



Ohio

CARL D. PERKINS MONITORING GUIDELINES

OFFICE OF CAREER-TECHNICAL EDUCATION

Revised March 21, 2019

 **Ohio** | Department
of Education

Introduction

The Ohio Department of Education (ODE) is required to monitor local sub-recipients to assure compliance with fiscal and management requirements of the Carl D. Perkins Career Technical Education Act of 2006, federal and state legislation, rules regulation, and policy. The Carl D. Perkins grant monitoring process provides an opportunity to assess local performance, operations and challenges facing local recipients, and whether goals and objectives were met. This informs targeted technical assistance, and other activities to foster continuous improvement.

The Career-Technical Education (CTE) compliance monitoring process should not be confused with the Program Review Process. The Program review complements the CTE electronic compliance monitoring process through an on-line self-review. Ohio legislation (HB59) requires the Ohio Department of Education (ODE) and the lead district of each secondary Career-Technical Planning District (CTPD) to conduct an annual review for each career-technical education program (Career Pathways/Courses) within the planning district, which may be a four to five-year process.

Purpose of the Carl D. Perkins Act of 2006

The purpose of the Carl D. Perkins Act of 2006 is to develop more fully the academic, career and technical skills of secondary and postsecondary students who elect to enroll in career and technical education programs 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 high demand occupations in current or emerging professions.
2. Promoting the development of services and activities that integrate rigorous and challenging academic and career and technical instruction, and that link secondary education and postsecondary education for participating career and technical education students.
3. Increasing State and local flexibility in providing services and activities designed to develop, implement, and improve career and technical education, including tech prep education.
4. Conducting and disseminating national research and disseminating information on best practices that improve career and technical education programs, services, and activities.
5. Providing technical assistance that:
 - (a) promotes leadership, initial preparation, and professional development at the State and local levels;
 - (b) improves the quality of career and technical education teachers, faculty, administrators, and counselors.
6. Supporting partnerships among secondary schools, postsecondary institutions, baccalaureate degree-granting institutions, area career and technical education schools, local workforce investment boards, business and industry, and intermediaries.
7. Providing individuals with opportunities throughout their lifetimes to develop, in conjunction with other education and training programs, the knowledge and skills needed to keep the United States competitive.

Technical Assistance

For technical assistance on the monitoring process and the Electronic Compliance Tracking System (ECTS), please contact your assigned Education Program Specialist. Click [here](#).

Accessing the Electronic Compliance Tracking System (ECTS)

The Secondary Self-Assessment is a web-based application process. Users can access the online Compliance System through ODE's secure Web Portal. Click on the Secure Application for Enterprise (**SAFE**) link located at the top of the Ohio Department of Education's home page.

PERKINS MONITORING PROCESS GUIDELINES

The Perkins monitoring process is a three-step process consisting of the following steps: 1) submission of a self-assessment based on survey questions in the electronic compliance tracking system, 2) a telephone interview, and in some instances, 3) an on-site review.

One-third CTPDs will be selected for the monitoring process annually. The selected CTPDs will be notified by email, and will then be required to complete the Self-Assessment using the ECTS.

A district will be deemed in compliance if there is a satisfactory review. All required evidence must be uploaded in the CTE Compliance Tracking System. A noncompliant rating requires a recipient to develop a Corrective Action Plan and comply with Ohio's Five-Year Performance Plan and Section 135 of the Carl D. Perkins Act.

Failure to complete a self-assessment or submit the self-assessment by the established deadline will automatically result in an out of compliance finding for the CTPD and Administrative Field Service (AFS) will conduct an on-site review.

Step 1: Submission of survey questions in the ECTS

All districts being monitored must complete the following steps:

1. Access the electronic monitoring system, located through the SAFE account portal.
2. Complete all questions under the sections entitled **(A) Organizational Structure** and **(C) Financial Components**.
3. In the **Program Improvement Opportunities** section (B), complete **only** the items that match the strategies selected in the district's 2018 Comprehensive Continuous Improvement Planning Application (CCIP).

4. Collect evidence for all survey questions answered (steps 2 and 3), placing it in an electronic file for future reference. ***Important: The district is not required to submit evidence at this time.***
5. Submit the completed self-assessment to ODE by **November 1, 2019**. If a self-assessment is submitted after the deadline, an on-site review will be scheduled.
6. The AFS team will select 20% of CTPDs to participate in a full review. The CTPDs will be notified and directed, to upload available electronic evidence (step 4) into the electronic compliance tracking system. The deadline for submission is **December 2, 2019**.
7. Any questions concerning the process should be directed to your assigned Educational Program Specialist

During the Carl D. Perkins grant monitoring process, the AFS team will review the completed self-assessment, previous site visit reports, previous Corrective Action Plans, performance data, Perkins plan content in the CCIP, EMIS reports and any other relevant information.

STEP 2: TELEPHONE REVIEW

The telephone review is the second step of the monitoring process and will be conducted to seek additional information, supporting documentation or clarification of questions generated by the AFS team. (At this point, the CTPD may be required to submit additional supporting documentation).

STEP 3: ON-SITE REVIEW

Any district, whether deemed in compliance or not, may receive an on-site review. The on-site review selection criteria are as follows: (a) an on-site review is requested by a CTPD, or (b) the CTPD submitted a self-assessment after the submission deadline, or (c) the reviewer deems it necessary to verify or clarify any information provided in the self-assessment, desk review, or telephone interview.

If selected for an on-site visit, the district may be asked to provide additional evidence. The reviewer will consult with the district and provide a list of items required during the on-site visit. During an on-site review, the CTPD superintendent or designee, treasurer, and CTPD contact should attend and be ready to participate in the process.

FINAL STEPS

After completion of the monitoring process, the district superintendent and contact will receive an issues/conditions email notification via the electronic compliance tracking system. If no issues/conditions were identified, the process is complete. If there are findings of noncompliance, the CTPD must prepare a Corrective Action Plan (CAP) to address each category identified. The timelines and directions for completing the CAP will be included in the email notification.

Self-Assessment Questions

A. Organizational Structure (Required Questions)
<p>Question 1</p> <hr/> <p>Section: SEC.135. (b)(5)</p> <p>The CTPD's yearly operational plan (CCIP) was reviewed by stakeholders to address workforce need and performance indicators.</p> <p><input type="checkbox"/> A stakeholders meeting was held between July 1, 2018 - June 30, 2019.</p> <p><input type="checkbox"/> A sign-in sheet for stakeholder members, including their names, titles and the constituencies they represent is on file.</p> <p><input type="checkbox"/> Minutes reflecting a discussion of workforce need and Perkins performance measures is on file.</p> <hr/>
<p>Question 2</p> <hr/> <p>Section: SEC.135. (b)(5)</p> <p>An advisory committee meeting was held for each program in the CTPD for discussing performance, program quality, and workforce need.</p> <p><input type="checkbox"/> A meeting was held for each program in this school year July 1, 2018 - June 30, 2019.</p> <p><input type="checkbox"/> Sign-in sheets for each program with advisory committee members, their names, titles and the constituencies they represent is on file.</p> <p><input type="checkbox"/> Discussion of technical skill attainment and placement, as well as workforce need, are reflected in the minutes for each program.</p> <hr/>
B. Program Improvement Opportunities
<p>Provide evidence for <i>only</i> the boxes you have selected on the CCIP application.</p>
<p>Question 1</p> <hr/> <p>Section: SEC.135(b)</p> <p><input type="checkbox"/> Dedicate at least 3% of the grant amount to "support for learner success" activities, including assessment and intervention services.</p> <p>Required evidence:</p> <p>Documentation in the form of a purchase order(s) or position description(s) is on file. Provide a brief explanation of how federal Perkins funds were utilized to accomplish this section.</p>

Question 2

Section: SEC.135(b)(1)

Strengthen academic career and technical skills through academic/technical integration and Programs of Study implementation.

N/A

Required evidence:

Documentation in the form of a purchase order(s) or position description(s) is on file.

Provide a brief explanation of how federal Perkins funds were utilized to accomplish this section.

Question 3

Section: SEC.135(b)(2)

Link secondary and postsecondary education.

N/A

Required evidence:

Documentation in the form of a purchase order(s) or position description(s) is on file.

Provide a brief explanation of how federal Perkins funds were utilized to accomplish this section.

Question 4

Section: SEC.135. (b)(3)

Provide experience and understanding of an industry.

N/A

Required evidence:

Documentation in the form of a purchase order(s) or position description is on file.

Provide a brief explanation of how federal Perkins funds were utilized to accomplish this section.

Question 5

Section: SEC.135(b)(4) (A)(B)(C)

Develop, improve or expand the use of technology.

N/A

Required evidence:

Documentation in the form of a purchase order(s) or position description(s) is on file.

Provide a brief explanation of how federal Perkins funds were utilized to accomplish this section.

Question 6

Section: SEC.135. (b)(5)(A)(i)

Provide in-service and pre-service professional development.

N/A

Required evidence:

Documentation in the form of a purchase order(s) that evidences professional development activities is on file.

Provide a brief explanation of how federal Perkins funds were utilized to accomplish this section.

Question 7

Section: SEC.135. (b)(7)

Evaluate programs/assess impact on special populations.

N/A

Required evidence:

Documentation in the form of a purchase order(s) or position description(s) is on file.

Provide a brief explanation of how federal Perkins funds were utilized to accomplish this section.

Question 8

Section: SEC.135. (b)(8)

Initiate, improve, expand and modernize quality programs.

N/A

Required evidence:

Documentation in the form of a purchase order(s) or position description(s) is on file.

Provide a brief explanation of how federal Perkins funds were utilized to address this section.

Question 9

Section: SEC.135. (b)(6)

Provide effective services in size, scope and quality.

N/A

Required evidence:

Documentation in the form of a purchase order(s) or position description(s) is on file.

Provide a brief explanation of how federal Perkins funds were utilized to accomplish this section.

Question 10

Section: SEC.135. (b)(9)

Prepare special populations for economic self-sufficiency.

N/A

Required evidence:

Documentation in the form of a purchase order(s) or position description(s) is on file.

Provide a brief explanation of how federal Perkins funds were utilized to accomplish this section.

C. Financial Components

Perkins funds are used to supplement, not supplant, programs/activities. Support from any other funding must not duplicate funding received from the Perkins Act.

Question 1

Section: OMB Circular A-87 (8) (3)(4)

Time and Effort documentation is on file for every employee paid partially or completely with federal Perkins Funds.

N/A

Required evidence:

A position description for each employee **partially or fully** paid using Perkins funds is on file.

A work log for each employee paid partially from more than one Federal source is on file.

A semi-annual verification document for each employee paid fully out of Perkins is on file.

Question 2

Section: 34 CFR Part 80.32

A system is in place for tracking the purchase, location, and disposal of equipment purchased using federal Perkins Funds is on file.

N/A

Required essential evidence:

A tracking documentation sample.

Question 3

A budget ledger report detailing Perkins expenditures is on file.

Required essential evidence:

FY2019 Budget Ledger (BUDLED) Report that includes all Perkins expenditures.

Question 4

Section: SEC.135. (b)

Please check only the "**Permissive Uses of Funds******" that were checked as strategies on the application page of your CCIP. (Evidence for those checked boxes is on file.)

N/A

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- Promote stakeholder involvement in design, implementation and evaluation of CTE Programs.
 - Provide career guidance and academic counseling.
 - Promote education and business partnerships.
 - Provide programs for special populations.
 - Assist in career and technical education student organizations.
 - Provide mentoring and support services.
 - Lease, purchase, and upgrade equipment.
 - Prepare teachers, including candidates from business and industry.
 - Develop and expand postsecondary program offerings, including distance education.
 - Develop initiatives that facilitate the transition of sub-baccalaureate career and technical education student into baccalaureate degree programs.
 - Support entrepreneurship education and training.
 - Develop or improve curriculum, particularly for high skill, high wage or high demand occupations.
 - Develop and support career-themed learning communities.
 - Support family and consumer science education.
 - Provide programs for adults and school dropouts to complete secondary education.
 - Provide services for placement in employment and further education.
 - Support nontraditional training and employment.
 - Support automotive technologies training.
 - Pool a portion of funds with a portion of funds from other eligible recipients for innovative measures.
 - Support other CTE activities that are consistent with the purpose of this Act.

**FY2020-FY2022 Carl D. Perkins Monitoring Districts
Secondary**

FY2020		FY2021		FY2022	
Secondary		Secondary		Secondary	
CTPD #	CTPD	CTPD #	CTPD	CTPD #	CTPD
089	Alliance City SD	095	Akron City SD	003	Ashland County-West Holmes JVSD
052	Auburn JVSD	001	Apollo JVSD	004	Ashtabula County JVSD
101	Buckeye JVSD	024	Bedford-Maple Heights City SD	037	Tolles Career & Technical Center
055	C-TEC	006	Belmont-Harrison JVSD	015	Columbiana County JVSD
090	Canton City SD	008	Butler Technology & Career Development Schools	108	Coshocton County JVSD
115	Canton Local SD	035	Columbus City SD	071	Dayton City SD
120	Centerville City SD	027	Cuyahoga Valley JVSD	016	East Liverpool City SD
043	Cincinnati City SD	036	Eastland-Fairfield Career & Technical Schools	032	EHOVE JVSD
019	Cleveland Municipal SD	030	Four County JVSD	044	Great Oaks Institute of Technology
031	Delaware JVSD	054	Lawrence County JVSD	042	Greene County Career Center
021	East Cleveland City SD	002	Lima City SD	050	Jefferson County JVSD
096	Four Cities Educational Compact	058	Lorain County JVSD	051	Knox County JVSD
040	Gallia-Jackson-Vinton JVSD	081	Madison Local SD	119	Lancaster City SD
117	Greenville City SD	066	Medina County JVSD	063	Mahoning County JVSD
053	Lake Shore Compact/Mentor Ex Village	067	Meigs Local SD	078	Maplewood Career Center
057	Lorain City SD	075	Mid-East Career & Technology Centers	092	Massillon City SD
072	Mad River Local SD	116	Millstream Career & Technology Center	073	Miami Valley CTC
082	Mansfield City SD	059	Oregon City SD	074	Morgan Local SD
025	Mayfield Excel TECC	039	Penta County JVSD	056	Ohio Hi-Point
107	Ohio Valley Local	083	Pioneer CTC	084	Pickaway-Ross CTC
026	Parma City SD	038	South-Western City SD	077	Pike County JVSD
028	Polaris JVSD	011	Springfield-Clark County JVSD	093	Stark Career Compact (Plain Local SD)
033	Sandusky City SD	060	Sylvania City SD	098	Portage Lakes JVSD
007	Southern Hills JVSD	111	Tri-Rivers JVSD	086	Scioto County JVSD
094	Stark County Area JVSD	012	U.S. Grant JVSD	097	Six District Educational Compact
005	Tri-County JVSD	069	Upper Valley JVSD	070	Switzerland of Ohio Local SD
020	Tri-Heights Career Prep Consortium	085	Vanguard-Sentinel JVSD	061	Toledo City SD
099	Trumbull Career & Technical Center	102	Vantage Career Center	121	Tri-Star Career Compact
064	Youngstown City SD	104	Washington County JVSD	103	Warren County JVSD
		062	Washington Local SD	105	Wayne County JVSD
				023	West Shore Career Technical Education District
	Total: 29		Total: 30		Total: 31

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Guidelines for Compliance with Perkins IV Regulations

***It is important to remember that Perkins funds are used to supplement, not supplant state and local funds for CTE activities.

One of the goals of Administrative Field Services is to provide recipients with technical assistance support concerning Perkins-related issues. Please consult with your education program specialist if you have questions. The following guidelines have been developed as a quick reference:

Secretarial & Administrative Costs

Administration is defined as “activities necessary for proper and efficient performance of eligible agency or eligible recipient’s duties under this act.” The definition further stipulates that administration includes supervision but does not include curriculum development activities, personnel development, or research activities.

Five percent of your total Perkins dollars can be designated for this purpose. Secretarial and clerical support and any supplies associated with administrative functions should be funded from this five percent administrative allotment.

Examples of secretarial and administrative costs include clerical support staff, supervisors, and directors.

Salaries and Benefits

Salaries and benefits may be paid to a CTE counselor, a substitute teacher while the teacher is attending professional development, or as a stipend to a teacher serving as a CTSO advisor. A teacher initiating a new program in an emerging program area may qualify as an allowable expense for a **maximum of three years**. Academic or ongoing teacher salaries are not allowable expenses.

Student Incentives/Awards

The intent of the Perkins legislation is to “develop more fully the academic and career and technical skills of secondary education students and postsecondary education students.” Perkins allocations must be used to fund career-technical programs, not individual student activities, efforts or outcomes. It is not permissible to use Perkins money to fund student incentives, awards, membership fees, or to pay stipends for student employment.

Supplies

Instructional supplies and materials may be purchased using Perkins funds. Examples of allowable expenses include minor equipment such as tools, gloves and other safety gear. Upgrading technology, such as Smart boards, software, computers, etc. may also be allowable, provided they do not exceed \$4,999 per unit.

Student Organizations

Perkins permits the use of grant funds to support Career-Technical Student Organizations (CTSO) and related activities if the CTSO is an integral part of a career-technical program. Funds can be used to purchase supplies or equipment for the organization or to fund activities if the activity is made available to all students in a

program without regard to membership in the CTSO. Perkins funds cannot be used to pay for individual student membership, contest participation fees or associated student travel costs such as transportation, food, clothing, or accommodations. Teacher expenses, such as travel, professional dues, and stipends may be paid out of Perkins funds.

Promotion/Marketing

Marketing and promoting career-technical and adult programs through publications and advertisements is a permissible use of Perkins funds. **Allocations for these purposes should be reasonable considering the law's intent.** Promotional materials such as coffee mugs, pens, rulers, T-shirts, thumb drives, or other items of personal property are not an allowable expenditure under Perkins.

Equipment

Equipment must be *essential* to develop the students' occupational skills. Every school district should have an approved definition of equipment. If there is none, the federal definition is as follows:

Equipment is defined as a tangible, nonexpendable, personal property having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit.

A district may define equipment with a lower minimum acquisition cost, such as \$500 or \$1,000. Digital cameras and projectors may be classified as equipment, provided they are used for CTE students and programs.

Items of a consumable nature are classified as supplies, not equipment. Primary textbooks are not a permissible expense, but books purchased as supplemental resources may be permissible.

Furniture is generally not considered equipment, unless it is specific to training for a particular career field. Examples of permissible expenses in the furniture category would be a barber's chair or a medical bed. The purchase of desks, filing cabinets, shelving, etc. is not a permissible use of Perkins funding.

Contact Information

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