

C16 – Local Plan Revision

PROCESS POINT GUIDANCE

Purpose: To make changes to an approved Local Plan by submitting a Local Plan Revision.

Overview: A Local Plan Revision may be submitted by opening an approved Local Plan for revision and editing the approved Local Plan. It may be submitted to the CCCS Perkins Plan Manager any time during the fiscal year, but revisions must be submitted prior to April 1st. In addition to the variance instances noted below, any time activities not initially included in the Local Plan are anticipated, a revision is required. Revisions to the Perkins Local Plan should be submitted and approved prior to obligating any grant funds. It is important that the Local Plan be reconciled to actual costs on a regular basis. This will better allow full use of all the annual allocation. It will also help prevent a Local Plan variance report. A variance report is triggered if the recipient:

- Spends 10% of the allocation amount or \$25,000, whichever is smaller, in a manner different than what was originally budgeted at the spending category level (personnel, equipment, other, travel) and/or
- Spends 10% of the allocation amount or \$10,000, whichever is smaller, within one action step that is in a manner different than what was originally described and budgeted and/or
- Makes an equipment purchase that was not previously approved and/or
- Spends funds on out-of-state travel without approval of all required details. (See below for May 1 exception regarding out-of-state travel.)

Since Perkins funds are a federal grant, it is expected that thoughtful, strategic planning was incorporated to develop the original Perkins Local Plan and therefore, revisions would rarely be needed. Strategic use of Perkins funds should entail sufficient size, scope and quality action steps toward reaching accountability objectives within assorted projects. Applying the principles of enhancement and supplemental use of these funds should prevent the need for extensive revisions. Perkins Local Plans represent deliberate approaches toward improving Career and Technical Education programs through quality management support. However, it is understood that situations change so revisions are allowed. Excessive or frequent revisions can be an indication of poor grant development, poor grant management or both. However, it is best to keep the Local Plan reconciled to actual costs on a regular basis. Some programming errors may occur if Equipment actual costs are not reconciled prior to voucher reimbursement requests of that equipment. Lack of early and frequent reconciling to actual costs can cause the recipient to not use the fullest possible total allocation amount. The first and easiest step of Local Plan Revisions is to use strategic planning processes and project management techniques.

Note: It is strongly recommended that the Perkins Local Plan reflect actual costs and actual purchases prior to May 1. It is also best practice to make any revisions to action steps to reflect actual purchases PRIOR to requesting reimbursement of those costs. (General action steps for in-state travel, substitute teachers can be requested for reimbursement before all needs in these action steps are completed.)

Note: In some cases, out-of-state travel details are not available by May 1st. For out-of-state travel details that are not available until after May 1st, contact the Perkins Plan Manager or designee to open the Local Plan for the revision. Be sure to submit out-of-state travel revisions early enough to meet the requirement of Local Plan Approval with out-of-state travel details at least 15 days prior to travel.

Note: The recipient must be cautious regarding issuing purchase orders for items late in the fiscal year. Items purchased with Perkins funds must be received, on site, by June 30 of the fiscal year.

Process Point: This guidance covers the UPDATES/REVISIONS phase of the Local Plan process.

Technical/Online System Guidance:

www.coloradostateplan.com/wp-content/uploads/2015/03/C16_LocalPlanRevision_TechGuide_021709.pdf

NON-TECHNICAL GUIDANCE

Budget / Local Plan Revisions

The last date to submit a budget revision is April 1st. With only three months remaining in the fiscal year, it is assumed that the recipient has finalized all details of their Funded Projects' action steps. Updating the Local Plan is important in order to prevent a budget variance. A budget variance could occur when the final voucher is submitted and actual costs reported are different than what was included in the Local Plan.

It is possible that planned costs not obligated until May or June come in under budget. If these saved funds are not spent, the recipient loses these saved funds for the fiscal year. Therefore, some minor purchases of items not in the Local Plan may occur late in the fiscal year. However, the following parameters must be considered:

If the local recipient spends 10% of the allocation amount or \$25,000, whichever is smaller, in a manner differently than what was originally budgeted at the spending category level (personnel, equipment, other, travel), reimbursement of non-articulated purchases are at risk of being denied. If the local recipient spends 10% of the allocation amount or \$10,000, whichever is smaller, in a manner differently than what was originally budgeted within one action step, reimbursement of non-articulated purchases are at risk of being denied.

More importantly, if the local recipient purchases equipment that was not approved prior to issuance of a purchase order, reimbursement will be denied.

If the recipient requests reimbursement for out-of-state travel and the details have not been added to the Perkins Local Plan and the Local Plan approved at least 15 days prior to travel, travel cost reimbursement requests may be denied. (See Appendix B for complete details.)

Due to the extensive programming requirements that would be needed to calculate variance thresholds prior to receiving a variance report, all revisions that are submitted, even minor actual cost updates, require CCCS approval to return the Local Plan to the "Local Plan Approved" status. All Perkins Local Plans should be in the "Local Plan Approved" status before submitting a final voucher.

After making revisions to an approved Local Plan and before submitting the revised plan for review, the recipient needs to list the revisions made, by Funded Project name or number and Action Step number, in the revisions summary box next to the “SUBMIT” button. This helps assure that new action steps will be reviewed for allowability. If a revision is made but never listed in the summary box, it could be a denied reimbursement later. Summarizing each revision also allows CCCS to quickly review revisions and return the Local Plan status to “Local Plan Approved.”

On occasion, especially with out-of-state travel, some revisions are necessary after April 1st. The CTE Online Account freezes the revisions link in the plan after April 1st but provides a link to e-mail the Perkins Plan Manager or the CTE Service Manager. Send this e-mail requesting CCCS to open your Local Plan for revisions. This e-mail must include the Local Plan Reference Number, the reason for the need for a late revision, why the revision was not submitted prior to April 1, and a summary description of the revision that needs to be submitted. CCCS reserves the right to reject a request for opening a Local Plan for revision after April 1 based on:

- A. non-emergency or insufficient justification for a late revision or,
- B. a revision that demonstrates supplanting or,
- C. a revision involving unallowable expenses, or
- D. a revision involving expenditures that could not be completed by June 30 of the current fiscal year.

CCCS reserves the right to deny reimbursement for purchases submitted for reimbursement on final vouchers that are not included in the Local Plan based on:

- A. Purchase causes the budget variance to exceed the variance threshold described above or,
- B. Purchase is not an allowable Perkins expense or,
- C. It is not clear how the purchase supports the recipient’s Funded Projects’ objectives or,
- D. Purchase represents supplanting of non-federal funds.

Although the recipient is ultimately responsible for costs of unallowable purchases, a purchase without the review that occurs with Local Plan submittals, means that the recipient could be at greater risk of possible unallowable expenses.

C18 – Equipment

PROCESS POINT GUIDANCE

Purpose: To provide a suggested process local recipients can use to provide additional information and request reimbursement after equipment has been purchased. Equipment purchases require prior approval and follow-up information through the CTE Online Account system.

Overview: The Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, defines certain requirements for pre-approval of equipment purchases and equipment tracking. The equipment information step provides a mechanism for local recipients to provide the CCCS Grant Accountant with detailed transaction information, once an equipment purchase has been completed and reimbursement is being requested.

Note that federal laws define equipment as a single unit with a useful life of greater than one year and an acquisition cost of greater than or equal to \$5,000.

Acquisition cost of equipment means the net invoice price of the equipment, including the cost of modifications, attachments, accessories, or auxiliary apparatus necessary to make the property usable for the purpose for which it was acquired. Other charges, such as the cost of installation, transportation, taxes, duty, or protective in-transit insurance, shall be included or excluded from the unit acquisition cost in accordance with the recipient's regular accounting practices. (2 C.F.R. § 200.33 and 200.2)

Purchase orders for equipment should not be issued until the equipment is included as an Equipment spending category action step within an APPROVED Local Plan relevant to the year of the purchase and receipt of the equipment.

Technical/Online System Guidance:

Regarding initial planning for equipment as part of a funded project.

http://www.coloradostateplan.com/wp-content/uploads/2015/03/C10_FundedProjectsInformation_TechnicalGuide_012511.pdf

Part 5.d. for Technical/Online System Guidance regarding claiming reimbursement for equipment in a voucher: http://www.coloradostateplan.com/wp-content/uploads/2015/03/C20_Vouchers_Technical-Guide_010815.pdf

NON-TECHNICAL GUIDANCE

The Perkins designated contact should review and approve all purchase orders being charged to Perkins. This is especially important when an item in the Local Plan was estimated to cost less than \$5,000 but the requisition reflects costs equal to or greater than \$5,000. If that situation occurs, the requisition should not be approved and forwarded until AFTER the Local Plan is revised and APPROVED with the relevant action step changed to an "Equipment" spending category and the cost corrected.

It is also necessary in the reverse. If an item is listed in an approved Local Plan as equal to or greater than \$5,000 and thus listed as an "Equipment" spending category, yet the requisition indicates a cost less than \$5,000, the Local Plan should be revised and approved with the relevant action step changed to an "Other" spending category and the cost corrected.

No revisions can be made to Equipment Action Steps if the equipment is already included in a voucher claiming reimbursement for that unit. The Local Plan equipment action step needs to match the submitted voucher equipment information.

Disposal of Equipment

Occasionally, Perkins recipients no longer need equipment that was funded or partially funded with Perkins monies. No items purchased with Perkins funds should be sold without consulting the CCCS Perkins Plan Manager for procedural guidance. Equipment that met the definition of equipment at the time of acquisition needs to be currently valued before disposal; transfer or trade-in. Documentation of the current fair market value of the equipment must be submitted to the CCCS Perkins Plan Manager and must be maintained by the recipient.

- If the item has a current fair market value that equals or exceeds \$5,000, the recipient needs CCCS approval to proceed. The equipment information form should be updated with the disposition details.
- If the item's current fair market value is less than \$5,000, the recipient may dispose of, transfer or trade-in the item without CCCS approval. However, the recipient should NOT SELL any Perkins funded items without guidance from the CCCS Perkins Plan Manager. Documentation evidencing the current fair market value must be maintained by the recipient.

Although not required, if a local recipient is ready to part with Perkins purchased equipment or any other items that may still be useful to a CTE program, the State encourages the giving of items to another CCCS approved CTE program. If assistance is needed with this process, please contact the CCCS Perkins Plan Manager by e-mail, describing the items. CCCS can forward this information to all local Perkins recipients and request a response to the original recipient by the recipient interested in the items. The receiver of the items is responsible for the cost of transporting the items.

If any Perkins funded equipment is stolen, the local recipient needs to advise the CCCS Perkins Plan Manager. This advisement must include a copy of the police report.

Perkins funded items that were less than \$5,000 for the total unit, at the time of purchase, and, thus, do not meet the definition of equipment, can be disposed of without CCCS approval. HOWEVER, it is strongly recommended that all Perkins funded items are recorded on a spreadsheet that includes columns of: Reason for disposal; how it was disposed; and date of disposal. If any Perkins funded items are stolen, a police report must be filed and documentation of that report kept on file.

NO items purchased with Perkins funds should ever be sold without consulting with the CCCS Perkins Plan Manager for procedural guidance.

Appendix B: Perkins Grant Travel Policy

Research indicates that one of the most effective strategies for improving education is to provide professional development opportunities to teachers, faculty, administrators and other support staff who serve students. Often professional development opportunities involve travel costs including event registration costs, mileage or airfare, lodging, meals and other travel related expenses.

As good stewards of tax dollars, it is important that travel costs are relevant, reasonable, documented in detail and completely transparent. Without detailed documentation, travel to Las Vegas for a professional conference could easily be misperceived as a pleasure junket. So it is very important with all costs, but especially true with travel costs, to have consistent and reliable internal controls.

Travel expense source documents should reflect, at a minimum, the following information: Traveler's name and title, purpose of the trip and how it relates to Perkins, dates of travel, location, and event details. The travel should be approved by someone who has supervisory authority over the traveler. Consistency should apply whether paying by per diem or for receipts for meals and should follow the recipients travel policy. Perkins funds cannot be used to pay for any alcoholic beverages so, if the recipient reimbursement policy is to use receipt documentation, detailed receipts are necessary, not just totals.

Event details provide information that can help an administrator decide whether the event fits within the Perkins strategies, performance metrics and the local mission and vision. For example, a trade show usually only offers technical workshops and would not be a location to send faculty who need more development in the area of teaching methods. A trade association conference rarely provides workshops about recruiting and retaining the underrepresented gender into a career field educational program. If the performance metrics are not meeting targets for non-traditional career enrollments and completions, the recipient may want to send this teacher to a different conference. Conversely, a teacher who needs updated technical skills may gain more benefit from a trade-related conference than an education-related conference. Remember, CTE teachers need both kinds of skills: content and teaching/learning methods.

Checking an event programs allows the recipient to direct teachers toward specific sessions that would add value within the overall priorities and enables the recipient to determine if any of the registration costs are funding continuing education credits or "teacher-owned" certifications, licenses or credentials. These "personal benefit" costs should not be paid with Perkins funds. Including copies of conference programs as part of the expense source documents enhances the validation and justification for the travel expenses.

Any travel funded by Perkins should be justifiable within the strategic plan of Perkins and should be reviewed for how its alignment with the overall vision for CTE before it is submitted for state approval.

Perkins funds cannot be used for lobbying; therefore it is important that travelers using Perkins funds for travel to Washington D.C. not engage in lobbying activities. Colorado does not allow the use of Perkins funds for travel to the ACTE policy seminar for this reason. Colorado has also elected not to allow Perkins funds for out-of-country travel.

Travel costs that span two fiscal years such as the state CTE educator conference in July must be included in two years' Local Plans if paid for using Perkins funds in order to follow federal guidance for the period of obligation. For example, registration costs may be paid in year one (current year) to take advantage of an early bird rate as long as the travel/registration is included in the current year's Local Plan. Unless it is possible to cancel registration and receive a full refund, registration is considered obligated at the time it is completed. That is when the hosting organization accepts your institution's commitment to send a person to the event. To be allowable, the registration must be both obligated and show on the institution's general ledger system for the same fiscal year in which the funds were obligated (year 1 in this example). Travel costs through June 30 would also be permitted in the first year's Local Plan.

Travel costs that occur in the next fiscal year (July 1 or later) such as hotel, mileage, and per diem may not be included in the current year's plan. Those costs are obligated at the time the travel occurs and may be included in the second year's Local Plan and paid for using Perkins funds as long as the Local Plan is submitted in substantially approvable form prior to the travel occurring. As with all travel, reimbursement for trips crossing fiscal years is contingent upon plan approval. Trips that are bundled and advertised for one all-inclusive price should be itemized if possible, to ensure that pre-payment of costs such as lodging and food are not paid for in year one. If there is an issue with this, please contact the Perkins Plan Manager for further guidance.

This same procedure would apply to out-of-state travel that spans multiple years as well. For out-of-state travel, ALL required travel details would be required to be included in the Local Plan at the time of submission for the travel to be an allowable use of Perkins funds.

At the state level, for Local Plan Perkins funding purposes, CCCS separates travel into the following categories:

DESCRIPTION OF TRAVELER(S)	EXTENT OF TRAVEL	PRE-APPROVAL BY CCCS THROUGH THE CTE ONLINE SYSTEM REQUIRED AND EXTRA INFORMATION NEEDED
Personnel: faculty, teachers, administrators, etc.	In-state	Should be a logical action step within a Funded Project that addresses the first project objective in the Funded Project where the travel action step description is located.
Personnel: faculty, teachers, administrators, etc.	Out-of-state	<p>**Specific details must be approved at least 15 days prior to departure:</p> <p>Name & website of event, location, dates, how travel improves CTE programs, and how travel helps address performance metrics.</p> <p>The action step description should specify how the event provides professional growth and how it supports the first Project Objective of the Funded Project where the action step description is located.</p>

Students	Field Trips	Travel needs to occur within the school day timeframe and should include a classroom type activity (assignment, report, fact-finding worksheet, reflection paper, etc.)
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**There are 2 exceptions to these requirements:

1. Some Perkins local recipients are geographically located near one of Colorado's four borders. If a border recipient is expensing travel, by car, to a border state, out-of-state travel approval is not required unless the travel is beyond 300 miles, one way.
2. For out-of-state travel that will be taken between July 1 and December 31 -- IF the travel details are in the Perkins Local Plan prior to departure, we will not require a minimum 15 day advance approval. This 15 day requirement can ONLY be waived IF THE FOLLOWING STEPS ARE TAKEN:
 - a. The travel details are submitted in the Perkins Local Plan prior to departure.
 - b. All the required travel details are included in the Local Plan the FIRST time you submit the Local Plan.
 - c. Last minute requests for out-of-state travel will be denied.

Note: Perkins funds may not be used for out-of-country travel.

Note: Perkins funds may not be used to fund student travel costs to CTSO activities.

Appendix C: General Allowable & Unallowable Perkins Costs and Activities

Allowable Costs/Activities	Unallowable Costs/Activities
<p>*Administrative Costs Advertising to recruit personnel Advisory councils Audit costs in accordance with the Single Audit Act (OMB Circular A-133)</p> <p>Career guidance and counseling Communication costs (telephone, postage, fax, etc.) CTSO competitive events faculty / chaperone travel (not recommended) Education programs for personnel to stay current with all aspects of industry **Equipment for instruction (includes leasing, purchasing, upgrading, adapting) Employee morale, health, and welfare costs *Indirect Costs</p> <p>Legal expenses for administration of the Perkins award</p> <p>Maintenance, operations and repairs</p> <p>Materials and supplies Meetings and conferences to provide or gain technical information directly relevant to the grant Membership in business, technical, and professional organizations Mentoring and support services Personnel costs (salaries, wages, and fringe benefits) Professional and consultant services Professional development/training</p> <p>Publication and printing costs</p> <p>Rental costs of buildings and equipment **Scholarships and student aid costs for special populations **Specialized service facilities Student assessment costs to assess pre/post performance and growth Subscriptions to business, technical, and professional periodicals Travel Costs (**Out-of-state travel)</p>	<p>***Accreditation Costs ACTE policy seminar Activities for students younger than 7th grade Advertising and public relation costs (includes memorabilia and displays) Alcoholic beverages Alumni/ae activities Bad debts (losses from uncollectable accounts) Capital expenditures (general purpose equipment, buildings, land improvements) Cash Equivalents (i.e. gift cards)</p> <p>Commencement/convocation costs Contingency provisions Contract/award with suspended and debarred parties (see Administrator's Handbook) CTSO competitive events student travel Donations and contributions Entertainment (amusement and social activities) Expenditures that supplant (see Administrator's Handbook for definition) Fines and penalties Fundraising Goods or services for personal use (including gifts) Greenhouses Housing and personal living expenses for faculty Incentive for business relocation Labor relations costs Legal expenses for criminal proceedings and claims against the federal government Lobbying Losses on other sponsored agreements or contracts Membership in civic or community organizations Membership in country club, social, or dining clubs Membership in lobbying organizations Pre-award costs Program costs for CCCS approved Middle School level CTE Programs Religious worship, instruction, or proselytization Student certification costs unless as part of an assessment development process Travel out of the country</p>

* The aggregate "direct administrative and indirect costs" cannot exceed 5% of the allocation; the indirect cost portion cannot exceed the recipient's negotiated rate. WIOA Infrastructure costs paid by postsecondary recipients may not exceed 5% of the grant and would reduce the funds available for direct or indirect administrative costs.

** Expenditures only allowable after pre-approval by the Perkins Plan Manager through the Local Plan or direct approval.

*** Accreditation costs may be allowed in rare circumstances – contact Perkins Plan Manager for further discussion.

Note: All costs must relate to approved high school and postsecondary Career and Technical Education programs and the students, teachers, and administrators they serve.