

Use of Perkins Funds for ACP Implementation
September 2015

The intention of this document is to help clarify how Carl Perkins funds can help **supplement** the State Academic and Career Planning (ACP) implementation requirement.

Supplement not Supplant: Carl Perkins is subject to supplement not supplant, so when ACP became a state initiative, it is no longer just supplementing the program. Note that 2 C.F.R. Part 200, Compliance Supplement states that **supplanting occurs if the LEA uses Federal funds to provide services that are required to be made available under other Federal, State or local laws.**

At the link

https://www.whitehouse.gov/sites/default/files/omb/assets/OMB/circulars/a133_compliance/2015/ed.pdf, see page 4-84.048-9 and 4-84.000-19 through 4-84.000-20.

ACP Statute : On June 30, 2013, through [Act 20](#), Wisconsin Statute [115.28\(59\)](#) \$1.1 million dollars of General Purpose Revenue (GPR) for 2014-15 was allocated for a new continuing appropriation by the legislature for implementing academic and career planning statewide. The requirements of the legislation include:

- Require DPI to ensure that, beginning in 2017-18, every school board is providing academic and career planning services to pupils enrolled in grades 6 to 12 in the school district.
- Require DPI to procure, install, and maintain information technology, including computer software, to be used statewide by school districts to provide academic and career planning services to pupils in grades 6 to 12.
- Require DPI to provide guidance, training, and technical assistance to school districts and school district staff, including teachers and counselors, on how to implement model academic and career plans, including training and technical assistance that is necessary to implement the information technology provided for this purpose.
- Require DPI promulgate rules to implement these provisions. [Act 20 Sections: 230 and 1737]”

Our guidance for determining supplement not supplant related to ACP is a two part process. **It is important to note that you must meet Part I to be able to move to Part II.**

Part I: To be allowable at all for Perkins funding, the expenditure must meet the requirements as outlined in the [Guidance for Carl Perkins Expenditures](#) document. If the expenditure does not meet the requirements outlined on that document, Perkins funding cannot be used.

Part II: Is intended to address specific situations you may encounter. You must meet Part I before moving on to Part II. ACP situations that are not addressed in this guidance should be directed to Roselynn Bittorf at (608) 266-3922 or roselynn.bittorf@dpi.wi.gov.

Part II: Situations/Examples

Expenditure:	Allowable:	Unallowable:
ACP professional development, meetings/conferences, training	Professional development that includes: <ul style="list-style-type: none"> • non-traditional occupations • Program of Study (POS) development – CTE curriculum and course integration of academic, technical & employability skills • partnership development • work-based learning • core indicator correction • counseling for career decision making 	<ul style="list-style-type: none"> • Note: ACP pilot districts will be reimbursed from DPI for attending required ACP DPI sponsored training
Position funding	<ul style="list-style-type: none"> • Meets the requirements for position funding as outlined in the Guidance for Carl Perkins Expenditures 	<ul style="list-style-type: none"> • Paying for staff time to develop, plan, prepare and deliver ACP services other than through those allowable under a specific POS.
Career exploration software	<ul style="list-style-type: none"> • Allowable through the 2016-17 school year. 	<ul style="list-style-type: none"> • Beginning in 2017-18 ACP funds will provide a statewide system at no cost to school districts. • At that time school districts must decide if they want to join the statewide system or continue to use their own. • Because the state is providing a statewide system, DPI will no longer allow Perkins funds to pay for this, so school districts must plan to use local funds.
Activities related to counseling services & ACP	<ul style="list-style-type: none"> • Counseling activities related to comparing POSs based on student interest • Counseling activities related to comparing post-secondary options in the chosen POS 	<ul style="list-style-type: none"> • Counseling activities without a clear connection to CTE or POS

Expenditure:	Allowable:	Unallowable
Activities related to connecting Career opportunities & ACP	<ul style="list-style-type: none"> • Labor Market Information (LMI) review & evaluation for POS relevance • Stakeholder outreach, communications, meetings, & needs assessments to develop, implement, or refine new or current POS • Coordinated connections for school-to-work, career/tech prep networks, and work-based learning opportunities • Student activities as related to career exploration and POS participation in CTE classes 	<ul style="list-style-type: none"> • Career preparation activities for career research, mentoring, and planning and management activities such as resume writing, applying for jobs, applying to colleges, applying for financial aid, visiting colleges, etc. • Serving non-CTE students
Activities related to connecting Programs of Study & ACP	<ul style="list-style-type: none"> • Team collaboration, coordination and curriculum development for a specific POS for development, implementation, or refinement • Integrating academic, technical and career readiness skills for a specific POS for development, implementation, or refinement • Designing, building, or evaluating a specific POS for development, implementation, or refinement • Mapping out required courses & experiences for each POS 	<ul style="list-style-type: none"> • Development of new courses for ACP service delivery • Citizenship or civics related training and curriculum • Financial literacy related training and curriculum • Financial Aid training and curriculum • Parental engagement activities