Louisiana Community & Technical College System

Changing Lives, Creating Futures

Perkins V Manual

2020 – 2021 Edition

Table of Contents

ACRONYMS

ADA: Americans with Disabilities Act of 1990

CAR: Consolidated Annual Report

CFO: Chief Financial Officer

CFR: Code of Federal Regulations

CLNA: Comprehensive Local Needs Assessment

CPO: Chief Procurement Officer

CTE: Career and Technical Education

CTSO: Career and Technical Student Organization

DOA: Division of Administration (Louisiana)

EDGAR: Education Dept. General Administrative Regulations

EFT: Electronic Funds Transfer

eGrants: Electronic Grants System

ESSA: Every Student Succeeds Act

F&A: Facilities & Administrative costs

FSR: Financial Status Report

IBC: Industry Based Certification

IET: Integrated Education & Training

LAP: Local Application Plan

LCTCS: La. Community & Technical College System

LDE: La. Department of Education (Secondary)

LPAA: La. Property Assistance Agency

LWC: La. Workforce Commission

MEPOL: Manufacturing Extension Partnership of La.

MOS: Microsoft Office Specialist

MOA: Methods of Administration

MOE: Maintenance of Effort

MOU: Memorandum of Understanding

OCR: Office for Civil Rights (Federal) **or** Office for Contractual Review (Louisiana)

OIG: Office of the Inspector General (USDOE)

OMB: Office of Management & Budget

OCTAE: Office of Career, Technical, & Adult Education (USDOE)

POS: Program of Study

PRC: Perkins Regional Coalition

PRCC: Perkins Regional Coalition Coordinator

RFP: Request for Proposal

T&E: Time and Effort

USDOE: United States Dept. of Education

WIOA: Workforce Innovation & Opportunity Act of 2014

Introduction

This manual sets forth the policies and procedures used by the Louisiana Community and Technical College System (LCTCS) to administer the Strengthening Career and Technical Education for the 21st Century Act (Perkins V). The LCTCS has undertaken the development of this manual to provide staff, eligible subrecipients, and the public the highest level of transparency as to the processes used by the LCTCS in the administration of this federal program. The Legislative Auditor of Louisiana, U.S. Education Department's Office of Inspector General (OIG), and Office of Career, Technical and Adult Education (OCTAE) may rely on the procedures and internal controls described herein to assess LCTCS' compliance with the following:

- Strengthening Career and Technical Education for the 21st Century Act (Perkins V);
- Education Department General Administrative Regulations (EDGAR); and
- The Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 C.F.R. Part 200).

New employees of the LCTCS and subrecipients are expected to familiarize themselves with this manual. It serves as a useful tool, simplifying the often-complicated landscape of Perkins V and federal education grants management. The manual sets forth a clear road map of the programmatic and administrative requirements of Perkins V.

The programmatic portion explains the structure of the amended Perkins Act, including:

- Framework of the Federal Statute;
- Use of Funds at the State Level;
- Allocation of Federal Funds;
- Accountability Requirements;
- High Quality Career and Technical Education (CTE) Programming;
- Use of Funds at the Local Level;
- Programmatic Fiscal Requirements; and
- Monitoring Process.

The fiscal grants management and compliance portion presents the processes used by the LCTCS and exhibits alignment with the EDGAR guidelines. Specifically, this portion ensures that all Perkins funds are lawfully expended. It describes the:

- Financial Management System;
- Basic Cost Principles;
- Procurement Policies;
- Property Management;
- Record Keeping;
- Payroll & Time Distribution; and
- OMB Circular A-133 Audit Resolution.

This manual was not designed, nor should it be construed as a description of the policies and procedures of other programmatic divisions within the LCTCS. It is an organic document, which shall be periodically updated to reflect significant changes at the LCTCS.

Programmatic Aspects of the Perkins Grant

The Strengthening Career & Technical Education for the 21st Century Act (Perkins V)

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. It became effective on July 1, 2019. 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

The purpose of the Perkins V Act is to fully develop the academic knowledge, technical skills, and employability of secondary and postsecondary education students, who elect to enroll in CTE 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, local workforce investment boards, business and industry, and intermediaries;

7. Providing individuals with opportunities to develop, in conjunction with other skills needed to keep the United States competitive; and

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.

Definitions

There are several definitions that can be found in Section 3 of the Perkins V Act; the most relevant definitions to the LCTCS are referenced below:

Alignment: The term "alignment" means curriculum laid out in a sequence of non-duplicated skills across the secondary-postsecondary continuum.

All Aspects of an Industry: The term "all aspects of an industry" means strong experience in, and comprehensive understanding of, the industry that the individual is preparing to enter.

Articulation: The term "articulation" means the alignment and comparability of coursework between secondary and postsecondary providing a comparable learning experience for which credit can be awarded by the postsecondary institution.

Career Pathway: The term "Career Pathway" means a series of structured and connected education programs and support services that enable students, often while they are working, to advance over time to better jobs and higher levels of education and training.

Career and Technical Education: The term "Career and Technical Education" means organized activities that:

A. Offer a sequence of courses that:
    - Provide individuals with rigorous academic content and relevant technical knowledge and skills needed to prepare for further education and careers in current or emerging professions, which may include high-skill, high-wage, or in-demand industry sectors or occupations, which shall be, at the secondary level aligned with the challenging State academic standards adopted under Every Student Succeeds Act (ESSA);
    - Provide technical skill proficiency or a recognized postsecondary credential, which may include an industry-recognized credential, a certificate, or an associate degree; and
    - May include prerequisite courses (other than a remedial course) that meet the requirements of this subparagraph.

B. Include competency-based, work-based, or other applied learning that supports the development of academic knowledge, higher-order reasoning, problem-solving skills, work attitudes, employability skills, technical skills, and occupation specific skills and knowledge of all aspects of an industry, including entrepreneurship;

C. To the extent practicable, coordinate between secondary and postsecondary education programs through Programs of Study, which may include coordination through articulation agreements, early college high school programs, dual or concurrent enrollment program opportunities, or other credit transfer agreements that provide postsecondary credit or advanced standing; and

D. May include career exploration at the high school level or as early as the middle grades (5-8) as defined in ESSA.

Certified Perkins V Representative: The LCTCS term "Certified Perkins V Representative" means that the institution's Perkins V Representative has completed the LCTCS sponsored EDGAR training and testing with a passing score.

Eligible Subrecipient: The term "eligible subrecipient" means:

A. A local educational agency (including a public charter school that operates as a local educational agency), an area career and technical education school, an educational service agency, an Indian Tribe, Tribal organization, or Tribal educational agency, or a consortium, eligible to receive assistance under section 131; or
B. An eligible institution or consortium of eligible institutions eligible to receive assistance under section 132.

Essential Employability Skills: The term "Essential Employability Skills" means the transferrable skills needed by an individual to make them employable. A group of essential abilities that involve the development of a knowledge base, expertise level, and mindset that is necessary for success in the modern workplace.

High-Skill Occupation: The term" high-skill occupation" is an occupation that requires an industry-recognized certificate, credential, postsecondary training, apprenticeship or postsecondary degree.

High-Wage Career: The term "high-wage career" is one with an average hourly rate equal to or greater than the average hourly rate of all occupations as reported by the Louisiana Employment Department.

In-Demand Industry: The term "in-demand industry" is defined as an occupation in which state, local or regional labor market data show that demand exceeds projected employment supply.

Justice Involved Person: The term "justice involved person" means a person currently or formerly incarcerated in the justice system.

Nonduplicative sequence: The term "nonduplicative sequence" means a sequence of academic and technical course content that extends across secondary and postsecondary institutions and culminates in a certificate, degree or Industry-Based Credential.

Non-Traditional Fields: The term "non-traditional fields" means occupations or fields of work, such as careers in computer science, technology, and other current and emerging high skill occupations, for which individuals from one gender comprise less than 25 percent of the individuals employed in each such occupation or field of work.

Priority Population: The term "priority population" is used in the Workforce Innovation and Opportunity Act. Individuals must be given priority to receive services if they are subrecipients of public assistance, low-income individuals or individuals who are basic skills deficient.

Perkins Eligible CTE Programs of Study: The term "Perkins Eligible CTE Programs of Study" means a coordinated, nonduplicative sequence of academic and technical content at the secondary and postsecondary level that:

- Incorporates challenging academic content;

- Addresses academic and technical knowledge and skills including essential employability skills;
- Aligns with the needs of business and industry in the state or region;
- Progresses in specificity; and
- Culminates in the attainment of a recognized postsecondary credential.

Quality: The term “quality” means eligible subrecipients offer students the opportunity to participate in Perkins Eligible CTE Programs of Study that lead to high-skill, high-wage, emerging and in-demand occupations.

Louisiana defines a high-wage career as one with an average hourly rate equal to or greater than the average hourly rate of all occupations within the region as reported by the Louisiana Workforce Council. High-skill occupations require an industry-recognized credential, postsecondary training, apprenticeship, or postsecondary degree.

The secondary Perkins Eligible CTE Programs of Study must provide an opportunity for dual credit, articulated credit, and/or industry-recognized credentials.

All postsecondary Perkins Eligible CTE Programs of Study must offer students the opportunity to earn an industry-recognized credential, license, associate or bachelor’s degree via dual enrollment, articulated credit and/or traditional enrollment.

Recognized Postsecondary Credential: The term ‘‘recognized postsecondary credential’’ means a credential consisting of an industry-recognized certificate or certification, a certificate of completion of an apprenticeship, a license recognized by the State and/or Federal Government, or an associate or baccalaureate degree.

Scope: The term “scope” requires a connection to exist between secondary and postsecondary CTE Programs evidenced by working agreements. This may include, but not limited to, articulation agreements, dual credit opportunities or aligned curriculum.

Program scope also provides an opportunity to gain strong experience in, and comprehensive understanding of, the full breadth of the subject including:

- Occupations and careers that comprise an industry, from basic to advanced;
- Principles of technology, labor and community issues, health and safety and environmental issues related to the industry;
- Demonstrate knowledge of the planning, management, financial, technical and production skills for the industry related to the Program;
- Emphasis on developing Essential Workplace Skills; and
- Participation in rigorous work-based learning that incorporates applied and contextualized learning.

Career and technical education Programs of Study should include traditional classroom experiences but should also be defined by authentic hands-on experiences for students.

Size: The term “size” means that Programs of Study should strive to meet the industry needs of the region or State. The capacity should be maximized at the local level to meet student demand and to ensure equitable access by all students.

Special Populations: The term “special populations” means—

A. Individuals with disabilities;
B. Individuals from economically disadvantaged families, including low-income youth and adults;
C. Individuals preparing for non-traditional fields;
D. Single parents, including single pregnant women;
E. Out-of-workforce individuals;
F. English learners;
G. Homeless individuals described in section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
H. Justice-involved individuals;
I. Youth who are in, or have aged out of, the foster care system; and
J. Youth with a parent who—
   i. Is a member of the armed forces (as such term is defined in section 101(a)(4) of title 10, United States Code); and
   ii. Is on active duty (as such term is defined in section 101(d)(1) of such title).

Under-Resourced Person: The term “under-resourced person” refers to a person with insufficient resources.

Work-Based Learning: The term “work-based learning” means sustained interactions with industry or community professionals in real workplace settings to the extent practicable, or simulated environments at an educational institution that foster in-depth, firsthand engagement with the tasks required in a given career field that is aligned to curriculum and instruction.

Respective Role of “State Eligible Agency”

The LCTCS, as the State eligible agency under Perkins V, receives the direct grant from the United States Department of Education (USDOE). Through a Memorandum of Understanding (MOU), the LCTCS delegates to the Louisiana Department of Education (LDE) the responsibility for administering Perkins V at the secondary level, and to further CTE program outcomes and focus on activities to foster student success related activities. The LCTCS remains responsible for administering and supervising CTE activities at the postsecondary level. Under Perkins V, a more direct service model will be employed for Career and Technical Education. The LCTCS will grant funds directly to the Department of Public Safety and Corrections (DPS&C). LDE will provide funding to the Office of Juvenile Justice (OJJ) and to the Louisiana School for the Deaf and Visually Impaired (LSDVI).

The LCTCS, as the pass-through agency for Perkins funds must ensure that all subrecipients are using sub-grant funds in compliance with applicable Federal and State requirements. As part of this responsibility, the LCTCS must evaluate the risk of noncompliance for each subrecipient and appropriately monitor. For more information on the LCTCS subrecipient monitoring procedures, see the *Monitoring Process*.

LCTCS Organizational Structure and Functions

The LCTCS is divided into eight offices or groups as follows:

- President's Office
- Academic Affairs
- Enrollment Management
- Operations (Information Technology, Facilities, Finance, and Human Resources)
- Public Affairs
- Internal Audit
- Workforce Policy
- Workforce Solutions (MEPOL)

Each office contributes to the Perkins grant requirements. The following are the major responsibilities of each group:

- The President's Office provides support via communication with Chancellors and innovative projects.

- Academic Affairs is responsible for data collection for Perkins reports and the alignment of CTE programs with workforce demands.

- Enrollment Management supports program enrollment growth for the colleges. This includes professional development providing innovative strategies to grow and retain enrollment.

- Operations houses sub-offices or divisions. These sub-offices/divisions include: Information Technology, Facilities, Finance, and Human Resources. The Finance and Administration staff are responsible for, among other things, overseeing the accounts payable and receivable functions at the State level as well as processing grant payments to eligible subrecipients, monitoring and managing the budget allocations for Perkins at the State level and monitoring the procurement and inventory processes at the State level.

- Public Affairs develops and implements marketing strategies to support Perkins supported programs.

- Internal Audit evaluates the LCTCS and the institution's internal control processes. The department's activities are inclusive of accounting processes, corporate governance, protecting against fraud, and organizational risk management, etc.

- Workforce Policy (External Affairs) leads the development of policies and procedures to support all programs at the LCTCS colleges. This includes, but is not limited to, Perkins V implementation.

- Workforce Solutions houses the MEPOL Program. It is designed so that small to medium-sized manufacturers are made aware of, and have access to, key industry technological advances, as well as industry specific and general training opportunities. In order to meet the objectives of the program, the MEPOL staff is tasked with building working relationships with manufacturers across the state. MEPOL works to assess the needs of the companies, as well as working with the manufacturers who have special training needs. If MEPOL staff is unable to provide for the request internally, it will be outsourced to a third-party company, via a contract, to be provided to the manufacturer. MEPOL is currently working on the establishment of Subrecipient Agreements (SRAs) with several community colleges within the LCTCS system to further the expansion of the work within the manufacturing community.

LCTCS' Administration of Perkins V for Postsecondary Subrecipients

The Louisiana Constitution authorizes the Board of Regents to plan, coordinate, and manage the budget for Louisiana's public higher education community. The agency also serves as the state liaison to Louisiana's accredited and independent institutions of higher learning. The Board of Regents is a policymaking and coordinating board only. It is not directly involved in overseeing the day-to-day operations of college campuses. For the purposes of the Perkins grant, day-to-day operations are handled by the LCTCS, the Louisiana Carl Perkins Eligible Agency.

Funds are allocated to postsecondary subrecipients based on the number of **full-time** federal Pell Grant recipients enrolled in CTE programs and the number of **full-time** Workforce Innovation and Opportunity Act (WIOA) supported students enrolled in approved CTE programs at institutions and those that are part of the consortium. **(LCTCS FY 2020-2021)**

Funds allocated to consortiums must be used for purposes and programs that are mutually beneficial to all members of the consortium. Pursuant to section 132(a)(3) of Perkins, funds may not be reallocated to individual members of the consortium based on the individual member's Pell Grant or WIOA count for purposes or programs benefitting only one member of the consortium.

The OCTAE approved allocation formula for the **LCTCS FY 2021-2022 and hereafter**, duplicates the count of students in CTE programs that:

- Receive Pell assistance = 1.0
- Receive WIOA assistance = 1.0
- Participates in an approved Integrated Education and Training (IET) model that is part of an approved Perkins Eligible CTE Program of Study, through the WorkReady U program = 0.25
- Completes an approved IET model that is part of an approved Perkins Eligible CTE Program of Study, through the WorkReady U program = 1.0

For additional information see *Allocation of Federal Funds, Step 1*.

Each subrecipient has a Perkins Coordinator who is responsible for the administration of the Perkins program at the subrecipient's institution. Additionally, each subrecipient has a Certified Perkins Representative who is responsible for reviewing and approving all subrecipient expenditures for allowability (see *Financial Management System: Overview of LCTCS Financial Management/Accounting System* section for more information).

Use of Funds at the State Level

This section discusses the specific uses for which a state is authorized to spend its Perkins allocation, and how much shall be expended within specific categories. As specified in the Act, Section 112, Louisiana's funds are allocated and distributed among four categories:

- State Administration;
- State Leadership;
- Formula Distribution to Eligible Subrecipients; and
- Reserve Grants.

Administration

Pursuant to section 112(a)(3) of Perkins V, a State shall spend no more than 5% or $250,000, whichever is greater, for administration of the state plan. Administrative activities include:

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

The LCTCS typically spends its administrative allocation primarily on salaries, and a nominal amount on equipment, supplies, and other consumables necessary to administer the Perkins V program. As noted below, there is a matching requirement under the administration allocation. The State must match, with non-federal funds and on a dollar-for-dollar basis, all Perkins funds spent on administration.

Leadership

The LCTCS will continue to use Leadership funds to improve CTE for activities that support:

- Preparation for non-traditional fields;
- Programs for special populations, individuals in state institutions, CTE faculty/personnel; and
- Technical assistance for eligible subrecipients.

Pursuant to section 112(a)(2) of Perkins, a state may not spend more than 10% on leadership activities. Under Perkins V, the Leadership Funds now have permissive use of funds. The permissive use of funds provides greater flexibility than the Perkins IV required use of funds. See Section 124(b) for examples of permissible leadership activities. Additionally, as a required set-aside, the state must spend an amount equal to, and not more than 2% of this 10% to serve individuals in state institutions, such as state correctional institutions, juvenile justice facilities, and educational institutions that serve individuals with disabilities.

"Pass-Through" to Eligible Subrecipients

Pursuant to section 112(a)(1) of Perkins V, at least 85% of a state's Perkins grant must be distributed to eligible subrecipients. The LCTCS appropriates the optional reserve funds of which up to 15% of the 85% for uses consistent with section 135(b) but may not be allocated outside the section 132 formula. The reserve allocation is explained in more detail in the next section.

As required by Perkins section 135(d), a subrecipient may not use more than 5% of its subgrant for administrative expenditures. The remaining 95% must be spent on activities that are consistent with section 135. See *Uses of Funds at the Local Level* for more information.

Reserve

Pursuant to section 112(a)(1) of Perkins V, a state may reserve no more than 15% of the 85% to make grant awards to eligible subrecipients to carry out the activities enumerated in Section 135 of Perkins V. The LCTCS has allocated the Reserve Funds to identify and promote proven CTE programs, inclusive of strategies that prepare students for nontraditional career fields. Additionally, the Reserve Funds will foster the development and implementation of aligned programs of study with Louisiana's in-demand occupations. Of the funds available under Section 112(a)(1), approximately 15% will be used for the Reserve Fund as specified in Section 112(c).

For the next three to five fiscal years, a portion of the Reserve Funds will be utilized to support the work of the Perkins Regional Coalitions (PRC). There are eight regional coalitions mirroring the Louisiana Workforce Commissions (LWC), Regional Labor Market Areas. The funds are directed to the postsecondary institution selected as the PRC lead. The selection of the lead institution is determined by the LCTCS. Each region is led by the Perkins Regional Coalition Coordinator (PRCC). The purpose of the regional approach is to better target the needs of industry, including small and medium-sized enterprises, and to ensure that Perkins V funds are focused on achieving the greatest outcomes. The total amount dedicated to the Regional Coalition work will vary from year-to-year and is dependent upon the tasks to support the regional work. Examples of expenditures are:

- Development of the Regional Needs Assessment;
- Development of Perkins Eligible CTE Programs of Study (POS);
- Professional development;
- Travel;
- Stipends; and
- PRCC salary and other expenditures for the direct support of the Perkins Regional Coalition.

The balance of the Reserve Funds will be utilized to expand and support Perkins Eligible CTE Programs of Study dual enrollment opportunities throughout the rural areas of the state, emerging occupations via Perkins Eligible CTE Programs of Study, and other projects meeting the guidelines for Reserve Fund expenditures. Projects may vary annually, based on the needs of the regions.

The responsibility for the administration of the Reserve Funds will be fulfilled by the LCTCS.

Allocation of Federal Funds

The Perkins V State Director is responsible for allocating funds made available under the Perkins V grant. The LCTCS learns the amount of its Perkins V Grant Award from USDOE generally between February and April for the grant period starting the following July 1st. Based on this figure, the Perkins State Director will budget not more than 5% or $250,000, whichever is greater, for administration, not more than 10% for leadership, and the remaining 85% for the pass-through to eligible subrecipients and the Reserve Fund.

Pursuant to section 112(a)(2), the Perkins State Director will also determine the allocation for state correctional institutions, juvenile justice facilities, and institutions that serve individuals with disabilities. The allocation cannot exceed more than 2% of Louisiana's leadership funds. To make the determination regarding the new allocation, the prior year's allocation, review of performance indicator data, and the needs of individuals will be assessed. The LCTCS has been granted a continuation waiver, for postsecondary funding allocation, to include CTE students receiving WIOA assistance for FY 2020-2021. The LCTCS' new fiscal waiver will be implemented during FY 2021-22 (details to follow in this document).

Basic Allocation

Funds are allocated to subrecipients based on the number of **full-time** federal Pell Grant recipients enrolled in CTE programs and the number of **full-time** Workforce Innovation and Opportunity Act (WIOA) supported students enrolled in approved CTE programs at institutions and those that are part of the consortium. **(LCTCS FY 2020-2021)**

Funds allocated to consortiums must be used for purposes and programs that are mutually beneficial to all members of the consortium. Pursuant to section 132(a)(3) of Perkins, funds may not be reallocated to individual members of the consortium based on the individual member's Pell Grant or WIOA count for purposes or programs benefitting only one member of the consortium.

The OCTAE approved allocation formula, for the **LCTCS FY 2021-2022 and hereafter**, duplicates the count of students in CTE programs that:

- Receive Pell assistance = 1.0
- Receive WIOA assistance = 1.0
- Participates in an approved Integrated Education and Training (IET) model that is part of an approved Perkins Eligible CTE Program of Study, through the WorkReady U program = 0.25
- Completes an approved IET model that is part of an approved Perkins Eligible CTE Program of Study, through the WorkReady U program = 1.0

The steps for determining the distribution to eligible subrecipients are as follows:

STEP 1 – Collect Number of Pell Grant and WIOA Recipients at Colleges (**Note: the process within STEP 1 will change in FY 2021 – 2022 and hereafter, to collect IET information**)

The following process within STEP 1, has been utilized historically. Pursuant to section 133 of the Perkins statute, Louisiana received a waiver for allocating Perkins V funds at the postsecondary level. Thus, the distribution to postsecondary subrecipients is based on the number of **full-time** federal Pell Grant recipients enrolled in CTE programs and the number of **full-time** WIOA supported students enrolled in approved CTE programs (not including students receiving support for short-term training). In order to determine the distribution to postsecondary subrecipients, the Perkins State Director sends a fillable template to the Perkins Coordinator for each subrecipient asking them to report:

- The number of **full-time** Pell Grants awarded to students enrolled in approved CTE programs leading to the attainment of an Associate Degree, a Technical Diploma, or a Certificate of Technical Studies. The Pell count is unduplicated; therefore, if a student received a Pell Grant for both the fall and spring semesters that student is counted once.
- The number of **full-time** WIOA supported students enrolled in approved CTE programs. This count does not include students receiving support for short-term training earning less than one of the credentials mentioned above. A student may be a Pell subrecipient and a WIOA participant for purposes of the count.
- Students must be enrolled in a CTE program of study. Students enrolled in prerequisite courses, awaiting admission into the program, should NOT be included in the count.

The email is sent to the Perkins Coordinators in early February. The Perkins Coordinators must have the data submitted to the Perkins State Director no later than early Spring. Perkins Coordinators are asked to report the figures in a form provided with the initial directions. Documentation supporting the figures must be submitted to the LCTCS with the data documents. Any eligible subrecipient that fails to meet the deadline may not receive funds for the program year starting on July 1. Inaccurate or undocumented figures by an eligible subrecipient could result in that eligible subrecipient having to repay Perkins funds.

Note: This process will become more inclusive during the 2021 – 2022 fiscal year and hereafter. The LCTCS will begin to include the participants and completions of students enrolled in Integrated Education and Training (IET) programs under WorkReady U (Adult Education program).

Step 2 and Step 3 were used for the 2020 – 2021 fiscal year.

STEP 2 – Calculate Percentage

Using the above-collected numbers, each eligible subrecipient's total number of state-wide Pell Grant and WIOA recipients is calculated by taking the number of Pell Grant and WIOA recipients for each eligible recipient and dividing that number by the total number of Pell Grant and WIOA recipients in programs in the state.

STEP 3 – Calculate Allocation

Finally, each subrecipients' allocation is calculated by multiplying the total unduplicated number obtained in Step 2 by the total amount of funds being passed through to eligible subrecipients (minus the amount of the reserve).

Note: Postsecondary eligible subrecipients whose allocation does not equal the required $50,000 minimum will be encouraged to form or join a consortium with another eligible subrecipient to receive Perkins V funds. The consortium will have to appoint a fiscal agent, who has the responsibility for submitting the local application that addresses the consortium.

Carryover Allocation

All Perkins V flow-through funds not obligated within the first 12 months of the award are carried over and budgeted in the same set-aside for distribution to the subrecipients. All carried over funds are subject to the same programmatic and fiscal requirements as funds allocated in the current year.

Any funds not expended by the subrecipients are reallocated. The Grants Accounting Analyst in the finance department will know the amount of carryover funds by the end of August. The Grants Accounting Analyst confirms the amount and informs the State Perkins V Director. The State Perkins V Director then completes the allocation formula. In August/September, the State Perkins V Director will notify the subrecipients of the amount of carryover funds the institution will receive. The subrecipients are instructed to obligate the carryover funds, as expeditiously as possible, to prevent the lapsing of funds. Subrecipients must complete an application for the carryover funds in the eGrants portal. All tasks, such as revisions, reimbursements and reports, are completed via the eGrants portal.

If the Grants Accounting Analyst notices that a subrecipient is not spending carryover funds, or is in danger of letting funds lapse, the Grants Accounting Analyst and the State Perkins V Director will provide technical assistance as needed.

New: Carryover Local Application Plans (LAPs) must adhere to the LAP guidance. This includes, but is not limited to, the CLNA.

Reserve Funds

The LCTCS may reserve no more than 15% of the 85% to make grant awards to eligible subrecipients to carry out the activities enumerated in Section 135 of Perkins V. The LCTCS has allocated the Reserve Funds to identify and promote proven CTE programs, inclusive of strategies that prepare students for nontraditional career fields. Additionally, the Reserve Funds will foster the development and implementation of aligned programs of study with Louisiana's in-demand occupations. Of the funds available under Section 112(a)(1), approximately 15% will be used for the Reserve Fund as specified in Section 112(c).

Accountability Requirements

The Perkins V grant is integrally tied into an accountability system. It assesses the effectiveness of the state and the eligible subrecipients of the state in achieving statewide progress and continuous improvement in CTE. This section provides details regarding the standards for LCTCS measurement of effectiveness under Sec. 113 of Perkins V. It measures the levels of effectiveness attained, the method by which effectiveness is achieved, and how effectiveness is reported to the USDOE. Perkins V allows Louisiana to determine performance measures, and how the population is measured (CTE Concentrators). In short, it creates a maximized opportunity for success and growth.

Core Indicators of Performance

Effectiveness in CTE is assessed through performance measures. These measures are called Core Indicators of Performance. There are three required core indicators of performance at the postsecondary level. Under Perkins V, the indicators of performance are based upon the postsecondary concentrator definition.

Postsecondary CTE Concentrator: A student enrolled in an eligible subrecipient institution who has:

a) Earned at least 12 credits within a career and technical education program or Perkins Eligible CTE Program of Study; or
b) Completed such a program if the program encompasses fewer than 12 credits or the equivalent in total.

The LCTCS' Core Performance Indicators are described in the chart below.

Measurement Definition	Indicator Codes	Indicator Names
The percentage of CTE concentrators who, during the second quarter after program completion, remain enrolled in postsecondary education, are in advanced training, military service, or a service program that receives assistance under Title I of the National and Community Services Act of 1990 (42 U.S.C. 12511 et seq.), or volunteers as described in section 5(a) of the Peace Corps Act (22 U.S. C. 2504(a)), or are placed or retained in employment. **Numerator:** The distinct number of CTE concentrators who completed a CTE program and meet one of the following criteria (the student can only be counted once, if they meet multiple criteria) after the second quarter of program completion: The distinct number of CTE concentrators who remained enrolled in postsecondary education from the previous academic year; or Received an award (graduated) during the previous academic year where the student's placement in advanced training, military services or a service program that receives assistance under the National Community Service Act; or placed or retained employment. **Denominator:** The distinct number of CTE concentrators who completed a CTE program.	1P1	Postsecondary Retention and Placement
The percentage of CTE concentrators who receive a recognized postsecondary credential during participation in or within one year of program completion. * **Numerator:** The distinct number of CTE concentrators who completed a recognized post-secondary credential during the program participation year (that academic year); or returned to complete a recognized postsecondary credential within a year. **Denominator:** The distinct number of CTE	2P1	Earned Recognized Postsecondary Credential

concentrators who completed a recognized post-secondary credential during the program participation year (that academic year); or the previous year. And, the distinct number of CTE concentrators who left without completing a recognized post-secondary credential or enrolled in another postsecondary institution.		
The percentage of CTE concentrators in career and technical education programs and in programs of study that lead to non-traditional fields. **Numerator:** The distinct number of CTE concentrators who completed a program of study in a non-traditional field during the program participation year (academic year). These students must be in a program of study that is nontraditional for males or nontraditional for females to be counted in this measure. If the student completed more than one program of study that is considered nontraditional relative to their gender, they can only be counted once. **Denominator:** The distinct number of CTE concentrators who are enrolled and completed a program of study in a non-traditional field during the program participation year (academic year). These students must be in a program of study that is nontraditional for males or nontraditional for females to be counted in this measure. If the student is enrolled in or completed more than one program of study that is considered nontraditional relative to their gender, they can only be counted once.	3P1	Non-traditional Program Enrollment

*This means that a student is counted under this indicator whether the student obtains the credential during the participation or within 1 year of completion. The USDOE interprets "within 1 year of completion" as the student would be counted, if the student obtains the credential in the 1 year following that student's completion of the program.

Levels of Performance

Each core indicator of performance has an established level of performance, by which the core indicator is measured from year-to-year. Under Perkins V, Louisiana determined the performance level for all four years of the grant, with the input of stakeholders. Louisiana allotted more than the prescribed sixty days for public comment and solicited comments in multiple cities across the State for in-person discussions. All public comments were taken into consideration when making the determination. The determined performance levels are inclusive of the Section 113(b)(2)(B) minimum requirements.

State Levels of Performance

The State levels of performance were determined by an analysis of the LCTCS Institutional Research Department's targeted reports and objective Perkins V data reports from each postsecondary eligible subrecipient. (i.e. Perkins IV reports vs Perkins V reports) An aggressive and progressive comparison of the reports was performed to create the baseline state levels of performance. The chart below provides the State level of performance assigned, based upon the persuasive data and historical data.

Postsecondary Indicators	Baseline Levels	Performance Levels			
		FY 2020	FY 2021	FY 2022	FY 2023
1P1: Post-Program Placement	64%	66%	68%	70%	72%
2P1: Earned Recognized Postsecondary Credential	56%	58%	60%	62%	64%
3P1: Non-traditional Program Enrollment	20%	20.5%	21%	21.5%	22%

Local Levels of Performance

Historically, eligible subrecipients at the postsecondary level are given the opportunity to accept or negotiate a higher level for the above levels of performance. Under Perkins V, all levels of performance for core indicators shall be the same for all CTE concentrators in the state.

Consolidated Annual Report

Each December, the LCTCS in collaboration with LDE, must prepare and submit a Consolidated Annual Report (CAR) to USDOE. The CAR provides the progress of the state in achieving the state adjusted levels of performance. For every core indicator of performance, the disaggregate data for each category of students is broken down by race, ethnicity, and special population. Subsequently, an additional disaggregation process is performed. The process is repeated by programs of study or the career clusters of the CTE concentrators, when appropriate. (Sec. 113[b][3][C]) The CAR also includes a Financial Status Report showing the amount of funds expended on each part of the statute and a narrative describing the activities that the state is carrying out with the grant funds.

The Institutional Research Office is responsible for data collection. Training on data collection and reporting is provided for subrecipients in September/October. Subrecipients are given instructions for reporting performance data at the training, and the reports are due back to the LCTCS by mid-November.

Additionally, the LCTCS has a Data Sharing Agreement with the LWC. Under this agreement, the LWC, at the request of the LCTCS, will share job training, placement data, and unemployment data. The LCTCS uses this data in coordination with the data obtained from the colleges to report on performance measures in the CAR. The Perkins V State Director works with LDE to create the narrative that is part of the CAR.

Financial Status Report

As noted above, Financial Status Reports (FSR) must be submitted as part of the CAR each December. A final FSR (for the grant that was closed out the past September) and an interim FSR (for the grant that is still open) must be submitted. Gathering the information and creating the FSR is the responsibility of the Grant Accounting Analyst in the Finance Division of the Finance and Administration Office. Project Completion Reports from all subrecipients, including LDE, for all grant funds are due to the LCTCS by August 15. The Project Completion Reports contain a final summary of the subrecipient's most recent approved budget, the amount of funds requested by reimbursement, the amount of funds expended, and the amount of unobligated funds. (Financial reports pursuant to 2 CFR 200.327 and 34 CFR 76.720) The reports are completed in the eGrants System.

In October, the Grant Accounting Analyst will run the appropriate expenditure reports for the grants in question. Using the information from the expenditure reports and the information obtained in the Project Completion Reports, the Grant Accounting Analyst will enter the necessary information into the FSR. The Grant Accounting Analyst will get information regarding non-federal expenditures from the Director of Fiscal Affairs. The completed FSR is authorized and submitted with the CAR by the LCTCS' Associate Director of Fiscal Affairs to USDOE.

Improvement Plans

Each subrecipient is accountable for reviewing its' Perkins V Eligible CTE Programs of Study. The subrecipients must ensure the POS are continuously improving the results of the performance targets described in Perkins V. If the subrecipient does not meet the performance targets, the LCTCS provides technical assistance to the subrecipient to implement an improvement plan. The improvement plan must include a data gap analysis for each special population group that falls below the performance target. The analysis must include specific actions to address the performance gap. Ultimately, the state has the authority to sanction subrecipients, if there is no improvement within three years.

When a subrecipient has not met one or more adjusted level(s) of performance for a program year, that subrecipient must submit a local program improvement plan, along with other necessary documentation (discussed in the *LAP* section of this manual) in order to receive its Perkins allocation for the upcoming program year. The Improvement Plan must be approved by the LCTCS prior to the subrecipient receiving its award letter for the upcoming program year. Additionally, institutions must submit quarterly reports that support implementation of the program improvement plan. Review of improvement plans and supporting documentation will be included in Perkins V programmatic monitoring.

The improvement plan must have a scope capable of achieving a measurable outcome. Responsibility for data collection, reporting of data, etc. must be identified within the scope portion of the improvement plan. The LCTCS may, after due process, withhold from a subrecipient all or a portion of the subrecipient's allotment if the subrecipient:

1. Fails to implement an improvement plan;
2. Fails to make any improvements in meeting any local adjusted level of performance for the core indicator identified in an improvement plan within the first year of the plan's implementation; or
3. Fails to meet at least 90% of an agreed upon local adjustment level of performance for the same core indicator of performance for 3 consecutive years.

High – Quality CTE Programming

The defining of Perkins V Eligible CTE Programs of Study expanded in the amended Act, may have the greatest impact on the future CTE workforce. The alignment of ESSA and WIOA to the amended Act will allow institutions and states to streamline services, while offering higher quality programs. Eligible subrecipients offer students the opportunity to participate in Perkins V Eligible CTE POS that lead to high-skill, high-wage, in-demand or emerging occupations. High-quality CTE programming creates a criterion designed to ensure local CTE programs have the framework to support student credentialing from secondary to postsecondary and through workforce training. The LWC defines a high-wage career as one with an average hourly rate, equal to, or greater than the average hourly rate of all occupations reported by the LWC. An in-demand industry is defined as an occupation in which state, local, or regional market data shows that demand exceeds projected employment supply. The projections are ranked into levels, with the levels of greater projected demand ranking higher. Hence, the occupation is rated with 3, 4, or 5 stars on the LWC Star Jobs Rating Occupational Forecast. Perkins Eligible CTE POS must include 4- or 5-star occupations. However, 3-star occupations are allowable within a Perkins Eligible CTE POS when it is within the career pathway and/or, credential which leads to a 4- or 5-star occupation. High-skill occupations require an industry-recognized certificate, credential, postsecondary training, apprenticeship, or postsecondary degree. All postsecondary Perkins Eligible CTE POS must offer students the opportunity to earn an industry-recognized credential, license, technical degree, associate or bachelor's degree via dual enrollment, articulated credit, and/or traditional enrollment. The secondary Perkins Eligible CTE POS must provide an opportunity for dual credit, articulated credit, and/or industry-recognized credentials. The term "programs of study" introduced in Perkins IV sought for students to progress through programs and obtain credentialing. Perkins V provides an in-depth definition for POS. A Perkins V Eligible CTE POS is a coordinated, nonduplicative sequence of academic and technical content at the secondary and postsecondary level that:

- Incorporates challenging academic content;
- Addresses academic and technical knowledge and skills including essential employability skills;
- Aligns with the needs of business and industry in the state or region;
- Progresses in specificity; and
- Culminates in the attainment of a recognized postsecondary credential.

Louisiana's Perkins V Eligible CTE POS will more efficiently supply the industry needs of the region and/or state. The Perkins Eligible CTE POS will balance labor market data and the student demand to ensure equitable access by all students. Links must exist between secondary and postsecondary CTE Programs evidenced by working agreements. The Perkins V Eligible CTE POS will also incorporate the Statewide Focus List of IBCs, recognized by the Louisiana Industry-Based Certification Council. Perkins V Eligible CTE POS are designed to allow flexibility, achievement, and a more progressive credentialing of students. This may include, but is not limited to, articulation agreements, dual credit opportunities, prior learning credit, and/or aligned curriculum. Perkins V funds will only be utilized to support Perkins V Eligible CTE POS beginning with the fiscal year 2021.

Perkins Regional Coalition Coordinator (PRCC):

The LCTCS designated an individual, designated as the PRCC in each of the eight RLMAs. To ensure that Perkins funds are focused on achieving the most positive outcomes for all citizens, Louisiana is emphasizing regional focused planning for Perkins V. The state is requiring all Perkins V eligible subrecipients, at secondary and post-secondary levels, to enter regional partnerships based on the RLMAs identified by the LWC. Consequently, the PRCs are aligned with the regions identified within the Workforce Innovation and Opportunity Act (WIOA). The PRCC represents the interest of the region and all members of the PRC. The PRCC supports the combined work of the Coalition. The PRCC's general tasks and duties include, but are not limited to:

- Providing leadership to the Coalition by scheduling, planning, and facilitating meetings;
- Leading an annual cycle to meet all program requirements, such as:
    - Conducting the regional needs assessment;
    - Leading regional goal setting;
    - Collecting information and submitting the annual report;
    - Facilitating Perkins Eligible CTE Programs of Study approval; and
    - Keeping accurate records;
- Building and maintaining relationships with new and existing partners and inviting members of the Regional Coalition to meetings;
- Scheduling presentations of workforce data with the specialists to ensure accurate LWC and consistent interpretation of data;
- Facilitating Perkins Eligible CTE Programs of Study improvement through vertical peer-to-peer collaboration within clusters;
- Planning and conducting regional grant activities;
- Acting as point of contact for the region; and
- Participating in PRCC training and professional development.

LCTCS' Implementation of Programs of Study Timeline

2019 – 2020	2020 – 2021	2021 – Beyond
Yearlong – Provided professional development to Perkins V leadership staff. Fall – Developed criteria and evaluation tool for Perkins Eligible CTE Programs of Study that are sufficient in size, scope, and quality. Winter – Developed & implemented a State approved process for programs to become Perkins Eligible CTE Programs of Study. Spring – Developed an action plan for those programs seeking the Perkins Eligible CTE Program of Study designation in collaboration with Perkins Regional Coalition Coordinators, secondary school designees and local instructors. Summer – Begin regional industry and instructor collaboration for vertical, non-duplicative alignment of programs.	Summer – Continue implementation of action plan for each program & designate Perkins Eligible CTE Programs of Study for funding for 2021 – 2022 school year. Fall – Develop a process for new and emerging programs to gain designation. Winter – Review and update criteria, evaluation & approval process contained in written guidance documents.	Ongoing – Utilize the written guidelines to develop Perkins Eligible CTE Programs of Study for approval. Fall – Ensure data collection systems are realigned with Perkins Eligible CTE Programs of Study designation & develop a process for Perkins Eligible CTE Programs of Study renewal. The renewal process will ensure programs continue to be sufficient in size, scope, and quality.

Uses of Funds at the Local Level

This section discusses the specific uses of funds for which an eligible subrecipient is authorized to spend its Perkins allocation and how much must be spent towards each use.

Administration

As required by Perkins section 135(d), a subrecipient shall not use more than 5% of its allocation for administrative expenditures. Administrative activities are those activities necessary for the proper and efficient performance of the eligible subrecipient's duties under Perkins V, including the supervision of such activities. Section 3(1) of the Perkins Act V defines the term administration when used with respect to an eligible agency or eligible subrecipient. Administrative activities do not include curriculum development, personnel development, or research activities. Any cost that supports the management of the Perkins V program is administrative in nature. Examples of allowable administrative costs include, but are not limited to, the salary costs associated with the development of the LAP and Perkins V administrative travel. All Perkins V funded travel by an institution's Perkins V administrators must come out of the local administrative set-aside. A Perkins V administrator or coordinator is one who facilitates the local application implementation and management within an institution. He or she also aids in the execution of regional targets. Administrative costs must be tracked separately from program costs. See the *Basic Cost Principles Travel and Transportation Section* for more information on travel.

Note: Administrative travel must be directly related to activities in progressing Louisiana's Strategic Vision for CTE and Perkins V.

Program Activities

The remaining 95% of a subrecipient's grant must be spent on activities that are consistent with Section 135 of Perkins V. Under Perkins V, eligible subrecipients must expend funds on activities that lead to high-wage, in-demand, and high-skill occupations in order to enhance the state and local economic competitiveness and productivity for all citizens. Section 135(b) *Required Uses*: Funds made available to eligible subrecipients under this part shall be used to support CTE programs that are adequate in size, scope, and quality to be effective and that:

1. Provide career exploration and career development activities through an organized, systematic framework designed to aid students, including in the middle grades, before enrolling and while participating in a career and technical education program, in making informed plans and decisions about future education and career opportunities and programs of study, which may include the following:

    A. Introductory courses or activities focused on career exploration and career awareness, including non-traditional fields;

    B. Readily available career and labor market information, including information on—
        i. Occupational supply and demand;
        ii. Educational requirements;
        iii. Other information on careers aligned to State, local, or Tribal (as applicable) economic priorities; and
        iv. Employment sectors.

    C. Programs and activities related to the development of student graduation and career plans;

    D. Career guidance and academic counselors that provide information on postsecondary education and career options;

    E. Any other activity that advances knowledge of career opportunities and assists students in making informed decisions about future education and employment goals, including non-traditional fields; or

    F. Providing students with strong experiences in, and comprehensive understanding of, all aspects of an industry;

2. Provide professional development for teachers, faculty, school leaders, administrators, specialized instructional support personnel, career guidance and academic counselors, or paraprofessionals, which may include the following:

    A. Professional development on supporting individualized academic and career and technical education instructional approaches, including the integration of academic and career and technical education standards and curricula;

    B. Professional development on ensuring labor market information is used to inform the programs, guidance, and advisement offered to students, including information provided under section 15(e)(2)(C) of the Wagner-Peyser Act (29 U.S.C. 49l–2(e)(2)(C));

    C. Providing teachers, faculty, school leaders, administrators, specialized instructional support personnel, career guidance and academic counselors, or paraprofessionals, as appropriate, with opportunities to advance knowledge, skills, and understanding of all aspects of an industry, including the latest workplace equipment, technologies, standards, and credentials;

    D. Supporting school leaders and administrators in managing career and technical education programs in the schools, institutions, or local educational agencies of such school leaders or administrators;

    E. Supporting the implementation of strategies to improve student achievement and close gaps in student participation and performance in career and technical education programs;

    F. Providing teachers, faculty, specialized instructional support personnel, career guidance and academic counselors, principals, school leaders, or paraprofessionals, as appropriate, with opportunities to advance knowledge, skills, and understanding in pedagogical practices, including, to the extent the eligible subrecipient determines that such evidence is reasonably available, evidence-based pedagogical practices;

    G. Training teachers, faculty, school leaders, administrators, specialized instructional support personnel, career guidance and academic counselors, or paraprofessionals, as appropriate, to provide appropriate accommodations for individuals with disabilities, and students with disabilities who are provided accommodations under the Rehabilitation Act of 1973 (29 U.S.C. 701 et seq.) or the Individuals with Disabilities Education Act;

    H. Training teachers, faculty, specialized instructional support personnel, career guidance and academic counselors, and paraprofessionals in frameworks to effectively teach students, including a particular focus on students with disabilities and English learners, which may include universal design for learning, multi-tier systems of supports, and positive behavioral interventions and support; or

    I. Training for the effective use of community spaces that provide access to tools, technology, and knowledge for learners and entrepreneurs, such as makerspaces or libraries;

3. Provide within career and technical education the skills necessary to pursue careers in high-skill, high-wage, or in-demand industry sectors or occupations;

4. Support integration of academic skills into career and technical education programs and programs of study to

support the following:

A. CTE participants at the secondary school level in meeting the challenging state academic standards adopted under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965 by the state in which the eligible subrecipient is located; and
B. CTE participants at the postsecondary level in achieving academic skills;

5. Plan and carry out elements that support the implementation of career and technical education programs and programs of study that result in increasing student achievement of the local levels of performance established under section §113, which may include the following:

   A. A curriculum aligned with the requirements for a program of study;

   B. Sustaining relationships among education, business and industry, and other community stakeholders, including industry or sector partnerships in the local area, where applicable, that are designed to facilitate the process of continuously updating and aligning programs of study with skills that are in demand in the State, regional, or local economy, and in collaboration with business outreach staff in one-stop centers, as defined in section 3 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3102), and other appropriate organizations, including community-based and youth-serving organizations;

   C. Where appropriate, expanding opportunities for CTE concentrators to participate in accelerated learning programs (as described in section 4104(b)(3)(A)(i)(IV) of the Elementary and Secondary Education Act of 1965 (20 U.S.C. 7114(b)(3)(A)(i)(IV)), including dual or concurrent enrollment programs, early college high schools, and the development or implementation of articulation agreements as part of a career and technical education program of study;

   D. Using appropriate equipment, technology, and instructional materials (including support for library resources) aligned with business and industry needs, including machinery, testing equipment, tools, implements, hardware and software, and other new and emerging instructional materials;

   E. A continuum of work-based learning opportunities, including simulated work environments;

   F. Industry-recognized certification examinations or other assessments leading toward a recognized postsecondary credential;

   G. Recruiting and retaining career and technical education program teachers, faculty, school leaders, administrators, specialized instructional support personnel, career guidance and academic counselors, and paraprofessionals;

   H. Where applicable, coordinating with other education and workforce development programs and initiatives, including career pathways and sector partnerships developed under the Workforce Innovation and Opportunity Act (29 U.S.C. 3101 et seq.) and other Federal laws and initiatives that provide students with transition-related services, including the Individuals with Disabilities Education Act;

   I. Expanding opportunities for students to participate in distance career and technical education and blended learning programs;

J. Expanding opportunities for students to participate in competency-based education programs;

K. Improving career guidance and academic counseling programs that assist students in making informed academic and career and technical education decisions, including academic and financial aid counseling;

L. Supporting the integration of employability skills into career and technical education programs and programs of study, including through family and consumer science programs;

M. Supporting programs and activities that increase access, student engagement, and success in science, technology, engineering, and mathematics fields (including computer science and architecture) for students who are members of groups underrepresented in such subject fields;

N. Providing career and technical education, in a school or other educational setting, for adults or out of school youth to complete secondary school education or upgrade technical skills;

O. Supporting 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;

P. Making all forms of instructional content widely available, which may include use of open educational resources;

Q. Supporting the integration of arts and design skills, when appropriate, into career and technical education programs and programs of study;

R. Partnering with a qualified intermediary to improve training, the development of public-private partnerships, systems development, capacity building, and scalability of the delivery of high-quality career and technical education;

S. Reducing or eliminating out-of-pocket expenses for special populations participating in career and technical education, including those participating in dual or concurrent enrollment programs or early college high school programs, and supporting the costs associated with fees, transportation, child-care, or mobility challenges for those special populations; or

T. Other activities to improve career and technical education programs; and

6. Develop and implement evaluations of the activities carried out with funds under this part, including evaluations necessary to complete the comprehensive needs assessment required under section 134(c) and the local report required under section 113(b)(4)(B).

Comprehensive Local Needs Assessment (CLNA)

One of the most significant changes in Perkins V is the new requirement for eligible subrecipients to conduct a Comprehensive Local Needs Assessment (CLNA). The CLNA must be updated at least every two years. The

CLNA is designed to be the foundation of Perkins V implementation at the local level; thus, driving local application goals and expenditure decisions. The CLNAs give the region a chance to take an in-depth look at the local and regional CTE system and identify areas where targeted improvements can lead to increased opportunities for student success. The needs assessment, if implemented thoughtfully, can also be a powerful opportunity to engage stakeholders in a common understanding and vision for the future of CTE in the community.

The Louisiana Perkins V Core Implementation Team provided guidance and set the priorities for our State. The CLNA requires the following elements:

- Evaluation of Student Performance;
- Perkins Eligible CTE Programs of Study alignment to industry & economic demand;
- Progress toward implementation of Perkins Eligible CTE Programs of Study;
- Education retention & improvement; and
- Equity access and opportunities to high quality CTE programs for all students.

Local Application Plan (LAP)

The LAP describes how each subrecipient's CTE programs will be carried out with Perkins V grant funds, how CTE activities will be carried out with respect to meeting state and local adjusted levels of performance, and how the subrecipient will ensure compliance with Perkins V and state requirements. Activities described in the LAP should be employed as part of a three-year strategic planning process. As the focus of Perkins V is on the improvement of CTE, it is imperative that an eligible subrecipient's narrative discusses how the eligible subrecipient plans to use Perkins V funds over the course of a three-year period to improve its CTE programs and services/activities for CTE students. Eligible subrecipients can request a waiver, as needed during a three-year grant period, if the career clusters/pathways focus areas change due to modifications in the LAP goals, and/or if regional labor market demands change. Additionally, each budget line item must be tied to improvement of CTE.

Pursuant to Perkins V, for an eligible subrecipient to be allocated Perkins V grant funds, it must submit a local application plan (LAP). The LAP must be approved by the LCTCS. A LAP is submitted by subrecipients on an annual basis. An approved LAP constitutes an agreement between the subrecipient and the LCTCS. Perkins V provides more structured guidance and minimum requirements for the LAP, including a CLNA. The Perkins V annual LAP is comprised of various sections, within the LCTCS eGrants portal:

- Applicant Profile;
- Grant Narrative;
- Performance Evaluation;
- Required Uses of Funds;
- Summary Budget;
- Assurances;
- Certification; and
- Forms and Templates.

The templates utilized for eGrants include the following:

- Budget Narrative;
- Budget Summary, with Signatures;
- Carl Perkins Regional Programming Attestation 2020-2021 through 2023-2024;
- Consortium Guidelines & Agreements;
- Consumable Supplies Form;
- Cover Sheet;
- List of Property to be Purchased with Program Funds (Equipment Over $1,000);
- Non-Consumable Supplies;
- Operating Services Form;
- Personnel Activity Report (PAR);
- Position Description;
- Position Description Roster;
- Professional Service;
- Program Inventory; and
- Travel Summary.

Eligible subrecipients are required to complete and submit to the LCTCS the required elements of the application through the LCTCS Electronic Grants System (eGrants). All documents requiring signatures must be signed in blue ink and uploaded into eGrants during the LAP submission process.

Budget

As part of the LAP, all subrecipients must include a detailed budget and budget narrative. The budget narrative must provide details for all line items listed in the detailed budget. Specifically, the budget narrative must state the following:

- Description of items to be funded using Perkins terminology;
- Amount requested for expenditure;
- Expected outcomes of proposed expenditures;
- Address core indicators;
- Indicate Use of Funds as described in Section 135 of the Perkins Act; and
- Additional information as needed.

Subrecipients must classify all proposed expenditures within the following categories:

1. Salaries – The gross amount paid to permanent and temporary employees of the subrecipient. This may include anticipated overtime, sabbatical leave, instruction time and stipends, including personnel substituting for those permanent positions.

2. Related Employee Benefits – Fringe benefit payments, which may include: Social Security, Worker's Compensation, deferred compensation, Federal unemployment compensation, State unemployment compensation, retirement, and health insurance.

3. Professional & Technical Services – Professional or technical services provided by a consultant (i.e.,

contractor or vendor) to accomplish a specific study, project, task, other work statement or services which, by their nature, can be performed only by persons or firms with specialized skills and knowledge. Costs of professional and consultant services rendered by persons who are members of a profession or possess a special skill are allowable, when reasonable and necessary and when not contingent upon recovery of the costs from the federal funding. While a product may or may not result from the transaction, the primary reason for the purchase is the service provided. All professional service contracts entered by eligible subrecipients must be submitted to the LCTCS for review. Professional service contracts valued at or above $50,000 must also be approved by the System President (or designee) and the LCTCS Board of Supervisors.

4. Operating Services/Purchased Property Services – Services purchased to operate, repair, maintain, and rent property owned or used by the subgrantee. These services are performed by persons other than subrecipient's employees. While a product may or may not result from the transaction, the primary reason for the purchase is the service provided.

5. Travel-in-State and Out-of-State – Expenditures for transportation, meals, hotel, and other expenses associated with traveling related to allowable grant activities. Reimbursement for travel costs must be within the regulations found in the Louisiana's Travel Guide (PPM-49).

6. Supplies – An item to be purchased may be defined as a Consumable Supply or a Non-Consumable Supply.

    A. Consumable Supply – An item expected to serve its principal purpose for less than one year and is less than $1,000 per unit cost in value.
    B. Non-Consumable Supply – An item expected to serve its' principal purpose for at least one year and is less than $1,000 per unit cost in value. Generally, computing devices as defined in 2 CFR §200.20 would be classified in this category.

7. Property Acquisitions/Equipment – An item to be purchased, that is expected to serve its principal purpose for at least one year and is equal or greater to $1,000 per unit cost in value.

8. Other Charges – expenditures that would not fall into one of the other categories. Each potential expenditure classified as other, must be clearly listed and explained.

Each subrecipient's budget documentation must be reviewed for allowability and approved by the subrecipient's Certified Perkins Representative. As noted above, the budget documents must be submitted to the LCTCS as a part of the LAP. The LAP will be reviewed according to the procedure outlined below.

Local Application Plan Review Process

Each year, the LCTCS must review all eligible subrecipients' LAPs to ensure compliance with Perkins V. The process includes providing technical assistance to subrecipients throughout the planning process.

The local application is reviewed by the LCTCS staff. The LCTCS staff will review the LAP, side-by-side with the eligible subrecipients' CLNA. The CLNA must align with the activities, budgets, and projects within the LAP. Funds may only be expended to support the CLNA.

The budget is reviewed by staff in the Finance Division of the LCTCS' Finance and Administration Office, and the Perkins State Director. Each budget will be reviewed to ensure that all line items relate to the improvement of CTE and all items are allowable under Perkins V and EDGAR.

If there are questions or concerns with portions of the LAP, the LCTCS staff will contact the subrecipient's Certified Perkins Representative. (or Perkins V Coordinator when the subrecipient does not have a Certified Perkins V Representative). The LAP review form that contains the reviewer's comments and required changes will be sent via eGrants to the Certified Perkins V Representative. Within a reasonable amount of time, the subrecipient must submit a revised application that addresses the questions/concerns. This process will continue until the LAP is approved.

State Requirements

The LCTCS maintains a set of requirements that subrecipients must adhere to. These requirements will be used by LCTCS to review LAPs and budgets. The LCTCS specific requirements are listed below:

1. The focus of Perkins V is to develop more fully the academic knowledge and technical and employability skills of secondary and postsecondary students enrolled in CTE programs of study.

2. A subrecipient should not continue to spend funds on a specific activity for more than three consecutive years, unless new additions and improvements are continuing to be made to the program.

3. Each year, the LAP will include an updated list of career clusters approved by the Perkins V Regional Coalition supporting high-wage, in-demand, or high-skill occupational areas. The approved programs of study are listed under each cluster. If a subrecipient would like to use funds for a fourth career cluster, the subrecipient must provide justification in the LAP that the program is a high-wage, in-demand, or high-skill occupation in the local workforce investment area that the subrecipient is serving.

4. Subrecipients may spend no more than 50% of their Perkins allocation on equipment. If a subrecipient would like to spend over the 50% threshold, the subrecipient may request a waiver to this rule from the LCTCS (providing justification for the exception). The LCTCS will only grant such a waiver if the equipment sought corresponds to a high-wage, in-demand, or high-skill occupation. Further, only waivers up to 70% may be approved. The subrecipient must receive written approval from the LCTCS for a budget with more than 50% allocated to equipment to be accepted for funding. This rule does not apply to the budget for reserve funds. All equipment in the original grant must be received by December 20th.

5. Subrecipients may not spend more than 50% of their Perkins allocation on salaries and benefits. If a subrecipient allocates over the 50% threshold, the subrecipient may request a wavier to this rule from the LCTCS (providing justification for the exception). The subrecipient must receive prior written approval from the LCTCS for a budget with more than 50% allocated to salaries to be accepted. This rule does not apply to the budget for reserve funds.

Timeline of Review Process

Date/Time of Year	Task
Spring	Pell Grant and WIOA Allocation Data due to the LCTCS. Once the allocations are determined, the Perkins V State Director will send written notification to all eligible subrecipients notifying the institution of its projected allocation for the upcoming fiscal year. Prior to the written notification of projected allocation, eligible subrecipients should continue drafting their LAP based on the previous year's allocation amount.
Spring or early Summer	The eGrants portal will open. Subrecipients may began to enter the documents and required components of the LAP. The LAP must be submitted via eGrants, by 11:59 PM of the deadline date. All components of the submission (local application, improvement plan if applicable, and budget) will be date-stamped by eGrants. At the deadline time, the eGrants portal will close. The eGrant portal will then be inaccessible to the subrecipients. The LCTCS Staff will review each LAP to ensure completeness.
Summer	Review of LAP Submissions by the LCTCS' Staff. The LCTCS staff will review all local applications and improvement plans according to the process expressed within this document. Upon the approval of an application or improvement plan, it will receive an additional date stamp signifying approval. The Perkins V State Director and certified representatives from the Finance Division will review the budget according to the process explained above. Upon the approval of the budget, it will receive an additional date stamp signifying final approval.
July 1st	All LAPs Submissions Approved and Grant Program Year Begins.

Pursuant to EDGAR section 76.708, a subrecipient who has submitted a substantially approvable application, may begin to obligate funds prior to final approval. A LAP is deemed substantially approved if it has minor discrepancies. LCTCS will notify the subrecipient if the LAP is considered substantially approved. All minor discrepancies must be corrected before the LAP receives final approval.

After the subrecipient has received notification that the LAP is substantially approved, the subrecipient may begin to obligate funds. However, the subrecipient's grant award will not be issued by the LCTCS until the LAP has received final approval. Any obligations incurred by a subrecipient that are determined to be outside of the approved budget shall not be reimbursed with Perkins V funds.

Budget Amendment Review Process

Subrecipients may request amendments to the institution's Perkins V budgets throughout the program year. A budget amendment may be necessary when:

- Additional funds are awarded after the original allocation;
- The needs of the subrecipient or a specific program are altered; or
- Needs are modified from those within the originally approved application.

When an institution determines a budget amendment is necessary, the process must be completed through eGrants. The budget amendment must include a description of the POS to be affected and a justification for the amendment.

The justification must specify the reason the amendment is necessary. Unclear or insufficient justifications will result in the amendment being rejected.

- The completed Budget Amendment must be submitted via eGrants by the Primary User. If the amendment is approved, the effective date will be the date the LCTCS Perkins V staff approved the amendment via eGrants.
- It is recommended that an institution does not submit more than one budget amendment per quarter. However, if an unforeseeable need arises, the LCTCS will consider additional amendments.
- The **final budget amendment deadline is May 1st** of the fiscal year. If this date falls on a weekend or holiday, the deadline is the next business day.

Programmatic Fiscal Requirements

Supplement Not Supplant

As a requirement of the Perkins V statute, funds made available under the Act must supplement and not supplant non-Federal funds expended to carry out career and technical education activities. In other words, Federal Perkins V funds may only be used in addition to funds already expended by the State and subrecipients on CTE. Perkins V Federal funds cannot be used in place of non-Perkins funds. In short, a subrecipient may not reduce state, local, or other non-Federal funds previously allocated for an activity simply due to the availability of Federal funds.

It will be presumed that supplanting has occurred when:

- The LCTCS, or one of the subrecipients uses Perkins funds to provide services that the LCTCS, or one of the subrecipients, is required to make available under another Federal, State or local law; or
- The LCTCS, or one of the subrecipients, uses Perkins funds to provide services that the LCTCS, or the subrecipient provided with non-Perkins funds in the prior year; or
- The LCTCS, or one of the subrecipients provides services for non-CTE students with non-Federal funds and provides the same services to CTE students using Perkins funds.

These presumptions are rebuttable if the LCTCS or the subrecipient can demonstrate that it would not have provided the services in question with non-Perkins V funds, had the Perkins V funds not been available. When there is a presumption of supplanting, due to a reduction in non-Federal funds or a change in the State's priorities, the LCTCS and/or the subrecipient will create and maintain supporting written documents. The documents may include meeting minutes or itemized budget documents for one year to the following year. It must demonstrate the decision to not fund an activity with state or local funds was made without regard to the availability of Perkins V funds. If the LCTCS or a subrecipient uses Perkins V funds to support activities that otherwise would be funded with State or local funds, the activities funded must be allowable under Perkins V. All subrecipients must receive prior approval from the Perkins V State Director to use Perkins V funds where non-Perkins V funds had been utilized previously. The prior approval must be maintained by the subrecipient and held on file with all other justification documentation.

Maintenance of Effort

As required by the Perkins V statute, the LCTCS in collaboration with the LDE, must be able to demonstrate the "State's fiscal effort per student, or the aggregate expenditure of such State, with respect to career and technical education for the preceding fiscal year was not less than the current fiscal effort per student, or the aggregate expenditure of such State." (Sec. 211{b}) The calculation may be done on a per-pupil basis (amount spent per CTE student) or on an aggregate basis (the total spent on CTE). Louisiana must maintain 100% of the prior year efforts, unless Louisiana receives a smaller allocation from USDOE. In that case, Louisiana may reduce its efforts proportionally. For Louisiana to continue a sustained maintenance of effort, the current funding distribution of secondary 56% and postsecondary 44% will remain in place for the foreseeable future. The funding split will be subject to potential review no more than annually.

Maintenance of Effort Report

The LCTCS requires all subrecipients to complete a Maintenance of Effort Report each year detailing the amount of State funds used by the subrecipient to support CTE. This report is due to the LCTCS in eGrants by July 31st. If this date falls on a weekend or holiday, the report will be due on the next business day.

Matching

As discussed more fully above, states are authorized under Perkins V to use a certain percentage of their total allocation for administrative activities. However, the state must match, with non-federal funds and on a dollar-for-dollar basis, all Perkins V funds spent on State administration. There is no match on local administration.

Program Income

Program Income is income earned by the non-federal entity, directly generated by a supported activity or earned as a result of the efforts of the federal award during the period of performance. (200.307) Program income includes, but is not limited to:

- Revenue and fees for services performed;
- The use or rental, real, or personal property acquired under Federal awards;
- The sale of commodities or items fabricated under a Federal award; and
- License fees and royalties of patents and copyrights, and principal and interest on loans made with Federal award funds.

The Monitoring Process

The LCTCS as the pass-through agency, is responsible for ensuring that subrecipients comply with all applicable Federal regulations and State requirements. In order to fulfill this obligation, the LCTCS regularly monitors its subrecipients. The LCTCS also provides monitoring services to its subrecipients as a method of providing technical assistance. To support the development of a resilient and capable workforce, technical assistance allows subrecipients to develop a better understanding of local performance, operations, and issues facing special populations. The informal monitoring process may also include the review of:

- LAPs;
- Budget amendments;
- Programmatic and financial reporting; and
- Single audit reports, etc.

The LCTCS' formal and official Perkins V Monitoring Review consists of fiscal and a programmatic review by the LCTCS Perkins V (CTE) staff/monitoring team. The official reviews are conducted during the spring of each year. Pursuant to 2 CFR §200.331 (D1-D3), monitoring includes ensuring that the subrecipient corrects deficiencies pertaining to Perkins V through audits, on-site reviews, and other means. The subrecipients are ranked based upon the following:

- The last date of an on-site monitoring review, or the lack thereof;
- Consistently low performance indicators in several categories;
- Failure to comply with grant compliance or unobligated balances of program funds identified through desk monitoring of the eGrants portal;
- Inconsistent data quality;
- Significant staff turnover;
- Unacceptable or untimely resolution of required actions from prior monitoring visits; and
- Unresolved or recurring audit findings.

The LCTCS staff may conduct additional targeted visits for a subrecipient when it is deemed necessary. Using established selection criteria and desk audit reports, staff will conduct at least one official, on-site review each year. The LCTCS determines its official monitoring schedule based on a risk assessment of all subrecipients. However, all subrecipients will be monitored at least once every six years.

Fiscal Monitoring Review

The purpose of fiscal monitoring is to determine whether transactions were within the guidelines of applicable federal and State regulations. In short, it may include the subrecipient following the LCTCS' more restrictive financial management rules, accurate and current financial reporting, adhering to the established internal controls and ensuring the accuracy of data entered into the eGrants portal. All fiscal requirements may be found in the following:

- Strengthening Career and Technical Education for the 21st Century Act (Perkins V);
- U.S. Code of Federal Regulations-Title 34- Education;
- Office of Management and Budget Circular A-21 "Cost Principles for Educational Institutions";
- Louisiana's Division of Administration Travel Policies and Procedures – to be referred to as hereafter-PPM 49; and
- LCTCS Perkins V Manual (this document).

Programmatic Monitoring Review

The Perkins V Office is responsible for conducting the programmatic review of Perkins V funds. The programmatic review will monitor the required use of funds to support CTE programs that are sufficient in size, scope, and quality to be effective, under Section 135(b):

- Provide career exploration and career development activities through an organized, systematic framework designed to aid students;
- Provide professional development for CTE personnel;
- Provide skills in CTE programs to pursue careers in high-skill, high-wage, or in-demand industry sectors or occupations;
- Support integration of academic skills into CTE programs and programs of study;
- Plan and carry out elements that support CTE programs and programs of study that improve student achievement and performance; and
- Develop and implement evaluations of activities funded to conduct the CLNA.

Note: Subrecipients must maintain evidence to support all LAP objectives/strategies throughout the year.

The LCTCS Pre-Monitoring Procedure

When the subrecipient has been selected for an official Perkins V Monitoring Review:

- The institution's Chancellor or President will be notified in writing;
- A preliminary "save the date" will be issued at least six months prior to the on-site visit;
- The correspondence will include the statutory authority for the review, a brief summary of the process, and a proposed date the review will take place;
- A Pre-Review Conference call will be held to solidify the date of the review and all schedule conflicts, provide details concerning the review process, to hear concerns, and to answer questions of the interested parties.

Note: Unofficial programmatic reviews may be conducted without prior notification.

Monitoring Review

The Perkins V Monitoring Review consists of an on-site monitoring visit and a desk review. The on-site monitoring activities include the following:

- Entrance Conference with Perkins (CTE) Staff/Monitoring Team, Perkins V Representative, and the Campus Dean;
- Classroom Observation;
- Document Review;
- Interviews with Staff;
- Inventory Review; and
- Exit Conference.

The on-site portion of the monitoring review may take two to four business days to complete. The duration of the on-site portion hinges upon the number of campuses, Perkins V allocation amount, the number of CTE programs, and the monitoring plan. The on-site monitoring review will commence upon a brief entrance conference between the monitoring team, the institution's Perkins V Representative, and the Campus Dean at the campus site. When an institution has multiple campuses participating in the monitoring review, a brief entrance conference will be held with the monitoring team, Perkins Representative, and the applicable Campus Dean upon arrival to the campus. In addition, a Perkins V supported course observation will be conducted.
Note: Due to the Covid-19 pandemic the on-site reviews may be delayed and/postponed.

The document review will consist of the following, at a minimum:

- CLNA;
- Enrollment Data;
- Equipment Inventory List;
- Students Served/Demographics;
- Assessment Information/Data Collection Process;
- Program Services/Wrap Around Services;
- Perkins Advertisements;
- Perkins Eligible CTE Programs of Study;
- Professional Development Supporting Documentation;
- Regional Coalition Supporting Documentation; and
- Resources.

The Perkins V Coordinator will receive a detailed documentation request prior to the on-site review taking place. It is at the discretion of the Perkins V Coordinator and institutional staff if the document review will take place at a central location, or at each campus site. The internal logistics for the on-site review is also at the discretion of the Perkins Representative to plan and communicate the plans to the monitoring team prior to arrival.

Exit Conference

The monitoring team will conference with the Perkins V Representative prior to departure. The conference will be informal and provide the Perkins Representative with the next steps of the process. The monitoring report will not be drafted at the time of the conference. An overview of expected findings may be shared.

Monitoring Report

The LCTCS team conducting the monitoring visit will send the subrecipient a written report of findings, and areas of concern within 30 days of the visit. Any issues of concern and/or non-compliance will be noted in the letter. The LCTCS program specialist(s) will work with the institution to determine an appropriate resolution. As a last resort, any unresolved non-compliance issues may result in not approving the CTE program for continued State and Federal financial support.

Follow-Up on Findings and Corrective Actions

The LCTCS team will conduct follow-up monitoring with subrecipients that received Perkins V monitoring findings during the prior fiscal year. The extent of the follow-up audit work is determined by the severity and number of findings. Upon review, it will be determined if the corrective action plan implemented by the subrecipient has been effective. If it is determined that the corrective action plan was successful, no further action will be required. When a subrecipient maintains noncompliance status, the State Perkins V Director will send written notification stating the mandatory technical assistance to be implemented.

The Perkins V Connection to Equity & Methods of Administration (MOA)

All Perkins V subrecipients receiving federal funds must comply with the Office for Civil Rights' (OCR) Methods of Administration requirements. Perkins V heightened the level of civil rights accountability for CTE programs, and the new Perkins V provisions including, but not limited to, the following:

- Adding homeless individuals, foster care youth, and youth with a parent in active military duty;
- Requiring States to make funds available for the recruitment of special populations; and
- Requiring local recipients to conduct a comprehensive local needs assessment, which includes an evaluation of the performance for special populations and subgroups.

OCR's 1979 issued Method of Procedure (MOP) has been updated to better align its operations with Perkins V. The scope and depth of changes that the Perkins V statutes have caused State and local practices to ensure access and success for all students in CTE programs. Therefore, it is fitting that the Department's MOP be updated to reconcile the civil rights work pursuant to both the Perkins V and MOA programs. OCR's MOA program ensures the 1979 Guidelines are upheld and ensures institutions do not discriminate against individuals based on race, color, national origin, sex, and disability status. The MOA program is inclusive of the following legislation:

- The Guidelines for Eliminating Discrimination and Denial of Services based on Race, Color, National Origin, Sex and Handicap in Vocational Education Programs;
- Title VI of the Civil Rights Act of 1964 (34 CFR Part 100);
- Title IX of Education Amendments of 1972 (34 CFR Part 106);
- Section 504 of the Rehabilitation Act of 1973 (34 CFR Part 104); and
- Title II of the Americans with Disabilities Act of 1990 (28 CFR Part 35).

The LCTCS Level Monitoring

The audit of the LCTCS Perkins V Department is generally performed by the LCTCS Internal Audit Office. The LCTCS Perkins V State program activities, allocation model, indirect cost allocation, and the use of leadership and administrative funds are monitored. When the audit is complete, the Internal Audit Office will release report of potential findings and recommendations. If the audit results in severe findings, the LCTCS will complete a corrective action plan to address the issues aggressively.

Fiscal Grants Management & Compliance with EDGAR

The continuation of Perkins V, and other educational legislative change agents, relies upon the proper management of the federal dollars. There are specific federal fiscal grant management regulations, applicable to all grants issued by the USDOE. These requirements may be found in EDGAR. The LCTCS and subrecipients shall comply with the programmatic principles within Perkins V and applicable EDGAR regulations. This section provides the applicable EDGAR requirements and the LCTCS' processes for ensuring compliance is maintained by all subrecipients.

Financial Management System

The financial management system of a subrecipient includes the methodology and software utilized to track expenditures, internal controls, and the overall accounting of grant funds. The financial management system must be efficient and viable to ensure fiscal controls and procedures are cultivated. In short, the subrecipient's financial management system shall ensure all fiscal compliance factors are met. Failure to meet a requirement may result in the return, reduction, and termination of the award. EDGAR at 2 C.F.R. §200.302(1 – 7) contains the standards for financial management systems. The standards include:

1. <u>Identification of Awards</u> - Identification in its accounts, of all Federal awards received and expended and the Federal programs under which they were received. Federal program and Federal award identification must include, as applicable, the CFDA title and number, Federal award identification number and year, name of the Federal agency, and name of the pass-through entity, if any.

2. <u>Financial Reporting</u> - Accurate, current, and complete disclosure of the financial results of each Federal award or program in accordance with the reporting requirements set forth in §200.327 Financial Reporting and §200.328 Monitoring and Reporting Program Performance. If a Federal awarding agency requires reporting on an accrual basis from a subrecipient that maintains its records on other than an accrual basis, the subrecipient must not be required to establish an accrual accounting system. This subrecipient may develop accrual data for its reports based on an analysis of the documentation on hand. Similarly, a pass-through entity must not require a subrecipient to establish an accrual accounting system and must allow the subrecipient to develop accrual data for its reports based on an analysis of the documentation on hand.

3. <u>Accounting Records</u> - Records that adequately identify the source and application of funds for federally funded activities. These records must contain information pertaining to Federal awards, authorizations, obligations, unobligated balances, assets, expenditures, income and interest and be supported by source documentation.

4. <u>Internal Controls</u> - Effective control over, and accountability for, all funds, property, and other assets. The non-Federal entity must adequately safeguard all assets and assure that they are used solely for authorized purposes. See §200.303 Internal Controls.

5. <u>Budget Control</u> - Comparison of expenditures with budget amounts for each Federal award.

6. <u>Allowable Cost</u> - Written procedures to implement the requirements of §200.305 Payment.

7. <u>Source Documentation</u> - Written procedures for determining the allowability of costs in accordance

with Subpart E - Cost Principles of this part and the terms and conditions of the Federal award.

The subrecipient must also adhere to §200.305 Written Cash Management. The subrecipient must implement the requirements of §200.305, and minimize the time elapsing between the transfer of funds from the U.S. Treasury to the LCTCS, and onto the subrecipients. The written procedure must be followed whenever advance payment is utilized. Subrecipients must establish reasonable procedures to ensure the receipt of reports of its cash balances and cash disbursements are completed timely to be transmitted to the awarding agency.

Overview of LCTCS Financial Management/ Accounting System

Starting July 1, 2011, the LCTCS and all subrecipients employed the use of Banner Finance (Banner), as the financial management and accounting system. The LCTCS uses Banner to track expenditures at the state level. Each subrecipient uses Banner to track expenditures of their funds. At the beginning of a grant year, the LCTCS budget is uploaded into the Banner software portal. It assigns each grant and funding source a unique code, so that it can be easily tracked. At the LCTCS, the Finance Department staff is responsible for managing the budget and accounts payable at the state and local level.

LCTCS Budget

Perkins V funds at the state level are tracked by the type of set-aside (State administration, State leadership, pass-through funds, and the reserve), as well as funds which have been carried over from the previous grant year (carryover is discussed in the Timely Obligation section).

After the State Perkins V Director determines the allocations, the allocations are provided to the Grant Accounting Analyst in the Finance Department. The Grant Accounting Analyst then loads the budgets into Banner. Once the budget is loaded, the Grants Accounting Analyst is responsible for ensuring that Perkins V expenditures are properly recorded in Banner. The Director of Fiscal Affairs in the Finance Department is responsible for ensuring that non-federal expenditures are properly recorded and tracks the State matching funds.

All desired expenditures at the state level must be recorded within a Requisition Request and approved by the State Perkins Director. Once the Requisition Request is approved, it is given to the Grant Accounting Analyst. The Grant Accounting Analyst then codes and enters the information from the Requisition Request into Banner.

The Requisition Request is then given to the Procurement Division, where the requested equipment, supplies, or services are procured according to procurement procedures outlined in the Procurement section of this manual. Once the invoice is received by the LCTCS, the Grant Accounting Analyst enters the applicable information from the invoice into Banner. The invoice then goes to the Accounts Payable Analyst in the Finance Department. Louisiana has an Electronic Funds Transfer system (EFT), which allows funds to be electronically transferred from the LCTCS's account to registered vendors accounts. If the vendor is signed up on EFT, the accounts payable analyst will transfer the funds using the EFT system. If not, a check is generated and remitted via mail. The invoice or Requisition Request, along with the EFT or a copy of the check is then given to the Grants Accounting Analyst who files the paperwork in the hard file for that vendor. All financial records and financial documents are completed within the eGrants System and LOLA System. Thus, there are electronic records.

Subrecipients' Budgets

At the LCTCS, the Finance Department administers the payment process for subrecipients. The subrecipients' budgets are loaded onto Banner by the Grant Accounting Analyst as one total amount. Additionally, the Grant Accounting Analyst maintains a separate spreadsheet in Access (a MOS computer program) that details each subrecipient's budget by line item. Subrecipients keep track of their own budget using a Banner Finance system. However, the subrecipients' finance system does not currently interface with the LCTCS' Banner finance process. Accordingly, each subrecipient is responsible for ensuring that the budget is updated as budget revisions are approved, and payments are made.

The LCTCS distributes funds based on a 100% reimbursement system. It requires subrecipients to first obligate funds. After the funds are expended, subrecipients must complete the LCTCS' reimbursement process. Upon the approval of the reimbursement process, the grant funds will be remitted to the subrecipient.

Grant Revisions

A Grant Revision is an "add on" to original supporting documentation. New documentation should not be submitted in a revision, unless there were no expenditures in the category in the original budget. Grant revisions are acceptable if the revision is in support of the originally approved LAP. Grant revisions are acceptable in all categories of the budget. The LCTCS fiscal staff receives and approves or disapproves the revision. Upon the approval of the grant revision by the LCTCS' fiscal staff, it advances within the eGrant portal to the Perkins program staff. If the grant revision is disapproved, a notification of return will be received by the subrecipient via the eGrants portal.

Salaries of Administrative and Clerical Staff

The salaries of administrators and clerical staff should normally be treated as indirect costs (Refer to 2 C.F.R. §200.413(c) for more information). Direct charging of these costs may be appropriate only if **all** the following conditions are met:

1. Administrative or clerical services are integral to a project or activity;
2. Individuals involved can be specifically identified with the project or activity;
3. Such costs are explicitly included in the budget or have the prior written approval of the Federal awarding agency; and
4. The costs are not also recovered as indirect costs.

Basic Cost Principles

Allowable Costs

2 C.F.R. Part §200 Subpart E establishes federal cost principles for all nonfederal entities. The cost principles are the basic guidelines describing the permissible ways federal funds may be spent. The general principles state that for costs to be allowable, the cost must be necessary, reasonable, and allocable. The cost must meet the following general criteria:

- Conform to Federal law and Perkins V terms;
- Consistent with State and Local policies;
- Consistent treatment;
- In accordance with Generally Accepted Accounting Principles (GAAP);
- Not utilized as match;
- Sufficiently documented; and
- Be the net of applicable credits.

Applicable Credits §200.406

Applicable credits are applied purchase discounts, rebates or allowances, recoveries or indemnities on losses, insurance refunds or rebates, and adjustments of overpayments or erroneous charges that must be credited to the Federal award. To the extent that such credits accruing to or received by the State relate to the federal award, they shall be credited to the federal award, either as a cost reduction or cash refund, as appropriate.

Reasonable §200.404

When a subrecipient determines if a cost is reasonable, consideration must be given to:

1. Whether cost is a type generally recognized as ordinary and necessary for the operation of the non-Federal entity or the proper and efficient performance of the Federal award;
2. Sound business practices must be present, and consider Federal, State, Local, Tribal, and other law or regulations, and the Perkins V conditions and terms;
3. Market prices in the geographic area were comparable for goods and/or services;
4. Whether the individuals involved acted with prudence; and
5. Whether entity deviates from established financial practices or policies.

General Provisions for Selected Items of Cost

Considerations for selected items are commonly referred to as Selected Items of Cost at 2 C.F.R. §200.420 – §200.475. It provides principles to be applied in determining cost and examines the allowability. These principles apply whether an item of cost is properly treated as direct cost or indirect (F&A) cost. Failure to mention an item of cost is not intended to imply that it is either allowable or unallowable; rather, determination as to allowability in each case should be based on the treatment provided for similar or related items of cost (refer to the principles described in §200.402 through §200.411). Staff must check all costs against these requirements to ensure the cost is allowable. The items of cost addressed in Part 200 includes the following:

Item of Cost	Citation of Allowability Rule
Advertising and public relations costs	2 CFR §200.421
Advisory councils	2 CFR §200.422
Alcoholic beverages	2 CFR §200.423
Alumni/ae activities	2 CFR §200.424
Audit services	2 CFR §200.425
Bad debts	2 CFR §200.426
Bonding costs	2 CFR §200.427

Collection of improper payments	2 CFR §200.428
Commencement and convocation costs	2 CFR §200.429
Compensation – personal services	2 CFR §200.430
Compensation – fringe benefits	2 CFR §200.431
Conferences	2 CFR §200.432
Contingency provisions	2 CFR §200.433
Contributions and donations	2 CFR §200.434
Defense and prosecution of criminal and civil proceedings, claims, appeals and patent infringements	2 CFR §200.435
Depreciation	2 CFR §200.436
Employee health and welfare costs	2 CFR §200.437
Entertainment costs	2 CFR §200.438
Equipment and other capital expenditures	2 CFR §200.439
Exchange rates	2 CFR §200.440
Fines, penalties, damages and other Settlements	2 CFR §200.441
Fund raising and investment management costs	2 CFR §200.442
Gains and losses on disposition of depreciable assets	2 CFR §200.443
General costs of government	2 CFR §200.444
Goods and services for personal use	2 CFR §200.445
Idle facilities and idle capacity	2 CFR §200.446
Insurance and indemnification	2 CFR §200.447
Intellectual property	2 CFR §200.448
Interest	2 CFR §200.449
Lobbying	2 CFR §200.450
Losses on other awards or contracts	2 CFR §200.451
Maintenance and repair costs	2 CFR §200.452
Materials and supplies costs, including costs of computing devices	2 CFR §200.453
Memberships, subscription, and professional activity cost	2 CFR §200.454
Organization costs	2 CFR §200.455
Participant support costs	2 CFR §200.456
Plant and security costs	2 CFR §200.457
Pre-award costs	2 CFR §200.458
Professional services costs	2 CFR §200.459
Proposal costs	2 CFR §200.460
Publication and printing costs	2 CFR §200.461
Rearrangement and reconversion costs	2 CFR §200.462
Recruiting costs	2 CFR §200.463
Relocation costs of employees	2 CFR §200.464

Rental costs of real property and Equipment	2 CFR §200.465
Scholarships and student aid costs	2 CFR §200.466
Selling and marketing costs	2 CFR §200.467
Specialized service facilities	2 CFR §200.468
Student activity costs	2 CFR §200.469
Taxes (including Value Added Tax)	2 CFR §200.470
Termination costs	2 CFR §200.471
Training and education costs	2 CFR §200.472
Transportation costs	2 CFR §200.473
Travel costs	2 CFR §200.474
Trustees	2 CFR §200.475

§200.407 Prior Written Approval

Under any given Federal award, the reasonableness and allocability of certain items of costs may be difficult to determine. In order to avoid subsequent disallowance or dispute based on unreasonableness or non-allocability, the subrecipient may seek the prior written approval of the awarding agency in advance of the incurrence of special or unusual costs. In addition to the allowable costs, the state may have certain policies and procedures that are stricter than the federal awards requirements that must be adhered to for a cost to be allowable. Subrecipients should consult both state and federal guidelines and follow the stricter version of the two. Several cost items that the LCTCS employees and subrecipients should be aware of include:

1. Accommodations for Individuals with Disabilities;
2. Career and Technical Student Organizations;
3. Interpreting Services and Equipment;
4. Outreach;
5. Professional Development; and
6. Travel and Transportation.

These cost items are discussed below.

Accommodations for Individuals with Disabilities

Any subrecipient receiving Federal funds may not exclude an otherwise qualified individual with a disability from the participation in, deny the benefits of, or cause the person to be subjected to discrimination under any program or activity based on the individual's disability. See Section 504 of the Vocational Rehabilitation Act of 1973, 29 U.S.C. 794. Subrecipients must make modifications to academic requirements as necessary to ensure that such requirements do not discriminate, or have the effect of discriminating, based on a disability against an otherwise qualified applicant or student with a disability.

There are two laws that require subrecipients to provide accommodations, modifications, or auxiliary aids to otherwise qualified students: Section 504 of the Vocational Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990 (ADA). Students who need accommodations are responsible for requesting these services and for meeting with the Disability Services Office or Coordinator at their institution to:

1. Provide documentation that supports the request for services; and
2. Discuss the nature of the request, the nature of their disabilities, and past experiences.

The Disability Services professional at the institution will recommend a reasonable accommodation that will be the most effective in assuring the student's access to academic programs.

Subrecipients should budget funds to ensure various accommodations are available for students with disabilities. These expenditures can be funded from the Institution's State/local, Perkins V or self- generated budgets. Section 324(c) of Perkins V provides that the state or eligible subrecipient may use Perkins V funds to pay for the cost of CTE services necessary to meet the requirements of Section 504 of the Rehabilitation Act of 1973 with respect to ensuring equal access to career and technical education. For materials, guidance, and more information relating to individuals with disabilities and accommodations, contact the LCTCS Director of Student Affairs.

Career and Technical Student Organizations (CTSOs)

Perkins V funds may be used for activities involving CTSOs if such activities have been addressed in the LAP, CLNA, and budget. Under Perkins V, CTSOs may use funds to "support CTSOs, including student preparation for a participation in technical skills competitions aligned with career and technical education program standards and curricula". (Section 135{b}{5}) The permissible activities must be in alignment with the CLNA and be in the subrecipients' LAP. Keep in mind that Perkins V funds may supplement, but not supplant non-Federal funds to carry out CTE activities. It will be presumed that supplanting has occurred when the subrecipient provides services or stipends with non-Federal funds and provides the same services or stipends using Perkins V funds.

Interpreting Services and Equipment

One of the most critical components for any program for deaf and hard of hearing students is interpreting services and equipment. See Accommodations for Individuals with Disabilities above for more information. The Disability Services professional at the student's institution will recommend the accommodation(s) which will be most effective in assuring the student's access to academic programs.

Most often, an interpreter is situated in the front of the classroom and near the instructor to allow the student to have both the interpreter and instructor in their field of vision to enhance visual cues. Some programs utilize part-time interpreters on a contract basis depending on the need for interpreting services. Other programs have a full-time interpreter on staff. Still others utilize both full-time and part-time interpreters. This varies with the number of deaf students enrolled. The extent and skill of interpreting services needed for each student is dependent on enrollment and curriculum requirements, such as whether it is a lecture class or a lab. Perkins V funds may supplement, but not supplant non-federal funds to provide services. It will be presumed that supplanting has occurred when the subrecipient provides services with non-Federal funds and provides the same services using Perkins V funds to CTE students.

The Americans with Disabilities Act of 1990:

When an interpreter is required, the public accommodation should provide a qualified interpreter. The interpreter must be able to sign what is being relayed by the speaker to the individual who is deaf. Additionally, the interpreter must be able to relay to the speaker information from the individual who is deaf. This communication must be conveyed effectively, accurately, and impartially, using any necessary specialized vocabulary.

Being able to interpret effectively, accurately, impartially, receptively, and expressively determines whether one is qualified, not whether he or she is certified by an official licensing body. An individual does not have to be certified in order to meet this standard.

Interpreters are to be paid an hourly rate according to the most recent pay plan established by the Louisiana Commission for the Deaf, which indicates an hourly pay rate according to the interpreter's level of certification. Postsecondary institutions should budget funds to ensure interpreters are available for deaf students. These expenditures can be funded from the institution's State/local, Perkins V, or self-generated budgets. **All service contracts by subrecipients must be reviewed by the LCTCS if paid with Perkins V funds.** See the *Procurement* section of this manual for more information on service contracts.

Outreach (Advertising and Public Relations)

Advertisements are allowable for recruiting grant personnel and to promote CTE programs. **Perkins V funds cannot be used to promote the institution itself.** Funds can be used for informational brochures, magazines, newspapers, television, or radio advertisements —***only if***— it directly supports a specific CTE program/service.

Note: The LCTCS requires submission of sample outreach/marketing materials prior to budget approval for the specific expenditures.

Public Relations costs may be allocable when:

1. Specifically required by the Federal award;
2. Cost of communicating with the public and press; and
3. Conducting general liaison with news media and government public relations officers.

Professional Development

Perkins V heightens the importance of professional development. The LCTCS seeks to strengthen Louisiana's CTE network by ensuring stakeholders are knowledgeable of the services offered in the various regions. The LCTCS has provided a strategic professional development plan for the PRCCs. The PRCCs will work with eligible subrecipients and participate in trainings to develop a working knowledge of the LWC American Job Center's wrap around services.

Professional development may include in-services, conferences, courses, etc. (§200.427) All service contracts entered by subrecipients must be reviewed by the LCTCS. See the *Procurement* section of this manual for more information on service contracts.

Travel and Transportation

Conferences §200.432

A conference is defined as a meeting, seminar, workshop, or event for the purpose of disseminating technical information beyond the non-federal entity and is necessary and reasonable for successful performance under the federal award. Allowable conference costs paid by the non-Federal entity as a host of the conference may include rental of facilities, speaker fees, and/or identifying local (not providing) available dependent-care resources.

Conference hosts must exercise discretion ensuring costs are appropriate, necessary, and managed in a manner that minimize costs to federal award.

Travel Costs §200.474 – Allowable with Certain Restrictions

- Travel costs may be charged on actual, per diem, or mileage basis;
- Travel charges must be reasonable and consistent with entity's written travel reimbursement policies;
- Subrecipients must retain documentation that participation of individuals in conference is necessary for the project; and
- Dependent care costs above and beyond regular dependent care that directly result from travel to conferences may be allowable (consistent with written policy).

Travel and transportation costs for the LCTCS and subrecipient employees are an allowable expenditure, if it will be of documentable benefit to CTE programs. For the allowability of travel or transportation costs for students, please see *Direct Assistance to Special Populations and Career and Technical Student Organizations*. Travel may include the cost of attendance at in-service training activities (professional development). The subrecipient must document expenditures directly linked to the improvement of the CTE program being assisted under Perkins V.

Subrecipients must submit an in-state and out-of-state travel plan with the LAP. The Perkins Coordinator and the Certified Perkins Representative must approve and sign all travel. Additionally, the institution's travel regulations must be followed. The LCTCS employees or subrecipient employees with no Certified Perkins Representative, must have the State Perkins V Director approve and sign all travel. Additionally, a copy of the conference agenda must be attached to all Requests for Reimbursement of travel. General information regarding allowable travel and reimbursement expenses is contained below. For more detailed information, please see the current Louisiana State Travel Guide (PPM49), available at: http://www.doa.la.gov/Pages/osp/Travel/Index.aspx.

Administrative Travel

The term administrator includes campus administrators (campus dean, assistant campus dean, and associate campus dean), chancellor, regional director, chief financial officer, chief business officer, president, and vice president. All Perkins V funded travel by a college administrator must come out of the local administrative set-aside of no more than 5%. The administrative travel **must directly support CTE programs.**

Single Day Travel

Generally, meals are not eligible for reimbursement on single day travel. For additional information refer to the Louisiana's Division of Administration Travel Policies and Procedures – PPM 49.

Travel with Overnight Stay

Conference

Employees may be reimbursed for meals and lodging. Reimbursement for lodging is allowable at the conference hotel, or prior approved alternative hotel. The Louisiana State Travel Guide hotel cost limits must be utilized. The cost of lodging may only exceed guidelines when the hotel is the hosting lodge. Lodging expenses include:

- The cost of travel from an alternate hotel to a conference hotel;
- Baggage and airfare;
- Meals not included in the cost of the conference; and
- Transportation cost from the airport to the conference venue.

LCTCS college staff must entirely travel requests and expenses through Chrome River. The request will go through the approval process and be reviewed by the selected responsible parties. The responsible parties will approve or reject the reports based upon the Louisiana Travel Guide approved standards.

Routine Travel

Refer to the Louisiana's Division of Administration Travel Policies and Procedures – PPM 49 for specific allowances for overnight travel.

Out-of-State Travel

All out-of-State travel must follow the Louisiana's Division of Administration Travel Policies and Procedures – PPM 49. The employee requesting travel must complete the required forms from their institution. Travel forms must be submitted to the appropriate approving authority and approved at least 30 days in advance of the travel.

Vehicular Travel

For official in-State business travel, employees should utilize a State or institutional vehicle when available. When not available, employees may rent a car from Enterprise Rent-A-Car State Motor Pool Rental Contract.

Note: Prior approval is required to rent a vehicle. If the employee elects to use his or her own vehicle, reimbursement may not exceed the maximum number of miles as specified in the most recent version of the Louisiana's Division of Administration Travel Policies and Procedures – PPM 49.

Mileage shall be reimbursable based on the rate noted in the Louisiana's Division of Administration Travel Policies and Procedures – PPM 49.

Note: All subrecipients are responsible for maintaining supporting travel documentation for monitoring purposes.

Timely Obligation of Funds

Obligation

An obligation occurs when funds are formally designated for a specific cost. The following table illustrates when funds are determined to be obligated under federal regulations.

If the obligation is for:	**The obligation is made:**
Acquisition of property	On the date which the subrecipients make a binding written commitment to acquire the property
Personal services by an employee of the subrecipient	When the services are performed
Personal services by a contractor who is not an employee of the subrecipient	On the date which the subrecipients make a binding written commitment to obtain the services
Performance of work other than personal services	On the date which the subrecipients make a binding written commitment to obtain the work
Public utility services	When the subrecipients receive the services
Travel	When the travel is taken
Pre-agreement costs that were preapproved by the Secretary under the cost principles in EDGAR	On the first day of the grant or sub grant performance period

Period of Performance for Federal Funds

All obligations must occur on, or between the beginning and ending dates of the grant project. *See* EDGAR at 2 C.F.R. §200.309 (Period of Performance). Funds should be expended within the fiscal year that the grant funds were appropriated. Subrecipients have a twelve-month obligation for Perkins V funds. However, the LCTCS has 27 months, extending from July 1 of the fiscal year for which the funds were appropriated through September 30 of the second following fiscal year. This maximum period includes a 15-month period of initial availability, plus a 12-month period for carryover. For example, funds from the fiscal year 2015 appropriation initially became available on July 1, 2015 and may be obligated by the LCTCS through September 30, 2017. Any funds not obligated during the period of availability will lapse and must be returned to USDOE.

The obligation period for eligible subrecipients extends from July 1 to the following June 30. **All items must be received and invoiced by June 30. Final reimbursements must be received by the LCTCS by July 15 of the new fiscal year.** Any funds not obligated or liquidated within the specified time frame must be returned to the LCTCS.

Procurement

In accordance with Louisiana law, all purchases made by the LCTCS or any of the subrecipients must conform to all purchasing laws and all purchasing rules of procedure. There are two categories of procurement policies:

purchases of goods and service contracts. The policies and procedures governing procurement under both categories depends on the amount of the purchase or contract. Basic information on these policies is outlined below. Detailed information on procurement can be obtained on the Louisiana Division of Administration (DOA), Office of State Procurement at http://www.doa.la.gov/Pages/osp/Index.aspx. Other grantees and subrecipients must follow policies and procedures that meet the standards set out in EDGAR at 2 C.F.R. §200.318 through §200.326. All nonfederal entities must have documented procurement procedures which reflect applicable federal, state, and local laws and regulations.

Note: The Perkins State Director must give prior approval for all contracts entered by subrecipients.

Vendor Selection Process §200.320

Method of Procurement: Micro purchase; Small purchase procedures; Competitive sealed bids; Competitive proposals; Noncompetitive proposals.

Micro Purchases – Acquisition of supplies and services under $3000 or less; may be awarded without soliciting competitive quotations if nonfederal entity considers the cost reasonable; to the extent practicable must distribute micro-purchased equitable among qualified suppliers.

Noncompetitive Proposals – Appropriate when, the goods or services are available from a single source only; there is a public emergency; the awarding agency authorizes; The Federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to a written request from the non-Federal entity; or after solicitation of a number of sources, competition is determined inadequate after soliciting a number of sources, competition is deemed inadequate (§200.320(f)).

Conflict of Interest Policy

The LCTCS utilizes Policy #6.025, approved by the Board, with an effective date of April 10, 2002. Refer to http://www.lctcs.edu/assets/docs/FinanceAndAdministration/6.025.pdf for the full policy.

Purchase of Goods

The type of purchase procedures required depends on the cost of the item(s) being purchased. The threshold amounts listed below are valid as of June 2020. However, subrecipients should consult the DOA for the most up-to-date information.

Small purchase less than $5000	No competitive bidding is required but is recommended.
Small purchase greater than $5000 but less than $15,000	Three quotations by telephone, email, or fax
Small purchase between $15,000 and less than $25,00	Agency obtains facsimile or written quotations (if within their delegated authority) from at least 5 bona fide qualified bidders
Purchase greater than $25,000	The agency shall host a competitive sealed bid per RS 39.1594.B; Rules & Regulations Section 5

Service Contracts

There are different types of service contracts.

Consulting – As stated in the Louisiana Revised Statue (RS 39:19556(10)(a)(b))

a) "Consulting service" means work, other than professional, personal, or social service, rendered by either individuals or firms who possess specialized knowledge, experience, and expertise to investigate assigned problems or projects and to provide counsel, review, design, development, analysis, or advice in formulating or implementing programs or services, or improvements in programs or services, including but not limited to such areas as management, personnel, finance, accounting, planning, information technology, and advertising contracts, except for printing associated therewith.

(b) The term "consulting service" includes the procurement of supplies and services by a contractor without the necessity of complying with provisions of the Louisiana Procurement Code when such supplies and services are either for insurance procured directly by a licensed insurance producer pursuant to R.S. 39:1540(B), or are merely ancillary to the provision of consulting services under a contingency fee arrangement, even though the procurement of such supplies or services directly by a governmental body would require compliance with the Louisiana Procurement Code. Supplies or services ancillary to the provision of consulting services are those supplies or services which assist the contractor in fulfilling the objective of his contract when the cost for such supplies and services is less than the cost of providing consulting services, as determined by the using agency.

- Most Restrictive - Requires a Request for Proposal (RFP) or sole source justification for contracts of $50,000 and over; and
- Data processing consulting services; and RFPs and subsequent contracts for more than $100,000 require the review of the Procurement Support Team.

Interagency/Intergovernmental – Interagency contracts between governmental entities as defined in R.S. 39:1484(23) for any of the services that fall under personal, professional, consulting, or social service shall be governed by these regulations, except that contracts between boards of higher education and their respective institutions shall be exempt.

Personal – Services that require use of creative or artistic skills including but not limited to, graphic artists, sculptors, musicians, photographers, and writers, or which requires use of highly technical or unique individual skills or talents, including, but not limited to therapists, handwriting analysts, foreign representatives, and expert witnesses for adjudications or other court proceedings.

Professional & Technical Services – Services provided by a consultant to accomplish a specific study, project, task, other work statement or services which, by their nature, can be performed only by persons or firms with specialized skills and knowledge. Costs of professional and consultant services rendered by persons who are members of a profession or possess a special skill are allowable, when reasonable and necessary and when not contingent upon recovery of the costs from the federal funding. While a product may or may not result from the transition, the primary reason for the purchase is the service provided.

Social Service – Rendered by a person, firm, corporation, organization, governmental body, or governmental entity in furtherance of the general welfare of the citizens of Louisiana, including but not limited to the following objectives: Rehabilitation and health support, Habilitation and socialization, Protection for adults and children, Improvement of living conditions and Health, Evaluation, Testing, and Remedial Educational Services for exceptional handicapped or learning disabled nonpublic school students.

The type of service contract procedure required depends on the amount of the contract. All service contracts entered by subrecipients must be reviewed by the Perkins V State Director. In addition, the thresholds below indicate any additional required approvals.

Property Management

Property Classifications

There are three classifications of property:

<u>Equipment</u>: An item is defined as equipment if it can be expected to serve its principal purpose for at least one year and is equal or greater to $1,000 per unit cost in value.

<u>Non-Consumable Supplies</u>: An item is defined as a non-consumable supply if it can be expected to serve its principal purpose for at least one year and is less than $1,000 per unit cost in value (e.g., printers, cameras, iPods, cell phones). Anything that is not equipment is considered supplies "Significant Technological Devices" §200.94. <u>New Computing Devices</u> – Machines used to acquire, store, analyze, and process public data and other information electronically. This includes accessories for printing transmitting and receiving or storing electronic information; **Computing Devices are non-consumable supplies if less than $5000 under EDGAR Guidelines – However, State Guidelines are more restrictive, therefore computing devices under $1000 will be identified as non-consumables.**

<u>Consumable Supplies</u>: An item is defined as a consumable supply if it cannot be expected to serve its principal purpose for at least one year and is less than $1,000 per unit cost in value (e.g., paper, pencils, and instructional material). Generally, at the local level, office supplies are not considered allowable purchases, unless associated with a workshop, conference, or a professional development activity, or when necessary for the operation of equipment purchased with Perkins funds.
Note: All equipment and non-consumable supplies must be inventoried and tagged upon receipt with fiscal year purchased as well as the funding source.

Inventory

Inventory Procedure

Property purchased with administrative or leadership Perkins V funds by the LCTCS is received by the Controller in the Finance and Administration Office. Property purchased with Perkins V funds at the local level is received by the subrecipient's Receiving Department or Property Manager. All subrecipients must have a staff member designated as a Property Manager. When the property is received, it must be inspected to make sure it is in good condition. It should be confirmed with the information on the purchase order or invoice. Next, the following information must be recorded in Banner: description of the property, the source of the property, who holds the title, the acquisition date, the cost of the property, the percentage of Perkins V participation in the cost of the property, the location, the use and condition of the property, and the custodian of the property. The same information must be entered in the Louisiana State assessment management system. Next, the item must be tagged, identifying that the item is a State asset purchased in whole or in part with Perkins V funds. All items valued at $1,000 and those that are easily removable (pilferable) must be tagged. If it is impractical to place a "tag" on an item, smaller labels, etching, or permanent markers may be used. Please consult with the Perkins

Staff, if you have any questions. All assets must be entered into the State's inventory system within 60 days of receipt.

Note: All equipment and non-consumable supplies must include the fiscal year of purchase and must state the funding source either on a tag or written on the item.

Employees of the LCTCS are assigned property for which they are accountable. Each employee must maintain an inventory list of the property for which they are the custodian.

If the property must be configured and/or installed, a member of the LCTCS' Controllers Office will deliver the property to the Information Technology Department (IT). The IT Department will properly program and onboard the product to be sent to or installed for the custodian. If the property does not have to be configured or installed, the property will be delivered to the custodian or the custodian will be notified to retrieve the property.

All subrecipients must maintain a master inventory list for all property purchased with Perkins V funds. The Perkins Coordinator or designated personnel for the subrecipient must possess the master inventory list. He or she will be responsible for verifying the accuracy and completeness of the list. For consortiums, the Perkins Coordinator or other designated personnel must be assigned by the fiscal agent of the consortium.

Annual Inventory

An inventory of all equipment and non-consumable supplies purchased, in whole or in part, with Perkins V funds must be conducted on a yearly basis by both the LCTCS and all subrecipients.

During the annual inventory period, each employee must certify all property listed on their personal asset list; the list must be delivered to the Controller. The Controller and staff will compare the certified asset lists with the master inventory list to determine if any discrepancies exist. At least once every two years the Controller and staff will request that custodians bring in all property so the Controller and staff can physically account for the property. During the annual inventory period, all assets are accounted for either by the certified assets lists or by physical inspection by the Controller and staff.

Both the LCTCS and the subrecipient must submit an annual certification of all inventoried property to the Louisiana Property Assistance Agency (LPAA).

Lost or Stolen Items

All items that the LCTCS staff or subrecipient employees believe may be lost or stolen must be reported to the Controller (the LCTCS) or subrecipient's property manager. While only potentially stolen property must be reported to the police, the Controller at the LCTCS usually files a police report for all stolen and lost items. The Controller or Property Manager must then notify the Internal Audit Director of the lost or stolen property and forward the police report, if available. The Internal Audit Director then reports the stolen or lost item to the District Attorney and the Legislative Auditor. If there is evidence that the item was in fact stolen, the item may be removed from the inventory. If the item is lost, it shall be noted within the master inventory list. An item must stay on the master inventory list for a minimum of 3 years.

Disposal/Transfer Procedure

Use and Dispositions §200.313

According to EDGAR §200.313(c), Equipment must be used by the non-Federal entity in the program or project for which it was acquired as long as needed, whether or not the project or program continues to be supported by the federal award, and the non-federal entity must not encumber the property without prior approval of the Federal awarding agency. When no longer needed for the original program or project, the equipment may be used in other activities supported by the federal awarding agency, in the following order of priority:

- Activities under a federal award from the federal awarding agency which funded the original program or project, then
- Activities under federal awards from other federal awarding agencies. This includes consolidated equipment for information technology systems.

During the time the equipment is used on the project or program for which it was acquired, the non-Federal entity must also make equipment available for use on other projects or programs currently or previously supported by the federal government, provided that such use will not interfere with the work on the projects or program for which it was original required.

EDGAR §200.313 further states that items of equipment with a current per-unit fair market value of less than $5,000 may be retained, sold, or otherwise disposed of with no further obligation to the awarding agency.

The LCTCS: When it is determined that equipment or a non-consumable supply, purchased with Perkins V funds is no longer needed for the intent for which it was originally purchased, the LCTCS must be contacted. The LCTCS will confirm the property can still be used. Then, the LCTCS will survey subrecipients to determine if any subrecipient would be able to use the property. If a subrecipient responded that it would be able to use the property, the Controller or staff must enter the LPAA asset management system and request the transfer of property. LPAA will approve or disapprove the request. If the request if approved, the item can be transferred to the subrecipient by the most reasonable method. Once received by the subrecipient, the subrecipient's property manager should follow the procedures set out above. If denied, the LCTCS must keep the property on their inventory.

Subrecipients: When a subrecipient determines that a piece of equipment or non-consumable supply is no longer needed for the intent for which it was purchased, and the property can still be used, the subrecipient should survey ongoing CTE programs being administered in the local area to determine if there is any need for the available equipment (secondary and postsecondary). If no local programs can use the equipment, a similar survey should be conducted Statewide (postsecondary). If no program responds, the equipment may be transferred for use in another federal program. If the subrecipient gets a response that another program or institution would be able to use the property, the Property Manager must enter the LPAA asset management system and request the transfer of property. LPAA will approve or disapprove the request. If the request is approved, the item can be transferred by the most reasonable method. Once received by the new subrecipient, the subrecipient's property manager should follow the procedures set out above. If denied, the original subrecipient must keep the property on their inventory. See note below.

If the property can no longer be used, or a transfer has been denied, the property may be disposed of or scrapped for parts. Whether the item is to be disposed of or dismantled, the Controller or Property Manager must enter LPAA's asset management system and submit a request. Once LPAA approves the request, the property may be scrapped for parts or disposed of.

Whether the property is transferred, dismantled for parts, or disposed of, the outcome must be entered in the LCTCS' or the subrecipient's inventory system and the State's asset management system.
Note: Each subrecipient must have a written policy for equipment transfer or disposal based on the federal requirements of the grant.

Record Keeping

The LCTCS and all subrecipients must maintain records and accounts in a manner that ensures grant compliance is sufficiency evidenced. These records and accounts must be retained and made available for programmatic or financial audit. The LCTCS is more restrictive than the federal regulation and requires records be retained for a minimum of 5 years from the date on which the final Financial Status Report is submitted. *See* EDGAR at 2 C.F.R. §200.333.

Methods for Collection, Transmission and Storage of Information §200.335

When original records are electronic and cannot be altered, there is no need to create and retain paper copies. When original records are paper, electronic versions may be substituted through the use of duplication or other forms of electronic media provided they are subject to periodic quality control reviews, provide reasonable safeguards against alteration, and remain readable.

Payroll and Time Distribution

The LCTCS employees who spend 100% of their time on one cost objective, may complete a semi-annual certification. Employees who work on two or more cost objectives (i.e. administration and leadership) are required to complete a monthly time and effort report. All Time and Effort (T&E) reports must:

- Reflect an after-the-fact distribution of the actual activity of the employee;
- Account for the total activity for which the employee is compensated;
- Coincide with pay periods either monthly or semiannually (as described above); and
- Be signed by the employee and supervisor. *See* OMB Circular A-87, Appendix B (8)(h)(5).

Each month, after the T&E report is completed and signed, the report should be given to the Finance Office. The LCTCS has implemented an electronic certification process.

Subrecipient Perkins V paid employees are required to complete T&E reports. Time and effort reports must:

- Reflect an after-the-fact distribution of the actual activity of the employee;
- Account for the total activity for which the employee is compensated;
- Be prepared at least monthly if employee works on more than one cost objective or
    - semi-annually if employee works on a single cost objective;
- Coincide with pay periods; and
- Be signed by the employee and supervisor (after the fact). *See* OMB Circular A-21 (J)(10).

Note: If an employee spends time on more than one cost objective, the employee must track time for each cost objective separately. For audit purposes, the subrecipient's Fiscal Agent must maintain the completed and certified copy on file. If the certification process was completed electronically, it is a best practice for the electronic chain of command/authorizations to be attached.

Appendix 1 – Strengthening Career & Technical Education for the 21st Century Act

The full text for the "Strengthening Career & Technical Education for the 21st Century Act" may be reviewed at the link below.

https://www.congress.gov/115/plaws/publ224/PLAW-115publ224.pdf

Appendix 2 – Louisiana Perkins V: Comprehensive Local Needs Assessment Guidebook

Louisiana Community and Technical College System December 2018

Introduction

One of the most significant changes in Perkins V Strengthening Career and Technical Education (CTE) for the 21st Century Act is the new requirement for local applicants to conduct a Comprehensive Local Needs Assessment (CLNA) and update it at least every two years.

The new CLNA is designed as the foundation of Perkins V implementation at the local level. It drives your local application development and future spending decisions. Also, it is an opportunity to take an in-depth look at your entire local and regional CTE system and identify areas where targeted improvements can lead to increased opportunities for student success. The needs assessment, if implemented thoughtfully, can also be a powerful opportunity to engage stakeholders in a common understanding and vision for the future of CTE in your community.[1]

The comprehensive local needs assessment presents an unprecedented opportunity to:

- Create programs and opportunities to ensure access and success for each student that lead to high-wage, high-skill, and in-demand occupations;
- Ensure programs of study are aligned to and validated by local workforce needs and economic priorities;
- Set strategic short- and long-term goals and priorities to ensure coordinated program review and improvement processes; and
- Regularly engage in conversation with stakeholders around the quality and impact of local CTE programs and systems.

This guidebook is intended to give Perkins V applicants a framework from which to structure their approach to the regional and local needs assessment efforts by translating the legal language into actionable steps that not only completes the requirements, but also engages stakeholders in thoughtful program improvement. The guidebook is divided into the following sections:

- Introduction
- First Things First – Stakeholder Engagement
- Section One: Needs Assessment Framework
    - ✦ Part A: Evaluation of Student Performance
    - ✦ Part B: Evaluation of Program Quality
- Size, Scope, and Quality
- Labor Market Alignment
    - ✦ Part C: Evaluation of CTE Programs and Programs of Study

[1] Maximizing Perkins V's Comprehensive Needs Assessment & Local Application to Drive CTE Program Quality and Equity. Association for Career and Technical Education. Updated October 31, 2018.

    - ✦ Part D: Evaluation of Recruitment, Retention, and Training of CTE Educators
    - ✦ Part E: Evaluation of Improving Equity and Access
- Section Two: Discussing and Recording Your Findings
    - ✦ CLNA Worksheets
- Section Three: Merging Findings and Setting Priorities
- Section Four: Getting Ready for the Local Application
- Appendixes

This guidebook has been created with a hefty assist from our national partners at Advance CTE and ACTE. We have borrowed liberally from their guidance documents. Anyone engaged in this process is encouraged to consult their work and other resources cited in Appendix A. Finally, a huge acknowledgement of the guidance provided by our Louisiana Perkins V Core Implementation Team. This stakeholder group has been meeting to provide guidance and assist in setting priorities for our state.

First Things First – Stakeholder Engagement

The comprehensive local needs assessment under Perkins V requires consultation with a variety of stakeholders throughout the initial needs assessment process, and then, in an ongoing fashion. This is an expansion of what was required for Perkins IV regarding stakeholder involvement in the local application. Prior to embarking on the assessment, the following steps will help lay the groundwork for a rigorous and meaningful needs assessment through clear preparation and organization.

1. **Identify a Leadership Team**

   Consultation with a diverse body of stakeholders is required for the CLNA. As you review the list of minimum participants, it will be important to assemble a leadership team to help guide the work, set priorities, and maintain priorities. The team should be kept small and must include people that can leverage systems to assist in the task ahead. Suggested participants on the leadership team should include secondary and postsecondary administrators and educators, local workforce agency staff, local economic development board members, and parents, if appropriate.

TIP:

One person should be given the responsibility to coordinate the work – ***identify the wrangler****. This does not mean this individual does all the work but serves more as project manager by coordinating meeting times, ensuring deadlines are met, and serving as a wrangler.*

2. **Identify Required Stakeholder Participants**

   Perkins V requires, at a minimum, the following participants be engaged in the initial needs assessment, the local application development and in ongoing consultation:

   - Representatives of CTE programs from **both** secondary and postsecondary institutions including:
        - o Teachers, instructors, and faculty
        - o Career guidance and advisory professionals
        - o Administrators, principals
        - o Specialized instructional support personnel and paraprofessionals

Representatives of the State board, local workforce development board, regional economic development organizations, and local business and industry

- Parents and students
- Representatives of special populations
- Representatives of local adult and youth correction education programs (Louisiana Requirement)
- Representatives of regional or local agencies serving out-of-school youth, homeless children and youth, and at-risk youth
- Representatives of Indian Tribes and Tribal organizations in the State, where applicable
- Any other stake holder required by the Louisiana Community and Technical College System (LCTCS), the Louisiana Department of Education (LDOE), or local decision.

Don't be afraid to think of consultation in a broad fashion. In Appendix B, there are resources provided from: Public Participation Guide: Tools to Generate and Obtain Public Input. In addition to large group input sessions, the participation guide describes different tools to use with different sized groups and for different purposes. It also provides links to a variety of resources.

A worksheet is provided in Appendix C to assist with brainstorming possible participants in your stakeholder engagement activities around the CLNA.

Comprehensive Local Needs Assessment Framework

The comprehensive local needs assessment has six required elements including an evaluation of student performance, CTE program quality, alignment to industry need, progress toward being a full program of study, a description of recruitment and retention of staff, and finally equity issues around access to high quality CTE programs for all students. Many of these elements are interwoven and insights gained in one part may be helpful in tackling another part.

Section One: Gathering Information

This first section of the framework provides a structure to begin to look at each of the required parts of the CLNA. In the following pages you will find this information for each part:

- Brief description
- Suggested materials to gather and consult
- Suggested priority participants in the discussion
- Ideas for consultation
- Questions to consider

This task will seem daunting and will require time. As you design your approach, one resource you may have within your school, district, college or community would be those involved with the implementation of Every Student Succeeds Act (ESSA) and the Workforce Innovation and Opportunity Act (WIOA). They may have some ideas, lessons learned and best practices for you to adopt.

TIP:
*The next tip is to **share the load**. To do this, assign two people to be responsible for each part of the CLNA. While it will take everyone working together, it will be the pair's role to make sure the information is gathered, including any necessary interview and focus groups notes, and organized to share with the entire group. Their role is not to make judgement of the information gathered, but to present and help make sense of what has been collected so effective discussion can take place.*

PART A: Evaluation of Student Performance

The comprehensive local needs assessment shall include an evaluation of student performance including special populations and each subgroup. The CLNA must contain an evaluation of CTE concentrators' performance on each of the core performance indicators. While you are already required to do this as part of your local plan under Perkins IV, the evaluation must now at a minimum include a performance analysis of the subgroups as well.

Section 134(c)(2)(A) states the needs assessment must include:
an evaluation of the performance of the students served with respect to State determined and local levels of performance, including an evaluation for special populations and each subgroup described in section 1111 of the ESEA. (listed in table below)

Materials Needed	Suggested Stakeholders to Consult
• Perkins performance data for the past three years disaggregated by CTE program area and subpopulation groups including: o Gender o Race and ethnicity o Migrant status o Individuals with disabilities o Individuals from economically disadvantaged families including low- income youth and adults o Individuals preparing for nontraditional fields o Single parents including single pregnant women o Out of work individuals o English learners o Homeless individuals o Youth who are in or who have aged out of the foster care system o Youth with a parent who is on active duty military o *Court involved students, including those in youth and adult correctional facilities* • Comparison data for 'all' students – Secondary comparisons for graduation rates, academic performance and placement – Postsecondary comparisons for credential attainment and placement. • Strategies utilized to address performance gaps for specific subgroups along with outcomes for the strategies attempted	All stakeholders required by law particularly: • Administrators • Secondary teachers • Postsecondary faculty • Academic and career advising professionals • Tribal organizations and representatives • Corrections education staff • Representatives of special populations • Data staff

Suggested Strategies for Consultation
• Work group to examine data including educators, career guidance professionals, and representatives of special populations • Assemble educator groups by CTE career area to examine data

Questions to Consider

1. How are students in each CTE program performing on federal accountability indicatorsin comparison to non-CTE students?
2. How are students from special populations performing in each CTE program?
3. How are students from different genders, races, and ethnicities performing in each CTE program?
4. Which groups of students are struggling the most in CTE programs?
5. Where do the biggest gaps in performance exist between subgroups of students?
6. hich CTE programs have the highest outcomes and which have the lowest?
7. Are there certain CTE programs where special populations are performing above average? Below average?
8. Is there a trend across all CTE programs?
9. What are the potential root causes of inequities in performance in each CTE program?

PART B: Evaluation of Program Quality

This second part of the Comprehensive Local Needs Assessment examines CTE program quality. Participants will examine programs to describe how local CTE programs are:

- Sufficient in size, scope, and quality to meet the needs of all students served;
- Aligned to State, regional, Tribal or local in-demand industry sectors identified by the State workforce development boards; and
- Designed to meet local education; or
- Market needs not identified by the State boards or local workforce development boards.

PART B-1: Size, Scope, and Quality

What is size, scope and quality? These definitions are important to ensure funds are used to drive quality, equitable, and impactful programs. As we move forward with the Perkins V State plan development, these terms will be newly defined, but will be based on the broad definitions below.

Size:
In general, size refers to the quantifiable evidence, physical parameters and limitations of each approved program that relate to the ability of the program to address all student learning outcomes. Generally, size will be defined by items such as the required number of programs, required class size, and availability of facilities and equipment to ensure quality, equity and access.

Scope:
Program scope provides curricular expectations of each program and/or program of study to cover the full breadth of its subject. Generally, scope involves the number of required courses, sequence, early postsecondary and work-based learning opportunities, the role of advisory committees, and the role of Career Technical Student Organizations (CTSOs)

Quality:

CTE program quality provides expected outcomes and impact of each program and/or CTE program of study including the ability to earn industry valued credentials, academic skills, and access to high- skill, high-wage, and in-demand programs.

Section 134(c)(2)(B)(i) states the needs assessment must include:
A description of how career and technical programs offered are sufficient in size, scope, and quality to meet the needs of all students served.

Materials Needed		
Size (capacity focus): • Total number of CTE programs and number of courses within each CTE program • CTE participant and concentrator enrollments for the past three years, aggregate and disaggregated. • Capacity of each CTE program for the past three years • Number of students applying for the CTE programs in the last three years, if applicable • Number of students on waiting lists, if applicable • Survey results assessing student interest in particular CTE programs	Scope (curricular focus): • Documentation of CTE program course sequences from secondary to postsecondary, including aligned curriculum • Credit transfer agreements for CTE programs • Data on student retention and transition from secondary to postsecondary within the CTE program of study • Descriptions of dual/concurrent enrollment programs and data on student participation • Data on student credential attainment in each program disaggregated by student demographic and value of credential • Curriculum standards showing depth and breadth of program • Opportunities for extended learning within and across CTE programs of study	Quality (outcome focus): • Curriculum standards and frameworks showing alignment to industry need • Assessments leading to credential of value • Partnership communication and engagement activities • Safety requirements • Work based learning procedures • Career Technical Student Organization (CTSO) activities and alignment to curriculum • Data collection mechanisms • CTE program improvement processes • Placement in employment following CTE program participation • Results of outside evaluation tools. Some examples are included in Appendix D

Suggested Stakeholders to Consult
All stakeholders required by law, particularly: • Administrators, teachers, and faculty • Representatives of special populations • Corrections education staff • Tribal organizations and representative • Parents and students • Career guidance and advisory professionals • Data staff
Suggested Strategies for Consultation
• Work group to examine data including educators, career guidance professionals, representatives of special populations, and employers. • Face-to-face group of educators to examine data • Focus group to interview or survey: o parents and students, o employers, o separate group for those representing special populations, corrections educations, and Tribal organization o guidance staff
Questions to Consider
1. Am I offering CTE programs in which students are choosing to enroll? 2. Am I offering CTE programs with too low an enrollment to justify the costs in offering those programs? 3. Am I offering a sufficient number of courses, and course sections, within programs? 4. Are there students who want to enroll in my CTE programs but are unable to do so? 5. What populations of students are and are not accepted into my programs? What are some of the reasons? 6. Can a student complete each CTE program of study at my institution? 7. Do some of my CTE programs offer more opportunities for skill development than others, both in the classroom and through extended learning experiences? 8. Have there been sufficient conversations with secondary, postsecondary and business/industry to have a robust skill set developed in each program? 9. How do my programs compare to a set of quality standards developed by my state or by a relevant third party? 10. How do specific program areas compare in quality? 11. How do specific components of my programs, such as work-based learning or instruction compare in quality?

PART B-2: Labor Market Alignment

Perkins V continues to focus on aligning programs of study to high-wage, high-skill, or in-demand occupations. In the Comprehensive Local Needs Assessment, eligible recipients will provide an analysis of how CTE programs are meeting workforce and economic development needs. The assessment will look at how different resources are used to determine which CTE programs of study are made available for students.

Ultimately, this and subsequent CLNAs will inform your four-year Perkins application, but in the event, there is an unforeseen situation regarding the labor market, the LCTCS as your partner, will facilitate a solution to move forward. The needs assessment is required to be performed every two years, but can be done more often, if necessary.

Louisiana uses a Star Rating System to determine high-wage, high-skill, and in-demand occupations. The rating method looks at the long and short-term hiring outlook, current job openings, and wages. Occupations that have plentiful openings, but low wages cannot be rated higher than 2-stars. In Appendix E, there is a copy of the methodology used to determine star ratings for your information.

Section 134(c)(2)(B)(ii) states that the needs assessment must be:
Aligned to State, regional, Tribal, or local in-demand industry sectors or occupations identified by the State workforce development board described in section 101 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3111).

Materials Needed	Suggested Stakeholders to Consult
• State and Local Labor Market Information (LMI) current and projected employment • LMI long- and intermediate- term labor market needs • Data dashboards provided through CareerOutlook and DataUSA (two online search engines) • Results of any available gap analysis on educational outcomes and employment needs (check with local workforce board) • Input from local business and industry representatives, with reference to opportunities for special populations • Alumni employment and earning outcomes from a state workforce agency, or alumni follow-up survey • CTE Program of Study concentrator data for three years • Program size, scope, and quality analysis	All stakeholders required by law, particularly: • Administrators, teachers, and faculty • Career guidance and advisement professionals • Business and community partners • Local workforce development and economic development boards • Former students • Data staff
Suggested Strategies for Consultation	
• Work group to examine data including educators, career guidance professionals, and workforce development staff. • Focus group, interviews, study circle with: ○ Students and former students ○ Local agencies involved in workforce initiatives ○ Business, industry, and community partners	

Questions to Consider
1. What are the highest projected growth industries in my region? What occupations are part of that industry? 2. How are the CTE programs offered aligned to the demand? 3. How do CTE program enrollments match projected job openings? Where are the biggest gaps? 4. What are the emerging occupations and programs available for students in those areas? 5. What skill needs have industry partners identified as lacking in my programs? 6. Which programs graduate employees that thrive in the workplace? Why? 7. What opportunities exist in my local labor market for students with disabilities, English learners or other special populations? 8. Am I offering CTE programs that are not aligned to demand?

PART C: Progress Toward Implementing CTE Programs/Programs of Study

Section 134(c)(2)(C) states the needs assessment must include:
An evaluation of progress toward the implementation of career and technical education programs and programs of study.

Sec 3(41): Program of Study
A coordinated, non-duplicative sequence of academic and technical content at the secondary and postsecondary level that:

- Incorporates challenging State academic standards;
- Addresses both academic and technical knowledge and skills, including employability skills;
- Progresses in specificity (beginning with all aspects of an industry or career cluster and leading to more occupation-specific instruction);
- Has multiple entry and exit points that incorporates credentialing; and
- Culminates in the attainment of a recognized postsecondary credential.

In Appendix F, you will find a graphic representation used to explain the different types of programs that are offered in Louisiana schools and institutions. They range from a loose collection of interest-based stand alone or loosely linked classes to a fully aligned and articulated CTE Program of Study that culminates in a statewide industry credential. All CTE Programs should strive to become High Quality CTE Programs of Study. Perkins funds can be used to support only those programs that meet (at a minimum) the Perkins Program of Study threshold and the middle school exploratory programs if identified in the CLNA.

Materials Needed	Suggested Stakeholders to Consult
• Documentation of course sequences and aligned curriculum for each CTE program • Standards for academic, technical and employability skills taught per course • Credit transfer agreements for the program • Student retention and transfer trend data • Trend data on dual and concurrent enrollment in CTE programs • Definitions used for alignment, dual and concurrent enrollment, academic and technical standards • Trend data on student participation • Advisory committee notes/minutes • Data on credential attainment by type • Notes on industry participation	All stakeholders required by law, particularly: • Secondary and postsecondary teachers/faculty • Administrators, teachers, and faculty • Career guidance and advisement professionals • Corrections' education staff • Tribal organizations and representative • Business and community partners • Local workforce development and economic development boards • Students and former students • Representatives of special populations • Data staff

Suggested Strategies for Consultation

- Work group to examine data including educators, career guidance professionals, business and community leaders
- Focus group, interviews, study circle with:
  - Students and former students
  - Representatives of special populations
  - Corrections' education staff
  - Tribal organizations and representatives
  - Business, industry and community partners

Questions to Consider

1. How are my CTE programs fully aligned and articulated across secondary and postsecondary education?
2. Do my programs incorporate relevant academic, technical and employability skills at every learner level?
3. Do I have credit transfer agreements in place to help students earn and articulate credit?
4. Are students being retained in the same program of study?
5. Do students in CTE programs of study have multiple entry and exit points?
6. Are students in my CTE programs earning recognized postsecondary credentials? Which credentials?
7. What is the role of secondary and postsecondary partners in the current CTE program of study design and delivery?
8. What is the role of business and industry partners in the current CTE program of study development and delivery?

PART D: Recruitment, Retention, and Training of CTE Educators

The comprehensive local needs assessment will also assess the educator workforce in your programs. This is not just about teachers, instructors, and faculty, but also includes specialized instructional support personnel, paraprofessionals, and career guidance and advisement professionals. An important part of this assessment asks participants to look at the diversity of these professionals and how closely they match the diversity of the education system in the local or regional community.

Section 134(c)(2)(D) states the needs assessment must include:
A description of how the eligible recipient will improve recruitment, retention, and training of career and technical education teachers, faculty, specialized instructional support personnel, paraprofessionals, and career guidance and academic counselors, including individuals in groups underrepresented in such professions.

Materials Needed	Suggested Stakeholders to Consult
• Data on faculty, staff, administrator and counselor preparation, credentials, salaries and benefits and demographics • Student demographic data • Description of recruitment process • Description of retention process • Description of professional development, mentoring and externship opportunities • Data on educator participation in professional development, mentoring and externships • Findings from educator evaluations or other resources about impact of professional development, mentoring and externships • Survey or focus results conducted with educators regarding needs and preferences • Trend data on educator and staff shortage areas in terms of CTE area and demographics (at least past 5-10 years) • Trend data on educator and staff retention in terms of CTE area and demographics (at least past 5-10 years)	All stakeholders required by law, particularly: • Secondary and postsecondary teachers/faculty • Human Resource department members • Administrators, teachers, and faculty • Career guidance and advisement professionals • Representatives of special populations • Corrections' education staff • Tribal organizations and representatives • Data staff
Suggested Strategies for Consultation	
• Work group to examine data including educators, career guidance professionals, and human resources staff • Focus group, interviews, study circle with: o Veteran teachers o Developing teachers o Individuals charged with selecting, designing and implementing professional development o Human resource staff	

Questions to Consider
1. How diverse is my staff? Does it reflect the demographic makeup of the student body? 2. What processes are in place to recruit new educators? 3. What onboarding processes are in place to bring new professionals into this system? 4. Are these processes efficient and effective, especially for educators coming from industry? 5. Are all educators teaching in my programs adequately credentialed? 6. Do I offer regular, substantive, and effective professional development around CTE academic and technical instruction based on identified need? 7. What has been the impact on mentoring and onboarding processes for new instructors, especially instructors coming from industry? 8. What professional development offerings are most highly rated by participant staff? Does this differ when looking at different factors such as length of time in position, certification, career area, etc.? 9. Is there a process to develop or recruit CTE instructors from existing staff? 10. In what subject areas do I need to develop or recruit more educators?

PART E: Progress Toward Improving Equity and Access

Here the needs assessment requires participants to assess progress toward providing equal access to all CTE programs. There should also be an examination of any barriers (real or perceived) that may prevent members of any special populations from entering and thriving in these programs.

Section 134(c)(2)(E) states the needs assessment must include:
A description of progress toward implementation of equal access to high-quality career and technical education courses and program of study for all students including:

- Strategies to overcome barriers that result in lower rates of access to, or performance gaps in, the courses and programs for special populations;
- Providing programs that are designed to enable special populations to meet the local levels of performance; and
- 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.

It is important to remind ourselves of who is included under the definition of special populations to ensure every special population is addressed in our needs assessment, our plan and our instructional services. The definition has broadened so it is important to check your data systems for access to information. (As a reminder, all definitions are included in section 3 of the new Perkins V act.)

Sec. 3(48) Special Populations
The term "special populations" means-

- Individuals with disabilities;
- Individuals from economically disadvantaged families, including low income youth and adults;
- Individuals preparing for non-traditional fields
- Single parents, including single pregnant women;
- Out-of-work-individuals;
- English learners;
- Homeless individuals described in section 725 of the McKinney-Vento Act;
- Youth who are in, or have aged out of, the foster care system;

- Youth with a parent who is:
  - a member of the armed service
  - on active duty status
- Court involved students including those in youth and adult correctional facilities

Materials Needed	Suggested Stakeholders to Consult
• Program promotional materials • Recruitment activities for each special population • Career guidance activities for each special population • Processes for communicating and providing accommodations, modifications, and supportive services for special populations • Available services to support all students, including special populations • Procedures for work-based learning for special population students • Information on accelerated credit and credentials available for special populations • Data on CTE participation and performance by each career area and each special population • Data on participation in CTSO in terms of special populations • Findings from the root causes and strategies analysis from the Student Performance components • Findings from the program quality component • Findings from surveys/focus groups with students, parents, and/or community representatives of special populations.	All stakeholders required by law particularly: • Secondary and postsecondary teachers/faculty • Administrators, teachers, and faculty • Career guidance and advisement professionals • Corrections' education staff • Tribal organizations and representatives • Representatives of special populations • Data staff

Suggested Strategies for Consultation
• Work group to examine data including educators, career guidance professionals, and representatives of special populations. • Focus group, interviews, study circle with: * Students and former students * Parents * CTSO advisors * Representatives of special populations * Corrections' education staff * Tribal organizations and representatives * Business, industry, and community partners
Questions to Consider
1. Overall, which population groups are underrepresented in your CTE programs andin each program area? 2. Which population groups are over-represented in CTE programs? 3. Looking back on the sections on program quality, labor market needs, and progress toward implementing programs of study, are there any enrollment discrepancies when comparing to programs that lead to high-wage, high-skill and in-demand occupations? 4. What is the difference between participant, concentrator and completer data foreach special population? What is in place that encourages students to complete CTE programs? What barriers are in place that prevent students from special populations from completing? 5. What barriers currently exist that prevent each special population group from performing in your CTE programs? 6. What accommodations, modifications, and supportive services do you currentlyprovide? Which are most effective? Which ones are underutilized? 7. What recruiting efforts are conducted to encourage special population students toenroll in high quality CTE programs? What seems to be effective? What seems to be producing little effect?

At this point in the process, the information is collected. Each part of the CLNA has been organized by the assigned pair of leaders. Now, it is time to discover what has been found. It will be **critical** in the process to take notes of the ensuing discussion to have the details available for reference to set priorities. The intent of the following pages would be to use the Word version of the document and record the discussion about each question.

CLNA Worksheets
A worksheet is provided below for each of the parts of the CLNA. There are two parts to the worksheet:

Rating
This section is to be completed at the end of the examination of the data and discussion of the questions. This will help gauge the extent to which the part of the CLNA is in place.

- It is important to agree on the meaning for each of the ratings provided. There are suggested terms for the ratings, but teams are encouraged to adjust them, if desired.
- There is a section to capture ideas and actions that may have come up as possibilities in the discussion process.

Questions to Consider
This section contains each of the questions to consider from section one. There is room to collect information and notes for later use.

- Plus – Strengths, positive trends
- Delta – Challenges, downward trends, gaps

TIP:
***Keep it straight**. There are several processes you might employ to begin to make sense of what you have found. You may want to schedule a separate meeting for each element in order to keep information separated and to keep minds fresh and alert.*

The CLNA Worksheets follow.

CLNA Worksheet Part A
Review data collected including any notes from interviews, focus groups, or other methodologies. Discuss each of these questions. Assign a notetaker to record the discussion **electronically** on this form. At the end, via consensus, assign a rating and rationale to this Part of the CLNA.

DO this part FIRST
Plus – strengths, going well, want to continue
Delta – challenge, needs work, needs change, lacking

Questions to Consider	Plus - Notes	Delta - Notes
PART A: Evaluation of Student Performance		
How are students in each CTE program performing on federal accountability indicators in comparison to non-CTE students?		
How are students from special populations performing in each CTE program?		
How are students from different genders, races and ethnicities performing in each CTE program?		
Which groups of students are struggling the most in CTE programs?		
Where do the biggest gaps in performance exist between subgroups of students?		
Which CTE programs overall have the highest outcomes and which have the lowest?		
Are there certain CTE programs where special populations are performing above average? Below average?		
Is there a trend across all CTE programs?		
What are the potential root causes of inequities in performance in each CTE program?		

FILL this box in LAST

Ratings:

1 Significant gaps and/or multiple gaps exist
2 Some gaps exist and/or we do not have a concrete plan to address them
3 Very few gaps exist, and we have processes in place to close the remaining gaps
4 No gaps exist

PART A: Evaluation of Student Performance	
Rating	Rationale and Potential Action Steps It is important to capture your thinking clearly here in order to avoid repeating work later in the process.

CLNA Worksheet Part B-1

Review data collected including any notes from interviews, focus groups, or other methodologies. Discuss each of these questions. Assign a notetaker to record the discussion **electronically** on this form. At the end, via consensus, assign a rating and rationale to this part of the CLNA.

DO this part FIRST

Plus – strengths, going well, want to continue
Delta – challenge, needs work, needs change, lacking

Questions to Consider	Plus - Notes	Delta - Notes
PART B-1: Program Size, Scope, and Quality		
Am I offering programs in which students are choosing to enroll?		
Am I offering programs with too low an enrollment to justify the costs in offering those programs?		
Am I offering a sufficient number of courses and course sections within programs?		
Are there students who want to enroll in my CTE programs, but are unable to do so?		
What populations of students are and are not accepted into my programs? What are some of the reasons?		
Can a student complete each program of study at my institution?		
Do some of my programs offer more opportunities for skill development than others, both in the classroom and through extended learning experiences?		
Have there been sufficient conversations with secondary, postsecondary, and business/industry to have a robust skill set developed in each program?		

Questions to Consider	Plus - Notes	Delta - Notes
How do my CTE programs compare to a set of quality standards developed by my state or by a relevant third party?		
How do specific CTE program areas compare in quality?		
How do specific components of my programs, such as work- based learning or instruction compare in quality?		

FILL this box in LAST Ratings:
1 Significant gaps and/or multiple gaps exist
2 Some gaps exist, and/or we do not have a concrete plan to address them
3 Very few gaps exist, and we have processes in place to close the remaining gaps
4 No gaps exist

PART B-1: Program Size, Scope, and Quality	
Rating	Rationale and Potential Action Steps It is important to capture your thinking clearly here in order to avoid repeating work later in the process.

CLNA Worksheet Part B-2

Review data collected including any notes from interviews, focus groups, or other methodologies. Discuss each of these questions. Assign a notetaker to record the discussion **electronically** on this form. At the end, via consensus, assign a rating and rationale to this part of the CLNA.

DO this part FIRST

Plus – strengths, going well, want to continue
Delta – challenge, needs work, needs change, lacking

Questions to Consider	Plus - Notes	Delta - Notes
PART B-2: Labor Market Alignment		
What are the highest projected growth industries in my region? What occupations are part of that industry?		
How are CTE programs offered aligned to the demand?		
How do CTE program enrollments match projected job openings? Where are the biggest gaps?		
What are the emerging occupations, and are CTE programs available for students in those areas?		
What skill needs have industry partners identified as lacking in my CTE programs?		
Which programs graduate employees that thrive in the workplace? Why?		
What opportunities exist in my local labor market for student with disabilities, English learners or other special populations?		
Am I offering CTE programs that are not aligned to demand?		

FILL this box in LAST Ratings:
1 Significant gaps and/or multiple gaps exist
2 Some gaps exist, and/or we do not have a concrete plan to address them
3 Very few gaps exist, and we have processes in place to close the remaining gaps
4 No gaps exist

PART B-2: Labor Market Alignment	
Rating	Rationale and Potential Action Steps It is important to capture your thinking clearly here in order to avoid repeating work later in the process.

CLNA Worksheet Part C

Review data collected including any notes from interviews, focus groups, or other methodologies. Discuss each of these questions. Assign a notetaker to record the discussion **electronically** on this form. At the end, via consensus, assign a rating and rationale to this part of the CLNA.

DO this part FIRST

Plus – strengths, going well, want to continue
Delta – challenge, needs work, needs change, lacking

Questions to Consider	**Plus - Notes**	**Delta - Notes**
PART C: Progress Toward Implementing CTE Programs and Programs of Study		
How are my CTE programs fully aligned and articulated across secondary and postsecondary education?		
Do my CTE programs incorporate relevant academic, technical and employability skills at every learner level?		
Do I have credit transfer agreements in place to help students earn and articulate credit?		
Are students being retained in the same CTE program of study?		
Do students in the CTE programs of study have multiple entry and exit points?		
Are students in my CTE programs earning recognized postsecondary credentials? Which credentials?		
What is the role of secondary and postsecondary partners in current program of study design and delivery?		
What is the role of business and industry partners in the current program of study development and delivery?		

FILL this box in LAST Ratings:

1 Significant gaps and/or multiple gaps exist
2 Some gaps exist, and/or we do not have a concrete plan to address them
3 Very few gaps exist, and we have processes in place to close the remaining gaps
4 No gaps exist

PART C: Progress Toward Implementing CTE Programs and Programs of Study	
Rating	Rationale and Potential Action Steps It is important to capture your thinking clearly here in order to avoid repeating work later in the process.

CLNA Worksheet Part D

Review data collected including any notes from interviews, focus groups, or other methodologies. Discuss each of these questions. Assign a notetaker to record the discussion **electronically** on this form. At the end, via consensus, assign a rating and rationale to this part of the CLNA.

DO this part FIRST

Plus – strengths, going well, want to continue

Delta – challenge, needs work, needs change, lacking

Questions to Consider	Plus - Notes	Delta - Notes
PART D: Recruitment, Retention, and Training of CTE Educators		
How diverse is my staff? Does it reflect the demographic makeup of the student body?		
What processes are in place to recruit new educators?		
What onboarding processes are in place to bring new professionals into this system?		
Are these processes efficient and effective, especially for educators coming from industry?		
Are all educators teaching in my CTE programs adequately credentialed?		
Do I offer regular, substantive, and effective professional development around CTE academic and technical instruction based on identified needs?		
What has been the impact on mentoring and onboarding processes for new instructors, especially instructors coming from industry?		

What professional development offerings are most highly rated by participant staff? Does this differ when looking at different factors such as length of time in position, certification, career area, etc.?		
Is there a process to develop or recruit CTE instructors from existing staff?		
In what subject areas do I need to develop or recruit more educators?		

FILL this box in LAST

Ratings:
1 Significant gaps and/or multiple gaps exist
2 Some gaps exist, and/or we do not have a concrete plan to address them
3 Very few gaps exist, and we have processes in place to close the remaining gaps
4 No gaps exist

PART D: Recruitment, Retention, and Training of CTE Educators	
Rating	Rationale and Potential Action Steps It is important to capture your thinking clearly here in order to avoid repeating work later in the process.

CLNA Worksheet Part E

Review data collected including any notes from interviews, focus groups, or other methodologies. Discuss each of these questions. Assign a notetaker to record the discussion **electronically** on this form. At the end, via consensus, assign a rating and rationale to this part of the CLNA.

DO this part FIRST

Plus – strengths, going well, want to continue
Delta – challenge, needs work, needs change, lacking

Questions to Consider	Plus - Notes	Delta - Notes
PART E: Progress Toward Improving Equity and Access		
Overall, which population groups are underrepresented in your CTE programs and in each program area?		
Which population groups are over-represented in CTE programs?		
Looking back on the sections on program quality, labor market needs, and progress toward implementing programs of study, are there any enrollment discrepancies when comparing to programs that lead to high- wage, high- skill and in-demand occupations?		
What is the difference between participant, concentrator and completer data for each special population? What is in place that encourages students to complete programs? What barriers are in place that prevent students from special populations from completing?		
What barriers currently exist that prevent each special population group performing in your programs?		
What accommodations, modifications, and supportive services do you currently provide? Which are most effective? Which ones are underutilized?		
What recruiting efforts are conducted to encourage special population students to enroll in high quality CTE programs? What seems to be effective? What seems to be producing little effect?		

FILL this box in LAST Ratings:

1 Significant gaps and/or multiple gaps exist
2 Some gaps exist, and/or we do not have a concrete plan to address them
3 Very few gaps exist, and we have processes in place to close the remaining gaps
4 No gaps exist

PART E: Progress Toward Improving Equity and Access	
Rating	Rationale and Potential Action Steps It is important to capture your thinking clearly here in order to avoid repeating work later in the process.

Review data collected including any notes from interviews, focus groups or other methodologies. Discuss each of **electronically**

Section Three: Merging Findings and Setting Priorities

Finishing the CLNA and beginning the local application for Perkins funds are the next steps in the process and will require input from the required partners. Be creative and use your resources to get that valuable input. It does not have to happen in a large public forum but might create more thoughtful outcomes when employing those other engagement strategies listed in the appendix.

Engaging stakeholders in a discussion about local and regional goals is critical as you conclude this process. Ensuring the stakeholder group understands the seven required uses of funds and the nine elements of the local application will be critical, at this point. Armed with facts and information, the leadership team can work with the stakeholder group to do the final steps and prepare for the local application.

Arguably, the next part of the needs assessment is the most difficult. It is time to review your findings and determine what steps to take. Likely, there are considerably more issues and actions than can be addressed at this time; however, it is important to narrow the list of needs to a key set of actions that will have the greatest impact on:

- Closing performance gaps for special population groups;
- Improving program size, scope, and quality and insuring labor market alignment;
- Improving program quality;
- Making sure you have the best and most diverse educators; and
- Removing barriers that reduce access and success.

In prioritizing areas of focus, go back to the notes from your discussions and consider more broad questions from each part such as:

- Part A: Which performance areas are providing the most difficulty? For which student groups? What can be done to address those needs?
- Part B-1: Which programs are strong and need to be supported to continue to keep momentum? Which programs are struggling and need to be discontinued or reshaped to be of adequate size, scope, and quality? Are there specific components of program quality that present challenges across career areas?
- Part B-2: Are programs adequately addressing current and emerging employer needs? Will programs allow students to earn a living wage when they become employed?
- Part C: Are secondary, postsecondary, and support systems aligned to ensure students can move through the pathway without barriers or replication? Are credentials awarded to students of economic value to students and employers?
- Part D: How will you get teachers to join your staff? What support is needed to retain effective teachers and instructors?
- Part E: Which subpopulations are struggling the most? Are there activities to undertake that would remove barriers right away? What are long-term solutions to ensure all subpopulations are successful?

These will be difficult discussions. The outcome of this final step will be to identify activities to fund in the coming four years. The leadership team will likely need to make some tough decisions about how to prioritize the need and design the action steps to be included in the Perkins Local Application.

The outcome of this final step will be to identify activities to fund in the coming four years. The leadership team will likely need to make some tough decisions about how to prioritize the need and design the action steps to be included in the Perkins Local Application.

The intent of the following page would be to use the Word version of the document to summarize your findings for the Local Application.

Describe the results of the comprehensive local needs assessment. (Sec. 134(b)(1))

Comprehensive Local Needs Assessment				
Required Component	**RESULTS A. What data was used?**	**RESULTS B. What process was used?**	**RESULTS C. What were your findings?**	**RESULTS D. How can Perkins funds be used to address your findings (including action steps)?**
A. Evaluation of Student Performance				
B-1. Program Size, Scope and Quality				
B-2. Program Alignment to Industry				
C. Progress Toward Program of Study				
D. Recruitment, Retention and Training of CTE Educators				
E. Progress Toward Improving Equity				

Appendix A: Reference Documents

Perkins V Guidance:

A Guide for State Leaders: Maximizing Perkins V's Comprehensive Local Needs Assessment & Local Application to Drive Quality and Equity in CTE (Word and PDF)

This guide from Advance CTE provides a summary, analysis and guidance for each major component of the Comprehensive Local Needs Assessment and the decisions states can be making now to support a robust CLNA process that aligns with the state's overall vision for CTE

A Guide for Local Leaders: Maximizing Perkins V's Comprehensive Local Needs Assessment & Local Application to Drive Equality in CTE (PDF)

This guide from ACTE provides an overview and guidance for the Comprehensive Local Needs Assessment so that local leaders can utilize it as a tool for program improvement.

Policy Benchmark Tool: CTE Program of Study Approval (LINK)

This guide from Advance CTE provides a tool for policy evaluation. An effective process for setting priorities is modeled in this guide.

Other Resources:

Also, the needs assessment in Perkins V was modeled after the one for Title IV-A (Student Support and Academic Enrichment Grants) in ESSA (with some changes) so these resources that might serve as useful reference points:

Using Needs Assessments for School and District Improvement: A Tactical Guide

Council of Chief State School Officers. December 5, 2018 **(LINK)**

Worksheets From: Using Needs Assessment for School and District Improvement

Council of Chief State School Officers. Julie Corbett and Sam Redding. 2017. **(LINK)**

Needs Assessment Guidebook

State Support Network. Cary Cuiccio and Mary Husby-Slater. May 2018 **(LINK)**

Appendix B: Public Participation Guide: Tools to Generate and Obtain Public Input

https://www.epa.gov/international-cooperation/public-participation-guide-tools-generate-and-obtain-public-input

Excerpt from document:

The following table lists some basic in-person tools for obtaining public input.

In-Person Tools for Generating Input

Tool	# of Participants	Best Suited for
Interviews	Individual or Small Group	Learning about individual perspectives on issues
Focus Groups	Small groups (15 or fewer)	Exploring attitudes and opinions in depth
Study Circles	Small (5-20)	Information sharing and focused dialogue
Public Meetings/Hearings	Large groups	Presenting information to and receiving comments or feedback from the public
Public Workshops (Effective Engagement Toolkit from Victoria, Australia, Department of Sustainability and Environment)	Multiple small groups (8-15 in each small group)	Exchanging information and/or problem-solving in small groups.
Appreciative Inquiry Process	Varies, but usually involves "whole system"	Envisioning shared future, not making decisions
World Cafes	Very adaptable, involving multiple simultaneous conversations (4-8 in each small group)	Fostering open discussion of a topic and identifying areas of common ground
Charrettes	Small to medium	Generating comprehensive plans or alternatives

In-Person Tools for Generating Input		
Tool	**# of Participants**	**Best Suited for**
Electronic Democracy	Unlimited	Enabling the direct participation of geographically dispersed public at their convenience
Computer-Assisted Processes	Large	Receiving real-time quantitative feedback to ideas or proposals

Appendix C: Potential Partner Worksheet

Use this template to identify potential partners for your CLNA. All listed are **required** in Perkins V unless noted with *.

NOTE: * denotes if adopted, the Louisiana Perkins Plan will add these as required partners.

Role	Person	Organization	Email/Contact
Secondary CTE teachers			
Secondary career guidance and academic counselors			
Secondary principal, administrator, leader			
Secondary instructional support, paraprofessional			
Postsecondary CTE faculty			
Postsecondary administrators			
*Postsecondary career guidance and advising professionals			
*Youth corrections education representative			
*Adult corrections education representative			

Role	Person	Organization	Email/Contact
Members of local workforce development boards			
*Member of regional economic development organization			
Local Business and Industry Representatives			
Parents and students			
Representatives of special populations: *Gender, race, ethnicity, migrant status, disability, economically disadvantaged, nontraditional, single parent, pregnant women, out of work individuals, English learners, homeless, foster care, active duty military, *corrections.*			
Representatives of regional or local agencies serving out-of -school youth, homeless children and youth and at-risk youth.			
Representatives of Indian Tribes and Tribal organizations			
Other stakeholders desired			

Appendix D: Program Quality Evaluation Tools

ACTE's Quality CTE Program of Study Framework
ACTE's evidence-based framework assessing across 12 elements to capture the program scope, delivery, implementation and quality. It also touches on program staffing and equity. (LINK)

Rubric for Linked Learning Pathway Quality Review and Continuous Improvement
Guide to planning and implementing high quality linked learning pathways (LINK)

Design Specification for Implementing the College and Career Pathways System Framework
American Institutes for Research facilitator's guide for continuous improvement in designing a career pathway system. (LINK)

Appendix E: Star Rating Methodology

9/3/15

Star Rating Methodology

Louisiana's Star Rating system was developed in response to the need to broaden our assessment of "top" occupations to be prioritized by training and education policymakers. The previous system effectively identified jobs with the best long-term (10-year) hiring outlook, but incorporated no additional job characteristics. The star-rating system has been augmented to also consider immediate opportunities and wages associated with that job, as well as short-term (3-year) hiring outlook. Points are assigned for each job characteristic as described below.

Long-Term Occupational Hiring Outlook

For all long-term occupational projections, the steps to derive a ranking for hiring outlook are as follows:

1. Eliminate "All Other" occupations (occupations having SOC codes that end in the number "9"
2. Find decile ranking for each occupation in terms of:
    a. Projected annual job openings
    b. Projected percent growth in the total number employed
3. For each metric, assign 1-10 points for each occupation based on the decile ranking
4. Average the points for annual openings and percent growth to determine the overall hiring outlook points

Short-Term Occupational Hiring Outlook

Points for short-term hiring outlook are derived following the same approach as the long-term outlook, but using data from the short-term forecast.

Current Job Openings

To be considered an occupation that is in top demand, it is reasonable to expect qualified job seekers to be able to find openings in that occupation without much delay. Therefore, current job openings points are assigned based on actual job openings as reflected in the previous 12 months of online jobs postings data captured through the Louisiana Workforce Commission's jobs board, which includes spidering of other online job ads. Deriving points from this data is straightforward:

1. Eliminate "All Other" occupations
2. Aggregate openings for occupations by 6-digit SOC code, where tallies are more detailed
3. Find decile ranking for the number of postings by each occupation
4. Assign 1-10 points for each occupation based on the decile ranking

Wages

Finally, in order to prioritize occupations with higher average wages, wages are weighted more heavily than the individual measures of hiring opportunity in order to determine top-rated jobs. At the state and RLMA levels, wage decile thresholds across all jobs are pre-determined and updated annually to provide

Appendix F: CTE Progression of Programs

High Quality Perkins Program of Study (POS)

- **Grade 9-16 sequence** of contextualized and hands on courses - 3 or more credits (secondary)
- **Industry approved** skill set; **Statewide** industry credential
- Career **guidance** and support for success; Integrated pathway leading to **4 or 5 star occupations**
- **Regional** teams develop and evaluate POS every two years
- **Instructor collaboration** at all levels to ensure alignment - **bimonthly meetings**
- Identified in needs assessment
- State and Local Funding; **Perkins** Supplemental Funding

Perkins CTE Program of Study

- **Grade 9-16 sequence** of contextualized and hands on courses- at least 2 credits (secondary)
- **Industry approved** skill set; **Regional** or **state focus** list industry credential
- Career **guidance** and support for success; Integrated pathway leading to **4 or 5 star occupations**
- **Regional** teams develop and evaluate POS every two years
- **Instructor collaboration** at all levels to ensure alignment - **bimonthly meetings**
- Identified in needs assessment
- State and Local Funding; **Perkins** Supplemental Funding

Exploring Interests and Careers in High School

- State statute requirement for Career Diploma
- Loose **collection of CTE** and other courses for students to gain knowledge of careers; **explore** skills; prepare for entry level jobs and/or further education.
- Culminates in **regional** industry credential
- Based on regional market demand and **career diploma requirements**
- State and Local Funds

Exploring Interests and Careers in Middle School

- **Interest based** activities and/or courses offered during or outside of school time.
- Based on teacher, student or community interest
- State and Local Funds; **Perkins** if identified in needs assessment

Appendix 3 – Perkins Eligible CTE Program of Study Regional Planning & Development

PURPOSE:

The Strengthening Career and Technical Education for the 21st Century Act (Perkins V) focuses on expanding opportunities for every student to explore, choose, and follow career and technical education (CTE) programs of study and career pathways to earn credentials of value including postsecondary degrees and industry-based certificates.

More specifically, Perkins V states a CTE Program of Study must, at minimum, be a coordinated, non-duplicative sequence of academic and technical content at the secondary and postsecondary level that:

- Incorporates challenging, state-identified academic standards;
- Addresses academic and technical knowledge, as well as employability skills;
- Is aligned to the needs of industries in the state, region, Tribal community or local area;
- Progresses in content specificity;
- Has multiple entry and exit points that allow for credentialing; and
- Culminates in the attainment of a recognized postsecondary credential.

GOALS:

The Perkins Eligible CTE Program of Study should tell a story, meaning each program should aim to describe:

- how that program will support collaboration along the career continuum between middle, secondary, post-secondary education and employers.
- how that program will support secondary students obtaining post-secondary credit.
- how the program will allow for multiple entry and exit points for students.
- the recruitment process to attract and support students from special populations, especially those that have been traditionally underrepresented.
- the supportive services such as tutoring, transportation and other assistance provided to ensure all students can achieve success in the Perkins Eligible CTE Programs of Study.

PLANNING

PARTNERS/ITEMS NEEDED:

LCTCS should provide the following items:

- Questions for consideration
- CTE Programs by Career Cluster
- LA Perkins Eligible CTE Program of Study templates (sequence of courses and illustrations)
- LA Perkins Eligible CTE Program of Study Evaluation Tool

LDOE should provide the following items:

- Jump Start 2.0 Pathways (including course options)

Secondary should provide the following items:

- List of Industry Based Certifications (IBC) offered in each school system
- Potential CTE occupations based on education/training in CTE Program of Study
- Employability skills gained in each Jump Start Pathway or Career Cluster
- CTE dual enrollment courses, K-16 courses, or training partner courses currently offered (high school course name and number AND college course name and number)
- Advisory committee contacts for each CTE Program of Study (must include business/industry that is specific to the actual CTE Program of Study)
- District policies, procedures and processes related to Dual Enrollment, Prior Learning, and Advisory Committees (if applicable)
- CTSOs offered, work-based learning opportunities, and student support services offered
- Number of CTE instructors
- Credentials of CTE instructors
- CTE Instructor evaluation process
- CTE student recruitment process

Post-Secondary should provide the following items:

- IBCs offered at each institution (including credit course equivalencies- course name/number)
- CTE Programs of Study curriculum plan (courses required for post-secondary credential)
- Potential CTE occupations based on education/training in CTE Program of Study
- Employability skills gained in each CTE Program of Study or Career Cluster
- CTE dual enrollment courses currently offered (high school course name and number AND college course name and number)
- Articulation agreements with other post-secondary institutions (2+2 agreements for CTE programs)
- Advisory committee contacts for each CTE Program of Study (must include business/industry that is specific to the actual CTE Program of Study)
- Institutional policies, procedures and processes related to Dual Enrollment, Prior Learning, and Advisory Committees
- CTSOs offered, work-based learning opportunities, and student support services offered
- Number of CTE instructors
- Credentials of CTE instructors
- CTE Instructor evaluation process
- CLNA Summary (Worksheets A-E)
- CTE student recruitment process

Adult Education should provide the following items:

- Integrated Education & Training (IETs) and/or Career Pathways offered with your agency (including any credit course equivalencies- course name/number- and/or IBCs)
- Potential occupations based on education/training
- Work-based learning opportunities and student support services offered
- Number of CTE/Work Ready U (WRU) instructors
- Credentials of CTE/Work Ready U (WRU) instructors
- CTE/Work Ready U (WRU) instructor evaluation process
- CTE Student recruitment process

Corrections should provide the following items:

- IBCs offered at each institution (including credit course equivalencies- course name/number)
- Potential occupations based on education/training
- Student support services offered
- Advisory committee contacts for each CTE Program of Study (must include business/industry that is specific to the actual CTE Program of Study)

Workforce Development Boards should provide the following items:

- List of services offered through One-Stop
- Process for accessing client support services
- Eligibility criteria for in-school youth and out of school youth
- Client recruitment process

DEVELOPMENT

PART 1:

Secondary staff should answer the following:

- List 2-3 Jump Start pathways your students can participate in that are aligned with regional focus areas
- Which schools offer them?
- Do students participate on or off campus?
- What credentials can students earn?
- Who are your partners?

Post-Secondary staff should answer the following:

- List 2-3 CTE areas of focus agreed upon in your region
- Which campuses offer them?
- What credentials can students earn?
- Who are your partners?

Adult Education staff should answer the following:

- List 2-3 IETs/IBCs/Career Pathways your students can participate in that align with regional focus areas
- Which schools offer them?
- Are you on the advisory boards of those programs at the partnering institutions?
- Is there any co-teaching or co-planning involved?
- What credentials can students earn?
- What colleges do you partner with?

Corrections staff should answer the following:

- List 2-3 CTE pathways your students can participate in that are aligned with regional focus areas
- Which institutions offers them?
- Which colleges do you partner?
- Are you on the advisory boards of those programs at the partnering institutions?
- What credentials can students earn?

Workforce Development Boards should answer the following:

- What are the 3-5-star jobs in your region?
- Which institutions currently offer programs that lead to those occupations (based on your Education Training Provider list)?
- Are you on the advisory boards of those programs at the partnering institutions?
- What is the referral process for potential students' enrollment in CTE programs?
- How do students access support services?

DEVELOPMENT
PART 2:

Together, determine the following:

- 2-3 CTE Programs of Study in regional focus areas
    - Note: CTE Programs of Study with three (3) star jobs should not be considered as a regional focus unless the program is an exit point on a career ladder.
- Post-secondary credentials (including Industry Based Credentials) available
- Sequence of courses (academic & technical) for each CTE Program of Study, including entrance and exit points

DEVELOPMENT
PART 3:
Together, discuss and identify the following:

- Student performance for selected CTE courses and CTE Programs of Study programs (including secondary, post-secondary, adult ed, and corrections- if applicable)
- Labor Market data to support the selected programs (including workforce data)
- Industry commitment to the selected programs (including list of advisory committee members and description of their involvement)
- Experiential learning opportunities in the selected programs for students to gain employability skills
- CTE Course Alignment processes and opportunities available in the selected programs (including prior learning assessments, dual enrollment and concurrent enrollment opportunities, and/or articulation agreements)
- Equitable access in the selected programs (including recruitment of special populations and supportive services offered to members)
- Supportive services available to CTE students in the selected programs (including tutoring, transportation and other assistance)
- Professional development planned for selected programs (including joint activities within region for all groups)
- CTE instruction for the selected programs (including number of instructors, teacher credentials, and teacher evaluation process)

DEVELOPMENT
PART 4:
Illustrate the components of the CTE Program of Study through program mapping. Create your own diagram or choose a template from LCTCS. **NOTE**: All templates must include the required components included in the LCTCS templates.

IMPLEMENTATION
CRITERIA

Using Advance CTE's Rigorous CTE Program of Study Framework and ACTE's High Quality CTE Framework as guides, Louisiana identified the most pressing components for state adoption to frame the LA Perkins Eligible CTE Programs of Study:

1. Rigorous Course Standards
   a. This component highlights the development, implementation and revision of the CTE Program of Study curriculum.

2. Labor Market Demand
   a. This component highlights use of labor market information to support CTE Program of Study relevance.

3. Industry Involvement
   a. This component highlights business and industry partner recruitment, partnership structure and the wide variety of activities partners should be engaged in to support the CTE Program of Study and ensure programs are aligned with workforce needs.

4. Secondary and Post-Secondary Alignment and Early Post-Secondary Offerings
   a. This component highlights the articulation, coordination and collaboration that support programs of study, career pathways and accelerated learning.

5. Experiential Learning
   a. This component highlights the delivery of meaningful interactions with industry or community professionals that foster in-depth, firsthand engagement with the tasks required in each career field.

6. Equitable Access
   a. This component highlights CTE Program of Study promotion, student recruitment and strategies that support access and equity for various student populations.

7. High Quality Instruction
   a. This component highlights the qualifications of CTE Program of Study staff, including CTE teachers/ faculty and other personnel.

IMPLEMENTATION
EVALUATION

Using the criteria above, each component of the LA Perkins Eligible CTE Program of Study should be evaluated using a rubric system to rank elements from zero to three:

- Rating Score 0= Not achieved
  - The criterion is not implemented in the CTE Program of Study.

- Rating Score 1= Minimally achieved
    - The criterion is minimally implemented in the CTE Program of Study. For example,
        - implementation is just beginning
        - implementation is evident infrequently
        - implementation is evident in a small portion of the CTE Program of Study
        - access is limited to a small segment of students

- Rating Score 2= Moderately achieved
    - The criterion is evident in the CTE Program of Study, but implementation is uneven or incomplete. For example,
        - only part of the criterion is evident
        - implementation is evident part of the time, but not on a sustained and regular basis
        - implementation is evident in portions of the CTE Program of Study
        - access is available to most, but not all, students

- Rating Score 3= Substantially achieved
    - The criterion has been fully implemented throughout the entire CTE Program of Study. For example,
        - all parts of the criterion are evident
        - implementation is evident on a regular and sustained basis
        - implementation is evident across all portions of the CTE Program of Study
        - access is available to all students

IMPLEMENTATION

APPROVAL PROCESS

- The Perkins Regional Coalition Coordinators (PRCCs) will submit an electronic application for each regionally selected CTE Program of Study.
- The application will be reviewed by a committee which may include LCTCS, LDOE, as well as other external stakeholders. This will ensure LCTCS is providing an impartial evaluation process.
- Regions should begin the Planning and Development process now (if they have not done so).
    - June 2020- Regions gather documents listed in the planning phase
    - July 2020- Regions respond to questions listed in the development phase (3 parts); LCTCS publishes LA Perkins Eligible CTE Program of Study application
    - August 2020- Regions begin submitting completed applications for each regionally selected CTE Program of Study; Regions begin receiving approval of LA Perkins Eligible CTE Program(s) of Study for FY 2021-22