Nebraska Career & Technical Education

Perkins

Questions and Answers Guide - 2019

To assist the grantees of the Strengthening Career and Technical Education for the 21st Century (Perkins V)

- reVISION funds follow Perkins eligible expenditure guidelines and GMS requirements.
- Explains Program Facts template
- Perkins funds may not be carried over to the next fiscal year
- Missing a state goal on a Perkins Performance Measure requires submission of a Perkins Improvement area and missing a Perkins Performance Measures for 3-years in a row requires the expenditure of funds
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Perkins Questions Guide

Quick References and Helpful Hints

Allowable/Unallowable Expenditures

**Food**

*Question:* Does the Perkins grant allow the purchase of food?

*Answer:* These questions are best referred to OMB Circulars A-87. This regulation basically states that the costs of meetings and conferences of which the primary purpose is the dissemination of technical information allows for working lunches, transportation, rental of facilities, speaker fees and other incidental items. The costs should also be considered necessary and reasonable. Working refreshment breaks and breakfasts are NOT allowable.

Always consider if this is the best use of funds; necessary and reasonable.

**Others**

Construction costs and materials for a permanent structure or anything that becomes a part of a permanent structure (e.g., greenhouses, area dividers, exhaust systems with dampers) are not allowable expenditure.

Librarians are not CTE teachers and reimbursements or other expenditures for them are not allowable.

Car repairs are not an allowable expenditure.

*Question:* Is equipment and software that is used for media production (business and technology) reimbursable?

Object Code 100: Salaries for personnel directly employed by the ESU or school including sub-pay

Object Code 300: Payment made to a teacher not directly employed by the school or ESU, e.g., consultants, or PFI

*Note:* If an entity is making a direct payment to an individual then it’s a 100. If you are reimbursing the school because they paid the teacher or individual through their system, it should be Object Code 300.
Allowable/Unallowable Expenditures-continued -

**Answer:** The equipment would only be allowable depending on what is written in the application to how it is intended to being used within the curriculum. The software would **not** be allowable if the software would be used outside the classroom (i.e., school events, athletic games, etc.) or for Journalism courses.

**Question:** Can a software program that teaches record-keeping and used by individual students be purchased with Perkins funds?

**Answer:** Depends on the program. Is it for a CTE program and improves the technical skill development of the student? More detailed information should be provided to the NDE monitor, but it probably is allowable.

Health Science items that are allowable:

- Blood Pressure cuff
- Stethoscopes
- Infrared Thermometers
- Hearing test kits
- Reflex Hammers
- Ear Scopes

**Question:** Are drill-bits and saw blades considered “consumable”?

**Answer:** Yes, they are consumable. Also, tools such as pliers are considered basic tools and not “innovative” so would not be an allowable expenditure.

Markers, glue, shears, file folders, thank-you notes, and printer ink or toner are examples of consumables and not allowable expenditures.

**Question:** Are ergonomic and/or state-of-the-art tools and tool kits allowable expenditures?

**Answer:** Yes, they are allowable; however, they should be a part of an innovative program that combines rigorous academic instruction with career education. However, they cannot be consumable.

**Question:** A Lithium-ion starter kit is described as being important to the revision of woods courses to make them more in line with local career tracks and provide students with training and experiences relevant to local careers. Is this item allowable?

**Answer:** Yes, it is allowable **IF** it is a first-time purchase.

**Question:** Can Perkins funds be used to pay a teacher to teach zoology at a career academy?

**Answer:** No, this would not be allowable. Zoology is not part of an approved program of study.

Allowable/Unallowable Expenditures • 2
**Allowable/Unallowable Expenditures** - continued -

**Question:** Would LEGO Mindstorms Education Core Sets be allowable? These are designed for teaching robotics, STEM, critical thinking and collaboration/communication skills.

**Answer:** Yes, it is allowable **IF** it is used in a CTE Program of Study.

**Question:** Do I have to include administrative costs (limited to 5%) in the grant?

**Answer:** You do not have to include administrative costs. However, if you do, you do need to do time certification.

**Question:** Can a clerical person’s time spent on administration of the grant be funded through Perkins?

**Answer:** Yes, as long as positive time certification records are kept and the amount is under the 5% cap.

**Question:** Can funds be used for salaries not considered “Administration”, e.g., substitute teachers so that teachers can receive professional development in Career Ed academies and training expenditures so that a teacher can become a career academy leader?

**Answer:** Yes, it is allowable.

**Question:** Can Perkins fund the salary for a full-time CTE position?

**Answer:** Yes, however it needs to be a “new” position and can only support the salary for up to 3 years. *If the position was previously ½ time and the objective is to increase to full-time, only ½ the salary can be funded for up to 3 years.*

**Question:** Can Perkins funds be used to support an aligned academic class offered as a part of a career academy?

**Answer:** No, however the academic instructor may participate in professional development if it is also offered to CTE instructors.

**Question:** Can Perkins funds be used for pay for the professional development of CTE and/or core academic teachers that are part of a technical science academy teacher externship?

**Answer:** Yes, however we would need to have a very clear rationale for paying them including the purpose of the payment, their responsibilities (in an academy) and how the professional development aligns to the program offered.

We will need to know more about the academy and the actual externship they have in mind (alignment to program offered, description of the outcomes from the professional development.)
Allowable/Unallowable Expenditures - continued -

**Question:** Are Real Care Infant Simulators (Baby Think It Over) an allowable purchase for a consortium to provide for check out? (The babies have been the one item most frequently check out and utilized by FCS and health teachers in our consortium.)

**Answer:** They are allowable with the following stipulation for each school to use them:

They are not allowable for a teen parents program. The use of the requested materials must directly relate to the current standards and Programs of Study. If the requested items were going to be used as part of FACS Program of Study course (e.g. Child Development course in Early Childhood Education and Services) then they would be allowable. The teacher(s) that would be using the materials must attend the $150 (approximately) training offered by the manufacturer to teach using best practices for the materials.

**Question:** Can a school receive reimbursement for an on-line college-prep test that is used in the guidance program?

**Answer:** This is considered a direct benefit to students; nor is it a curriculum that can be reused. *Perkins funds are not to be used to pay for any testing, licensure, or certification of students.*

**Question:** Are working lunches for CTE Advisory committees permissible?

**Answer:** If the lunches/refreshments breaks are essential to the meeting and the agenda reflects that meaningful work is taking place during lunch, it is currently permissible.

**Question:** Can Perkins funds be used to pay for other CTE activities’ lunches/refreshments?

**Answer:** Only if it is written in the grant as part of a CTE activity. The approved CTE activity should have an agenda that reflects the work that is taking place and considered necessary to the primary purpose of disseminating technical information. Refreshment breaks are not approvable and the lunch has to be hosted as a “working lunch.”

**Question:** Can Perkins funds be used to pay for a retractable harness for construction technology? These are required per OSHA.

**Answer:** Yes, this is approvable item to spend Perkins funds as the harness is mandatory for roof repairs and is industry grade.
**Perkins Questions Guide**

**Allowable/Unallowable Expenditures—continued**

**Question:** Can Perkins funds be used to pay for a speaker whose topic is centered on a Career Field?

**Answer:** It would be appropriate to spend Perkins funds for a speaker whose content can be directly tied to course/program of study standards/benchmarks for one or more career fields and/or career readiness standards identified in our NCE Career Readiness Standards.

**Question:** Can Perkins funds be used to support an aligned academic class offered as a part of a career academy?

**Answer:** No. However, the academic instructor may participate in professional development if it is also offered to CTE instructors.

**Question:** Can we have a technician repair a piece of equipment? Should we use funds in the 300 Object Code?

**Answer:** Yes.

**Question:** Can we use our 5% Administrative costs allotment to pay for Advisory Meeting related expenses?

**Answer:** Administrative costs must be associated with the direct administration of the local application. Costs are limited to no more than 5% of total allocation. Approved indirect costs are considered administrative costs and must be included in the 5% limitation. Documentation of actual expenses must be maintained to claim the 5% administrative cost. Budget and reporting of the direct administrative expenditures should appear in the appropriate object code. Expenses associated with conducting an advisory committee meeting may be considered a direct or indirect administrative cost. This may include meals or breaks associated with the meeting.

**Question:** Under Category 300, Professional & Technical Services, what exactly can the grant reimburse?

**Answer:** Costs associated with participation in both in-state and out-of-state conferences are approvable as requested in the local application. Personnel travel is limited to mileage, airfare, meals and lodging. Travel must be justified in terms of value. Cost of training provided for teacher development is allowable. This may include cost of meals and breaks subject to the federal guidelines. No entertainment expenses such as alcohol, movies, etc., may be reimbursed.
**Allowable/Unallowable Expenditures - continued -**

We usually get requests to pay for the cost of local advisors attending CSO conferences. While our standard policy is “no – that is a local responsibility,” we have some clarification from the feds:

If a district wants to go through the pain of breaking out the percentage of expenses and time certifying, they could get reimbursed for the professional development component of the conference. This is professional development beyond the competitions – not a session on how to prepare your students for competition.

Perkins can pay for time and travel for professional development that improves teaching and learning - not the supervision of students or competition preparation. We would need proof that the advisor attends those sessions and is not just there to supervise students and watch the competitions. Perkins could reimburse expenses for that percentage of time, not the entire trip because supervision of students is a local responsibility and expense. (If we paid for their time and expenses, it could imply our responsibility if there is a student issue. *This also applies to a person who wants to attend a conference before starting a chapter – again, we could only pay for that portion that is directly related to professional development.*

**Question:** Can Perkins funds be used to pay community colleges instructors’ time to develop dual credit courses (curriculum)?

**Answer:** Only if it was to pay for non-contractual time used. It must also be very clear that payment to the community college instructors was payment to “outside consultants” (in other words, not part of their regular contract duties).

*Before agreeing to payments, it is advisable to check into whether a community college should be providing assistance on dual enrollment courses as part of their regular program of work.*

**Question:** Can Perkins funds be used to pay for a school counselor to attend a conference that is held the last few days of June and into July (the start of a new Grant Award)?

**Answer:** Federal Guidelines 76.707 states that personal services by an employee of the State or a subgrantee are obligated when the services are performed. So the contracted services payment could only be for the days prior to the end of the fiscal year out of the current fiscal year’s grant.
Amendments

AMENDMENTS ARE REQUIRED WHEN:

The scope of the program is expected to change, either to remove or add a new activity OR
Grantees wish to revise amounts across major object codes OR
Changes are GREATER than 25% of the approved budget or at least $2,500.

Creating Amendments Step-by-Step

1. Go to the GMS Access Select page. Select the current Fiscal Year. Open the current grant and go to the Page Lock Control tab to open the pages you need to amend. (All pages are locked after an application is submitted. You will need to “open” them to have access to a Save Page button.) This may need to be done by the District Administrator.

2. Go to the GMS Access Select page. Select the current Fiscal Year. Click on the blue “Amend” button on the right of the Perkins Basic Grant. This will open the application.

3. In the open application, click on the Amendment Description tab to open a description text box. List all changes to be made for NDE’s review and make adjustments on necessary pages. Save Page when finished.

4. Rerun the consistency check and Submit to return to NDE for review.

5. If the Consistency Check has been run, but additional changes are needed, the application may need to be again unlocked. This can be done on the Submit tab.

* An amendment cannot be created until after an application has been approved. Selecting an application with a status of “Submitted for Review” will result in the Create Amendment button being disabled.

Question: I need to move money because my invoice is higher than I had originally written, but everything is still budgeted under the same category. Do I need to create an amendment?

Answer: No. Not when the budget amount and the category remain the same.
Amendments-continued -

**Question:** Is it okay to purchase a different item than what was originally requested in our Application? Do I need to create an amendment?

**Answer:** Adjustments to original purchase requests are allowable as long as they are approvable under Perkins law and meet your justification requirements. If the items fall into the same budget category (supplies, for instance), you would not need to do anything in GMS.

If the purchases will fall into a different category than originally purchased, and you need to move remaining funds from one category to the other to have enough to cover the costs, you’ll need to submit an amendment in GMS with the explanation.

Finally, the purchase should be fine using current grant funds as long as they are obligated by June 30.

Example: Current Budget 600 Category $43,391.00
25% of $43,391.00 equals $10,847.75
This is larger than $2500 so you work with the 25% amount option.
No amendment is necessary if you use a budgeted amount up to $52,238.75.

**Question:** Due to inclement weather, activities were cancelled and I have leftover funds in my budget. Do I need to create an amendment?

**Answer:** If you reallocate funds because of a cancelled event and it adds to less than 25% of the available funds AND it is used within the same category, you will not need an amendment.

Be sure to keep your NDE monitor informed of the new purchase so a cross-reference can be made on the Final Claim for Reimbursement. The best record is to add in a description of the changes within the GMS system’s Comments tab.
Budget Questions

Allocations

An application for Perkins funds must be approved before any funds can be obligated from it.

**Question:** Can a percentage of the consortium’s allocation be used to pay for each of its districts’ membership fees with a vendor?

**Answer:** Yes, however, just like any other expenditure the fee must align with the overarching CTE plan for the consortium and is considered an allowable expense. A vendor must provide a description of exactly what the fees are for, detailed information on any personnel services charged to the grant and the item’s purpose.

**Question:** Can a consortium agree to distribute the money equally between all districts using all the money for the same programs that are mutually beneficial? Or can a consortium agree to distribute the money on a per pupil rate?

**Answer:** No. This would be considered a grant-back program since allocations are based on student population and poverty within the allocations formula. Neither does the money belong to individual schools, but to the consortium. Dividing the money between the schools would also be an audit exception. The Perkins grant is designed to not directly benefit students, making the number of students in a district a non-factor.

Perkins is about the programs offered, not the number of students taking the programs. *Not following the Legislative Guidelines could remove a consortium’s eligibility from the grant.*

 Carry Over Funds

Perkins does not allow carry over funds for their annual grants.

Obligations cannot be made prior to or after the Grant Period.

*After* October 1, reimbursement requests up to 50% of the grant are allowed without documentation and set for auto-processing.
**Budget Questions**-continued –

**Question:** We have a new position to be funded with Perkins Funds. If we hire this person in March, will that count as year 1 towards the 3-year funding limit?

**Answer:** This position would be reviewed within each application over the 3 years, so yes, even though the salary would only be for 4 months of the grant, it would still count as year 1.

**Administrative Costs**

Administrative costs must be associated with the direct administration of the local application. Costs are limited to no more than 5% of total allocation. Approved indirect costs are considered administrative costs and must be included in the 5% limitation. **Documentation of actual expenses must be maintained to claim the 5% administrative cost.**

Budget and reporting of the direct administrative expenditures should appear in the appropriate object code. Expenses associated with conducting an advisory committee meeting may be considered a direct or indirect administrative cost. This may include meals or breaks associated with the meetings.

The allowable rate should be the LEA’s or Consortium’s Approved Rate when it is LESS than the 5% maximum. (Up to 5% is the rate allowable by Perkins law.)

**Examples:** If the 5% is claimed for staff time, it should be in Category 100-Salary and Category 200-Employee Benefits.

If the 5% administrative cost is directly associated with advisory committee meals or other related expenditures, it would be coded to Category 300- Professional & Technical Services or Category 400-Other Purchased Property / Other Purchased Services depending on the type of purchases involved.

If it is to pay mileage for coordination and technical assistance, it would appear in Category 500-Other Purchased Services.

**Question:** I made a correction in my Budget, but the correction is not updating in the Budget Summary.

**Answer:** If you are changing numbers in the Budget Detail, you have to remove the incorrect line and reenter with a new entry. After saving the page, the Budget Summary should be correctly updated.
Budget Questions - continued -

Question: I want to move money from a 400 category to a 600 category. However there was nothing budgeted in 600 from the beginning of the year’s plan. Is it a problem to now shift money to a new category? I read there are warnings about “no flexibility”.

Answer: It is permissible to make budget changes if the changes meet the program’s plan. The warning of “no flexibility” is to inform you that you cannot post any expenditures in an object code with $0.00 budgeted. With an Amendment, funds can be moved into a new category that previously had none.

Question: It is June 15th and our Accountant already processed June payroll. Should a special payroll check be issued or can this stipend be paid in July’s payroll? What about Time and Effort reporting?

Answer: If it is June’s time worked on a June Timesheet, you can allow it as an obligation for a payment being made in July. Time and Effort reporting would follow.

Question: Indirect Costs?

Answer: Institutions can only claim 5% for indirect costs under the 300 object code (Direct or Indirect). As long as the amount is budgeted, the cost rate should be identified in the narrative.

Direct costs can be identified specifically with particular cost objectives such as a grant, contract, project, function or activity.

What are considered DIRECT Costs? Direct costs generally include:

- Salaries and wages
- Other employee fringe benefits allocable on direct labor employees.
- Consultant services contracted to accomplish specific grant objectives.
- Travel of employees.
- Materials, supplies and equipment purchased directly for use on a specific grant or contract.
- Communication costs identifiable with a specific award or activity.
Conference Registration/Professional Development

**Question:** Can Perkins pay for registration and costs of attending a conference that centers on Special Needs students or general education improvement?

**Answer:** No. Perkins can only pay for the expenses of CTE teachers centered directly on CTE activities. The conference would need to be a CTE-based conference.

**NETA Conference**

**Question:** The district sent teachers to the NETA conference and some were CTE; some taught just technology classes; and some were administration. Can all those be reimbursed?

**Answer:** No. Only CTE teachers may be reimbursed. Furthermore, approvable conferences must focus on improvements specific to CTE which NETA routinely does not. Other teachers would need to justify how the conference would be used to directly improve CTE programs.

Also, Principals and Administrators are typically on contract and would not qualify for stipends.

**Nebraska School Counselor Academy**

**Question:** Can Perkins support school counselors to attend the annual NSCA?

**Answer:** Yes, Perkins funds can be used to support school counselors in their attendance if there are career guidance sessions offered at the conference and they participate in these sessions.

**Question:** Can workshop registrations designed for new teachers, including new CTE teachers, be reimbursed?

**Answer:** Perkins funds must be used to advance career and technical education. Registrations to workshops **not specifically designed** for Career and Technical education are not reimbursable.

**Question:** Can Professional Development be provided for Core Academic teachers, Counselors and Administrators in conjunction with CTE instructors?

**Answer:** Perkins funds are specifically for supporting CTE programs. Academic staff can be included if they are an integral part of the CTE program of study/activity. In other words, “the **primary focus** needs to be CTE staff.”

**Question:** An English teacher and a business teacher, collaborate on classroom projects that unite literacy skills in a business context. This English teacher also assists with FBLA projects and is very interested in being better able to collaborate further with CTE educators. She’d like to attend the NCE Conference with the business teacher. Can we support this request?

**Answer:** See Answer above.
Conference Registration/Professional Development - continued -

We usually get requests to pay for the cost of local advisors attending CTSO conferences. While our standard policy is “no – that is a local responsibility,” we have some clarification from the feds:

If a district wants to go through the pain of breaking out the percentage of expenses and time certifying, they could get reimbursed for the professional development component of the conference. This is professional development beyond the competitions – not a session on how to prepare your students for competition.

Perkins can pay for time and travel for professional development that improves teaching and learning - not the supervision of students or competition preparation. We would need proof that the advisor attends those sessions and is not just there to supervise students and watch the competitions. Perkins could reimburse expenses for that percentage of time, not the entire trip because supervision of students is a local responsibility and expense. (If we paid for their time and expenses, it could imply our responsibility if there is a student issue. This also applies to a person who wants to attend a conference before starting a chapter – again, we could only pay for that portion that is directly related to professional development.

**Question:** Can I pay for registration in the current fiscal year’s grant period that is for a conference held in the next year’s grant period?

   **Answer:** Yes, IF the conference is scheduled to be held relatively soon after the grant period ended (e.g., in the month of July) and IF the advantages to registering before June 30 are to save significant grant dollars (e.g., Early Bird registration).

**Question:** Can I pay staff for attending a “Return to Industry” experience where they spend a few days in industry learning alongside our industry partners increasing their ability and skill?

   **Answer:** Yes, IF they are not on contract. E.g., if the experience occurred during the summer.

**Question:** A school counselor will be attending the American School Counseling Conference this summer. The dates June 28-July 2. Can she be paid for all 5 days out of the current grant dollars?

   **Answer:** Federal Guidelines 76.707 (When Obligations are Made) states that personal services by an employee of the state or a subgrantee are obligated when the services are performed. So the contracted services payment could only be for the days prior to the end of the fiscal year (June 28-30) out of that fiscal year’s grant.

**Question:** Can Connecting the Dots: A Career Exploration Day, be paid for with Perkins Funds?

   **Answer:** This is a career exploration activity for 9th graders. A team of Extension Educators plan and implement the day’s workshops and activities so this would be an approvable use of funds.
Equipment

Items purchased with Perkins funds can be disposed of following the school’s own “Accounting Depreciation Procedure for Disposing of School Inventory.” In most cases it means keeping track of the item in their accounting records for 5-7 years. (5 years for a Perkins federal audit.) *The key is the actual value of the equipment now, not the depreciated value.

Equipment $5000 or > each = 700 category Capital Assets
Equipment $4999 or < = 600 category Supplies

A piece of equipment costing $5000+ each but paid partially with other funds than Perkins would be placed under category 600. (The Perkins investment would be less than $5000.) If purchased by a consortium, it remains the property of the consortium and should be available for use by all members within that consortium.

Equipment that is no longer functional and can’t be upgraded or updated essentially has a value of “0”. Keep documentation on file that indicates the item, inventory number and explanation that it has no value and was disposed of on such and such date.

Equipment with a depreciated value of “0” can be sold, however documentation must be on file and the proceeds have to refunded into the CTE program.

NDE’s policy is that we don’t determine the depreciation cycle for equipment. That is left up to the ESU or District. Three years is reasonable for the depreciation cycle for equipment.

Question: Can Perkins funds be used to purchase a portion of equipment over $5000 and the District pays the other portion?

Answer: This is typically not allowable. The concerns include that it would be indeterminate who would be responsible for depreciation, resale, inventory, etc. Equipment purchased by a consortium remains the property of the consortium.

Question: Can a piece of equipment that has been “gently used” be purchased with Perkins funds?

Answer: Used equipment may be procured with Perkins funds, however this is approvable only if industry/commercial grade and has a long time-span for use as in multiple years.
**Equipment-continued**

**Question:** Can “unusual” equipment be purchased such as animal cages/containments to assist in teaching animal care and handling?

**Answer:** Anything purchased needs to follow all the same Perkins guidelines regarding its industry standard/commercial grade, inventorying, labeling and depreciation.

**Question:** Can Perkins be used for commercial equipment that is used to furnish a student-run business?

**Answer:** School-based enterprises expenditures (that fall within the allowable expenditure category; in other words they aren’t on the non-allowable list) are allowable.

**Question:** Can iPads with rotating stands and carrying cases be paid for with Perkins funds?

**Answer:** Entrepreneurship classes and/or school-based enterprise expenditures (that fall within the allowable expenditure category; in other words they aren't on the non-allowable list) are allowable.

Be ready to explain how these materials will be used to improve, modernize or expand CTE for your students.

**Question:** Would a flammable storage cabinet be considered furniture? What about an Eyewear sanitizing cabinet?

**Answer:** The flammable storage cabinet is acceptable even though it is considered furniture. It is a specialty piece of furniture with a specific purpose for CTE for safety in the workshop. It is also has to be industry grade and required by OSHA (even though schools do not fall under OSHA regulations). The other cabinet would not be an allowable expenditure.

**Question:** Can Realty Works or Real Care Babies (Baby Think it Over) be purchased with Perkins funds?

**Answer:** These products are not allowable for a teen parents program. The use of the requested materials must directly relate to the current standards and a FACs Programs of Study course (e.g. Child Development courses in Early Childhood Education and Services). This would be approvable however; the teacher that would be using the materials must attend the training offered by the manufacturer to teach the courses using best practices for the materials. There is typically a fee for this training.
Middle School

Question: Can approvable equipment be bought with Perkins funds that will be housed in a middle-school building: grades 5-8?

Answer: Perkins funds can be used for grades 5-12, so a middle-schools building with 5-8 would still be permissible.

Regarding the middle school program purchases, purchases would be allowable ONLY if they are to modernize, improve, or expand the career and technical education offerings and align them with current industry standards and expectations. They must also be used for a course or courses that enhance instruction for students to gain knowledge and skills that meet industry standards and certifications in high wage, high skill and high demand occupations.

Instructional materials, software, or equipment that is used in hobby, craft, leisure-arts, or other non-occupational, exploration or preparation courses are not approvable for reimbursement.

If the items are for career exploration for a middle school class that specifically addresses health sciences or human services careers (not personal life skills, parenting skills, etc., personal health) then they would be approvable.

Always review items with the middle school teacher(s) with the above criteria in mind. The key is career skills development (not family or personal development) that is aligned to business/industry standards and focus on H3 careers.

Actual expenses may be reimbursed in addition to a stipend if the training or workshop is conducted:

- after school hours;
- weekends;
- during summer break

...
Expense Reimbursements

Travel expenses can only be reimbursed from the grant funds that are in place when the travel occurs. Example: if travel occurs in July, the expenses would be reimbursed from the grant that was awarded July 1.

Even though purchasing tickets before the travel date saves money, they are not reimbursable until they’ve been used. (The travel has to be for CTE centered purposes.)

*Registration fees can be paid out of the current grant and travel expenses from the upcoming grant if the activity occurs relatively soon after the registration.

**Question**: If a teacher works part-time in more than one district under the same consortium, can that teacher be reimbursed for the 2 separate programs?

**Answer**: That decision would fall on the Consortia’s grant manager.

Reimbursing expenditures for Career Education Advisory Board members to the National Career Academy Conference is an allowable expenditure.

Reimbursing a Science teacher to attend a PLTW engineering/science course is allowable.

Programs of Study

**Question**: Can we spend money on a school that won’t open until the following year?

**Answer**: If you are working to improve your CTE programs and systems then this would be like purchasing new curriculum to be used the following year. Instructors would need to work with the materials before actually teaching it. Also make sure the expense are adequately reflect in your current application.

**Question**: Is it OK to expend grant funds for a “Local” program of study?

**Answer**: NDE will need documentation about the career opportunities in order to approve.
**GMS Error Messages**

**Question:** My Review Checklist Tab will not open. I get a message saying my Application Has Been Submitted and that nothing can be added.

**Answer:** It’s probably due to Pop Up Blockers. Go to your Internet Browser’s settings and be sure to have Pop Up Blocker turned “Off”. The review checklist is treated as a pop-up by several internet browsers.

**GMS Error:** Warning: Page has Expired: As a security precaution and to preserve the integrity of your data in this system this page has been expired.

**Answer:** If a session was idle for 30 minutes or more, the session may have timed out. Log In through the Portal and try your request again.

- After closing the browser window, do not reselect the grant application link. If you do you will receive another error (Severity Level 1). You need to Sign Out of GMS and then re-login to continue working.

**GMS Error:** Function Code has been selected on more than one row.  
(Under the Budget Detail Tab)

**Answer:** When adjusting a Goal’s dollar amount under a Function Code, do not repeat a Function Code with the same topic. You may need to “Delete Row” and “Add” a new row with the expenses in order to save the changes.

**GMS Error--Claim for Reimbursement:** Data not saved. Actual Expenditures YTD for Perkins 4700: object code *** since the budgeted amount was not set, YTD amounts are not allowed.

**Answer:** If a budget amount has been set at $0.00, no amounts can be added in the Actual Expenditures column. An amendment may be required in order to move expenditures between object codes before claiming reimbursement.

**Question:** I submitted my application to my district administrator, but realized I need to make a change. Can the Help Desk unlock the application for my changes?

**Answer:** No. When the data entry user submits the application to the district administrator, the DA has two choices under the “Submit” tab; 1: approve, or 2: disapprove. Disapproval will return the application back to the data entry user. The data entry user can now make changes and resubmit.
Grant Award Notifications (GANS) and Purchasing Deadlines

Even though a GAN is dated July 1, grant applicants cannot legally expend funds until the grants are approved. Competitive Grants over $25,000 (reVISION and Innovation) grants are approved at the State Board meetings and in effect on that date. Funds expended before the grant was approved would trigger an audit issue.

**Question:** If I have an invoice with a date of July 15th, is this considered a “Purchase Date” after July 1?

**Answer:** Not necessarily. The Purchase Date is the encumbrance date, or “Purchase Order” date.

**Question:** Can I pay for registration in the current fiscal year’s grant period that is for a conference held in the next year’s grant period?

**Answer:** Yes, IF the conference is scheduled to be held relatively soon after the grant period ended (e.g., in the month of July) and IF the advantages to registering before June 30 are to save significant grant dollars (e.g., Early Bird registration).

**Question:** Grant Year Payments

**Answer:** Allowable obligations prior to June 30th are allowable for claims for that grant year although the payment isn’t processed until July 1 or shortly thereafter.
Student Organizations

Perkins funds cannot be used to provide professional dues for teachers.

Question: Can Perkins funds be used to pay for student fees at CTSO conference or activities?

Answer: No. Funds may not be used for direct benefit to students. Perkins funds cannot be used to provide a “direct benefit” to students.

Question: Can Perkins funds be used for student clothing or uniforms?

Answer: No. This would be a direct benefit to the student.

Question: Can Perkins Funds be used to purchase material related to competitive events in a student organization?

Answer: Depends on the materials. Booklets and sample tests to help prepare students would be an approvable expenditure under the auspice of instructional materials aligned to classroom learning and support of CTSO’s. The competitive event must be aligned to current classroom instruction offered by the district.

Question: Can Perkins Funds be used to cover the costs to send a student or teacher to specific CTE training?

Answer: This would be considered “tuition”. Tuition is an ineligible expenditure since it would be a direct benefit to an individual student.

If the teacher is chaperoning students at a CTE event, these expenses are not allowable.

Question: Can funds be used to transport students to and from college visits or to and from student State Conferences?

Answer: These expenses are not allowable under the stipulation relating to direct assistance to students. However, expenses for students to attend field trips and laboratory activities related to career education instruction is permissible.
Student Organizations—continued

Question: Can the registration fee to a National CTSO conference be paid with Perkins funds?

Answer: No, conference registration fees for Advisors are not allowable. If it is for a student, it is not as this would be a “direct benefit of funds to students.” Other examples of non-approvable expenditures include: bus seats for students to travel to conference, sleeping rooms, and/or activity or admission tickets.

Question: If we are attending SkillsUSA or another CTSO to see what it is all about and possibly start up a chapter, will the grant cover the travel costs?

Answer: No. Basically CTSO’s are an ongoing expenditure that would require maintenance of effort with local funds so it is questionable in terms of Local Plan. It would be better to focus on the professional development of the faculty that would help enhance instruction or establish new/enhanced programs of study.

However, if you’re looking to add a CTE program and need to send a teacher for his/her own professional development, then that may be allowable.
Accountability

Question: If a student fails the class, do we count it? (He receives no credit for the class.) If it is a year-long class such as Accounting, and he fails one of the semesters, he gets $\frac{1}{2}$ credits (5 credit hours). In this case, do I count him as CEFINANC?

Answer: If a student receives no credit then they are not reported. So the first example would be no, do not include. The second example would be yes, do include.

Question: If a student takes a semester long class in CEAGFNRS code and then takes another CEAGFNRS course and also takes the Accounting I class, would he have an additional record with CEFINANC?

Answer: Only once for a specific program code. If the student took the CEAGFNRS course and also takes the Accounting I class, he would have an additional record with CEFINANC.

Question: Can students who were concentrators at the end of their junior year but not counted within the program of study, be counted their senior year? In other words- WHEN do I report a student as a CTE Concentrator?

Answer: Concentrators should be reported when they are in the 12th grade. Each student’s high school course history (transcript) should be examined to see if, at any point in their high school career, he or she met the criteria for becoming a concentrator?

NOTE: If you report a student as a concentrator before he or she is in the 12th grade, Adviser will send you an alert letting you know that NDE will be counting that student as a CTE Participant. You should report this student as a Concentrator again once they reach the 12th grade.

A CONCENTRATOR IS:
A student in grades 9-12 who has completed two (2) or more one semester-long courses within a single career cluster.

Question: Our 8th graders take Computer Applications and then our Freshmen take Information Technology I & II (it’s a graduation requirement). Are all of our students Program Concentrators unless they did not pass or if they transferred in later?

Answer: Concentrators are only determined using courses completed during grades 9-12. So, the 8th grade computer applications course would not be used when determining their highest level of participation when they are in the 12th grade.
Accountability - continued –

**Question:** What do I do if a student Concentrates in multiple areas?

**Answer:** If a student has more than one area of Concentration, the schools have two options: (1) the school can report all areas of concentration for each student using the Programs Fact-Career Ed. Template. NDE will then utilize an internal strategy to determine in which area he or she will be counted (as we only include one area of concentration per student for all accountability measure calculations), or (2) the school can select one area of concentration to report.

**NOTE:** if a school decides to make the decision as to which area of concentration (of multiple) to report for a single student, we suggest that you select the area for which the student has earned the most course credits or completed the most courses.

**Technical Skill Attainment**

**Question:** If a student is reported as concentrating in more than one area, will we need to report technical skill attainment in all areas reported as a concentrator?

**Answer:** Yes, all concentrators should include a technical skill attainment response using the programs fact template categories.

**Question:** How do I record Participants and Concentrators with Dual Credit that do not meet Technical Skill Attainment?

**Answer:** If a student is in a course that is articulated, you would list him as a Career Education Participant with Postsecondary (CE0002) or if he is a senior concentrator (three or more classes within a career cluster) and in an articulated course, he would be listed as a Career Education Concentrator with Postsecondary. However, the school defines Technical Skill Attainment (Grade B or better; industry credential; etc.) if a dual credit student does not meet TSA, he would still be listed as “With Postsecondary” but “Not Met” Technical Skill Attainment.
Accountability - continued –

**Question:** Our Participants were inadvertently entered with Technical Skill Attainment. Will this cause a problem with our data?

**Answer:** For Perkins Accountability purposes, 2S1 Technical Skill Attainment is calculated as a *ratio* of the Concentrators meeting technical skill attainment, so leaving the records unchanged should not be a problem.

**Note:** Leaving the data unchanged will not make a difference, however if changes are made, the records need to be deleted and reentered. Changes do not overwrite previous data and will cause duplicated records.

**Question:** If a senior transferred into our school in his junior year, do we count any classes taken at the former high school that fit in the coded areas?

**Answer:** Yes, counting credits is established in Rule 18 where the process would be if the student moved from one accredited schools to another. The credits are evaluated and accepted based upon an evaluation of the courses that match.

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**Career Academies**

How do you code students who are in a Rule 47 State Approved Career Academy?

First, determine appropriate course codes based on the Nebraska Department of Education Course Standards.

Only Rule 47 State Approved career academy courses may be included.

Programs “called” career academy but not Rule 47 approved may NOT be counted.

Next, use the Student Grades template [Student Grades: Course Delivery Model (42)] to record and identify the Career Academy approved courses.
Accountability - continued –

**Question:** If we have a student who transfers out in February and has received credit for a Career Ed class at semester--do we include them? Is there a cutoff date? Or do we only list those who are at our school on the last day of classes?

**Answer:** We recommend that you report the student as a participant only. At the state level, we will be able to unduplicate the student count if the transferring district reported them as a participant or a concentrator, but by only reporting as a participant your district won’t have to report them as not graduating, missing a full academic year, etc., that would potentially impact your performance measures.

**Question:** What is the difference between secondary completion and the graduation rate?

**Answer:** Secondary completion measures the number of concentrators that completed high school with a diploma, certificate or passing the GED. The graduation rate measure is the calculation used to determine the graduation rate for AYP/NCLB reporting.

**Question:** Do we count students as single parents before their child is born?

**Answer:** If the child is not yet born, you only count the mother as a single parent. After the child is born and if the father has joint custody of that child, you would count both students as single parents.

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**Special Populations Strategies/Best Practices**

- Establishing or refining non-discrimination policies/procedures
- Implementing strategies to overcome program enrollment and completion barriers
- Redesigning programs to enable attainment of “Core Indicators of Performance”
- Making modifications to curriculum or equipment
- Employing classified/supportive personnel/aides
- Expanding/aligning student services (assessment, counseling, financial aid, job placement)
Accountability-continued –

**Question:** If our district does not participate in Perkins at all either because of not having approved programs of study or declining the access to funds, do we have to report CTE data in the Programs Facts?

**Answer:** No, a nonparticipating district does not have to report data on participants or concentrators.

**Question:** Our district did not directly spend Perkins funds on middle school career education this year. Do we have to report participants at the 7th and 8th grade levels?

**Answer:** The use of Perkins funds within a school district does require reporting of students participating and concentrating in areas of career and technical education grades 7-12 if career education is offered to students at these levels. The annual use of funds does not narrow the focus of the student population to be counted as participants if career education offerings are provided.
Due Dates and Data Changes

Question: With the Due Dates are Due Dates rule, can data still be changed or submitted past the deadline due to extenuating circumstances?

Answer: All requests must be sent through the NDE Portal.

Instructions: Log into the NDE Portal. Under the “Data Collection” tab, select “Consolidated Data Collection” (CDC).

Click on REQUEST TO SUBMIT DATA LATE OR MAKE DATA CHANGES link.

Follow prompts for contact information.

A button appears CLICK TO SUBMIT REQUEST.

REQUESTS FORM opens. Select the Type of Data Collection. Select the school year. Select the collection in the dropdown box. Complete the template of what is needed to submit or what updates need to be made.

Indicate the reason for the request. Provide detailed information on why data was late or needs changing. Only requests with legitimate extenuating circumstances will be reviewed (e.g. illness, death, fire, flood, computer failure, etc.)

When finished, click on the “Submit Request” button.

You will receive an email from NDE confirming the request was received.

Requests are reviewed each Tuesday afternoon by the NSSRS Executive Committee with a final decision by the Deputy Commissioner.

If the request is approved, NDE Helpdesk staff will contact you to make the necessary changes.
Record Keeping/Time and Effort

**Question:** How many years of records do schools need to keep? How many years of records do Consortia need to keep?

**Answer:** For stand-alones, the local district’s depreciation schedule and disposal policies apply. NDE recommends five years from the end date of when the final expenditure report is received. For example, the July 1, 2015 to June 30, 2016 grant year’s final expenditure report should be received by October 1, 2016. The retention date would then be 5 years from that date or October 1, 2021.

Time and Effort Support—All Federal Grants

Code of Federal Regulations (CFR) requires an employee whose salary and wages are supported, in whole or in part with Federal funds to document his/her time spent working on Federal programs in order to ensure charges to each Federal program reflect an accurate account of the employee’s time and effort devoted to that program. The CFR addresses two types of documentation: semiannual certifications and personnel activity reports.

All Federal grants (IDEA, Title, Perkins, Homeless, Migrant, Early Childhood, etc.) that claim salaries/wages for reimbursement are required to have time and effort logs with their final submission. Failure to comply with this regulation is non-compliance with Federal grant requirements and can result in the funding required to be returned. When the school districts and ESU’s applied for these funds you also agreed to comply with the Federal regulations that goes with these types of funds.

**Question:** There is a Federal requirement for submitting Time and Effort log sheets to NDE. What exactly does NDE require for records?

**Answer:** The easiest thing to remember to submit is a sample of what was sent to the Payroll Office for coding and payment against the grant.
## Time and Effort Samples

### Time and Effort Log Sample

**List Specific Funding Sources Below**

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<th>Month/Year:</th>
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**Employee:** Jane Doe  
**Position:** Instructional Assistant  
**School:** Lincoln Elementary

**Certification Period:**  
8/15/2012 to 2/15/2013

**Type of Schedule:**
- Daily
- Weekly
- Monthly
- Other:  

**Program or Cost Objective** | **Distribution of Time**
--- | ---
Title I, Part A – Improving the Academic Achievement of the Disadvantaged | 65%
IDEA, Part B – Federal Special Education | 15%
State or Local | 20%

**TOTAL** | **100%**

I certify that I performed work consistent with the attached schedule and as distributed in the above percentages during the Certification Period.

**Jane Doe**  
**Employee Signature**  
**2/28/2013**  
**Date**

I certify that I have firsthand knowledge that the above employee performed work consistent with the attached schedule and as distributed in the above percentages during the Certification Period.

**Mary Smith**  
**Supervisor Signature**  
**2/28/2013**  
**Date**

---

**Time and Effort Samples** • 29
Record Keeping/Time and Effort—continued

Question: If a coordinator is paid from both a Perkins grant and SCC funds, can they just use the semi-annual certification form if it is all for one objective?

Answer: That is correct.

Question: If the coordinator is paid via two different grants (Perkins basic and postsecondary) would they just use the semi-annual certification form for the one objective?

Answer: That is correct.

Question: If a coordinator is paid from both a Perkins grant and District/LEA funds, can they just use the semi-annual certification form if it is all for one objective?

Answer: That is correct.

Question: And if it includes non-Perkins related time, they would need to complete time logs for their Perkins time, correct?

Answer: That is also correct.

Question: If the coordinator is paid via two different grants (Perkins basic and post-secondary), would they just use the Semi-annual certification form for the one objective?

Answer: As long as 100% of their time could be paid out of either grant. If not, they would need to complete a time log documenting their work specific to each grant.

Question: We were given the impression that we are only required to provide what the contract states. In looking at the contract, it doesn't specifically reference time logs, but mentions providing supporting documentation and meeting the requirements of the approved Perkins plans. We just want to be sure we are in compliance.

Answer: Supporting documentation would have to comply with 2 CFR 200 Subpart E-Cost Principles. Time logs are not specifically required, but is the NDE recommended practice to ensure you are in compliance with Federal regulations. If there is doubt in the level of documentation, there could be potential return of grant funds per the Terms and Conditions of Award on the Grant Award Notification in the Grants Management System.
Code of Federal Regulations (CFR)

*Any payment must not be for time worked during regular contract, non-grant time.

The Code of Federal Regulations (CFR) requires an employee whose salary and wages are supported, in whole or in part, with Federal funds to document his/her time spent working on Federal programs in order to ensure charges to each Federal program reflect an accurate account of the employee’s time and effort devoted to that program. The CFR addresses two types of documentation: semiannual certifications and personnel activity reports.

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Time and Effort logs must be supported within the Staff Reporting system using the appropriate instructional SPI Code-Position Assignment. The deadline for the update is June 30.
DO NOT BUY
non-innovative/non-industrial standard/supplies/outside of EDGAR 2CFR

6th grade and younger CTE programs materials
Advertising
Airplanes
Automobiles
Awards/Medals/Pins/Plaques/Ribbons
Banners
Boats
Buildings
Buses
Certification test costs
Childcare
Chisels
Chromebooks
Clamps
CO2 cartridges
Conference Expenses-Non CTE-focused
Coveralls
Cups/glasses
Dishes
Dishwashers
Drill bits
Dual-Credit tuition
Dues (student or advisor)
Electric ranges (Low end, coil burner)
Embroidery machines (unless industry grade and tied directly to a school-based enterprise)
Entertainment or related to entertainment (Meals/Snacks are considered entertainment unless a working lunch.)
Equipment Insurance
Equipment (that is mounted or becomes a part of a building or structure)
Equipment not housed in a CTE classroom or lab
Flatware
Folders or bags
Food
Food containers
Food dehydrators (unless they are industry-grade for a Food Science course)
Furniture
Gardening tools
Gifts (of any kind)

Gloves (Safety or Kitchen)
Glue
Goggles
Golf carts
Gratuities
Greenhouses
Hammers
Hand saws
Home party-Private label products sold through outlets
Ink
Instructional Materials (one use only)
Instructional Materials (retained by the student)
Insurance
Intercontinental Travel
Jackets
Key chains
Lab coats
Land
Levels
Lodging for Students
Lumber
Markers
Medals/Awards/Pins/Plaques/Ribbons
Motorcycles
Notepads
Paper
Pens/Pencils
Pins/Plaques/Ribbons/Medals/Awards
Planes
Plants
Plaques/Ribbons/Medals/Awards/Pins
Plastic products-light-grade
Pliers
Potting soil
Pressure canners
Printer cartridges
Public Relations Costs
Punches
Quilting machines
Rasps
Real Care Infant Simulators
Replacement batteries
Ribbons/Medals/Awards/Pins/Plaques
Safety glasses/goggles
Salt and Pepper shakers
Scholarships
Screwdrivers
Shears
Software such as Striv, Wirecast Pro or other software used for videography
Spatulas
Storage files or cabinets
Student Organization “Start-up” kits
Strengths Finders Assessments for individuals
Structures (buildings or additions that are part of the permanent structure)
Tape measures
Tests
Textbooks (unless for a new program)
Thank-you notes
Toner
Tools
Tools or equipment retained by students
Tractors
Trailers
Transportation
Trouble lights
Trucks
T-shirts
Tuition
Uniforms or any clothing
Vise grips
Washers/dryers
Welding Helmets may be approvable if Industry Grade Standard
Welding gloves/jackets
Welding rods/wire
Whisks
Whiteboards individualized for students
Workbooks
Work Keys Assessments for individuals
Wrenches