



BILL HASLAM
GOVERNOR

STATE OF TENNESSEE
DEPARTMENT OF EDUCATION
NINTH FLOOR, ANDREW JOHNSON TOWER
710 JAMES ROBERTSON PARKWAY
NASHVILLE, TN 37243-0375

CANDICE MCQUEEN
COMMISSIONER

MEMORANDUM

TO: CTE Directors

FROM: Danielle Mezera, assistant commissioner, division of college, career, and technical education

DATE: July 23, 2015

SUBJECT: State Policy Changes Regarding Utilization of Carl Perkins IV Funds

In accordance with the Uniform Grants Guidance (2 C.F.R. Part 200) that went into effect on July 1 for all U.S. Department of Education (USED) State Administered Grants, such as the Carl D. Perkins Career and Technical Education Act of 2006, we are adjusting our state policies to ensure compliance. As we adjust our policies, it is important to remember the issue of supplanting. Whenever an eligible recipient uses federal funds to pay for the same activity for which it used non-federal funds the prior year, it will raise a presumption of unlawful supplanting. Please keep this definition in mind.

Pre-Award Risk Assessment

- Under the new Uniform Grants Guidance, recipients of grant funds can impose additional specific conditions as needed as outlined in 2 C.F.R. 200.207. Indicators for conditions to grant awards include audit findings, waste abuse and fraud findings, and timeliness of drawing down Perkins funding. Conditions can include meeting quarterly with regional fiscal representatives and/or CTE CORE consultants, attendance at state sponsored meetings/trainings, or other conditions as necessary.

Risk-Based Monitoring

- Under the new Uniform Grants Guidance, monitoring of federal grants must be done on an at-risk basis. Therefore, our traditional cadence of four year monitoring of all LEAs will no longer be in effect. Instead, the division has identified key risk factors for monitoring LEAs. If an LEA is above the cut score, then that LEA will be scheduled for a full monitoring visit. LEAs will be notified in the summer for the fall monitoring.
- Those LEAs who had already been scheduled for monitoring for this fall based on the previous schedule will still have a visit from their CORE consultant to review their program. This lighter version of monitoring will only be in place for this year.



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Food for Meetings or Conferences

- In a recent Memorandum to Grantees, USED has advised that a grantee hosting a meeting or conference **may not** use grant funds to pay for food for attendances unless doing so is necessary to accomplish legitimate meeting or conference business.
 - A working lunch is an example of a cost for food that might be allowable under a federal grant if attendance at the lunch is needed to ensure the full participation in essential discussions and speeches concerning the purpose of the conference and to achieve the goals and objectives of the project.

CTSO Travel

- USED's Office of Career, Technical, and Adult Education sent out Non-Regulatory Guidance -Version 3.0 in 2009. Section D.26 stated that Perkins funds could not be used for CTSO travel except under limited circumstances: "an eligible recipient could use Perkins IV funds for transportation to, and lodging and meals at, a technical skills competition at a national CTSO convention for students who are members of special populations".
- However, it is the division's interpretation that these costs are "(1) related to a CTSO that is an integral part of curriculum, and (2) part of a larger program to serve special populations or non-traditional students" and **are allowable** for all CTSO student travel. Indicator 9 of the Quality Program Indicators (QPIs) requires that "programs have a Career and Technical Student Organization (CTSO) as a support for the instruction program," which is demonstrated by integration of CTSO leadership skills and activities in all classes and classrooms, schools, and/or community based competitions.

Consumables

- When purchasing new equipment with Carl Perkins IV funds, consumables associated with the purchase of that equipment can be purchased to ensure full utilization of new equipment.
- Subsequent purchases of consumables may be allowed in rare incidences if these purchases will increase student success and for school systems with limited resources of no more than \$25,000 in total annual allocations.
 - Systems meeting these requirements must submit a request stating the specific consumables and purchase amount to the CTE CORE consultant for approval.