

# Perkins Disallowable Costs Guidance

This document is intended to provide guidance on often requested, but unallowable purchases under Perkins. It is not an exhaustive list. The eligibility of any cost should be determined by considering the grant's purpose, Carl D. Perkins requirements, and any pertinent Federal cost guidelines. All costs must be related to the program as approved in the local Perkins application.

| Disallowable Expenditure                         | Additional Detail  | Exceptions   |
|--|--|--|
| Audits   | The cost of a general school/institution audit is not permissible.   | Portion of the audit directly attributed to auditing the Perkins grant may be charged against the 5% administration category.  |
| Awards   | Examples:<br>- Cash Awards<br>- Medals/Pins<br>- Plaques<br>- Ribbons<br>- Trophies/Certificates   | No exceptions  |
| Basic Tools                                      | Basic hand tools that are not considered industry grade are not allowable.   | Industry grade tools (high grade, high resiliency)   |
| Capital Expenditures                             | Building construction, modification (includes plumbing, electrical wiring, heating/cooling systems, etc.) or land purchases  | Equipment based on eligible purpose and need are allowed (e.g. plasma cam for a welding program)   |
| Career & Technical Student Organizations (CTSOs) | Examples:<br>- Awards for recognition of students, advisors or other individuals<br>- Individual dues (student or advisor)<br>- Food and lodging for students<br>- Jackets/uniform apparel<br>- Registration fees to events, conferences and other activities<br>- Supplies<br>- Transportation of students to CTSO events | Affiliation plans that enable all students enrolled in a cluster program to participate in CTSO is allowable. These plans provide access to CTE instructional materials and resources for all students participating in the approved program, and also include student and advisor memberships as an additional benefit. |
| College Prep Tests                               | As a direct benefit to students, college preparation test are not allowed.   | No exceptions  |
| Competitive Events                               | Funding to transport students to and from competitive events is considered direct assistance to students and therefore not allowable.  | No exceptions  |

**Allowable Uses of Funds:** See Section 135 in Perkins Act for Required and Permissible Uses of Funds. In general, funded activities must improve the quality of approved programs, enhance instruction, and align with industry standards. Items must supplement and not supplant local funds.

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| Construction or Renovation Costs             | Construction costs and materials for a permanent structure or anything that becomes a <i>part of</i> a permanent structure are not allowable.   | No exceptions   |
| Consumable Supplies (Not an exhaustive list) | <p>All standard classroom consumable supplies, including but not limited to:</p> <ul style="list-style-type: none"> <li>- CO2 cartridges</li> <li>- Drill bits</li> <li>- Food</li> <li>- Ink, toner, printer cartridges</li> <li>- 3D printer filament</li> <li>- Lumber</li> <li>- Office supplies (e.g., markers, glue, shears, card stock, paper)</li> <li>- Plants and potting soil</li> <li>- Welding rods/wire</li> </ul> <p>* Any item that can be made into something that can be sold or become personal property is not allowed.</p> | Specialized items may be allowable if expenditure does not supplant local funds.  |
| Contingency or "Petty Cash" Funds            | Contingency is part of a budget estimate of future costs which is associated with possible events or conditions arising from causes that are indeterminable at the time of estimate. These will likely result in additional costs for an activity or project. Contingency costs are not allowable.  | No exceptions   |
| Contributions/Donations                      | Federal funds cannot be used as contributions or donations of any form.   | No exceptions   |
| Direct Assistance to Students                | <p>Examples:</p> <ul style="list-style-type: none"> <li>- Certifications</li> <li>- Childcare</li> <li>- Dual credit costs</li> <li>- Fees</li> <li>- Lodging</li> <li>- Meals</li> <li>- Individual Memberships</li> <li>- Textbooks or Workbooks</li> <li>- Tools or equipment</li> <li>- Transportation</li> </ul>   | Exceptions may be available students in identified special populations (i.e. pregnant or single parents, economically disadvantaged, English learners, disabled students, nontraditional students, displaced homemakers) in CTE programs. Permission is required. |

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| Distance learning fees   | Funding that provides a direct benefit to students is not allowable (see Direct Assistance to Students).   | Exceptions may be available for students in identified special populations. Permission is required.  |
| Dues/Membership Fees   | Memberships to organizations that actively lobby are not allowed.<br>E.g. ACTE is an organization that actively lobbies for CTE.   | Memberships to industry recognized entities may be allowed if the entity is not a lobbying organization and the benefit provided is not to an individual but to a CTE program. Permission is required. |
| Entertainment  | Expenditures for entertainment or social activities such as:<br>- Beverages<br>- Lodging<br>- Meals<br>- Non-working meals<br>- Transportation<br>- Gratuities                                       | There is a high burden of proof to justify the expenditure of Perkins funds for a meal - see Meals.  |
| Equipment<br>(for administrative or personal use)                      | Expenditures for equipment that is not specifically used for approved career and technical education courses/programs of study and housed in appropriate classrooms/labs/workshops is not allowable. | Equipment used for Career Guidance.  |
| Equipment and Supplies for Building Maintenance                        | The cost of supplies and equipment for building maintenance is not allowable.  | No exceptions  |
| Equipment that is mounted or becomes a part of a building or structure | The cost of equipment that is mounted or part of a building is a capital outlay expense and not permissible with Perkins funds.  | Exceptions may be made and depend on the item, how it is installed, and if it becomes a permanent part of the facility.  |
| Expenditures that Supplant Local Effort                                | Federal funds cannot be used to provide the same services an entity has been providing with non-federal funds (see supplanting).   | No exceptions  |

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| Facilities   | Construction, remodeling, rewiring or line installation, or anything permanently affixed to a building   | No exceptions   |
| Fines and Penalties  | Cost for fines and penalties are not permissible with federal funds.                                     | No exceptions   |
| Furniture  | Standard classroom furniture not unique to instruction is unallowable. (See also supplanting)            | Perkins funds can only be used for specialized items unique to instruction of content (i.e. mobile light carts for plants) or to provide reasonable accommodations to CTE students with disabilities.   |
| Gifts, Door Prizes, etc.   | See promotional items  | No exceptions   |
| Hobby Craft, Leisure Arts, or other Non-Occupational Item Expenditures | Hobby craft, leisure arts and other non-occupational expenditures are not allowable.                     | Perkins funds can only be used for items that modernize, improve or expand CTE and align to industry standards and expectations. Items must be used for courses that enhance instruction for students to gain knowledge and skills that meet industry standards and certifications in high wage, high skills and high demand occupations. |
| Industry Certifications  | Perkins funds may not be used to pay for an individual certification for students or teachers            | Perkins funds can only be used if certification work and tests are provided to all students in the class. (Ex. OSHA 10-hour Safety Certification for all students in a class).  |
| Installation fees  | Costs for installing items to connect to a building, modification of a building, or capital expenditures | No exceptions   |

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| Instructional Aids to be retained by students | Federal funds cannot be used to purchase any items that will be retained by students.   | No exceptions   |
| Insurance                                     | Building, equipment or personal/institutional insurance is not allowable  | No exceptions   |
| Interest or other Financial Costs             | Interest and other financial costs may not be charged to the grant.   | Only approved indirect costs may be charged to the grant by the recipient and must be based on the entities approved indirect cost plan. Administrative and indirect costs cannot exceed 5% of the grant. |
| Kitchen Tools                                 | Residential type kitchen tools are not allowable (e.g., light-grade plastic products, private label products sold through home party outlets)   | Industry grade tools are allowable (high grade, high resiliency)  |
| Leasing Vehicles or Equipment                 | Renting or leasing of automobiles, trucks, buses, airplanes, boats, golf carts, motorcycles, tractors, or trailers is not allowable   | No exceptions   |
| Maintenance Contracts or Agreements           | Capital outlay and maintenance costs are not allowable.   | No exceptions   |
| Makerspaces                                   | Perkins funds cannot be used for Makerspaces that are not aligned with CTE programs and do not have a career development focus. Perkins funds cannot be used for programs prior to the 7 <sup>th</sup> grade. | Perkins funds can be used for Makerspaces that are aligned with CTE programming and are focused on career exploration.  |
| Meals   | Banquets and meals are considered entertainment expenses.   | Working lunches that are essential to the meeting and the agenda reflects that work is taking place are permissible.  |

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| National Career Readiness Certificate (NCRC) Assessments | The cost of NCRC assessments is not allowed as the assessment is provided at no cost to 11 <sup>th</sup> and 12 <sup>th</sup> graders with state funds. The cost of retaking an assessment would be a direct benefit to a student and not allowable. | No exceptions  |
| Non CTE-Focused/CTE-Based Conferences                    | Conferences that do not connect CTE classroom instruction with industry or career development, improve instruction, or integrate technology are not allowable.   | Perkins funds can only be used if the district does not provide funding for registration and travel for other individuals in the district to attend the same conference using local funds. |
| Non-CTE Courses or Activities                            | Expenditures for students not enrolled in CTE courses  | No exceptions  |
| College Prep Tests                                       | As a direct benefit to students, college preparation test are not allowed.   | No exceptions  |
| Postsecondary Fees                                       | Fees for postsecondary tuition for teachers and students are not allowable.  | No exceptions  |
| Pre-7th grade  | No funds can be used to provide career and technical education programs to students prior to the 7th grade.  | No exceptions  |
| Printers   | Standard printers are not allowable.   | Specialized printers that are aligned with industry uses and are relevant to program content may be allowed.   |
| Promotional Materials                                    | Examples:<br>- Cups/glasses<br>- Folders<br>- Gratuitous items<br>- Key chains<br>- Pens/pencils<br>- Posters<br>- T-shirts  | No exceptions  |
| Remedial Courses   | Costs for remedial course work are not allowed with Perkins funds.   | No exceptions  |

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| Repair Expenditures                             | Repair costs of any item are not allowable with federal funds.  | No exceptions   |
| Replacement of Lost, Stolen or Broken Equipment | The cost of replacing federally funded equipment that is lost, stolen or broken is the responsibility of the grant recipient.   | No exceptions   |
| Residential Grade Equipment                     | Equipment MUST be industry grade, quality and demonstrate the most recent technology within the category. Examples of unallowable residential grade equipment include: <ul style="list-style-type: none"> <li>- Electric ranges (Low end, coil burner)</li> <li>- Washers/dryers</li> <li>- Dishwashers</li> <li>- Pressure canners</li> <li>- Food dehydrators (unless they are industry grade)</li> <li>- Sewing machines (unless industry grade and tied directly to a Fashion Design course)</li> </ul> | Only industry or commercial grade equipment is eligible   |
| Scholarships                                    | Scholarships provide a direct benefit to students and thus are disallowable.  | No exceptions   |
| Software for Use Outside the CTE Classroom/Lab  | Instructional materials, software or equipment that is used in hobby, craft or leisure arts courses are not approvable for reimbursement.   | Software is only approvable if it is for use in career and technical skill enhancement directly tied to the CTE program of study (with alignment to content standards) and directly to instruction in the classroom/laboratory/workshop. (Ex. Chief Architect, Solid Works) |
| Software - Standard operating software          | Standard operating software that is used throughout the district for multiple purposes (e.g., Microsoft Office, Adobe - Standard)   | No exceptions   |

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| Storage Files or Cabinets              | Standard multi-purpose furniture is not allowable.  | Specialized storage items may be allowed, e.g. fire proof cabinets to store flammable paint in a shop where welders are present.                         |
| Student Assessments                    | Individual student assessments that are specific to each student are not allowable (e.g. Strength Finders).<br><br>Assessments that are required to be made available by local, state or federal laws are not allowable due to supplanting  | Assessments may be allowable if a test is provided to the entire class and part of an industry certification tied to the CTE course or program of study. |
| Subscriptions to Magazines or Journals | Subscriptions that are non-technical and cannot be tied directly to a CTE program of study or instruction are not allowed.  | Subscriptions are only allowable if the content is technical and tied directly to the CTE program of study and instruction of CTE program.               |
| Supplanting                            | 1. Using Perkins funds to provide services the recipient is required to make available under other federal, state or local laws<br>2. Using Perkins funds to provide services the recipient provided with state or local funds in the prior or previous years<br>3. Using Perkins funds for CTE students while using local funds for the same service to non-CTE students | No exceptions  |
| Tests                                  | Tests that directly benefit a student or are required to be made available by local, state or federal laws are not allowable due to supplanting   | Tests may be allowable if the test is part of an industry certification that is provided to the whole class as part of the CTE course instruction.       |
| Textbooks & Workbooks                  | Hard copy textbooks and workbooks are not allowable.  | Online or internet subscriptions of text and curriculum content are allowable if federal funds are not used to supplant local funds.                     |
| Travel Outside of the U.S.             | Costs for travel outside of the U.S. are not allowable.   | No exceptions  |

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| Tuition Costs                         | Any tuition fee charged for students or teachers to attend a course or professional advancement is not allowable since it is a direct benefit.                   | Conference registration fees for teachers to attend a professional development workshop, seminar or conference are permissible if the content applies to the CTE program of study.   |
| Tutoring                              | Tutoring is not allowable if the district provides tutoring services in other content areas as supplanting would occur.  | A tutor could be hired to work with CTE students if the district does not pay for tutors in other content areas.<br><br>A consultant could be hired to work with teachers on enhancing academic content and rigor in CTE coursework. |
| University/Technical Institute Visits | Funding that provides a direct benefit to students is not allowable (i.e., a district cannot furnish travel for a limited number of students to visit a campus). | Expenses for CTE students to attend field trips or tour postsecondary institutions are allowable.<br>Ex. All students in a health science class visit a technical institute's health programs.                                       |
| Uniforms                              | Uniforms or any clothing that becomes a personal possession is not allowable.  | Uniforms or clothing including lab coats, coveralls, gloves, etc. that will remain in the classroom or laboratory are allowable.   |
| Vehicles                              | Renting or leasing of automobiles, trucks, buses, airplanes, boats, golf carts, motorcycles, tractors, or trailers is not allowable.                             | No exceptions  |

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