



Missouri Department of Elementary and Secondary Education

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PROGRAM MEMORANDUM

TO: Administrators of Perkins Grants

FROM: Tom Quinn
Assistant Commissioner
Division of Career Education

DATE: September 1, 2009

SUBJECT: #2009-04 – Guidance Related to Perkins Allowable and Unallowable Costs

One of the goals of the Division of Career Education is to provide local educational agencies (LEAs) with clear guidance concerning all Perkins-related issues. As part of that effort, Division staff has met over the past year to discuss and clarify a couple of items that are noted on the Perkins Basic Grant and Tech Prep Grant - Allowable/Unallowable Costs list. The need for the clarification of these items was a direct result of some concerns noted during the Perkins Technical Assistance Visits (TAVs) conducted by the Division.

During the meetings held by staff regarding these allowable and unallowable costs, it became apparent that the Division needed to provide LEAs with some written guidance on the matter. The discussions involved the appropriate use of Perkins funds as those expenditures conform to the intent of the Perkins Legislation. In addition, during the U.S. Department of Education's (USDE) monitoring of the Division's Perkins grant, this information was reviewed and discussed again. The USDE staff agreed with the information and indicated that it supported the USDE's interpretation of the Perkins Legislation. As a result of these discussions, the Division now provides the following guidance for reference as each LEA begins to prepare for Year 3 under Perkins IV.

This new guidance must be adhered to by all LEAs receiving a Perkins grant to ensure the appropriate use of funds. This guidance will be effective on **July 1, 2010**.

Guidance Related to Professional Development for Personal Benefit

While the Perkins Act allows for funds at the local level to be used for professional development activities for educators (faculty and administrators), it is not the intent of the law for LEAs to use Perkins funds to pay for costs that result in a personal benefit of the educator.

Therefore, the following costs are not allowable:

- college course tuition for educator certification
- college course tuition for educator licensure
- college course tuition for an educator to obtain a degree or college credit with the following exception: New Teacher Institute
- exam fees for educator certification or licensure

Reasonable uses of professional development funds would be for activities such as workshops where technical information is disseminated to educators that help improve career and technical education (CTE) programs (i.e. strategies to align academic and CTE curriculum).

Guidance Related to Allowable and Unallowable Food Costs

Expenditures on food must be *reasonable in cost, necessary to accomplish program objectives, and an integral part of the instructional program*. If the Division determines that a subgrantee expended Perkins grant funds on food costs that are not reasonable or necessary to meet the intent and objectives of the Perkins grant, the Division reserves the right to restrict the subgrantee from expending any funds on food costs or to disallow expenditures on food costs.

Food Costs for Participant Meetings/Trainings

Unless otherwise specified by the Division, a limited amount of funds may be expended on meals for participant meetings or training events. The use of Perkins grant funds for this purpose is specifically limited to meals which are noted on an agenda, clearly described and mandatory.

Specifically, Perkins grant funds may be expended for the following costs provided that the subgrantee maintains adequate and sufficient documentation that the costs were necessary and reasonable to further the intent and objectives of the Perkins grant.

- ***Meals During a Meeting or Training Session:*** The purpose of the meal should be to shorten the overall meeting or training time and to facilitate accomplishing the objectives of the meeting or training and the overall program. The subgrantee must maintain an agenda that clearly identifies the topics discussed during the meeting or training session and the time allocated to each topic, including the meal period. Also, the subgrantee must maintain a list of attendees or have all participants signature on a “sign-in” sheet. Only a nominal amount of grant funds may be used per participant. For example, the Department’s meal maximums for employees are \$10.00-breakfast, \$12.00-lunch and \$18.00-dinner.
- ***Working Lunch During an All-Day Meeting or Training Session:*** A working lunch is defined as an activity in which participants are engaged in exercises or activities during the normal meal time. The subgrantee must maintain an agenda that shows that no other opportunity for a meal was provided and that clearly identifies the exercise or activity the participants were engaged in. Also, the subgrantee must maintain a list of attendees or have all participants signature on a “sign-in” sheet. Only a nominal amount of grant funds may be used per participant. For example, the Department’s meal maximums for employees are \$10.00-breakfast, \$12.00-lunch and \$18.00-dinner.

Unallowable Food Costs

The following costs are not allowable:

- refreshments or meals at banquets, award ceremonies or goodwill gestures
- refreshments or meals for parents or students with the following exceptions: career/employer/job fairs or parents who are members of an advisory committee
- refreshments or meals at meetings including only staff members
- refreshments or meals at special employee events (picnics, retreats, holiday and birthday parties)

If you have any questions regarding this guidance, please contact Andy Martin, Director of Career Education Finance, at (573) 751-0449 or Sandy Withers, Assistant Director of Career Education Finance, at (573) 522-1487.