

# Perkins V Allowable and Unallowable Costs

Academic Year 2024-25

## Allowable Costs

- Administrative costs (up to five percent)
- Advertising to recruit career and technical education (CTE) instructors and personnel (*Do not use "marketing."*)
- Advertising to recruit non-traditional and [special populations](#). [Prior Approval Form](#) is required.
- Advisory committee expenses (*Meals and snacks are ineligible.*)
- All Curriculum for Agricultural Science Education (CASE) program start-up materials and supplies (consumables with a first-time purchase) are eligible if taught by a CASE-certified instructor. (*CASE instructor certification costs are ineligible.*)
- Comprehensive Local Needs Assessment (CLNA) development and evaluation off-contract stipends.
- Computers must exceed technological specs used for school district-funded devices, for purposes of accommodating software needs: gaming, CAD, complex 3D models, computer science software, Adobe Suite/Photoshop, Microsoft Office. [Seek prior approval.](#)
- Conference registration and travel expenses for CTE staff (*Individual membership dues are not eligible.*)
- Equipment
  - All equipment must be inventoried. See [Inventory Template](#).
  - \$500 threshold for secondary school districts
  - \$5,000 threshold for postsecondary school districts
- Equipment training fees
- Games that allow for simulation and situational learning
- Industry-recognized credentials (students only)
- Installation costs required to meet code requirements for CTE equipment purchased. [Seek prior approval.](#)
- Instructional materials (*Supplemental only, workbooks and consumables are ineligible.*)
- Interactive Panels: Promethean, i3TOUCHX2, Smart Whiteboards, Interactive Touch Panels. (*Fiscal Year 2025 is the last year these items are eligible, with supplanting beginning July 1, 2025.*)
- Kits (reusable only). Institution assumes cost to replace consumable workbooks after the first set of workbooks. (*Consumable kits (robotics, horticulture, etc.) are ineligible for reimbursement.*)
- Maintenance, repair and service contracts on CTE equipment purchased with Perkins funding, to keep in an efficient and operating condition
- Middle school CTE (See Perkins V [Middle School Prior Approval Form.](#))
- Off-contract pay for CTE staff
- Professional development provided for internal school district or community college staff – mileage and materials
- In-state and out-of-state professional development (registration, airfare, parking, ground transportation, hotel, mileage, meals, baggage)
- Printers, limited to Stratasys, MakerBot, 3D, blueprint-large format, new and emerging technology. (*Ink jet and laser printers are ineligible.*) [Seek prior approval.](#)

- Program evaluation development and off-contract pay for CTE staff
- Project Lead the Way (PLTW) equipment and supplies, if taught by a PLTW-endorsed instructor. (*PLTW instructor certification costs are ineligible.*)
- Rentals and leases (welding tanks, technology contracts).
- Stipends for non-contract days
- Substitute teacher pay for CTE staff who are out of the office to attend conferences and professional development events
- Student assessment and certification fees (e.g., CNA, CMA, OSHA 10, HVAC, Serve Safe, Sanitation)
- Textbooks for new courses with new competencies

## Career and Technical Student Organizations (CTSO)

### CTE Staff Reimbursements:

An advisor or instructor must be CTE endorsed and licensed by the Iowa Board of Educational Examiners for all of the following costs to be eligible for reimbursement with federal Perkins dollars:

- **Institutional affiliations, both chapter and school district:** Request [CTSO Guide](#) for obtaining eligible invoices. *Individual membership dues are ineligible. Invoices with more than one membership listed, that list “student memberships” or “instructor/advisor memberships” or are submitted with student names are not eligible for reimbursement.*
- **Salaries, stipends, off-contract or extra-duty pay under the following conditions:**
  - The position has always been funded by Perkins.
  - The advisor or instructor is hired to lead a newly implemented CTSO that has not existed in the current or previous program year.
  - *Note: CTSO advisors or instructors currently advising or receiving remuneration with another funding source may not be moved into, or paid by, Perkins funds (supplanting).*
- **CTSO Supplies:**
  - Instructional materials, professional clothing, blazers. Items that stay with the CTSO.

### Student Competitor Reimbursements

Competitors only, *student attendee costs are ineligible.*

- **In-State:** Registration, travel, hotel and meals
- **Out-of-State:** Airfare, mileage, taxi, hotel, meals, registration, baggage and parking.
- *Note: School districts are required to have a policy in place and documentation on file that ensures costs are reimbursed for student competitors only.*

## Unallowable Costs

- Capital expenditures (facilities, HVAC, permanent structures, immobile greenhouses). [Seek prior approval](#).
- Career Information Systems (e.g., IHAPI, Kuder, Xello). May not be purchased as “supplemental curriculum” for secondary and postsecondary programs (supplanting).
- Commencement and graduation costs
- Consumable items (consumable kits, paper, CO<sup>2</sup> cartridges, batteries, toner, food, varnish, wood, shelving, storage, welding gasses)
- Marketable credentials, endorsements, certifications and degrees for CTE staff (See page five.)
  - Career and Technical Education (CTE) authorizations
  - College credit coursework
  - Continuing education units
  - Multioccupations coordinator/work-based learning program authorization
  - PLTW and CASE certification
  - Teaching licenses
  - Train-the-trainer certifications (OSHA)
  - Work experience coordinator
- Entertainment, tickets to sporting events
- Furniture. All classroom furnishings are ineligible for reimbursement (supplanting). School district assumes responsibility for tables, chairs, desks (including mobile whiteboard desks and tables), benches, ergonomic workspaces, sectionals, end tables, carpet, lamps, lighting, workstations and area rugs. Furniture will not be approved as “equipment.”
- Gifts, raffles and door prizes, promotional materials (t-shirts, pens, cups, key chains)
- Individual student and instructor memberships to professional organizations or CTSOs
- Insurance
- Items retained by students (blazers, uniforms, jump drives, t-shirts)
- Marketing costs of student-run businesses, student activity costs, clubs
- Meals (meetings, student camps, professional development or advisory meetings)
- Memberships (individual instructor, staff, student) in CTSOs or professional organizations
- Newspaper subscriptions
- Textbooks for existing courses (unless the curriculum is “supplemental”)
- Transportation for students
- Vehicles including: automobiles, trailers, trucks, buses, airplanes, boats, golf carts, snowmobiles, motorcycles, heavy equipment, backhoes and skid loaders. [Seek prior approval](#) for electric vehicle training programs.

## Supplanting

Perkins monies may be used as a first-time funding source for new CTE initiatives, equipment, salaries, institutional memberships, conferences, in- and out-of-state travel, CTE program costs, off-contract pay, CLNA and program evaluation costs. However, if at any time the above costs are *paid for with non-federal funding sources*, the costs may not be paid for with Perkins monies in subsequent years. This rule applies to all Perkins expenditures.

Supplanting has occurred when the school district or community college:

- Was **required** to make the item available under **other federal, state or local law** (e.g., career information system IHAPI, Kuder, Xello, etc. or OSHA or other safety requirements), or
- Purchased the same or similar item(s) or service(s) with **non-federal funds in the prior year**.

School districts and community colleges *may not exclude* CTE students, programs, courses or classrooms from purchases of the same or similar item(s) and service(s) purchased for non-CTE students, programs, courses or classrooms.

## Examples of Supplanting

- Computers and computer monitors
- Food
- Furniture
- Document cameras (Elmos)
- Headphones
- Ink-jet and laser printers
- Monitors
- Projection equipment
- Storage (plastic bins, shelving, totes, storage racks, lockers)
- Technology cables as independent purchases (HDMI, VGA, splitters, extension cords)
- Transportation
- TVs and smart TVs
- Utility carts
- Vacuums
- Vending machines
- Whiteboards and whiteboard tables and chairs

## Capital Expenditures

Capital expenditures are any improvements to buildings and land that add value to the property. Federal funding sources (Perkins) may not be used to fund capital expenditures. Permanent structural (including permanent greenhouses) and wiring upgrades, buildings, concrete slabs and land, accommodation upgrades, safety rails, ramps and guards are considered capital expenditures per EDGAR e.C.F.R. 200.43

## Marketable Credentials and Licensing

*Marketable credentials and licensing are Perkins ineligible.* Both supplant and are referred to by the federal Office of Career and Technical and Adult Education (OCTAE) as “harming the federal interest.” The funding formula in Perkins statute is based on geographic and socioeconomic data sets that determine the allocation percentage each Iowa institution receives. Perkins-funded credentialed staff are in short supply, and easily drawn to affluent districts able to pay higher salaries. When those Perkins-funded credentials leave with the staff member, the funds leave the institution they were intended to serve. This situation violates the purpose and intent of the funding formula in statute.

## Industry-Recognized Credentials for CTE Students

School districts and community colleges may use Perkins funding to award CTE students “industry-recognized certification examinations or other assessments leading toward a recognized postsecondary credential” (Perkins Activity Five, Subsection G).