

Michigan Perkins Postsecondary New Dean's Orientation 2024

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Employment & Training

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MICHIGAN DEPARTMENT OF
LABOR & ECONOMIC
OPPORTUNITY

EMPLOYMENT
& TRAINING

Agenda

- What is Perkins?
- Perkins V Purpose
- Federal Legislation and Regulations
- Authority, Oversight and Flow of Funds
- Types of Perkins Grants
- Comprehensive Local Needs Assessment
- Uses of Funds
- Special Populations & Equity in CTE
- Accountability and Monitoring



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What is Perkins?

- Short for the *Strengthening Career and Technical Education for the 21st Century Act*.
- Federal statute that governs the administration of US Department of Education funds to states and eligible subrecipients.
- Exclusively centered around supporting Career and Technical Education at both the secondary and postsecondary levels around the country.



Federal Legislation and Regulations

Perkins V – The Strengthening Career and Technical Education for the 21st Century Act - [Public Law 115-224](#)

Education Department General Administrative Regulations - [EDGAR](#)

Uniform Grant Guidance – [UGG](#): 2 CFR Part 200



Perkins V: Purpose

To develop more fully the academic knowledge and technical and employability skills of secondary education students and postsecondary education students who elect to enroll in Career and Technical Education (CTE) programs and programs of study



Equity in CTE

All students, regardless of race, gender, culture/ethnicity, language, (dis)ability, sexual orientation, family background, and socioeconomic status, have equitable access to fair, impartial, high-quality secondary and postsecondary CTE Programs. Programs are aligned to rigorous academic and technical standards, and career ready practices through CTE educational resources, support services, and rigor, at the right moment in their education, to accomplish their individual, educational, and career goals.

Developed by MDE and LEO (2021)



Special Populations

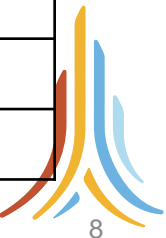
While previous versions of Perkins may have been considered a “Program Improvement” grant, Perkins V may be considered a “Special Populations” grant due to its emphasis on:

- Identifying CTE students who qualify as a special population's student via assessment
- Allowing for funding to enable special population's CTE students to succeed
- Requiring institutions to report the success rate by each individual special population category

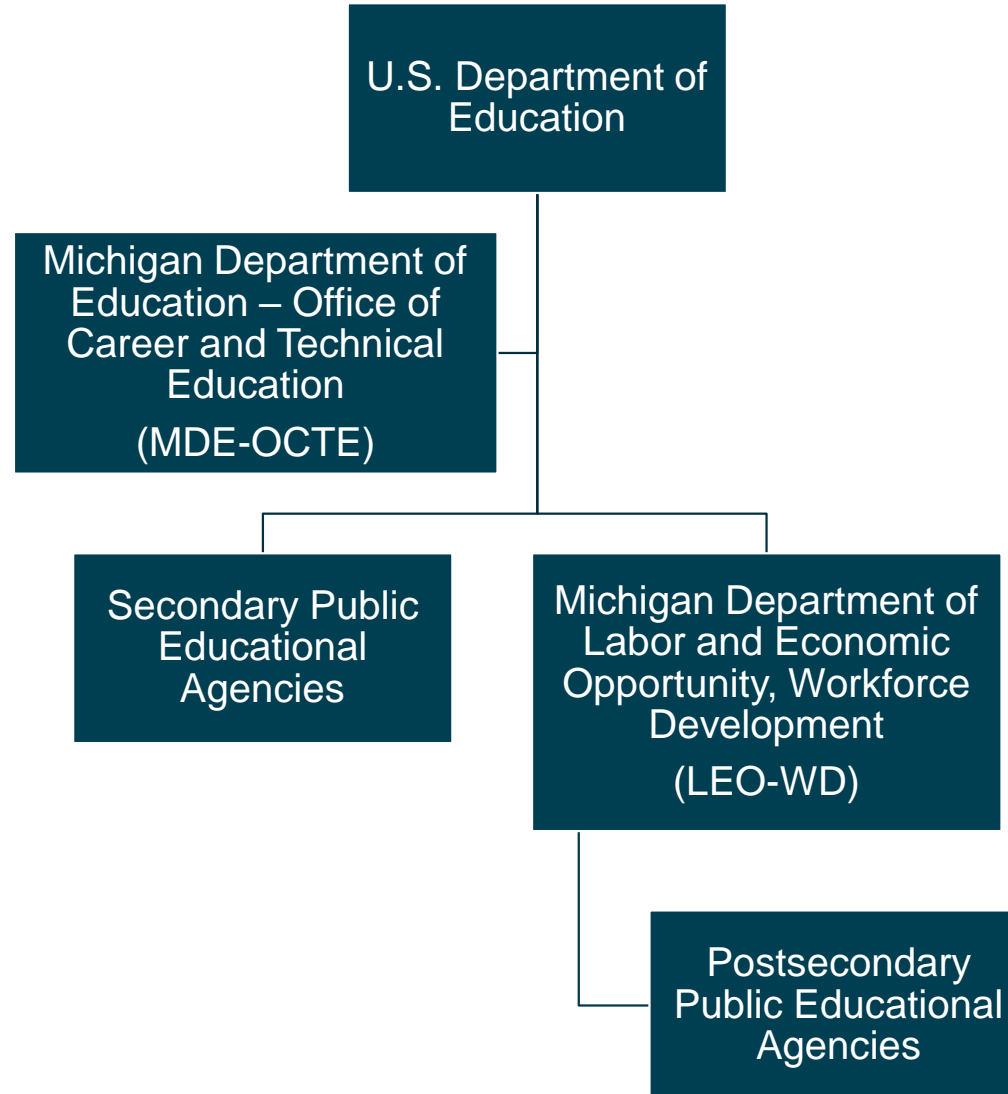


Perkins V Special Populations Categories

Special Population	Secondary	Postsecondary
Individuals with disabilities	Yes, in accordance with the Individuals with Disabilities Act	Yes, in accordance with the Americans with Disabilities Act
Economically disadvantaged families	Yes	Yes
Individuals preparing for non-traditional fields	Yes	Yes
Single parents (including single pregnant women; including low-income youth & adults)	Yes	Yes
Out-of-workforce individuals	Not-collecting	Yes
Youth who are in, or have aged out of foster care system	Yes	Yes
Youth with a parent who is a member of the armed forces and is on active duty	Yes	Not collecting data
Migrant students	Yes	Not collecting data
English learners	Yes	Yes
Homeless individuals	Yes	Yes

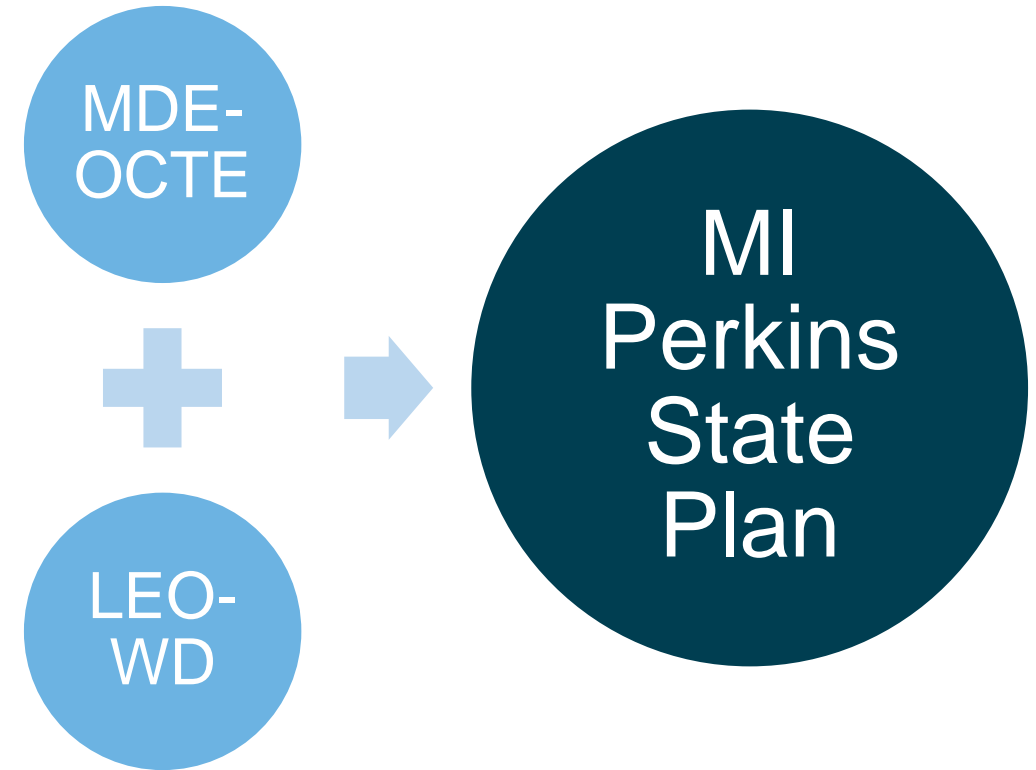


Authority, Oversight and Flow of Funds



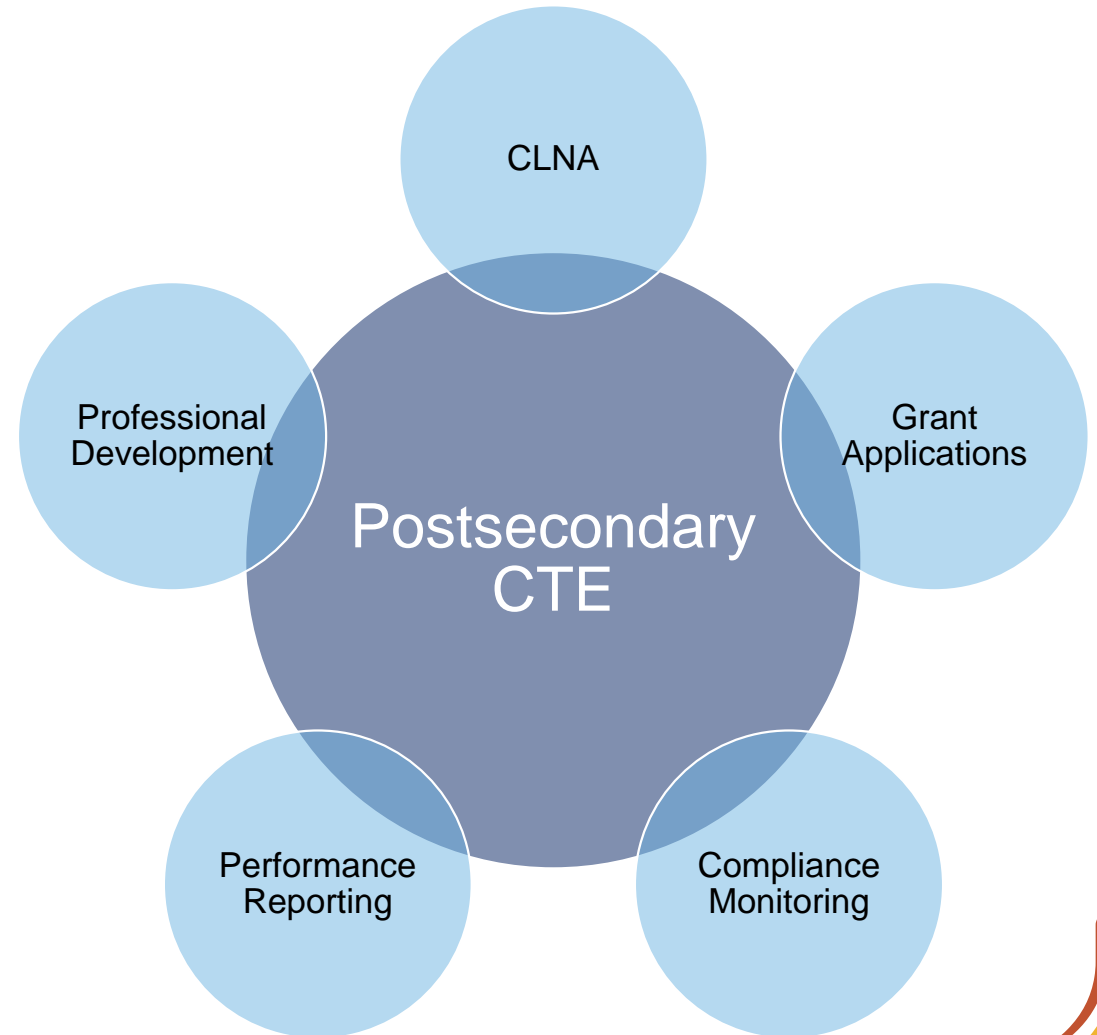
Michigan Perkins State Plan

- State Plan developed collaboratively with MDE-OCTE
- Updated every four years
 - Just submitted State Plan for '24-'28
- Outlines state level objectives and activities designed to advance CTE programs in Michigan at both secondary and postsecondary levels
- Approved by U.S. Department of Education Office of Career and Technical and Adult Education (OCTAE)



LEO-WD Perkins Responsibilities

- Administer Perkins Title I formula funds to 32 eligible postsecondary institutions.
 - Local Application, Final Report, Performance Reporting
- Administer the Perkins Comprehensive Local Needs Assessment.
- Execute compliance monitoring of eligible postsecondary institutions.
- Identify and facilitate high quality statewide professional development.
- Collaborate with MDE-OCTE to improve Career and Technical Education at both secondary and postsecondary institutions.



Michigan Perkins Postsecondary Institutions

Alpena Community College	Kellogg Community College	North Central Michigan College
Bay College	Kirtland Community College	Northern Michigan University**
Bay Mills Community College*	Lake Michigan College	Northwestern Michigan College
Delta College	Lake Superior State University**	Oakland Community College
Ferris State University**	Lansing Community College	St. Clair County Community College
Glen Oaks Community College	Macomb Community College	Schoolcraft College
Gogebic Community College	Mid Michigan College	Southwestern Michigan College
Grand Rapids Community College	Monroe County Community College	Washtenaw Community College
Henry Ford College	Montcalm Community College	Wayne County Community College District
Jackson College	Mott Community College	West Shore Community College
Kalamazoo Valley Community College	Muskegon Community College	

*Tribal College

**Four-year public university offering Associates degrees and certificates



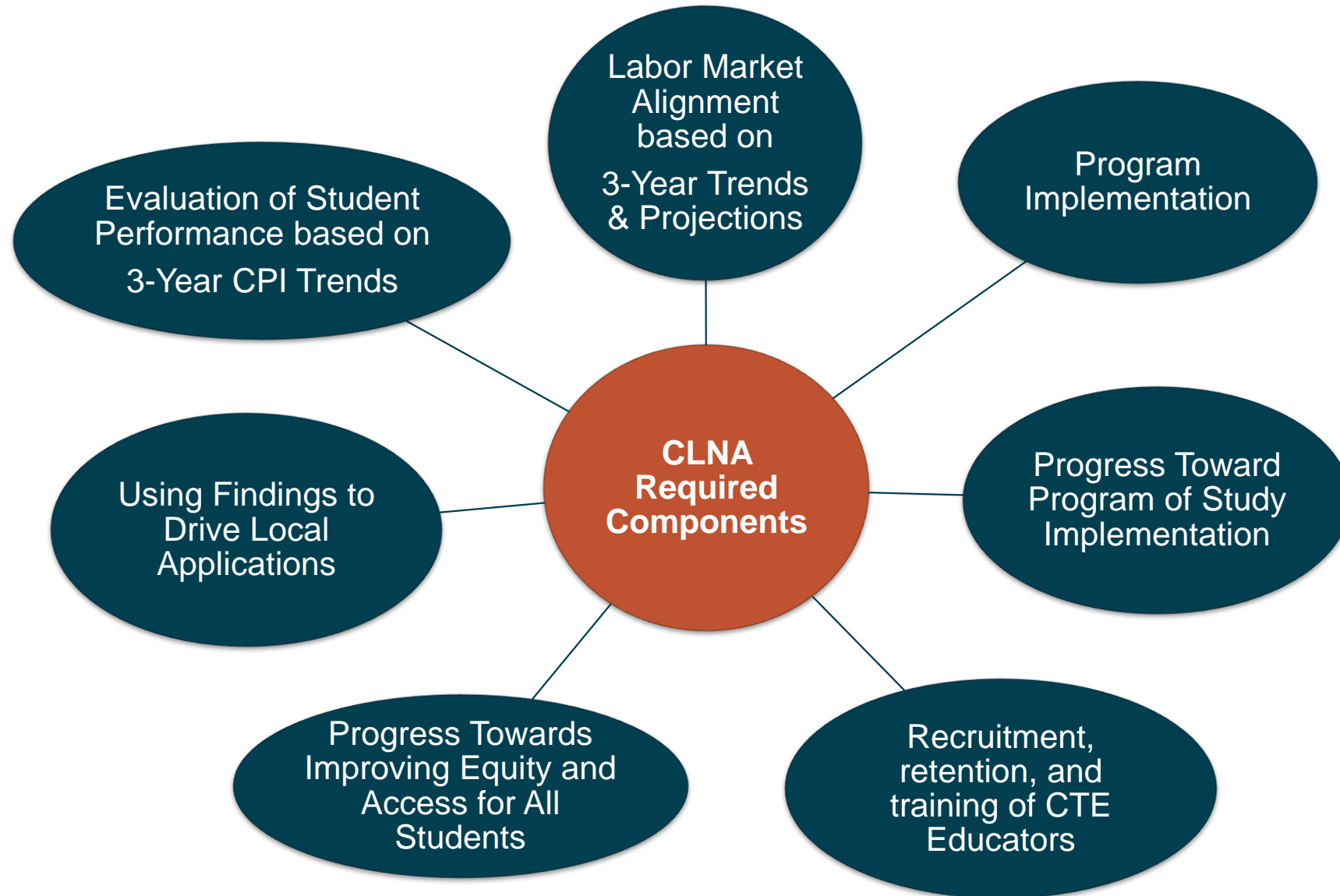
Comprehensive Local Needs Assessment

*“To be eligible to receive financial assistance under this part, an eligible recipient shall— (A) conduct a **comprehensive local needs assessment** related to career and technical education and include the results of the needs assessment in the local application submitted under subsection (a); and (B) not less than **once every 2 years, update** such comprehensive local needs assessment.”*

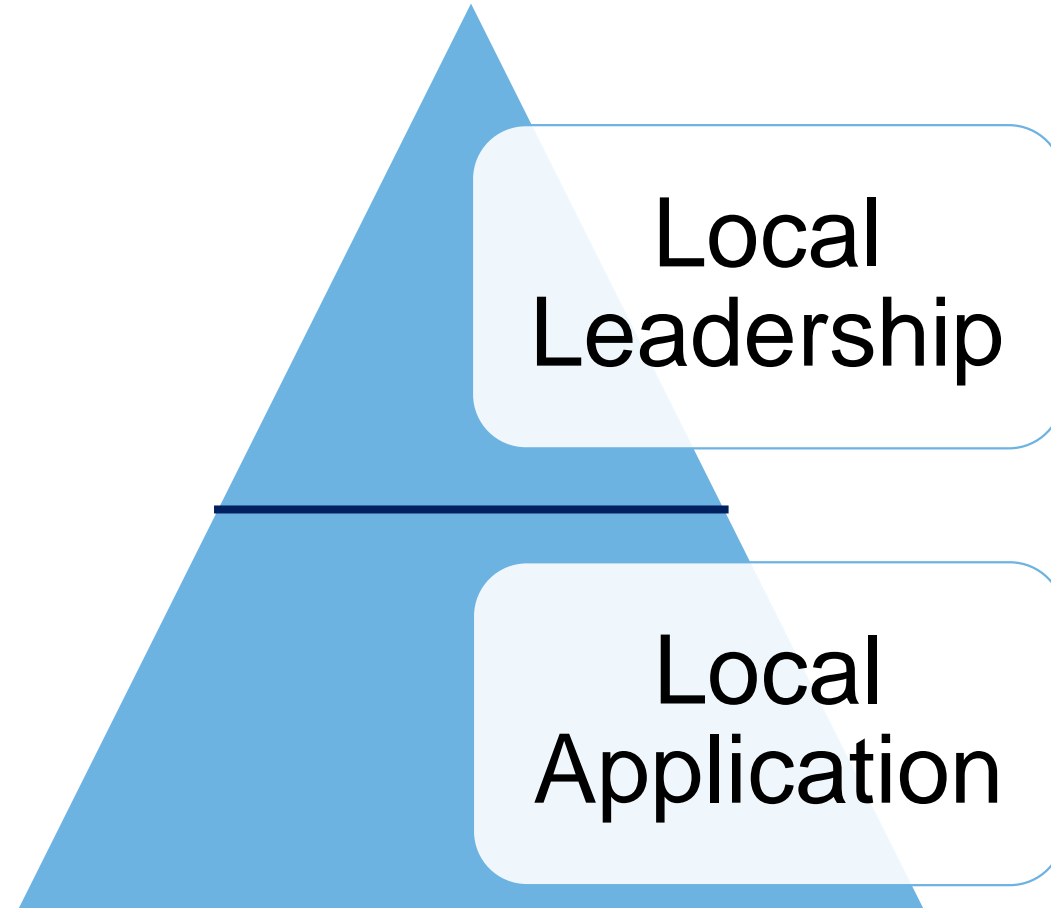
- New in Perkins V
- Template designed and provided by Perkins Postsecondary
- Updated at the local level every two years
- Results **MUST** drive the local application activities and budget
- Determines state-approved CTE programs of study and activities the institution will prioritize, informed by data
- **Truly strives to identify gaps and disparities in performance for students within Special Populations**



Comprehensive Local Needs Assessment



Grants Administered by LEO-WD Perkins Postsecondary



Local Leadership

- **\$9,200** available to support CTE Administrator salary and/or travel expenses related to Perkins administration.
- Annual application for funds to support a single CTE Administrator at the Perkins recipient institution.
- Application availability announced annually by Perkins Postsecondary.
- Application consists of:
 1. CTE Administrator Application – detailing qualifications of one local administrator that will utilize Local Leadership funding
 2. CTE Local Leadership Administrator Work Plan and Assurances of Compliance



Local Application

Starting in 2024 institutions will write a 4 Year Strategic Plan to identify local CTE priorities, strategies to address those priorities, and activities to execute the plan.

- Online grant application, completed at the local level.
- Institution's annual funding determined through Perkins V formula calculation.
- The strategic plan **MUST** reflect the needs identified in the institution's CLNA.
- Institutions develop and submit for approval an annual budget that addresses all Perkins V Required Uses of Funds.



Local Uses of Funds

In addition to being justified by an institution's CLNA, funds must be used to support CTE programs and Programs of Study that are of sufficient **size, scope and quality** to be effective and that appropriately address the following high-level activities according to the legislation:



Requirements for Uses of Funds

- 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 CTE program, in making informed plans and decisions about future education and career opportunities and programs of study
- 2) **Provide professional development** for teachers, faculty, school leaders, administrators, specialized instructional support personnel, career guidance and academic counselors, or paraprofessionals
- 3) Provide within CTE the **skills necessary to pursue careers in high-skill, high-wage, or in-demand industry sectors** or occupations



Requirements for Uses of Funds cont.

- 4) **Support integration of academic skills** into CTE programs and programs of study
- 5) Plan and carry out elements that **result in increasing student achievement** of the local levels of performance
- 6) **Develop and implement evaluations** of the activities carried out with funds under this part, including evaluations necessary to complete the comprehensive needs assessment and the local report required under section 113(b)(4)(B)



Requirements for Uses of Funds cont.

Perkins V outlines myriad permissible uses of funds within section 135.

Some examples include:

- Supporting career guidance and academic counselors that provide information on education and career options
- Activities that provide students with strong experience in, and comprehensive understanding of an industry
- Professional development activities
- Curriculum development
- Purchasing instructional supplies, materials and equipment
- Efforts to recruit and retain CTE teachers



Factors Affecting Allowability

- **Necessary** and **reasonable** for the performance of the federal award
- **Allocable** to the federal award
- **Consistent with policies and procedures** that apply uniformly to both federally-financed and other activities of the subrecipient
- Conforms to any limitations or exclusions set forth as cost principles in Part 200 or in the terms and conditions of the federal award
- Accorded consistent treatment as either a direct or indirect cost
- Adequately **documented**
- Determined in accordance with GAAP
- Not included as match or cost-share, unless authorized by the federal program
- Net of applicable credits
- Incurred during the approved budget period

For further information on the allowability of selected items of cost, refer to 2 CFR 200.420.



Time & Effort

Any employee paid in full or in part with federal dollars must maintain adequate time & effort documentation.

This includes full time and part time employees as well as federal stipends that are considered salary expenses.

- Must be based on records that accurately reflect the work performed.
- Must be after the fact.
- How often depends on number of cost objectives:
 - One = Semi-annually
 - Two or more = Monthly



Time & Effort cont.

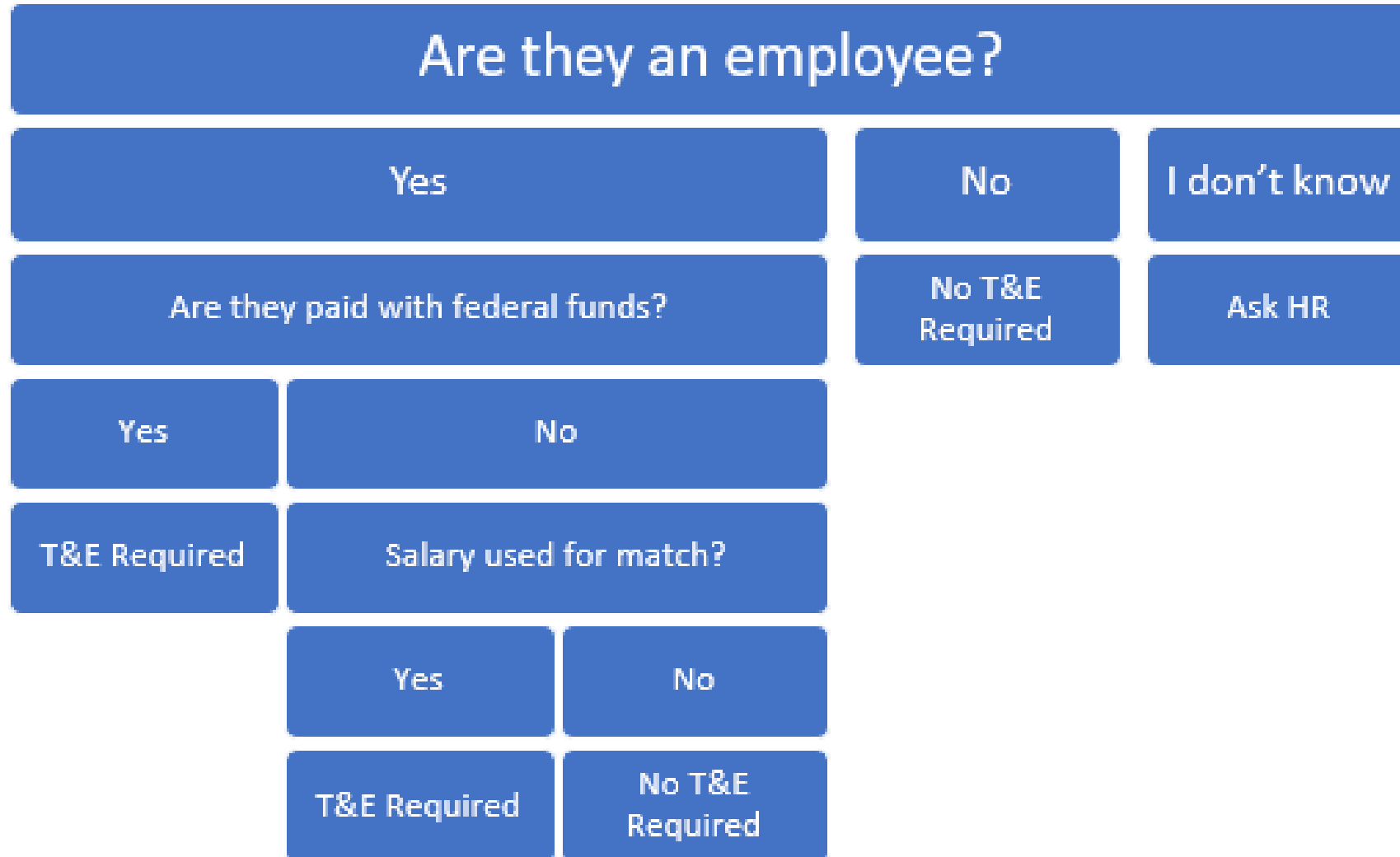
Standards for Documentation of Personnel Expenses 200.430(i)(1)

Time and Effort records **MUST**:

1. Be supported by a system of internal controls which provides reasonable assurance charges are accurate, allowable and allocable;
2. Be incorporated into official records;
3. Reasonable reflect total activity for which employee is compensated;
4. Encompass all activities (federal and non-federal);
5. Comply with established accounting policies and practices; and
6. Support distribution among specific activities or cost objectives.



Time & Effort cont.



Timely Obligations

Funds must be *obligated* within the period of performance.

34 CFR 76.707

Type of Obligation	When Obligation Occurs
Acquisition of Property	Date of binding written agreement
Personal Services by Employee	When services are performed
Personal Services by Contractor	Date of binding written agreement
Travel	When travel is taken
Approved Pre-Agreement Cost	On the first day of the grant or subgrant performance period



Cost of Attendance Supports

Attendance Cost Policy:

Institutions must develop policies for awarding attendance cost to Special Populations students.

- Identify students
- Assess students and determine services, supports, and greatest need
- Process for distributing funds
- Student records must be maintained

Allowable use of funds:

- Tuition and fees
- Allowance for books, supplies or transportation
- Dependent care
- Misc. personal expenses
- Necessary course equipment/supplies



Perkins V Special Populations Intake and Assessment



Special Populations Eligibility Determination and Planning Template

STUDENT INFORMATION		
Student Name: <input type="text"/>		ID #: <input type="text"/>
Address: <input type="text"/>		
Phone: <input type="text"/>	Email: <input type="text"/>	Date of Birth: <input type="text"/>
Gender Identification: <input type="text"/>	Marital Status: <input type="checkbox"/> Single <input type="checkbox"/> Married <input type="checkbox"/> Separated <input type="checkbox"/> Divorced <input type="checkbox"/> Widowed	
# of Dependent Children:	"Other" Dependents (individuals in your care): <input type="text"/>	



Compliance Monitoring

Purpose:

- A formal federal and state compliance requirement
- A review to assess continuous success of students and the local use of funds
 - To evaluate and ensure expenses are necessary, reasonable and allocable
- To provide technical assistance

Scope:

- Review of institutional records, policies/procedures and data, including but not limited to:
 - Non-discrimination policies
 - Personnel qualifications
 - Time & effort
 - Student support services
 - Instructional equipment
 - Financial management
 - Assessing continuous success of students and the local use of funds



Monitoring – Risk Assessment

Completed annually by Perkins Postsecondary

1. Subrecipients prior experience with the same or similar subawards
2. Results of previous compliance reviews
3. Existence of new personnel or new or substantially changed systems
4. Extent and results of Federal awarding agency monitoring (e.g., if also receiving Federal awards directly)
5. Achievement of approved Core Performance Indicators (CPIs)
6. Amount of funding allocation, expenditures and drawdowns
7. Timely submission of required reports.



Accountability and Core Performance Indicators (CPI)

Legislation requires data to be analyzed to:

- Determine student outcomes
- Identify gaps and root causes in low performance
- Help to develop strategies to improve programs and activities

Postsecondary CPIs:

- 1P1 – Postsecondary retention or transfer and placement
- 2P1 – Earned a recognized postsecondary credential
- 3P1 – Non-traditional program enrollment/concentration in non-traditional fields



Accountability Terms

Participant

Concentrator

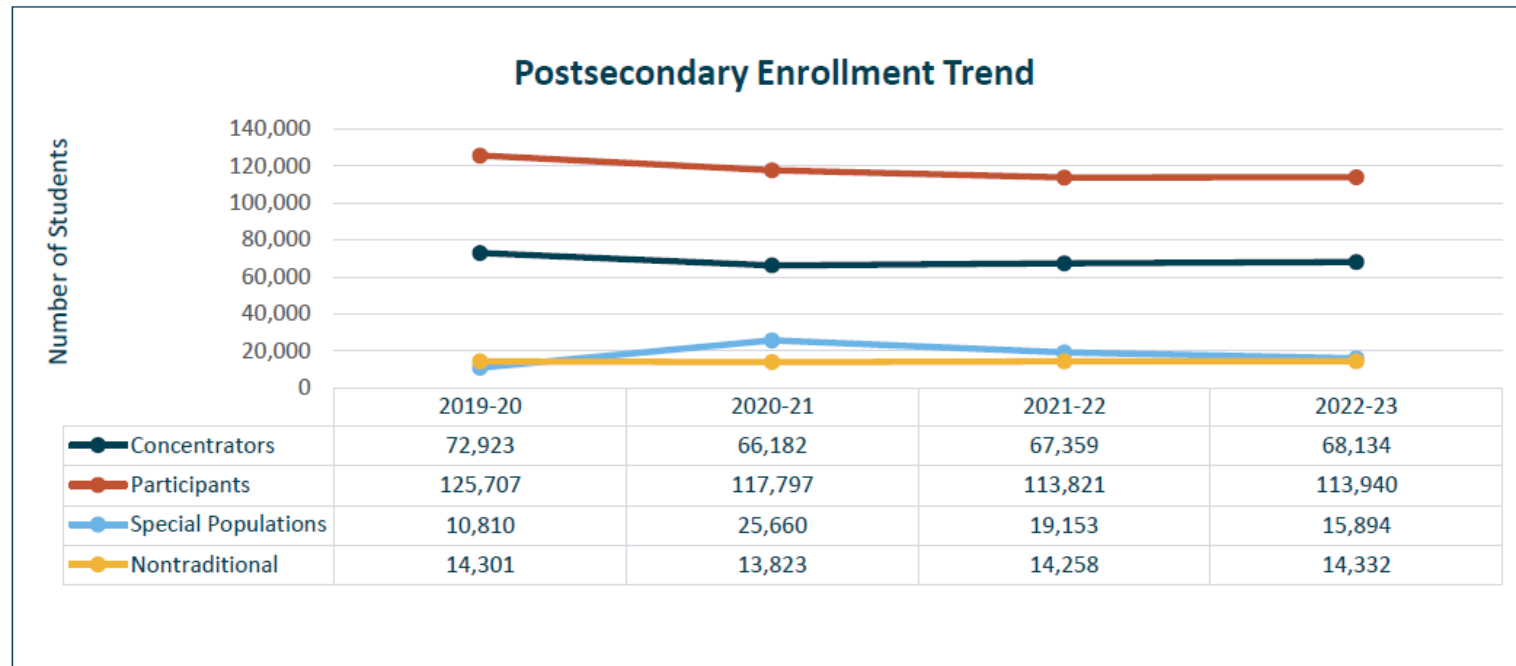
Exiter

Nontraditional

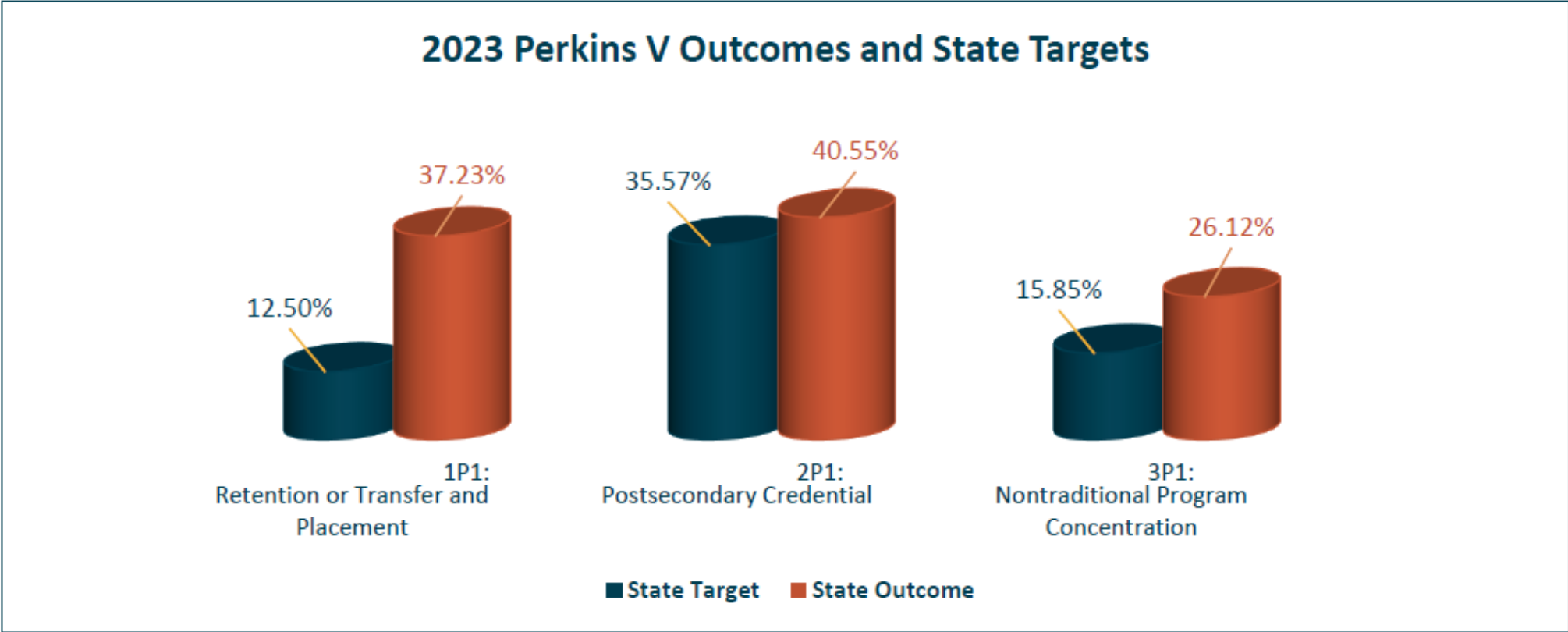
Accountability cont.

Perkins Postsecondary also collects data on:

- Special Populations by Gender
- Total CTE Concentrators
- Total CTE Participants
- Year End Program Enrollments



2023 Postsecondary Performance



Discussion and Overview

Expenditures prohibited by Perkins V include:

- a) Food purchases
- b) Direct assistance to students
- c) Support for students participating in CTE clubs and organizations
- d) Marketing and recruitment materials
- e) All of the above
- f) None of the above



Discussion and Overview

The Answer Is “F” – None of the above

Perkins V does not explicitly restrict the use of funds. In fact, it is more permissive than Perkins IV. There are six required uses of funds and 37 examples of permissive uses, concluding with “other activities to improve career and technical education programs.”

The disclaimer is the clause, “to meet the needs identified in the comprehensive needs assessment described in section 134(c).”



Discussion and Overview

The college can use Perkins funds for a cost charged to non-federal funds in the previous year.

a) True

b) False



Discussion and Overview

The correct answer is: False

- Utilizing Perkins funds for activities charged to non-federal funds in the previous year is considered supplanting



Discussion and Overview

A Special Populations Coordinator spends 40% of their time working with special populations students and activities, and the rest of their time working on non-federal activities. They do not need to keep time and effort reports.

a) True

b) False



Discussion and Overview

The correct answer is: False

- Any personnel working on Perkins related activities must maintain accurate percentage-based time & effort documentation aligned with the institution's internal control policies and procedures



Discussion and Overview

How many Perkins V Special Populations categories are there?

- a. 8
- b. 10
- c. 12
- d. None of the above



Discussion and Overview

The correct answer is: 10

- While there are 10 special populations categories outlined in Perkins V, postsecondary institutions do not collect data on two categories:
 - Youth with a parent who is a member of the armed forces and is on active duty
 - Migrant students



Discussion and Overview

May Perkins funds ever be used to provide direct support to students within special populations?

a. Yes

b. No



Discussion and Overview

The correct answer is: YES

- If the institution has identified direct support/cost of attendance support as an institutional priority within their CLNA and builds the costs into their local application, they may provide direct support to students assessed as being part of a special population



Questions and General Discussion

Perkins V can be an excellent resource to drive program improvement, development and implementation to continue identifying and removing barriers for all CTE students and especially students in Special Populations



Perkins Postsecondary Question Portal



<https://forms.office.com/g/ZUUvEiQA8K>





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CLNA Roundtable Discussion



CLNA Roundtable Discussion

1. Discuss your institutions process for planning how you will tackle the CLNA?

- a. How far in advance should do you start preparing?
- b. Who do you include on your team when working?
- c. How do you engage with your internal and external partners (i.e. department heads, advisory boards, institutional researchers)?



CLNA Roundtable Discussion

2. Do you feel your institution views the CLNA as a useful tool? If so, how and why?



CLNA Roundtable Discussion

3. Has your institution found success in engaging administration, faculty, and staff in your CLNA process throughout the year?

- a. What are some of the specific challenges you've encountered?
- b. What were some of your team's strengths when working on the CLNA?



CLNA Roundtable Discussion

4. Is there anything you wish you'd known while working on your first CLNA that you do know now (i.e. planning, scheduling, policy, resources etc.)?



CLNA Roundtable Discussion

5. How might you go about doing things differently going forward?





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