

APPENDIX G

California Department of Education and Chancellor's Office, California Community Colleges

Request for Waiver of Section 132 Distribution Formula

California is requesting USDE approval to extend its waiver of the Perkins IV Section 132 distribution formula through the duration of the 2008-2012 state plan. The alternative formula complies with the "more equitable distribution of funds" waiver requirement established in Section 132(b)(1)&(2) of Perkins IV. Evidence of compliance is provided in Appendix L which demonstrates the comparative results of allocating the Section 132 funds by the Pell Grant/Bureau of Indian Affairs assistance formula prescribed in the Act and the alternative formula which is based on economically disadvantaged adult career technical education enrollment. Additionally, the alternative formula enables the state to recognize and serve economically disadvantaged adult CTE enrollment in over 140 programs conducted by adult schools and regional occupational centers (ROCPs), as well as those enrolled in community colleges.

The proposed alternative formula is unchanged from the formula initially approved for the Perkins II and III funds and extended for the 2007-2008 State Transition Plan. Specifically, the formula generates an unduplicated count of adults who are economically disadvantaged; in attendance at an adult school, ROCP, or community college; and enrolled in a career technical education program.

Economic disadvantage is determined by participation in one of the following public assistance programs, or evidence of personal or family income below the poverty level:

- Board of Governors Grant (BOGG)
- Pell Grant
- California Work Opportunity and Responsibility to Kids (CalWORKS)
- WIA (Workforce Investment Act)
- Supplementary Security Income (SSI)
- General Assistance
- Bureau of Indian Affairs (BIA)
- Adults eligible for economic public assistance or student fund aid and/or an annual income below the poverty line as defined by the county of eligibility
- Other economically disadvantaged individuals

The 2008-2009 Section 132 allocations will be based on an unduplicated count of the economically disadvantaged adults enrolled in CTE programs during the 2006-2007 program year which began on July 1, 2006, and ended on June 30, 2007. Similar data collection periods will be used for the 2009-2010, 2010-2011, 2011-2012, and 2012-2013 program year allocations. Third party verified data is preferred, but an eligible recipient may report those adults who have been identified by self-declaration as meeting at least one of the listed evidences of economic disadvantage. Reported enrollments will be validated by comparing this data with related data submitted by the eligible recipients for the same time period. Eligible recipients are required to maintain auditable records of student eligibility for five years.

Section 132 allocations are determined through the following process:

1. The California Department of Education (CDE) collects and validates the eligibility reports and data submitted by the adult school agencies and ROCPs. The Chancellor's Office of the California Community Colleges (CCCCO) collects and validates the eligibility data submitted by the community college districts;
2. The CDE determines the total number of economically disadvantaged adult CTE students by aggregating the validated economically disadvantaged enrollments reported by the adult school agencies, ROCPs, and community college districts;
3. The CDE computes a per student allocation amount by dividing the funding available for distribution under Section 132 by the total number of economically disadvantaged adult CTE students determined in #2;
4. The CDE determines each eligible recipient's (adult school agency, ROCP, and community college district) allocation by multiplying its validated number of economically disadvantaged adult enrollees by the per student allocation amount computed in item #3;
5. The CDE transfers to the CCCCCO, by interagency agreement, the total amount of the Section 132 funds to be awarded to community college districts; and
6. Both agencies, the CDE and CCCCCO distribute the funds for which they are responsible in accordance with the Section 132 guidelines.