

Memorandum

Date: 4/29/14
To: CTE Coordinators
From: Sharon Wendt
Subject: CTSO Expenditures

The U.S. Department of Education, Office of Vocational and Adult Education (OVAE) issued Non-Regulatory Guidance in 2009 that provided States with further information to implement the Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV). Part of this guidance included information about the use of funds for Career and Technical Student Organizations (CTSOs). Specifically, the following question and answer was included regarding CTSO expenditures:

D. 26 May Perkins IV funds be used to support student transportation to, and lodging and meals at, technical skill competitions as part of national career and technical student organization (CTSO) conventions?

Answer: No, except in certain limited circumstances as described in the last paragraph of this answer. The Department's long-standing interpretation regarding the types of CTSO costs that may be paid from Federal grant funds is that Perkins funds used for the support of CTSOs may not be used for lodging, feeding, conveying, or furnishing transportation to conventions or other forms of social assemblage.

Perkins funds may be used for these types of direct assistance if the costs are (1) related to a CTSO that is an integral part of the curriculum, and (2) part of a larger program to serve special populations or nontraditional students.

Meeting requirement #1 –Integral part of the curriculum

According to the U.S. Dept. of Education, an “integral part of the curriculum” includes activities that are being supervised by career and technical education personnel who are qualified in the occupational area and are available to all students in the instructional programs without regard to membership in a student organization.

Meeting requirement #2 – Part of a larger program to serve special pops or NTO students

Outlined in the non-regulatory guidance is more information about how Perkins funds may be used to provide direct assistance to special populations students. See question D.27 of the Non-Regulatory Guidance as it relates to Direct Assistance to Students. You will note that direct assistance to individuals who are members of special populations does not, by itself, constitute a “program for special populations” that meets the requirements of section 124(b)(8) or 135(c)(4) of Perkins IV. Furthermore, direct assistance to individuals preparing for non-traditional fields, does not by itself, constitute training and employment activities in non-traditional fields under section 124(b)(5) or 135(c)(17) of Perkins IV.

As you can see the burden of proof to meet both aspects of this guidance is difficult. Because it is unlikely that CTSO activities meet these requirements, **we are not allowing any 2014-15 Perkins grant funds to be used on student level CTSO activities.**

We have also had some questions regarding non-CTSO student organizations activities and allowable Perkins funding. Per a clarification email from USDE, this guidance includes non-CTSO technical skill competitions as well (i.e., ProStart, First Robotics, etc.).

Perkins funds may be used for the CTSO advisor if it is related to professional development and meets all other federal funding requirements.

Also, when considering when to expend Perkins funds on any activities, you should carefully consider whether the activity is:

- Necessary and reasonable
- Allocable to the grant
- Supplanting is not occurring

I understand that several of you requested to use Perkins funds for CTSO activities and/or non-CTSO technical skill competitions in your 2014-15 Perkins applications. DPI Perkins grant reviewers are identifying these areas of the budget and will be requesting that you eliminate any Perkins funding for CTSO student travel and redistribute those funds to other allowable expenditures.

We apologize for the late notice, but with the additional clarification by USDE we must implement the non-regulatory guidance as other states have been doing.

If you have any questions, please feel free to contact Roselynn Bittorf, CPA Grant Specialist at roselynn.bittorf@dpi.wi.gov or 608-266-3922.