

**DRAFT Illinois Perkins and CTEI Grant Expenditure Guidance  
FY 2021**

*The purpose of this document is to give guidance on specific expenditures in both the Perkins<sup>1</sup> and CTEI grants. This document will be updated as necessary.*

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<sup>1</sup> Any time the Perkins grant is referenced, this applies to both Perkins – Secondary and Perkins – State Institutions (SI). In instances where the allowable expenditures differ, the full name of the grant will be referenced.

## The Basics – Expenditures must:

- Align to [Perkins V Section 135 – Local Uses of Funds](#) and support required Local Application Components ([Perkins V Section 134\(b\)](#)) for school districts, area career centers, and Education for Employment (EFE) Systems.
- Align to [Perkins V Section 124\(b\) – Permissible Uses of Funds](#) for State Institutions (SI).
- Be used for improving [size, scope, and quality](#) of approved programs referenced in the Local Application – CTE Programs and Activities pages.
- Align the Local Application – Goals and Strategies to the Comprehensive Local Needs Assessment results.
- Drive improvement in [levels of performance](#).
- Align to [ISBE’s State and Federal Grant Administration Policy, Fiscal Requirements, and Procedures](#).
- *Be necessary, reasonable and allocable.*
  - Necessary and Reasonable—Cost is recognized as ordinary and necessary for the operation of the grant, is market price for comparable goods or services, and has no significant deviation from the established prices.
  - Allocable (CFR 200.405)—Incurred specifically for the grant, benefits grant and other work of the entity, and is necessary to overall operations of the entity.
- *Supplement not Supplant (Perkins)* – Federal funds should supplement not supplant state and local funds.
  - Supplement – Grant funds that are received and expended in addition to funds the grantee would have expended in the absence of grant funds.
  - Supplant – Grant funds that are received and expended to replace funds the grantee would have expended in the absence of grant funds.
  - Contact ISBE CTE and Innovation Staff if a locally or state funded CTE program is at risk of closing.
- *Not be included as a match for another federal award.*
- *Be adequately documented* – Back-up documentation is required by school districts, area career centers, and EFEs for all expenditures. Examples include but are not limited to:
  - Time & effort documentation
  - Inventory management system
  - Procurement
  - Conflict of interest

## New Function/Object Codes

- 2620/100, 200, 300, and 400 (for system-wide assessment duties required in Perkins V – e.g., CLNA and program improvement plans)
- 2900/100, 200, 300, and 400 (for direct support to districts that isn’t professional learning, career guidance, or instruction)

## CTEI Elementary Allotment

Each EFE received a base amount in CTEI for elementary career exploration and development that must be spent on elementary career exploration and development grades K - 8. If the LNA indicates that additional funds are needed to support K-8 career exploration and development, a school district can spend above their CTEI Elementary allocation.

## CTEI Work-Based Learning Allotment

Each EFE received a base amount in CTEI for work-based learning that must be used for work-based learning, industry recognized credentials, and/or dual credit opportunities. Data will be collected on

these activities. Examples of how funds can be used include but are not limited to paying for certifications for students, support for students in dual credit courses such as supplies and materials, or professional learning for teachers on work-based learning.

See sections for Dual Credit/Dual Enrollment, Industry-Recognized Credentials/Certifications/Licenses, and Work-Based Learning for more specific information on use and restriction of funds for these purposes.

#### Not Allowable Uses of Funds:

1. Food for students or for staff/teacher professional development or meetings. See Food section for CTEI exceptions;
2. Support of any programs, activities, equipment, materials or personnel that do not meet the intent of the grant;
3. Monetary compensation/stipends to students;
4. Out-of-state travel for students, including but not limited to CTSO events/competitions or field trips (out-of-state = more than 50 miles from the Illinois border);
5. Direct tuition payments for staff or students (**exception** for special population students – see [Section 135\(b\)\(5\)\(S\)](#));
6. Student transportation to and from home school/serving school, except for special population students (see [Section 135\(b\)\(5\)\(S\)](#); e.g., local high school to area career center);
7. General classroom furniture, equipment, any physical plant modifications and building repairs (responsibility of the local districts);
8. Individual memberships to business, technical, and professional organizations (CFR 200.454); and
9. Costs related to lobbying activities (CFR 200.450).

#### Administrative Costs

- *CTEI*: Each EFE received a maximum administrative allotment in CTEI. Administrative costs must be at or below this level the Administrative Allotment (Function Codes 2300, 2520, and 2540); this does not include indirect costs. You do not need to use the maximum amount for administrative costs. We encourage you to minimize administrative spending to the greatest extent possible so that more funds flow directly to students. If indirect cost is used, there cannot be direct costs under function code 2520.
  - ISBE's State and Federal [Grant Administration Policy, Fiscal Requirements, and Procedures](#): "Indirect Costs are costs a grantee incurs for common or joint objectives that cannot be readily and specifically identified with a particular grant project or other institutional activity. These are typically widespread costs for support service activities, such as purchasing, budgeting, payroll, accounting, data processing and staff services. Indirect costs are usually charged to the grant as a percentage of some or all of the direct cost items in the grantee's budget. This percentage is called the indirect cost rate. The following expenditure functions are usually considered as indirect costs:
    - Function 2510 – Direction of Business Support Services
    - Function 2520 – Fiscal Services
    - Function 2570 – Internal Services
    - Function 2640 – Staff Services
    - Function 2660 – Data Processing Services"
- *Perkins*: Each EFE shall not use more than 5% of the allotment for administrative purposes; this includes both expenses in function code 2300 and indirect costs.

- *Direct vs. Indirect Costs:* An expenditure may not be assigned to the grant as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the grant as an indirect cost.

### Applicable Credits and Rebates

Applicable credits refer to those receipts or reduction-of-expenditure-type transactions that offset or reduce expense items allocable to the Federal award as direct or indirect costs. Examples of such transactions are purchase discounts, rebates or allowances; recoveries or indemnities on losses, insurance refunds or rebates; and adjustments of overpayments or erroneous charges. To the extent that such credits accruing to or received by the non-federal entity relate to allowable costs, they must be credited to the federal award either as a cost reduction or cash refund, as appropriate.

### Area Career Center Funding

Area Career Centers (ACCs) must receive, at a minimum, the portion of the CTEI grant allocation they generated. Perkins funding “shall be allocated to the area career and technical education school, the educational service agency, and the local education agency based on each school, agency or entity’s relative share of students who are attending CTE programs (based, if practicable, on the average enrollment for the past 3 years).” (Perkins V Section 131(e)(2))

### Benefits

From [ISBE’s State and Federal Grant Administration Policy, Fiscal Requirements, and Procedures](#):

- (Page 10) “The percent of employee benefits should reflect the percent of time the employee’s salary is charged to the program.” If benefits are included in the grant at a smaller percent than the employee’s salary, please include a statement of the entity covering the remaining benefit costs.
- (Page 68) Employee Benefits “apply to the same function number as the cost of the applicable salary.”

### Career and Technical Student Organizations (CTSOs)

- Allowable costs are:
  - Transportation for state competition and leadership conferences utilizing most cost-effective means;
  - Special Population state and national membership;
  - Student’s registration/fees for state and national competition and leadership conferences;
  - Chapter advisor state professional development;
  - Chapter advisor to attend national conference – *handle on a case-by-case basis*; and
  - New CTSO’s (chapter advisor) stipend that are not currently being paid for by other funding sources (e.g., local, state, etc.), as that constitutes supplanting and is not allowed.
- Not allowable costs are:
  - Student hotel costs;
  - Membership fees for students who are not special populations; and
  - Out-of-state travel for students, including CTSO events/competitions. More than 50 miles outside of the Illinois border constitutes out-of-state.

## Dual Credit/Dual Enrollment

Grants can pay dual credit costs for members of special populations only.

[Perkins V Section 135\(b\)\(5\)\(S\)](#) allows for support to reduce or eliminate 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.

## Emergency Technology for Remote Learning

CTEI and Perkins funds may be used to support CTE remote learning for FY 2021.

## Food

Food is:

- Not allowed in Perkins, unless it is travel meal reimbursement for professional development or an instructional supply in an approved CTE program.
- Allowed in CTEI as a travel meal reimbursement for professional development, an instructional supply in an approved CTE program, or if a professional development or meeting aligns with the following conditions:
  - Facing a genuine time constraint;
  - Limited to lunch;
  - Cost of the lunch must be reasonable;
  - The information presented during the lunch must be an important part of the agenda (working lunch);
  - Prepare carefully documented justification (written) for the working lunch and keep on file for auditing; and
  - No snacks or beverages.
  - This DOES NOT apply to lunches for students at all day events.

## Industry-Recognized Credentials/Certifications/Licenses

There is no cap on inclusion of industry-recognized credentials/certifications/licenses for approved programs that align to high-skill, high-wage, or in-demand industry sectors or occupations.

- CLNA stakeholders and existing advisory committees should provide guidance on which credentials/certifications/licenses to offer.
- Function code 2230 shall be used to record the cost of all student assessment and testing, including industry-recognized credentials, certifications, and licenses. The object code will be either 300 or 400, depending on the type of expense. The expenditure description must itemize the specific name and total cost of the assessment or testing for each credential, certification, or license paid for by the grant.
- If the credential is included as part of a curriculum fee, please ask the vendor to break out the percentage of the cost for curriculum (1000/300 or 1000/400) and the percentage for student credentialing or assessment.

## In-Person Events

ISBE is not directly sponsoring any in-person events currently. School districts who elect to plan for in-person events must follow the IDPH guidelines and their district guidelines. Grant funds may be used for regularly allowable in-person events that are implemented in compliance with the guidelines.

## Memberships, Subscriptions, and Professional Activity Costs

- CTE-related school district memberships in business, technical, and professional organizations are allowable.
- CTE-related organization subscriptions to business, professional, and technical periodicals is also allowable.
- Individual memberships are not allowable (CFR 200.454).

## Out-of-State Travel

- *Students:* Out-of-state travel for students cannot be included in either grant. This includes, but is not limited to, CTSO events/competitions, field trips, etc. More than 50 miles outside of the Illinois border constitutes out-of-state.
- *CTE Teacher (and other allowable roles) Professional Learning:* Related to the purposes of this grant will be allowed with ISBE approval, which should be obtained at least 30 days prior to the travel date. Such travel must be in accordance with written EFE System policy. Travel will be reimbursed at rates defined in this policy. Such travel records must be maintained at the local level for audit purposes.
- The following details must be included in the expenditure description and itemization textbox for out-of-state travel for CTE Teacher and other allowable roles: function attending, location, number of travelers, projected cost, date(s) of travel, and benefit to project.

## Professional Learning – Support for Teacher Master’s Degrees to Teach Dual Credit

- Funds to support teachers as they earn a master’s degrees are not an allowable expense.
- Perkins V outlines two specific areas where you should support educator professional growth. In [Perkins V Section 135\(b\)\(2\)](#), “provide professional development for teachers, faculty, school leaders, administrators, specialized instructional support personnel, career guidance and academic counselors, or paraprofessionals, which may include:”
  - “(2)(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;” and
  - “(2)(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 recipient determines that such evidence is reasonably available, evidence-based pedagogical practices.”

## Teacher Equipment

In previous grant years, teacher equipment was not an allowable expenditure. In light of virtual learning situations, swivel cameras or similar equipment that record a CTE teacher’s demonstration of technical skills for student learning are an allowable purchase for FY 2021. Additional teacher equipment purchases will be handled on a case-by-case basis. Please email these questions to your CTE grant consultant.

## Teacher and Teacher Aide Salary

- There are no teacher salary caps for CTEI.
- To pay for teacher salary with Perkins funding, the following conditions must be met:
  - The salary covered must be for a new position that was not in existence in the prior fiscal year.
  - This would include new positions that are added to an existing program or new programs.
  - The Perkins funds can cover the salary for a new position for a maximum of three years.
    - 3-Year funding maximums for teacher salary with Perkins funds for new positions:
      - Year 1: Up to 100% of salary
      - Year 2: No more than 66% of salary
      - Year 3: No more than 33% of salary
- CTEI and Perkins can continue to support teacher aides as in previous fiscal years.

## Work-Based Learning

In SFY 2021, teachers are required to have successfully completed the two cooperative education courses to teach cooperative education and/or work-based learning courses. Cooperative education courses will sunset after SFY 2021.

Beginning in SFY 2022, work-based learning courses will replace cooperative education courses in the course catalog. ISBE is developing a guidance document for work-based learning. ISBE will provide educators with new options for becoming qualified to teach work-based learning in SFY 2022. Individuals who currently qualify to teach cooperative education will be qualified to teach work-based learning but will need to participate in additional professional development.