

Unallowable/Ineligible Expenditures for RPPs

HF2392 set the requirements for use of RPP funds as:

- Convene, lead, and staff the regional career and technical education planning partnership;
- Offer regional career and technical education professional development opportunities;
- Coordinate and maintain a career guidance system pursuant to section 279.61; and
- Purchase equipment on behalf of school districts and community colleges participating in the regional career and technical education planning partnership.

HF648 added the following:

- To purchase standard classroom consumable supplies other than consumable supplies that will be made into products to be sold or used personally by students, teachers, and other persons.

Supplement and not supplant should be followed with RPP funds, but this is very case specific and it is difficult to provide a one size fits all guideline. The specific details of the situation need to be examined. The supplanting argument can be rebutted if the entity can demonstrate that it would not have provided the service in question with non-federal funds had the federal funds not been available. For example, state or federal funds are cut or eliminated in the current year. Documentation will need to be retained that confirms this is the case.

Please make sure you are familiar with the School Finance [Student Activity Funds](#) guidance if you are making any purchases regarding students.

The list below is not an exhaustive list. If you have questions about the eligibility, please contact your RPP DE Liaison.

Unallowable/Ineligible Expenditures
Alcoholic beverages (EDGAR 2 CFR Section §200.423)
Capital expenditures (i.e. buildings and land) (EDGAR 2 CFR Section §200.13)
Construction, renovation, and/or remodeling of facilities (exceptions include those related to corrections for safety or compliance issues i.e., labor required to rewire for code compliance) (EDGAR 2 CFR §200.439)
Consumables that are made into products to be sold or used personally by students, teachers and other persons. Items that are used by non CTE students are also not allowed. HF648
Contributions and donations (cash, property, services) (EDGAR 2 CFR §200.434)
Student travel costs (lodging, feeding, conveying, or furnishing transportation to conventions or other forms of social assemblage. (Title 34, volume 3, EDGAR §403.71)
CTSO effects for students' personal ownership (jackets, supplies, thumb drives), recreation, membership dues, data collection (Title 34, volume 3, EDGAR 403.71).
Entertainment (amusement and social activities, i.e., sports tickets) (EDGAR 2 CFR §200.438)

Food for Meetings: Generally, there is a very high burden of proof to show that paying for food and beverages is necessary to meet the goals and objectives of a grant. When a grantee is hosting a meeting, the grantee should structure the agenda for the meeting so that there is time for participants to purchase their own food, beverages, and snacks. In addition, when planning a meeting, grantees may want to consider a location in which participants have easy access to food and beverages. This holds true for RPP funds as well.

While these determinations will be made on a case-by-case basis, and there may be some circumstances where the cost would be permissible, it is likely that those circumstances will be rare. Grantees, therefore, will have to make a compelling case that the unique circumstances they have identified would justify these costs as reasonable and necessary.

OCTAE Guidance and ([EDGAR 2 CFR Part 200 §200.403](#))

Goods or services for personal use ([EDGAR 2 CFR §200.445](#))

Items retained by student (supplies, clothing/uniform, tools, calculators) ([EDGAR 2 CFR §200.445](#))

Insurance. The federal grant funds cannot be used to purchase insurance; “Districts must, at a minimum, provide the equivalent insurance coverage for real property provided to property owned by the non-Federal entity ([EDGAR 2 C.F.R., Part §200.310, Subpart D](#)).

Staff and Administration Memberships (Individual membership dues are ineligible; district memberships are eligible) ([EDGAR 2 CFR §200.454](#))

Non-instructional furniture ([EDGAR 2 CFR Part 200 §200.403](#))

PLTW expenditures if taught by math and science instructors without a CTE Authorization ([Project Lead the Way Guidance](#))

Professional development for personal benefit (tuition costs, exam fees) or for non CTE Instructors ([EDGAR 2 CFR §200.454](#)) The exception is MOC and the CTE Authorizations (see BOEE and Experience Requirements).

Promotional selling and marketing materials (T-shirts, pens, cups, key chains) ([EDGAR 2 CFR §200.467](#))

Scholarships ([EDGAR 2 CFR §200.466](#))

Textbooks for normal classroom delivery and not for a new course or course that has changed standards and benchmarks.