

Perkins Grant Management FAQs

Q: What is the policy is for Perkins travel that is canceled due to the coronavirus? Can you please provide guidance on how we should manage associated fees, non-refundable costs for travel booked, but which now must be canceled due to concerns about the virus and resulting canceled conferences, as well as canceled travel due to a change in district or college policy?

A: Federal regulations in EDGAR at 34 CFR Part 76.707 indicate when obligations of grant funds are made. Specifically, it states in §76.707(f) that travel is obligated “when the travel is taken.”

For example, travel costs such as plane tickets can be charged to the grant when the boarding pass is scanned when the person gets on the plane or hotel rooms can be charged as of the point that the traveler checks in.

Registration for a conference is not necessarily considered a travel cost, and would be considered obligated at the point at which it is nonrefundable because the benefit of the registration is that it held the attendee’s seat at the event. In the event that the event is canceled and a refund cannot be given, registration is less of a risk to charge to the grant than travel that was not taken.

We have contacted the U.S. Department of Education to better understand where there might be flexibility in the federal grant regulations given various levels of governments’ recommendations and requirements around closures and travel with regard to COVID-19 and while additional information may become available in the future, there is currently no exception granted to the federal requirements noted above.

Our recommendation is that grant recipients act according to their internal protocols, document their decisions, and maintain that documentation. It is also recommended that Perkins plans are revised prior to April 15, or in consultation with the Perkins Plan Manager after that date, to update travel related action steps and potentially use those funds for other purposes if travel restrictions have been implemented locally. Additionally, it would be a requirement that any travel vouchers received as part of a cancellation be used for future support of CTE if originally purchased with federal funds.

Q: My institution is planning to purchase equipment or other materials as part of our Perkins application for the current fiscal year, but I’m concerned that it might not arrive by June 30 as required by federal guidance. Is there any flexibility in when purchases are received given the current supply chain interruptions caused by COVID-19?

A: As mentioned in the above FAQ, we are waiting on any supplemental guidance or flexibility in the requirement that grant purchased items be received by June 30, but it is unknown what that guidance will permit. If you are aware now that equipment or supplies purchased with grant funds will not arrive by June 30, unfortunately, the order should be canceled or paid for from another funding source. Additionally, the local plan should be revised by April 15 and adjusted so that those funds can be re-purposed and not left unspent. Revisions needed after April 15 will be handled on a case-by-case basis.

Q: If I have employees paid in whole or in part by the federal Perkins grant, and our organizations policies about leave, alternate work schedules, etc., change in response to COVID-19, what parts of those employees' salaries can be covered by the grant and is there additional documentation that should be retained as support?

A: Personnel costs, including salaries, that are in the grant application are an allowable expense. If personnel policies change as part of the entity's COVID-19 response, employees funded with grant dollars would still need to maintain the required time and effort documentation normally required and the grant recipient should also retain documentation of the change in organizational policy with its records. Federal grant guidance at [2 C.F.R. § 200.430](#) details requirements related to personnel compensation and stipulates that federally funded employees should receive consistent treatment in terms of salaries, benefits, etc. as non-federally funded employees.

Colorado CTSO State and National Conferences FAQs

Q: Is my State Career and Technical Student Organization (CTSO) Conference Canceled due to COVID-19?

A: As of today (3/13/2020), the Governor has limited all public gatherings in Colorado to Colorado to a size of 250 participants or less unless a minimum of 6 feet between attendees can be assured. Because CTSO State conferences that have not yet occurred have contracts with venues, we are working with legal counsel and the venue sites to determine cancellations as well as whether refunds will be possible. While students and safety are at the heart of the decision-making process, CTSO state advisors are working to make decisions to best benefit both students now and in the future as conference cancellations also have an effect on the organization's future financial viability. We understand and respect that each district and college will be required to meet their specific travel processes moving forward. We also honor and respect the need to keep all of Colorado safe. However, it might be our best financial option to still host versus cancelling our contracts. We will be in touch next week with an update, which will also be available on our website www.coloradostateplan.com. The CTSO's State Advisor will also communicate to all CTSO chapters directly.

Q: Is the national conference for my CTSO canceled?

A: Please refer to the website of your national organization (HOSA, DECA, FBLA, FCCLA, TSA, SkillsUSA, and FFA) for their most up-to-date information and pay close attention to their submission deadlines. Your district/college may want to wait until as close to that time as possible to make a decision before committing resources. At the present time, we are not aware of any cancellations of national conferences for reasons similar to those noted above.