# Rhode Island Career & Technical Education

Rhode Island Department of Education

# Perkins Sub-Recipient Monitoring Guide

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# Perkins V Compliance Overview & Guidance

## General Overview

The Rhode Island Department of Education is required to monitor local sub-recipients to assure compliance with fiscal and management requirements of the Strengthening Career and Technical Education for the 21st Century Act (Perkins V), federal, and state legislation. Rhode Island's CTE monitoring process will provide an opportunity to assess compliance, operations, and Perkins V student performance metrics while identifying challenges facing local sub-recipients. The monitoring process is designed to ensure compliance and provide valuable support and insights with the goal of improving programs across the state.

This document is designed to serve as an overview of procedures outlining RIDE's CTE monitoring and review process for sub-recipients.

## Goals of the Review Process

*Goal 1*: Fulfill RIDE's obligation to the U.S. Department of Education to ensure school divisions are meeting the requirements of Perkins V.

*Goal 2*: Assess school division's compliance with state and federal laws, regulations, standards, and student performance metrics.

*Goal 3*: Potentially identify needs and develop support designed for school compliance with state and federal laws, regulations, and standards.

## Program Monitoring Components

Rhode Island's CTE monitoring timeframe is a 3-step process consisting of the following steps. The process for identifying on-site reviews will be explained on page 4:

| Item | Detail | Timeline |
|---|---|---|
| **CTE Annual Program Inventory** | **ALL Sub-Recipients** – Annual inventory of all programs, staff, curriculum, and work-based learning activities for each program | Fall |
| **CTE Program Desk Review*** | **Selected Sub-Recipients** - This process will take a deeper look at program details including enrollment (school-wide and CTE), financial records (purchase orders, expenditure reports, equipment inventory), financial operations, protocols, and policy, program documentation (safety inspection records, program accreditation records, work-based learning documentation), staff development records, program materials (recruitment, promotion, application, course selection registration), and career and technical student organization affiliation records. | Winter/Spring |
| **CTE Program Monitoring Visit & On-Site Review** | **Selected Sub-Recipients** - Interview sub-recipient CTE administration, building principals, CTE teaching staff, school counselors, and CTE students; and, perform walkthrough of CTE programs. | Winter/Spring |

## Identifying Programs for Desk Review & Monitoring Visits

Per the CTE Annual Program Inventory, the Perkins Consolidated Annual Report (CAR), and other related CTE state-wide data measures, the RIDE team will assess all sub-recipients using a set of indicators to determine programmatic risk. This review will include as needed participation in both a desk review and an on-site review process.

***Desk Review Process***: A selection of sub-recipients identified annually based on outcome criteria listed below:

| Indicators | Point Values |
|---|---|
| The number of RIDE-Approved CTE programs offered by the sub-recipient. | +**.25 points** assigned for each CTE course in the school division |
| The amount of the annual Perkins allocation. | +0 (under $50,000)<br>+5 (between $50.001 - $100,000)<br>+10 (between $100,001 - $150,000)<br>+15 (above $150,001) |
| The number of secondary CTE programs under/over representation in either sex (over 75% or under 25%). | **+3 points** assigned to each program in the division that is unrepresentative by sex |
| The fiscal protocol and policy risk of CTE sub-recipients. | **+10 points** assigned for sub-recipients identified by RIDE's Finance Team as at-risk for compliance of federal and state funds |
| The timeliness of submission of all required CTE Perkins budgets and data submissions. | **+5 points** assigned for every budget and/or report not initially submitted on time |
| The number of years since the LEA has been monitored while being a recipient of Perkins funds.. | **Points:**<br>**+0** (5 years or less)<br>+**10** (6 to 10 years)<br>**+20** (11 to 15 years)<br>**+30** (15+ years) |
| The percent of concentrators that become completers in the LEA's RIDE-approved CTE programs. Only those CTE programs that have been in operation for at least five years will be included in this calculation. | **+0 (above 40% average of all programs)**<br>**+5 (30-39% average of all programs)**<br>**+10 (20-29% average of all programs)**<br>**+15 (below 20% average of all programs)** |
| Any additional criteria as determined by RIDE | **To be determined by RIDE** |

***On-Site Review Process***: Following the desk review process, RIDE will review all data and performance from the Perkins V state plan to identify those sub-recipients selected for an on-site review.

## On-Site Reviews

The on-site reviews will be conducted by a team from RIDE consisting of members of the CTE Team, Finance Team, and the Office of College and Career Readiness. The review team will be on-site for 1-2 days at each school and will arrange with CTE directors for all necessary preparation. The following outlines what to expect from the on-site review team process.

***Step 1: Preliminary Preparation & Document Review:***
Prior to the on-site visit, the team will collaborate with the sub-recipient to schedule the review and share essential information. The RIDE team will work closely to establish an agenda and clarify expectations, ensuring a smooth and purposeful on-site experience.

During an on-site review, RIDE requests that the following representatives from the sub-recipient team make themselves available for interview:

| Secondary On-Site Reviews | Postsecondary On-Site Reviews |
|---|---|
| CTE Director / Coordinator | CTE Director / Coordinator |
| School Building Principal(s) | College President or designee |
| Representative(s) from Finance Team | Representative(s) from Finance Team |
| Representative(s) from Superintendent’s Office | Department Chair Representative(s) |
| Other identified district representatives | Instructor(s) |
| School Counselor(s) | Academic advisor(s) and/or dean(s) |

RIDE staff will request to meet with groups of students to confirm their CTE experiences related to access and admissions, student supports, work-based learning, overall scheduling, and attainment of completer status.

***Step 2: Arrival and Introduction:***
On the scheduled day, the RIDE team will arrive at the school, ready to engage with administrators, educators, and students. The RIDE team will begin with introductions and an overview of the on-site review process, fostering an atmosphere of collaboration and shared commitment to CTE excellence.

***Step 3: Stakeholder Engagement:***
The RIDE team will conduct interviews with key stakeholders, including program administrators, teachers, students, and industry partners. These conversations provide valuable insights into the strengths and unique qualities of the school’s CTE program.

***Step 4: Program & Classroom Observations:***
The RIDE team will observe CTE classrooms and program-specific spaces to document facilities and observe program activities. This step allows us to account for an inventory of Perkins-related purchases and to confirm that the program is being taught to meet the goals of the approved industry standard. This time will be used to evaluate if the program is investing Perkins the goals as outlined in the Comprehensive Local Needs Assessment (CLNA).

This time will be used to observe student engagement and the demonstration and integration of academic and technical skills.  RIDE may provide actionable feedback to CTE teachers as applicable.

***Step 5: Exit Interview:***

Before concluding the on-site visit, the RIDE team will conduct an exit interview to share preliminary observations, commendations, and any areas for improvement. This transparent communication fosters collaboration and sets the stage for ongoing program enhancement.

## Post Review Process

Post-monitoring, RIDE will provide feedback to program directors. This feedback is intended to recognize commendable practices, highlight areas of success, and offer constructive recommendations for improvement. Through this feedback process, RIDE aims to facilitate an environment where CTE programs continually evolve to meet the dynamic needs of students, industries, and the broader community.

Within 45 calendar days following the review, RIDE will provide a written feedback report, containing any findings, recommendations, and commendations. This report and corresponding rubric will cover the following areas:

1. CTE Financial Policy
2. CTE Management Systems
3. CTE Advisory Committee
4. Career and Technical Student Organizations
5. Work-Based Learning
6. Equipment

The Rhode Island CTE Monitoring Process stands as a cornerstone for ensuring the vitality and impact of CTE programs statewide. By combining rigorous desk reviews, insightful on-site visits, and collaborative feedback mechanisms, Rhode Island strives to cultivate a robust CTE landscape that equitably prepares students for success in both college and career pathways. This commitment to monitoring, Perkins compliance, and continuous improvement reflects Rhode Island's dedication to providing high-quality CTE experiences that empower students for the demands of the 21st-century workforce.

## Rhode Island Perkins V Compliance and Monitoring Desk Review

The following document outlines questions and materials to be reviewed as part of the Desk Review phase of the Perkins review. Complete each field labeled for sub-recipient (i.e. Perkins-eligible LEA) response included in this document.

Sub-recipients are requested to submit evidence as needed throughout responses, and any required information will be notated in the "sub-recipient provides" column. Any required attachments should be linked as Google documents, or attached documents that are referenced in your sub-recipient response. Districts shall provide narrative as to how funds in each category are used to support the goals of the district's Comprehensive Local Needs Assessment (CLNA).

| Section 1: Perkins Financial Components | | | |
|---|---|---|---|
| **UCOA Code** | **Requirement** | ***Sub-Recipient Submission Evidence/Materials May Consist of the Following:** | **Sub-Recipient Response**<br>Provide narrative & supporting evidence for each requirement |
| 51000 | Personnel Services - Compensation | Staffing budgets to ensure that salaries are moved from Perkins to local budget | |
| 52000 | Personnel Services – Employee Benefits | N/A as this is a function of 51000. Staffing budgets to ensure that benefits are moved from Perkins to local budget | |
| 53000 | Purchased Professional & Technical Services | Contracts and/or invoices for any purchased technical services | |
| 54000 | Purchased Property Services | Contracts and/or invoices for any purchased property services | |
| 55000 | Other Purchased Services | Will be identified by RIDE fiscal prior to desk review process | |
| 56000 | Supplies & Materials | N/A as RIDE may review previously submitted supply lists as validation of purchase | |
| 57000 | Property & Equipment | N/A as RIDE will review previously submitted Inventory Control Form and Acquisition / Disposition Form | |
| 58000 | Miscellaneous | Will be identified by RIDE fiscal prior to desk review process | |

In addition to the listed financial requirements as noted above, RIDE may complete an internal review of the following financial documents, which have been provided to RIDE through previous district submissions:

- Program budgets as submitted through Accelegrants
- Current and/or past CLNA submissions
- Any additional documents as identified by RIDE staff

****Prior to any desk review, RIDE will schedule time in advance with each sub-recipient to elaborate on any required submissions for each of the above Perkins fiscal categories.***

## Section 2: Use of Perkins Funds

**Sub-Recipient Self-Evaluation & Supporting Evidence**
For each listed Perkins criterion, identify your LEA's current status towards meeting each criterion, either "full compliance" or "not yet compliant." After completing each evaluation, provide a response as needed:

- ***Full compliance*** – Provide evidence and a narrative demonstrating how this requirement has been completed. Please be aware that RIDE will validate documentation during the desk audit. Additionally, should RIDE believe there is any discrepancy, RIDE reserves the right to conduct an onsite visit.
- ***Not yet compliant*** – Provide a narrative describing how Perkins funds will be used to achieve full compliance in this requirement.

| | | | |
|---|---|---|---|
| **Criterion 1:**<br>Activities were provided that prepare special populations for high-skill, high-wage, or in-demand occupations that will lead to self-sufficiency. [Perkins Section 134(b)(5)(A)] | Self-Evaluation (choose one): | Full Compliance | Not yet compliant |
| | | | |
| **Criterion 2:**<br>Funds were used to promote preparation for nontraditional training and employment. [Perkins Section 134(b)(5)(B)] | Self-Evaluation (choose one): | Full Compliance | Not yet compliant |
| | | | |

| | | | |
|---|---|---|---|
| **Criterion 3:**<br>Activities were conducted to improve the recruitment and retention of CTE teachers, faculty, and counselors including individuals in groups underrepresented in the teaching profession, and the transition to teaching from business and industry. [Perkins Section 134(b)(8)] | Self-Evaluation (choose one): | Full Compliance | Not yet compliant |
| | | | |
| **Criterion 4:**<br>Comprehensive professional development (including initial teacher preparation) for career and technical education, academic, guidance, and administrative personnel are provided that promote the integration of coherent and rigorous content aligned with challenging academic standards and relevant Career and Technical Education. [Perkins Section 135(b)(2)] | Self-Evaluation (choose one): | Full Compliance | Not yet compliant |
| | | | |
| **Criterion 5:**<br>Activities are conducted to develop, improve, or expand the use of technology in career and technical education. [Perkins Section 135(b)(5)(D)]. | Self-Evaluation (choose one): | Full Compliance | Not yet compliant |
| | | | |

| | | | |
|---|---|---|---|
| **Criterion 6:**<br>Career and technical education programs are being initiated, improved, expanded, and modernized.  [Perkins Section 135(b)(5)(D)] | Self-Evaluation (choose one): | Full Compliance | Not yet compliant |
| | | | |
| **Criterion 7:**<br>Activities are being provided to link secondary and postsecondary career and technical education.  [Perkins Section 135(b)(5)(A)(C)] | Self-Evaluation (choose one): | Full Compliance | Not yet compliant |
| | | | |
| **Criterion 8:**<br>Career guidance and academic counseling were provided to CTE students including linkages to future education and training opportunities.  [Perkins Section 135(b)(1)(D)] | Self-Evaluation (choose one): | Full Compliance | Not yet compliant |
| | | | |

## Section 3: CTE Program Management & Document Review

In addition to all completed narratives and submitted documents, as a part of the desk audit, RIDE will review public documents and materials as a part of the sub-recipient's desk review. These items will include, but are not limited to:

| | |
|---|---|
| RIDE will review the following documents as a part of the desk review process | - Program website and publicly posted materials<br>- District Comprehensive Local Needs Assessment (CLNA)<br>- Program handbook and student policies<br>- Other information, as required |

## Post-Desk Review Next Steps

Any eligible sub-recipient, whether deemed in compliance or not, may receive a program monitoring visit and on-site review after completion of the Desk Review process. If selected for a program monitoring visit and on-site review, RIDE may ask the sub-recipient to provide additional information and clarification .

When selected for an on-site review, RIDE will schedule a meeting with the sub-recipient team to preview the program monitoring visit and provide a list of items required during the on-site review and as described in the .