



# STATE OF IOWA

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DEPARTMENT OF EDUCATION  
RYAN M. WISE, DIRECTOR

DATE: October 25, 2017

TO: Perkins Contacts and Business Managers

FROM: Pradeep Kotamraju, Ph.D.  
Bureau Chief, Division of Community Colleges and Work-force Preparation, Bureau of Career and Technical Education

SUBJECT: Perkins Claims Team and Reimbursement Updates  
LEA use of federal funds for Computing Devices and Peripherals

In academic year 2016-2017, the Iowa Department of Education, Bureau of Career and Technical Education (CTE) reorganized from regional consultant assignments to a team-based service model.

One objective of the team approach is to implement standardized processes that are applied consistently. The five teams established, include the:

- Grant Approval Team;
- Program Approval Team;
- Monitoring Team;
- Technical Assistance Team; and,
- Claims Team.

In academic year 2016-2017, the claims team focused on providing regulatory consistency in the application of supplanting restrictions, based on the [Carl D. Perkins Act of 2006 language P.L. 109-220 Title III, Part A, Sec. 311 \(a\)](#) and the May 28, 2009 memo that supports the supplanting restrictions entitled, "[OVAE non-regulatory guidance, D-22](#)".

Upon review of the process implemented in academic year July 1, 2016 through June 30, 2017, the CTE Bureau has determined the following:

Recipients submitting claims for computing devices and most peripherals, regardless of the funding source in prior years, will be eligible for reimbursement as long as:

1. The "Perkins contribution to the reimbursement is consistent with the proportional amount of time that the devices are used for CTE programs" (e.g., computing device purchased with Perkins appropriations are used primarily for CTE activities and CTE students . and,
2. The devices are *upgraded versions* of purchases previously acquired from non-CTE funds and are now given priority to CTE programs, CTE activities, and CTE students. And then for non-CTE activities.

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3. RPP's and Perkins secondary and postsecondary funds may be used interchangeably without creating a supplanting issue. This is allowable if the plans for all three entities support the same initiatives, outcomes, and/or goals. The supplement versus supplant rule does not apply to Regional Planning Partnership (RPP) expenditures even where Carl Perkins funds were previously used for the same eligible items (professional development, career guidance, and equipment).
  - The only provision is the local Perkins plan and the RPP plan must identify the expenditure alignment in each of their respective plans.
  - Note: the exception is, if school districts were previously using non-Perkins or non-CTE funds on RPP eligible items, then it is likely the supplement versus supplant rule applies, but there may be exceptions. Please check with the Department prior to committing RPP funds.
- Claims for meals, provided for attendees of Perkins related meetings are ineligible expenditures and will **not** be approved for reimbursement (See [Appendix C](#) of Perkins FAQ);

It should be noted that the above information was drafted after Iowa received guidance from the US Department of Education, Office of Career, Technical and Adult Education (OCTAE).

Finally, eligible secondary, postsecondary, and RPP recipients should be familiar of the code of federal regulations § 200.403 Factors affecting allowability of costs of the federal Uniform Grants Guidance (UGG) which requires that, for a cost to be allowable, it must be consistent with the policies of the state. Thus if the state has a more restrictive rule, the sub recipient must follow it (an example of § 200.403 is that federal guidance requires that all equipment that costs \$5,000 or more must be entered into inventory, while the Iowa Perkins Policies and Guidelines requires that all equipment that costs \$500 or is considered "easily pilfered" must be entered into inventory).

The eligibility revisions are based upon:

- 2016 updates to the Education Department Guidance Administrative Regulation [EDGAR], and,
- Consultation with Iowa's federal CTE Perkins contact in Washington D.C.
- The [Iowa Perkins State Plan](#), updated in 2013, referencing equipment, including "information technology".

This determination is effective immediately for all purchases made on or after July 1, 2017.

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