Title I, Part C – Migrant Education Program
What Program Administrators Need to Know

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Agenda

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2. Funding Authority
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4. Allocation Process
5. Data: Survey 5
6. Migrant Student Information Exchange (MSIX)
7. Allowability of Cost
8. Monitoring
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11. Equitable Services for Private Schools

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MEP Goals and Objectives

MEP Goals and Objectives

The Elementary and Secondary Education Act (ESEA), as amended by the Every Student Succeeds Act (ESSA), Title I, Part C, Section 1301, states:

"The purposes of this part are as follows:

(1) To assist States in supporting high-quality and comprehensive educational programs and services during the school year and, as applicable, during summer or intersession periods, that address the unique educational needs of migratory children.

(2) To ensure that migratory children who move among the States are not penalized in any manner by disparities among the States in curriculum, graduation requirements, and challenging State academic standards.

(3) To ensure that migratory children receive full and appropriate opportunities to meet the same challenging State academic standards that all children are expected to meet.

(4) To help migratory children overcome educational disruption, cultural and language barriers, social isolation, various health-related problems, and other factors that inhibit the ability of such children to succeed in school.

(5) To help migratory children benefit from State and local systemic reforms."

Primary Focus:

Student Achievement!!

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Funding Authority

Funding Authority

Public Law 103-382 – Elementary and Secondary Education Act (ESEA)of 1965, as amended by the Every Student Succeeds Act of 2015

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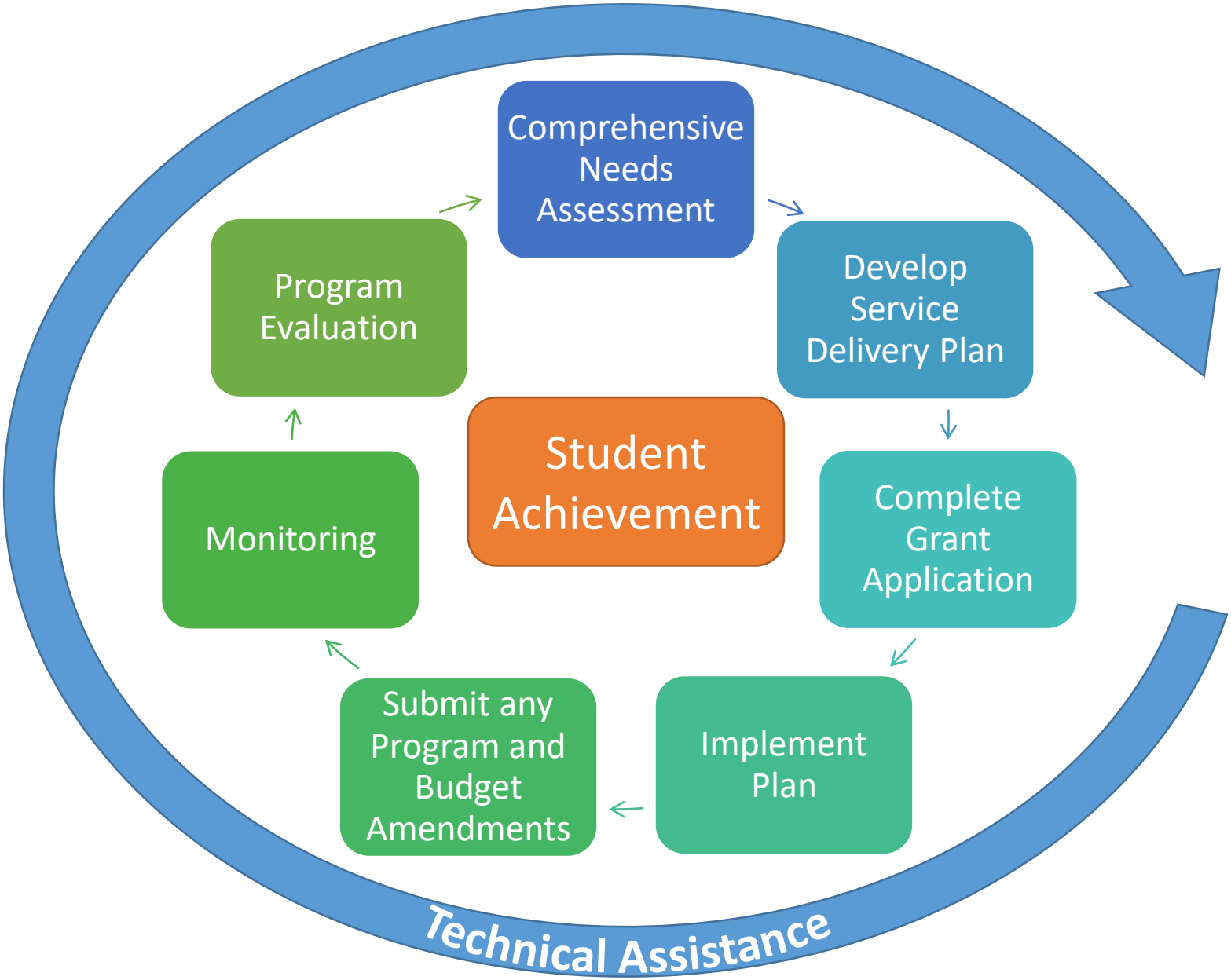
Application Process

Title I, Part C Program Development Cycle



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Allocation Process

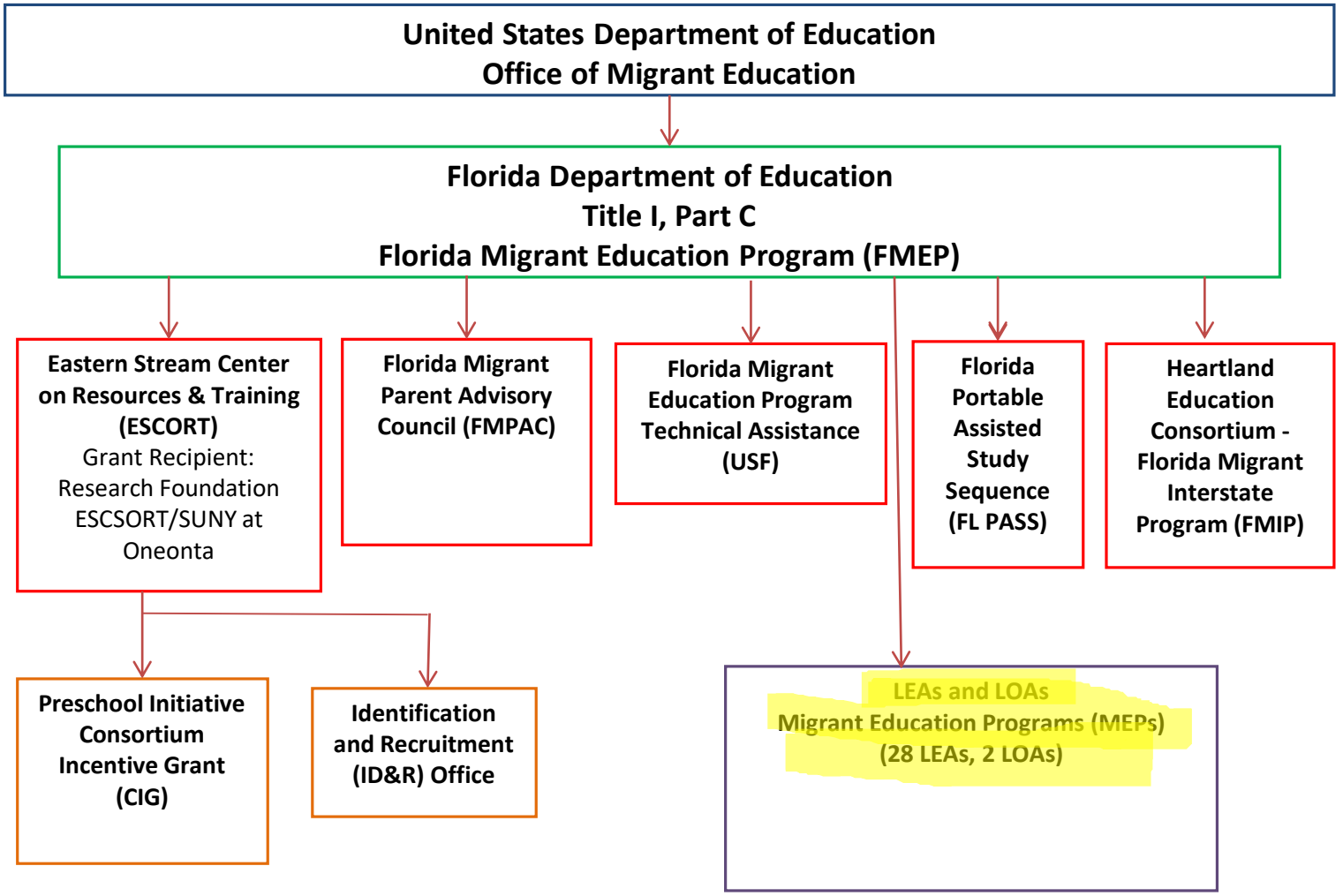
Funding Allocation

- **United States Department of Education (USED) – Office of Migrant Education (OME)** – The Every Student Succeeds Act (ESSA), which was signed into law on December 10, 2015, authorized MEP by Part C of Title I.
- **Florida Department of Education (FDOE)** – USED allocates Title I, Part C MEP funds to States through a statutory formula based primarily on the State's number of migratory children identified, the number of migrant children who receive summer services, and the State's per-pupil expenditure (PPE).
- **Sub-grantees**
  - Local Educational Agencies (LEAs) and Local Operating Agencies (LOAs)

Sub-Allocation Formula

- Number of migrant children
  - Identified in regular school year
  - Served in a migrant funded summer program
- Needs of migratory children
  - Low scores in State assessments, English Language Learners (ELL), retained, etc.
- Number of children identified as meeting criteria for Priority for Services (PFS)
- Availability of funds from Federal, State or local funds
  - Average State Per-Pupil Expenditure (PPE) vs. District PPE

Florida's Title I, Part C Allocation Flow



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Data: Survey 5

FDOE Surveys

PROGRAM	SURVEY 2	SURVEY 5	SURVEY 9
TITLE I, Part A Improving Programs for the Disadvantaged	X	X	
TITLE I, Part C Migrant Education Program		X	
TITLE I, Part D Children & Youth Who Are Neglected, Delinquent, or At-Risk		X	X
TITLE IX, Part A Homeless Education Program		X	

X = Program Uses Survey Data

Purpose of Survey 5

- For the Migrant Education Program, Survey 5 provides:
  - Data used for Federal reporting purposes
  - Data transmitted to State student database
  - Record transmissions sent during performance period

Impact of Survey 5

- Verifying data submissions to the State Student Information system is crucial as those data are used to determine many factors, including migrant counts.

- **Migrant counts = State allocation → local funding**

Survey 5: Migrant Status Terms

Code	Definition/Example
B	Enrolled/Served in BOTH Regular 180 day school year (Regular School Day/Extended) and Summer Term–This code should also be used for a student identified but not served in the regular 180 day school year, but then served in the summer term.
D	Enrolled/Served ONLY in Regular 180 day School Year with services provided during the regular school day only.
E	Enrolled/Served in Regular 180 day School Year with some or all services provided during an extended day/week.
S	Enrolled/Served ONLY in Summer Term– The student must be served in a partially or fully Migrant funded service component designed especially for Migrant students enrolled in conventional summer school (or intersession) in order for the student to be coded "S".
T	A non-attender served in BOTH the regular 180 –day school term (Regular School Day/Extended) and Summer Term – This code should also be used for a student IDENTIFIED, but not served in the 180 day school term, but then who is served in the summer term.
U	A non-attender enrolled/served ONLY in the regular 180-day school term – This code should be used for a migrant with services provided during the regular school day only.
V	A non-attender enrolled/served in regular 180-day school term – This code should be used for a migrant with some or all services provided during an extended day/week.
W	A non-attender enrolled/served ONLY in summer term – The student must be served in a partially or fully Migrant funded service component designed especially for Migrant Students enrolled in conventional Summer School (or intercession) in order for the student be coded "W."
X	Identified, NOT Served– Use this code if the child has been identified at any time during the school year or summer session, but NOT served (through the PK-12 school system or as a non-attender).

Migrant Status Term Example

Florida Department of Education
2017-18 Migrant Record Counts
Survey 5 as of 08/17/18

GQUV - F71269

District #	District Name	Student Demographic Format Migrant Status Term B	D	E	S	T	U	V	W	X	Z
1	SUNSHINE	18	47	0	10	5	0	66	25	460	32,034
2	OSPREY	0	0	0	0	0	0	0	0	0	5,390
3	FLAMINGO	155	2,382	17	0	0	1	0	0	297	203,456

Federal/State Compensatory Project Evaluation Format

Types of Migrant Services

- **Instructional Services** – reported in data element Federal/State Project, Area and Model in the field for Subject Area
- **Support Services** – reported in Support Services data element
- **Referred Services** – reported in Migrant Referred Services data element
- **Priority for Services** – reported in Migrant Priority for Services data element
- **Continuation of Services** – reported in Migrant Continuation of Services data element

Federal/State Project, Area and Model

Project Type

- 1 = Title I Basic, Part A
- **2 = Title I Migrant, Part C**
- 5 = Title I Migrant (Part C) funds blended with Title I Basic (Part A) funds
- 8 = Title III Immigrant Children and Youth

Federal/State Compensatory Evaluation Format Example

Florida Department of Education
2017-18 Migrant Record Counts
Survey 5 as of 08/17/18

GQUV - F71269

District #	District Name	Federal/State Compensatory Evaluation Format											
		Project Type		Priority for Services			Referred Services			Continuation of Services			
		2	5	N	Y	Z	N	Y	Z	A	B	C	Z
1	SUNSHINE	746	0	725	28	1,314	70	678	1,319	0	0	0	2,050
2	OSPREY	0	0	0	0	0	0	0	0	0	0	0	0
3	FLAMINGO	2,702	2	2,314	390	15,421	2,702	1	15,421	10	0	0	17,680

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Migrant Student Information Exchange (MSIX)

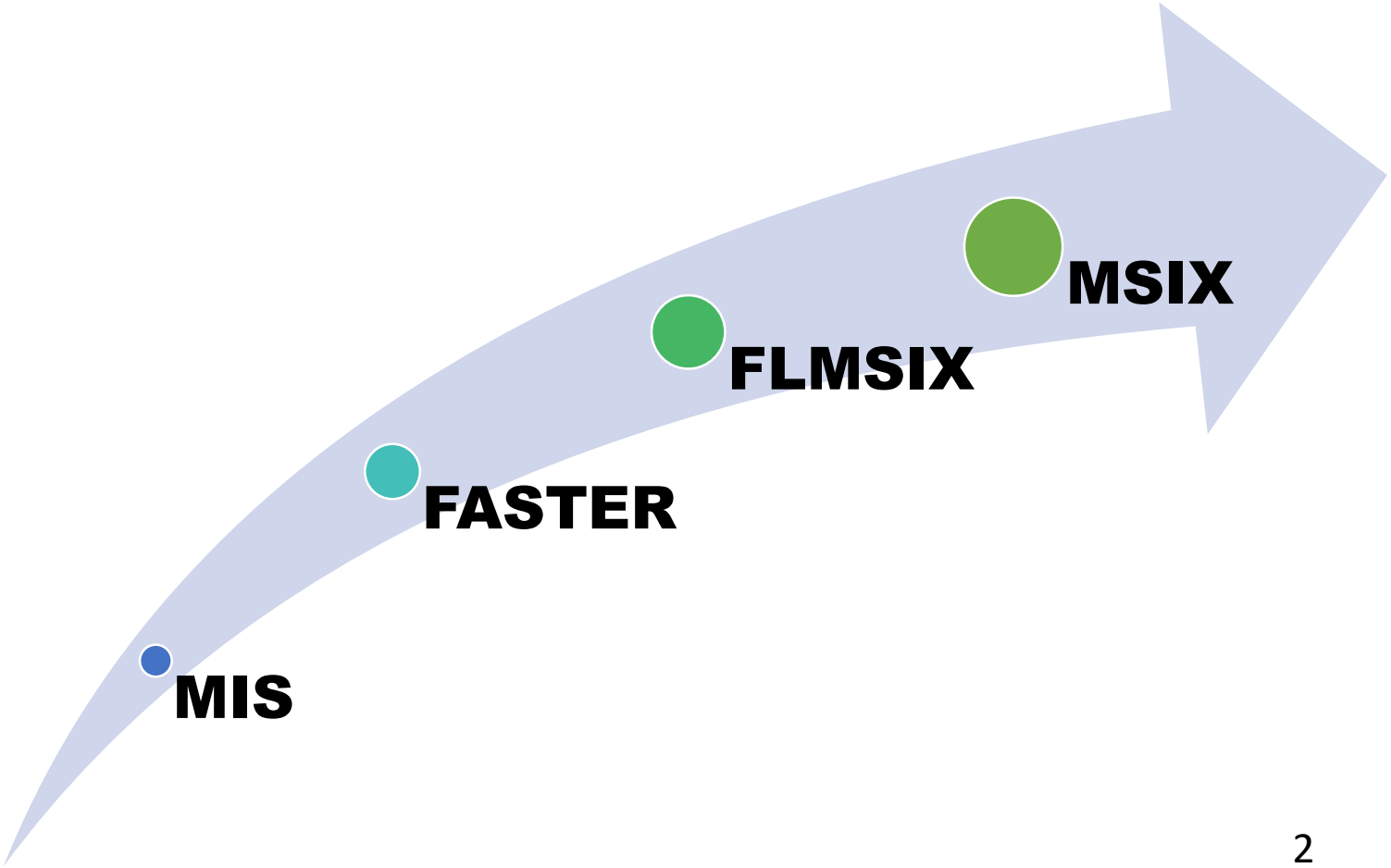
MSIX Background

- MSIX is a Web-based platform established and maintained by the US Department of Education (**USED**) that links States' migrant student record systems to facilitate the national exchange of educational and health information for migratory children.
- Local educational agencies (**LEAs**) are required to participate in MSIX, according to Section 1308(b)(2) of the Elementary and Secondary Education Act, as amended by the Every Student Succeeds Act.

What's in MSIX?

- Student information from multiple districts and States
- MSIX user information

How Does Data Enter MSIX?



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Allowability of Cost

Allowability of Cost in the MEP

- Budget items must align with the areas of need identified in the State Comprehensive Needs Assessment (CNA) and the Measurable Program Outcomes (MPOs) as described in the State Service Delivery Plan (SSDP) as well as the local needs assessment.
- Budget items should reflect the activities described in the program narrative.

State Comprehensive Needs Assessment

State Comprehensive Needs Assessment (CNA) incorporates the following:

- Florida Standards Assessment (FSA) data
- Statewide Florida Migrant Education Program (FMEP) evaluation data (gathered from local MEPs)
- District surveys
- Statewide CNA committee surveys
- Florida Migrant Parent Advisory Council (FMPAC) surveys

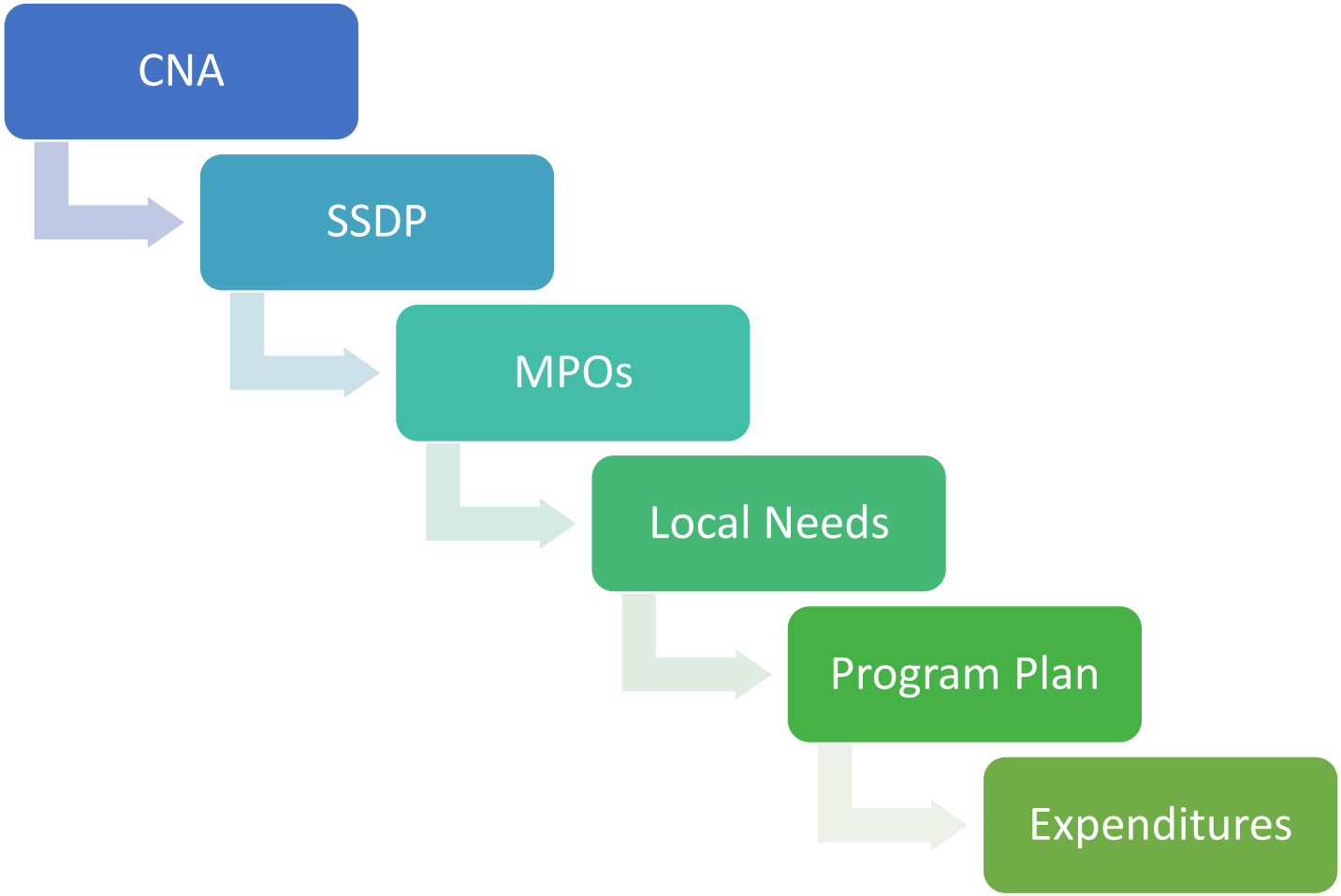
State Service Delivery Plan

- The State Service Delivery Plan (SSDP) is the implementation plan for Title I, Part C under the Every Student Succeeds Act (ESSA) Florida State Plan.
- The SSDP outlines strategies that Florida will implement to address the requirements of the law.

Measureable Program Outcomes (MPOs)

- MPOs indicate the specific growth expected from the migrant services provided
- MPOs tie service delivery to growth
- Three (3) year timeline: 2018-2021
- Seven areas of focus:
  1. Reading
  2. Mathematics
  3. High School Graduation
  4. High School Graduation Plus
  5. Early Childhood
  6. Out-of-School Youth
  7. Family Engagement

Aligning Expenditures With SSDP: A Linear Model



English/Language Arts (Reading) MPOs

2018 Service Delivery Plan	Strategies
ELA MPO1: By the end of project year 2020-2021, the percent of migrant students in grades 3-8 receiving at least 12 hours of supplemental academic instruction in ELA who achieve grade-level performance on the State assessment in ELA will increase by 3 percentage points over the 2018-2019 baseline **ELA MPO 2**: By the end of project year 2020-2021, at least 50% of migrant parents with children in grades K-8 who participate in a migrant parent educational advocacy program will report pre-post gains in educational engagement with their child.	• Identify and assist students who are falling behind before the grade 3 FSA • Provide supplemental academic instruction (after-school, extended school day tutoring, in-class resource teacher) for reading and math, including during summer

Mathematics MPO

2018 Service Delivery Plan	Strategies
Math MPO1: By the end of project year 2020-2021, the percent of migrant students in grades 3-8 receiving at least 12 hours of supplemental academic instruction in Mathematics who achieve grade-level performance on the State assessment in Mathematics will increase by 3 percentage points over the 2018-2019 baseline.	• Identify and assist students who are falling behind before the grade 3 FSA • Provide supplemental academic instruction (after-school, extended school day tutoring, in-class resource teacher) for reading and math, including during summer

Graduation MPO

2018 Service Delivery Plan	Strategies
Graduation MPO1: By the end of the project year 2020-2021, the percent of migrant students in grades 9-12 that are identified as at risk of failing or dropping out via early warning systems or graduation status reports who receive individual advocacy or academic support from the migrant education program and who subsequently advance to the next grade level or graduate will increase by three (3) percentage points over the 2018-2019 baseline.	• Offer credit accrual PASS and other options • Monitor (from entrance into HS) using early warning system indicators (failing grades, attendance, discipline, GPA, etc.) • Provide tutors to help ensure school materials are in a language students can understand • Educate parents about requirements for grade promotion (credits needed for promotion, requirements of EOC assessments, community service hours, attendance requirements, availability of resources such as tutorial sessions)

Graduation Plus MPOs

2018 Service Delivery Plan	Strategies
Graduation MPO2: By the end of the project year 2020-2021, the percent of migrant students in grades 9-12 served by the migrant education program who successfully complete at least one accelerated course or certification will increase by 4 percentage points over the 2018-2019 baseline. **Graduation MPO3:** By the end of project year 2020-2021, at least 50% of migrant parents with children in grades 9-12, who participate in a migrant parent educational advocacy program will report gains in knowledge of graduation requirements and student engagement strategies for promoting graduation.	• Enroll students in online accelerated courses (to enable them to complete a course even if they move mid-course) • Assist dual enrollment students with obstacles to course completion • Offer one-on-one assistance in the student's application process for accelerated courses

Early Childhood MPOs

2018 Service Delivery Plan	Strategies
EC MPO 1: By the end of project year 2020-2021, the percent of migrant pre-k children who are served by the migrant education program and complete Florida statewide school readiness assessment that are determined to be ready for school will increase by 3 percentage points over the 2018-2019 baseline. **EC MPO 2:** By the end of project year 2020-2021, at least 50% of migrant parents with children ages 3 to 5 not enrolled in Kindergarten who participate in a migrant parent program will report gains in educational engagement with their child.	• Provide in-home parent trainings to increase parent knowledge regarding kindergarten readiness skills • Provide summer Pre-K transition programs • Use curriculum aligned to the standards and appropriate for migrant/non-English speakers

Out of School Youth MPO

2018 Service Delivery Plan	Strategies
OSY MPO 1: By end of project year 2020-2021, the percent of migrant students that drop out of school in grades 9-12 who receive MEP advocacy or academic support who return to school or participate in a high school equivalency program within one year will increase by 15% over the 2018-2019 baseline.	• Assess student's knowledge base and course history to see why he or she is dropping out; determine what they know • Use early warning system indicators at least once a month; review more frequently for students showing higher risk of dropping out • Use MSIX to share information with other districts/States as the OSY travels

Phase I Analysis:
General Considerations for Allowable Costs

A. Consider requirements from Federal regulations and program requirements:

1. Is the proposed cost allowable based on instructions from UGG?
2. Is the proposed cost consistent with the Federal cost principles?

B. Consider requirements from the Federal awarding agency:

3. Is the proposed cost allowable based on agency-specific regulations?
4. Is the proposed cost allowable based on the related terms/conditions that govern the agency's award to/agreement with FDOE?
5. Is the proposed cost consistent with the grant project performance measures or benchmarks?

Phase I Analysis:
General Considerations for Allowable Costs

C. Consider requirements from applicable State guidance:

6. Is the proposed cost consistent with authorized grant program activities as described in the SSDP?
7. Is the proposed cost allowed by State expenditures guidance from State statutes, rules, regulations or guidance from Florida Department of Financial Services (DFS) and Florida Department of Management Services (DMS)?
8. Does the proposed cost comply with related grant program terms/conditions issued by FDOE for grant awards, contracts, purchase orders and other expenditure agreements?

D. Consider the period of performance:

9. Is the proposed cost for the allowed period of availability as defined for the funding program?

E. Consider other oversight instructions:

10. If Federal or State-level prior approval is required for the proposed cost, was this process followed?

Phase II Analysis: Specific factors affecting allowable costs

The proposed cost(s) is/are -

- Necessary
- Reasonable
- Allocable
- In conformance with Federal law and grant terms and conditions
- Consistent with State and local policies
- Consistently treated
- In accordance with generally accepted accounting principles (GAAP) and other standards
- Each non-Federal entity that receives Federal/State grant program funds must use accounting rules and procedures established by authoritative bodies or conventions that have evolved through custom and common usage.
- Not used as match on another Federal award
- Net of applicable credits (2 CFR §200.406)
- Adequately documented

Allowability of Cost Procedures

- Federal Uniform Grant Guidance (UGG) 2 CFR Part 200.302(7) requires each non-Federal entity that manages and administers federally-funded grant programs must maintain **adequate financial management systems** to ensure compliance with Federal grant program requirements.
- As such, **districts must have written procedures** in place for determining the allowability of costs in accordance with Subpart E – Cost Principles of this part and the terms and conditions of the Federal award.

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Monitoring

The Purpose of Monitoring

- Monitoring is a means of ensuring selected programs under the Every Student Succeeds Act (ESSA) meet Federal guidelines and are implemented with fidelity, as outlined in the project application, in order to increase student achievement.

- The monitor(s) look specifically at the programmatic regulations, as well as the expenditure of funds.

Audits vs. Monitoring

- What is the difference between an audit and monitoring?
  - Compliance monitoring and audits are conducted by different entities. Monitoring is conducted by FDOE staff, looking specifically at program implementation and the use of Federal funds.
  - On the other hand, the Auditor General's Office or other independent auditing firms conduct audits, which look at the fiscal aspects of a project and the programmatic issues closely linked to fiscal requirements.

Technical Assistance vs. Monitoring

- What is the relationship between technical assistance and monitoring?
  - A technical assistance visit is designed to provide support to an LEA in meeting the Federal program requirements.
  - A monitoring visit is designed primarily to determine the extent of an LEA's compliance with Federal program requirements, while at the same time providing technical assistance with any compliance areas.

Monitoring Types

- Onsite Monitoring
- Desktop Monitoring
- Targeted Monitoring
- Self-Monitoring
- Enhanced Self-Monitoring

Onsite Monitoring

- A monitoring visit designed primarily to determine the extent of an LEA's compliance with Federal and State program requirements, while at the same time providing technical assistance with any compliance areas.
- While onsite in the LEA, the FDOE may visit schools, classrooms, and conduct interviews.
- LEAs designated for onsite monitoring are provided an official report of the outcome of the review.

Desktop Monitoring

- A remote review of the LEA that is conducted by telephone between FDOE and LEA staff. Staff in schools and other facilities are typically not interviewed; however, the FDOE reserves the right to physically visit an LEA selected for desktop monitoring.
- LEAs designated for desktop monitoring are provided an official report of the outcome of the review.

Self-Monitoring

- A designation given to LEAs that are not selected for onsite or desktop monitoring. LEAs selected for this designation will be expected to complete self-monitoring requirements.
- Typically, there will not be interviews with LEA staff or a monitoring report.

Enhanced Self-Monitoring

- A subset of LEAs will be selected to complete additional enhanced self-monitoring activities.
- If an LEA falls into the lowest risk level for a program, but the FDOE determines an onsite or desktop review is not warranted, that LEA may be given additional self-monitoring submission requirements, or an “enhanced” self-monitoring to ensure compliance progress is being made.
- Enhanced self-monitoring programs will provide uploads for selected items.

How LEAs Are Selected for Monitoring

- A program-specific risk assessment is conducted each year for all LEAs in Florida. Based on the risk assessment and other program specific considerations, an LEA may be selected for desktop, onsite, or enhanced self-monitoring. Annually, all LEAs conduct self-monitoring requirements, at a minimum.

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Amendment Process and Guidance

Purpose of an amendment

The purpose of the amendment is to amend an active, approved project application. LEAs typically submit amendments for the following reasons:

- **Budget amendment -** Budget amendments are submitted when there is a change in the original project award amount or if there are budget revisions. Budget revisions may include function and object code changes.
- **Program amendment –** Program amendments are submitted when there is a change in the scope of the project.

When to submit an amendment:

Reason for Amendment	Required of Applicant			Response from FDOE
	DOE 150	DOE 151	Written Request	Amendment DOE 200
Change in scope, goals, or objectives	X	X	-	X
Change in project evaluation scope	X	X	-	X
Change in deliverables	X	X	-	X
Change in work task	X	X	-	X
Change in key or types of personnel	X	X	-	X
Disengagement of project director	X	X		X
Obtaining services of third party	X	X	-	X
Budget revision to implement program amendment	X	X	-	X
Increase project amount	X	X	-	X
Revise project period	-	-	X	X
Change reporting dates (program or fiscal)	-	-	X	X
Decrease allocation	-	-	X	X
Terminate program	-	-	X	X

http://fldoe.org/finance/contracts-grants-procurement/grants-management/

Office of Grants Management

Amendment Parameters

Before an amendment is submitted to the Program Office, ask:

- Are the budget items reasonable, necessary, and allocable? If you can't answer "yes" to all three, do not submit an amendment.
- If you can answer "yes, these budget items are reasonable, necessary and allocable," then the amendment will have to be aligned to (1) the ESSA State Plan, (2) the State Service Delivery Plan, (3) the approved grant application, and (4) local needs.

Amendment Procedures

1. Prepare the amendment on the appropriate forms (DOE 150 and DOE 151) from the FDOE.
2. For program amendments, project recipients shall describe in detail and justify the type of programmatic changes requested on the Project Amendment Request form (DOE 150).
3. For budget amendments, project recipients shall use the DOE 150 to describe in detail the reason for requesting a budget revision. All budget revisions must be reasonable, necessary, allocable, and legal to promote the objectives of the program. Project recipients shall include only the budget items that are being amended with a detailed description of each item on the DOE 151 form.

Amendment Procedures

4. The Project Amendment Request form (DOE 150) requires the original signature of the official who is authorized to legally bind the agency, e.g., superintendent, president, chairperson of the board, or their authorized representative, and must be sent to:

   Florida Department of Education
   Bureau of Contracts, Grants, and Procurement Management Services
   332 Turlington Building
   325 West Gaines Street
   Tallahassee, FL 32399-0400

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Supplement, Not Supplant

Supplement, Not Supplant

- The intent behind supplement, not supplant (SNS), is that Federal funds are not meant to substitute for State or local funds, but rather to provide for an additional layer of support for students who need extra academic assistance in order to succeed in school.
- LEAs must demonstrate that Federal funds are used to provide additional academic and support services, staff, programs, or materials the State or LEA would not normally provide.

Supplement, Not Supplant

The supplement, not supplant provision means, in general, that

- Federal funds may not be used to replace activities normally funded from State or local funds.
- State and local funds may not be diverted for other purposes due to the availability of Federal funds.
- Federal funds may not be used to support activities that are required by State law, State Board of Education rule, or local policy.
- Federal funds must be used to *supplement* activities already being provided by the LEA, meaning they must be used to *expand, enhance, or improve* existing services and activities or to create something *new*.

SNS Presumptions

Federal funds must be used to supplement and in no case supplant State and local resources.

Guiding question:

"What would have happened in the absence of the federal funds?"

It is presumed supplanting has occurred if:

- Federal funds were used to provide services required to be made available under other Federal, State, or local law.
- Federally-funded services were provided with non-Federal funds in the prior year.
- Title I Migrant funds were used to provide services to Title I Migrant students, and the same service is provided to non-Title I Migrant students using non-Title I Migrant funds.

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Equitable Services

Equitable Services for Private Schools

- The LEA shall consult with appropriate private school officials for the design and development of equitable services [ESSA: section 8501].
- Children who attend private school are eligible to receive MEP services if they:
  - (1) meet the statutory and regulatory definition of a migrant child; and
  - (2) meet the priority for services criteria

Equitable Services for Private Schools

- The LEA must identify the number of migrant students in private schools who meet the criteria for PFS.
- If there are migrant students in private schools who meet the PFS criteria, the LEA must identify any additional activities that will be conducted for them.

Note: The LEA has the discretion to determine what number of eligible students is too few to serve, so long as this determination is made on an equitable basis (i.e., on the same basis as public schools).

– U.S. Department of Education Non-Regulatory Guidance

Q/A

Any questions???

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