



**Office of Career, Technical, and Adult Education
Division of Academic and Technical Education**

**FY 2017 Monitoring Plan for
State Formula Grants
Funded under the Carl D. Perkins
Career and Technical Education Act of 2006
(Perkins IV)**

Revised September, 2016

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Executive Summary

The Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV) is a principal source of federal funds for the improvement of secondary and postsecondary career and technical education programs across the nation. Its purpose is to develop more fully the academic, career, and technical skills of secondary and postsecondary students who elect to enroll in career and technical education programs.

Congress has appropriated, in each year since passage of the legislation, approximately \$1.1 billion in Perkins IV funding, including \$1.1 billion for basic State formula grants (Title I)¹ and discretionary grants under the Native American Career and Technical Education Program (NACTEP, \$14 million), Native Hawaiian Career and Technical Education Program (NHCTEP, \$8.2 million), and Tribally–Controlled Postsecondary Career and Technical Institutions Program (TCPCTIP, \$7.7 million).² Congress also has appropriated over \$7 million in national activities funds to support a national center for career and technical education, a national assessment of career and technical education, and other discretionary projects—awarded through grants, cooperative agreements, and contracts—to support high-quality career and technical education across the nation.

The Office of Career, Technical, and Adult Education’s (OCTAE) Division of Academic and Technical Education (DATE)—the unit that oversees the administration, implementation, and accountability of the Perkins grants—implements an annual monitoring plan for State formula and discretionary grants funded under the law. The overarching purpose of DATE’s monitoring plan is to uphold the Department’s fiduciary responsibility in protecting against waste, fraud, and abuse of Federal funds, ensure that States and discretionary grantees effectively comply with the requirements of the law and applicable Department statutes and regulations (including the Education Department General regulations); and are making substantial progress toward achieving its stated goals and objectives.

States and discretionary grantees are selected for monitoring each year based on a comprehensive risk analysis, DATE’s workplan, and available travel funds. Depending on its level of risk, each State and discretionary grantee is scheduled for either a full or targeted visit which may be conducted on site or virtually. Beginning last year, DATE instituted a policy in which each State would receive a full, on-site visit once during the life of a given Act and that any subsequent visits would be targeted to specific issues and needs of the State arising from risk analyses or known to DATE staff.

¹ States include the District of Columbia, Puerto Rico, Guam, Palau, and the Virgin Islands.

² Although Perkins IV authorized State formula grants under Title II (tech prep education) please note that Congress discontinued appropriations under Title II in FY 2011.

The following seven States were selected for on-site monitoring during FY 2017: Connecticut, California, Idaho, Michigan, New Hampshire, Puerto Rico and Wyoming. Please note that the State of Wyoming's monitoring visit was rescheduled to the current FY 2017 monitoring cycle from the previous fiscal year.

This plan, which fully describes the DATE monitoring process, is organized into four sections. Section I briefly describes the purpose, objectives, and goals of the Perkins IV grants. Section II describes the risk-based analysis employed to select States and discretionary grants for monitoring each year, along with the strategy used before, during, and after monitoring visits. Section III identifies States and discretionary grants for monitoring this year and provides a rationale for their selection. Section IV describes DATE's evaluation of its processes to improve the quality and timeliness of its monitoring activities.

I. Background on Perkins IV Grants

The Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV) is a principal source of federal funding to States and discretionary grantees for the improvement of secondary and postsecondary career and technical education programs across the nation. Its purpose is to develop more fully the academic, career, and technical skills of secondary and postsecondary students who elect to enroll in career and technical education programs by:

- Building on the efforts of States and localities to develop challenging academic standards and to assist students in meeting such standards, including preparation for high skill, high wage, or high demand occupations in current or emerging professions;
- Promoting the development of services and activities that integrate rigorous and challenging academic and career technical instruction, and that link secondary and postsecondary education for participating career and technical education students;
- Increasing State and local flexibility in providing services and activities designed to develop, implement, and improve career and technical education, including tech-prep education;
- Conducting and disseminating national research and disseminating information on best practices that improve career and technical education programs, services, and activities;
- Providing technical assistance that: a) promotes leadership, CTE teacher preparation, and professional development; and b) improves the quality of career and technical education teachers, faculty, administrators, and counselors;
- Supporting partnerships among secondary schools, postsecondary institutions, baccalaureate degree granting institutions, area career and technical education schools and intermediaries; and
- Providing individuals with opportunities throughout their lifetimes to develop, in conjunction with other education and training programs, the knowledge and skills needed to keep the United States competitive.

States are awarded funds via formula prescribed in Title I, Section 111 (for the 50 States, District of Columbia, and Puerto Rico) and Section 115 (for Guam and Palau) of Perkins IV. From its Title I

funds, States must award no less than 85 percent to eligible recipients via formula also prescribed in law. Eligible recipients are local educational agencies and postsecondary institutions, community colleges, and other public and private nonprofit institutions, including charter schools, that offer career and technical education programs that meet the requirements of the law. States determine what share of their 85 percent of funds will be awarded to eligible recipients at the secondary versus postsecondary level (the national split of funds hovers around 62/38). The remainder of Title I funds is spent on State administration activities (up to five percent) and State leadership activities (up to ten percent) described in Sections 121(a) and 124(b)-(c) of Perkins IV, respectively.

II. Risk-Based Grant Monitoring Strategy

Prior to the selection of States for monitoring each year, DATE conducts a comprehensive risk analysis that takes into account the last time a State received a full on-site visit, their current fiscal status, audit findings, grant award conditions, and performance data. See Attachment A. Based on these risk factors, grantees are organized into one of three levels of differentiated risk:

- Low Risk – routine monitoring may be appropriate
- Elevated Risk – increased monitoring frequency and/or intensity may be appropriate
- Significant Risk – increased monitoring frequency and intensity are appropriate

Discretionary grantees are reviewed for level of risk based on grant award size, last time visited and administrative and program issues known to DATE project officers. As appropriate, DATE staff also considers information from the Department's Grants Administration and Payments System (GAPS/G5) (for grants) and the Invoice Processing Platform (IPP) (for contracts).

Based on DATE's annual workplan and available travel funds, a determination is made about the number of reviews that can be effectively accomplished during the program year. States and discretionary grantees with the highest levels of risk are then scheduled for either a full or targeted review which may be conducted on site or virtually. Full reviews are week-long visits that address compliance with respect to six topical areas: State program administration, fiscal program responsibility, local applications, accountability, programs of study, and special populations. Targeted visits are approximately three-day visits that address one or more of the topical areas depending on the issues and needs of the State or discretionary grantee.

Beginning last year, DATE instituted a policy in which each State would receive a full, on-site visit once during the life of a given Act. Subsequent visits to a State would be targeted to specific issues and needs of the State arising from risk analyses or known to DATE staff.

Prior to each monitoring visit, DATE staff host a pre-briefing with OCTAE leadership to discuss the State or discretionary grantee risk factors and the planned agenda for the visit. During each visit, DATE staff review documentation and interview key staff pursuant to a prescribed set of checklist items (for State formula grantees) or interview protocols (for discretionary grantees). Following each visit, DATE hosts a post-briefing for the Assistant Secretary and other OCTAE leadership to share key findings and suggested improvement strategies that will be included in the final monitoring report.

Within sixty days after the visit, a formal monitoring report is issued to the State or discretionary grantee indicating areas of non-compliance (findings), corrective actions, if any, and suggested improvement strategies. Corrective actions must be submitted to DATE with the timeframe established in the report or otherwise negotiated with DATE staff. The DATE staff coordinates

extensive follow-up to ensure that all corrective actions are addressed and closed in a timely fashion. A letter is issued to the State or discretionary grantee to officially close out the monitoring report once all corrective actions have been satisfied.

III. States Selected for Monitoring Visits in FY 2017

Based on the risk analysis conducted during the month of August 2016, seven States were identified for on-site monitoring visits schedule for the FY 2017 Perkins monitoring cycle:

- The State of **Connecticut** has not received an on-site monitoring visit in the past *seven* years.
- The State of **California** has not received an on-site monitoring visit in the past *eight* years.
- The State of **Idaho** failed to meet its adjusted performance levels for 5P1 by the 90 percent level for three consecutive years and 5P2 by the 90 percent level for three consecutive years. The State has not received a full monitoring visit in the past *twelve* years.
- The State of **Michigan** has not received an on-site monitoring visit in the past *seven* years.
- The State of **New Hampshire** has not received an on-site monitoring visit in the past *eight* years.
- Although the Commonwealth of **Puerto Rico** was last visited in 2014, it is important to note that during FY 2016, the Department imposed special conditions on *all* grants awarded to the Puerto Rico Department of Education.
- The State of **Wyoming** failed to meet its adjusted performance levels for 1S2 by the 90 percent level for three consecutive years and has not received a monitoring visit in the past *seven* years.

Please review Attachment B which provides a draft FY 2017 Perkins monitoring schedule and a tentative budget for the reviews.

IV. Monitoring Evaluation

Following each monitoring cycle (typically in late October or early November), DATE sends an evaluation survey to each State that has been monitored. This process has provided States with an opportunity to rate various aspects of the on-site and follow-up monitoring processes, as well as to offer suggestions for improvement. States rate the following elements:

- The length, format, and content of the visit.
- The format and content of the follow-up report.
- The extent to which the State has implemented the corrective actions and/or suggested improvement strategies identified in the follow-up report.
- The extent to which the visit helped the State to improve their Perkins State administration, implementation, and accountability efforts.

The evaluations of the DATE monitoring outcomes have been consistently positive. States report that monitoring visits contribute to substantial improvements in State and local level implementation of Perkins IV, particularly as they relates to administration of career and technical education and enhancing performance and accountability systems.

FY 2017 DATE RISK ANALYSIS ELEMENTS

Total Maximum Points = 155

I. ACCOUNTABILITY RISK ANALYSIS FACTORS AND SCALES

(Maximum points 90)

A. Missed Performance Levels (20 points maximum)

Rubric Score

- 0 points if state met all indicators for program year
- 5 points if state missed 1-3 indicators.
- 10 points if state missed between 4-7 indicators.
- 15 points if state missed between 8-10 indicators.
- 20 points if state missed between 11-14 indicators.

Note: Palau only reports on 4 indicators. Therefore, for Palau the scale is: 5 points if they have missed 2 indicators; and 10 points if they have missed 3 or more indicators.

B. Number of Indicators that failed to meet at least 90% of the agreed upon performance levels (20 points maximum)

Rubric Score

- 0 points if state met at least 90% of the agreed upon performance levels for all indicators.
- 5 points if state failed to meet 90% of the agreed upon performance level on 1-3 indicators.
- 10 points if state failed to meet 90% of the agreed upon performance level on 4-7 indicators.
- 15 points if state failed meet at least 90% of the agreed upon performance level on 8-10 indicators.
- 20 points if state failed to meet at least 90% of the agreed upon performance level on 11-14 indicators.

C. Extended Time Required to Implement an Improvement Plan (10 points maximum)

Rubric Score

- 0 points if state met at least 90% of the agreed performance levels for all indicators in the program year
- 5 points if state failed to meet at least 90% of the agreed upon performance levels on one of the indicators for 3-4 consecutive years
- 10 points if state failed to meet at least 90% of the agreed upon performance levels on one of the indicators for 5-7 consecutive years

D. Quarterly Reports Submitted (10 points maximum)

Rubric Score

- 0 points if quarterly reports were submitted on time
- 5 points if quarterly reports were submitted late but before the next report was due
- 10 points if quarterly reports were consistently submitted late or not submitted

E. Missing Enrollment Data (10 points maximum)

Rubric Score

- 0 points if state submitted all the required data.
- 5 points if state submitted partial enrollment data.
- 10 points if state failed to submit any enrollment data.

F. Missing Indicator or Subpopulation (10 points maximum)

Rubric Score

- 0 points if all subpopulation data was reported.
- 5 points if at least 1 indicator or subpopulation data set was not provided for a particular indicator.
- 10 points if 2 or more indicators or subpopulation data sets were not reported.

G. State Completed its Consolidated Annual Report during the Specified Time (5 points maximum)

Rubric Score

- 0 points if state submitted all the required reporting sections of the Consolidated Annual Report within the specified time frame.
- 5 points if state failed to submit all the required reporting sections of the Consolidated Annual Report within the specified time frame.

H. State Completed al FAUPL Negotiations during the Specified Time (5 points maximum)

Rubric Score

- 0 points if state finalized their FAUPL negotiations within the specified time frame.
- 5 points if state failed to finalize their FAUPL negotiations within the specified time frame.

II. FISCAL RISK ANALYSIS FACTORS AND SCALES

(Maximum points 40)

A. **Lapsed funds-most current final FSR** (10 points maximum)

Rubric Score

- 0 points if state did not lapse any Perkins IV funds.
- 5 points if state lapsed its remaining Perkins IV funds between 0.00001% - 1%
- 10 points if state has lapsed more than 1% of its Perkins IV funds.

[**Lapsed funding:** The portion of unused Perkins IV grant award balance that becomes unavailable as a result of an unobligated grant award balance; and/or, a failure to "draw down" available funds within the required timeframe.]

B. **Program Specific Audit Findings** (10 points maximum)

Rubric Score

- 0 points if state has no audit findings in the category of matching and maintenance of effort / sub-recipient monitoring, earmarking, allowable costs, cost principles and cash management.
- 5 points if state has at least one earmarking, allowable costs, cost principles, and cash management findings in the last seven years; and/or the State has at least one sub-recipient monitoring finding in the last seven years.
- 10 points if state has at least one (1) "maintenance of effort" and/or "matching" finding in the last seven years.

C. **Audit Unmodified opinion (formerly called unqualified)** (5 points maximum)

Rubric Score

- 0 points if state's A-133 audit contained an unmodified opinion.
- 5 points if state's A-133 audit did not contain an unmodified opinion.

D. **Late Liquidation of funds** (15 points maximum)

Rubric Score

- 5 point if state had a remaining balance of \$199,000 or less, at the end of the program year
- 10 points if state had a remaining balance of \$200,000 to \$399,999 at the end of the program year.
- 15 points if state had a remaining balance of \$400,000 and above, at the end of the program year.

III. PROGRAM ADMINISTRATION

(Maximum points 60)

A. **Last Time Monitored** (20 points maximum)

Rubric Score

- 0 points if state received a Monitoring visit (on-sight or virtual) within the last 0-2 years.
- 10 points if state received a Monitoring visit (on-sight or virtual) within the last 3-4 years.
- 15 points if state received a Monitoring visit (on-sight or virtual) within the last 5-6 years.
- 20 points if state received a Monitoring visit (on-sight or virtual) within the last 7 or more years.

Period Covered

January of 2010 (2010 monitoring cycle) thru September 2016 (2016 monitoring cycle)

B. **Changes in State Director within the last two years** (5 points maximum)

Rubric Scale

- 0 points if the State CTE Director position has not changed in the last 2 years.
- 5 points if the State CTE Director position changed in the last two years.

FY 2017 Perkins Monitoring Schedule Perkins IV

Perkins IV Grantee	Type of Visit	Date of Visit	Monitoring Team/ Areas of Review <small>(Team Lead denoted in bold font)</small>
Wyoming	Targeted*	November 14-18, 2016	Marilyn Fountain – Local Application <u>Andy Johnson</u> - Fiscal <u>Jay Savage</u> - Accountability; Special Populations
Connecticut	Targeted	Tentative March 2017	Len Lintner – Local Application; Fiscal <u>Sharon Head</u> – Accountability; Special Populations <u>Christine Jackson</u> – RMS
New Hampshire	Targeted	Tentative March 2017	Len Lintner – Local Application; Fiscal <u>Jose Figueroa</u> - Accountability; Special Populations**
California	Targeted	February 6-10 & 13-15 2017	Andy Johnson – Fiscal/Secondary; Len Lintner : Fiscal/Postsecondary; Local Application <u>Laura Messenger</u> – Programs of Study <u>Jose Figueroa</u> - Accountability; Special Populations <u>Iyauta Green</u> – RMS <u>Mark Robinson</u> – RMS
Michigan	Targeted	Tentative April 2017	Marilyn Fountain – Local Application <u>Len Lintner</u> - Fiscal <u>Sharon Head</u> - Accountability; Special Populations <u>Susan Benbow</u> – RMS
Idaho	Targeted	Tentative May 2017	Len Lintner – Fiscal Local Application <u>Edward Smith</u> – Local Application Fiscal <u>Jamelah Murrell</u> – Accountability; Special Populations
Puerto Rico	Targeted	Tentative September 2017	Marilyn Fountain – Local Application <u>Andy Johnson</u> – Fiscal/Secondary; <u>Len Lintner</u> – Fiscal/Postsecondary <u>Jose Figueroa</u> – Accountability; Special Populations <u>Lorena Amaya-Dickerson</u> – RMS
Virgin Islands	Off-site technical assistance	TBD/2017	Len Lintner – Coordinate intensive DATE technical assistance
** Accountability; Special Population will be conducted remotely			

DATE Staff Listing by State and Responsibility

States	Program Administration Liaisons (PAL)	College and Career Transitions Specialists (CCTS)	Regional Accountability Specialists (RAS)	Audit Resolution Specialists (ARS)
Alabama	Marilyn Fountain	Sherene Donaldson	Jay Savage	Rosanne Andre
Alaska	Andy Johnson	Laura Messenger	Jose Figueroa	Rosanne Andre
Arizona	Marilyn Fountain	Laura Messenger	Jose Figueroa	Rosanne Andre
Arkansas	Andy Johnson	Laura Messenger	Jay Savage	Rosanne Andre
California	Andy Johnson	Laura Messenger	Jose Figueroa	John Miller
Colorado	Marilyn Fountain	Laura Messenger	Jose Figueroa	Rosanne Andre
Connecticut	Len Lintner	Laura Messenger	Sharon Head	Rosanne Andre
Delaware	Len Lintner	Laura Messenger	Allison Hill	Rosanne Andre
DC	Len Lintner	Sherene Donaldson	Jay Savage	Rosanne Andre
Florida	Marilyn Fountain	Sherene Donaldson	Jay Savage	John Miller
Georgia	Marilyn Fountain	Sherene Donaldson	Jay Savage	John Miller
Guam	Andy Johnson	Sherene Donaldson	Jamelah Murrell	Rosanne Andre
Hawaii	Len Lintner	Laura Messenger	Jose Figueroa	Rosanne Andre
Idaho	Len Lintner	Laura Messenger	Jamelah Murrell	Rosanne Andre
Illinois	Marilyn Fountain	Sherene Donaldson	Sharon Head	John Miller
Indiana	Marilyn Fountain	Laura Messenger	Jose Figueroa	Rosanne Andre
Iowa	Andy Johnson	Sherene Donaldson	Allison Hill	John Miller
Kansas	Andy Johnson	Laura Messenger	Jay Savage	Rosanne Andre
Kentucky	Marilyn Fountain	Sherene Donaldson	Allison Hill	Rosanne Andre
Louisiana	Marilyn Fountain	Laura Messenger	Jay Savage	Rosanne Andre
Maine	Len Lintner	Laura Messenger	Sharon Head	Rosanne Andre
Maryland	Len Lintner	Sherene Donaldson	Jamelah Murrell	Rosanne Andre
Massachusetts	Len Lintner	Laura Messenger	Sharon Head	Rosanne Andre
Michigan	Marilyn Fountain	Sherene Donaldson	Sharon Head	Rosanne Andre
Minnesota	Marilyn Fountain	Laura Messenger	Sharon Head	Rosanne Andre
Mississippi	Marilyn Fountain	Sherene Donaldson	Jamelah Murrell	Rosanne Andre
Missouri	Marilyn Fountain	Sherene Donaldson	Allison Hill	Rosanne Andre
Montana	Andy Johnson	Laura Messenger	Jamelah Murrell	John Miller
Nebraska	Andy Johnson	Sherene Donaldson	Allison Hill	Rosanne Andre
Nevada	Len Lintner	Laura Messenger	Jose Figueroa	Rosanne Andre
New Hampshire	Len Lintner	Laura Messenger	Jose Figueroa	Rosanne Andre
New Jersey	Len Lintner	Laura Messenger	Jay Savage	John Miller
New Mexico	Andy Johnson	Sherene Donaldson	Jose Figueroa	Rosanne Andre
New York	Len Lintner	Sherene Donaldson	Jamelah Murrell	John Miller
North Carolina	Marilyn Fountain	Sherene Donaldson	Jay Savage	John Miller
North Dakota	Len Lintner	Laura Messenger	Allison Hill	Rosanne Andre
Ohio	Marilyn Fountain	Laura Messenger	Sharon Head	John Miller

States	Program Administration Liaisons (PAL)	College and Career Transitions Specialists (CCTS)	Regional Accountability Specialists (RAS)	Audit Resolution Specialists (ARS)
Oklahoma	Marilyn Fountain	Laura Messenger	Jamelah Murrell	Rosanne Andre
Oregon	Len Lintner	Laura Messenger	Jose Figueroa	Rosanne Andre
Palau	Andy Johnson	Sherene Donaldson	Jamelah Murrell	Rosanne Andre
Pennsylvania	Len Lintner	Sherene Donaldson	Jay Savage	John Miller
Puerto Rico	Marilyn Fountain	Sherene Donaldson	Jose Figueroa	John Miller
South Carolina	Marilyn Fountain	Sherene Donaldson	Jay Savage	Rosanne Andre
South Dakota	Len Lintner	Laura Messenger	Jamelah Murrell	Rosanne Andre
Tennessee	Len Lintner	Sherene Donaldson	Allison Hill	Rosanne Andre
Texas	Andy Johnson	Sherene Donaldson	Allison Hill	John Miller
Utah	Len Lintner	Laura Messenger	Jose Figueroa	Rosanne Andre
Vermont	Len Lintner	Laura Messenger	Jose Figueroa	Rosanne Andre
Virgin Islands	Len Lintner	Sherene Donaldson	Sharon Head	Rosanne Andre
Virginia	Marilyn Fountain	Sherene Donaldson	Jay Savage	Rosanne Andre
Washington	Andy Johnson	Laura Messenger	Jose Figueroa	Rosanne Andre
West Virginia	Len Lintner	Sherene Donaldson	Jay Savage	Rosanne Andre
Wisconsin	Marilyn Fountain	Sherene Donaldson	Allison Hill	John Miller
Wyoming	Marilyn Fountain	Laura Messenger	Jay Savage	Rosanne Andre

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