

Texas Higher Education Coordinating Board

Perkins Basic Orientation  
June 10, 2021

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“Our Texas institutions are making significant commitments to create programs that keep more students on track to enter the workforce with the high-value credentials and education that tomorrow’s economy will demand.”

– Commissioner of Higher Education Harrison Keller

# A Few Reminders for the Day

- ❖ The chat feature will be disabled during the webinar. Ask questions using the Q&A feature.
- ❖ Q&A will be monitored by THECB staff. Questions posted to Q&A will be answered during scheduled Q&A sessions throughout the day.
- ❖ Mics will be muted for the duration of the webinar for attendees.
- ❖ There will be a 30-minute break at 11:45. Please feel free to take a break as needed throughout the day.
- ❖ The webinar is being recorded and will be available, along with the presentation, on the THECB Perkins page in the coming days.

Texas Higher Education Coordinating Board

# Workforce Education

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*Tina Jackson, Ph.D., Assistant Commissioner Workforce Education*

## Workforce Education Vision Statement

The Workforce Education Division is dedicated to supporting high value industry-endorsed credential pathways that are responsive to changing labor market needs, while strategically aligning cross sectional talent pipelines between THECB, the Texas Workforce Commission and The Texas Education Agency.

# Workforce Education (WE) Division

## Private Postsecondary Institutions

- Accredited Degree Granting Institutions
- Certificate of Authorization
- Annual Compliance Review
- Surety Regulation Monitoring
- Non-Accredited Degree Institutions
- Certificate of Authority
- Registered Agents
- Closed School Transcript Repository
- Fraudulent/Substandard Institutions

## Career & Technical Education

- Career & Technical Education Programs
- Carl D. Perkins, CTE Fund
- GEER Texas Reskilling Support Fund
- SB 64 Cybersecurity Pathways Workgroup
- Career & Technical College Leadership Council

# Workforce Education Transfer Pathways Work

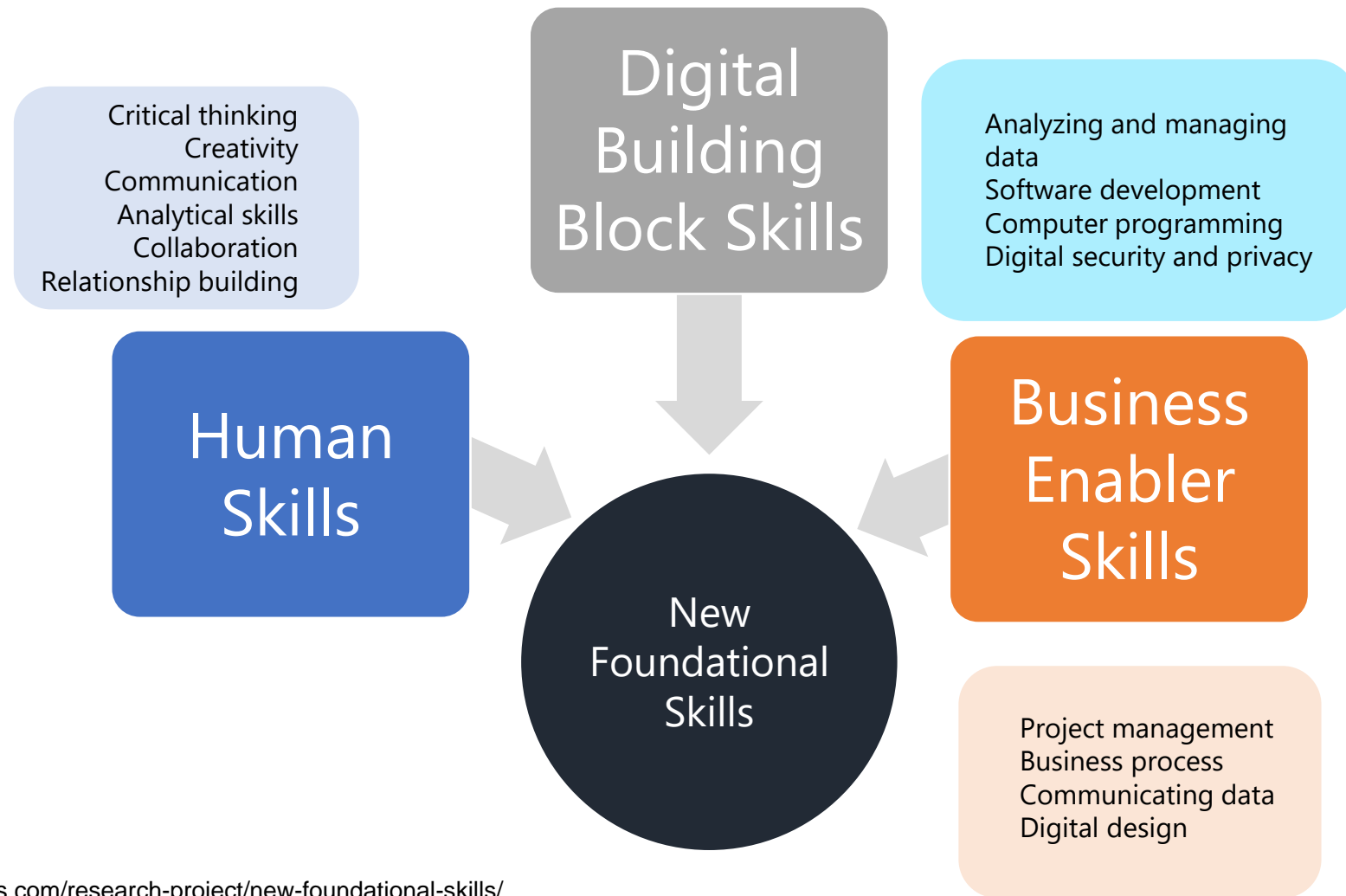
- Tri-Agency Workforce Initiative
- 2+2 Programs
- Articulations Agreements/  
Regional MOU's
- SB 64 Cybersecurity Pathways  
Workgroup
- WECM Advisory Committee
- Linked WECM Courses to ACGM  
Coursework

# National Trends to Highlight

- Forming shorter programs
- Embracing credentials
- Supporting competency-based education
- Developing appropriate online education
- Improving completion rates
- Embedding industry-recognized credentials into educational programs
- A general consensus that youth and adults are moving beyond a “college for all” mentality
- Continuation of Labor Market Information trends with some acceleration



# Skills Needed for the Future of Work



# Reskilling Grants Current Status

**Program Goal:** Support 30,000 students in their efforts to reskill or upskill through high value postsecondary credentials and orient and build field capacity to support reskilling and upskilling. \$46.5 million obligated by June 22.

## Summary Table

	Round 1	Round 2	Consolidated (unduplicated)
# of Awards	40	25	65
# of Institutions	49	31	62
# of Students	11,975	6,100	18,075
Award Amounts	\$18,111,447	\$9,300,000	\$27,411,447
# of Consortia	3	3	5

\$7.95 million provided to public 4-year institutions  
\$14.1 million provided to public 2-year institutions  
\$5.3 million provided to consortiums that include both 2 and 4-year institutions

# Workforce Education (WE) Action Items

- Engage business in targeted cross-sector partnership.
- Expand to maximize value through upskilling and reskilling opportunities.
- Lay the foundation for statewide talent pipelines that improve completion and employment outcomes.
- Support Fast-Tracks to High Value Stackable Micro-Credentials.
- Align Pathways with Texas Workforce Needs.
- Strategic Planning for the Post-Pandemic Era.

Texas Higher Education Coordinating Board

# Perkins V & OCR Civil Rights Oversight

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*Mindy Nobles, Workforce Education*

# Presentation Overview

Review of Perkins V Equity Requirements and Accountability

Braiding Perkins V and OCR Civil Rights Oversight

Implementation Plan FY 2022

# Perkins V Equity Requirements Review: Purpose of Act

## Sec. 2: Purpose

The purpose of this Act is to develop more fully the academic knowledge and technical and employability skills of secondary students and postsecondary education students who elect to enroll in career and technical education programs of study by–

...

(8) Increasing the employment opportunities for populations who are chronically unemployed, including individuals with disabilities, from economically disadvantaged families, long-term out of workforce, past or current foster care, and homeless.

# Perkins V Equity Requirements Review: CLNA

## Sec. 134(c)(2) Comprehensive Local Needs Assessment

(E) A description of progress toward implementation of equal access to high-quality career and technical education courses and programs of study for all students, including—

- (i) strategies to overcome barriers that result in lower rates of access to, or performance gaps in, the courses and programs for special populations;
- (ii) providing programs that are designed to enable special populations to meet the local levels of performance; and
- (iii) providing activities to prepare special populations for high-skill, high-wage, or in-demand industry sectors or occupations in competitive, integrated settings that will lead to self-sufficiency.

# Perkins V Equity Requirements Review: Local Application

## Sec. 134(b) Local Application Narrative

(9)... a description of how the eligible recipient will address disparities or gaps in performance as described in section 113(b)(3)(C)(ii)(II) in each of the plan years, and if no meaningful progress has been achieved prior to the third program year, a description of the additional actions such recipient will take to eliminate those disparities or gaps.



# Perkins V Equity Requirements Review: State Report

## Sec. 113 Accountability

### (b)(3)(C) State Report

(ii) Data—...[THECB] shall—

(I) Disaggregate data for each of the indicators of performance—

(aa) for ... special populations...that are served under this Act; and

(bb) By the career and technical education programs or programs of study...;

(II) Identify and quantify any disparities or gaps in performance on the [core indicators] between any ... special population and performance of all CTE concentrators served by [THECB].

# Braiding OCR and Perkins Civil Rights Oversight

## OCR Civil Rights Oversight

- Compliance with federal statutes barring discrimination on basis of:
  - Race
  - Color
  - National origin,
  - Sex,
  - Disability

## Perkins Civil Rights Oversight

- **Local Accountability** for providing:
  - Equitable access and opportunity for special populations students

# Braiding OCR & Perkins V Civil Rights Oversight: OCR Background

## **Basis for OCR Oversight**

*Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs:*

“The State agency responsible for the administration of vocational education programs must adopt a compliance program to prevent, identify and remedy discrimination on the basis of race, color, national origin, sex or handicap by its subrecipients.”

(34 C.F.R Part 100, Appendix B (II)(B))

# Braiding OCR & Perkins V Civil Rights Oversight: Civil Rights Statutes

## **Federal Statutes (*Regulations*)**

- Discrimination on Basis of Race, Color, and National Origin. Title VI of the Civil Rights Act of 1964 (34 C.F.R. Part 100 (Title VI));
- Discrimination on Basis of Sex. Title IX of the Educational Amendments of 1972 (34 C.F.R. Part 106 (Title IX));
- Discrimination on Basis of Disability:
  - Section 504 of the Rehabilitation Act of 1973, (34 C.F.R. Part 104 (Section 504));  
and
  - Title II of the Americans with Disabilities Act of 1990, (28 C.F.R. Part 35 (Title II)).

# Braiding OCR & Perkins V Civil Rights Oversight: Perkins V Background

## Basis for Perkins V Oversight

- Perkins V statutory language (cited above)
- Joint Memorandum, OCR and OCTAE, February 2020
  - Strong encouragement to "harmonize" OCR Guidelines oversight with Perkins V equity and civil rights oversight
    - Significant Perkins updates since 1979 *Guidelines* issued
    - Perkins a major source of federal funding for CTE programs
- New Texas Methods of Administration (MOA) oversight plan approved, September 2020

# Braiding OCR & Perkins V Civil Rights Oversight: The New MOA Plan – Risk Assessment (OCR)

- THECB will continue to examine these data:
  1. Minority participation in CTE programs;
  2. Female participation in CTE programs;
  3. Participation of individuals with disabilities in CTE programs;
  4. The number of students enrolled in CTE programs at the institution;
  5. Non-traditional student participation in CTE programs; and
  6. Length of time since the most recent on-site MOA review.

# Braiding OCR & Perkins V Civil Rights Oversight: The New MOA Plan – Risk Assessment (Perkins)

- THECB will add these data:
  1. Analysis of disaggregated Perkins special populations data to identify colleges with the most significant performance gaps for the nine Perkins V special populations compared to CTE concentrators statewide.
  2. Analysis of colleges' CLNA implementation, as evidenced by Perkins core indicator performance trends.
- **Purpose:** identify colleges with significant gaps in CTE student performance, including special populations access to CTE.

# Braiding OCR & Perkins V Civil Rights Oversight: The New MOA Plan – The Review Process

**Purpose:** to tailor the level of review to the identified level of risk, akin to Perkins programmatic reviews.

**Process:**

1. With annual Perkins Basic application, Colleges will certify compliance with Section 504 of the Rehabilitation Act (1973) and Title II of the Americans with Disabilities Act (1991). A college failing to submit certification will automatically flagged for an onsite disabilities equity review.
2. Disaggregated Perkins data and traditional MOA data will be analyzed in tandem with Perkins Consolidated Annual Report data development.
3. Colleges identified for an MOA compliance review will be notified.



# Braiding OCR & Perkins V Civil Rights Oversight: The New MOA Plan – The Process, cont.'d

5. Identified colleges will be subject to a civil rights compliance desk review.
6. Identified colleges whose students with disabilities fall below a minimum performance threshold will be subject to an MOA compliance site visit to gather additional information about facilities accessibility and other potential impediments to success.
7. Colleges subject to a disabilities review site visit may also be subject to facilities audit (next slide).
8. Colleges will be notified of findings following review.
9. Colleges will submit corrective action plans.
10. THECB will approve and monitor progress on corrective action plans.

# Braiding OCR & Perkins V Civil Rights Oversight: The New MOA Plan – Facilities Audits

Should an onsite disabilities equity review show significant deficiencies, a college may be instructed to undertake a self-assessment of physical access, with third-party certification of accessibility and areas of noncompliance to be submitted to THECB.

- Colleges may use Perkins funds to cover the cost of third-party audit and report.
- Colleges will be allowed sufficient time to meet the facilities audit requirement.
- Colleges will be allowed sufficient time to correct facilities audit findings.

# Braiding OCR & Perkins V Civil Rights Oversight: The New MOA Plan – General Timeline

<b>July</b>	<ul style="list-style-type: none"><li>• Colleges submit 504/Title II Certification with Perkins Application</li></ul>
<b>December</b>	<ul style="list-style-type: none"><li>• Data from Consolidated Annual Report used for OCR/Perkins Civil Rights risk assessment</li></ul>
<b>January</b>	<ul style="list-style-type: none"><li>• Colleges notified</li></ul>
<b>Spring-Summer</b>	<ul style="list-style-type: none"><li>• Desk reviews, site visits</li><li>• THECB notifications of findings</li><li>• Institutions' submission of corrective action plans</li><li>• THECB approval of corrective action plans</li></ul>
<b>Upon Approval</b>	<ul style="list-style-type: none"><li>• Institutional corrections implemented, with documentation submitted to THECB</li></ul>

Questions?

Texas Higher Education Coordinating Board

# CLNA Update

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*Stephanie Perkins, Workforce Education*

*Sheri Ranis, Workforce Education*

June 10, 2021

# Comprehensive Local Needs Assessment

- Producing a CLNA is a mandatory requirement of Perkins V for every institution receiving support from the Perkins Basic allocation.
- An institution's CLNA is a **living document**.
  - A CLNA is an ongoing assessment of the goals/targets/objectives of an institution's Career and Technical Education pursuits.

# Challenges due to COVID-19

The pandemic presented barriers to producing and implementing the CLNA. It also provides an opportunity to **redo or reset** CLNA objectives and activities.

# Risk Assessment

## **CLNA is an element of Perkins Basic Risk and OCR Assessments**

Each year Perkins staff look at CLNAs as one factor in a set of indicators that determine which Perkins Basic grantees will be undergoing desk reviews and site visits. Additionally, the CLNA will be considered when conducting OCR risk assessments.



# CLNA Timeline

SEC. 134. [20 U.S.C. 2354] LOCAL APPLICATION FOR CAREER AND TECHNICAL EDUCATION PROGRAMS.

(c) COMPREHENSIVE NEEDS ASSESSMENT.– (1) IN GENERAL.–To be eligible to receive financial assistance under this part, an eligible recipient shall–

(A) conduct a comprehensive local needs assessment related to career and technical education and include the results of the needs assessment in the local application submitted under subsection (a); and (B) not less than once every 2 years, update such comprehensive local needs assessment.

# CLNA Timeline *continued*

## FY 2020

- Colleges were in a transition year; a CLNA was not required with the Perkins Basic grant application submission.
- Four model CLNA's were developed to assist colleges in better understanding the process of conducting and writing the CLNA.

# CLNA Timeline *continued*

## FY 2020/2021

- Colleges were required to consult stakeholders and formulate the CLNA which was submitted with the FY21 Perkins basic application.
- Activities and funding priorities identified in the CLNA were incorporated into the Basic application.

# CLNA Timeline *continued*

## FY 2022

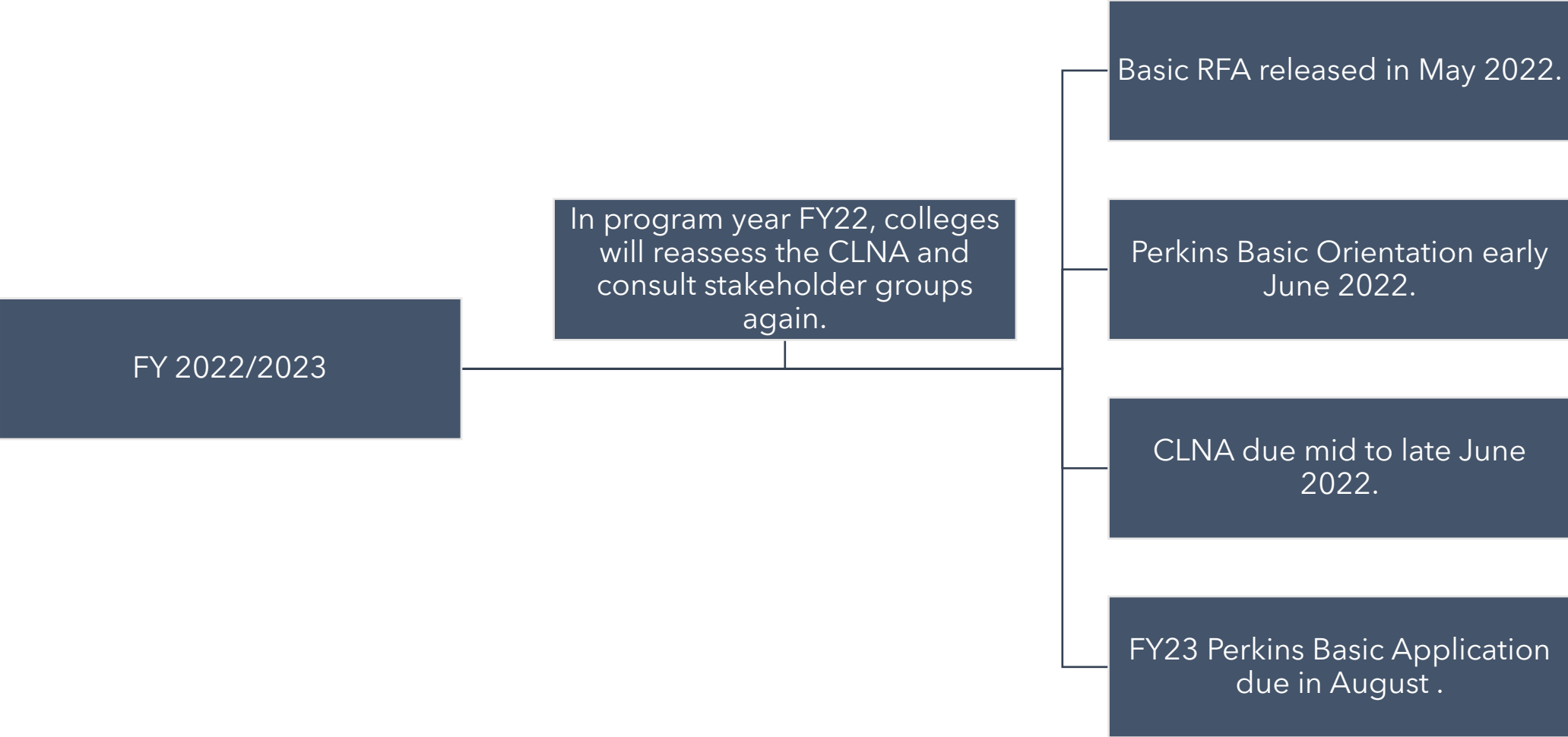
- Any college can revise the CLNA and resubmit to THECB before the 2-year mandatory revision is required. This is a living document that should be continuously reviewed by the college's CLNA task force. **Any revised CLNA's must be submitted to [perkins@highered.texas.gov](mailto:perkins@highered.texas.gov) by July 1, 2021. This will allow THECB staff plenty of time to review the document ahead of Perkins Basic Application reviews.**
- Colleges will be required to tie together activities/targets and budget items to the current or revised CLNA in the Basic application submitted for FY22.

# CLNA Timeline *continued*

## FY 2023

- Colleges submit a revised CLNA to THECB on a timeline similar to the first submission in FY20/FY21. The CLNA will be due before the Perkins Basic Application.
- Colleges will be required to tie together activities/targets and budget items to the revised CLNA in the Basic application submitted for FY23.

# CLNA Timeline *continued*



# Mandatory Stakeholder Consultations

## Statutory Reference:

Strengthening Career and Technical Education for the 21<sup>st</sup> Century Act (Perkins V), Section 134

**Stakeholder consultations must be incorporated into the CLNA.**

**Consultations must be done on an ongoing basis to ensure:**

- responsiveness to community employment needs;
- alignment with employment priorities;
- incorporation of labor market information;
- activities that reflect current, intermediate and long-term market projections and
- employer input on programs of study standards, curriculum, industry-recognized credentials and current technology & equipment.

# Mandatory Stakeholder Consultations *continued*

## Required Stakeholder groups include:

- CTE teachers ,counselors, school leaders, administrators
- Postsecondary faculty and administrators
- State and local workforce development boards and local/regional businesses/industries
- Parents and students
- Representatives of Perkins Special Populations
- Regional/local agencies serving out-of-school youth, homeless youth and at-risk youth
- Indian tribes and tribal organizations

**Consultations can be virtual or in person.**

### **Statutory Reference:**

Strengthening Career and Technical Education for the 21<sup>st</sup> Century Act (Perkins V), Section 134



# Exemplary CLNA Work

## Summary Section of CLNA

- Colleges with CTE specific visions/mission statements aligned or nested in the college's overall mission and/or strategic plan were powerful.
- Colleges that were very specific with priorities that addressed findings in the CLNA process did an exemplary job.

# Exemplary CLNA Work *continued*

## Narrative Components of CLNA

- Formatting that made it easy to find goals and approaches to remove gaps was preferable.
- Using data to inform goals backed up by tables and data depictions in the appendices gave validity to the CLNA.

# Exemplary CLNA Work *continued*

## Appendices of CLNA

- Appendices were not part of the CLNA narrative suggested page limit, so colleges could share any relevant data and examples that backed up findings, gaps, and goals that were identified.
- Exemplary CLNA's provided detailed information in this section that directly related to the narrative.

## Statutory Requirements of CLNA

- Exemplary CLNAs paid close attention to the statutory requirements and made that evident in the CLNA narrative by addressing the issue and describing how execution against the requirement.

# Pitfalls to Watch Out For

- Some CLNAs did not address access & equity for special population students and needed to be revised.
- Some colleges identified that there was no data collected to verify who is a special populations student. This was allowed in the CLNA for FY21, but colleges should be finding ways to collect this data, so that results/findings can be reported in the FY23 revised CLNA.
- Due to COVID-19, some colleges experienced difficulties engaging stakeholders.

# Resources for CLNA Updates and Revisions

## **THECB Website:**

<https://www.highered.texas.gov/institutional-resources-programs/public-community-technical-state-colleges/career-technical-education-workforce-initiatives/carl-d-perkins-career-and-technical-education1/perkins-v-comprehensive-local-needs-assessment/>

## **Resources include:**

Model CLNAs  
Instructions and Templates  
Webinar recordings on CLNA Construction  
FAQ

# CLNA and the Perkins Basic Application

## **Statutory Reference:**

Strengthening Career  
and Technical Education  
for the 21<sup>st</sup> Century Act  
(Perkins V), Section 134

**CLNA priorities should always be reflected in proposed programs, activities and budgets described in the Basic Application.**

**CLNA priorities should be incorporated both in the thinking behind the proposal and the actual proposal form narrative and budget forms submitted.**

- Make explicit references to the CLNA in all application documents.
- Budget should be aligned with CLNA priorities.
- Include CLNA citations/references in budget items.

**Time for Q&A**  
**15 minutes**



**Break**  
30 minutes

Texas Higher Education Coordinating Board

# Unpacking the 2021-22 Basic Grant RFA

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*Mindy Nobles, Workforce Education*

*Sheri Ranis, Workforce Education*

June 10, 2021

# What Impacts the Perkins Basic 2021-22 RFA?

- Modifications and clarifications from the U.S. Department of Education concerning Perkins V
- Modifications and clarifications from Federal Uniform Grant Guidance (UGG)
- THECB Perkins staff annually reviews and refreshes the RFA utilizing input from Perkins grantee institutions

**The Basic RFA incorporates all these changes.**

# What's New in the 2021-22 Basic RFA

## ***Major Updates***

- Special Populations Accountability
- Facility Accessibility Certification

## ***New Emphasis: Existing Requirements***

- Document signatures
- CLNA revision in FY 2022
- Target measures
- Grant activity titles
- Time & Effort documentation

## ***New Requirements***

- Made in the USA requirement
- Cost breakout thresholds
- Expenditure report due dates

# Special Populations Accountability: RFA

## **Sec. 6: Program Purpose**

Local program success measured by:

- Ability to meet Perkins core indicators
- Progress in reducing special populations performance gaps

## **Sec. 7.4: Performance Improvement/Evaluation Plans**

Must show how programs, activities, and key budget items support:

- Core indicator improvement
- Closing special populations performance gaps

Must evaluate success in meeting objectives

# Special Populations Accountability: Rationale

## **Basis for Special Populations Accountability Update**

- Supports Perkins V's emphasis on special populations success
- Supports new MOA oversight plan
  - Success of CLNA implementation (core indicator performance as proxy)
  - Disaggregated special populations performance data

# Facilities Accessibility Certification: RFA

## **Sec. 4: Application Process**

Must submit signed certification form with Cover Page

## **Sec. 7: Application Content**

Certification form part of application

## **Sec. 7.8: Certification of Section 504 and ADA Title II Compliance**

Sets forth requirement to submit certification

## **Sec. 13: Certification of Section 504 and ADA Title II Compliance**

Statutory overview and background

## **Appendix E: Certification Form**

Form for signature

# Facilities Accessibility Certification: Rationale

## **Basis for Certification Requirement**

- Component of new MOA oversight program
- A comprehensive approach
- Emphasis on institutional responsibility
- Students with disabilities:
  - A special populations group
  - Protected under Sec. 504/Rehabilitation Act & Title II/Americans with Disabilities Act



# Signatures and CLNA Revision

## **Sec. 4: Application Process**

- Cover page and certification documents may be signed in hard copy or electronically.

## **Sec. 7.2 & Appendix F: Comprehensive Local Needs Assessment**

- Updates are optional for FY 2022.
  - No change to FY21 CLNA guidelines or supportive materials.
  - If undertaken, updates due on or before July 1 to [Perkins@highered.Texas.gov](mailto:Perkins@highered.Texas.gov)
- Updates are required for FY 2023.
  - Data study and stakeholder consultations required
  - Study and consultations to be undertaken in FY 2022
  - Materials updates and THECB training pending

# Target Measures, Grant Activity Titles, & Time and Effort

## **Sec. 7.4.2: Evaluation Plan**

- Set Target Measures that can be evaluated before final report is submitted.

## **Sec. 7.5.1: Grant Activity Titles**

- Instructional Equipment: Use only in Schedule C Capital Equipment.
- Other: Use only when no other titles align closely with budgeted Activity.
- Special Populations: Use on Schedule A (Sec. 7.5.2.1) only if position has work with special populations students as the position's primary job focus.

## **Appendix A: Grant Cost Guidelines**

- Salaries, Wages, and Employment Benefits: Time certification in lieu of time and effort reporting is not allowable.

# Made in USA, Cost Breakout Thresholds, & Expenditure Reports

## **Sec. 7.5.5.1: Requesting Cost Items under Schedule D**

- New: Preference must be given whenever possible to goods, products, and materials made in the USA (2 CFR §200.322).
- New: Requirement must be included in all contracts on Schedule D.

## **Sec. 7.5.7: Schedule F Operating Expenses Services, and Books**

- New: Cost breakout threshold for Student Support Services raised to \$15,000.
- New: Cost breakout threshold for Supplies and Marketing Materials raised to \$4,000.

## **Appendix J: Reporting Requirements**

- First quarterly expenditure report due date has been moved to January 7 in acknowledgement of colleges' extended holiday breaks.

Questions?

Texas Higher Education Coordinating Board

# Perkins Basic Budget Basics

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Stephanie Perkins, Workforce Education  
Duane Hiller, Workforce Education  
June 10, 2021

# Budgeting the Perkins Basic Local Application

## RFA Section 7.5 Budget

The Applicant shall prepare a 2021-2022 budget that:

- identifies prioritized FY 2022 CLNA goals as relevant;
- includes, but is not limited to, the cost items identified in the Performance Improvement/Evaluation Plans;
- is consistent with the goals and objectives of Perkins V;
- meets applicable rules and laws, including the allowable cost principles in the applicable Uniform Grant Guidance (e.g., 2 CFR 200 Subpart E–COST PRINCIPLES);
- complies with the Requirements for Uses of Funds (Appendix K), Perkins Grant Cost Guidelines (Appendix L), and Supplementing Versus Supplanting (Appendix M); and
- can be expended within the Federal Funding Period (September 1, 2021 to August 31, 2022).

# Your Budget and CLNA Findings

- **Colleges must budget for CLNA student performance and special population goals to remedy gaps identified in the CLNA and may also prioritize other FY22 goals based on local need (colleges do not need to budget for every FY22 goal in the CLNA).**
- **Not all budgeted expenditures need to be targeted on a specific CLNA goal. For example, standard components of every Perkins program, such as keeping CTE programs current, may appear without specific reference to a CLNA goal.**

# Special Populations Expenditures

- **Budget items may be spent on mitigating and/or removing barriers to participation for CTE students who identify as one or more of the special populations categories defined by Perkins V.**
- **All expenditures must be instruction-related (i.e. supplies, costs for access, and direct costs of participating in classes):**
  - ✓ **Textbooks, uniforms, tools (including open educational resources), etc.**
  - ✓ **Technology, software licenses, testing vouchers, etc.**
  - ✓ **Transportation, childcare, etc.**



# Budget Schedules

- **Schedule A: Salaries and Fringe Benefits- RFA 7.5.2**
  - ✓ **All Perkins funded employees listed here.**
  - ✓ **Included time spent on grant and description of duties.**
- **Schedule B: Travel- RFA 7.5.3**
  - ✓ **All in and out-of-state travel. Registration fees go on schedule F. Virtual conferences go on F as well.**
- **Schedule C: Capital Outlay/Equipment- RFA 7.5.4**
  - ✓ **All capital items (one unit or multiple parts that comprise one unit) over \$5,000. If your college has a more stringent capitalization policy, you must notify THECB.**

# Budget Schedules Continued

- **Schedule D: Consultants and Service Contracts- RFA 7.5.5**
- **Schedule F: Operating Expenses, Services, and Books- RFA 7.5.6**
  - ✓ **Largest budget schedule. Next slide will explain more about unit cost breakout.**
- **Schedule G: Administration/Indirect Cost- RFA 7.5.8**

# Formatting Budget Lines

- **Bundling conference registration, line-item savings/overages, supplies, or marketing/outreach into one line is permitted.**
- **Marketing and supplies (consumables) budgeted over **\$4,000** (new threshold in FY22) must have a unit cost breakout (xx@\$xx). This can be found in 7.5.7 of RFA.**
- **Student support costs budgeted over **\$15,000** (new threshold in FY22) must have a unit cost breakout (xx@\$xx). This can be found in 7.5.7 of RFA.**

# Grant Activity Titles

- **7.5.1 Grant Activity Titles- The Applicant shall identify one of seven grant activity titles with each cost item included in Schedules A-F.**
- **The “Other” grant activity title is intended for costs not fitting neatly into other categories.**
- **The use of the “Special Population” grant activity title shall only be used when the person, activity, equipment, etc. will *only be utilized* by special population students.**
- **The “Instructional Equipment” grant activity title should only be used on schedule C.**

# Miscellaneous Budget Items

- **Schedule C cannot exceed its budgeted amount on expenditure reports. A formal amendment must be done in the portal to increase and decrease this Schedule.**
- **Schedules A-F, excluding C, can be changed through an email notification to the college's THECB Perkins designated grant advisor if the changes do not cumulatively exceed the allocated total amount of the grant by 10%.**

# RFA Section 7.5.8- Schedule G: Administration/Indirect Cost

Language was added in FY22 RFA that will be amended in the coming months. Colleges can change this budget, or any budget, through email notification or formal amendment.

Colleges shall not report an amount on expenditure reports if any budget has a \$0 budgeted amount. THECB has particularly seen this on schedule G in the past.

# RFA Section 10.4- PROGRAM INCOME

An Awarded Applicant may generate program income in the operation of projects directly supported by federal funds administered by the THECB. In no case, however, may such income be generated from fees or charges to any person or institution that is intended to be a third-party beneficiary of such projects.

- Examples:
  - Cosmetology students cannot be charged for cosmetology services.
  - Massage therapy students cannot be charged for massage therapy services.

# RFA Section 10.4- PROGRAM INCOME *continued*

Awarded Applicant shall establish budget and accounting controls for such program income that is separate from the project proper. This accounting shall demonstrate that the program income is being used to further the objectives of the related project.

- Local accounting controls should be in place that show the flow of income i.e., into the CTE program and back into a CTE program in the form of a CTE allowable cost (student supports, supplies, program costs, equipment, etc.).
- Program income may not be placed into a college's general revenue.
- Section 10.4 will be amended to remove the requirement of reporting program income in the biannual and final report.



# RFA Appendix L

## Time & Effort

### Time & Effort Highlights

- As mentioned earlier, certifications for 100% FTE staff are no longer allowed.
- Time and effort reports must document staff's specific time on task in detail even if staff is 100% FTE Perkins-funded. Grant employees must show that **time on task** is CTE-related for allowability. Additionally, grant employees' recorded effort must align with Schedule A listed and approved job duties. *Certification statements in lieu of Time and effort reports are not allowable.*

# RFA Appendix L

## Travel

### Travel Costs Highlights

- Employees may be reimbursed at the per diem rates or for actual costs not to exceed the per diem rates.
- At the institutional discretion, employees who exceed the per diem rates may be reimbursed for the difference with other non-federal funds that are available to the Awarded Applicant.
- Site-specific information on rates for in-state and out-of-state travel is available at the U.S. General Services Administration. **All federal travel must be at the GSA rate.**
- The most common found **unallowable** travel cost found on desk reviews are **tips**. Receipts are not required to be collected but are **encouraged** for verification purposes.

# RFA Appendix K

## Requirements for Uses of Funds

### CTE Student Organizations

- Support for CTE student organizations is a new student support cost in Perkins V legislation.
- Support is for career and technical student organizations, including student preparation for and participation in technical skills competitions aligned with career and technical education program standards and curricula.
- Colleges can support student clubs such as: Skills USA, CJ, CIT, Welding, etc.

# RFA Appendix M

## Supplanting

### Supplementing vs. Supplanting Highlights

- Funding provided under the Perkins Act shall supplement (increase the level of services) and not supplant (take the place of) state, local, and other federal funds. Awarded Applicants shall not use Perkins funds to supplant funds that, in the absence of Perkins funds, would have been spent on CTE students.
- Federal funds cannot be used to pay for services, staff, programs, or materials that would otherwise be paid with state or local funds.

**Time for Q&A**  
**15 minutes**

Texas Higher Education Coordinating Board

# Further Guidance & Tips

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Stephanie Perkins, Workforce Education  
June 10, 2021

# How to Avoid Re-Openings

- ✓ Signing Appropriate Documents
- ✓ Incorporating the CLNA in the Local Application, PI/EP, and Budget Sheets
- ✓ Performance Improvement/Evaluation Plan
- ✓ Amendments & Budgets

# Signing Appropriate Documents

- All documents must be signed by appropriate parties to avoid delays in NOGA issuance.
- All documents are due by 5:00 pm July 23, 2021 at [Perkins@highered.texas.gov](mailto:Perkins@highered.texas.gov).
  - Cover page (Appendix B)
  - Certification Regarding Lobbying (Appendix C)
  - FFATA Certification (Appendix D)
  - Certification of Compliance with Sec. 504 and ADA Title II (Appendix E)



# Incorporating the CLNA in the Local Application, PI/EP, and Budget Sheets

- As a reminder, the CLNA must be cited throughout the Perkins Basic Application.
- References should be included in the Local Application as you develop the narrative.
- As you formulate activities, goals, and targets for FY22, CLNA gaps and priorities should be incorporated into the PI/EP where applicable.
- Where applicable, CLNA references should be referenced in budget lines that match with gaps identified in the CLNA and places referenced in the PI/EP.

# Performance Improvement/ Evaluation Plan

**\*\*Activities and strategies that extend the full length of the Grant Period should be divided into sub-activities and sub-strategies that will show the Awarded Applicant's incremental progress in completing the larger activities and strategies.\*\***

- Section 7.4.1 of RFA- The Applicant shall develop a Performance Improvement Plan that identifies the Perkins-funded CTE programs, activities, and specific budget items that will play a significant role in improving its performance on each core indicator and address prioritized FY 2022 CLNA goals. The Plan shall, at a minimum, address goals identified in the CLNA's Student Performance and Access and Equity sections.
- Section 7.4.2 of RFA- The Applicant shall develop an Evaluation Plan that measures the effectiveness of the Perkins-funded programs, activities, and budget items in the Performance Improvement Plan. The Evaluation Plan shall include (a) activities and strategies; (b) a planned timeline; and (c) target measures that can be evaluated prior to the end of the grant period.

# Amendments & Budgets

- Amendments are required for any changes to schedule C or if a change exceeds 10% of the total allocation of the grant.
- Check the CB100 and CB320 before submitting an amendment. Ensure that totals are correct and there are no negative balances on the CB320.
- Budget description for equipment must include the program the equipment is for.
- Use of the correct activity for budget lines must be utilized.
  - ✓ Special population activity is for items that are to only be used by special pop. students.
  - ✓ Instructional equipment is only used in schedule C.
  - ✓ Other is only used if no other activity fits the line description.

# Final Q&A

15 minutes

# Thank you for attending!

## THECB Perkins Staff, Workforce Education

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