HIGH SCHOOL
CAREER AND TECHNICAL EDUCATION
TEACHER PATHWAY INITIATIVE

FREQUENTLY ASKED QUESTIONS
FOR THE FISCAL YEAR 2017
COMPETITION AND GRANT AWARDS

CFDA Number: 84.051D
Application Closing Date: July 28, 2017
Purpose of these Frequently Asked Questions

The purpose of these Frequently Asked Questions is to provide information about the High School Career and Technical Education Teacher Pathway Initiative (High School CTE TPI). They address questions from prospective applicants about the fiscal year (FY) 2017 High School CTE TPI competition announced in the Notice Inviting Applications (NIA) published in the Federal Register on June 13, 2017 (82 FR 27047).

These Frequently Asked Questions do not impose any requirements beyond those included in NIA and in applicable regulations.

The Department will provide additional or updated information about this competition, as necessary, on the Perkins Collaborative Resource Network (PCRN website) at http://cte.ed.gov/.

If you have further questions that are not answered here or are interested in commenting on these Frequently Asked Questions, please email CTEteachergrant@ed.gov.
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A. Eligibility

A-1. What entities are eligible to apply for a High School CTE TPI grant?

The following entities are eligible to apply under this competition:

a. A State board designated or created consistent with State law as the sole State agency responsible for the administration of CTE in the State or for the supervision of the administration of CTE in the State;

b. An LEA (including a public charter school that operates as an LEA), an area CTE school, an educational service agency, or a consortium of such entities, in each case, that receives assistance under section 131 of the Perkins Act;

c. An Eligible Institution that receives assistance under section 132 of the Perkins Act.

Note: “Eligible Institution” is defined in the NIA and in Section 3(13) of Perkins IV.

A-2: What is career and technical education?

Perkins IV, defines CTE as organized educational activities that—
(A) offer a sequence of courses that—
   (i) provides individuals with coherent and rigorous content aligned with challenging academic standards and relevant technical knowledge and skills needed to prepare for further education and careers in current or emerging professions;
   (ii) provides technical skill proficiency, an industry-recognized credential, a certificate, or an associate degree; and
   (iii) may include prerequisite courses (other than a remedial course) that meet the requirements of this subparagraph; and

(B) include competency-based applied learning that contributes to the academic knowledge, higher-order reasoning and problem-solving skills, work attitudes, general employability skills, technical skills, and occupation-specific skills, and knowledge of all aspects of all aspects of an industry, including entrepreneurship, of an individual.

A-3. What is a local educational agency (LEA)?

The ESEA generally defines an LEA as a public board of education or other public authority legally constituted within a State for either administrative control or direction of, or to perform a service function for, public elementary schools or secondary schools in a city, county, township, school district, or other political subdivision of a State, or for a combination of school districts or counties that is recognized in a State as an administrative agency for its public elementary schools or secondary schools. Perkins section 3(19) incorporates this definition. For the full definition of an LEA, please see section 8101(30) of the ESEA, as amended by the Every Student Succeeds Act (ESSA).

A-4. What is an educational service agency?

Section 3(11) of Perkins IV defines an educational service agency, by referencing the ESEA, which defines an educational service agency as a regional public multiservice agency authorized
by State statute to develop, manage, and provide services or programs to local educational agencies. See section 8101(18) of the ESEA, as amended by the ESSA.

A-5.  **Is a 2-year college an eligible applicant?**

Yes. A 2-year college is an eligible applicant if it is a public or nonprofit private institution of higher education that offers CTE courses that lead to technical skill proficiency, an industry-recognized credential, a certificate, or a degree. See Section 3(13)(A) of Perkins IV.

A-6.  **Is a state university an eligible applicant?**

Yes, a state university is an eligible applicant if: (1) it is a public or nonprofit private institution of higher education that offers CTE courses that lead to technical skill proficiency, an industry-recognized credential, a certificate, or an associate degree; AND (2) if it receives assistance under Section 132 of Perkins IV.

A-7.  **Is a community-based organization an eligible applicant?**

No. A community-based organization is not an eligible applicant because it is not one of the entities listed in the Eligible Applicants section of the NIA.

A-8.  **Is the State agency that administers the State-formula Perkins program for the State board of career and technical education the eligible applicant or would the State board be the eligible applicant?**

The eligible applicant would be the entity named as the RECIPIENT in Block 1 of the grant award notification (GAN) for the Perkins Basic State Grant (CFDA 84.048A).

A-9.  **In a State where the postsecondary or workforce development state agency is named as the RECIPIENT in Block 1 of the GAN for the Perkins Basic State Grant (CFDA 84.048A) but the K-12 State agency administers Perkins funding to secondary local eligible recipients on behalf of the State board of career and technical education, is the K-12 State agency also an eligible applicant?**

No. The eligible applicant would be the entity named as the RECIPIENT in Block 1 of the GAN for the Perkins Basic State Grant (CFDA 84.048A). However, the K-12 agency could participate in the project in collaboration with the eligible applicant as described in Requirement 2 of the NIA.

A-10. **If an eligible applicant submits the application on behalf of the partnership, but chooses to play a supporting role only and decides to NOT be the lead organization in the project, could another partner in the project be the lead in project implementation?**

Yes. However, if the application is selected for funding, the eligible applicant still would be considered the actual grantee and, as such, would be held legally responsible for the grant and for ensuring that all grant terms and conditions are met and that funds are used properly. The onus would be on the applicant to explain and justify the partner’s lead role in the project.
A-11. May an entity participate in more than one application submission?

There is no prohibition against participating in more than one application. However, if after all applications are reviewed and scored and an entity would be participating in more than one project within the funding range, the Department will take action to ensure that it does not fund projects in which any entity would be implementing duplicative or overlapping activities.

A-12. Will there be only one grant award per State? For example, could two LEAs from within one State apply and receive a grant award if both scored in the funding range?

The Secretary intends to make grant awards to eligible applicants based on the recommendations of independent peer reviewers, who will use the selection criteria outlined in Section V.1. of the NIA to score the applications; applications from all applicants deemed eligible will be reviewed and scored individually. Therefore, there could be more than one grant awarded within a State (i.e. two LEAs within one State could receive a grant award).

A-13. May an LEA within a State whose State agency or board is applying for a High School CTE TPI grant apply independently of the State?

Yes. The Secretary intends to make grant awards to eligible applicants based on the recommendations of independent peer reviewers, who will use the selection criteria outlined in Section V.1. of the NIA to score the applications; applications from all applicants deemed eligible will be reviewed and scored individually.

A-14. May multiple eligible applicants, such as a group of States or a State and an LEA, submit a single group application?

Yes. Under 34 C.F.R. 75.127, any eligible party may apply with other eligible parties as a group for a grant. Generally, this could happen in two ways: as a joint applicant or as a consortium. Eligible applicants considering applying for funds as a group should review 34 CFR 75.127 through 75.129 carefully to determine the approach that best suits their needs.

Please note that in order to meet Requirement 2, applicants may, but are not required to, submit as joint applicants. Please remember that in order to meet Requirement 2, an applicant must identify the partner organizations included in its application and include a letter of commitment from each entity with which it will partner to implement the proposed project.

B. Priorities

B1. Absolute Priority — Cash or In-Kind Matching

B1-1. How does the Absolute Priority relate to funding eligibility?

In order to be eligible and to be considered for funding under the High School CTE TPI program, an applicant must meet the Absolute Priority. Points are not awarded for meeting an Absolute Priority; rather, applications that do not meet an Absolute Priority will not be considered for funding.
B1-2. Must High School CTE TPI grantees secure matching funds to support their project activities?

Yes. An applicant must provide, from other Federal or non-Federal sources, a cash or in-kind match that is equal to or greater than 20 percent of the requested grant award amount, calculated consistent with 2 CFR part 200.306. Each applicant, in its application, must provide a signed assurance attesting to its intent and ability to meet this requirement, and must include its matching contribution in its budget for the proposed project.

B1-3. From what funds may applicants provide the required 20 percent match?

Applicants may provide the matching funds from any other Federal or non-Federal source. This could include, but is not limited to, funding available to applicants under Perkins IV, Title I of the Workforce Innovation and Opportunity Act (WIOA), state education or workforce development funds, and contributions from business or philanthropy. Please remember that the use must be consistent with all applicable Federal, State, and local laws and regulations.

B1-4. May an applicant use its Perkins grant or subgrant in order to meet the match requirement?

Yes, an applicant may use its Perkins State formula grant or local formula subgrant to meet the Absolute Priority – “Cash or In-Kind Matching”, provided that this use complies with all Perkins statutory requirements, including supplement-not-supplant requirements (Section 311 of Perkins IV). For example, if a State eligible applicant elects to use a portion of its Perkins State leadership funds (see section 124(b)(3) and 124(c)(16)) to meet the Absolute Priority, the applicant must be sure that in the prior year, it did not use State funds for this purpose or activity. As another example, if a local eligible applicant elects to use a portion of its Perkins subgrant funds to meet the Absolute Priority, the local eligible applicant must ensure that it complies with the requirements in Section 135 of Perkins IV (Local Uses of Funds), in addition to the supplement not supplant requirements provisions in Section 311 of Perkins IV. If an applicant must alter its approved Perkins plan activities in order to provide the match, the applicant must amend its Perkins plan and obtain appropriate approval within 90 days of the grant award. For more details, please see Sections 124, 135, and 311 of Perkins IV; see also FAQ D.22 of the Compiled Perkins FAQs for more information on supplement-not-supplant.

B1-5. May an applicant use other Federal funds in order to meet the match requirement?

Yes, however the use of the other Federal funds to meet the Absolute Priority match requirement must be consistent with all applicable statutory and regulatory requirements. Additionally, applicants should refer to the Uniform Guidance on cost-sharing and matching in 2 CFR § 200.306 for provisions pertaining to in-kind (and cash) contributions.

B1-6. When must a grantee secure the required match?

The Absolute Priority in the NIA provides that, in its application, each applicant must provide a signed assurance attesting to its intent and ability to meet the High School CTE TPI match requirement. Each applicant must also include its matching contribution in its budget for the proposed project.
If awarded a grant, the eligible entity would need to secure the promised match in time to use these resources during the project year in which it had proposed their use in its approved High School CTE TPI application.

B1-7. Is the required match 20 percent of the total amount of the High School CTE TPI grant award?

Yes. Therefore, for example, if an applicant receives a High School CTE TPI grant of $500,000 for the project, it would need to obtain a commitment for a match of $100,000, which is 20 percent of the amount of the Federal grant award.

B1-8. May an applicant receive a High School CTE TPI grant if it is unable to provide both a signed assurance attesting to its intent and ability to meet this requirement, and a matching contribution in its budget for the proposed project as a cash or in-kind match that is equal to or greater than 20 percent of the amount of the requested grant award amount?

No. The Absolute Priority requires that each application provide a cash or in-kind match that is equal to or greater than 20 percent of the amount of the requested grant award amount, calculated consistent with 2 CFR part 200.306. Each applicant, in its application, must provide a signed assurance attesting to its intent and ability to meet this requirement, and must include its matching contribution in its budget for the proposed project.

B1-9. May more than one partner or other entity, such as an institution of higher education (IHE) or a business, contribute toward the match?

Yes. Matching funds (cash or in-kind) may come from one or more partners.

B1-10. Must all partners or members of a consortium contribute towards the match?

No.

B1-11. May the value of volunteered services count towards the required match?

Yes. 2 CFR § 200.306(e) permits volunteered services to be treated as an in-kind contribution, and specifies how these contributions are to be valued:

Volunteer services furnished by third-party professional and technical personnel, consultants, and other skilled and unskilled labor may be counted as cost sharing or matching if the service is an integral and necessary part of an approved project or program. Rates for third-party volunteer services must be consistent with those paid for similar work by the non-Federal entity. In those instances in which the required skills are not found in the non-Federal entity, rates must be consistent with those paid for similar work in the labor market in which the non-Federal entity competes for the kind of services involved. In either case, paid fringe benefits that are reasonable, necessary, allocable, and otherwise allowable may be included in the valuation.

B1-12. What are some examples of acceptable in-kind contributions?

Some examples of costs, services, or in-kind contributions that may be claimed as match if paid with other, non-grant funds include:
1. Personnel costs associated with the management or administration of the High School CTE TPI project.

2. Personnel costs associated with the time that teachers participate in High School CTE TPI project activities.

3. Non-personnel costs relating to the implementation, management, or administration of the High School CTE TPI project.

B2. Invitational Priority: Rural Local Educational Agencies

B2-1. What is an invitational priority?

Invitational priorities signal areas the Department is particularly interested in; applicants who meet an invitational priority do not earn extra points and are not given preference over other applications.

B2-2. How do I find out if my LEA is eligible for the Small Rural School Achievement (SRSA) program or the Rural Low-Income School (RLIS) program?

Eligible applicants may determine whether a particular LEA is eligible for these programs by referring to information on the Department’s Web site at www2.ed.gov/nclb/freedom/local/reap/html.

C. Requirements

C1. Requirement 1—Use of Funds

C1-1. Which entity makes the determination that an industry sector or occupation is an In-Demand Industry Sector or Occupation, as defined in the NIA?

The State board or local board, as appropriate, makes the determination using State and regional business and labor market projections and other labor market information. The State board or local board is the board under sections 101 and 107, respectively, of WIOA.

See sections 101 and 107 of WIOA for the definitions of “State workforce development board” and “local workforce development board.”

C1-2. May an applicant propose to use High School CTE TPI funds for project activities that are not listed in Requirement 1 of the NIA?

Yes. The activities listed in Requirement 1 (A) through (I) are not exhaustive. The NIA states that a “grantee must carry out one or more activities designed to increase recruitment and retention of high school CTE teachers for CTE programs that align to an In-Demand Industry Sector or Occupation, in States or communities where shortages of such teachers exist . . .” Therefore, an applicant may propose to carry out one or more of the activities listed in the NIA, or other activities that fit its project design and are consistent with the NIA and Perkins IV.
C2. **Requirement 2 – Partnerships**

C2-1. **Must the eligible applicant include at least one of the partners listed under Requirement 2?**

No. An applicant must propose to carry out the project in collaboration with at least one or more partner organizations and must identify each organization(s) in its application and include a letter of commitment from each organization; however, the Department believes applicants are best suited to determine which organizations would best support the work of the proposed High School CTE TPI grant. Consequently, applicants may propose to partner with entities or organizations other than those listed under Requirement 2.

C2-2. **Must all partners be non-profit entities?**

No. Partner organizations are not required to be non-profit entities.

C2-3. **Could a potential partner be a partner for more than one eligible applicant?**

Yes. A potential partner could agree to partner with more than one eligible applicant.

D. **Selection Criteria**

D-1. **How will applications be reviewed?**

The Department intends to screen applications to determine the eligibility of the applicants. This review includes: whether the applications have been submitted by an eligible applicant, whether the applications meet the High School CTE TPI Absolute Priority and whether the applications meet the Application Requirements contained in the NIA.

In addition, the Department intends to use independent peer reviewers with relevant expertise to determine how well the applications address the program’s selection criteria included in the NIA. These reviewers will use their professional judgment to evaluate and score each application based on these selection criteria.

D-2. **Will an applicant receive its scores and reviewer comments after the competition is completed?**

Yes. Both funded and unfunded applicants will receive a copy of the technical review forms completed by the peer reviewers when reviewing the applications. The Department will delete the names of the peer reviewers from the technical review forms in order to preserve the reviewers’ confidentiality.

D-3. **Will the reviewers be asked to read every part of each application they review?**

Yes, although their review and scoring will focus on the quality of an application’s response to the High School CTE TPI’s selection criteria, not whether an application meets the Absolute Priority and Application Requirements. To facilitate the review process, the Department
encourages applicants to carefully follow the directions in the application package. Applicants should pay particular attention to the flow of the narrative, and correctly label all attachments.

E. Budgets

E-1. For how long may an applicant seek an award of High School CTE TPI funding?

Applicants may apply for a High School CTE TPI grant of up to three years. Except in unusual circumstances, awards are expected to be made for a single budget period of 36 months.

E-2. When does the Department expect to make High School CTE TPI grant awards?

We anticipate that grants will be awarded by September 30, 2017.

E-3. What is the anticipated start date of the project?

We anticipate that projects will begin in October 2017.

E-4. On the SF-424 Form (the Application for Federal Assistance form) that each applicant must include with its application, under “Estimated Funding,” should an applicant enter the budget request for the entire project period?

Yes. An applicant should enter the amount of its budget request for the entire 36 months of its project. Further instructions on completing the SF-424 and SF-524 are included in the application package instructions document on Grants.gov.

E-5. Is a planning period allowed during Year 1?

The NIA does not provide for a planning period for the High School CTE TPI. The Department expects project activity to begin soon after an applicant receives a grant award. However, we understand there may be certain activities that may require a phase-in period and that the budget and timeline for implementation may reflect such a phase-in for specific activities.

E-6. Since an applicant must submit a High School CTE TPI application that includes a proposed budget that identifies non-High School CTE TPI funds (or in-kind contributions) to be used to implement the proposed project, does the Department’s award of a grant establish a requirement that the grantee provide those funds (or in-kind contributions) identified in the approved budget for the project?

Yes. Under 34 CFR § 75.700, each grantee must comply with the content of its approved application, which would include its approved budget, budget narrative, and any descriptions of use of these funds elsewhere in the application. Therefore, if an application is approved, the grantee is responsible for providing the level of non-grant funds or in-kind resources set forth in Section B of the Department’s Form 524, and described in either the budget narrative or elsewhere in the application. (The same would be true if the applicant offered to provide Federal funds from non-High School CTE TPI program funds, but these would be separately described in Section B of the Department’s Form 524.) In addition, grantees are required to
report on the extent to which they have met these responsibilities in their annual performance reports.

If, after award, an anticipated source of matching funds or in-kind contributions does not materialize, the Department may consider a proposed substitution of other sources of funds or contributions that would provide services consistent with the scope and objectives of the approved High School CTE TPI project. Whenever a grantee finds that an anticipated source of matching funds or in-kind contributions is not available, it should notify the Department’s project officer so that the Department can advise the grantee about available options.

E-7. **What should be included in the budget narrative?**

As explained in the application package, an application should include a budget narrative that provides a detailed description of how the applicant plans to use, for each project year, both its requested High School CTE TPI grant funds and the Federal and non-Federal funds or in-kind resources it proposes to provide – either to meet the Absolute Priority or as other contributions to project services.

The budget narrative should be of sufficient scope to detail what the applicant would provide with both Federal and non-Federal funds and in-kind contributions, and thus enable: (1) the Department to determine if the costs are necessary, reasonable, and otherwise allowable, and (2) the peer reviewers to understand how the applicant proposes to use Federal and non-Federal funds and in-kind contributions to support the proposed project.


E-8. **How should the proposed budget identify the value of any materials and services that would be provided as part of the project’s contribution of non-Federal resources?**

The value of these services or materials should be indicated in Section B of the Department’s Form 524. The value of these services or materials should be calculated in a manner that is consistent with 2 CFR § 200.306. The same would be true for any Federal funds from non-High School CTE TPI program funds that would be provided.

E-9. **If a State or LEA currently funds activities that it proposes to continue under the proposed High School CTE TPI project, may the State or LEA use High School CTE TPI funds to replace some of those State or local funds?**

Like many Federal grant programs, Perkins has a “supplement, not supplant” requirement. Therefore, grantees are prohibited from using High School CTE TPI funds in ways that supplant non-Federal funds that support career and technical education activities, including State and local funds that support the High School CTE TPI project.

Like a grantee under other Department programs, High School CTE TPI grantees must ensure that all expenditures of High School CTE TPI funds are for costs that are reasonable and
necessary, and that meet applicable cost principles in 2 CFR Part 200, and are used consistent with all applicable Federal, State, and local laws and regulations.

E-10. **Must a grantee wait until the start of the initial budget period to begin incurring costs that its High School CTE TPI award will reimburse?**

No. A grantee may use its High School CTE TPI funds to reimburse itself for pre-award costs that are reasonable, necessary, and otherwise allowable when these costs were incurred not more than 90 days before the Department’s award. See 2 CFR § 200.308(d)(1).

Thus, in anticipation of receiving a High School CTE TPI grant, an applicant may begin carrying out tasks for its proposed project before receiving an award. If the Department issues an award to the applicant, for example, on September 30, 2017, the grantee may reimburse itself for costs that are allowable charges to the High School CTE TPI grant and that were incurred on or after July 2, 2017.

However, until notified of its receipt of a grant award, an applicant bears the risk of committing its own funds to these pre-award costs. If the applicant is not awarded a High School CTE TPI grant, the Department will not reimburse the applicant for any costs it incurred in anticipation of a possible grant award.

E-11. **May High School CTE TPI funds support training stipends for teachers?**

Yes. High School CTE TPI funds may support these stipends if they are reasonable and necessary to support the purpose of the project and complies with the supplement not supplant requirements provisions in Section 311 of Perkins IV. Applicants should include these stipends separately in the “Other” line of Form 524 and provide an explanation in the budget narrative.

E-12. **May grant funds be used to pay for tuition as a strategy to recruit and retain teachers for CTE programs that align to an In-Demand Industry Sector or Occupation?**

Yes. High School CTE TPI funds may be used to pay for tuition if the cost is reasonable and necessary to support the purpose of the project. Applicants should include these costs separately in the “Other” line of Form 524 and provide a justification in the budget narrative.

E-13. **If an applicant intends to charge indirect costs to the grant, what information should it submit with its application?**

Because the High School CTE TPI has a supplement, not supplant requirement, each grantee must use a restricted indirect cost rate, rather than an unrestricted indirect cost rate, to charge indirect costs to the High School CTE TPI grant. See 34 CFR §§ 75.563 and 76.564 – 76.569. The applicant should include an estimated amount of indirect costs in the “Indirect Costs” line of its Form 524, provide the other information this form requests, and include an explanation of these costs in the budget narrative.

In addition, if an applicant has a current approved restricted indirect cost rate, it should submit with its application a copy of its current indirect cost rate agreement that identifies its current restricted rate. Please see the High School CTE TPI application package for additional
information on how to submit this information as an attachment to the application. If the applicant’s indirect cost rate has expired it should discuss options with its cognizant agency on how to update the expired indirect cost rate.

If an applicant does not have an approved indirect cost rate agreement that identifies a currently available restricted indirect cost rate, see E-15.

**E-14. Assuming that an applicant submits a request to its cognizant agency a request for a negotiated indirect cost rate within 90 days of receipt of a High School CTE TPI grant award, how should the applicant budget for indirect costs in its application, and charge indirect costs after receipt of its award?**

Pending receipt of its approved restricted indirect cost rate, an applicant may budget indirect costs, and if awarded a grant a grantee may charge indirect costs, based on a temporary rate of 8 percent of budgeted direct salaries and wages, until it negotiates a restricted rate (see 34 CFR 76.564(c)(2)).

**Note:** If you have questions about either of these indirect cost rate options or applying your indirect cost rate, more information is available on the Department’s website at: [http://www2.ed.gov/policy/fund/guid/uniform-guidance/index.html](http://www2.ed.gov/policy/fund/guid/uniform-guidance/index.html). In addition, contact information for the Department’s Indirect Cost Group is available at: [http://www2.ed.gov/about/offices/list/ocfo/fipao/icgreps.html](http://www2.ed.gov/about/offices/list/ocfo/fipao/icgreps.html).