

Investing in Quality: Funding the Perkins V Comprehensive Local Needs Assessment

One of the most significant changes introduced in the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) is the new comprehensive local needs assessment (CLNA). Specifically, the law states: *“To be eligible to receive financial assistance under this part, an eligible recipient shall— (A) conduct a comprehensive local needs assessment related to career and technical education and include the results of the needs assessment in the local application submitted under subsection (a); and (B) not less than once every 2 years, update such comprehensive local needs assessment.”*

The purpose of the CLNA is to support data-driven decisionmaking and more closely align planning, spending and accountability activities under Perkins V. The results of the local needs assessment must form the foundation of the local application, and drive local spending decisions.

Yet, for the CLNA to reach its full potential, states and local will need to commit significant resources and expertise. Without such an investment, the risk for the CLNA to simply be an exercise in compliance is too great. As states are building out the processes, guidance and supports for local eligible recipients, they should consider the full range of federal and state funding sources available to them to put on the table.

Perkins Funding to Support CLNA

States can use all three of their Perkins funding streams to fund parts of the CLNA process, including leadership funds, administration funds and reserve funds. By using some or all of these funding levers strategically, states can help to ensure that local recipients have the supports they need to be successful at the CLNA process. States can also provide guidance around how locals can use their own Perkins allocations to implement the CLNA.

State Leadership Funds

The ten percent of funds that states may reserve for state leadership activities are perhaps the most flexible resources available at the state level for supporting CLNA implementation. “Technical assistance for eligible recipients” is a required use of leadership funds, and many of the permissive uses, such as “supporting eligible recipients in eliminating inequities in student access” relate directly to components of the CLNA.

This flexibility has encouraged many states to set aside a portion of their leadership dollars specifically to help local recipients develop and implement the CLNA process. Such activities may include state trainings or technical assistance in the form of toolkits,

Funding Sources to Consider

- ✓ Perkins State Leadership Funds
- ✓ Perkins Administration Funds
- ✓ Perkins Reserve Funds
- ✓ Local Perkins Funds
- ✓ WIOA State and Local Funds
- ✓ ESSA Title I or Title II Funds
- ✓ Other State or Private Funds

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webinars or presentations; hands-on workshops or facilitated convenings hosted by state staff; or direct financial assistance to locals to participate in CLNA events. For example, **Kansas** is using state leadership dollars to provide supplemental funds to each local recipient to offset travel costs for Perkins coordinators to attend regional convenings around development of the CLNA.

State Administration Funds

As in prior versions of Perkins, states may reserve up to five percent or \$250,000, whichever is greater, for administration of the state plan. These funds may be used for developing the state plan, reviewing local applications, monitoring and evaluating program effectiveness, assuring compliance with all applicable federal laws, providing technical assistance and supporting and developing state data systems. Several CLNA-related activities fit under these allowable uses of administration funds. For example, because the CLNA guidance or templates must be included in the state plan, these development activities could be considered administrative expenses. Enhancing state data systems and providing technical assistance may also be used to support the CLNA. In **Colorado**, Perkins administration funds will help support an overhaul of the CTE data system, which in turn will be used to provide more customized and accessible data to local recipients to use for their CLNAs.

Reserve Funds

Under Perkins V, states can now “reserve” up to 15 percent of their local funding to support local recipients in fostering innovation or developing, implementing or adopting programs of study or career pathways that align with high-skill, high-wage or in-demand occupations or industries. The reserve fund could be an important source of funding for activities related to the CLNA, particularly in states that are pursuing a regional approach to the CLNA that also seeks to build stronger programs of study.

Under Perkins V, **Louisiana** is moving to a consortia model in which eight regions of the state will each work collaboratively across secondary and postsecondary entities to complete the CLNA and local application, as well as to strengthen regional programs of study. Each regional lead will be eligible to apply for a reserve fund grant. These grants, which will range from \$100,000 to \$200,000, will help cover salaries of leadership staff and support activities such as travel and stipends for joint work, professional development and participation in state trainings. The goal is to ease the burden on institutions taking on more responsibility for regional leadership.

Local Perkins Funds

At the local level, Perkins V allows eligible recipients to use their Perkins allocations to support program evaluation work, specifically referencing the needs assessment process in Section 135(b)(6) under “Requirements for Uses of Funds.” Like at the state level, the five percent administrative costs set-aside can

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also be used for administrative activities related to the CLNA, but due to the specific uses of funds language, locals are not limited to this cap for their evaluation activities under the federal law.

While states have the ultimate authority on specific allowable activities and caps on areas of local spending, some states, such as **Kentucky**, are encouraging their local recipients to include activities to support the CLNA in their 2019-20 local grant applications. States may also encourage locals to build in costs for traveling to regional convenings or trainings around the CLNA or to hire third-party evaluators or facilitators to assist with program review. In **New York**, local recipients are required to fund a project during the transition year to begin evaluating CTE programs as a foundation of the CLNA, which may include stipends for teachers' time or bringing in consultants with specific areas of expertise.

Other Funding to Support CLNA

Workforce Innovation and Opportunity Act: States that are collaborating with their workforce systems for regional CTE and workforce development planning, particularly states that are submitting a combined plan for Perkins and the Workforce Innovation and Opportunity Act (WIOA), may be able to use statewide reserve funds for regional planning activities such as the CLNA. Local workforce boards may also have resources related to identifying labor market needs or other components of the CLNA.

Every Student Succeeds Act: States that are aligning the CLNA with components of the needs assessment(s) required under Title I or Title II of the Every Student Succeeds Act (ESSA) may be able to braid funding, technical assistance or other state supports across Perkins and ESSA.

Other State or Private Funds: States with their own CTE funding can certainly redirect dollars to build capacity within eligible recipients to conduct the CLNA, or at the state level to provide facilitation supports. States can also look to foundations or other sources of external funding to support such efforts.

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