



Mike DeWine, Governor
Dr. Stephanie K. Siddens, Interim Superintendent of Public Instruction

MEMORANDUM

To: Career Technical Education Superintendents, Treasurers and Program Directors

Fr: Jonathan Beard, Assistant Director

Dt: October 28, 2022

Re: Allowability of Initial Teacher Licensing Expenses under Perkins V

The Office of Career-Technical Education (CTE) in partnership with the Ohio Department of Higher Education's (ODHE) Workforce Alignment team recognizes the crisis of teacher shortages in the education community as a whole, and particularly in CTE. This guidance seeks to clarify the allowability of Perkins V grant funds for initial teacher licensure and provide districts with options and flexibility in the use of Perkins federal funds for teacher licensure.

Background

There has been uncertainty about the use of Perkins V local allocations to reimburse employees for the expense of their initial licensing as a CTE teacher. While Perkins IV¹ expressly allowed this, the Perkins V list of requirements for the uses of funds is vague and does not directly address the expense of teacher preparation.

As such, Ohio asked the US Department of Education (USDOE) for guidance, and the USDOE relayed that expenses related to teacher licensure are allowable under the general statement of [Sec. 135\(b\)\(5\)\(T\)](#) which permits "other activities to improve career and technical education programs."

The USDOE further clarified that Perkins funds can be used *only* if no nonfederal funding source had been used for that purpose in the prior year (i.e., supplanting). Therefore if nonfederal funds have been used to pay for teacher licensing in the previous year, then the use of Perkins dollars would not be allowable in the following year as it would constitute supplanting. Funding under the Perkins Act must supplement (increase the level of service) and not supplant (take the place of) state and local funds.

Any district/institution providing reimbursement of teacher licensing expenses must have a policy on file limiting those expenses necessary for licensure only, which also may include a standard for satisfactory completion of such coursework to be eligible for reimbursement. The Office of CTE and ODHE will not consider an expense

¹ Perkins IV, Sec 135(c)(8) says CTE funds may be used "for teacher preparation programs ... that assist individuals who are interested in becoming career and technical education teachers and faculty, including individuals with experience in business and industry."



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associated with non-aligned education or failed coursework that does not lead to licensure to be allowable expenses.

Process through the Comprehensive Local Needs Assessment and Local Application Systems

The following describes the process by which a district can provide for such funding using Perkins dollars.

Comprehensive Local Needs Assessment

Perkins law requires that expenditures be based on identified needs. Thus, to spend Perkins funds on teacher licensure, the Comprehensive Local Needs Assessment (CLNA) must identify teacher licensure as a need. The CLNA *must* be updated biannually and *can* be amended at any time between updates. If teacher licensure is not currently identified in the CLNA and a district/institution wishes to fund it, the CLNA will first need to be amended.

Most districts/institutions will likely identify the need to fund teacher licensure in the **Recruitment, Retention and Training of CTE Educators** section of the CLNA system, and more specifically within the “Recruitment of CTE Educators” or the “Educator Demographics” Question Group(s). The CLNA should contain information about the need to recruit new teachers in relation to the geographic area, career field and/or in-demand occupation. The Root Cause analysis for such amended Question Group must describe teacher licensure expense as a barrier to recruitment or diversity efforts.

When such Question Group identifying teacher licensing expense as being a local need is marked as a priority question group, it will populate the Pre-Planning Tab of the Perkins Local Needs Assessment system, where it can then be sent to the Planning Tool (Perkins Local Application in ED STEPS system) to be funded.

Please note that the CLNA requires stakeholder input and/or review, and the Office recommends that amendments to the CLNA be shared to give stakeholders opportunity for input. Notice to stakeholders and minutes should be maintained for monitoring purposes.

Local Application

In addition to its presence in the needs assessment, the Local Application must anticipate and reflect such initial teacher licensure expenditures. A Root Cause Analysis sent to the Planning Tool from the Perkins Local Needs Assessment system will populate in ED STEPS, and an appropriate goal must be constructed. Under that goal, select the strategy listed as “5(T) Other Activities to Improve Career and Technical Education Programs” and build out appropriate action steps and budget as needed.



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Additional Guidance to Manage Supplanting

The following guidance is provided to create a pathway back to Perkins funds for those districts that may have transitioned away from using Perkins V funds for initial teacher licensure, which creates issues with the prohibition against supplanting local funds found in the Perkins statute.

The Office of CTE is not promoting the use of Perkins funds for the purpose of initial teacher licensure. This is a local decision that should account for the resources available, competing interests and the reduced amount of Perkins funds available for other identified priorities. The Office does want to provide a pathway to the use of Perkins funds should that be deemed a local priority.

According to the USDOE and the Office of Federal Programs, the Elementary and Secondary School Emergency Relief (ESSER), Governors' Education Emergency Relief (GEER) and American Rescue Plan (ARP) funds can be used to support the costs of initial teacher licensure. Further, those recovery funds are not subject to the "supplement, not supplant" language found in Perkins V.

As such, for those districts/institutions that are now using **nonfederal** funds to pay the costs of initial teacher licensure, if the district seeks to provide future flexibility in the use of Perkins funds for that purpose, the Office of CTE provides the following information:

- Federal relief funds can be used in FY23 to pay the costs of initial teacher licensing. Such funds do not create supplanting issues even if they are replacing local funds spent in FY22.
- So long as no state or local funds are used for that purpose in FY23, Perkins funds may be used in FY24 to pay costs of initial teacher licensure. The use of Perkins funds after ESSER, ARP and/or GEER funds does not create a supplanting issue.

If you have further questions about this provision, please contact the Career-Technical Planning District's assigned Administrative Field Services unit consultant or the ODHE Perkins administrator.

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