance levels within the first program year of implementation of the improvement plan;
- C. The recipient fails to meet at least 90 percent of an agreed upon adjusted level of performance for three consecutive years.

Sanctions may be waived due to exceptional or uncontrollable circumstances, or based on the small size of school or college.

PERKINS ANNUAL REPORTS

The Perkins Annual Report is a summary of activities, supported by Perkins funding, completed during the fiscal year. The report will be submitted in GMS as an amendment to the original application on the End-of-Year Report tab. The report must be submitted to the WDE by the middle of January for the program year that ended June 30th of the prior year. For example, the Annual Report for program year 2016-2017 would be submitted in January 2018. Areas required to be addressed in the report are:

- A. Executive Summary - summarize CTE activities completed and overview of the total program impact;
- B. Activities of the Advisory Committee - outline activities of the advisory committee and partners, including their role in developing programs and completing activities as outlined in the grant approved for the district or college (include advisory committee meeting dates and business/industry survey results);
- C. CTE Program Activities - describe CTE activities completed during the program year in detail, including program accomplishments;
- D. Disaggregated Data - identify any disparities or gaps in performance among all students and disaggregated categories of students. Describe proposed strategies for addressing each of the identified disparities or gaps;
- E. Sustainability and Recommendations - based on fiscal and resource considerations for the program year and future years, identify how the project will be sustained and make recommendations for future activities to be completed.

These reports are reviewed by the WDE CTE program managers for approval. The approval process occurs in GMS as an approval or disapproval of the amendment submitted. Reports may be disapproved and sent back via GMS for corrections if there is insufficient or incorrect information provided. Colleges and districts will have an opportunity to correct the report and resubmit for final approval.

Information from these reports will be summarized and shared with WDE leadership as a snapshot of subrecipient activities and initiatives.

PERKINS MONITORING

LOCAL LEVEL MONITORING

All programs funded under the Carl D. Perkins Act of 2006 shall be monitored for the purposes of compliance, program improvement and financial review. Monitoring for secondary subrecipients of Perkins occurs in conjunction with Consolidated Grant monitoring, and is coordinated through the WDE Federal Programs team. Monitoring for post-secondary subrecipients of Perkins is coordinated by the Perkins program managers independent of secondary monitoring.

Detailed monitoring processes, timelines, and a flowchart can be found in the [WDE LEA/IHE Monitoring Process document](#).

BUSINESS/INDUSTRY PARTNERSHIPS

ADVISORY COMMITTEES

REQUIREMENTS

The state of Wyoming requires that each subrecipient of Perkins funds establishes and maintains a local CTE advisory committee made up of:

Secondary: 2-5 business/industry employers, 2-5 CTE students, 2-6 CTE instructors, 1-3 parents, a private/home school representative, and a school counselor.

Post-secondary: 2-5 business/industry employers, 2-5 CTE students, 2-6 CTE instructors, a student advisor, and a college career counselor/facilitator.

The advisory committees may be content specific (individual committees for each career cluster or program area), or may consist of representatives from multiple content areas. It is required that the advisory committee meet twice per program year - once in the fall, and once in the spring. Subrecipients must keep adequate documentation of meetings, including minutes, sign-in sheets, agendas, and other relevant documentation. An excellent toolkit for advisory committee meetings can be found [HERE](#).

FORMING AN ADVISORY COMMITTEE

NOMINATION OF COMMITTEE MEMBERS

- Nominations should be recommended by the head of the career technical education (CTE) department(s) with input from the other CTE teachers and district/college leadership.
- The advisory committee should be truly representative of the district or college and CTE program(s).
- Committee members should be representative of the various industry sector programs offered and include: parents, students, academic and CTE teachers, faculty, administrators, career guidance and academic counselors, representatives of business and industry, labor organizations, and representatives of special populations.
- Members must have recent, firsthand, and practical experience and must be individual/s engaged or working in an industry sector offered by the district or college.
- Members should exhibit substantial interest in the CTE program(s).
- Members should be sought as public-spirited individuals who understand a specialized area and are willing to contribute their knowledge and advice as a member of a cooperative, constructive group.
- Members should recognize the time required and express a willingness to serve on the committee.

HOW MANY COMMITTEE MEMBERS?

- There is no fixed number that will satisfy all situations.
- The group needs to be large enough to be representative of the district or college and to provide a quorum if several members are absent.
- The group should not be so large that it is unwieldy or difficult to call together.
- The committee should represent parity (an equal number of representatives) between all groups involved. There should never be more district or college staff than representatives of business/industry/labor.

UNDERSTANDING OF RESPONSIBILITY

- Of greatest importance is that the committee is only advisory in nature.
- The committee has no administrative or policy forming power.
- The committee will make suggestions and/or recommendations on policy and procedure, but the source of its influence is in the voluntary acceptance of this advice by the proper governing authority.

BUSINESS/INDUSTRY SURVEYS

REQUIREMENTS

Section 135-2 of the Perkins Act of 2006 requires that the employment needs of the region are considered in the planning of CTE programs. The State of Wyoming requires that all Perkins subrecipients survey local businesses and industries annually. A copy of the survey, as well as survey results, must be provided to the WDE during grant monitoring. There are multiple formats and deployment methods that can be used, and the questions asked can be unique to each district/college. A great example of how to develop a business/industry survey can be found [HERE](#) (Page 9).

USES OF PERKINS FUNDS

LOCAL USES

ADMINISTRATION

Each local recipient receiving funds under Perkins may not use more than five percent for administrative purposes. This may include salaries for staff members responsible for administration of the Perkins grant at the local level. This balance of the funds must be used to improve CTE programs as described below.

INDIRECT COST RATE

The Perkins IV Act establishes a limitation on administrative costs, which are inclusive of allowable indirect costs. Therefore, indirect costs cannot exceed the five percent administrative cap for Perkins, and the five percent limitation applies to both (combined) direct administration and indirect costs. This is the case even if a college or district has negotiated a restricted indirect rate with the State that exceeds the five percent cap. The following is an example of how indirect can be calculated:

Total Perkins Allocation:	\$50,000.00
Administrative Cost Limitation at 5%:	\$2,500.00
Direct Program Administrative Cost Incurred:	\$1,700.00
Allowable Indirect Cost Reimbursement:	\$800.00
TOTAL Administrative Cost Reimbursement:	\$2,500.00

PROGRAM ACTIVITIES*REQUIRED USES OF FUNDS*

- A. Strengthen the academic and career and technical skills of students participating in CTE programs through the integration of academics with CTE programs.
- B. Link CTE at the secondary level and the postsecondary level, including by offering the relevant elements of not less than one program of study.
- C. Provide students with strong experience in and understanding of all aspects of an industry which may include work-based learning experiences.
- D. Develop, improve, or expand the use of technology; and provide students with the skills needed to enter a technical field, and encourage schools to collaborate with technology industries to offer internships and mentoring programs.
- E. Provide in-service and pre-service professional development programs to teacher, faculty, administrators, and career guidance and academic counselors who are involved in integrated CTE programs, on topics including effective integration of academics and CTE, effective teaching skills based on research, effective practices to improve parental and community involvement, effective use of scientifically based research and data to improve instruction. Professional development should also ensure that teachers and personnel stay current with all aspects of an industry, involve internship programs that provide relevant business experience, and train teachers in the effective use and application of technology.
- F. Develop and implement evaluations of the CTE programs carried out with Perkins funds, including an assessment of how the needs of special populations are being met.
- G. Initiate, improve, expand and modernize quality CTE programs, including relevant technology.
- H. Provide services and activities that are of sufficient size, scope and quality to be effective.
- I. Provide activities to prepare special populations, including single parents and displaced homemakers who are enrolled in CTE programs, for high-skill, high-wage or high-demand occupations that will lead to self-sufficiency.

PERMISSIBLE USES OF FUNDS

- A. Involving parents, business and labor organizations, in the design, implementation and evaluation of CTE programs.
- B. Providing career guidance and academic counseling, which may include information described in Section 118, for students participating in CTE programs that improve graduation rates and provide information on postsecondary and career options, and provide assistance for postsecondary students and adults.
- C. Local education and business partnerships, including for work- related experiences for students, adjunct faculty arrangements for qualified industry professionals and industry experience for teachers and faculty.
- D. Providing programs for special populations.
- E. Assisting career and technical student organizations.
- F. Mentoring and supportive services.

- G. Leasing, purchasing, upgrading or adapting equipment, including instructional aids and publications (including support for library resources) designed to strengthen and support academic and technical skill achievement.
- H. Teacher preparation programs that address the integration of academic and CTE courses, and that assist individuals who are interested in becoming CTE teachers and faculty, including individuals with experience in business and industry.
- I. Developing and expanding postsecondary program offerings at times and in formats that are accessible for all students, including through the use of distance learning.
- J. Developing initiatives that facilitate the transition of sub-baccalaureate career and technical education students into baccalaureate degree programs, including articulation agreements; dual enrollment programs, academic and financial aid counseling, and other initiatives to overcome barriers and encourage enrollment and completion.
- K. Providing activities to support entrepreneurship education and training.
- L. Improving or developing new CTE courses, including the development of programs of study for consideration by the state and courses that prepare individuals academically and technically for high-skill, high-wage, or high-demand occupations and dual or concurrent enrollment opportunities.
- M. Developing and supporting small, personalized career-themed learning communities.
- N. Providing support for family and consumer sciences programs.
- O. Providing CTE programs for adults and school dropouts to complete secondary education or upgrade technical skills.
- P. Providing assistance to individuals who have participated in services and activities under this Act in continuing their education or training or finding an appropriate job.
- Q. Supporting training and activities (such as mentoring and outreach) in nontraditional fields.
- R. Providing support for training programs in automotive technologies.
- S. Pooling a portion of such funds with a portion of funds available to other recipients for innovative initiatives.
- T. Supporting other CTE activities consistent with the purpose of the Act.

SUPPLEMENT NOT SUPPLANT

Perkins funds shall supplement, and not supplant, non-federal funds expended for CTE programs. This includes funds disbursed at the state level and at the local level. Expenditure reports and ledgers will be reviewed during state monitoring of local programs in order to ensure that Perkins funds are supplementing, not supplanting, non-federal funds.

LOCAL PLANS FOR PERKINS FUNDS

FIVE-YEAR PLAN

Each eligible recipient needs to submit a local plan in order to qualify to receive Perkins funds. The plan must cover a five-year time period. Starting with the 2017-2018 Perkins Grant Application in GMS, the WDE will grant eligible recipients the flexibility every year to update their five-year plan within the Program Detail/Uses of Funds/Local Plan section of the application.

FEDERAL COST PRINCIPLES

EDGAR/UNIFORM GRANT GUIDANCE

The non-federal entity must establish and maintain effective internal control over the federal award that provides reasonable assurance that the non-federal entity is managing the federal award in compliance with federal statutes, regulations, and the terms and conditions of the federal award. The factors affecting the allocability of costs are outlined in EDGAR. The general principles in EDGAR state that for costs to be allowable they must be:

- **Reasonable and necessary** meaning that, for example, sound business practices were followed, and purchases were comparable to market prices;
 - A cost is reasonable if, in its nature and the amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost.
- **Allocable to the federal award** meaning that the federal grant program, in this case Perkins, derives a benefit in proportion to the funds charged to the program – for example if 50 percent of an instructor’s salary is paid with Perkins funds, then the instructor must spend at least 50 percent of his or her time on Perkins program activities;
- **Legal under state and local law**;
- **Are properly documented** and accounted for on a consistent basis with generally accepted accounting principles;
- **Consistent with the provisions of the grant program**; and
- **Not used for cost-sharing or matching any other grants agreement.**

WYOMING'S EXAMPLES OF ALLOWABLE & NON ALLOWABLE EXPENSES

USE	ALLOWABLE & NON-ALLOWABLE EXPENSES
<p>Equipment: defined as “an article of nonexpendable, tangible personal property having a useful life of more than one year.” Equipment must be “allowable” and used to improve students’ performance.</p>	<p>Allowable Expense</p> <ul style="list-style-type: none"> • Equipment that will be used by students enrolled in CTE Programs. <ul style="list-style-type: none"> ○ Equipment must be purchased early enough in the school year to enable an increase in student performance during the program year purchased. • Equipment that will be utilized in instructing students in CTE Programs. <ul style="list-style-type: none"> ○ LEAs/IHEs may lease, purchase, and upgrade equipment (including instructional aides). ○ LEAs/IHEs may pay the cost to maintain equipment purchased with Perkins IV funds as long as the expenditures adhere to the budget guidance. ○ The subrecipient must inventory any equipment purchased with Perkins IV funds. • Inventory documentations should be kept on file and made available upon request. Inventory documentation must follow the federal guidelines set forth in EDGAR (2 CFR 200.313(d)(1-5)). • Equipment must be removed from the inventory records if the program is no longer active; proper disposal guidelines must be followed (EDGAR 2 CFR 200.313(e)(1-4)). <p>Non-Allowable Expense</p> <ul style="list-style-type: none"> • Motorized and Non-Motorized Vehicles (e.g. trucks, trailers, tractors, etc.) <ul style="list-style-type: none"> ○ This is generally unallowable unless the subrecipient can provide documentation that shows the vehicle will be used solely for educational purposes supporting CTE programs that align with Five-Year Plan and Perkins Grant Application. • Replacement of equipment that were originally purchased with non-federal funds <ul style="list-style-type: none"> ○ This would be considered supplanting if the subrecipient cannot provide adequate documentation showing an upgrade in technology or general function of the replacement. • Infrastructure supporting installation of equipment, for example, an exhaust system for a paint booth.
<p>Academic Integration</p>	<p>Allowable Expense</p> <p>Expenses directly related to academic integration tied to Perkins Core Indicators (i.e., Math in CTE).</p>

USE	ALLOWABLE & NON-ALLOWABLE EXPENSES
Supplies	<p>Allowable Expense</p> <ul style="list-style-type: none"> • Costs incurred for materials, supplies and fabricated parts necessary to carry out a CTE course activity. • Computers and computing devices. <p>Non-Allowable Expense Consumable supplies to be made into products to be used personally by students, teachers, or other persons. Consumable supplies are any supplies with a shelf life.</p>
Technical Skill Attainment	<p>Allowable Expense</p> <ul style="list-style-type: none"> • The cost of assessments associated with end-of- program assessments not covered by the WDE (e.g. some industry certifications). Local funds may also be used to support this activity. • The cost of teacher prep packs and study guides to support preparation for end-of-program assessments.
Education and Business Partnerships & Collaborations	<p>Allowable Expenses</p> <ul style="list-style-type: none"> • The cost associated with: <ul style="list-style-type: none"> ○ nvolving parents, businesses, and labor organizations as appropriate (all subrecipients are required to have an active advisory committee; these committees may be shared between programs). ○ For local education and business partnerships; • Providing summer internships for teachers/faculty/counselors/administration (participants may not receive a stipend, if under contract). PAR required (see WDE Time Distribution Policies).

USE	ALLOWABLE & NON-ALLOWABLE EXPENSES
Career and Technical Student Organizations (CTSOs)	<p>Allowable Expenses</p> <ul style="list-style-type: none"> • Advisor travel to conferences, competitions, leadership activities; • Support of student CTSO organization instruction that is an integral part of the CTE Program of Study; • Instructional supplies, materials, and equipment needed to support a student organization as an integral part of the CTE Program; <p>Non-Allowable Expenses</p> <ul style="list-style-type: none"> • Lodging, food, conveying or furnishing transportation to conventions and other gatherings of CTSO students; • Purchase of supplies, uniforms, and other effects for personal ownership or usage; • Cost of non-instructional activities such as athletic, social or recreational events; • Printing and disseminating of non- instructional materials; • Purchase of awards for recognition of students, advisors or other individuals; • Student dues and registration fees.
Teacher Travel to National/State Conferences that meets the requirements of Section 135(b) (5) (A).	<p>Allowable Expense</p> <ul style="list-style-type: none"> • Travel to national and state professional development conferences (ex. National Business Educators Association); <i>the documentation must denote that it meets the Perkins IV requirements for Professional Development. Conference attendees are responsible to share information with other staff to make improvements to curriculum in an effort to improve overall program quality.</i>
Professional Development Activities	<p>Allowable Expenses</p> <ul style="list-style-type: none"> • The cost of professional development activities that: <ul style="list-style-type: none"> ○ Are of high quality, sustained, intensive, and classroom focused as well as a part of a professional development plan; ○ Help CTE teachers and personnel improve student achievement; ○ Help CTE teachers and personnel stay current with all aspects of an industry; ○ Allow CTE teachers to effectively develop rigorous and challenging integrated curricula (jointly with academic teachers) to the extent practicable; ○ Develop a higher level of academic and industry knowledge and skills.

USE	ALLOWABLE & NON-ALLOWABLE EXPENSES
<p>CTE Professional Organization Memberships</p>	<p>Allowable Expense</p> <ul style="list-style-type: none"> • Cost of institutional/district memberships in professional organizations. <p>Non-Allowable Expense</p> <ul style="list-style-type: none"> • Cost of individual memberships in professional organizations.
<p>CTE Instructor/ Support Staff Salaries</p>	<p>Allowable Expense</p> <ul style="list-style-type: none"> • Funds to pay instructor and support staff salaries to start up a program <ul style="list-style-type: none"> ○ This initiative may continue for a maximum of three years. Prior approval of this expense is required by WDE CTE Staff. Personnel Activity Reports (PARs) or semi-annual certification forms are required. <p>Non-Allowable Expense</p> <p>Salary for school support staff that is maintained beyond the three-year period.</p>
<p>Career Guidance</p>	<p>Allowable Expense</p> <ul style="list-style-type: none"> • Funds used to provide career guidance and academic counseling for students participating in, or who may be participating in, CTE Programs.
<p>Training in CTE Non-Traditional Fields</p>	<p>Allowable Expense</p> <ul style="list-style-type: none"> • The cost to support training and activities in non- traditional fields; • The cost of mentoring and outreach activities in non-traditional fields.
<p>Support for Special Populations</p>	<p>Allowable Expense</p> <ul style="list-style-type: none"> • Leasing, purchasing, upgrading or adapting equipment or instructional aides or devices to support the attainment of skills in the classroom; • Testing accommodation materials.
<p>Food</p>	<p>Allowable Expense</p> <ul style="list-style-type: none"> • Meals and incidental expenses (M&IE) associated with staff/teacher travel to conferences, technical assistance and training. <p>Non-Allowable Expense</p> <ul style="list-style-type: none"> • Meals provided for an in-house training or event. For example, providing a lunch/dinner for advisory committee meetings would be unallowable.

SPECIFIC ITEMS OF COST – SEA

EDGAR provides cost principles that WDE must apply when determining whether specific costs are allowable. WDE staff can check all costs against these requirements to ensure the cost is allowable. The allowable/non-allowable list is not exhaustive, but rather a general set of guidelines. If a subrecipient has a question regarding a specific purchase, it is recommended that they contact the WDE Perkins Program Managers for clarification.

In addition to the federal requirements for allowable costs, the state also has requirements that must be met and certain policies and procedures that must be followed in order for a cost to be allowable.

ACCOMMODATIONS FOR INDIVIDUALS WITH DISABILITIES

Individuals who are members of special populations will not be discriminated against on the basis of their status as members of special populations. Accommodations or special strategies to help overcome barriers so that members of special populations can benefit from CTE is an allowable expense. Examples would be large print text and materials converted to braille.

CAREER AND TECHNICAL STUDENT ORGANIZATIONS

Career and Technical Student Organizations (CTSOs) are an important part of the CTE Division of the Wyoming Department of Education. Co-curricular CTSOs can be of great benefit to local CTE programs. Instructional CTSO programs consists of three overlapping parts: classroom instruction, hands-on lab activities, and CTSO activities.

When integrated into local CTE curriculum, the CTSO is a powerful instructional tool which offers organized curriculum-oriented activities that help students maximize employability, gain leadership opportunities, and develop personal skills which enable them to develop into productive members of society.

Currently in the state of Wyoming, there are five state-supported Career and Technical Student Organizations: DECA, FCCLA, FFA, FBLA, and SkillsUSA. The WDE provides state funds annually to support the activities of these five nationally-recognized CTSOs.

PROFESSIONAL DEVELOPMENT GRANT

The WDE CTE team provides a unique opportunity for CTE teachers, faculty, counselors and administrators to participate in high quality professional development. Every year, the WDE sets aside a portion of Perkins leadership funding for professional development mini-grants. The application is provided for eligible subrecipients interested in providing professional development programs, including providing comprehensive professional development for career and technical education teachers, faculty, administrators, and career guidance and academic counselors at the secondary and postsecondary levels (Perkins Act of 2006, Sec. 124(b)(3)). These professional development

programs must be high quality, sustained, intensive, and classroom-focused in order to have a positive and lasting impact on classroom instruction and the teacher's performance in the classroom, and are not one-day or short-term workshops or conferences (Sec. 124(b)(3)(B)).

The grant may be used to send one or more CTE professionals to a state or national conference, training or technical assistance related to innovation in CTE, developing career pathways, integration of academics and CTE, federal accountability and reporting requirements for Perkins, or other applicable professional development opportunities. It may also be used to bring a speaker or trainer to the school or college to facilitate a CTE content-specific training (as long as it is not a one-day or short term training). The grant may not be used to pay for food and/or beverages or any other unallowable uses of funds under the Carl D. Perkins Act of 2006. Applications are reviewed and scored by a grant review committee at the WDE, and amounts awarded are equal to or less than \$5,000.00.

SALARIES

Perkins funding may be used to pay for salaries as detailed in the "Allowable Costs" section above. Salaries for staff/instructors/faculty/teachers may be paid in full or in part with Perkins for the support of new CTE programs for up to three years. We recommend the following: 1) Year 1: 100% Perkins; 2) Year 2: 75% Perkins; 3) Year 3: 50% Perkins; 4) Year 4 and beyond: 0% Perkins. After three years, the salaries for those individuals must be supported with local funds. All LEAs/IHEs funding salaries/benefits with federal funds (including Perkins) must follow the [WDE Time Distribution policies](#) for LEAs and IHEs.

PROCUREMENT

METHODS OF PROCUREMENT (PURCHASE)

The following information is in reference to State and Federal requirements following 2 CFR Part 200.318 General Procurement Standards and applicable Perkins regulation and policies. Subrecipients must establish formal purchase thresholds that align with Federal, State, or local district/college policies (whichever is lower).

MICRO-PURCHASE

Acquisition of supplies and services under \$3,500.00 are considered micro-purchases. Micro-purchases may be made without soliciting competitive quotes if the price is considered reasonable. To the extent feasible, however, subrecipients must distribute micro-purchases equitably among qualified suppliers.

Micro-purchase thresholds are defined by 2 CFR 200.67 and are periodically adjusted for inflation. Therefore this amount can be adjusted as allowable.

SMALL PURCHASE PROCEDURES

Goods or services that cost less than the formal purchase threshold established by subrecipients, and do NOT meet the federal definition for a micro-purchase, are considered small purchases. Subrecipients are not required to follow a formal procurement process for small purchases, however purchases must be done competitively. For example, a subrecipient may choose to contact potential vendors by phone to get price quotes. As long as the process is thoroughly documented, phone contacts are allowable.

FORMAL PURCHASES

Formal purchase contracts may not be awarded to potential vendors that wrote bid specifications, solicitation documents, or the contract. Potential bidders may provide information for the specifications but cannot prepare documents.

Identical solicitation specifications or requests for proposals must be provided to all potential vendors. This must include all important information such as delivery schedules, quantities, product specifications, and purchase conditions.

Subrecipients will verify that all contracts and procurements are net of all applicable discounts, rebates, and credits. All contractors will maintain records and source documents in support of all costs, discounts, rebates, and credits.

Contracts made under a federal award (such as Perkins) will also contain all applicable federal provisions as referenced under Appendix II of *Part 200-Contract Provisions for Non-Federal Entity Contracts Under Federal Awards*.

Debarment and Suspension: All contracts to be paid with federal assistance must have verification regarding debarment and suspension.

Standards of Conduct: The subrecipient must maintain written Standards of Conduct governing the performance of their employees engaged in award and administration of contracts supported by federal funds. Therefore, within this policy the standards of conduct must include that there will not be employees engaged in any procurement when there is a conflict of interest, real or perceived, and employees cannot solicit or accept any gratuities, favors or anything of monetary value from prospective vendors. These standards must also include disciplinary actions that will occur if employees are found to be in violation of this policy (2 CFR, Part 200.318(c)(1)).

PROPERTY MANAGEMENT

TYPES OF PROPERTY

There are seven classifications of property:

Capital Assets: Tangible or intangible assets used in operations having a useful life of more than a year, includes: land, buildings, equipment, intellectual property, software, or construction (2 CFR Part 200.12).

Computing Devices: Machines used to acquire, store, analyze, or process public data and other information electronically. Includes accessories for printing, transmitting, receiving, or storing electronic information (2 CFR Part 200.20).

Equipment: Tangible, personal property (including information technology systems) having a useful life of more than one year and a per unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the non-federal entity for financial statement purposes (2 CFR Part 200.33). In Wyoming, the Perkins threshold for equipment is \$1,500.00.

Special Purpose Equipment: Equipment which is used only for research, medical, scientific or other technical activities. Includes X-ray machines, surgical instruments, and microscopes.

Intangible Property: Property having no physical existence, such as trademarks, copyrights, patents and patent applications and property such as loans, notes and other debt instruments, lease agreements, stock and other instruments of property ownership (2 CFR Part 200.59).

Property: Real property or personal property (2 CFR Part 200.81).

Real Property: Land and land improvements, structures and appurtenances thereto, but excludes moveable machinery and equipment (2 CFR Part 200.85).

Supplies: All tangible personal property other than those described in 2 CFR Part 200.33 - Equipment. A computing device is a supply if the acquisition cost is less than the lesser of the capitalization level established by the non-federal entity for financial statement purposes or \$5,000, regardless of the length of its useful life (2 CFR Part 200.94). See also 2 CFR Part 200.20 Computing Devices and 2 CFR Part 200.33 Equipment.

All equipment and non-consumable supplies should be inventoried upon receipt.

EQUIPMENT STANDARDS

WDE will consider equipment listed in the “Equipment Location” tab on the Perkins grant application in GMS sufficient for most equipment purchases over the \$1,500.00 threshold.

For sole-source procurements, EDGAR specifically states that the pass-through entity can provide express approval to a written request in order for subrecipients to proceed with procurement (2 CFR 200.320(f)(3)). The subrecipient wishing to use sole source must submit a specific written request to and receive formal approval from WDE, unless one of the other circumstances described by EDGAR is met (2 CFR 200.320(f)).

Keep in mind that EDGAR prohibits specific brand name requests, so if a subrecipient plans on submitting equipment requests via GMS OR sole-source procurement requests, they must not reference specific brand names (2 CFR 200.319(a)(6)). Instead of specifying a brand name, an “equal to” brand name product should be sought, and a description of the performance or other relevant requirements sought should be provided.

A state must use, manage and dispose of the property in accordance with state laws and procedures. Other non-federal entities must follow these guidelines:

- A. Equipment must be used by the non-federal entity in the program or project for which it was acquired as long as needed, whether or not the project or program continues to be supported by the federal award, and the non-federal entity must not encumber the property without prior approval of the federal awarding agency. When no longer needed for the original program or project, the equipment may be used in other activities supported by the federal awarding agency, in the following order of priority:
 1. Activities under a federal award from the federal awarding agency which funded the original program or project, then
 2. Activities under federal awards from other federal awarding agencies. This includes consolidated equipment for information technology systems.
- B. During the time that equipment is used on the project or program for which it was acquired, the non-federal entity must also make equipment available for use on other projects or programs currently or previously supported by the federal government, provided that such use will not interfere with the work on the projects for which it was originally acquired. First preference for other use must be given to other programs or projects supported by federal awarding agency that financed the equipment and second preference must be given to program or projects under federal awards from other federal awarding agencies. Use for non-federally funded programs or projects is also permissible. User fees should be considered if appropriate.
- C. The non-federal entity must not use equipment acquired with the federal award to provide services for a fee that is less than private companies charge for equivalent services unless specifically authorized by federal statute for as long as the federal government retains an interest in the equipment.

- D. When REPLACING equipment that was originally purchased with Perkins funds, the LEA/IHE must cover 51% with local (non-federal) funds and may cover 49% with Perkins funds.

When acquiring replacement equipment, the non-federal entity may use the equipment to be replaced as a trade-in or sell the property and use the proceeds to offset the cost of the replacement property (2 CFR Part 200.313 (c)(4)).

CONDITION OF EQUIPMENT DEFINITIONS

Disclaimer: These definitions are provided as general guidelines only.

New: Equipment has never been used, and is still in original packaging. Equipment is assumed to be in full working order and immaculate physical condition.

Demonstrator: Unit has only been used a few times for little to no experimental purposes, commonly at a tradeshow or conference. May have minor physical damage, scuffs, and small dents. Unit is in full working order.

Excellent: Equipment is in full-working order, immaculate physical condition, with no dents, scratches or rust. May have been opened and installed, but has either never been used, or has been used only once or twice. System has been fully tested for operability.

Refurbished: Equipment is used but has been rebuilt to factory specifications, with any broken or worn parts having been replaced.

Good: Equipment has been used regularly. System is in good physical condition, but may show minor physical wear such as scuffs or scratches. Unit is in full working order.

Fair/Working: Unit may show signs of physical wear, such as scratches and dents. Appears to be working, powers up if applicable, but may be untested for specific and accurate operation.

Serviceable: Unit is in mostly working order, could be restored to full working condition with the help of a service technician.

Needs Repair: Not in working order. Be prepared to have it fixed or have a large, lovely paperweight.

Rough Shape: Dented, scuffed, and scratched with working condition unknown. Components may be hanging or missing. Duct tape may be holding this unit together.

INVENTORY PROCEDURE

The LEA/IHE must maintain current inventory lists for all Perkins equipment with current market value exceeding \$1,500.00 per item or is considered a computing device. Also included in the inventory should be any items that could be considered “pilferable” (capable of being stolen), such as camera equipment. The equipment inventory may be in the form of a list or electronic spreadsheet, and should follow the guidelines set forth by EDGAR 2 CFR 200.313(d)(1). The following are also true for equipment:

- A. At least once each year, a physical inventory of equipment must be taken and the results reconciled with the equipment inventory to verify the current utilization of the equipment. Additional inventories may be performed by the Perkins Coordinator or designee at various times to verify school compliance with federal, state, and local requirements.
- B. Any differences between quantities determined by the physical inspection and those shown on the inventory must be investigated to determine causes of the differences and reconciled.
 - 1. A control system must be in place to ensure adequate safeguards to prevent loss, damage, or theft of equipment. Any loss, damage, or theft of equipment must be investigated, fully documented, and reported to the LEA/IHE Perkins Coordinator.
 - 2. Adequate maintenance procedures must be implemented to ensure that all equipment is kept in proper and safe operating condition.
 - 3. Disposition of equipment must include date of disposal and sale price of the property.
- C. All equipment purchased with Perkins funds **MUST** be labeled with “Perkins” and the fiscal year or program year purchased. For example:

Note: LEA and IHE compliance with these inventory requirements is assessed during the Perkins Monitoring Review process (2 CFR Part 200.303).

RETENTION REQUIREMENTS

Financial records, supporting documents, statistical records, and all other non-federal entity records pertinent to a federal award are to be retained for a period of five years from the date of submission of the final expenditure report. EDGAR 2 CFR Part 200.333.

OTHER FEDERAL REQUIREMENTS

TEXT MESSAGING & EMAILING

Federal grant recipients, sub recipients and their grant personnel are prohibited from text messaging while driving a government owned vehicle, or while driving their own privately owned vehicle during official grant business, or from using government supplied electronic equipment to text message or email while driving.

Recipients must comply with these conditions under Executive Order 13513, "Federal Leadership on Reducing Text Messaging While Driving," October 1, 2009.