

Top 5 Perkins Budget Request Red Flag Issues

DCTE budget request approvals must comply with the legislative rules attached to those funds. When considering a budget request, consider the following Top 5 Perkins budget request red flag issues. Rejected Perkins budgets result in processing delays and a significantly decreased likelihood of receiving your Perkins funded equipment prior to the start of the school year. It is recommended to evaluate each Perkins budget request for the following common red flags prior to including on the budget application:

#1- Supplanting

The Problem: The local district is required to provide equal support to CTE and non-CTE classes.

Examples:

- A district pays for ELA textbooks, yet wants Perkins funds to fund CTE textbooks.... That is supplanting. If a district sends non-CTE teachers to the TIE Conference but wants to use Perkins funds to send the CTE teachers to the TIE conference, that is supplanting.
- The district provides a variety of common classroom technologies (like a teacher laptop, projector, SmartBoard, etc.) to non-CTE teachers but is hoping to use Perkins funds to provide these for the CTE classrooms. That is supplanting.

The Filter: Does or has the district provided this or something largely similar to non-CTE teachers/classrooms?

If so-that...is supplanting. And, any request that uses Perkins funds to supplant local funds is not allowable.

#2- Consumable

The Problem: Consumable supplies *maintain* a CTE program instead of *improving it*. Perkins funds are intended to make transformational change and improvement to the CTE program!

Examples:

- Supplies that are 'used up'. Although a lot of great learning happens using supplies that must be 'used up' in the process, these simply are not allowable uses of Perkins funds based on Federal law.
 - *Common examples include: Welding rod, welding wire, steel, CO2 Cartridges, ink, toner, printer cartridges, 3D printing cartridges/filament, lumber, paper, plants, potting soil, band aids, health science first aid kit supplies/gloves/alcohol swabs, etc.*
- Things that are given to a student, then it is gone, out of the program. This is not allowed.
- Supplies are that used to create items that are then sold (even if for a profit to benefit the CTE program). This is not allowed.

The Filter: Does this request maintain the CTE program? Will the item(s) be used up? If so, grant reviewers will view it as consumable and will have no choice but to deny your budget application to ensure compliance with federal Perkins law. **Save time and avoid returned applications by leaving consumable supplies out of your Perkins budget application.**

#3- Direct Individual Benefit to Select Students

The Problem: Picking and choosing what students within the CTE program get financial support that directly benefits him/her is not allowable. Perkins supports CTE programs, not select individuals. Additionally, the law requires equal access to CTE programming for all students participating in CTE.

Examples:

- Your Perkins funds only go so far, so- you decide to purchase 10 ServeSafe certifications then offer it to the students you feel need it most. Picking and selecting individual students who will directly benefit from Perkins funds is not allowable.
IF... You pay for and provide the opportunity for all students in the class/program to complete the certification
THEN... the certifications are allowable because it is now a function of the CTE curriculum/program as a whole instead of selected individuals.

- Purchasing uniforms, equipment of supplies that become property of the student is not allowed.
- Purchasing supplies or equipment which will be made into something that is sold by or becomes the property of the student. That- directly benefits the student on an individual level and therefore is not allowed.
- Awards, recognitions, scholarships, tuition, memberships, etc. directly benefit only certain individuals and therefore is not allowed.

The Filter: Does the budget request *support only select individuals*? This is not allowed. Or, all individuals in the program as a whole? Which is allowed. Please clarify in your justification if a request will be for certain individuals or for all student enrolled in the course or program.

#4- Capital Improvement

The Problem: Nothing purchased with Perkins funds belongs to the local school district. In the event a district must close their CTE program(s)- all Perkins purchases must be and will be transferred to other approved CTE programs. Therefore, it is not allowable to spend Perkins funds on making structural changes, building buildings, or for capital improvements due to their lack of transferability.

Examples:

- A district wants to upgrade to a restaurant grade commercial kitchen and the new equipment will require increased electrical access and load capacities. While this is a great idea to modernize the program, Perkins simply cannot pay for the improvement of infrastructure such as electrical, moving of walls, installing plumbing, etc.
- A permanent lean-to greenhouse with a permanent foundation. Is the structure permanently attached to the building, permanent footings or concrete flooring? If so, although we recognize the addition would strengthen the CTE program, due to its reliance on the district's building and permanent nature- it would be considered a capital improvement.

The Filter: Is everything being requested able to be transferred to another district's CTE program with reasonable effort and successfully relocated at another CTE program *without losing functionality*? If so, **Then... consider the following-** Will the request be used to make permanent changes to an existing structure **OR** will the existing property's overall value increase **OR** the useful life of a structure be increased, **OR** will the existing building be adapted to have a new use? If any of these are 'yes' then the request risks being considered a capital improvement in the event of an audit.

#5- Weak Industry Connection

The Problem: CTE is about career preparation through industry driven programming and learning opportunities. The equipment, tools and learning opportunities should function and be the same as what industry professional use.

Examples:

- An Arts/AV program wants to buy video cameras and propose buying \$150 cameras, so all students can use one at the same time. Industry professionals are not using \$150 cameras. They are using professional quality DSLR cameras/video cameras with professional grade accessories. The cheaper cameras do not prepare students with industry skills therefore requesting high quality DSLR camera set-ups are the best and only approvable choice.
- Requesting to attend professional development that while is remotely connected to CTE or an industry, it is not directly aligned to CTE courses and programming offered to students. Seek out industry grade training aligned to the CTE standards you teach.
- Items which are used for hobbies or crafting projects. While these may be enjoyable to many for personal fulfillment, the equipment is not used by professionals in high wage, high skill or high demand occupations.

The Filter: What is industry doing? Do that. If the program is tightly aligned to CTE Standards and you're doing what industry is doing, you're on the right path. If in doubt, this is a great opportunity to connect with your advisory committee or connect with a local industry partner.

Have questions or need further clarifications? Contact your regional specialist or Kim.Roth@state.sd.us to discuss.