



IOWA

Department of Education

Ann Lebo, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

DATE: January 24, 2022
TO: Perkins Contacts and Business Managers
RE: Career Information System (CIS) Platform Perkins Eligibility

The purpose of this memorandum is to update Perkins contacts and business managers concerning the eligible use of Perkins funds for the purchase of Career Information System (CIS) platforms (Kuder, Xello, IHAPI, etc.).

After review and consultation with the US Department of Education, Office of Career, Technical and Adult Education (OCTAE), it should be noted that Federal Perkins funds may no longer be used to purchase a CIS for use by both CTE and non-CTE students, including renewals of a CIS previously purchased with Perkins. See updated [Allowable and Unallowable Costs](#).

The use of Federal Perkins funds to purchase CIS Platforms for CTE and non-CTE students in grades PreK-12 creates a supplanting issue and is ineligible under the following statute and compliance supplement:

*The Strengthening Career and Technical Education for the 21st Century Act
2 CFR Part 200, Appendix X1 Compliance Supplement, Executive Office of the President,
Office of Management and Budget (OMB), July 2021.*

In the following instances, it is presumed that supplanting has occurred if:

- a. The State Education Agency (SEA) or Local Education Agency (LEA) used federal funds to provide services that the SEA or LEA was required to make available under other federal, state or local laws.
- b. The SEA or LEA used federal funds to provide services that the SEA or LEA provided with non-federal funds (or for Title III, Part A. other federal funds, as noted below) in the prior year.
- c. The SEA or LEA used Migrant Education Program (MEP) funds to provide services for participating children that the SEA or LEA provided with non-federal funds for non-participating children.

The Bureau of Career and Technical Education continues to focus on providing regulatory consistency while maintaining compliance with federal requirements. Supplanting issues

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discovered at the state level must be immediately addressed and brought into compliance at the local level. Secondary districts and community colleges may review CIS purchases with their respective regional planning partnership (RPP) to determine if RPP funds are available for these purchases.

Questions may be addressed to Amy Vybiral amy.vybiral@iowa.gov (Perkins), Jane Bradley jane.bradley@iowa.gov (RPP) or Dennis Harden dennis.harden@iowa.gov.