Department Of Labor and Economic Opportunity-
Workforce Development (LEO-WD)
Perkins Postsecondary

Compliance Review Checklist
(Postsecondary Institution)

Program Year Reviewed: _____

Institution: _____

Date: _____

The following review items are pursuant to the requirements of the Strengthening Career and Technical Education for the 21st Century Act, Public Law 115-224 (Perkins V). Perkins V, Uniform Grant Guidance (UGG), the Perkins V Michigan State Plan, and LEO-WD Department Policy requires monitoring activities as necessary to ensure program effectiveness and the funds are used for authorized purposes.

Institution staff should provide evidence(s) believed to meet each requirement as outlined and/or suggested in each section below. Please direct all correspondence and materials to Perkins Postsecondary at LEO-MiCC@michigan.gov, attention Neco Jackson, per the provided deadline. Upon completion of the review, LEO-WD will provide a summary of topics reviewed and, if applicable, identify findings, corrective actions, administrative recommendations, and communicate best practices.

I. REVIEW AREA: INSTITUTIONAL POLICY

LOBBYING POLICY

No federal appropriated funds have been paid or will be paid by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the making of any federal grant, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any federal grant or cooperative agreement. If any funds other than federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member Of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this federal grant, the applicant shall complete and submit Standard Form SF–LLL Disclosure Form to Report Lobbying, in accordance with its instructions.

Evidence:

Provide the following:

☐ Governing board policy/procedures manual (adopted policy statement)

☐ Governing board meeting minutes recording the adoption of policy

☐ Other (including additional narrative or notes)

Results: ☐ No action required ☐ Action required

Comments (Optional):

NON-SUPPLANTING POLICY

Evidence:

Provide the following:

Federal funds received under the Act will be used to supplement and increase (to the extent reasonable) the amount of state and local funds that would, in the absence of such federal funds, be made available for the use specified in the Act, and in no case supplant state or local funds.

☐ Governing board policy/procedures manual (adopted policy statement)

☐ Governing board meeting minutes recording the adoption of policy

☐ Other (including additional narrative or notes)

Results: ☐ No action required ☐ Action required

Comments (Optional):

II. REVIEW AREA: EQUITY ASSURANCES

NON-DISCRIMINATION POLICY

The institution demonstrates governing board adoption of either separate or comprehensive policies that no persons shall be discriminated against on the basis of race, color, religion, national origin or ancestry, age, sex, disability, or marital status or be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination in any program or activity for which the institution is responsible or for which it receives federal financial assistance from the Department.

Evidence:

☐ Michigan Civil Rights Compliance Review (CRCR) Summary Report, and CRCR Compliance Plan (if applicable), from compliance year of review (or one year prior). No documentation required, unless specifically requested by Perkins Postsecondary.

Or select and provide the following:

☐ Governing board policy/procedures manual (adopted policy statement)

☐ Governing board meeting minutes recording the adoption of policy

☐ Grievance procedures

☐ Excepts/examples of policy use (e.g. grievance procedures, institution catalog, student handbook, printed brochures, program applications and prerequisites)

☐ Other (including additional narrative or notes)

Results: ☐ No action required ☐ Action required

Comments (Optional):

CIVIL RIGHTS COMPLIANCE POLICY ADOPTION

The institution demonstrates governing board adoption of either separate or comprehensive policies addressing the requirements of the following acts:

A. TITLE VI OF THE CIVIL RIGHTS ACT OF 1964, §100.6(D)

No person in the U.S. shall, on the grounds of race, color or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program to which this part applies.

B. TITLE IX OF THE EDUCATION AMENDMENTS OF 1972, §106.1

Title IX is designed to eliminate discrimination on the basis of sex in any education program or activity receiving federal financial assistance (FFA).

C. SECTION 504 OF THE REHABILITATION ACT OF 1973, §104

No qualified person with a disability shall, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity which receives FFA.

D. TITLE II (AMERICAN'S WITH DISABILITIES ACT) - SUBPART B, §35.130(A)

No qualified individual with a disability shall, on the basis of disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any public entity.

Evidence:

☐ Michigan Civil Rights Compliance Review (CRCR) Summary Report, and CRCR Compliance Plan (if applicable), from compliance year of review (or one year prior). No documentation required, unless specifically requested by Perkins Postsecondary.

Or provide the following:

☐ Governing board approved policy/procedures (individual or comprehensive)

Title VI: Policies must include color, race, and national origin
Title IX: Policies must include gender
Section 504: Policies must include disabilities
Title II: Recommended, but not required (ADA-Disability)

☐ Governing board meeting minutes recording the adoption of policy

☐ Other (including additional narrative or notes)

Results: ☐ No action required ☐ Action required

Comments (Optional):

III. REVIEW AREA: PROGRAM ADMINISTRATION

The institution will provide compliance evidence pertaining to Perkins administration and oversight.

Evidence:

☐ As described in section Sec. 135(b) of Perkins V, each of the following six requirements for uses of funds has been addressed within the program year, whether it be supported by federal, state, local, or a combination of funding sources. Provide evidence supporting institutional activities related to the following.

- Career exploration and career development activities
- Professional development
- Skills necessary to pursue careers in high-skill, high-wage, or in-demand industry sectors
- Integration of academic skills
- Increasing local levels of performance
- Develop and implement evaluations

☐ Documentation supporting sufficient size, scope and quality, as defined in the *Perkins Postsecondary Program Manual,* which may be evidenced through enrollment, program approval, linkages with secondary, credentials completed, articulation, USDOL Registered Apprenticeship program agreement, sequence of courses, course rotation, offerings, and explanation of implementation.

☐ Describe the process used to ensure credentials offered add value to occupational programs of study. The response may address:

- How decisions are made regarding the inclusion of third-party credentials
- Credentials available to students and their relevance to industry needs
- The decision-making framework for evaluating and selecting credentials
- Strategies for incorporation, including:
- Engagement of industry partners, employers, educators, and other key stakeholders in the decision-making process
- Use of labor market intelligence (e.g., occupational demand, wage data) to validate credential value
- Consideration of learner outcomes, such as employability, advancement opportunities, and skill attainment

☐ Describe advisory committee structure and engagement, including representation, attendance, meeting frequency, and alignment with local education agencies. The response may also address:

- Connections to external committees and councils
- The role of advisory committees in curriculum development
- Policies and processes that guide committee operations and decision-making

☐ Organization chart highlighting structure of local Perkins administration and oversight.

☐ Other (including additional narrative or notes)

Results: ☐ No action required ☐ Action required

Comments (Optional):

IV. REVIEW AREA: PERSONNEL QUALIFICATIONS

FACULTY WORK EXPERIENCE AND LICENSURE

Occupational course instructors shall have a minimum of two years of related work experience in the specific occupational area or in a directly related career field. When a license is required in a specialized field, it must be obtained prior to employment and remain current during the period of employment.

Evidence:

☐ A list of full and part time instructors.

☐ Sampling of three or more individuals' personnel files from various occupational programs **(selected by Perkins Postsecondary prior to the review)** to include:

- Application for employment,
- Copy of valid Michigan professional license (if applicable, excluding driver's license), and
- Job resume or curriculum vitae.

☐ Three or more recent position postings.

☐ Policy/procedure related to candidate selection and hiring requirements.

☐ Other (including additional narrative or notes)

Results: ☐ No action required ☐ Action required

Comments (Optional):

V. REVIEW AREA: STUDENT SUPPORT SERVICES

SPECIAL POPULATIONS – STUDENTS

The project activities are directed toward students who are formally enrolled in a State-approved occupational program of study during the reporting year, as identified by CIP code, or have formally declared an intent or commitment to enroll in a State-approved occupational program of study, and through a formal assessment has been determined to be in one or more special populations categories and received at least one supportive service within the reporting period.

Evidence:

☐ Summary of the process for identifying, engaging, and supporting existing and potential special population students. The response should include:

- Methods used to identify students within special populations
- Approaches for consultation and communication with students
- Follow-up strategies to ensure ongoing support and success
- How students are counted so they may be reported appropriately
- Systematic process for record keeping
- Explanation of any collaboration with secondary partners.

☐ Written policies and procedures.

☐ A full list of special population students.

☐ Sampling of three or more students' redacted personnel files, **selected by Perkins Postsecondary prior to the review**. This includes their educational path, assessment, unique needs, barriers, interests, abilities, work experiences, services, and an overall plan for helping them achieve their education and employment goals.

☐ Examples of available student support services and/or resources.

☐ Examples of outreach and promotional materials provided to attract special population students to State-approved program of study and to raise awareness of services available.

☐ Other (including additional narrative or notes)

Results: ☐ No action required ☐ Action required

Comments (Optional):

SPECIAL POPULATIONS – COST OF ATTENDANCE

Review of financial records, student files, attendance cost policy and procedure, and other practices for all special populations categories to assure equal treatment and support for those with greatest need.

Evidence:

☐ Support is identified as a priority within the CLNA, and cost is built into the Local Application.

☐ Policy and procedural documentation determining students with greatest need and allocating funds accordingly. This may include a combination of factors such as financial need, academic need, barriers to participation, institutional priorities and commitment to promoting access and success for all learners.

☐ Sampling of student redacted files to include the following:

- Records that identify students are enrolled in State-approved occupational program of study
- Support services and/or resources provided
- Supplemental material pertaining to services provided (e.g., child and dependent care tracking logs, transportation services, mileage reports, attendance records)
- Receipts for reimbursed expenses

☐ Other (including additional narrative or notes)

Results: ☐ No action required ☐ Action required

Comments (Optional):

VI. REVIEW AREA: FUND ACCOUNTING

A review of established institutional policies and procedures outlining appropriate internal controls aligned with Generally Accepted Accounting Principles (GAAP) and applicable federal and state regulations. Institutions will also provide evidence supporting reported expenditures and purchases.

Evidence:

☐ Explanation of the institution's budgetary process, handling restricted funds, personnel responsible for tracking and authorizing Perkins expenditures, and interlinkages with the CTE Administrator.

☐ Internal chart of accounts and explanation of account numbering convention to assess accurate categorization of expenditures into the Perkins identified Function Codes and Object Codes.

☐ Expenditure reports, along with a sample of receipts and/or invoices linked to local uses of funds.

☐ Expenditure reports, along with a sample of receipts and/or invoices linked to funding priorities identified in the CLNA.

☐ Local Leadership expenditure receipts.

☐ Evidence(s) of time and effort.

- Financial internal controls (policies/procedures) which provide reasonable assurance charges are accurate, allowable and allocable.
- Time sheets or other evidence of record keeping for split-funded positions.

☐ Other (including additional narrative or notes)

Results: ☐ No action required ☐ Action required

Comments (Optional):

VII. REVIEW AREA: LABS, EQUIPMENT, AND INVENTORY

Monitoring of labs and equipment will be done for the one year prior to the current year. Eligible equipment items will be properly tagged and inventoried by the institution. Notification of on-site visitation may be provided by LEO-WD as necessary for institutions with purchases made with Perkins funds exceeding $5,000.

Evidence:

☐ Outline institutional process for identifying, prioritizing, budgeting, procuring and installing allowable equipment for State-approved occupational programs of study.

☐ Close-up and wide-angle photos of equipment placement (including inventory sticker(s) clearly indicating the source of funding), and documented process of how equipment is tracked/inventoried. **Perkins Postsecondary will work with the institution to select pieces of equipment prior to submission.**

☐ **Full records of selected pieces of capital equipment under bullet two above (if applicable).** Evidence should include quotes from multiple vendors, dated purchase orders, delivery dates, paid invoice receipts, and warranty information.

☐ Written procurement policies, aligned with procurement competition rules (2 CFR 200.320), and in accordance with the bid letting policies and procedures established by the governing body of the institution.

☐ Other (including additional narrative or notes)

Results: ☐ No action required ☐ Action required

Comments (Optional):

VIII. REVIEW AREA: PROGRAM EVALUATION

State-approved occupational programs of study must be evaluated no less than once every five years. Upon completion of program evaluations, institutions must update the date of last evaluation in accordance with Program Inventory procedures.

Evidence:

☐ A list of all Program Review of Occupational Education (PROE), or State-approved alternate evaluations, completed within the program year under review. **A sample of three or more will then be selected by Perkins Postsecondary prior to the review.**

☐ Summary of institutional process for administering program evaluations including relevant staff, roles and responsibilities, timelines, and follow up in response to outcomes in order to affect necessary change.

☐ Other (including additional narrative or notes)

Results: ☐ No action required ☐ Action required

Comments (Optional):

IX. REVIEW AREA: LOCAL PERFORMANCE

In addition to providing documented evidence, provide explanation pertaining to the following

☐ Explain the institution's data collection methodology process; including how the data was reviewed for accuracy, reliability, and validity prior to submission. Discuss roles and accountability concerning data collection, interpretation, reporting standards and accountability within the institution.

☐ What training and documentation exist to ensure staff accountability and consistency in following reporting standards?

☐ How are reporting calendars, timelines, and extraction protocols maintained and monitored?

☐ What automated validation checks are in place to identify missing values, duplicate records, etc.?

☐ How are data discrepancies documented, tracked, and resolved?

☐ How are trends within data used to inform processes, staff training, and system controls?

☐ Explanation of the institutional exit survey process including average response rate, timing for sending surveys, follow up protocols for increasing response rates, and examples of other challenges and best practices.

☐ Other (including additional narrative or notes)

Results: ☐ No action required ☐ Action required

GENERAL COMMENTS/OBSERVATIONS: