

Career and Technical Education

PERKINS V OPERATIONAL HANDBOOK

A reference guide for administering the
*Strengthening Career and Technical Education
for the 21st Century Act (Perkins V)*



MINNESOTA STATE
Career and Technical Education



DEPARTMENT
OF EDUCATION

ADMINISTRATION OF THE PERKINS V FEDERAL GRANT

The Minnesota State Colleges and Universities (Minnesota State) Board of Trustees is the sole state agency authorized to receive and disburse federal funds and to supervise the administration of the state Career and Technical Education (CTE) programs through the Minnesota State System Office under a state plan developed jointly with the Minnesota Department of Education (MDE) pursuant to Minnesota Statute § 136F.79 and the Strengthening CTE for the 21st Century Act (Public Law 115-224 known as Perkins V). The System Office negotiates the level of responsibility for the administration, operation, and supervision of this Act at the secondary level with MDE's Office of Career and College Success, except for those responsibilities specifically reserved to Minnesota State by section 121(a) of the Act.

As the sole state agency, Minnesota State administers the Perkins V basic federal grant through a formula/non-

competitive grant process and the full allocations in accordance with the federally approved state plan. Staff from Minnesota State and MDE are responsible for the distribution and management of the federal grant to recipients. Grantees for these federal funds are from Minnesota State's community and technical colleges and Minnesota public school districts.

Sources:

(Perkins V) Strengthening Career and Technical Education for the 21st Century Act — *full text is available at* https://s3.amazonaws.com/PCRN/uploads/perkins_v.pdf.

Minnesota State Plan—*when completed and approved, full text of the Minnesota State Plan will be available at* https://www.minnstate.edu/system/cte/MN_State_Plan/index.html.

Primary Administrative Contacts

Jeralyn Jargo

State Director for Career and Technical Education
Workforce Development

Minnesota State (Sole State Agency)

30 7th Street East, Suite 350
St. Paul, MN 55101-7804
www.minnstate.edu/system/cte



Michelle Kamenov

Supervisor, Career Development and CTE
Office of Career and College Success

Minnesota Department of Education

1500 Highway 36 West
Roseville, MN 55113
www.education.state.mn.us



ACKNOWLEDGEMENTS

Thank you to the CTE staff from the Minnesota State System Office, MDE, and the other partners who contributed, commented, and reviewed this operational handbook.

@2019 Minnesota State and Minnesota Department of Education

The contents of this publication were made possible through the *Strengthening Career and Technical Education for the 21st Century Act* federal grant from the United States Department of Education administered through Minnesota State Colleges and Universities. Content does not necessarily represent United States Department of Education policy.

Minnesota State and Minnesota Department of Education are affirmative action, equal opportunity employers and educators.

This document is available in alternative formats to individuals with disabilities. To request an alternate format, contact Human Resources at 651-201-1664. Individuals with hearing or speech disabilities may contact us via their preferred Telecommunications Relay Service.

TABLE OF CONTENTS

ADMINISTRATION OF THE PERKINS V FEDERAL GRANT	2
Primary Administrative Contacts	2
ACKNOWLEDGMENTS	2
PURPOSE OF THE HANDBOOK	7
What’s New?	7
What’s Changed?	7
THE STRENGTHENING CAREER AND TECHNICAL EDUCATION FOR THE 21ST CENTURY ACT (PERKINS V)	8
Purpose of the Act	8
Title I—Career and Technical Education Assistance to the States (the Basic Grant)	8
Title II—General Provisions	9
Title III—Amendments to Other Laws	9
PROGRAM PLANNING AND OPERATION	9
Perkins V Program Overview	9
MINNESOTA PERKINS MODEL	10
State Governance	10
Formation of the Perkins Career and Technical Education Consortium Model.....	10
Responsibilities of Perkins State Leadership	10
Statewide Communication and Engagement	10
Consortium Governance	11
Consortium Membership Requirements.....	11
Consortium Governance Structure.....	11
Procedure for Changing Consortium Membership	12
Roles and Responsibilities of Perkins Consortium Coordinators NEW	12
HIGH QUALITY CTE PROGRAMMING	13
State-recognized Programs of Study NEW	13
CTE Program Approval and Review	13
Postsecondary Approval and Review.....	13
Secondary MDE Program Approval and Review.....	14
Secondary Connections to Funding Sources	15
THE LOCAL APPLICATION	16
Local Application Process NEW	16
Submission of the Local Application	16
Application Components	16
Narrative	16
Comprehensive Local Needs Assessment (CLNA) Framework NEW	16
Secondary Supplemental Budget	17
Perkins Funded Positions and Coordination Time for the Grant.....	17
Improvement Plans.....	17

State-recognized Programs of Study.....	17
Statement of Assurances and Certifications.....	17
Local Application Approval Process	18
Implementation of the Plan	18
Annual Performance Report.....	18
Reporting Timeline NEW	18
ACCOUNTABILITY, REPORTING AND CTE DATA	19
Perkins and Core Performance Indicator Definitions NEW	19
Proposed Secondary CTE Definitions	19
Proposed Secondary Core Accountability Indicator Definitions	19
Proposed Postsecondary CTE Definitions.....	20
Proposed Postsecondary Core Accountability Indicator Definitions.....	20
State-Determined and Local Levels of Performance	20
State-Determined Levels of Performance	20
Local Levels of Performance	20
State Consolidated Annual Report.....	21
Local Performance Improvement Plan	21
CTE Accountability and Reporting Data–Secondary.....	21
Secondary Data Collection Overview: Submitting a P-File (Perkins data).....	21
Secondary Data Collection Overview: Data Verification Process.....	22
Secondary Data Sources	22
Secondary Accountability and Reporting Data.....	22
Accessing Secondary Perkins Accountability and Reporting Data	23
Secondary Perkins Accountability and CTE Data - Useful Links.....	23
CTE Accountability and Reporting Data – Postsecondary.....	23
Proposed Postsecondary Data Structure – Entry Cohorts.....	23
Postsecondary Accountability and Reporting Data	23
Proposed Postsecondary Data Sources	24
Accessing Postsecondary Perkins Accountability and Reporting Data.....	24
Postsecondary Perkins Accountability and CTE Data – Useful Links	24
Student Data Privacy	24
Access to Private Data.....	24
Data Use and Reporting.....	24
Computer and Software Requirements.....	25
Student Data Privacy Resources	25
PERKINS FUNDING	26
Formula Distribution	26
Consortia Basic Allocation	26
Consortia Reserve Allocation.....	26
State Leadership Funds.....	27
State Administration Funds	27
FINANCIAL REQUIREMENTS	28
Requirements for Local Uses of Funds.....	28
Algorithm for Making Local Funding Decisions NEW	28
Size, Scope, and Quality NEW	29
Allowable and Unallowable Uses of Funds NEW	29
Allowable Uses of Funds.....	29
Unallowable Uses of Funds.....	30

Additional Fund Usage Guidelines.....	30
Funds for Support Services (Nontraditional by Gender)	30
Using Perkins V Resources to Fund Personnel.....	30
Using Perkins V Resources to Fund Postsecondary Perkins Programs.....	31
Postsecondary Customized Training Courses and Programs.....	31
Field Trips and Student Transport Activities	31
Career and Technical Student Organization (CTSO) Activities.....	31
Career Development License and Activities	31
Perkins V – 5 Percent Administrative Cost Allowances	31
Fiscal Year Expenditure Timelines.....	31
Local Application Budget Changes within the Fiscal Year.....	31
Postsecondary Budget Changes.....	31
Secondary Budget Changes	32
Capital Assets (Equipment).....	32
Requirements for Purchasing Equipment with Federal Grant Funds.....	32
Postsecondary Equipment Documentation	32
Secondary Equipment and Curriculum Funding Criteria	33
Criteria for Secondary Perkins Funded Purchases.....	33
Requirements for State Pre-Approval of Secondary Equipment Purchases	33
Secondary Equipment and Curriculum Purchases-Grant Management.....	33
Inventory Control Requirements for Secondary Equipment and Curriculum Purchased through Perkins Grant Funding.....	34
Disposal of Equipment/Curriculum Purchased Through the Secondary Perkins Grant.....	34
Perkins Funding for Curriculum Software/License	34
Perkins V Finance Cost Centers (Minnesota State).....	34
Part 1: Federal Requirements	34
Part 2: Types of categories.....	34
Part 3: Fiscal Year Expenditure Timelines	35
Part 4: Expenditure Reimbursement Process (Draws)	36
SERVS Financial System at MDE.....	36
WorkForce (CareerForce) Center Collaboration Expenditures.....	36
MONITORING	37
Minnesota’s Perkins V Monitoring Process.....	37
Purpose	37
Objectives for Perkins Monitoring.....	37
Implementation priorities to be examined during 2019-2024	37
Guiding Questions to be Addressed	37
Local Consortium Monitoring Guidelines.....	37
Selection of Sites to be Monitored	37
Risk Assessment Tool	37
Program Performance.....	37
Fiscal Analysis.....	38
Data Reporting	38
Other Factors	38
Types and Levels of Monitoring.....	38
Minnesota Criteria and Sources of Evidence for Monitoring 2019-2024	38
Structure of Monitoring Visits	38
Fiscal Desk Audit	40
Secondary and Postsecondary Desk Audit Process.....	40
Fiscal Audit Criteria	40

OFFICE OF CIVIL RIGHTS REVIEWS41

Postsecondary41

Secondary41

Purpose of Reviews41

RETENTION OF PERKINS V GRANT RECORDS41

POLICIES42

Minnesota State System Office.....42

 Minnesota State Procurement 42

 Minnesota State Travel 42

 Conflict of Interest 42

 Minnesota State Gratuity..... 42

 Minnesota State Inventory Controls..... 42

 Minnesota State Cash Management 42

 Minnesota State Code of Conduct..... 42

 Minnesota State Advisory Committees 42

 Minnesota State Grant Management..... 42

Minnesota Department of Education42

 MDE Cash Management 42

 MDE Allowable Cost..... 42

 State Match Requirements 42

CTE DIRECTORY43

Minnesota State System Office Staff.....43

Minnesota Department of Education Staff43

APPENDIX A: MONITORING VISIT SAMPLE AGENDA.....44

APPENDIX B: CONSORTIA REPORTING TIMELINE NEW45

APPENDIX C: ASSET TAG EXAMPLE45

APPENDIX D: EXAMPLE OF A MINI GRANT FORM46

PURPOSE OF THE HANDBOOK

This handbook is a resource for secondary and postsecondary eligible recipients—Minnesota Department of Education (MDE) and Minnesota State* respectively— who will be submitting applications for funding under the *Strengthening Career and Technical Education for the 21st Century Act* (Perkins V).

The purpose of this handbook is to provide an understanding of federal and state requirements and guidance developed for CTE programs benefiting from Perkins funding. This handbook highlights specific sections of the Perkins V Act that are critical for understanding the requirements of the Act for implementation in Minnesota.

What's New?

To reflect the changes in Perkins V and make this handbook easier to use, it has been extensively rewritten and reorganized. For those of you who are familiar with the Perkins IV Operational Handbook, here's an overview of what's been added:

A circular orange badge with the word "NEW!" in white, bold, uppercase letters.

- New vision, mission, principles, and strategic directions for CTE in Minnesota, (page 9)
- Guidance on State-recognized Programs of Study (page 13)
- Information on Comprehensive Local Needs Assessment (page 16)
- Beginning in 2020, due dates for local applications and Annual Performance Reports (APR) will be May 1 and Oct 1, respectively (pages 18)
- Proposed Core Accountability Indicators (page 19)
- Algorithm for making local funding decisions (page 28)
- Descriptions of size, scope, and quality (page 28)

What's Changed?

We've moved the glossary of definitions and list of acronyms to https://www.minnstate.edu/system/cte/consortium_resources/index.html where they can more easily be kept current. This also reduces the number of pages to be printed, resulting in substantial cost savings.

** While "Minnesota State Colleges and Universities" remains the legal name of the system, it should only be used by the Board of Trustees, by member institutions for ceremonial documents, and as a first reference in contracts and legal documents. For all other instances, and upon second reference in contracts and legal documents, use "Minnesota State." In this handbook, "System Office" may be used when referring to the Minnesota State System Office. (Source: Minnesota State Brand Identity Guide, 2017)*

THE STRENGTHENING CAREER AND TECHNICAL EDUCATION FOR THE 21ST CENTURY ACT (PERKINS V)

The *Strengthening Career and Technical Education for the 21st Century Act* (Perkins V) amends the Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV). The new act was signed into law July 31, 2018 and went into effect July 1, 2019. For the sake of brevity, throughout this handbook the *Strengthening Career and Technical Education for the 21st Century Act* will be referred to as Perkins V.

Some provisions of Perkins V will go into effect for the 2019-2020 school year, which will serve as a transition year for the new law. Full implementation will begin the following year for the 2020-2021 school year.

The reauthorization process was driven largely by a desire to ensure that students are prepared for 21st-century careers. This framing led to a workforce development focus throughout Perkins V with an emphasis on encouraging and incentivizing innovation within career and technical education.

Purpose of the Act

The purpose of the Perkins V Act is to develop more fully the academic knowledge, technical skills, and employability of secondary and postsecondary education students who elect to enroll in CTE programs and programs of study, by:

1. Building on the efforts of States and localities to develop challenging academic and technical standards and to assist students in meeting such standards, including preparation for high-skill, high-wage, or in-demand occupations in current or emerging professions.
2. Promoting the development of services and activities that integrate rigorous, challenging academic and career and technical instruction that link to secondary and postsecondary education for participating CTE students.
3. Increasing State and local flexibility in providing services and activities designed to develop, implement, and improve career and technical education.
4. Conducting and disseminating national research and disseminating information on best practices that improve career and technical education programs of study, services, and activities.
5. Providing technical assistance that (A) promotes leadership, initial preparation, and professional development at the State and local levels; and (B) improves the quality of Career and Technical Education teachers, faculty, administrators, and counselors.
6. Supporting partnerships among secondary schools, postsecondary institutions, baccalaureate degree-granting institutions, area CTE schools, local workforce investment boards, business and industry, and intermediaries.
7. 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 United States competitive.
8. Increasing the employment opportunities for populations who are chronically unemployed or underemployed, including individuals with disabilities, individuals from economically disadvantaged families, out-of-workforce individuals, youth who are in (or have aged out of) the foster care system, and homeless individuals. (New in Perkins V.)

For more information about the purpose of the Act, see The Strengthening CTE for the 21st Century Act, Section 2.

Title I—Career and Technical Education Assistance to the States (the Basic Grant)

The Perkins V Act provides financial support for innovation and program improvement in CTE at both secondary and postsecondary levels.

Title I of the Act outlines the structure and requirements related to the Basic Grant under Perkins V. The Act specifies the formula to be used for the allotment and distribution of funds to states, as well as requirements for how states distribute

Table 1: Selected provisions related to the basic grant Title II—General Provisions

Perkins V – Title I: Selected Provisions Related to the Basic Grant

Financial Provisions	Distribution of Funds	
	Section 111	Reservations and State Allotment
	Section 112	Within-State Allocation
	Section 131	Distribution of Funds to Secondary Education Programs
	Section 132	Distribution of Funds for Postsecondary Education Programs
	Section 133	Special Rules for Career Technical Education
	Use of Funds	
	Section 124	State Leadership Activities
	Section 135	Local Uses of Funds
Plans	Section 122	State Plan
	Section 134	Local Application for CTE Programs
Accountability	Section 113	Accountability
		State and Local Levels of Performance
		State and Local Reports (including disaggregated data)
Improvement Plans	Section 123	Improvement Plans
		State, Local Program Improvement

Perkins V funds to local eligible agencies. In addition, the Act specifies uses of funds by both state and local recipients. Perkins V legislation includes several requirements related to reporting and accountability, with many of the state-level requirements having parallel provisions for local recipients. These requirements include submission of applications and performance reports at both the state and local level. There is a requirement that both state and local recipients submit improvement plans if the agreed-upon, state-determined performance measures are not met. (See Table 1.)

Title II—General Provisions

Title II of the Perkins V Act refers to federal and state administrative provisions. Section 211 (Fiscal Requirements)

states that federal Perkins funds must be used to “supplement not supplant;” funds cannot replace state and local dollars that are being used for CTE activities.

Title II also includes a maintenance of effort provision requiring that state funding for CTE remain at least at the same level as the previous year.

Title III—Amendments to Other Laws

Title III of the Perkins V Act includes Section 301 (Amendments to the Wagner-Peyser Act), Section 302 (Amendments to the Elementary and Secondary Education Act of 1965), and Section 303 (Amendments to the Workforce Innovation and Opportunity Act).

PROGRAM PLANNING AND OPERATION

Perkins V Program Overview

In November 2018, a working group consisting of Minnesota State and MDE staff, Minnesota Association for Career and Technical Education (MNACTE), Minnesota Association for Career and Technical Administrators (MACTA) representatives, and selected consortia leaders developed a new vision, mission, and strategic directions for CTE in Minnesota.

Minnesota’s four-year Perkins V State Plan incorporates this guidance and provides direction for use of funds in secondary, postsecondary, and adult education programs.

Minnesota’s New Vision for CTE

Advancing career and technical education empowers every learner to realize a rewarding career.



NEW!

Mission

Quality career and technical education ensures every learner has equitable access to career-connected learning through a network of knowledgeable partners.

Principles

We are committed to ensuring:

- An equity lens for decision making
- Inclusion of all stakeholders
- Being bold, innovative, and focused on continuous improvement
- Responsiveness to the evolving labor market

Strategic Directions

The following strategic directions provide a clear path forward for CTE in Minnesota. Each of the strategic directions listed below features subcategories that fall within the scope of that item.

Advancing Career and Technical Education

- Comprehensive Local Needs Assessment
- Accountability
- Outreach
- Awareness and communication

Career-Connected Learning

- Career Pathways
 - Programs of Study
- Career Preparation
 - Work-based Learning

Integrated Network

- Business and industry
- State and federal programs; state agencies
- Educational partners
- Consortia/Minnesota State/MDE

Equity and Inclusion

- Service partnerships
- Providing resources
- Data/data management

Knowledgeable Experts

- Professional development/technical assistance
- Licensure preparation programs
- Mentor/mentee relationships
- Consortia leadership

MINNESOTA PERKINS MODEL

State Governance

Formation of the Perkins Career and Technical Education Consortium Model

Minnesota's school districts and the two-year colleges of Minnesota State were self-formed into twenty-six Perkins Consortia in 2008 to promote collaborative planning and implementation of CTE programs within their regions. In identifying initial membership in the state's Perkins consortia, CTE leaders were asked to consider the following for their regions of the state:

- CTE program improvement
- Anticipated Programs of Study
- Dual and concurrent enrollment opportunities
- Collaborative history and culture
- High school to college matriculation patterns
- Geography
- An operating structure that gives special attention to capitalizing on the strengths of the existing basic grant and tech prep leadership
- Continuation of effective collaborative activities that promote high school to college transition
- A decision-making model that would equitably and effectively address CTE programming

The consortium model will continue under Perkins V. CTE state leaders at Minnesota State and Minnesota Department of Education (MDE) reserve the right to approve the final membership of any Perkins consortium to ensure that no eligible college or any eligible school district is excluded.

Responsibilities of Perkins State Leadership

Ten percent of the federal Perkins grant funds received by the state are used to conduct state leadership activities to improve CTE. Section 124 of Perkins V specifies how states will undertake these responsibilities. States are required to provide support for:

- Preparation for non-traditional fields in current and emerging professions, programs for special populations, and other activities that expose students, including special populations, to high-skill, high-wage, and in-demand occupations
- Individuals in state correctional institutions, juvenile justice facilities, and educational institutions that serve individuals with disabilities
- Recruiting, preparing, or retaining CTE teachers, faculty, specialized instructional support personnel, or paraprofessionals
- Technical assistance for eligible recipients

States are also required to report on the effectiveness of use of funds to achieve:

- The state's strategic vision and goals for preparing

an educated and skilled workforce (including special populations) and for meeting the skilled workforce needs of employers

- State-determined levels of performance
- Reductions in disparities or performance gaps

In addition to these responsibilities, Minnesota State and MDE promote development of high-quality programs of study and provide professional development and technical assistance to consortia as required on a wide range of Perkins-related topics. State staff ensure fund-use effectiveness through a consortia monitoring process described later in this handbook.

Professional development for and by Minnesota CTE professionals is comprehensive, sustained, and multifaceted. It includes resources designed to support administration of the Perkins V grant and improve postsecondary and secondary educators' and workforce professionals' effectiveness in increasing student success.

Professional development is delivered through relevant and timely methods and media, including, but not limited to, webinars, conferences, multimedia sessions, trainings, written materials, workshops, and courses. State staff also produce an annual webinar series for consortia members to address questions about Perkins fiscal and accountability practices and to orient new consortia coordinators.

The two prominent professional development events offered by CTE staff each year are the annual Consortia Coordinators' Meeting and the CTE Works! Summit:

- The Consortia Coordinators' Meeting is an invitation-only, day-long workshop for Minnesota CTE consortia leaders to meet with each other and share promising practices for administering the Perkins grant and managing consortia
- The CTE Works! Summit is a 1.5-day professional conference open to 475 secondary, postsecondary, workforce, community, and industry partners supporting all aspects of CTE and career pathways from across Minnesota and neighboring states

Find out more at: <https://www.minnstate.edu/system/cte/professionaldevelopment/index.html>.

Statewide Communication and Engagement

Minnesota State and MDE are fully committed to working with educators and administrators to increase awareness and understanding of CTE through public relations, marketing, and professional communications to stakeholders.

Minnesota State and MDE serve as strategic partners with other secondary and postsecondary educators, as well as with

business and industry leaders, to strengthen our commitment to student success from high school to college and beyond. Partnerships include regional and state activities that promote development of career pathways, strengthen teacher preparation programs, explore experiential learning and employer engagement opportunities, and support success for youth and adults from underrepresented populations.

Minnesota State and MDE provide communications in a variety of media for internal and external partners, as well as stakeholders. The best communication inspires and motivates people, helps them take effective action, and removes obstacles to understanding. Cross-communication is highly encouraged between state staff and consortium leaders.

The preferred formal communication method for requesting and exchanging information between state staff and consortium leaders is email.

Each consortium in Minnesota has identified a postsecondary and secondary consortium leader who is the primary contact for the administration of the grant in each consortium. In some consortia, this may be two or more people per consortium.

Formal communication typically revolves around the following requirements:

- Annual Performance Reports (APR) notices
- Perkins Local Application Submission, Review and Approval
- Performance Targets and Negotiations
- Perkins Annual Allocations
- Consortium Monitoring Review notices
- Due dates and deadlines

Minnesota State and MDE recognize informal communication as a critical method to stay engaged and connected with Perkins consortia leaders and the CTE community. Perkins consortia leaders and state staff are highly encouraged to share information using these information communication channels, such as:

- Minnesota CTE Twitter (<https://twitter.com/MinnStateCTE>)
- Minnesota CTE Facebook (www.facebook.com/MinnStateCTE/)
- Perkins Leaders listserv (perkinsleaders@lists.minnstate.edu)
- Minnesota State CTE website (www.minnstate.edu/system/cte)
- MDE website (<http://education.state.mn.us/MDE/dse/cte/>)

In addition, Minnesota State and MDE regularly request feedback and evaluation from Perkins consortia leaders and CTE participants for continuous improvement efforts. The preferred method for collecting feedback is through online surveys, but in some cases paper evaluations may also be used. In some situations, it may be necessary or more effective to collect face-to-face feedback.

Examples of feedback collected from consortia leaders include feedback on:

- Events (e.g. workshops, conferences, webinars, monitoring visits)
- Technical assistance
- Professional development offerings and activities
- The Perkins local application process
- Business processes and procedures

Feedback collected is used to make improvements to better serve Perkins consortia leaders and the broader CTE community.

Consortium Governance

Consortium Membership Requirements

- Each consortium must have at least one eligible secondary school district member and at least one eligible postsecondary college member
- No school district or college may belong to more than one consortium
- Charter schools with a state-approved CTE program who request membership shall be invited to participate in a consortium
- State CTE leaders reserve the right to mediate the final consortium structure to ensure that no interested college or school district is excluded
- Representatives from Adult Basic Education, CareerForce (formerly known as the Minnesota Workforce system), business and industry, and community organizations may be invited by the local consortium to participate as partners

Consortium Governance Structure

The consortium governance structure is determined by the consortium with the following requirements:

1. The superintendent(s) and college president(s) of participating secondary and postsecondary consortium members identify at least one secondary and one postsecondary Perkins Coordinator.
2. Each consortium must develop a single biennial application and unified budget to guide the planning, implementation, and use of funds for improving CTE programs in their consortium. Budgets must be updated annually.
3. Each consortium identifies one secondary fiscal host school district and one postsecondary fiscal host college with the responsibility to manage the funds distributed to the consortium in accordance with the Perkins V Act and Minnesota state law.
4. The defined leadership structure of the consortium maintains authority for all secondary and postsecondary spending decisions, and independent spending authority may not be delegated to any individual school district or college partner.
5. The consortium plan includes the consortium's initiatives to support the mission and vision for CTE in Minnesota as established by the Minnesota State Perkins Plan and the plan to meet the state-determined levels of performance

required under the law by the U.S. Department of Education, Office of Career, Technical, and Adult Education.

6. The consortium plan receives approval and signature support from each member school district superintendent and each college president to show agreement with the plan's content.

Procedure for Changing Consortium Membership

It is the intent of the Minnesota CTE State Plan that the Perkins consortium structure will provide consistent and effective CTE planning and program operation for the region. As such, changes in the membership of a Perkins consortium must be made with careful consideration of the effects on students, member institutions, and the consortium. Minnesota CTE state leaders at Minnesota State and MDE reserve the right to approve the final membership of any Perkins consortium to ensure that no eligible college or any eligible school district is excluded.

If a consortium member school district or college wishes to withdraw from one Perkins consortium and join a different consortium, the following shall apply:

1. The Minnesota State Director of Career and Technical Education must receive a written letter of intent requesting consideration of change and a rationale for such change in consortium membership from the superintendent of the consortium member school district or the president of the member college requesting the change. This letter must be received by October 1 (the required date of the APR submission) of the year prior to any actual change so that data-driven decisions can be made by all stakeholders. The timeline is applicable for all consortium membership changes.
2. The Minnesota State Director of Career and Technical Education must receive written acknowledgement of the requested change in membership indicating an understanding of the implications of such change from all consortium member superintendent(s) and college president(s) from both consortia involved. In the case of a request to join a consortium, all consortium member superintendent(s) and college president(s) from the two consortia involved must indicate their agreement with the requested change.
3. The written request for consortium membership changes and the acknowledgement by all members from both consortia must include evidence of consideration of the following potential impacts on the consortia:
 - a. Financial impact of changes in the census, geographic, participation, and Pell grant variables that determine the level of the consortium's Perkins funding.
 - b. Changes in consortium performance on Perkins accountability indicators and performance targets.
 - c. Availability of CTE programming for all students in the consortium.
 - d. Effect on existing articulated and dual-credit agreements between secondary and postsecondary member Institutions.

- e. Changes in consortium's state-recognized Programs of Study.
 - f. Changes in consortium leadership, personnel, and governance structure.
4. Where withdrawal from a consortium would affect the funds received by the consortium due to population or program participation, such withdrawal would become effective at the beginning of the fiscal year after the end of the next fiscal year (e.g. a withdrawal request submitted prior to June 30, 2020 would be effective July 1, 2021).

Roles and Responsibilities of Perkins Consortium Coordinators

The roles and responsibilities of Perkins Consortium Coordinators are to:

1. Collaboratively facilitate development of the biennial local unified secondary/postsecondary Perkins consortium application and budget—including budget updates and changes in intervening years. Submit the application through the Minnesota State grant management system online by **May 1st of each year**. (The consortium application must include the consortium's initiatives to meet state-determined levels of performance required under the law by the U.S. Department of Education, Office of Career, Technical, and Adult Education.) 
2. Facilitate completion of a Comprehensive Local Needs Assessment (CLNA) not less than every two years and prior to submission of the local consortium application for Perkins V funding. The CLNA can be limited to the consortium or can be regional in scope.
3. Manage consortium activities and budget to meet the unified goals of the consortium and requirements of the Perkins Law.
4. Submit an Annual Performance Report (APR) online using the Minnesota State grant management system by **October 1st each year**. 
5. Provide, or arrange with state CTE leadership to provide, technical assistance and professional development to assist consortium partners with achieving consortium goals and meeting state-determined performance measures.
6. Coordinate development and implementation of state-recognized Programs of Study among high schools and the Minnesota State college partner in the consortium.
 - a. Each local Perkins consortium is required to have in place six state-recognized Programs of Study.
 - b. Each Program of Study must meet the seven minimum requirements specified in the state-recognized Programs of Study User Guide.
7. Participate in the CTE Fall Conference and the annual one-day Perkins consortium coordinator/leader meeting led by state CTE leadership.

HIGH QUALITY CTE PROGRAMMING

State-recognized Programs of Study

In Minnesota, a CTE Program of Study follows the Perkins V federal law defining it as a coordinated, non-duplicative sequence of academic and technical content at the secondary and postsecondary level. It must also:

NEW!

- Incorporate challenging state academic standards
- Include both academic and technical knowledge and skills that are aligned with state-approved frameworks, including employability skills
- Be aligned with local and regional needs
- Progress in specificity (beginning with all aspects of an industry or career cluster) and lead to more occupation-specific instruction
- Have multiple entry and exit points that incorporate credentialing
- Culminate in the attainment of a recognized postsecondary credential

Minnesota leadership has supported and promoted the updating of Program of Study criteria to broaden the impact of CTE programs. This includes the development of a new *State-Recognized Programs of Study User Guide* which contains a complete set of tools to support consortia in developing state-recognized Programs of Study. An online version can be accessed at https://www.minnstate.edu/system/cte/consortium_resources/documents/Minnesota-State-Recognized-Programs-of-Study-Oct-2019.pdf.

In addition to providing rubrics to enhance program quality, the purpose of the user guide is to:

- Define minimum criteria, self-evaluation, and continuous Improvement rubrics that align with national and state education efforts encouraging systemic reform in academics/liberal arts and sciences and CTE
- Provide leaders with steps to follow to enhance and strengthen CTE programs at the secondary and postsecondary levels within a Perkins consortium, and
- Support the Minnesota consortium model as it emphasizes continued leadership and collaboration – multiple secondary high schools and college(s) working with regional business/industry partners and government agencies

Perkins V calls for states to offer CTE Programs of Study. Each program of study must meet all seven of the minimum requirements described in the framework below to be recognized by the state as a Program of Study.

1. Course standards must accurately align to the academic, technical, and employability skills learners must master for entry and success in a given career pathway. (Content standards, frameworks, and competencies that define what students are expected to know and be able to do to enter and advance in college and/or careers comprise the foundation of a POS.)

2. Programs of Study incorporate active involvement from an integrated network of partners. (Ongoing relationships among education, business, and diverse community stakeholders bolster POS design, implementation, evaluation, and maintenance.)
3. Secondary programs meet MDE program-approval requirements and incorporate courses that lead to postsecondary credits/credentials. Secondary programs have appropriately licensed teachers and advisory committees; develop and ensure access to equitable student leadership opportunities; and provide career exploration activities leading to postsecondary credits/credentials.
4. Postsecondary academic programs meet Minnesota State board policy and Higher Learning Commission requirements. (A cohesive arrangement of college-level credit courses and experiences, designed to accomplish predetermined objectives, lead to the awarding of a degree, diploma, or certificate.)
5. Materials, Equipment and Resources: Facilities, equipment, technology and materials used in the program of study reflect current workplace, industry and/or occupational standards and practices for installation, use, maintenance, and safety.
6. Program of Study incorporates authentic work experiences at the secondary and/or postsecondary level that are valued by industry. (POS engages students in authentic work-based learning experiences that demonstrate progressive occupational learning aligned to industry workforce needs.)
7. Program of Study development, improvement and advocacy are supported by findings from a comprehensive local needs assessment. (Systems and strategies for gathering, analyzing, and disseminating needs-assessment data are effective for guiding the improvement of POS, and available in plain language to enhance use by stakeholders for POS advocacy.)

As a partner of the Minnesota Workforce Investment and Opportunity Act (WIOA) plan, Perkins leadership has used the Jobs for the Future's 2015 crosswalk to align the Career Pathway framework with our state-recognized Programs of Study. (See Table 2.)

CTE Program Approval and Review

CTE programming quality is assessed through the initial approval process and a regular cycle of program review. Methodology is different for postsecondary and secondary programs.

Postsecondary Approval and Review

To be eligible for Perkins funding, postsecondary programs

Table 2: How the six elements of Career Pathways relate to the seven criteria of Programs of Study (POS) *

Career Pathways Six Elements	POS seven criteria	Common Features
1. Build Cross-Agency Partnerships	# 2 # 7	<ul style="list-style-type: none"> • Cross-agency partnerships include education, business, workforce, economic development, and community stakeholders • Common vision and goals • Clearly delineated and agreed-upon roles/responsibilities for all partners
2. Identify Industry Sectors and Engage Employers	# 1 # 2 # 7	<ul style="list-style-type: none"> • Both CP and POS frameworks stress the analysis and validation of economic and workforce trends, and adaptation of pathways accordingly
3. Design Education and Training Programs	# 1 # 2 # 3 # 4	<ul style="list-style-type: none"> • Clear, non-duplicative sequences of courses • Opportunities to earn college credit leading to industry-recognized, postsecondary and secondary credentials • Credit transfer/articulation agreements • Counseling, including career planning and academic advisement • Support services, especially in CP • Contextualization and modularization of curricula, and mapping of pathways • Integrated instruction of academic and technical content, acceleration (dual enrollment in POS; co-enrollment in CP) • Instructional strategies that instill work readiness skills
4. Align Programs and Policies	# 3 # 4	<ul style="list-style-type: none"> • Emphasis on the role of federal, state, and local policies in promoting and sustaining CP and POS – and in helping students access CP and POS services
5. Identify Funding Needs and Strategies	# 5 # 7	<ul style="list-style-type: none"> • Braided or integrated funding from multiple funding sources to provide sufficient resources and sustain programs • Importance of funding to support professional development and other system development activities
6. Measure Systems Change and Performance	# 2 # 5 # 7	<ul style="list-style-type: none"> • Importance of defining outcomes/ measuring progress • Processes for collecting, storing, analyzing and sharing data are encouraged in both CP and POS frameworks

*Six elements of Jobs for the Future 2015's Career Pathways cross walked to the seven minimum criteria of State-Approved Programs of Study (POS)

must be approved by the Minnesota State Academic Programs unit and appear in the official program inventory. CTE programs must also be assigned a designated CTE-approved Classification of Instructional Program (CIP) code.

More information on postsecondary CTE program approval is available on the Minnesota State Academic Programs webpage at <https://minnstate.edu/system/asa/academicaffairs/programs/index.html>.

While program approval is the responsibility of the Minnesota State system, program review is the responsibility of the individual institution. For all Minnesota State campuses, the review shall encompass all instructional areas and be structured according to discipline, academic program or program cluster, department, or other academic unit.

In addition, while the actual process is the responsibility of the campus, it must be in compliance with the accreditation

standards of the Higher Learning Commission's *Criterion for Teaching and Learning: Evaluation and Improvement*: "The institution demonstrates responsibility for the quality of its educational programs, learning environments, and support services, and it evaluates their effectiveness for student learning through processes designed to promote continuous improvement."

Secondary MDE Program Approval and Review

Program Approvals are submitted to MDE on a five-year cycle (Minn. R. 3505.2400) and must be received prior to November 1 in the cycle year. Program Approvals received after November 1 will continue to be reviewed by department staff; however, it may not be possible to process those submissions in time for inclusion into the CTE levy.

Although all districts within a consortium need to submit program information according to the five-year cycle schedule, best practice is to submit any program and/or course updates

to MDE on an on-going basis so that the most current information is maintained. A current list of all approved programs and courses (see Program Approval Database) as well as a copy of the program approval form can be found on MDE's Program Approval webpage at <https://education.mn.gov/MDE/dse/cte/progApp/>.

As part of the program approval process, local site teams are encouraged to use the Self-Evaluation and Continuous Improvement Rubric for the purpose of evaluating their CTE program's strengths and areas for improvement. It can be found online at <https://education.mn.gov/MDE/dse/cte/progApp/>.

Secondary Five-year Cycle Schedule for Program Review

Table 3 below provides a list of each Secondary Perkins Consortium and the year in which their districts will need to submit Program Approval forms to MDE.

Table 3: Secondary Five-Year Cycle Schedule for Program Review

Consortium	Program Approval due
METRO AREA	
Hennepin West	2021-2022
Minneapolis	2021-2022
Southwest Metro	2021-2022
NORTHWEST	
Central Lakes	2022-2023
Lakes Country	2022-2023
North Country NW	2022-2023
Pine to Prairie	2022-2023
Runestone	2022-2023
NORTHEAST	
Carlton +2	2022-2023
East Range	2022-2023
Hibbing-Chisholm	2022-2023
Itasca	2022-2023
Lake Superior	2022-2023
CENTRAL	
Great River	2023-2024
Mid-Minnesota	2023-2024
NE Metro	2023-2024
Oak Land	2023-2024
Pine Technical	2023-2024
St. Paul	2023-2024
SOUTHWEST	
Dakota County	2019-2020
Minnesota West	2019-2020
South Central	2019-2020
South Metro	2019-2020
SOUTHEAST	
Riverland	2020-2021
Rochester/ZED	2020-2021
Southeast	2020-2021

Secondary Connections to Funding Sources

Programs approved for school districts that are part of a Perkins consortium become eligible to request federal Perkins funds from their consortia. Districts with approved programs also have the ability to access the state CTE levy (Minn. Stat. §124D.4531). This non-discretionary levy provides funding resources to cover program costs for staff, professional development, travel, and operational supplies.

Finally, as a part of federal accountability reporting requirements, each district is required to annually submit program data to MDE. Data submitted to MDE needs to align with the programs and courses listed in the Program Approval Database found at <https://education.mn.gov/MDE/dse/cte/progApp/index.htm>. Specifically, only/all programs taught by an appropriately licensed CTE teacher need to be included in the annual Perkins (P-file) data submission.

Once received, P-file data are integrated into the Perkins database. P-file data are summed across a student's entire high school experience in order to determine Concentrator status (see Accountability section for specific details on page 19). The funding formula for each consortium consists of: number of concentrators, census data, area square mileage, and the number of households in poverty. It is critical that P-file data for these approved programs is submitted accurately on an annual basis to MDE.

THE LOCAL APPLICATION

Local Application Process

Pursuant to Section 134 of the Perkins V Act, to receive funds under Perkins V, a consortium must develop and submit a biennial, unified, local secondary/postsecondary Perkins application and budget (including an updated budget and content changes in intervening years). The application must address secondary and postsecondary CTE programming.

The local application, due **May 1**, must be signed by each participating college president and each participating school district superintendent. The plan must also include strategies to meet the state-determined performance levels required under the law. If, in the previous year, the consortium failed to meet the state-determined performance levels on a core indicator, the local application must also include an improvement plan.

NEW!

The approved local application—with statement of assurance signatures—serves as the consortium’s formal application for receiving Perkins funding.

Submission of the Local Application

Local Perkins applications are submitted online through the Minnesota State grant management system. The application is divided into several sections in the Minnesota State grant management system, allowing consortium users to respond to narrative and budget questions separately.

Training and technical assistance webinars and instructional videos are available to help consortia learn about the online submission of local Perkins applications and to update consortia about any changes made to the local application.

Application Components

Note to Consortia Leaders: As of the date of publication of this document, contents of the local consortium application under Perkins V have not been fully determined, nor has it been determined how the new grant management system will be designed to accommodate local application requirements. Local applications will, however, include at a minimum, the components described in the following paragraphs. Please visit the online version of this publication for updates at https://minnstate.edu/system/cte/consortium_resources/index.html.

Narrative

The body of the local application is structured around the specific requirements identified in section 134(b) of the Perkins V Act. A summary of these requirements is included here. Each consortium application will include/describe:

- CLNA results

- CTE course offerings and activities provided with Perkins V funding
- How the consortium will:
 - Provide career exploration, development, and guidance
 - Improve academic and technical skills of CTE students
 - Prepare special populations for high-skill, high-wage, or in-demand occupations, provide equal access, ensure they are not discriminated against, and prepare students for nontraditional fields
- Work-based learning opportunities available to students and how they will be developed or expanded
- Post-secondary credit opportunities for high-school students
- Recruitment, preparation, retention, and training of CTE professionals
- Gaps or discrepancies in performance

The state may include additional requirements as necessary.

Comprehensive Local Needs Assessment (CLNA) Framework

New to Perkins V is the requirement for a Comprehensive Local Needs Assessment (CLNA) to be completed prior to application submission every two years. Results of the CLNA must be incorporated into the local consortium application and will drive consortium spending decisions. Please note that the first question required in the local application asks for the description of the CLNA and how that work informed the selection of activities funded through Perkins V.

NEW!

Consortia will submit the completed CLNA Framework document along with the local consortium application. The CLNA Framework document is a standardized reporting tool for consortia to report their needs assessment results. Consortia will complete and upload this as a separate document in the Minnesota State grant management system. The CLNA Framework document and CLNA Guide can be downloaded from the Minnesota State website, <https://minnstate.edu/system/cte/perkins-local-application/index.html>. The CLNA Guide is available to consortia leaders to provide guidance on the process of conducting a needs assessment.

The comprehensive local needs assessment must include the following: (Sec.134)

- An evaluation of student performance with respect to state-determined and local levels of performance, including an evaluation of performance for special populations and subgroups
- How CTE programs offered are of sufficient size, scope, and quality—and aligned to in-demand industry sectors
- Progress toward the implementation of CTE programs and programs of study

- How local recipients will improve recruitment, retention and training of CTE teachers, faculty and specialized instruction support personnel
- Progress toward implementation of equal access to high-quality CTE courses and programs of study

Secondary Supplemental Budget

Each consortium will complete the required secondary supplemental budget form. The form connects budget information for each goal area to UFARS object codes. The completed form should be uploaded to the Minnesota State grant management system and included with the consortium’s local application.

Perkins-Funded Positions and Coordination Time for the Grant

This section of the application is designed to include information on coordination of the Perkins Grant (e.g., the budget and percent of staff time at secondary and postsecondary levels). The section also should include a list of individuals whose salaries are paid in full or part with federal Perkins dollars.

Improvement Plans

If a consortium’s actual performance falls below 90 percent of the state-determined performance levels for any indicator, the consortium must write an Improvement Plan for that indicator. Please refer to the criteria listed in Table 4 below when completing the Improvement Plan(s) within the Minnesota State grant management system.

State-recognized Programs of Study

The Perkins legislation requires the development of Programs of Study. These programs, at a minimum, must:

- Incorporate challenging state academic standards, including those adopted by a state under section 1111(b) (1) of the Elementary and Secondary Education Act of 1965
- Address both academic and technical knowledge and skills, including employability skills
- Be aligned with the needs of industries in the economy of the state, region, tribal community, or local area
- Progress in specificity (beginning with all aspects of an industry or career cluster and leading to more occupation-specific instruction)
- Have multiple entry and exit points that incorporate credentialing
- Culminate in the attainment of a recognized postsecondary credential

Table 4: Components of the Improvement Plan

- Identification of any special populations where gaps in performance exist
- Contextual factors contributing to existing performance gaps
- Resources needed
- Timeline
- Person(s) responsible
- Description of how progress will be documented

To help state and local recipients meet these requirements, Minnesota State, MDE, and consortia leaders have formulated a set of documents to help local consortia create and maintain high quality programs of study.

The checklist and rubrics that were developed are derivative of four existing documents: Rigorous Programs of Study (RPOS) Rubric, MDE Program Assessment Rubric, ACTE High Quality Program Rubric, and Auditing a State Career and Technical Education Program for Quality.

The idea is that we will no longer differentiate between “rigorous” and “regular” Programs of Study. All state-recognized Programs of Study are high quality and meet rigorous standards.

The minimum requirements checklist for consortia Programs of Study must be incorporated into consortia two-year plan applications to the state. Designed as a “one-stop-shop” for all of the documents, processes, definitions, and program-approval information, a complete *State-Recognized Programs of Study User Guide* is available at https://www.minnstate.edu/system/cte/consortium_resources/documents/Minnesota-State-Recognized-Programs-of-Study-Oct-2019.pdf.

Each consortium must identify at least six state-recognized Programs of Study. These POS must represent at least four of the six career fields listed on the Minnesota Career Fields, Clusters & Pathways chart.

Each consortium is also encouraged to have at least one state-recognized POS in each career field to provide broad experience for the student.

This may require collaboration or brokering of services with other educational institutions. No more than one of the six required state-recognized POS will be brokered. State-recognized POS should be developed in high-skill, high-wage, or in-demand occupations reflecting regional needs and in concert with WIOA regional plans.

Statement of Assurances and Certifications

The final section of the online local application allows consortia to download the Statement of Assurances & Certifications form. The form must be signed by all members of the consortium, that is, each college president and each school district superintendent.

Once all signatures have been collected, the form should be scanned into a single PDF document and uploaded to the Minnesota State grant management system application. The online application can, at that point, be electronically submitted. However, it is necessary to also send in the Statement of Assurances and Certifications, with original signatures, for the application to be considered complete.

Local Application Approval Process

Once consortia applications are completed and submitted to the Minnesota State grant management system, a full staff review of all applications is conducted by MDE and Minnesota State staff. Application review meetings are scheduled with each consortium to allow consortia leaders to present their local applications to state leadership. These meetings can be conducted via a remote communication platform, or consortia leaders may prefer to meet face-to-face with state staff at the System Office. During this 60- to 90-minute meeting, consortia staff present their local application to state leadership and respond to questions from the reviewers. Reviewers may ask for additional information or suggest revisions.

Implementation of the Plan

The approved local application serves as the formal document detailing goals, outcomes, and approved expenditures. The Perkins V application describes activities aligned with the CLNA, state-determined performance levels, and federal legislation. Once the local application is approved by state staff, efforts to

implement it are focused on supporting and improving CTE curriculum, instruction and assessment, the implementation of Programs of Study, and supporting CTE teachers and faculty.

Annual Performance Report

Consortia are required to submit an Annual Performance Report (APR) in October of each year via the Minnesota State grant management system. This report identifies the progress made in implementing the activities and goals outlined in the local consortium application. State staff will provide additional guidance to consortia leaders on APR requirements for the year, as well as how to successfully submit the report to state staff.

Reporting Timeline

The reporting timeline pictured below identifies important dates and deadlines for consortia leaders to meet state requirements. The timeline also lists key events in which consortia leaders are highly encouraged to participate. For more information, see Appendix B.



Figure 1: Perkins Workflow Diagram



ACCOUNTABILITY, REPORTING AND CTE DATA

Perkins and Core Performance Indicator Definitions

Perkins V provides a list of secondary and postsecondary core performance indicators. As part of the State Plan development process, states were directed to establish how these indicators would be measured and how the populations measured (CTE participants and concentrators) would be defined. Below are the proposed operational secondary and postsecondary definitions for CTE students and the core indicators that will be used to report data for accountability purposes.



NEW!

Proposed Secondary CTE Definitions

Participant: Any 9th-12th grade student who successfully completes one or more courses which are part of a state-approved secondary CTE program.

Concentrator: Any 9th-12th grade student who successfully completes 150 or more course hours which are part of a state-approved secondary CTE program within one career field.

Proposed Secondary Core Accountability Indicator Definitions

1S1: 4-YEAR COHORT GRADUATION RATES

Numerator: Number of CTE concentrators who, in the reporting year were included as graduated in the state's computation of its four-year cohort graduation rate.

Denominator: Number of CTE concentrators who, in the reporting year, were included in the state's four-year computation of its four-year cohort graduation rate. Includes: 1) graduates, 2) dropouts, 3) continuing, and 4) unknown.

1S2: 7-YEAR COHORT EXTENDED GRADUATION RATE

Numerator: Number of CTE concentrators who, in the reporting year were included as graduated in the state's computation of its seven-year cohort graduation rate.

Denominator: Number of CTE concentrators who, in the reporting year, were included in the state's seven-year computation of its graduation rate. Includes: 1) graduates, 2) dropouts, 3) continuing, and 4) unknown.

2S1: ACADEMIC PROFICIENCY: READING/LANGUAGE ARTS (SNAPSHOT)

Numerator: Number of students who were CTE concentrators by the end of their 10th grade year, and who met or exceeded the proficiency level on the statewide high school reading assessments, either the MCA or MTAS.

Denominator: Number of students who were CTE concentrators by the end of their 10th-grade year who took the MCA or MTAS and whose high school reading assessment scores were included in the State's ESSA computation.

2S2: ACADEMIC PROFICIENCY: MATHEMATICS (SNAPSHOT)

Numerator: Number of CTE concentrators who met or exceeded the proficiency level on the statewide high school mathematics assessments, either the MCA or MTAS, during their 11th-grade year.

Denominator: Number of CTE concentrators by the end of their 11th grade year, who took the MCA or MTAS and whose high school mathematics assessment scores were included in the State's ESSA computation.

3S1: POST-PROGRAM PLACEMENT

Numerator: Number of CTE concentrators who, in the second quarter after graduating high school, are in postsecondary education or advanced training, military service or a service program that receives assistance under title I of the National and Community Service Act of 1990 (42 U.S.C. 12511 et seq.), are volunteers as described in section 5(a) of the Peace Corps Act (22 U.S.C. 2504(a)), or are employed.

Denominator: Number of CTE concentrators who graduated high school.

4S1: NONTRADITIONAL PROGRAM CONCENTRATION

Numerator: Number of CTE concentrators from underrepresented gender groups who completed a program that leads to employment in nontraditional fields during the reporting year.

Denominator: Number of CTE concentrators who completed a program that leads to employment in nontraditional fields during the reporting year.

5S2: PROGRAM QUALITY: POSTSECONDARY CREDIT

Numerator: Number of CTE concentrators who graduated and who successfully completed one or more Concurrent Enrollment and/or Articulated Credit courses.

Denominator: Number of CTE concentrators who graduated high school.

5S4: TECHNICAL SKILL ATTAINMENT

Numerator: Number of CTE concentrators graduating from high school who successfully completed one or more state-approved Technical Skills Assessments and/or earned an Industry Recognized Credential.

Denominator: Number of CTE concentrators graduating from high school.

Proposed Postsecondary CTE Definitions

Participant: A student enrolled in a Minnesota State two-year college who belongs to a particular CTE entering cohort and who:

- Earned more than zero college-level credits (cumulative) AND, within the cohort timeframe, was enrolled in a CTE program/award level or,
- Earned more than zero college level credits in CTE course(s)

Concentrator: A student enrolled in a Minnesota State two-year college who belongs to a particular CTE entering cohort and who:

- Is enrolled in a long-term (12 or more credits) CTE program/award level AND earned 12 or more college level credits (cumulative), or
- Completed a CTE award in a short-term (less than 12 credit) CTE program within the cohort timeframe

(Students enrolled in a short-term program who have not yet received that award are counted as Participants. In addition, students who meet concentrator criteria but then receive only a non-CTE award within the cohort timeframe are counted as participants.)

Proposed Postsecondary Core Accountability Indicator Definitions

1P1: POSTSECONDARY RETENTION AND PLACEMENT

Numerator: Number of CTE concentrators in the cohort who, during the second quarter following program completion, are one or more of the following: enrolled in postsecondary education; in advanced training; in military service; in national or community service or the Peace Corps; or employed.

Denominator: Number of CTE concentrators who complete a CTE program/award (i.e., certificate, diploma, AAS or AS) within the cohort timeframe.

2P1: EARNED RECOGNIZED POSTSECONDARY CREDENTIAL

Numerator: Number of CTE concentrators who complete a CTE program/award (i.e., receive a CTE certificate, diploma, AAS or AS) within cohort timeframe.

Denominator: Number of CTE concentrators in the cohort.

3P1: NONTRADITIONAL PROGRAM ENROLLMENT

Numerator: Number of CTE concentrators in the cohort who are enrolled in a CTE program classified as nontraditional for their gender.

Denominator: Number of CTE concentrators in the cohort enrolled in a CTE program classified as nontraditional.

While CTE “completers” are not defined in the Perkins V legislation, core indicators 1P1 and 2P1 both include that population of students. Minnesota defines CTE completers as students enrolled in a Minnesota State two-year college who belong to a particular CTE entering cohort and who receive a CTE award in a long- or short-term Perkins-eligible program within the cohort timeframe. In addition, Minnesota defines a CTE award as an AAS, AS, Certificate or Diploma.

State-Determined and Local Levels of Performance

State-Determined Levels of Performance

Perkins V legislation requires eligible agencies (i.e., the state) to establish state-determined levels of performance for all four grant years and include them in the state plan submitted to the Office of Career, Technical, and Adult Education (OCTAE) in the spring of 2020.

The state performance levels are to be determined using a process that involves eligible recipient and stakeholder input. They are required to show continuous improvement in the performance of CTE concentrators, and they are subject to a 60-day public comment process prior to being submitted in the state plan.

There is no negotiation process between the state and OCTAE. The state-determined performance levels, along with the methodology and process used to set them, are submitted in the state plan, and they are accepted or not. The state may revise indicator performance levels but, depending on the circumstances (unanticipated circumstances or other reasons), the requirements for the process and criteria that must be followed in making those adjustments are different.

After review of various methodologies for establishing state and local performance levels, the state-recommended methodology involves using a factor of the standard deviation of historical data for each performance indicator to establish what would be “meaningful progress” on that indicator by the fourth year of the grant. The proposed rate for reaching that level over the four years is used to determine the annual state-determined performance levels.

The state will be evaluated on core indicator performance against the appropriate state-determined performance level for each indicator each December.

Local Levels of Performance

The process for distributing proposed local levels of performance is still being developed. Similar to the state-determined levels of performance, local levels of performance will be established for all four grant years.

The proposed methodology for establishing local performance levels involves first establishing the state performance levels. From there, local annual levels of performance are determined by looking at the opportunity for improvement at the state level and seeing what portion of that improvement is held by each consortium. The amount of improvement is apportioned to consortia, using the same rate of annual growth that was used to establish the state annual levels of performance for that indicator.

Similar to the state, there will be no annual negotiation process. The objective criteria and methods consortia would use to request revisions to future performance levels are still under development and will be shared once available.

Consortia will be evaluated on their core indicator performance for the previous reporting year in the spring of each year, shortly following the submission of the state Consolidated Annual Report (CAR). For example, consortia would be evaluated on reporting year 2020 in early spring 2021.

State Consolidated Annual Report

Each December, Perkins V requires the state to submit the Consolidated Annual Report (CAR) to OCTAE. The CAR includes the state's progress on meeting state-determined performance levels from the most recently completed reporting year. Data regarding performance for each core indicator, and for each of the subgroups of students, special populations, and CTE cluster must be reported for each indicator.

CTE participant and concentrator counts disaggregated by subgroups of students and special populations by CTE Cluster must also be reported. The disaggregation of the data is not required if the number of students would be considered private data or potentially reveal personally identifiable data about a student.

If the state does not meet at least 90 percent of the state-determined performance level for any of the core indicators of performance for all CTE concentrators, the state will be required to implement an improvement plan during the subsequent year. The improvement plan must include an analysis of the gaps in performance among the special population and other disaggregated groups.

Whether or not the state meets their state-determined performance level on a core indicator, the state is also required to identify and quantify gaps in performance on the core indicators between any subgroups or special populations of students and CTE concentrators overall, including "a quantifiable description of the progress each such subgroup or special population of students" has made in meeting determined performance levels.

Perkins V also requires the state to publish actual levels of performance, including performance of special population and other disaggregated groups, publicly, in a variety of formats, including online. The process for how this will be done is still under development.

Local Performance Improvement Plan

The Perkins V legislation specifies that local recipients are also expected to meet at least 90 percent of their determined local levels of performance on the core performance indicators. If a local recipient falls below 90 percent of the determined local performance level, they will need to develop an improvement plan and implement it during the year subsequent to the one in which they did not meet 90 percent of the performance level.

Similar to the requirement for states, a local improvement plan must include an analysis of the gaps in performance among the special population and other disaggregated groups. The development and distribution process for a local (consortium) level core indicator performance report is still in progress. Information will be shared as it is available.

Regardless of whether the eligible recipient meets 90 percent of the performance level for a core indicator, each year local recipients must also analyze disaggregate data for each indicator and identify and evaluate where there are disparities in performance between the subgroups or special populations of students and all CTE concentrators being included in the accountability measure. This analysis will likely be included as part of the Annual Performance Reports consortia complete and submit to Minnesota State each year, but that is still being determined.

CTE Accountability and Reporting Data—Secondary

In Minnesota, there are approximately 343 secondary districts of various types, as well as charter schools, that are implementing approved CTE programs. Approved CTE programs are those which: have been verified by MDE staff as being taught by an appropriately licensed CTE instructor (Minn. R. 3505.1000, Subp. 31A); meet minimum standards for approval (Minn. R. 3505.1100); and, which are therefore eligible to receive Perkins funds (Minn. R. 3505.2400) and/or access the CTE levy (Minn. Stat. §124D.4531).

Each district or charter school receiving Perkins funds must annually submit their P-File (Perkins) data to MDE (Minn. Stat. §124D.452; Minn. R. 3505.1800) via a secure web-based software application system. Because the P-File contains student-identifiable data, only one user per district is authorized to submit the P-file to MDE. The secure, web-based software application system is open for data submission from mid-May to mid-September; official announcement and training dates are sent out upon the system's opening.

Secondary Data Collection Overview: Submitting a P-File (Perkins data)

It is critical that a high degree of accuracy and integrity is maintained within the P-File data. Authorized users are highly encouraged to align their district's P-File data with the programs and courses listed in the Program Approval Database. District-authorized users are able to verify the accuracy of their P-File data by working through the information provided in the Help Document: P-File Checklist posted on the MDE's Performance Indicator and Data Collection website. This document walks through the information within the Carl Perkins Submission Status Report found under the "Carl Perkins Secure Reports" section of MDE's Secure Reports page.

After the P-File has been accepted into the system, it is important to review the Submission Status Report. The Submission Status Report is a data feedback table which summarizes information listed within a district's current data submission alongside a prior-year comparison of the same data elements. District-authorized users are able to verify the accuracy of their P-File data by working through the information provided in the Help Document: P-File Checklist posted on the MDE's Performance Indicator and Data Collection website.

MDE staff provide technical assistance. Staff at MDE collaborate with authorized users as well as administrators on an ongoing basis in order to provide P-File submission information, resources, and critical updates. Technical assistance is delivered through a variety of formats such as: monthly webinars, consortium-specific group trainings by request, conference presentations, and individual/personal communication. Contact MDE staff for scheduled webinar dates as well as any specific training or data needs.

Secondary Data Collection Overview: Data Verification Process

There are a number of ways in which the secondary P-File data are systematically verified.

Once a district submits their P-File data through the secure web-based software application, the software application performs an automated verification of each of the data elements within the P-File. For a list of all the data elements included in the P-File, please see the Carl Perkins Record Layout document listed within MDE's Performance Indicator and Data Collection website.

The primary function of this automated process is to verify that:

1. Each Student Identification (SSID) number listed within the P-File also exists within the Minnesota Automated Reporting Student System (MARSS) database.
2. Each school building listed in the P-File matches the district number it is reported under according to the information in MDE-Org.
3. The program and course code combinations listed within the P-File align with the program and course code combinations listed in Table C. (Table C is a document listing all possible program and course code combinations, as well as teacher licensure information.)

A district's P-File will not be accepted by the web-based application until it is deemed "error free" according to the standards set forth in the automated verification process. The data are stored in the Carl Perkins database which is maintained by MN.IT at MDE.

After the P-File has been accepted by the web-based application, the district-authorized users are encouraged to visit MDE's Secure Reports website in order to view and download their Perkins Submission Status Report. Again, this summary of the P-File data elements will help districts look for reporting errors and verify the accuracy of the information.

It is ultimately up to the district authorized user to coordinate with CTE program folks in order to verify that all approved programs and associated courses which were implemented within a given school year have been included in the P-File submission. Consortia leaders, however, have access to this report for the specific districts within their consortium as well.

Keep in mind that districts are able to submit updated P-Files as needed until the web-based system closes. The web-based application only retains a copy of the most recently submitted

P-File. Staff at MDE also assist in monitoring the accuracy of the P-File submissions and contact district authorized users as needed.

Secondary Data Sources

It is important that the Perkins data have a high degree of accuracy and integrity because elements from the Perkins database are linked with four additional data sources and are summed across multiple years of data.

All current year P-File data are verified against the SSID information in MARSS, specifically: student identification number, date of birth, and name. After all student level data have been verified, flags for participants and concentrators are created by summing the number of successful CTE course hours within one career field across a student's entire high school experience.

Finally, data from the Perkins database are linked with the following sources:

1. **MARSS (Minnesota Automated Reporting Student System):** This system contains student demographic information and high school completion codes.
2. **Migrant Flag:** This system is used to identify students who are documented migrant students. This information is used to link demographic data to assessment data and to report data to the U.S. Department of Education through the State's Comprehensive Annual Report (CAR). It is not part of MARSS. It is stored in its own database.
3. **MCA/MTAS:** These achievement test results are necessary for reporting academic achievement (1S1 and 1S2).
4. **SLEDS (Statewide Longitudinal Education Data System):** This system contains information from both the Minnesota State system as well as from the National Clearinghouse (see Postsecondary Data sources for a description of the National Clearinghouse). This information allows us to fulfill the federal reporting requirements for 3S1 Post-Program Placement.
5. **MCCC (Minnesota Common Course Catalog):** Relative to Perkins reporting, these data contain information about course enrollment and proficiency in Concurrent Enrollment and Articulated Credit courses. Once collected, these data are then uploaded to the SLEDS system.

Secondary Accountability and Reporting Data

Summary reports are created at the state, consortium, district, and individual school level. In addition to the Performance Indicator (1S1, 1S2, 2S1, 2S2, 3S1, 4S1, 5S2 and 5S4) reports, there are also four enrollment reports:

1. **Basic Student Enrollment Report:** Displays a single count of the total number of eligible CTE participants and concentrators.
2. **Program Report:** Displays the number of students who enrolled in each approved program within the current year. Students do not need to have been participants, concentrators, or have been proficient in the course to be counted.
3. **Course Report:** Displays the number of students who enrolled in each approved course within the current

year. Students do not need to have been participants, concentrators, or have been proficient in the course to be counted.

4. **Career Cluster Report:** Displays the number of CTE concentrators enrolled in approved courses as counted/organized by career cluster. CTE concentrators do not need to have concentrated in the career cluster in which they are counted. Instead, these data simply represent course taking patterns organized by career cluster. For example, a student could have become a concentrator in Marketing, but, within the current school year enrolled in a Hospitality & Tourism course as well as a Finance course. In this example, the concentrator would be counted two times in the table, once for Hospitality & Tourism, and once for Finance.

Accessing Secondary Perkins Accountability and Reporting Data

Since January 2017, consortia leaders have been to log into the Perkins section of MDE’s Secure Reports website (at <http://w20.education.state.mn.us/MDEAnalytics/DataSecure.jsp>) in order to access all their accountability and program reports. All Performance Indicator and Summary Reports are available at the state, consortium, district, and school levels.

Currently, there is a slightly different process for district users. Once the secure web-based software application system closes for data collection, the data are verified and compiled into summary reports. The system is reopened in early January for authorized users to log in and download their specific district and school reports.

The goal of these reports and special data requests is to assist in communicating with administrators at all levels (for example, consortia leaders, superintendents, principals, teachers, and program coordinators, etc.). Connecting people with these data, and with each other, improves the strength of local CTE programs and the likelihood of positive outcomes for all Minnesota students.

Secondary Perkins Accountability and CTE Data - Useful Links Accountability Webinars

<https://www.minnstate.edu/system/cte/professionaldevelopment/finance-and-accountability.html>

Perkins Secure Reports

<http://w20.education.state.mn.us/MDEAnalytics/DataSecure.jsp>

Performance Indicators and Data Collection

<https://education.mn.gov/MDE/dse/cte/data/>

Program Approval Database and Table C

<https://education.mn.gov/MDE/dse/cte/progApp/>

Educator License Lookup

<http://w20.education.state.mn.us/LicenseLookup/educator>

CTE Accountability and Reporting Data – Postsecondary

All thirty postsecondary institutions in Minnesota that receive funding under Perkins V are two-year colleges that are part of the Minnesota State Colleges and Universities system. Postsecondary colleges do not make separate Perkins data submissions to the state. Instead, Perkins performance and enrollment data are processed using existing statewide systems as the primary data source and supplemented with additional statewide record system/data as needed.

The resulting data, including student-level records, will be made available to appropriate state and local Perkins staff pending development of documentation, reporting tools, and appropriate data security request approval.

Proposed Postsecondary Data Structure – Entry Cohorts

Minnesota proposes using an entry cohort model to structure the Perkins V postsecondary accountability reporting. Students who enter an institution in a given fiscal year are tracked for three years. Their status and ultimate performance are measured at the end of the three-year cohort period.

For example, the FY 2018-2020 cohort (which would be reported on primarily in the December 2020 CAR) includes students entering in summer, fall or spring terms of FY 2018 who are then tracked through the end of FY 2020. (See Figure 2.)

Postsecondary Accountability and Reporting Data

The Perkins V data tables and process for accessing them are still under development. Information will be updated as it is available at https://minnstate.edu/system/cte/consortium_resources/index.html.

Figure 2: Example of how student cohorts would be tracked over a 3-year reporting period

FY 2018			FY 2019			FY 2020		
Enter Summer 2017	Fall 2017	Spring 2018	Summer 2018	Fall 2018	Spring 2019	Summer 2019	Fall 2019	Spring 2020
	Enter Fall 2017	Spring 2018	Summer 2018	Fall 2018	Spring 2019	Summer 2019	Fall 2019	Spring 2020
		Enter Spring 2018	Summer 2018	Fall 2018	Spring 2019	Summer 2019	Fall 2019	Spring 2020

Proposed Postsecondary Data Sources

Using the Integrated Statewide Record System (ISRS) and other statewide record systems as the sources of data for reporting, an automated system is being created to extract the data and calculate the postsecondary accountability indicators. This allows all colleges to use the same standards and definitions for reporting. The proposed sources of data are listed below:

Integrated Statewide Record System (ISRS): ISRS is the system-wide student record system. It includes data on student enrollment, majors, degrees and awards, courses, financial aid, the results of graduate follow-up surveys, etc., for all system institutions. ISRS data serves as the primary resource for identifying Perkins students within a cohort, special population classification, and some of the data points related to performance. Since ISRS contains the student's official record and transcript information, significant resources and effort are undertaken to ensure accuracy of this data.

National Student Clearinghouse (NSC): Since 1999, records from NSC have been loaded into the system's data warehouse each semester for all students enrolled in the system. This is an existing data transfer process that results in a data file used for a variety of system and institutional reporting, including identifying students who have completed a Perkins program and are continuing their education at colleges or universities within and outside the Minnesota State system. The NSC data provides information on transfer to institutions outside the system and supplements the information available on transfer to institutions within the Minnesota State system that is available using ISRS.

Department of Employment and Economic Development

– **UI Wage Data:** Through a data-sharing agreement with the Minnesota Department of Employment and Economic Development (DEED), research staff have access to Unemployment Insurance wage detail records. These data contain quarterly wage and employment information of all individuals working in covered employment in the state. This information is used as the primary source for reporting on student employment following program completion, supplemented by graduate follow-up survey data from ISRS, as needed.

Accessing Postsecondary Perkins Accountability and Reporting Data

The process for accessing data and creating Perkins V data reports is still under development. Information will be updated as it is available.

Postsecondary Perkins Accountability and CTE Data – Useful Links

Accountability Webinars

<https://www.minnstate.edu/system/cte/professionaldevelopment/finance-and-accountability.html>

Additional information/links will be added as they become available.

Student Data Privacy

Consortia, district and college staff may be given access to data and data tools that allow viewing of student-identifiable data. Staff are legally obligated to ensure the confidentiality and privacy of these data. Data privacy rules fall under the umbrella of both the Family Educational Rights and Privacy Act (FERPA) and the Minnesota Government Data Practices Act and must be followed accordingly.

In short, these acts exist to ensure that personal and private student data are not disseminated publicly. It is the responsibility of consortia staff to be familiar with these acts and to share private (disaggregated) data in an appropriate manner with authorized personnel only.

Student-identifiable data includes any data or information that, alone or in combination, would generally allow a person to identify a student with reasonable certainty and may include, but is not limited to:

- Student demographic information
- Immunization and health records
- Disciplinary records
- Student progress reports
- Grade point average
- Assessment results
- Attendance records

Summary data can be released, but only if aggregated to a level where the privacy of individuals is protected. This includes the release of directly identifiable data as well as data where the identity of individuals could be reasonably inferred through calculation.

Access to Private Data

Only individuals with permission to view student-identifiable data will be allowed access to private data and sources. Consortia staff are responsible for managing and disseminating data and results properly.

Any personnel receiving or with access to student-identifiable data should be trained on proper procedures for accessing, reporting, and handling private data.

Users of student-identifiable data should:

- Only access data within one's access rights unless given explicit permission to view
- Only access private data for legitimate consortium/educational purposes
- Utilize secure technology
- Lock up or destroy hard copies when not in use
- Not disclose student-identifiable data to unauthorized personnel
- Immediately report inappropriately accessed or shared data

Data Use and Reporting

Printed reports with student-identifiable data should be avoided as much as possible. When necessary, hard copies should be

collected after their use and stored securely or destroyed. Student-identifiable data should not be included in presentations or publications shared with groups where the members do not have authority to view this data (e.g., advisory committees, workgroups that include members external to the institution, etc.) This includes the sharing of data within the consortium between secondary and postsecondary partners.

Care should be taken in preparing any public reports of data to ensure student-identifiable data are not being shared. This includes reports like the Annual Performance Report (APR), the Local Application, etc.

Computer and Software Requirements

Any computer that receives, houses, or is used to manipulate student identifiable data must meet basic security requirements to ensure that private data is not released publicly.

1. Private data should be stored behind a secure firewall with password-protected access to only approved personnel.
2. Private data should never be stored or copied onto a transportable flash drive or other media. If regularly accessed via a local area network, copies should not be saved to desktop hard drives.
3. Data sharing, where required, should be parsimonious in that only relevant data fields are transmitted.

The consortia staff should have readily available contact information for their institution's data privacy personnel in the event of the release of student identifiable data. This person should be made aware in the event of the inappropriate release of private data so that necessary action can be taken.

Student Data Privacy Resources

Family Educational Rights and Privacy Act (FERPA)

<https://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html>

Minnesota Government Data Practices Act

<https://www.house.leg.state.mn.us/hrd/pubs/dataprac.pdf>

Minnesota State General Counsel Data Privacy Compliance

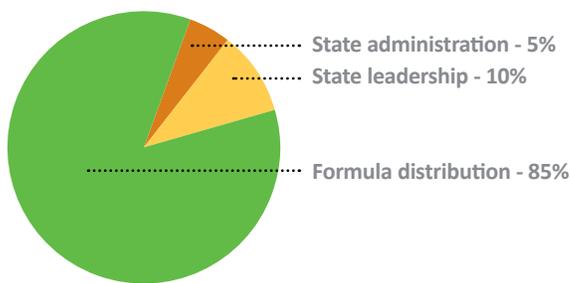
<https://minnstate.edu/system/ogc/dataprivacy/index.html>

PERKINS FUNDING

The purpose of this section is to offer transparency to the Perkins federal grant state allocation and the distribution of that allocation to the sub-recipients. As specified in the Act, Perkins V Title I funds allocated to the state are distributed among three categories:

1. **85 percent** – those provided to eligible recipients through formula-based distribution.
2. **10 percent** – those used for state leadership activities.
3. **5 percent** – those used for state-level administration of the grant.

Figure 3: Distribution of Title One Funds



Source: Strengthening Career and Technical Education for the 21st Century Act, Sec 112

In the Minnesota State Plan, sub-recipients are the twenty-six local consortia that serve CTE programs at the secondary and postsecondary levels. These sub-recipients receive the 85 percent formula-based allocations.

The funds allocated to the formula-based distribution category are split between secondary- and postsecondary-eligible recipients as described in the State Plan and illustrated in the chart in figure 3 above. All funds that are not used in the fiscal year awarded are recaptured and reallocated through the formula.

Formula Distribution

Eighty-five percent of the Perkins state allocation flows to the twenty-six Minnesota consortia by formula distribution. This 85 percent is further subdivided into the basic allocation (90 percent of the 85 percent) and the Reserve (10 percent of the 85 percent). Under Perkins V law, states can increase Reserve funds up to 15 percent of the basic allocation. *Note: states determine whether or not reserve funds are awarded and at what level.*

Consortia Basic Allocation

Calculations for the Basic Grant are based on specific attributes of the secondary and postsecondary constituents. While the dates of gathered data will change to utilize the most recent information, the basic formula remains constant.

Secondary Formula (Sec 131)

The secondary formula is based on the most recent U.S. Census data for the population by school district of individuals aged 5-17 and also those aged 5-17 in households of poverty.

Thirty percent of the secondary allocation is based on the following:

- **District population** of individuals aged 5-17, compared to
- **State population** of individuals aged 5-17

Seventy percent of the secondary allocation is based on the following:

- **District population** of individuals aged 5-17 in poverty, compared to
- **State population** of individuals aged 5-17 in poverty

Results for each district are multiplied by the total secondary formula amount for Minnesota from the OCTAE allocation. The secondary consortium formula equals the sum of the amounts calculated for each district member in the consortium.

Postsecondary Formula (Sec 132)

The postsecondary formula is based on the most recent number of postsecondary Pell Grant recipients. It compares:

- The number of Pell Grant recipients in the **college**, enrolled in Perkins-eligible programs, to
- The number of Pell Grant recipients in the **state**, enrolled in Perkins-eligible programs

Results for each college are multiplied by the total postsecondary formula amount for Minnesota from the OCTAE allocation. The postsecondary consortium formula equals the sum of the amounts calculated for each college member of the consortium.

Consortia Reserve Allocation

At the time of publication of this handbook, the state's process for distribution of reserve funds had not been determined. Under Perkins V, Section 112, reserve funds may be awarded to consortia in:

- Rural areas
- Areas with high percentages of CTE concentrators or CTE participants
- Areas with high number of CTE concentrators or CTE participants
- Areas with disparities or gaps in performance

Reserve funds may be used to either foster innovation or promote the development, implementation, and adoption of programs off study or career pathways aligned with high-skill, high-wage, or in-demand occupations.

Federal and Minnesota Legislation

The distribution formulas are based on both the Perkins V Act and the Minnesota State Plan. Here's a brief overview of where more information can be found:

Federal Legislation: Full text of the Perkins V Act is available online through the Perkins Collaborative Resource Network at https://s3.amazonaws.com/PCRN/uploads/perkins_v.pdf.

Minnesota State Plan information: At the time of publication of this document, the Minnesota 4-year state plan had not been completed. Once completed, reviewed and approved, it will be available online at https://minnstate.edu/system/cte/MN_State_Plan/index.html.

State Leadership Funds

(Refer to Section 112 (a) (c) of Perkins V for requirements on distribution of Leadership Funds.)

No more than 10 percent of the state's allocation can be set aside to carry out state leadership activities. Of this portion of the allocation, an amount of not more than two percent must be dedicated to serve individuals in state correctional facilities. Also included in the 10 percent state leadership allocation, an amount not less than \$60,000, and not more than \$150,000, must be used for services that prepare individuals for nontraditional training and employment.

Leadership funds are divided between secondary and postsecondary programs. However, because of internal process and policies, Minnesota awards the majority of the leadership funds to the Minnesota State System Office with the understanding that these funds serve statewide needs such as supporting the annual CTE Works! Summit, the mentorship program, and Continuous Improvement Grants to consortia.

Additional annual leadership projects are awarded through a competitive process with a sponsor/supervisor at the state level.

State Administration Funds

The Perkins V Act, Section 112(a)(3), allows Minnesota to set aside no more than five percent of the state's allocation or \$250,000, whichever is greater, for administration of the state plan. These dollars are limited to the following uses:

- Developing the state plan
- Reviewing a local application
- Monitoring and evaluating program effectiveness
- Assuring compliance with all applicable federal laws
- Providing technical assistance
- Supporting and developing state data systems relevant to the provisions of the Perkins V Act

Dollars set aside for state administration must be matched on a dollar-for-dollar basis from non-federal sources.

FINANCIAL REQUIREMENTS

This section provides for the specific uses of funds for which a consortium is authorized to spend its Perkins allocation and how much must be spent toward each use. Perkins is dedicated to increasing learner access to high-quality Career Technical Education (CTE) programs of study. With a focus on systems alignment and program improvement, this funding is critical to ensuring that programs are prepared to meet the ever-changing needs of learners and employers.

Requirements for Local Uses of Funds

To expend their allocated basic and reserve funds, each consortium develops and submits an annual plan addressing the requirements identified in Sec. 134 of the Perkins V Act. At this sub-recipient (consortium) level, expenditures are based on the approved local application. The following discussion is meant to give guidance to consortia in decision-making.

Sections 131(f) and 132(a)(3) of Perkins V establish the requirements for the use of funds within consortia.

At a minimum, consortium funds must be used only for purposes and programs that are mutually beneficial to all members of the consortium. This presupposes joint planning by the consortium members resulting in programs that are of sufficient size, scope, and quality to be effective. Moreover, a consortium is precluded from allocating resources to members in amounts equal to their original allocations or for purposes and programs that are not mutually beneficial. In other words, funds are distributed according to the consortium-approved plan.

When utilizing Perkins funding expenditures (see Section 135) in the local plan, these expectations must be met:

1. The funding is for the purpose of development, implementation, refinement or support of an approved CTE program or Program of Study.
2. Funding is allocable according to the Perkins V Act.
3. There is no supplanting. You cannot use federal funds to pay for series, staff, programs or materials that would otherwise be paid for with state or local funds. In other words, the expenditure was not previously funded with local funding.
4. The expenditure is reasonable and necessary for the plan's execution.

Supplement versus supplant is a frequent question. Section 211(a) of Perkins V clearly states:

“SUPPLEMENT NOT SUPPLANT—Funds made available under this Act for career and technical education activities shall supplement, and shall not supplant, non-federal funds expended to carry out career and technical education activities.”

Perkins funds shall supplement, not supplant (replace), non-federal funds expended for CTE. If an activity is, or has been, supported by non-federal funds, Perkins funds may not be used to support that activity unless there is overwhelming evidence that the activity would be terminated where it is not supported by Perkins funds.

Seek state advice before proceeding under this exception. If the district or college would normally pay for an item, service, or activity, then Perkins dollars should not be used.

Funds available to consortia under Section 135 of Perkins V shall be used to support CTE programs that are of sufficient size, scope, and quality to be effective and that:

- Provide career exploration and career development activities
- Provide professional development for CTE professionals
- Provide within CTE the skills necessary to pursue careers in high-skill, high-wage, or in-demand industry sectors or occupations
- Support integration of academic skills into CTE programs and POS
- Plan and carry out elements that support the implementation of CTE programs and POS and that result in increasing student achievement of the local levels of performance established under section 113
- Develop and implement evaluations of the activities carried out with funds under Section 135

Refer to Perkins V Section 135 for a complete description of requirements for uses of funds at the local level.

Algorithm for Making Local Funding Decisions

When determining whether or not the use of federal Perkins V grant funds is appropriate, local consortia leadership should consider the following questions:

NEW!

1. Does this use of funds constitute “supplanting” of other funding sources? For example, if an individual’s salary was funded through state funds previously, federal Perkins V funding cannot be used to fund the salary now or in the future unless the job duties have changed and have been documented in a revised position description. The position description must specify which duties are funded with Perkins grant funds and what percentage of the overall duties are funded by federal Perkins grant funds.
2. Is the expense reasonable? Does it meet the intent of size, scope, and quality as specified in the Perkins V law and in the Minnesota state plan?
3. Is the expense necessary? For example, what are the consequences if Perkins funds are not used?

4. Is the expense allocable? For example, does the expenditure comply with the six required uses of funds specified in Section 135(b) of Perkins V and with the Education Department General Administrative Regulations (EDGAR)? Be prepared to identify and describe the following specific considerations as they apply to the expenditure:
 - a. Which Perkins V required use of funds under Section 135(b) is being addressed?
 - b. How does the expenditure support the consortium's POS?
 - c. How does the expenditure support the recruitment, retention, and training of CTE professionals?
 - d. How does the expenditure support special populations as identified in Perkins V?
5. Does your comprehensive local needs assessment support the expenditure?
6. Has the expenditure been vetted with your consortium's governance team?
7. Is the focus of the expenditure on systems alignment and program improvement?

- High-skilled: individuals completing programs resulting in industry-recognized certificates, credentials, or degrees
- High-wage: Above the median wage for all occupations, based on 2018 data from Minnesota Department of Employment and Economic Development
- In-demand: Occupations identified in the Occupation in Demand index (<https://careerwise.minnstate.edu/jobs/hotCareers?re=R01000>) and/or through local needs assessment

Allowable and Unallowable Uses of Funds

Allowable and Unallowable Uses of Funds reflect additional requirements for spending Perkins dollars that are specified by the Education Department General Administrative Regulations (EDGAR), U.S. Office of Management and Budget Circulars, Minnesota State Law, MDE policies and Minnesota State policies. Note that an allowable cost must be referenced in each Consortium Plan.

A general rule to follow is that if an expense was allowable under Perkins IV, it is also allowable under Perkins V.

Under Perkins V law, expenditures that support CTE in the "middle grades" (which includes grades 5 through 8) are now allowable.

Size, Scope, and Quality

Section 135 of Perkins V states, "Funds made available to eligible recipients ... shall be used to support CTE programs that are of sufficient size, scope, and quality" The Perkins V Act does not define size, scope and quality, but instead leaves it to individual states to interpret what that means. Minnesota has defined size, scope and quality as the following:

NEW!

Size

Parameters and/or resources that affect whether the program can adequately address student learning outcomes; this includes:

- Number of students within a program
- Number of instructor/staff involved with the program
- Number of courses within a program
- Available resources for the program (space, equipment, supplies)

Scope

- Programs of study are part of or working toward inclusion within a clearly defined career pathway with multiple entry and exit points
- Programs of study are aligned with local workforce needs and skills
- Postsecondary programs connect with secondary CTE via articulation agreements and/or dual credit, etc.
- Programs develop not only specific work-based skills, but also broadly applicable employability skills

Quality

- A program must meet two of the following three criteria to meet Minnesota's standard of quality: the program develops (1) high-skilled individuals, (2) individuals who are competitive for high-wage jobs, and (3) individuals who are trained for in-demand occupations

ALLOWABLE USES OF FUNDS

NEW!

- CTE Interest, Aptitude, and Ability Inventories (with consortium/state approval)
- CTE-related software (with consortium/state approval)
- CTE student organizations (advisor travel, instructional materials/supplies)
- Charter schools (if part of a consortium and have MDE-approved CTE programs)
- Contracted services
- Curriculum development/curriculum modification—CTE/state-approved programs
- Displays, demonstrations, and exhibits
- Equipment/equipment upgrade (pre-approved) to meet industry standards
- Expenditures for CTE career exploration and awareness down to the middle grades, including grades 5 through 8.
- Food costs for meetings related to CTE programs, working meals only (must have agenda)
- Instructional materials and supplies related to CTE programs
- Marketing and outreach activities related to CTE programs (brochures, videos, flyers, web design)
- Meetings and conferences (registration fees, travel costs) related to CTE programs
- Professional development costs for CTE personnel
- Professional development related to CTE for non-CTE teachers/faculty/counselors (involved in CTE initiatives such as POS, academic technical integration, career awareness activities)
- Professional service costs (consultants)
- Program Advisory Committees

- Program evaluation
- Publication and printing costs related to CTE programs/ activities
- Student recognition awards (certificates, portfolios, trophies) related to CTE
- Substitute pay for teachers, activities, and staff development related to CTE
- Supplemental Support Services for Perkins special populations
- Supportive personnel/instructional aids and devices
- Teacher/faculty CTE in-services
- Training costs (administrative, instructor, Perkins staff)
- Transportation costs incurred for approved CTE programs, workshops, professional development for Career and Technical Student Organization competitions (administrators, counselors/advisors, CTE instructors, Perkins staff)
- Work-based learning activities for CTE teachers and students in approved program

UNALLOWABLE USES OF FUNDS

- Alcoholic beverages
- Alumni/ae activities
- CTE instruction in approved postsecondary programs, shops, labs, and internships not allowed (Secondary salaries may be paid for the first three years of a new program)
- Child care
- Commencement and convocation costs
- Construction, renovation, and/or remodeling of facilities
- Contributions and donations (cash, property, services)
- Entertainment – amusement and social activities (sports tickets)
- Expenditures for non-approved CTE programs
- Expenditures for career education prior to the middle grades (grades 5 through 8)
- Expenditures that supplant
- Fines and penalties
- Fundraising
- Gifts
- Goods or services for personal use
- Items retained by students (supplies, clothing/uniforms, tools, calculators)
- Monetary awards
- Non-instructional furniture
- Postsecondary customized training courses and programs
- Political activities such as contributions, fund raising or lobbying
- Promotional materials (T-shirts, pens, cups, key chains, book bags, etc.)
- Remedial (developmental) courses at both secondary and postsecondary levels
- Scholarships
- Student expenses/direct assistance to students (tuition, tools, fees, car repair, etc.)
- Student stipends
- Vehicles, unless used for CTE instruction

Additional Fund Usage Guidelines

Funds for Support Services (Nontraditional by Gender)

If a college or school district determines a need to fund support services for nontraditional (gender) students, they must develop local guidelines within state and federal laws to provide assistance with dependent care, transportation services, special services, supplies, books, and materials for nontraditional students in CTE-approved programs and/or services.

OCTAE has provided the following guidelines:

- Perkins funds cannot be provided to individual students for the purchase of tools, uniforms, equipment, or materials
- Perkins funds cannot be used for student stipends or tuition
- Child care and transportation may be provided, but not by direct payments to CTE students. Colleges shall establish procedures for payments to vendors for child care and transportation costs
- Costs for public transportation or rates consistent with the cost of public transportation may be allowed only to provide transportation for students to attend a CTE-approved education activity (In areas where public transportation is not appropriate/available, colleges shall develop equitable options for students by providing vouchers or purchase orders)
- Perkins funds may not be used for car parts and/or maintenance

Using Perkins V Resources to Fund Personnel

Postsecondary Perkins: Colleges may not use Perkins V resources to fund instruction within non-credit or customized training courses. Personnel may be funded via the college's Perkins grant in the following cases:

- Personnel are providing service to special populations (as defined by the Perkins V Act), and/or
- Personnel are assigned to other functions and/or projects designed to improve CTE as specified in the college's currently approved Perkins Local Application Plan

In all cases the following conditions must be met:

- Job descriptions are written and kept on file at the time of employment for each individual
- Personnel Activity Reports are filled out and filed for each employee
- Perkins funds are not supplanting state funds
- Only that portion of a person's time assigned to Perkins-related functions and/or activities are funded via the Perkins Grant

Personnel who are compensated in whole or in part with federal grant dollars are required to report on their duties/ activities funded under the grant. This time and effort reporting, or Personnel Activity Reporting, reflects how teachers, faculty, and/or staff spent the time for which they were compensated through federal grant funds. For the sake of the Perkins grant, we refer to these as Personnel Activity Reports (PARS).

The purpose of federally mandated time and effort reporting is to provide documentation to substantiate payroll charges. For example, if 25 percent of an individual's time was charged to a federal grant, time and effort reports must substantiate that the individual spent at least 25 percent of their time working on activities to support that federal grant. Time and effort reports must be a single, certified document that reflect 100 percent of an employee's time worked in a given period.

OMB Uniform Guidance Subpart E §200.430 contains the federal regulatory requirements for time and effort reporting.

Using Perkins V Resources to Fund Postsecondary Perkins Programs

Postsecondary, credit-based programs: Perkins V resources may only be used by colleges for program expenditures relating to students pursuing an approved program as identified in the Minnesota State System Office program inventory database. The student must be pursuing a program that is identified by a Classification of Instructional Program (CIP) code in one of the 16 career clusters designated as "Perkins eligible."

To be eligible, the program must, among other requirements, terminate in a certificate, diploma, or an associate of applied science (AAS) or associate of science (AS) degree.

Postsecondary Customized Training Courses and Programs

Perkins V resources may not be used by colleges for program expenditures related to students pursuing non-credit courses and programs within customized training or employer-sponsored training programs. For example: Perkins funds may not be used for costs related to providing customized training for ABC Corporation.

Field Trips and Student Transport Activities

Field trips and student transportation activities that are in direct support of CTE students and programs are allowable under the Perkins grant funding. This can include middle-school, career-awareness activities that support CTE program enrollment at the high-school level. This funding may not be used for support of individual classes at the middle-school level.

If the field trips/activities are listed, budgeted, and approved as part of the annual Perkins consortium grant application, additional pre-approval is not required. Field trips and student transportation activities that are not listed in the original approved grant must be pre-approved if the cost of the activity exceeds the \$1,000 threshold.

Career and Technical Student Organization (CTSO) Activities

- Individual student lodging, and meals do not qualify as a permissible Perkins expenditure
- Advisor travel, lodging and meals must include staff-development activities for licensed CTE staff (Perkins funds are not allowable for chaperones only)
- All Perkins funding recipients must be licensed CTE teachers/administrators or counselors
- Perkins funding can be used for the purchase of branded organizational materials as long as those materials remain

the property of the program and are not distributed to individual students upon program completion

- All members of the student organization or class/program must have an opportunity to participate in the funded activity (This opportunity may reflect qualifying competitive performance or participation)

Career Development License and Activities

Specific licenses for career development activities, i.e. Minnesota Career Information System, Naviance, etc., do not require additional permission if they are currently reflected in the local Perkins application budget approved by MDE. Pre-approval is not required for these expenditures; however, if they require a budget modification or change, this must be approved through the budget maintenance system.

Perkins V – 5 percent Administrative Cost Allowances

Perkins V allows eligible consortia to use up to, but not more than, 5 percent for administrative costs. Administration is defined as activities necessary for the proper and efficient performance of the eligible fiscal and data collection responsibilities under the Perkins V Act.

Fiscal Year Expenditure Timelines

Perkins V does not allow colleges or school districts to carry over unexpended funds from one fiscal year to the next. All expenditure orders must be encumbered by June 30 of the Local Application State fiscal year. Attempts should be made to pay all invoices by June 30 of the Local Application State fiscal year or shortly thereafter. Business processes need to be concluded on or before July 31. Any expenditure payments to be made after July 31 must be cleared through the Minnesota State System Office Grants Accountant or MDE fiscal personnel.

Local consortia are responsible for prudent cash management. Greater than 50 percent of the funds should be spent by the 3rd quarter of the fiscal year. Review of cash management should be an agenda item at every consortium leadership meeting.

Local Application Budget Changes within the Fiscal Year

Postsecondary Budget Changes

Fiscal year local application budget changes of \$10,000 or more must be pre-approved before the expenditure(s) can be made.

They must also:

- Identify the original purpose for which the funds were identified and the amount
- Identify the proposed change(s) in expenditures and the amounts
- Provide the rationale for the requested change, including how the change is supported by CLNA results

- Send the request to the State Director for approval
- Provide any follow-up clarification as requested
- Receive written action on the change request

All this communication can occur through email. There is not a separate form for postsecondary change requests. All budget changes will be recorded as part of the College Perkins V file.

Secondary Budget Changes

During the fiscal year, local application budget changes of 10 percent or more, within a UFARS line item, must be pre-approved before the expenditure(s) can be made. To request a change, you must:

- Identify the original purpose for which the funds were identified and the amount
- Identify proposed change(s) in expenditures and the amounts
- Provide the rationale for the requested change, including how the change is supported by CLNA results
- Send the request to the MDE Secondary Perkins Coordinator for approval
- Provide clarification and follow-up as requested
- Receive written action on the change request

All budget changes will be recorded as part of the Secondary Perkins V file.

Capital Assets (Equipment)

Equipment purchases must be permissible according to Perkins V, Section 135(b). Allowable use, disposition, and record-keeping requirements as defined by Education Department General Administrative Regulations (EDGAR) must be followed. You must also follow policies set forth by Minnesota State Board policy 7.3.6 for postsecondary and MDE UFARS policy Chapter 5, section 500.

Requirements for Purchasing Equipment with Federal Grant Funds

[Source: *The Administrator's Handbook on EDGAR*, published by Brustein & Manasevit, PLLC, *Grants to Nonprofit Organizations*, 34 CFR Part 74 (f1-6), Page 16-17]

§ 74.34 Equipment

(f) The recipient's property management standards for equipment acquired with Federal funds and federally-owned equipment shall include all of the following:

- (1) Equipment records shall be maintained accurately and shall include the following information:
 - (i) A description of the equipment.
 - (ii) Manufacturer's serial number, model number, Federal stock number, national stock number, or other identification number.
 - (iii) Source of the equipment, including the award number.
 - (iv) Whether title vests in the recipient or the Federal Government.

- (v) Acquisition date (or date received, if the equipment was furnished by the Federal Government) and cost.
- (vi) Information from which one can calculate the percentage of Federal participation in the cost of the equipment (not applicable to equipment furnished by the Federal Government).
- (vii) Location and condition of the equipment and the date the information was reported.
- (viii) Unit acquisition cost.
- (ix) Ultimate disposition data, including date of disposal and sales price or the method used to determine current fair market value where a recipient compensates ED for its share.

- (2) Equipment owned by the Federal Government must be identified to indicate Federal ownership.
- (3) A physical inventory of equipment must be taken, and the results reconciled with the equipment records at least once every two years. Any differences between quantities determined by the physical inspection and those shown in the accounting records must be investigated to determine the causes of the difference. The recipient shall, in connection with the inventory, verify the existence, current utilization, and continued need for the equipment.
- (4) A control system must be in effect to ensure adequate safeguards to prevent loss, damage, or theft of the equipment. Any loss, damage, or theft of equipment shall be investigated and fully documented; if the equipment was owned by the Federal Government, the recipient shall promptly notify the Secretary.
- (5) Adequate maintenance procedures must be implemented to keep the equipment in good condition.
- (6) Where the recipient is authorized or required to sell the equipment, proper sales procedures must be established which provide for competition to the extent practicable and result in the highest possible return.

Postsecondary Equipment Documentation

Documentation of equipment must comply with federal requirements, Minnesota State Colleges and Universities Board Policy, and institutional policies.

- Minnesota State's policy requires purchases of \$10,000 or more to be recorded as equipment
- The federal government requires purchases for \$5,000 or more to be recorded as equipment
- Institutional policies determine sensitive equipment guidelines

Equipment and capital assets are recorded and maintained in the equipment module within Minnesota State's ISRS program.

- Equipment of \$10,000 or more is to be expensed with object code 4000 (equipment)
- Equipment purchased between \$5,000.00 and \$9,999.99 is to be expensed with object code 3006 (sensitive equipment)
- Equipment under \$5,000, and determined to be classified as sensitive (e.g. computer equipment) is to be expensed with object code 3006

- Designate a unique Department Number in the equipment module to record equipment purchased with Perkins grant funds
- All equipment purchased with Federal dollars must have specially marked asset tags
- Asset tag must include the asset number and verbiage indicating equipment was purchased with either “Federal” or “Perkins” funds (See example in Appendix C).
- Equipment purchased with Federal funds requires a physical inventory at least every two years, with proof of the inventory process
- Record physical inventory date in the equipment module
- Equipment reconciliation at least annually, or more often, as determined by System Office recommendation and requirements
 - o Run an EPM11 transaction report, filtered by object codes 4000 and 3006, and FPK appropriation
 - o Run equipment module report, filtered by the designated department number
 - o Compare to ensure all equipment purchased with Perkins grant funds are listed in the equipment module with the unique department code
 - o Run Fixed Asset Reconciliation equipment module report

Secondary Equipment and Curriculum Funding Criteria

Information in this section is taken from MDE’S Secondary Equipment, Curriculum and Approved Uses of Carl D. Perkins Funds, August 2019. Full text can be found at <https://education.mn.gov/MDE/dse/cte/pol/perk/>

For Uniform Financial Accounting and Reporting Standards (UFARS) reporting, equipment or technology qualifies as a capital expenditure if the item meets all of the following criteria:

1. It retains its original shape and appearance with use. It has a normal useful life extending beyond a single reporting period.
2. It is nonexpendable, that is, if the article is damaged or some of its parts are lost or worn out, it is usually more feasible to repair it rather than replace it with an entirely new unit.
3. It does not lose its identity through incorporation into a different or more complex unit or substance.

A more complete description may be found in Chapter 5 of the 2015 UFARS manual.

The three components of the above definition of equipment must be followed by Independent School Districts throughout Minnesota. District policy may add additional components to the equipment definition, but all school district policies must support the three criteria listed above.

Criteria for Secondary Perkins Funded Purchases

- Classroom/lab equipment and curriculum/licensure funded through Perkins must be used to support courses within a state-approved CTE program
- The CTE course must be taught by a CTE-licensed teacher holding a current CTE license in that discipline (Alternative licenses, such as community expert, variance, or special restricted license will qualify for Perkins funding)
- All Perkins-funding recipients must be licensed CTE teachers/administrators or counselors unless special permission has been granted (A variance, waiver, special assignment, or designation as community expert is required)
- All Perkins-funded purchases must support CTE students
- Perkins funding must not be used to supplant existing (non-federal) funding sources
- Equipment purchased through the Perkins grant must have the priority of use dedicated to CTE students — however, incidental use by CTE-related students is allowable
- Perkins grant use for any portion of this funding requires adherence to the above criteria (Equipment purchased through the Perkins grant must have the priority of use dedicated to CTE students; however, incidental use by CTE-related students is allowable)
- Funding for classroom/lab equipment and curriculum/license may come from multiple sources (Perkins grant used for any portion of this funding requires adherence to the above criteria)

Requirements for State Pre-Approval of Secondary Equipment Purchases

Secondary equipment and curriculum purchases that equal \$1,000 or more require pre-approval before the consortium authorizes the district to make the expenditure from Perkins grant funds. (This \$1,000 threshold is per individual unit of equipment or curriculum.)

Perkins consortia that have listed an individual expenditure for equipment and/or curriculum as a budget line item in their approved annual Perkins application are not required to resubmit the same equipment/curriculum expenditure for state approval. All inventory control (tagging, record keeping, reporting) requirements remain the same.

Secondary Equipment and Curriculum Purchases-Grant Management

MDE approval of the annual Perkins consortium application establishes a fiduciary relationship between the Perkins consortium and MDE. Because of this relationship, all secondary equipment approval requests must be submitted from and granted to the secondary Perkins Consortium Coordinator of record.

All secondary equipment and curriculum purchases, inclusive of those under the \$1,000 threshold, must be included in the Perkins consortium’s equipment inventory list. A master Perkins Consortium Equipment Inventory should be reviewed annually, and an onsite inventory is required every two years.

All equipment and curriculum items purchased with secondary Perkins funding must be identified (tagged) and included in the building inventory of the school district where it is located. On-site inventory is required every two years according to the EDGAR Grant Regulations, found at <https://www2.ed.gov/policy/fund/reg/edgarReg/edgar.html>.

All equipment and curriculum items must be tagged as purchased with Perkins federal funds. These items must be included in the consortium filed Consolidated Annual Report (CAR) at the end of the Perkins fiscal year.

Inventory Control Requirements for Secondary Equipment and Curriculum Purchased Through Perkins Grant Funding

The responsibility for maintaining inventory control of secondary equipment and curriculum purchased with Perkins funding remains with the Perkins consortium. Consortia are requested to have a single “master” inventory directory which is validated/reconciled at least every two years. Inventory control is required for all equipment and curricula purchased with Perkins grant funds.

Inventory control records should include the following:

- Equipment/curriculum description (serial numbers, model numbers, physical description, etc. as applicable)
- Date of acquisition
- Original expenditure/percent of grant funding
- Source of equipment/curriculum
- Location and condition of equipment/curriculum (school building, room location, CTE-approved program(s))
- Space for inventory record—inventory procedures may follow school district policy—Perkins equipment/curriculum inventory is required every two years
- Corresponding physical tag number when applicable
- Space for final disposition of equipment
- When possible, a physical tag should be permanently fastened to, or stamped on, each item of equipment/curriculum indicating Perkins funded expenditure. This tag must be identifiable to the inventory record

Disposal of Equipment/Curriculum Purchased Through the Secondary Perkins Grant

The disposition of equipment that has been purchased with federal funds through a Minnesota Secondary Perkins Consortium as part of a CTE program should be disposed of by using the following procedure:

1. All equipment/curricula purchased through the Perkins consortium must be disposed of through the original assigning consortium.
2. The original assigning consortium whose school districts are disposing of equipment with a current value of \$5,000 or more must coordinate disposal with MDE and the United States Department of Education using general administrative regulations guidelines EDGAR 80.32 (C).
3. Disposal of equipment that has a current value of \$1,000 or more, but less than \$5,000 must be coordinated with MDE. The original assigning consortium must provide to MDE a list of said equipment to allow support for repurposing this equipment to another consortium.

4. Equipment that has a current value of less than \$1,000 may be disposed of through the local Perkins consortium. (See note below.)
5. All disposition of equipment must be reported on the annual CAR report. The respective consortium inventory must reflect the disposal.
6. Equipment disposal records including inventory documentation, disposal, salvage recovery funds and any transfer information need to be retained by the consortium for three years.

Note: Before equipment is disposed of, the consortium must make an effort to repurpose the equipment to support a CTE program in another member district. Technical support for these efforts will be available through MDE

Perkins Funding for Curriculum Software/License

- Acquisition and disposal of curriculum software/licenses follow the same guidelines as stated above for equipment
- Perkins funding is not a sustainable long-term funding source for secondary initiatives (Consequently, license and curriculum program funding are restricted to one or two years of support)
- Inventory control must be maintained in the same manner that was recommended for equipment

Perkins V Finance Cost Centers (Minnesota State)

Part 1: Federal Requirements

Federal requirements stipulate that each grant award activity deliver reports with the following attributes:

- Data consistency
- Report reproducibility
- Clear audit trail
- Ability to create consolidated annual reports

Part 2: Types of categories

For each annual grant award, the Business Office at the System Office will assign unique general ledgers for the following categories with corresponding procedures: (*NOTE: Colleges must use the general ledger (GL) provided by the System Office.*)

Basic Grant – General Ledger (GL)

- The System Office Grants Accountant will assign a general ledger number for each new grant that should be used throughout the entire two-year grant period (Year two refers to reallocated dollars)
- A separate cost center must be set up for administration (A minimum of one other cost center must be established for the basic funds)
- Colleges must load the budgets per awarded amounts into ISRS — the Integrated Statewide Record System (The total across all basic cost centers must equal the award)
- The local application must be approved by the Minnesota State Director for Career and Technical Education before any obligation of basic expenses
- Per the Perkins V Act, Minnesota State will recapture

unused funds at the close of the state fiscal year (Around Aug. 15 of each year)

Reserve Funds– General Ledger (GL)

- The System Office Grants Accountant will assign a general ledger number for each new grant that should be used throughout the entire two-year grant period (Year two refers to reallocated dollars)
- A minimum of one separate cost center must be set up in the reserve funds GL
- Colleges must load the budgets per awarded amounts into ISRS (The total across all reserve cost centers must equal the award)
- The local application must be approved by the Minnesota State Director for Career and Technical Education before any obligation of reserve expenses
- Per the Perkins V Act, Minnesota State will recapture unused funds at the close of the state fiscal year (Around Aug. 15 of each year)

Reallocated Funds– General Ledger (GL)

- After the grant has been closed for the fiscal year, the Minnesota State System Office will recapture the unused Basic and Reserve funds from the postsecondary colleges (The recaptured funds are reallocated to local consortia according to a formula set forth by Perkins V. Local consortia are notified of the reallocated award no later than the end of February)
- The previous year's Basic Grant GL will be reused for the Reallocated Basic Grant GL, and the previous year's Reserve Funds GL will be reused for the Reallocated Reserve Funds GL
- A minimum of one cost center for each plan in the local consortium-approved application for the Basic Reallocation grant must be set up in the Reallocated Basic Grant GL (In addition, at least one cost center per Reserve Reallocation plan must be set up in the Reallocated Reserve Funds GL)
- Colleges must load the budgets per awarded amounts into ISRS (The total across all cost centers must equal the award)
- The local application must be approved by the Minnesota State Director for Career and Technical Education
- Per the Perkins V Act, unused reallocated funds cannot be reallocated to the consortium

Leadership – General Ledger (GL)

- **Intra-Agency Agreements:** The System Office and colleges sign agreements for specific leadership projects.
- Colleges incur expenses covered by the agreement
- After all (or partial, depending upon the agreement) expenses have been incurred, colleges generate an invoice(s) and send the invoice to the System Office (The receivable should be set up with the unique cost center that was established for the expenditures, with object revenue code 9806)
- Upon receiving the remittance from the System Office, colleges receipt the funds to the outstanding receivable, recording an off-setting revenue
- Leadership expenditures are not included with the standard draw (See Part 3 below)

Special Temporary Assignment of Campus Personnel Agreement

- When a system college, as the primary employer, is engaged to provide services of its employees on a temporary basis to the System Office or another system institution, an Approval Letter or Intra-Agency Agreement must be used.
- An Approval Letter will be used if the assignment will result in a one-time payment of \$500 or less
- Revised Intra-Agency Agreement Guidelines will be used if the assignment results in multiple payments or payment of \$501 or greater
- It is essential that the parties at both institutions representing Academic Affairs, Human Resources, and Finance be consulted prior to the execution of the agreement
- The process for reimbursement of expenditures by the contracting party to the service provision party should be clearly identified
- The home location will enter the assignment in the State College and University Personnel Payroll System (SCUPPS) with a category code created in SCUPPS to specifically identify FTE from another system location. This is essential for reporting purposes in Academic Affairs
- This process is intended to be used for hires between a campus and the System Office and, where applicable, between two campuses

Sub-grants General Ledger (GL)

Sub-grant agreements can be made from one college to another recipient college.

The recipient college (entity receiving grant funds from another college) records the actual grant expense and:

- Incurs permissible expenses and pays the expenditures from the applicable Basic, Reserve, Reallocated Basic, or Reallocated Reserve GL(s)
- Invoices the granting college for the incurred expenses. Invoice should be set up to distribute the receivable based on the expenditure's cost center
- Uses payments from the granting college to grant revenue (Object code 9401)

The granting college (entity reimbursing another college) uses grant revenue as a pass through for both grant expenses and grant revenue to:

- Pay the invoice from the recipient college by debiting grant revenue (object code 9401) in the applicable Perkins GL(s) used by the recipient college. Do not use an expense object code
- The remittance amount (negative revenue) will be included in the next System Office draw request. The sub-grant portion of the funds received from the System Office should be receipted to grant revenue (object code 9401) to the applicable Perkins GL(s) associated with the invoice
- Grant revenue will have offsetting debit and credit entries

Part 3: Fiscal Year Expenditure Timelines

The Perkins V Act does **not** allow colleges or school districts to carry-over unexpended funds from one fiscal year to the next.

All expenditure orders must be encumbered by June 30 of the local application fiscal year.

Attempts should be made to pay all invoices by June 30 of the local application fiscal year or shortly thereafter. Any payments to be made after July 30 must be cleared through the System Office Grants Accountant.

Part 4: Expenditure Reimbursement Process (Draws)

Basic Grant, Reserve Funds, Reallocated Basic Funds, and Reallocated Reserve Funds will be reimbursed as follows:

1. Set up cost center(s) with budget(s) totaling the award amount.
2. System Office Grants Accountant reviews the Perkins cost centers associated with the current fiscal year for all colleges and determines the amount eligible for reimbursement.
3. System Office Grants Accountant requests a drawdown from the Perkins fund maintained at the U.S. Department of Education to reimburse the colleges.
4. System Office Grants Accountant enters a deposit into SWIFT for the drawn amount.
5. System Office Grants Accountant sends an email to the fiscal contacts notifying them of the amount of the SWIFT deposit, and the specific amounts to receipt to which designated GLs.
6. College fiscal contacts receipt the funds in ISRS to grant revenue (object code 9401), using Perkins cost center(s) associated with the designated GLs.

Minnesota State grant management system. Secondary Perkins Coordinators should always check with MDE or CTE staff for the most updated version of the secondary supplemental budget spreadsheet.

All grant opportunities within MDE are found in the Grants Management directory of the SERVS Financial System.

WorkForce (CareerForce) Center Collaboration Expenditures

Postsecondary CTE programs, assisted under the Perkins V Act, are mandatory partners in the one-stop career center delivery system established by the CareerForce Centers and continued in the current WIOA legislation. Colleges are encouraged to collaborate with their one-stop partners. However, as specified in the local application, colleges must report all direct and indirect resources that were used in collaborative efforts with CareerForce Centers each fiscal year.

SERVS Financial System at MDE

Secondary Perkins: Secondary programs are required to report expenditures using the Uniform Financial Accounting and Reporting System (UFARS) through the State Educational Record View and Submission (SERVS) Financial System.

The SERVS Financial System is a password-protected website for members of secondary educational organizations who have received prior approval to submit grant applications and create budgets, approve transactions, request fund reimbursement, or simply view grant applications and the budget management process. It can be accessed at <https://w1.education.state.mn.us/EGMS/>.

Secondary fiscal agents will use the SERVS Financial System to submit their Perkins applications, budgets, and expenditures. The fiscal agent will submit the consortium application and budget through the SERVS Financial System website. Once applications are approved, consortia will submit their expenditures through a drawdown request. Reimbursements will be made based upon the drawdown request.

Expenditures must be reported each year in the secondary budget for the Perkins V Annual Performance Report (APR). The required Secondary Supplemental Budget is usually emailed to Perkins Coordinators by MDE staff or it may be found on the

MONITORING

Minnesota's Perkins V Monitoring Process

Minnesota State and MDE are required to monitor local Perkins consortia to assure compliance with fiscal and management requirements of the Strengthening Career and Technical Education for the 21st Century Act, the Minnesota State Career and Technical Education Plan, as well as federal and state legislation, rules regulations, and policy.

Purpose

The monitoring review not only provides an opportunity to meet compliance requirements, but also to provide technical assistance, foster continuous improvement, and develop a better understanding of local performance, operations and issues facing CTE programs, schools, and colleges.

Objectives for Perkins Monitoring

- Determine present and predict future CTE program opportunities, challenges, and threats
- Better define how high-quality CTE programs operate
- Detect conditions, procedures, or factors that threaten CTE programs in time to effectively mitigate them
- Identify factors that may enhance or detract from the availability of high-quality CTE programs

Implementation Priorities to be Examined During 2019-2024

- Development of a collaborative leadership team and decision-making process
- Progress in developing Programs of Study
- Engagement in data-driven planning and decision-making in conjunction with the Comprehensive Local Needs Assessment
- Fiscal/financial responsibilities and cash management

Guiding Questions to be Addressed

- What are the consortium's greatest strengths related to student outcomes? Greatest challenges?
- To what degree and in what ways do the consortium's plans and policies adequately support the strengths and include strategies to address the challenges?
- Who are the stakeholders involved in the consortium planning and decision-making, and how do they contribute to the consortium's success?
- To what degree and in what ways does the consortium engage in data-driven planning and decision-making?

Local Consortium Monitoring Guidelines

Each consortium must provide evidence that the consortium is meeting the fiscal and programmatic requirements of the Perkins V Act and Minnesota Perkins requirements. In addition, state CTE staff meet with and provide technical assistance to local teams as they prepare for the monitoring visit. Monitoring guidelines and resources are made available online on the CTE website at

<https://minnstate.edu/system/cte/directories/portal.html>. See Appendix A for a sample agenda for monitoring visits.

Selection of Sites to be Monitored

Based on the risk assessment model utilized at the federal level by the Office of Career, Technical, and Adult Education (OCTAE), a division of the U. S. Department of Education, Minnesota selects the sites to be monitored. The risk assessment reviews defining factors that may indicate excessive challenges to program implementations by the local consortia. All twenty-six Minnesota consortia will be monitored under Perkins V criteria and will continue to be monitored following the risk assessment process.

Risk Assessment Tool

A risk assessment tool is used to prioritize consortia to be reviewed, as well as the level and frequency of monitoring to be performed. The Office of Management and Budget (OMB) Circular A-133 provides guidance on evaluating sub-recipient risks.

Risk assessment criteria include target areas that help identify changes critical to assessing the consortium's risk level:

- Fiscal processes and patterns
- Targets met on state-recognized levels of performance
- Evidence of data-driven decisions
- Evidence of unified planning and decision-making
- Stable leadership/governance
- Service to special populations
- State-recognized Programs of Study

The state may consider the use of additional information in assessing the sub recipient's risk level. Potential risk factors to be assessed to determine sites for monitoring visits include: program performance, fiscal operations, and data reporting. In addition, the state may consider randomly selecting consortia to assure each consortium is monitored during the lifetime of the Act.

Program Performance

Sites identified for monitoring visits may be identified based on program performance. Sites exhibiting excellent performance often provide valuable insight into how a consortium achieves goals and objectives in unique or innovative ways, and what effective strategies are being used that may be replicable in other consortia. Sites identified because of problems with performance might be chosen for monitoring because the consortium is having difficulty achieving goals and objectives, there are known compliance issues or, fiscal improprieties that are identified from desk audit activities, or the consortium has requested, or requires targeted technical assistance.

Fiscal Analysis

Perkins monitoring must also examine several aspects of potential fiscal risk. Factors likely to prioritize a consortium's selection for monitoring include:

- Recapture of a notably higher ratio of unspent funds
- A large total allocation
- Single audit findings from the Office of Management and Budget Circular A-133

In order for state CTE leaders to assure recipients' fiscal operations are reviewed at least once during the lifetime of the Act, additional criteria may be necessary to select consortia targeted for a fiscal desk audit.

Data Reporting

In order to apply the risk factor selection criteria, current data must be available for each recipient. Therefore, if a consortium is unable to submit data, such as enrollment figures, or local plans and budgets, it becomes necessary for the consortium to be selected for a review.

Other Factors

Historical information, anecdotal information from employees, clients, and participants, future changes, and a variety of other factors may be appropriate in determining the sub-recipient's need to be monitored.

Types and Levels of Monitoring

Based on the results of the risk assessment, a sub-recipient (Minnesota consortium) could be assessed as being a low, medium, or high risk. These risk levels will determine which monitoring standards and procedures the monitors use.

High-risk consortium methods for conducting monitoring of a high-risk consortium must be more intensive than methods for reviewing consortia determined to be at other risk levels. The basic objectives of high-risk monitoring are:

- To test the reliability of internal controls
- To verify that program objectives are being met
- To assure the reliability of the consortium's financial and programmatic reports
- To examine if costs and services are allowable and eligible

In addition to more intensive testing of financial and program data and reporting, high-risk monitoring may involve a combination of site visits, quarterly performance calls, quarterly desk reviews, telephone interviews, and reviews of questionnaire results. High-risk monitoring will continue until improved performance and fiscal propriety are assured.

Medium-risk consortia will be monitored for compliance issues focusing on allowable costs and program eligibility. The basic objectives of medium-risk monitoring are:

- To verify that program objectives are being met
- To test the reliability of the consortium's financial and programmatic report
- To test if costs and services are allowable and eligible

Low-risk consortia will be monitored for operational changes. Low-risk monitoring might include a desk review, conducting a limited number of phone interviews, or analyzing the results of a survey. The objective of the low-risk monitoring is to identify major operational changes. Based on the desk review, telephone interviews, or results of the questionnaire, a determination will be made whether or not to revise the initial risk assessment and to conduct additional monitoring.

Minnesota Criteria and Sources of Evidence for Monitoring 2019-2024

Five criteria will be used to evaluate performance during the 2019-2024 monitoring visits. The state will provide consortia with a chart of criteria and courses of evidence in preparation for the visit.

In addition, each consortium must provide evidence related to each criterion for which the consortium had a finding in its prior monitoring report (see table 5).

Structure of Monitoring Visits

Who participates in the monitoring visit?

Participants in the meetings associated with a consortium site visit may vary, depending on the governing and operating structure within a consortium. Generally, it is essential to include your primary secondary and postsecondary consortium contacts, as well as your fiscal hosts. Those individuals should plan to be available throughout the entire visit in case questions arise or additional information is needed.

A typical monitoring visit is scheduled to last two days. It is recommended to invite Perkins leaders from each school and college within the consortium to the opening and exit meetings as well. These leaders may include principals, superintendents, chief academic officers, chief student affairs officers, deans, and participating business or community leaders who are involved in CTE efforts.

What facilities and logistical needs are there for monitoring visits?

The consortium should decide where the monitoring visit occurs within the consortium.

Generally, plan on a meeting room for the opening and exit meetings that is adequate to hold the number of attendees expected and the State Perkins monitoring team.

The monitoring team also needs a room where documentation will be reviewed. The room should offer enough space for a three- to five-person monitoring team. This room should also be a secure location (accessible with a key or security badge) as fiscal, operational, and accountability data will be stored there during the visit. A second room for small meetings should be available during both days as well.

The monitoring team will need wireless internet access and access to a printer during the visit.

Table 5: Criteria and Sources of Evidence

FIVE CRITERIA	SOURCES OF EVIDENCE
CRITERION 1: Consortium engages in structured and collaborative planning that benefits the consortium as a whole and is focused on local/regional resources and needs.	<ul style="list-style-type: none">• List of consortium members and member organizations• Consortium meeting minutes that reflect attendance and highlight processes, procedures, and actions of leadership team that demonstrate joint planning and collaboration among consortium partners for the benefit of the entire consortium• Other records that highlight how the consortium has created structure and procedures for joint planning and collaboration
CRITERION 2: Secondary and postsecondary institutions will maintain all financial records according to the Uniform Fiscal Accounting Recording System (UFARS) for secondary programs and Cost Centers for postsecondary programs. Costs associated with the administrative activities under this grant are not to exceed 5 percent of the grant. Uses of funds must follow the Perkins law and state requirements for uses of funds and allowable/unallowable expenses.	<ul style="list-style-type: none">• Fiscal income• Payroll and expenditure records for secondary and postsecondary institutions• Administrative expenditures• Fiscal desk audits and results from both secondary and postsecondary programs• Personnel Activity Reports (PAR)• Historical records to show that funds supplement, not supplant expenditures for CTE programs and activities• Equipment is labeled to reflect property of CTE program – single inventory combining secondary and postsecondary equipment/assets• Description of funds allocation process (if used) and connection to CLNA
CRITERION 3: Programs provide occupational skill development for students to at least the level of job entry.	<ul style="list-style-type: none">• Placement or matriculation information for completers one year after graduation• Use of, and results from, Technical Skill Assessments and/or certifications. Include information about when assessments are administered within the curriculum/course sequence
CRITERION 4: Collaboration among secondary and postsecondary, community-based organizations, non-profits, etc. are in place and promote CTE program efforts.	<ul style="list-style-type: none">• Examples of completed and current initiatives• Examples of brokering of services for students• Regional articulation• Linkages to Adult Basic Education and/or CareerForce Center partners• Partnerships with community-based and philanthropic organizations
CRITERION 5: Programs provide a coherent sequence of courses through a Program of Study (POS) that meets state-recognized POS requirements and reflects continuous improvement work. <ul style="list-style-type: none">• Articulation agreements• College in the Schools• Concurrent enrollment• Postsecondary enrollment options—access to programs at the postsecondary campus• Must provide evidence of six active state-recognized CTE Programs of Study (POS)	<ul style="list-style-type: none">• Annual report of at least six CTE state-recognized Programs of Study from the Minnesota Programs of Study website or its equivalent• Consortium self-evaluation of state-recognized Programs of Study. (This self-evaluation should be completed and updated annually by the consortium on the Minnesota Programs of Study website or its equivalent)

There is no need for the consortium to provide refreshments or meals for the monitoring team during their visit, though access to coffee or water and information about nearby food establishments is helpful.

What evidence is needed and how does it need to be organized?

Collect evidence that documents consortium activities and compliance with each of the required criteria and activities addressed in the consortium plan for the monitoring year.

Create a document that lists each piece of secondary and postsecondary evidence by title of document and specific webpage (if applicable). Have the evidence available electronically for the team to review one week prior to the on-site visit.

Consider using an electronic portfolio, making sure to note evidence with the criterion number. Organized Word documents or scanned documents may also be submitted. This allows the team to have an overview of the evidence prior to the visit—so that in-person time during the visit can be better utilized for interviews and discussions.

Who is the contact for questions about preparing for a monitoring visit?

The State Perkins team offers individualized assistance in planning a monitoring visit. Contact the Associate Director for Career and Technical Education at Minnesota State for technical assistance to plan a monitoring visit. Several resources are made available to help you plan your visit and can be found on the Minnesota State CTE website <https://minnstate.edu/system/cte/directories/portal.html>.

Fiscal Desk Audit

Secondary and Postsecondary Desk Audit Process

Minnesota State and MDE grant accountants will notify both secondary and postsecondary fiscal contacts identified in the approved consortium plan of which transactions will be reviewed.

- Approximately 30 days prior to the monitoring visit, fiscal contacts will be notified of desk audit requests
- The fiscal contacts will provide all supporting documents to grant accountants within ten days of the request or ten days prior to the visit, whichever is sooner
- Supporting documents would include invoices, purchase orders, packing slips, special expense request forms, M16-A forms, employee expense forms, any notes and correspondence, and other relevant documentation related to the expenditure transactions
- Supporting asset documentation would include system-generated inventory reports, asset reconciliation reports, physical inventory reports, and evidence of asset tags
- The grant accountants will review the documentation and request any additional information if needed
- Within five days, the local consortium fiscal contacts respond and provide the additional information to the grant accountants

- Depending upon the above time line, approximately five days prior to the visit, grant accountants will send preliminary findings to the fiscal contact, chief financial officer (CFO) and the monitoring team
- During the monitoring visit, a member of the monitoring team meets with the fiscal contact and/or CFO to review any questions, findings and required corrective actions and timelines
- The day of the monitoring visit, a consortium asset list combining the secondary and postsecondary assets is required (The format of the combined list is at the discretion of the consortium)
- Any fiscal findings and corrective actions will be included in the final monitoring visit and audit report
- Within the timeline specified in the fiscal corrective actions, the fiscal contacts are to provide documentation of the completed corrective actions taken to the grant accountants and the monitoring team

Reviewers are looking for responsible cash management, a noticeably higher ratio of unspent funds to allocated funds, and greater than 50 percent of funds being spent by the third quarter of the fiscal year. Equipment inventory should be reconciled at least annually, and physical inventory must be reconciled every two years.

Fiscal Audit Criteria

- Run a query of all expenditure activity, including payment of invoices and correcting entries.
- Provide a random sample of 3-5 percent of non-payroll transactions, depending on the volume of transactions, with a focus on larger transactions, and including at least one correcting entry
- Minnesota State and MDE will review documentation provided for:
 - o Completed, signed, and approved required documentation
 - o Invoices
 - o Encumbrances
 - o Special Expense forms
 - o M16-A forms
 - o Consistency with State of Minnesota statutes, Minnesota State Board policies, MDE policies, and GASB/GAAP
 - o Perkins-eligible expenses
 - o Potential fraud
 - o Comparing equipment and asset reports to transactional activity
 - o Cash management patterns

OFFICE OF CIVIL RIGHTS REVIEWS

Postsecondary

The United States Department of Education Office for Civil Rights requires civil rights reviews for colleges that receive federal funds from the *Strengthening Career and Technical Education for the 21st Century Act*.

The Civil Rights review process consists of a two- to four-day on-site review of a college to determine compliance with Civil Rights standards and guidelines. The Civil Rights review for Minnesota State is administered by the CTE unit. For more information, contact the state director for Career and Technical Education, Jeralyn Jargo, at jeralyn.jargo@minnstate.edu.

Secondary

MDE conducts civil rights compliance reviews in high schools that receive federal funds and provide CTE courses. The Civil Rights Compliance Review process includes document review and an on-site visit. The on-site visit, which is typically one full day, includes interviews of staff and students and a facilities review. The Civil Rights Reviews for MDE are administered by the Methods of Assurance Coordinator in the Division of Compliance and Assistance. Refer to the Division's website at <https://education.mn.gov/MDE/dse/civil/>.

Purpose of Reviews

The purpose of the Civil Rights Compliance Reviews at both high schools and colleges is to evaluate compliance with the following federal laws:

- Title VI of the Civil Rights Act of 1964 which prohibits discrimination on the basis of race, color, and national origin (34 C.F.R. Part 100)
- Title IX of the Education Amendments of 1972 which prohibits discrimination on the basis of sex (34 C.F.R. Part 106)
- Section 504 of the Rehabilitation Act of 1973 which prohibits discrimination by public entities on the basis of disability (34 C.F.R. Part 104)
- Title II of the Americans with Disabilities Act of 1990 which prohibits discrimination by public entities (including public schools, public colleges and universities, public vocational schools, and public libraries) whether or not they receive federal financial assistance on the basis of disability (28 C.F.R. Part 35)

RETENTION OF PERKINS V GRANT RECORDS

Minnesota Statute 138.17 subd. 7 provides that a government entity that holds data itself propose, and have approved, a record retention schedule in which it specifies how long it intends to keep records. The Minnesota State Records Retention Schedule (dated: April 9, 1997, Item 18) states that federal grants are to be kept seven (7) years or until audited.

Source: Minnesota State System Office, General Counsel.

POLICIES

Minnesota State System Office

Minnesota State Procurement

Contracts and procurements board policy

<http://www.minnstate.edu/board/policy/514.html>

Minnesota State Travel

Travel management:

<http://www.minnstate.edu/board/policy/519.html>

Conflict of Interest

<http://www.minnstate.edu/board/procedure/1c0p1.html>

(See Subpart A)

Minnesota State Gratuity

Gifts and grants:

<http://www.minnstate.edu/board/policy/707.html>

Minnesota State Inventory Controls

Purchasing cards:

<http://www.minnstate.edu/board/procedure/703p3.html>

Capital Assets:

<http://www.minnstate.edu/board/procedure/703p6.html>

Minnesota State Cash Management

General Finance Provisions

<https://www.minnstate.edu/board/policy/index.html#generalfinance>

Minnesota State Code of Conduct

<http://www.minnstate.edu/board/procedure/1c0p1.html>

Minnesota State Advisory Committees

<http://www.minnstate.edu/board/policy/330.html>

Minnesota State Grant Management

Grant Management: Internal control and compliance

<http://minnstate.edu/system/ia/reports/2017-m-state.pdf>

Minnesota Department of Education

MDE Cash Management

MDE processes program expenditures and then submits an invoice(s) for each separate federal year to Minnesota State, either monthly or more often if necessary, for reimbursement of the expenditures.

MDE uses program-specific project codes to facilitate the tracking of expenditures, obligations, and deposits of federal programs.

MDE Allowable Cost

The program manager determines whether costs are reasonable and necessary following the federal guidelines and the State of Minnesota travel, purchasing, human resources, payroll, and accounting guidelines.

Allowable expenditures are approved at the program level and submitted to the accounts payable/payroll unit for processing. Expenditures are supported by documentation and reports from the State of Minnesota data warehouse.

The Program Manager runs expenditure and encumbrance reports, reviews them for accuracy and requests corrections as needed.

The Federal Program Accountant updates the Federal Reconciliation for each grant award showing budgeted, expended, obligated, and unobligated balances. The Federal Reconciliations are saved to a shared drive for management and program use. The Federal Program Accountant meets with the Program Manager to review the Federal Reconciliation, expenditure, encumbrance, and payroll questions as needed.

The Director of Finance meets with the Program Manager and Program Director periodically to review the financial status of the state and federal funds.

State Match Requirements

The state match is the non-federal share of costs MDE contributes to accomplish the purposes of the grant.

The matching funds are not used as a match for any other federal program. The match comes from a non-federal source. The Perkins grant match largely consists of direct and indirect costs such as personnel salary, fringe, travel, indirect costs, and rent. MDE documents the value of the contributed resource and submits a total contributed amount to Minnesota State at the end of each calendar year.

CTE DIRECTORY

Minnesota State System Office Staff

To find the most up-to-date directory, visit:

<http://www.minnstate.edu/system/cte/directories/ourstaff.html>

Minnesota Department of Education

To find the most updated staff directory for MDE staff, visit:

<https://education.mn.gov/MDE/dse/cte/prog/>

Perkins Consortium Leaders

Perkins consortia leaders are responsible for the administration and implementation of the Perkins V Grant in each of the 26 consortia in Minnesota.

<https://www.minnstate.edu/system/cte/directories/perkinscoordinators.html>

APPENDIX A: MONITORING VISIT SAMPLE AGENDA

Day 1 MDE/Minnesota State monitoring team arrives at 10:00 a.m.

10:30 a.m. Opening Session

- Meet with consortium leadership to review schedule and purpose of the visit
- Consortium Presentation of Highlights

12:00 - 4:00 p.m. MDE/Minnesota State monitoring team members review evidence files prepared in advance by consortium leaders.

1:00 p.m. Consortium fiscal personnel available from consortium to review desk audit findings.

3:30 p.m. Monitoring team meets with secondary and postsecondary consortium leaders to ask questions and request additional information as needed.

4:00-5:30 p.m. Monitoring team continues to review evidence files and new information provided by consortium leaders.

Day 2 Monitoring team arrives at 8:00 a.m.

8:00 a.m. Monitoring team continues to review evidence files and new information provided by consortium leaders.

9:30 a.m. Monitoring team meets with secondary and postsecondary consortium leadership to discuss any last-minute requests for information and to discuss findings.

10:00 a.m. Monitoring team prepares final materials for 11:00 a.m. closing session

11:00 a.m. Closing Session: Monitoring team meets with consortium leadership to report findings, discuss strengths and answer questions.

12:00 p.m. **Adjourn**

APPENDIX B: CONSORTIA REPORTING TIMELINE

NEW!

JULY 1-JUNE 30 ANNUALLY

July 1-10

State staff review, approval, and correction of consortium plans and budgets

September-October

Critical webinars for consortium leaders led by System Office and MDE staff.

See the list of regularly scheduled webinars at <https://www.minnstate.edu/system/cte/professionaldevelopment/monthly-webinars.html>

October 1

Perkins Annual Performance Report (APR) is due online via the Minnesota State grant management system.

October-November

Perkins Consortium Leaders Annual Meeting and CTE Works! Summit

January

Notification of unexpended funds to be reallocated sent to each consortium. Perkins leaders submit reallocation of funds on the Minnesota State grant management system.

February

Reallocation of funds approval and notification: Upon approval of the revised budget, the State Director of Career and Technical Education at Minnesota State will send out an official award letter to Perkins leaders.

March-April

The Perkins Consortium Application opens on the Minnesota State grant management system for consortium leaders to begin the application process.

April

Minnesota Performance Targets Negotiated and state budget and revisions to State Plan due to OCTAE.

May 1

Deadline to submit Perkins Consortium Application on the Minnesota State grant management system.

June

Consortium Plan Reviews: Each consortium will give a joint presentation on their proposed Perkins plan to a panel of Minnesota State and MDE staff (60-minute face to face, online meeting, or ITV).

APPENDIX C: ASSET TAG EXAMPLE

Purchased with Perkins Federal Grant Dollars. By law, this must remain with a licensed CTE teacher. Do not recycle or remove from this classroom without notifying the SPPS CTE department.

This asset tag example was provided by the Saint Paul Perkins Consortium. Asset labels should identify the Perkins Federal Grant as the source of funding. Add other relevant details deemed necessary.

APPENDIX D: EXAMPLE OF A MINI GRANT FORM

Saint Paul Public Schools Perkins Grant Request Form

For Perkins Funds 2018-2019

Deadlines for submission: November 30, 2018 & March 31, 2019

Perkins Equipment/Curriculum Approval Form

Attach documentation of equipment ordering information as appropriate

Date:

Perkins Consortium:

Secondary Perkins Contact:

School District Number:

School Building Name:

Room (equipment location):

Licensed CTE Teacher:

MDE File Folder #

CTE Program:

Course Name:

Equipment Description/Special Expenditure Request

Total Equipment/Expenditure Cost:

Total Consortium Expenditure:

Briefly describe how this expenditure supports career and technical education within your CTE courses.

Please check "yes or no" for the following questions:

Yes No This purchase supports a rigorous program of study

Yes No This course receiving equipment offers postsecondary credit

Yes No This expenditure was funded previous years (if yes, explain funding source)

MDE Program Specialist / Date

MDE Program Specialist / Date

Any Technology or Equipment or any order over \$1,000.00 needs MDE and Principal approval. Principal Signature (needed for technology or equipment orders)

Please keep a copy for your records and send request form and all attachments, vendors and quotes via mail to:

Kathy Kittel

1780 W 7th Street

Phone: 744-1312; kathy.kittel@spps.org

Federal Perkins Rules and Procedures

Only licensed high school CTE teachers teaching in state approved CTE programs are eligible for Perkins grant funds. The basic guidelines for federal grants are all costs must be necessary, reasonable, allocable, and legal under state and local law. You must ask yourself, “Do I really need this? Are there existing resources, materials available? Is the expense targeted to valid programs?”

Equipment and materials purchased with Perkins funds cannot be used in non-CTE programs or in programs not intended in the request. If a program no longer exists, you must first notify the district Perkins administrator and then the materials and equipment purchased for that program will be reallocated to another CTE program within the school or district. This will need to be documented for audit purposes.

Perkins Grant Request forms:

- Complete the request form and attach all necessary information such as vendor and specifications.
- Identify both the Perkins Goal from the Saint Paul Consortium Local Perkins Plan found at http://www.minnstate.edu/system/cte/consortium_resources/local-applications.html
- Email the form and attachments to kathy.kittel@spps.org the District Perkins Administrator.
- All orders for Technology or Equipment need the principal signature on them to ensure that there are school funds available for installation if needed.
- All requests are approved at the discretion of the Perkins administrator and MDE.
- Any submissions after March 31, 2019 may not be considered.

For SPPS CTE office use only

Approved _____ Date _____

Goal _____

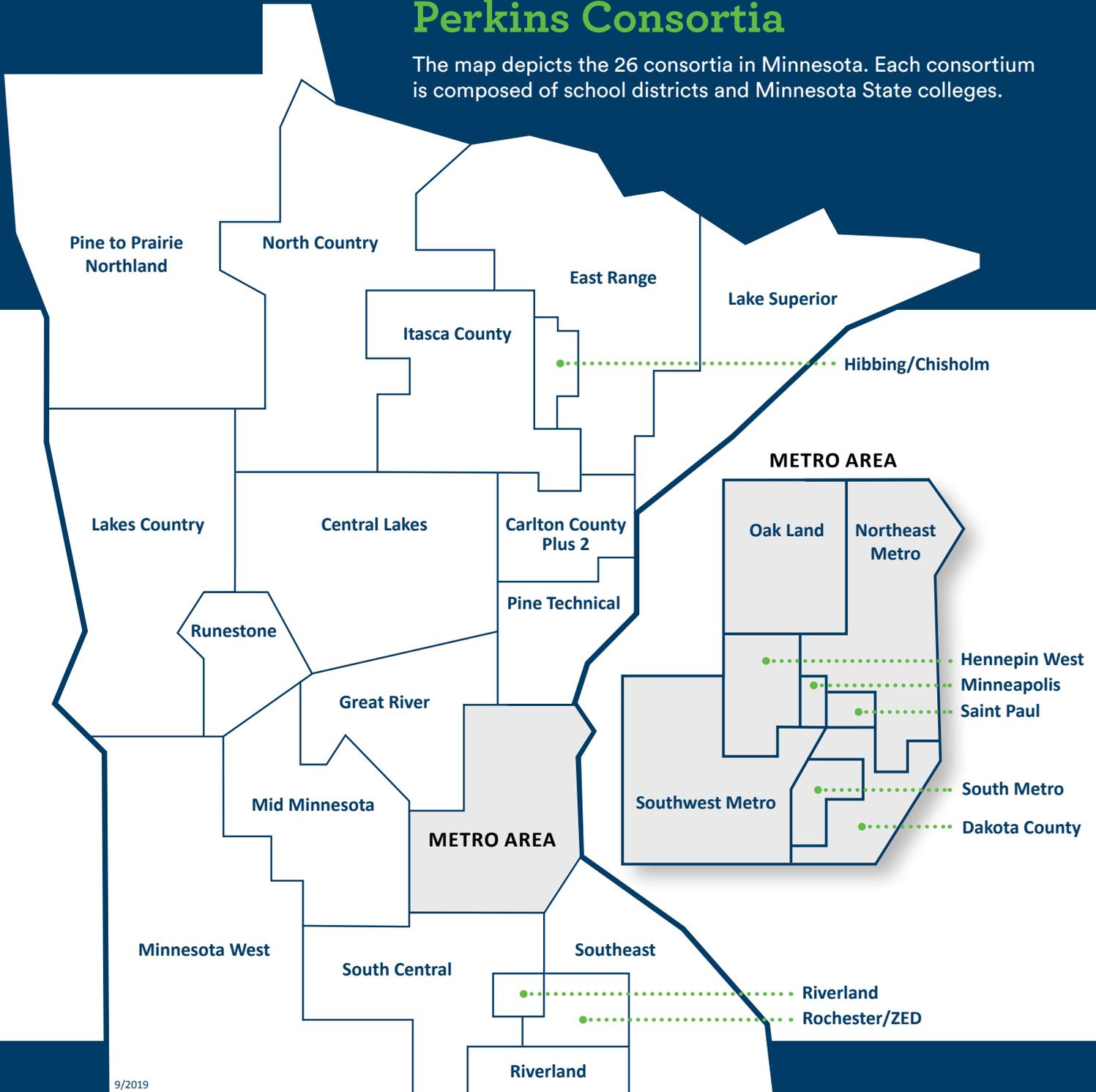
School _____

Not Approved _____ Date _____

Reason _____

Perkins Consortia

The map depicts the 26 consortia in Minnesota. Each consortium is composed of school districts and Minnesota State colleges.



Connect With Us!

www.MinnState.edu/System/CTE/directories



MINNESOTA STATE
Career and Technical Education



DEPARTMENT OF EDUCATION

Minnesota State and Minnesota Department of Education are affirmative action, equal opportunity employers and educators.