



California Community Colleges

Introduction to the California Postsecondary Perkins V Manual and Grants Guidance Updates

MAY 2025 WEBINAR

Frequently Asked Questions (FAQs)

Should you have any questions not covered by this document, please submit a help desk request in NOVA: [NOVA Help Desk](#) or email PerkinsSupport@CCCCO.edu.

General Questions

- 1. Is it allowable to use state federal funds to purchase decorations for year-end student events?**

Response:

Decorations would not be an allowable use of federal Perkins funds. Allowable items should contribute to program improvement or increase student outcomes.

- 2. Is it allowable to use administration funds to purchase equipment?**

Response:

The purchase of the equipment must be allocable. If the equipment you are buying does not benefit from the Perkins administrative cost objective, it is not allocable to Perkins admin, therefore, not allowable. (Reference: 2 CFR § 200.405)

- 3. Is an approved plan on NOVA considered “prior written approval”?**

Response:

Each application in NOVA contains a certification page, stating that grantees must follow Perkins rules and regulations while using Perkins funds. If the district shares the type of equipment they intend to purchase along with the reasonable amount, and aligns with district policy, the certification is considered prior written approval. Once the equipment is available for purchase, and the item is worth \$10,000 and over, then the district must submit an equipment justification review request via email to the regional monitor before the equipment is purchased.

- 4. If our college defines equipment at a lower threshold (e.g., \$500), must the college report on items as equipment that are above our internal threshold, but below the federal standard of \$10,000?**

Response:

The college can maintain a \$500 threshold; however, it is strongly recommended that if there are technological items under the threshold that they are tagged, and the procedures under 2 CFR § 200.313 (d) are followed.

5. **In the example of a college having purchased a 3D printing machine bought in 2022, with fair market value less than \$10,000, the machine was no longer in use for instruction, but still functional. To confirm the correct process, would the college need to: notify the Chancellor's Office, sell equipment, and then return the federal share of the proceeds?**

Response:

Correct.

6. **To confirm, is Fair Market Value (FMV) based on purchase price (years ago) or current FMV/sale price?**

Response:

The purchase price would be the current fair market value.

7. **Our district internally codes items over \$200 as equipment using object code 96. Does this mean we are required to report these items under object code 94 (Supplies & Materials) in NOVA if they are under \$10,000?**

Response:

Equipment under \$10,000 should be recorded under the supplies and materials category.

8. **Does this mean we should be coding technology/computers as a 4000 series expense in fiscal reporting rather than the 6000 series?**

Response:

Correct, if the technology /computer is under \$10,000.

9. **I understood that meals were not allowable for hosting conferences; however, slide 29 suggests that we can cover meals if hosting a conference. Can you please clarify?**

Response:

In general, according to Federal rules (Conferences- 2 CFR § 200.432), the purchase of food is not an allowable expense. It is not recommended to use Federal funds to pay for food.

However, under certain circumstances, food provided for conferences, meetings, or workshops may be allowable.

10. **Can you use Perkins fund to pay for food for Career Technical Education (CTE) advisory board meetings?**

Response:

All grant expenditures, including those for food, beverages, or snacks, must be reasonable, necessary, allocable to the grant, and allowable. (Office of Management and Budget's (OMB) Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance) at 2 CFR § 200.403 through 200.405.) There may be limited circumstances under which providing food or beverages is reasonable and necessary to achieve the purpose of a particular grant. Because food and beverage costs are not of a type generally recognized as ordinary and necessary for the operation of the grantee or the proper and efficient performance of the Federal award (see 2 CFR § 200.404(a)), grantees must

document their evidence and analysis that justify that the use of food or beverage is reasonable and necessary in each instance. It is recommended to find a different funding source.

11. What about sponsorship of a conference? Our Early Childhood Education (ECE) program would like to co-sponsor an event for our ECE students and current practitioners in our local area. The training is specific to training educators in our local area about current trends in our field for both public and private programs.

Response:

When a grantee is hosting an event related to its Perkins grant, the grantee should first consider structuring the agenda for the meeting so that there is time for participants to bring or purchase their own food, beverages, and snacks. In addition, when planning a meeting, grantees may want to consider a location in which participants have easy access to food and beverages. There are limited circumstances where food is necessary and reasonable. It is recommended to find a different funding source.

Participant Support Costs

12. What are some examples of participant support costs?

Response:

The Uniform Grant Guidance (UGG) in 2 CFR § 200.1 defines participant support costs as direct costs that support participants and their involvement in a federal award, such as stipends, subsistence allowances, travel allowances, registration fees, temporary dependent care, and per diem paid directly to or on behalf of participants. The UGG, also in 2 CFR § 200.1, defines a participant as an individual participating in or attending program activities under a federal award, such as training or conferences, but not responsible for implementing the federal award. This would not apply to individuals committing efforts to the development or delivery of program activities under a federal award, such as consultants, project personnel, or staff members of a recipient or subrecipient.

13. With regards to participant support costs, are stipends allowable for transportation costs—say the example is for internship job placements?

Response:

Stipends for transportation costs must be aligned with your Comprehensive Local Needs Assessment (CLNA). One circumstance where it may be allowable, is where you are providing transportation for members of special populations for them to participate in your CTE programs, as they may be economically disadvantaged.

- 14. Can you describe the difference for participant support costs focused on personal development, and does it differ from providing student aid to students - wrap around services such as books, course materials, gas cards, etc.? Would any student aid or field trip costs be considered participant support costs?**

Response:

Regarding student aid, this is not allowed. However, regarding field transportation costs, these are allowed.

- 15. Could participant support cost include mandatory personal protective equipment? (welding masks, steel-toed boots, firefighter turnout coats, etc.)**

Response:

Direct costs that support participants (see definition for Participant in 2 CFR § 200.1) and their involvement in a federal award, such as stipends, subsistence allowances, travel allowances, registration fees, temporary dependent care, and per diem paid directly to or on behalf of participants.

Time and Effort

- 16. Regarding stipends for faculty or release time to attend professional development (PD) activities, do they need to complete a time and effort form?**

Response:

Anyone who paid with federal funds, that period is required to maintain time and effort, even if it is a short amount of time, say a month. It must be in line with your written time and effort, policies, and procedures.

- 17. Are student assistants required to complete time and effort forms?**

Response:

In the event where students are employees, they must complete a time and effort form.

- 18. Will the Chancellor's Office provide compliant templates for Time and Effort Reporting?**

Response:

We are working on a compliant template for Time and Effort reporting that will be posted on our Perkins website.

- 19. Will the Bruman Group's "Perkins V Admin Handbook to EDGAR 6th Edition" be updated to this new material as well?**

Response:

Districts may contact the Bruman Group directly to order books or through their website [Publications – The Bruman Group, PLLC.](#)

Core Indicator Reporting

20. Is the 90% core indicator reviewed based on Taxonomy of Programs (TOP) code or based on overall college?

Response:

Core indicator reports can be viewed at the district, college and TOP code level by gender, race and special population.

21. Should districts have questions regarding our Core Indicator Rates being reported at the state level, who do we contact to do data validations with our internal teams?

Response:

Please reach out to our Chancellor's Office Management Information System (MIS) team at CCCMISEdit@CCCCO.edu.

22. Will the current three-year lag in Core Indicator data be improved? Is there a possibility that the data be improved to possibly a two year or one year lag?

Response:

The current two-year lag in core indicator data is due to the definition of concentrator. We take this lag into consideration when supporting districts with the local application.

23. Will the monitoring risk assessment for the core indicators be at the CTE cohort level only or at each of the disaggregated populations for each core indicator?

Response:

Our first step is to focus on each core indicator at the cohort level and then disaggregated by gender, race, TOP code and special populations.

24. How are Data Redacted (DR), Not Applicable (N/A), and Not Reported (N/R) populations treated in the risk assessment scoring? Colleges with smaller disaggregated populations could be at greater risk according to the risk assessment formula.

Response:

The N/A and N/R populations are not taken into consideration at the top level of selection. However, we invite districts/colleges to take the number of DR, N/A, and N/R into account during the Comprehensive Local Needs Assessment process.

Scoring and Monitor Site Visits

25. Will risk assessment scoring and monitoring be based on our 2025-26 Perkins application or on something else?

Response:

No, that scoring and monitoring will be based on the previous year. For instance, the 2024-25 risk assessment is based on 2023-24 data and performance.

26. When will a college be notified if they are selected for review?

Response:

We will notify the district program director and leadership via email if they are selected for additional monitoring and review. There will be an annual evaluation process. Please note that additional risk monitoring can occur at any time at the discretion of the Chancellor's Office.

27. In regard to the top three recipients with the highest scores, is that out of all the colleges in the state or per region or some other?

Response:

Districts are ranked from the highest to the lowest score based on the sum of points assigned to each risk factor. Please reference Attachment B: *District Selection Factor & Calculation Form* within the [2025 Monitoring and Technical Assistance Manual](#).

28. When and where do we find out our score?

Response:

If your district is selected for monitoring, you will receive a letter from the Chancellor's Office with more details.