

Perkins and Work-Based Learning

Overview

Starting with the 2024-2025 fiscal year, Work-Based Learning (WBL) will be an exemption to the Universal course rule for the use of Perkins funds. School systems may use Perkins funds for Work-Based Learning as an exemption as long as fiscal requirements, application requirements, and student eligibility are met.

Fiscal Requirements

In order to use Carl Perkins Funds for Work-Based Learning, the following guidelines must be met:

- **Supplement not Supplant**
Before using Perkins funds, please discuss with your finance department to guarantee that [supplanting will not occur](#). State funds generated by the course enrollments must be exhausted prior to utilizing state funding.
 - **Career Development Funds (CDF)**
 - School systems must first use all CDF funds generated by the course enrollment towards the WBL activity.
 - **CTE 6%**
 - School systems must first use all CTE 6% funds generated by the course enrollment towards the WBL activity.
- **Allowable Expenses**
 - All expenses must meet the basic cost considerations of necessary, reasonable, and allocable as outlined in the Uniform Grant Guidance (UGG).
 - Perkins funds must be used for additional costs not covered by the employer, such as instructor/support staff salaries, student transportation, student uniforms, etc.
 - LDOE must approve all expenses requiring the use of Perkins funds. For guidance on purchases, please refer to the [Perkins Allocability Flowchart](#).
 - Perkins funds **cannot** be used to pay students.

Carl Perkins Application

- **[Comprehensive Local Needs Assessment \(CLNA\)](#)**
 - WBL must be defined as a need in the CLNA.
- **Super App Narrative**
 - WBL must be described in the application's corresponding narrative questions. The narrative must clearly describe how CTE 6%, CDF, and other funds are braided to cover the cost of WBL.
- **Super App Budget**
 - WBL activities/expenses funded by Perkins must be directly aligned to a Perkins approved cluster and program of study.
 - The budget description must state “work-based learning Universal Course exemption”.
 - WBL activities/expenses not aligned to Perkins approved clusters and programs of study must be covered by other funds such as CTE 6% or CDF.

Student Eligibility

- School systems must determine Perkins eligibility for each student. Students must meet the definition of a CTE Participant in order to be eligible for services provided by Perkins.
 - A CTE Participant is defined as a student taking at least one CTE course.
 - All universal courses, including all WBL course codes, are excluded from the definition of a CTE participant.

All uses of Perkins funds for WBL activities will be monitored for the 2024-2025 fiscal year. School systems not identified for Perkins monitoring through the risk assessment will only receive a modified version of the desk monitoring tool that includes only WBL.

The United States Department of Education has published a Notice of Interpretation regarding the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA), reminding grantees and subgrantees of their obligations to verify the eligibility of participants for federal benefits in CTE programs under the Carl D. Perkins Career and Technical Act (Perkins V) and adult education programs under Title II of the Adult Education and Family Literacy Act (AEFLA) and Work Force Innovation and Opportunity Act (WIOA). Subgrantees should take all appropriate actions to align such programs with the purposes of PRWORA by enhancing eligibility verification systems to the maximum extent possible to ensure taxpayer-funded benefits exclude any ineligible alien who entered the United States illegally or is otherwise unlawfully present in the United States.