Perkins Updates
Today Is For You!

- Perkins Updates
- Local Plan Examples
- Time & Effort Reporting
- Program Income
- Addressing Performance Metric Deficiencies
Perkins Updates

Workforce Innovation & Opportunity Act

3:00 P.M. Thursday February 9 in River Birch A
Perkins Updates – New Staff

Amy Cromwell
Grant Accountant
(720) 858-2894
Amy.Cromwell@cccs.edu

Amy joined the CCCS Finance team as our new Grant Accountant in January!
Perkins Updates – Perkins 101 Training

Counts toward CTE Director Credential

- **CCCS**, IT Building on Wednesday March 15, 2017 from 8:30 A.M. to 12:00 P.M.
- **Fountain 8** School District Board Room, Wednesday April 12, 2017 from 8:30 A.M. to 11:30 A.M.
- **Montrose** School District Board Room, Thursday May 4, 2017 from 8:30 A.M. to 12:00 P.M.
- **Greeley** School District Service Center, Wednesday, May 17, 2017 from 8:30 A.M. to 12:00 P.M.
Map of Spring Perkins 101 Workshops
Perkins Updates – Perkins Training

- Training & Technical Assistance On Request
  - Flexible delivery options
  - Customizable
  - Process walkthrough
Update - Perkins Eligibility

- Meet “Eligible Recipient” Definition

- Have a CTE Program approved by CCCS OR
  Be a consortium member with approved plan by end of year

- Have Programs of Study on file at CCCS by February 27, 2017
Update - Perkins Processes
(Handbook Section V)

- Intent to Participate (February due date) C3
- Initial Award Estimate (June) C4
- Detailed Performance Metric Reports (June) C5
- Local Plan Submission (June-September) C6-C18
- Grant Implementation (later of July 1 or plan submitted)
  - First Installment
- Award Packet (October) C19
- Voucher Submission (October-August) C20
- Initial Local Improvement Plans (Jan./Feb.) C21
Update – Voucher Reminder

- Reimbursement grant

- Minimum 2 Required
  - January 31
  - May 15 (if award $100k+)
  - Last Business Day in August

- Submit documentation
  - Voucher signature page
  - Invoices/Equipment over $1,000
  - General Ledger
  - Payroll Register
  - Support for generic charges (i.e. Amazon, Walmart)
Update – FY17 Voucher Status

- $14.4 Million Awarded

- Voucher 1 Due January 31, 2017
  - 15.6% of award requested
Local Plan Examples
Local Plan Submission

- 5-year Strategic Plan
- Final Local Improvement Plan (if applicable)
- 1-year Local Plan
  - Funded Projects
    - Allowable activities/costs
    - Address uses of funds & performance metrics
    - Approved CTE programs
    - New program development
- General Assurances
- Year End Analysis (of previous year)
Funded Projects

<table>
<thead>
<tr>
<th>Project Objective</th>
<th>Actual Level (%)</th>
<th>Project Goal (%)</th>
<th>Timeline</th>
<th>Requirements / Permissible</th>
</tr>
</thead>
<tbody>
<tr>
<td>S2-Academic Attainment (Mathematics)</td>
<td>25.00</td>
<td>29.00</td>
<td>By FY1819 End</td>
<td>Academic Rigor - Requirement</td>
</tr>
</tbody>
</table>

Year End Analysis

<table>
<thead>
<tr>
<th>Name of Project</th>
<th>Project Objective</th>
<th>Goals Selected</th>
<th>Timelines Selected</th>
<th>Current Actual</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>FY2015-2016 Funded Project</td>
<td>S2 - Academic Attainment (Mathematics)</td>
<td>27.0</td>
<td>FY1617</td>
<td>25.00</td>
<td>Although the Consortium did not meet our target goal of 27% and still remains below the state target of 35%, the consortium did show an improvement of 4% from the previous year’s 2013-2014 data. This is reflected in the subpopulation data with a 4.6% increase for females, 3.1% males, and 12.8% Hispanics. However, economically disadvantaged decreased by 3.4%. Mathematics Academic Attainment is an onerous project and activities across the Districts are on</td>
</tr>
</tbody>
</table>
Best Practices

- Begin the year prepared with a plan
  - Plan should support institution & State priorities/goals
  - Involve stakeholders
  - Review data

- Spend as early as possible
  - Review budget to actual

- Revise plan as needed

- Ensure Internal Controls are in Place
Local Plan Examples

Begin Year Prepared with a Plan

Fort Morgan RE-3
Morgan Community College

- No ambiguous placeholders
- Submitted by July 1
Local Plan Examples

Involve Stakeholders

CAVOC Consortium Otero Junior College

- Clear that advisory boards were consulted
- Collaboration by college with service districts
- Collaboration by consortium members evidenced
Local Plan Examples

Review Data

Thompson R-2J Plateau Valley 50

- Discussion of data throughout plan
- Programs funded in projects with deficiencies had program level deficiencies in same area
- Local Improvement Plan responses and Year end analysis reflected progress to date
Local Plan Examples

Spend as Early as Possible
  - Review Budget to Actual

Colorado Mountain College
High Country Consortium

- Knowledgeable of federal grant requirements
- Knowledgeable of Perkins
- Spends early and updates plan to make additional funds available
- Submits multiple vouchers throughout year
Revise Plan as Needed

Front Range Community College

- Plan submitted timely
- Revisions are grouped, periodic, and clear as to what changed
- Second revision in spring
Local Plan Examples

Ensure Internal Controls Are In Place

East Central BOCES Consortium

- Group decides what is in plan
- Purchases made centrally
- Receiving documented
- GL ties to local plan
- Documentation for travel/subs required before reimbursement
Local Plan - Uses of Perkins Funds

SUPPLEMENT

- Expand
- Enhance
- Improve
- Creating
- Partner
- Inclusiveness

SUPPLANT

- Recurring
- Routine
  - i.e. supplies, software
- Maintenance
  - i.e. of program
- Replacing
  - i.e. computers
How Do the Feds Define Supplanting?

- Funds that do not supplement non-Federal funds for CTE

- Perkins funds services/activities the District/College
  - was required to make available under other Federal, State or local laws,
  - provided with non-Federal funds in the prior year; or
  - provided with non-Federal funds for non-career and technical education students but charged to Perkins for career and technical education students

Exception: CTE Services necessary for an IEP or 504 to ensure equal access to CTE
Time & Effort Reporting
Compensation Costs Allowable if:
- Costs support Perkins Act objectives (Section 135)
- Costs are reasonable for services rendered & follow policy
- Costs are consistently applied (federal or non-federal pay is same)
- Personnel appointment is made according to internal policies
- Costs are documented
Personnel Activity Report (PAR in guidance)

- Required if employee works on multiple activities or cost objectives

PAR must:

- Reflect after-the-fact distribution of time (i.e. timesheet)
- Account for TOTAL activity for which employee was paid
- Be prepared monthly (minimum) AND coincide with pay periods
- Be signed by employee
  - Recommend signed by supervisor for internal control purposes
What is a Cost Objective? (9/2012 ED DCL)

“Function, organizational subdivision, contract, grant, or other activity for which cost data are needed and for which costs are incurred”
9/2012 ED Dear Colleague Letter permits a substitute system for documenting time and effort IF employee works on a consistent schedule on the same (single or multiple) cost objectives.

- Semiannual certification required
- Signed by employee
- Signed by supervisor
- Significant deviations must be documented using a PAR (timesheet)

In audit, the semiannual certification would need to be supported by something (schedules, contracts, sign-in sheets)!
Program Income
What is Program Income?

2 CFR § 200.80 “Gross income earned by the non-Federal entity that is directly generated by a supported activity or earned as a result of the Federal award during the period of performance…”

- Fees for services performed
- Use or rental of real or personal property acquired under Federal awards
- Sale of commodities or items fabricated
- License fees, royalties principal and interest on loans
Examples of Program Income

- School based enterprises (school store)
- Salons
- Restaurants/cafes
- Sales of sheds, birdhouses, engraved items, etc.
- Print shops
- Rental of CTE lab spaces to outside groups

*Note: This list is not exhaustive!
Is Program Income Permitted?

YES!
Program Income Requirements

- Costs of generating income may be deducted from gross income
- Program income must be tracked

- May be added to grant (2 CFR 200.307(e)) (2/5/16 ED Memo)
  - Addition Method
    - Must “be used for the purposes and under the conditions of the Federal award.”
Addressing Performance Metric Deficiencies
Addressing Performance Deficiencies

- Meet to discuss
  - Look at program level data
  - Look at disaggregated data
  - Consider outside data sources (i.e. Census, enrollment projections)
- Brainstorm with LOTS of People
  - Survey students
  - See who is doing well with that metric (use Reports)
- Incentivize solutions (i.e. Perkins funded)
  - Design a PROJECT
Tips & Resources

- **Colorado State Plan Website**
  - [http://www.coloradostateplan.com/index.htm](http://www.coloradostateplan.com/index.htm)
- **Administrators’ Handbook**
  - [http://www.coloradostateplan.com/admin_handbook.htm](http://www.coloradostateplan.com/admin_handbook.htm)
- **CTE Online Account**
  - [https://cte.cccs.edu/perkins/menuPreAction.do](https://cte.cccs.edu/perkins/menuPreAction.do)
- **Uniform Grant Guidance**
- **EDGAR**
Questions

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