

DEPARTMENT OF EDUCATION
P. O. BOX 2120
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CAREER AND TECHNICAL EDUCATION MEMO NO. 081-15

DATE: January 9, 2015

TO: CTE Administrators

FROM: Lolita B. Hall, Director
Office of Career and Technical Education Services

SUBJECT: Use of Perkins Federal Funds for Career and Technical Student Organizations

On December 19, 2014, a Superintendent's E-mail was issued to school division superintendents that included the following information:

Effective immediately, all previous guidance pertaining to use of federal Perkins funds for reimbursement of travel pertaining to Career and Technical Student Organizations (CTSO) expenditures is rescinded.

During a recent visit by a U. S. Department of Education Monitoring Team, the following question was asked about the use of Perkins federal funds for CTSO expenditures:

Question: May Perkins IV funds be used to support student transportation to, and lodging and meals at, technical skill competitions as part of state and national career and technical student organization (CTSO) conventions?

Answer: No, except in certain limited circumstances as described in the last paragraph of this answer. The Department's long-standing interpretation regarding the types of CTSO cost that may be paid from Federal grant funds is that Perkins funds used for support of CTSOs may not be used for lodging, feeding, conveying, or furnishing transportation to conventions or other forms of social assemblage.

Perkins funds may be used for these types of direct assistance if the costs are (1) related to a CTSO that is an integral part of the curriculum, and (2) part of a larger program to serve special populations or non-traditional students.

Based on the above guidance, school divisions must ensure that any request for CTSO reimbursement through Perkins funds shall comply with this guidance for implementation of the Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV).

The career and technical student organizations include:

FBLA	Future Business Leaders of America
FEA	Future Educators Association
FFA	Future Farmers of America
FCCLA	Family, Career, and Community Leaders of America
DECA	Distributive Education Clubs of America
HOSA	Health Occupations Students of America – Future Health Professionals
SkillsUSA	Skills United States of America
TSA	Technology Student Association

The Perkins definition of the term ‘special populations’ means:

- A. Individuals with disabilities;
- B. Individuals from economically disadvantaged families, including foster children;
- C. Individuals preparing for non-traditional fields;
- D. Single parents, including single pregnant women;
- E. Displaced homemakers; and
- F. Individuals with limited English proficiency.

The Perkins definition of the term ‘non-traditional fields’ means:

occupations or fields of work, including careers in computer science, technology, and other current and emerging high skill occupations, for which individuals from one gender comprise less than 25 percent of the individuals employed in each such occupation or field of work.

Details pertaining to the CTE courses that comply with the definition of non-traditional fields can be found in the [CTERS User’s Manual](#). The [CTE course list](#) is updated annually.

This guidance directs future use of Perkins funds for CTSO to strictly support participation of students who are determined to be eligible members of [special populations](#) and participants of [non-traditional fields](#). It is important to note that the guidance issued on December 19, 2014, via Superintendent’s E-mail, does not eliminate the ability to use Perkins funds for CTSO registration, transportation, lodging, and meals to CTSO regional, state and national conferences.

It should be further noted, according to the statewide 2013-2014 CTE Secondary Student Career Cluster Enrollment Report (SSCCER), 52 percent of the 284,977 students who were enrolled in CTE programs met the definition of special populations; and 16 percent of the 284,977 students were enrolled in a non-traditional field.

When submitting a Perkins financial reimbursement request through OMEGA for CTSO registration, transportation, lodging, and meals to CTSO regional, state and national conferences, each request must explain the expenditure in the description field, provide the total number of students who participated, and satisfy the definition of special populations and/or non-traditional fields. For example:

“Ten students and one teacher from J. T. Barber High School attended the Northern Regional TSA Spring Leadership Conference on March 7, 2015. Seven students were from special populations, three students were from a non-traditional field.”

Further, the [CTE equipment list](#) for “across-the-board” has been updated to reflect CTSO instructional resources approved for use of Perkins funds.

In accordance with the [Perkins Act of 2006, Title III, General Provisions, Part A](#), the use of Perkins funds shall supplement, and not supplant, non-Federal funds expended to carry out career and technical education activities.

State Career and Technical Education Regulations

“All career and technical education students shall be provided opportunities to participate in instructional activities. Each middle school career and technical education program (grades 6, 7, 8) offered shall include co-curricular instructional activities related to the respective career and technical education student organization. A career and technical education student organization shall be an integral and active part of each secondary career and technical program (grades 9, 10, 11, 12) offered. When dues are collected for membership in such organizations, payment of such dues shall not determine a student’s participation in instructional activities of the local organization” ([8VAC20-120-160](#)). Note: Perkins funds may only be used for grades 7 through 12.

Students who are enrolled in a CTE course within a program area shall have the opportunity to participate in the CTSO that supports the program area. Participation in a secondary CTSO would be permitted only if the student is an active participant in the primary CTSO that supports the program area.

Professional Development

The Office of Career and Technical Education will conduct a special 2014-2015 Perkins Local Plan Update video streaming administrator session on Thursday, February 5, 2015, 1:30-3:00 p.m. This professional development session will focus on “*Perkins Use of Funds for Career and Technical Student Organizations (CTSO)*.”

If you have questions, contact George R. Willcox, coordinator for planning, administration, and accountability, Office of Career and Technical Education, at cte@doe.virginia.gov or 804 225-2052.

LBH/GRW/ab

Copy: CTSO State Advisors