



California Community Colleges

Introduction of the California Postsecondary Perkins V Manual

In Collaboration with
The Bruman Group, PLLC

May 28, 2025

Agenda



WELCOME AND
INTRODUCTIONS



HOUSEKEEPING



PERKINS V
MANUAL
OVERVIEW



UPDATES FOR
NEW
REGULATIONS
IMPACTING
FEDERAL
GRANTS



Q&A SESSION



UPCOMING KEY
DATES

Housekeeping

Questions

To best facilitate, please use the Q&A Feature. Questions may also be answered live.

Tech Support

Technical support is available, please email COWebinar@CCCCO.edu for questions.

Closed Captioning

Click the Closed Caption (CC) tab to read live captions



Recording

This session will be recorded and posted to the Perkins Program website after remediation.

Technical Assistance on the Perkins V Manual provided by The Bruman Group

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California Community Colleges

Purpose & the Chancellor's Office Role in Monitoring

Purpose and Roles

Assist community colleges in the administration of the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) by:

- Upholding the Division's fiduciary responsibility in protecting against waste, fraud, and abuse of federal funds;
- Expanding student opportunities to achieve national certification and credentials for CTE studies;
- Ensuring that eligible recipients effectively comply with the requirements of Perkins V and applicable statutes and regulations (including the Education Department General Administrative Regulations [EDGAR] at 34 CFR Part 76 and OMB Guidance for Federal Financial Assistance at 2 CFR Part 200); and
- Ensuring that eligible recipients are making substantial progress toward achieving their stated goals and objectives in their approved Perkins V application.

Chancellor's Office Role

- The CCCCCO is the “pass-through” agency for the 116 colleges across 72 community college districts

Chancellor's Office Role, continued...

- The pass-through must evaluate each subrecipient's risk of noncompliance with the Perkins award to determine appropriate subrecipient monitoring

Chancellor's Office Role, continued...

- Office of Career, Technical, and Adult Education (OCTAE) reminded CCCCCO of its monitoring responsibility during the last federal monitoring visit

Chancellor's Office Role, continued...

- As a result of the federal monitoring, the CCCCCO substantially revised the “Monitoring and Technical Assistance Manual”



California Community Colleges

Responsibilities of the CCCCCO

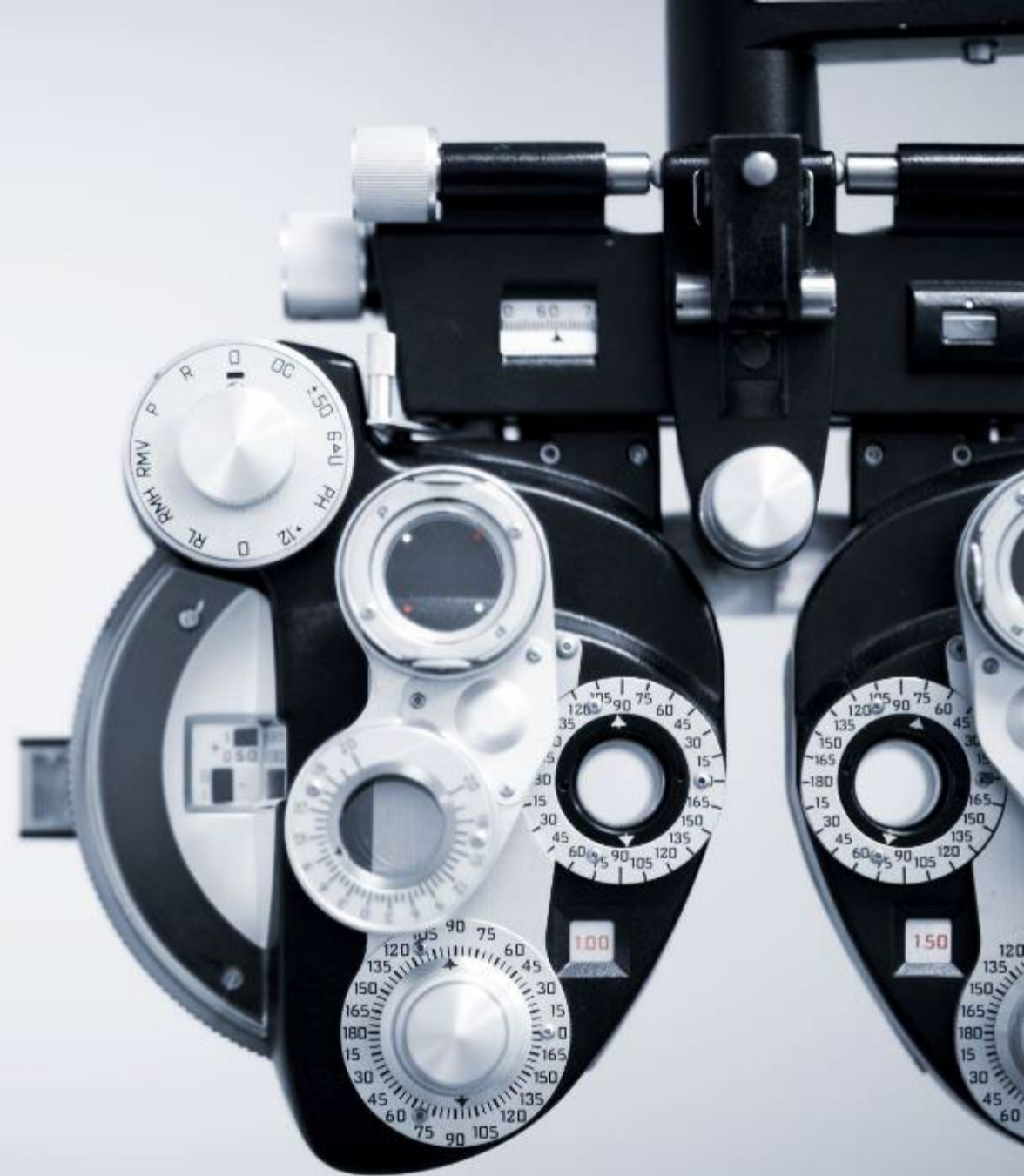
1. Review and approve local plans
2. Review and approve requests for reimbursement
3. Review and follow-up on Single Audit reports
4. Conduct risk management and monitoring

District Role

- Submit Year-To-Date Expenditures and Progress Reports on a quarterly basis;
- Submit final reports, which include program outcomes;
- Monitor to ensure core measure levels do not fall beneath the 90 percent threshold. Should they do, the district is required to develop and implement a Program Improvement Plan (PIP);
- Communicate with the Chancellor's Office, Perkins program staff to share PIP implementation strategies.

Monitoring Process

CCCCO will conduct a risk assessment based on specific risk factors!



Approach

- Risk Factors will be assigned points and the top three eligible recipients with the highest scores will be selected for monitoring. A college or district may be selected for special review based on the discretion of the Chancellor's Office.

Max Points	Risk Factors
25	Recipients whose single audit reports have identified problems with costs, lack of controls, or a system to identify costs charged to the grant/allocation
20	Recipients that failed to meet deadlines in submitting applications, expenditure reports, or final claims (15 days after due date)
15	Recipients that have not met their negotiated performance measures (below the 90% threshold)
15	Recipients that fail to use a significant portion of their grant/allocation funding (at least 25% by second quarter due date)
10	New district staff with little or no experience in managing the grant/allocation (recipients where persons in the coordinator role have changed will be viewed as new recipients)
5	Recipients that have revamped information systems or changed accounting rules/methods
5	Recipients that receive over \$250,000 in grant/allocation funds
5	Recipients not monitored in the past five years

Monitoring Process

- Team
- Time frame
- Pre-monitoring procedure



Five-step process

1. Assessment of Risk
2. Self-assessment
3. Desk review
4. Virtual meeting review
5. Site visit



District Selection

- Districts may be selected for special monitoring at the discretion of the CCCCCO

Scope of On-site Monitoring Visit

- See pages 11 to 13 of the manual





California Community Colleges

Monitoring Summary Report

The Monitoring Summary Report shall include:

- subrecipient information and the programs monitored;
- dates of the monitoring;
- who conducted the monitoring review;
- monitoring activities and procedures used to collect information;
- findings and references to applicable State and Federal requirements;
- corrective action recommendations, when the CAP is due, and where to send the CAP;
- program activities and eligible client population;
- monitoring staff's observations in areas, such as program strengths, weaknesses, concerns, etc.

Corrective Action Plan

1. Actions to be undertaken
2. District staff responsible for each action
3. A timeline for completing the action



New Regulations Impacting Federal Grants



EDGAR Changes

text = Added regulation in the updated EDGAR and bolded for importance

~~*text*~~ = Previously in the EDGAR that is removed in the updated version

76.50 - Basic Requirements for Subgrants

- Where not prohibited by law, regulation or terms and conditions of the grant award, States have subgranting authority under State-administered formula grant programs and can authorize a subgrantee to make subgrants
 - If subgranting, must comply with pass-through requirements in 2 CFR 200.332, including subrecipient monitoring
- If subgranting is prohibited, grantees may still contract for goods and services

UGG *FINAL* Changes

“These revisions will improve stewardship of Federal funds, promote equitable access to programs and services, reduce administrative burden for agencies, applicants, and recipients, and facilitate streamlined and effective oversight and implementation of Federal programs. Among other things, the revisions eliminate several prior approval requirements, increase multiple thresholds that trigger additional requirements, and clarify requirements for agencies and recipients.”

- OMB Memo M-24-11

Mandatory Disclosures – 200.113

- Mandatory disclosures (200.113): Applicant, recipients, and subrecipients must ***promptly*** disclose ***whenever it has credible evidence of the commission*** a violation of federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations under Title 18 or Civil False Claims Act (31 U.S.C. 3729–3733)
 - ***Includes both criminal and civil false claims actions***
 - Must be made in writing to the Federal agency, ***the agency's Office of Inspector General, and the*** pass-through entity (if applicable)
 - Also required to report matters to recipient integrity and performance (i.e. SAM and FAPIIS)
- ***Includes any activities or subawards in connection with the Federal award.***
- Failure to report can result in remedies for noncompliance (200.339).

Closeout & Liquidation – 200.344

- ***(a)*** Federal agency or pass-through ***must*** close out the award when it determines that all administrative actions and required work of the Federal award have been completed.
- ***(b)*** Recipient closeout reports: 120 days; subs: 90 days
- ***(c)*** SEA must liquidate within 120 days of obligation date
 - Complete scope of work
 - Finish accounting
 - Finalize draw-downs
- LEA has 90 days to liquidate ***(or an earlier date as agreed upon by the pass-through entity and subrecipient)***
 - ***When justified,** the Federal agency or pass-through entity may approve extensions for recipient or subrecipient.*

Basic Factors of Allowability - 200.403

To be allowable, a cost must:

- Be necessary, reasonable and allocable
- Comply with the cost principles and Federal award
- Be consistent with policies and procedures applying uniformly to Federal and non-Federal activities and costs
- Be consistently treated as either direct or indirect costs
- Be determined in accordance with GAAP
- Not be included or used to meet cost sharing / match requirements
- Be adequately documented
- ***Administrative closeout costs may be incurred until due date of the final reports. If incurred, these costs must be liquidated prior to the due date of the final report(s) and charged to the final budget period of the award unless otherwise specified by the Federal agency.***

All other costs must be incurred during the approved budget period.

Professional Development (PD)

Conferences – 200.432

- Generally, allowable.
- To be considered a “conference,” must disseminate technical information beyond the recipient or subrecipient and be necessary and reasonable for successful performance under the Federal award
- Allowable conference costs include rental of facilities, costs of meals and refreshments, transportation . . . unless restricted by the Federal award
- Costs related to identifying ~~*but not~~ and providing* locally available dependent-care resources ***for participants*** are allowable ***as needed.***
- Conference hosts must exercise discretion in ensuring costs are appropriate, necessary, and managed to minimize costs to Federal award

Training and education costs – 200.473

- Allowable

Travel - 200.475

- Travel costs may be charged on actual cost basis, a per diem or mileage basis or a combination of the two, provided the method used is applied to an entire trip and not selected days of the trip.
 - The method used must be consistent with state/local activities and established written policies.
- Travel charges must be consistent with entity's ***established*** written policies.
 - Must also document and justify that participation of an individual is necessary for the federal award and costs are reasonable and consistent with written policies.
- Allows costs for “above and beyond regular dependent care” if:
 - Costs are directly related to federal award travel;
 - Consistent with ***established written*** policy for all travel; and
 - Costs are temporary during travel period.

Participant Support Costs – 200.1

- Participant support costs are allowable.
 - *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 (200.1).*
- Who is a Participant?
 - *An individual participating in or attending program activities under a Federal award, such as trainings or conferences, but who is not responsible for implementation of the Federal award.*
 - DOES NOT INCLUDE: Individuals committing effort to develop or deliver the program including consultants, project personnel, or staff members.
 - Examples of participants: community members, students, or conference attendees.

Participant Support Costs – 200.456

- *The classification of items as participant support costs must be documented in the recipient's or subrecipient's written policies and procedures and treated consistently across all Federal awards.*
- General prior approval requirement removed (200.407)
- However, the transfer of funds budgeted for participant support costs to other budget categories requires a budget amendment (200.308)

Add to policies and procedures!

Prior Written Approval - 200.407

- § 200.306 Cost sharing;
- § 200.307 Program income;
- § 200.308 Revision of budget/ program plans;
- § 200.333 Fixed amount subawards;
- § 200.430 Compensation - personal services;
- § 200.431 Compensation - fringe benefits;
- § 200.440 Exchange Rates
- § 200.441 Fines, penalties, damages and other settlements;
- § 200.442 Fund raising and investment management costs;
- § 200.445 Goods or services for personal use;
- § 200.447 Insurance and indemnification;
- § 200.455 Organization costs;
- § 200.439 Equipment and other capital expenditures;
- § 200.458 Pre-award costs;
- § 200.462 Rearrangement and reconversion costs;
- § 200.475 Travel costs.

Removed: Real property, Equipment (200.313), Entertainment costs, Participant support costs, taxes.

Competition – 200.319 (cont.)

- New Contractor Preferences
 - Does not prohibit recipients or subrecipients from developing written procedures for procurement transactions that incorporate a scoring mechanism that rewards bidders that commit to specific numbers and types of U.S. jobs, minimum compensation, benefits, on-the-job-training for employees making work or products providing services on a contract, and other worker protections.
 - Any scoring mechanism must be consistent with the U.S. Constitution, applicable Federal statutes and regulations, and the terms and conditions of the Federal award.

Suspension And Debarment – 200.214; 180.300; 200.216

- For contracts over \$25,000, you must verify that the person with whom you intend to do business is not excluded or disqualified.
 - Prohibition on certain telecommunications and video surveillance services or equipment
 - ***Note for PTEs: Must Confirm in [SAM.gov](https://www.sam.gov) that a potential subrecipient is not suspended, debarred or excluded from receiving Federal funds (200.332(a))***
- This MUST be done by one of the following:
 - Checking [SAM.gov](https://www.sam.gov)
 - Collecting a certification from that person
 - Adding a clause or condition to the covered transaction with that person

Other Procurement Rules

- ***Prohibition on using geographic preferences removed!***
- 200.322 – Domestic Preference for Procurement
 - “To the greatest extent practicable” must provide a preference for the purchase of goods and materials produced in the U.S.
- 200.323 – Procurement of Recovered Materials
 - ***New (b) Should, to the greatest extent practicable and consistent with law, purchase, acquire, or use products and services that can be reused, refurbished, or recycled; contain recycled content, are biobased, or are energy and water efficient; and are sustainable.***

Property Thresholds



Equipment: tangible, non-expendable, personal property useful life of more than one year and cost of **\$10,000** or more per unit



Supply: All tangible personal property other than equipment



Computing Devices: If less than **\$10,000** per unit, defined as supplies

Inventory Procedures – 200.313(d) (cont.)

- Physical inventory at least every two years (or more often, if required by State or your own policies)
- Control system to prevent property loss, damage, theft
 - All incidents must be investigated ***and reported to the Federal agency or pass-through entity***
- ***Regular*** maintenance procedures ***in place***
- If authorized or required to sell property, proper sales procedures to ensure highest possible return

Equipment Disposition –200.313(e) and (f)

- When property is no longer needed in any current or previously Federally-funded supported activity, must request disposition instruction from the Federal agency **or pass-through entity.**
- (e) Disposition will be made as follows, in accordance with Federal agency **or pass-through entity** disposition instructions:
 - Fair market value more than **\$10,000 (per unit)** = pay Federal share back to federal agency **or pass-through entity**
 - May retain **\$1,000** to cover expenses associated with the selling and handling of the equipment.
 - Fair market value of **\$10,000 or less (per unit)** = no money owed back to feds
- **(f) Equipment retention. When included in the terms and conditions of the Federal award, the Federal agency may permit the recipient to retain equipment with no further obligation to the Federal Government unless prohibited by Federal statute or regulation.**

Supplies – 200.314

- Supplies are an allowable direct charge (200.453). Title to supplies acquired under the Federal award will vest upon acquisition in the recipient or subrecipient.
- If there is a residual inventory of unused supplies ***at the end of the period of performance*** exceeding ***\$10,000*** in total aggregate value, and the supplies are not needed for any other Federal award, the State or LEA may retain or sell the supplies.
 - ***Unused supplies means supplies that are in new condition, not having been used or opened before.***
 - ***The aggregate value of unused supplies consists of all supply types, not just like-item supplies.***

Supplies Disposition – 200.314 (cont.)

- *The federal agency or pass-through entity is entitled to compensation in an amount calculated by multiplying the percentage of the federal agency's or pass-through entity's contribution towards the cost of the original purchase(s) by the current market value or proceeds from the sale.*
- If the supplies are sold, the Federal agency PTE may permit the recipient or subrecipient to *retain \$1000* from the Federal share of the proceeds to cover expenses associated with the selling and handling of the supplies.

Methods of Collection, Transmission and Storage of Information – 200.336

- When practicable, ***the Federal agency or pass-through entity and the recipient or subrecipient must*** collect, transmit, and store Federal award information ***in an* open *file, non-licensed,*** and machine-readable formats.
- ***Recipient or subrecipient may substitute*** electronic versions of ***original paper records*** through duplication or other forms of electronic conversion, provided that ***the procedures*** are subject to quality control reviews.
 - Quality control reviews must ensure that ***electronic conversion procedures*** provide reasonable safeguards against alteration of records and assurance that records remain in a format readable ***by a computer system.***

Audit Requirements – 200.501

- Single audit required when an entity expends ***\$1,000,000*** or more in total Federal funding during a single fiscal year
 - Major Programs (200.518)
 - Auditors must report material weaknesses in internal controls or questioned costs greater than \$25,000 (200.516)
- Consider cooperative audit resolution – (200.1, 200.513)
- PTE must issue management decisions within six months of audit report (200.521)
- 2024 Compliance Supplement:
<https://www.fac.gov/assets/compliance/2024-Compliance-Supplement.pdf>



EO 14151 “Ending Radical And Wasteful Government DEI Programs And Preferencing”

- Terminates all Diversity, Equity, Inclusion, and Accessibility (DEIA) initiatives throughout federal government
- DEIA positions across the federal government placed on administrative leave
- In response, ED:
 - “Removed or archived hundreds of guidance documents, reports, and training materials that include mentions of DEI”
 - Dissolved DEI-related councils and training contracts
 - Withdrew Department’s equity plan

EO 14168 “Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government”

- Says “sex” is defined as only male and female and is an “immutable biological classification”
- Impacts sex-based discrimination laws, including Title IX
- Further cements January court decision striking down Biden admin Title IX regulations nationwide
- February 4, 2025
- ED issued guidance instructing recipients to implement 2020 rule, and “immediately reorient” any investigations that may have begun under the invalidated 2024 rule
- <https://www.ed.gov/media/document/title-ix-enforcement-directive-dcl-109477.pdf>

Upcoming Key Dates

Event	Due Date
Perkins V IC Local Application	Friday, May 30, 2025 within NOVA
Grant Year FY 2024-25 Ends	June 30, 2025
Perkins 2025-26 Title I-C grants become effective	July 1, 2025
FY 2024-25 Final Report (Fiscal and Narrative)	August 31, 2025

Q & A Session



Reference Materials



- [2025 Monitoring and Technical Assistance Manual: California Postsecondary Strengthening Career and Technical Education for the 21st Century Act \(Perkins V\) \(PDF\)](#)

Feedback Survey

Perkins Manual Webinar -
Feedback Survey



[https://forms.office.com/
r/pEP3HNqAVL](https://forms.office.com/r/pEP3HNqAVL)



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Thank you!

If you have additional questions or need technical support
reach out us at
PerkinsSupport@CCCCO.edu

www.cccco.edu