

# FDOE Perkins V Frequently Asked Questions



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## CLNA Process

<b>Pacing</b>	
<b>Question</b>	<b>Answer</b>
<b>Is it acceptable to complete half of the CLNA the first year of the needs assessment and then complete the last half in year 2? What are acceptable ways we can divide the CLNA over two years? Topic? Stakeholder category? Programs?</b>	For the 2020-21 CLNA, all portions and stakeholder engagement must be completed prior to the submission of the 2020-21 Perkins RFA. For future CLNAs, discretion is given to the eligible recipient on how to pace topics, stakeholder engagement, and program review during the 2-year CLNA process.

<b>Documentation</b>	
<b>Question</b>	<b>Answer</b>
<b>What documentation will my agency need to maintain regarding the results of the comprehensive local needs assessment?</b>	Maintain all documentation that led to the identification of needs, including documentation on stakeholder engagement, data analysis, labor market alignment, program and staff information, etc.

<b>Yearly Updates to CLNA</b>	
<b>Question</b>	<b>Answer</b>
<b>CLNA results must be submitted every two years, with yearly updates. Will the yearly updates be reported in the RFA?</b>	Yes.

<b>CTE Programs Not Funded by Perkins</b>	
<b>Question</b>	<b>Answer</b>
<b>Our agency offers CTE programs not funded with Perkins dollars. Do they have to be included in the</b>	Yes, all CTE programs offered by the agency must be included in the CLNA, even if a program does not receive Perkins funding. Additionally, agencies should examine local labor market need to determine if additional program offerings should be pursued.

Comprehensive Local Needs Assessment (CLNA)?	
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## CLNA Regional Collaboration

### Collaboration Requirements

Question	Answer
Is it required to collaborate with other regional education agencies on the CLNA?	The list of required stakeholders is in Sec. 134 (d) and (e). All of these stakeholders must be consulted, but CLNA collaboration is voluntary and discretion is given to eligible recipients on how to manage this requirement.

### Individual vs. Regional CLNA Requirements

Question	Answer
Can multiple Perkins eligible recipients turn in the same CLNA?	One CLNA must be completed per eligible recipient. Each agency will have different needs, students, program, staff, etc. and the CLNA should reflect this. That said, the FDOE strongly encourages collaboration on all aspects of the CLNA process. Stakeholder engagement, labor market alignment, programs of study, data analysis, plan and budget development are just a few examples of topics that would greatly benefit from the collaborative, collective intelligence of multiple agencies working together.

## CLNA Labor Market Alignment

### SOC Alignment

Question	Answer
Where do I find the "primary" SOC/occupation for a CTE Curriculum Framework/program?	A crosswalk of programs and SOCs is now available at: <a href="http://www.fldoe.org/academics/career-adult-edu/Perkins/clna.stml">http://www.fldoe.org/academics/career-adult-edu/Perkins/clna.stml</a> .
For alignment purposes, can I count a similar or related SOC/occupation or does it have to be an exact match?	It must be an exact match by SOC code and occupation name.

### Recentness of Labor Market Documentation

Question	Answer
How recent must the data sources and Letters of Support be?	Comprehensive Local Needs Assessments will be conducted every two years. All documentation that is within two fiscal years prior to the fiscal year the grant starts is permissible. For instance, if the grant starts in 2020-21, then documentation from 2019-20 and 2019-18 fiscal years is permissible. This allows agencies to strategize and spread the needs assessment process and its components across a two-year period.

### Sector Alignment

Question	Answer
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<p><b>How do I align Florida Enterprise or CareerSource Targeted Sectors to CTE programs?</b></p>	<p>Primary Sources to document sector alignment:</p> <p><i>CareerSource Targeted Sectors:</i> The agency has documentation that the program can be linked to an identified occupation or sector in the local CareerSource Board’s current WIOA plan.</p> <p><i>Enterprise Florida Targeted Industry Sector:</i> The agency has documentation that their program aligns with one of the current Enterprise Florida Targeted Industries:</p> <ul style="list-style-type: none"> <li>• Aviation &amp; Aerospace</li> <li>• Life Sciences</li> <li>• Manufacturing</li> <li>• Defense &amp; Homeland Security</li> <li>• Information Technology</li> <li>• Financial &amp; Professional Services</li> <li>• Logistics &amp; Distribution</li> <li>• Cleantech</li> </ul> <p>The agency may document the justification for the alignment of the program to the industry sector.</p> <p>Agencies may also provide documentation using two Secondary Sources. Visit <a href="http://www.fldoe.org/academics/career-adult-edu/Perkins/clna.stml">http://www.fldoe.org/academics/career-adult-edu/Perkins/clna.stml</a> for full requirements and resources.</p> <p>A crosswalk of secondary technology education programs to Enterprise Florida Targeted Industries is also available at: <a href="http://www.fldoe.org/academics/career-adult-edu/Perkins/clna.stml">http://www.fldoe.org/academics/career-adult-edu/Perkins/clna.stml</a>.</p>
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<b>Letters of Support for Labor Market Alignment</b>	
<b>Question</b>	<b>Answer</b>
<p><b>Can I have a Letter of Support signer sign off on labor market alignment for multiple programs at once?</b></p>	<p>A single letter from a secondary source may include documentation for multiple programs. However, do not submit a generic letter of support in which the submitter lists all of the programs without information on how this program has local labor market demand.</p>

## **Size, Scope, and Quality (SSQ)**

<b>Funding for Programs Not Yet Meeting SSQ/New Programs</b>	
<b>Question</b>	<b>Answer</b>
<p><b>Can programs not meeting all SSQ criteria be funded?</b></p> <p><b>Can I use Perkins funds for startup costs for a new program at my institution?</b></p> <p><b>Must a program have already met Size, Scope, and Quality criteria in a previous</b></p>	<p>Programs not meeting SSQ cannot have funds used on them, with important exceptions for programs being developed, newly implemented, or brought in to SSQ compliance (Sec. 135). Perkins funds can only be used on in-development programs if they:</p> <ul style="list-style-type: none"> <li>• Have enrollment during the fiscal year in which the funds are spent.</li> </ul>

<p>school year to spend Perkins funds on it? Or, if a program will meet SSQ in the future, can I use Perkins funds on it?</p>	<ul style="list-style-type: none"> <li>• Are fully established before the end of the duration of the locally-offered, SSQ-compliant course sequence. For instance, a District starting a new three year program has under three years to start offering work-based learning, a credential, the full course sequence, etc.</li> <li>• Use funds to cover expenses outlined in the Perkins law, section 135, Local Use of Funds.</li> <li>• Beginning with the 2020-2021 fiscal year, meet needs outlined in the Labor Market section of the Comprehensive Local Needs Assessment (CLNA).</li> </ul> <p>Caution should be given to avoid supplanting violations. Meaning, Perkins funds cannot be used to cover expenses that have recently been covered by other State or local funds.</p>
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**Work-Based Learning Definition**

Question	Answer
<p>How does Florida define work-based learning to meet the Scope criteria?</p>	<p><a href="#">Perkins V Sec. 3(55)</a> definition: “WORK-BASED LEARNING.—The term ‘work-based learning’ means sustained interactions with industry or community professionals in real workplace settings, to the extent practicable, or simulated environments at an educational institution that foster in-depth, firsthand engagement with the tasks required of a given career field, that are aligned to curriculum and instruction.”</p> <p>FDOE guidance and webinar are available on the FDOE CLNA page: <a href="http://www.fldoe.org/academics/career-adult-edu/Perkins/clna.stml">http://www.fldoe.org/academics/career-adult-edu/Perkins/clna.stml</a>. This guidance includes an “Experiential Learning Framework” that includes a number of examples of activities that meet the Size, Scope, and Quality definition of work-based learning.</p>

**Documenting Work-Based Learning at School vs. District Levels**

Question	Answer
<p>On the CLNA template for Size, Scope, and Quality for grades 9-12, do we need to list the work based learning opportunities available to students by school?</p>	<p>No. Simply provide a list of all types of work-based learning (WBL) opportunities available for the program in the district. It is important to remember, however, that the requirement is that each program receiving Perkins funds must offer “an opportunity for work-based learning, career and technical student organizations, or capstone experiences.” The requirement is at the high school level, not the District. This requirement could be reviewed during any monitoring visits. The reporting in the template, however, is to inventory the opportunities across the District specific to that program at all high schools. So, list all relevant WBL opportunities— there is no need to include school numbers in the WBL-related columns.</p>

**Capstone Experiences Must Meet Work-Based Learning Requirements**

Question	Answer
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Must capstone experiences meet the work-based learning requirements?	Yes.
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### “Sustained Interactions” for Work-Based Learning Definition

Question	Answer
<p>What does a “sustained interaction” mean for work-based learning?</p> <p>Can the “sustained interactions” required in the Perkins V definition of work-based learning permit interactions that are separate but related to the work-based learning?</p>	<p>The Perkins V definition of work-based learning states that work-based learning must include “sustained interactions with industry or community professionals.” For Florida, “interactions” means:</p> <ul style="list-style-type: none"> <li>• Online or in-person</li> <li>• Integrated into the work-based learning experience or separate from it</li> </ul> <p>Further flexibility is given in the Law when it is permitted to have interactions with “community professionals.” This is a broad term that includes more than just those employed in a given career field and includes those with expertise that is “aligned to curriculum and instruction” of the CTE program.</p>

### “Industry and Community Professionals” Not Inclusive of Instructors

Question	Answer
<p>Can CTE teachers with industry experience count as the “industry professionals” required for “sustained interactions” in the Perkins V work-based learning definition?</p>	<p>No. The purpose of the “industry and community professionals” clause within the Perkins V work-based learning definition is to expand the horizons of students through first-hand engagement with professionals of a career field. This allows students to clarify interest in a career, witness employability skills, be able to ask questions, network to increase the likelihood of gaining employment, etc. See Sec. 3 (55) of Perkins V for context of excerpts.</p>

### All Programs Not Required to Have Program of Study

Question	Answer
<p>Does a program need to be part of a fully implemented Perkins-defined Program of Study in order to be Perkins fundable?</p>	<p>No. In order to receive Perkins funding, a program does not need to be part of a Program of Study. The federal law requires that at least one program offered by each eligible recipient (secondary school district, technical college, or state college) be part of a program of study. In addition, in order to encourage the development of additional programs of study, the FDOE has established a requirement that 25% of a secondary eligible recipient’s students be enrolled in a program of study by 2021-22, 50% by 2022-23, and 75% by 2023-2024. However, funding for individual programs is not contingent on them being part of a program of study provided they meet the other requirements for Size, Scope, and Quality and meet needs identified in the Comprehensive Local Needs Assessment.</p>

### Middle School CTE Encouraged, But Not Required

Question	Answer

Does an eligible recipient have to offer a middle school course or program?	No. But it would be beneficial to your students to be exposed to CTE or have the opportunity to begin a CTE program during middle school.
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**Middle/High School CTE Alignment Is District-Wide, Not Via Feeder Schools**

Question	Answer
Can we use Perkins funds for middle school programs as long as there is a high school, whether or not it's in the direct feeder pattern, in our District that has a pathway? For example, middle school A has Ag, high school A that it feeds does not but high school B in the district does have Ag.	The alignment between middle and high school CTE is district-wide and need not necessarily be at the feeder school level.

**Dual Enrollment, AP, IB, & AICE for Course Substitution to Meet Course Number Requirement**

Question	Answer
Can a secondary program meet the Size, Scope, and Quality three course requirement (or two courses for two course programs) by substituting CTE courses with dual enrollment or aligned accelerated courses like AP, IB, or AICE?	<p><b>Dual Enrollment:</b> Postsecondary courses can be substituted for secondary CTE courses to meet the Size, Scope, and Quality course number requirement if the postsecondary courses are from a CTE program that is aligned with the secondary program in a fully-compliant Perkins V Program of Study. There is no limit to the number of permissible course substitutions.</p> <p><b>Accelerated Academic Courses:</b> AP, IB, AICE and other forms of accelerated academics may only be substituted for CTE courses to meet the Size, Scope, and Quality course number requirement if the relevant secondary CTE Curriculum Framework sanctions these substitutions.</p>

**Dual Enrollment – Recorded As Secondary or Postsecondary?**

Question	Answer
Does dual enrollment get recorded on the secondary or postsecondary SSQ Template?	Dual enrollment programs are postsecondary programs therefore they are recorded on the Postsecondary template by the agency that provides such dual enrollment instruction.

**Agency/District/College #**

Question	Answer
How do I find my Agency/District/College number?	Your agency number is available from your grant manager or previous RFAs. Your district number and college reporting numbers are those used for your data submissions to the Department.

**Listing School/Site/Campus Under Scope & Quality**

Question	Answer
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<b>Do I have to list the high schools/instructional sites/campuses for the Scope and Quality criteria?</b>	No. Size requires listing schools/sites/campuses, but Scope and Quality are to inventory the offerings across at the eligible recipient level across all locations.
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### **Listing Intended Programs Not Yet Implemented**

<b>Question</b>	<b>Answer</b>
<b>Should programs not yet offered but rather intended for development be listed on the SSQ Excel sheet?</b>	No. Only list current offerings.

### **Stand-Alone CCCs Must Meet SSQ**

<b>Question</b>	<b>Answer</b>
<b>Do CCCs have to meet all of the SSQ criteria?</b>	If the eligible recipient offers the CCC as a standalone to students (in other words, students can enroll in the individual CCC rather than the AS degree program), the CCC program must meet all the SSQ requirements in order to spend Perkins funds on the program.

## **Stakeholder Engagement**

### **Unsuccessful Attempts at Consultation**

<b>Question</b>	<b>Answer</b>
<b>Does attempting to contact a stakeholder category without success meet the CLNA requirements? What if they do not return my calls and emails?</b>	If you can provide documentation of authentic contact attempts, this is sufficient. The heart of the CLNA engagement requirement is to ensure that Perkins eligible recipients are doing due diligence to be fully informed regarding how to improve future CTE offerings. It is in the best interest of our students to make concerted efforts to ensure stakeholder engagement contact is made and is effectual.

### **Recentness of Contact**

<b>Question</b>	<b>Answer</b>
<b>How recent must the stakeholder engagement be?</b>	Comprehensive Local Needs Assessments will be conducted every two years. All documentation that is within two fiscal years prior to the fiscal year the grant starts is permissible. For instance, if the grant starts in 2020-21, then documentation from 2019-20 and 2019-18 fiscal years is permissible. This allows agencies to strategize and spread the needs assessment process and its components across a two year period.

### **Documentation**

<b>Question</b>	<b>Answer</b>
<b>What documentation will my agency need to document contact with stakeholders?</b>	See the "Stakeholder Consultation Template" at <a href="http://www.fldoe.org/academics/career-adult-edu/Perkins/clna.stml">http://www.fldoe.org/academics/career-adult-edu/Perkins/clna.stml</a> for requirements.



## Student Indicator Performance

Using Perkins IV Data	
Question	Answer
Can we use Perkins IV indicator performance to complete the Student Performance section of the CLNA?	Yes. See <a href="#">Narrative Information and Template Overview</a> for more information.

Middle School CTE Encouraged, But Not Required	
Question	Answer
When determining concentrator status, must the student have completed the first courses, or can it be any courses within the program?	It may be any courses within the program.

Determining If a Program is Non-Traditional	
Question	Answer
How are nontraditional programs identified to be included in the nontraditional-related performance measures?	Non-traditional programs are programs which lead to careers that historically have a low representation of one gender (25% gender participation or less). For example, automotive programs are considered “non-traditional” for women because there is historically an under-representation of women in the field. Florida utilized non-traditional program designations as determined by the National Alliance for Partnerships in Equity (NAPE).

## Funding

How Local Allocations Are Calculated	
Question	Answer
How will my agency’s funding allocation be determined?	<p>Funds allocated to local agencies are first divided by secondary and postsecondary, based on a three-year average of FTE. Then, secondary allocations are distributed based on a formula outlined in the Perkins V law, section 131, with 30% of the allocation based on the number of people aged 5 to 17 who reside in the district, and 70% of the allocation based on the number of people aged 5 to 17 who reside in the district and who are from families with incomes below the poverty line.</p> <p>Postsecondary allocations are based on the number of economically disadvantaged students enrolled in CTE programs. The allocations are based on the same formulas used in Perkins IV, with the exceptions that for postsecondary students, the homeless student indicator has been added as an indicator of economically disadvantaged, and only those students taking course work associated with a postsecondary CTE program will be included in the formula.</p>

## Funding Apprenticeships and Pre-apprenticeships with Perkins

Question	Answer
<b>Can Perkins funds be used to support Registered Apprenticeships and pre-apprenticeships? Are there limitations?</b>	<p>Perkins funds can be only used to support registered apprenticeships and preapprenticeships under the following conditions:</p> <ul style="list-style-type: none"><li>• The apprenticeship must be registered with the State</li><li>• The funds may only be used on classroom related instruction</li><li>• The related instruction must meet the state standards for size, scope, and quality, and labor market alignment</li><li>• Funds may only be used to support apprenticeship students who are employed in counties inside the geographic service area of the Perkins eligible recipient</li></ul>

## Funding Digital Tools with Perkins

Question	Answer
<b>Can Perkins funds be used to support student attainment of Digital Tools certificates?</b>	<p>No. Perkins funds cannot be used for Digital Tolls certificates, curriculum or exams. Digital Tool Certificates are not Perkins-approved credentials and are therefore ineligible for Perkins funds.</p>

