

Alaska Migrant Education Program

Spending Handbook



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Contents

Introduction	3
General Spending Considerations.....	3
Overview of Title I, Part C.....	4
Purpose	4
Migratory Child Defined.....	4
General Requirements of the MEP	4
District Grant Application.....	5
ESEA Consolidated Application	5
Activities Funded by the State	6
Annual Fall Training on the Identification & Recruitment of Migratory Children	6
Alaska Migrant Education Literacy Grant	6
State Parent Advisory Council (PAC).....	6
General Policy for Funding of Migrant Education Programs	7
Migrant Education Program Costs	7
Administration, Services, and Allowable Activities.....	7
Supplement, Not Supplant and Unaddressed Needs	9
Continuous Improvement Cycle	9
Contracts with Outside Vendors.....	11
Required Written Procedures Under UGG.....	11
Appendix	12
Acronyms/Abbreviations	12
Provision of Services Q&A.....	13
Uniform Grant Guidance.....	18
Allowable Cost Checklist for MEP Funds.....	19
Additional Resources	20

Introduction

This document provides general guidance on how districts may spend funds under the Every Student Succeeds Act (ESSA). ESSA is the most recent version of the Elementary and Secondary Education Act (ESEA) which was signed into law on December 10, 2015.

It is important to note that this handbook only provides an overview of the Title I-C rules and options; it does not discuss the many other compliance requirements that apply to the program. Agencies receiving federal funds must adhere to the regulations under the federal Uniform Grant Guidance (UGG) (2 CFR, Part 200), the Federal agency's regulations (such as the Education Department's General Administrative Regulations), and applicable Federal and State statutes and regulations. To learn more, visit the Alaska Department of Education and Early Development's [Federal Grants Management](http://education.alaska.gov/grants/fed-grants) (education.alaska.gov/grants/fed-grants) webpage.

General Spending Considerations

There are three general issues that affect districts spending under the Migrant Education Program (MEP).

First, all costs charged to U.S. Department of Education (ED) grants must be **necessary and reasonable** considering the amount of money being spent and the needs of the program.¹ This requirement comes from a set of Federal regulations known as the Uniform Grant Guidance (UGG), which applies to all Federal grants including ED grants.²

UGG affects ED grant spending in a number of ways. It:

- **Lists costs that may never be paid for with Federal funds.**³ For example, Federal funds can never pay for alcohol⁴ and typically cannot pay for lobbying.⁵
- **Lists general criteria all costs supported with Federal funds must satisfy.**⁶ For example, Federal funds can only pay for costs that are allocable to the relevant grant.⁷
- **Sets additional requirements for certain costs supported with Federal funds.**⁸ For example, districts that use Federal funds for employee salaries and benefits must keep records documenting how much time the employees spent on grant activities.⁹
- **Sets rules for how districts procure goods and services with Federal funds,**¹⁰ how they **track items** paid for with Federal funds,¹¹ and the **kinds of records** they must keep about their grant spending.¹²

Second, activities supported by ED funds must be **consistent with the district's application** for funds approved by DEED.¹³

Third, as discussed throughout this document, some ESSA programs require districts to spend on activities that are supported by evidence, are demonstrated to be effective, or that are consistent with a formal needs assessment. Even where this is not required, ED grant spending has the most impact when districts spend Federal funds on effective activities designed to meet program goals. To do this, districts are encouraged to:

- Carefully consider the needs of students, educators, and other relevant stakeholders,
- Determine which activities are most likely to effectively address those needs, and
- Prioritize those activities when deciding what costs to support with ESSA funds (unless those activities are being paid for by other funding sources).

¹ 2 CFR 200.403(a)

² The Uniform Grant Guidance (UGG) is contained in Part 200 of Title 2 of the [Code of Federal Regulations](#). U.S. Department of Education's [Technical Assistance for ED Grantees](#) contains more Federal guidance and other resources about the UGG.

³ See 2 CFR Part 200, Subpart E

⁴ 2 CFR § 200.423

⁵ 2 CFR § 200.450

⁶ See 2 CFR § 200.403

⁷ 2 CFR § 200.403(a)

⁸ See 2 CFR §§ 200.420-200.475

⁹ 2 CFR § 200.430

¹⁰ 2 CFR §§ 200.317-200.326

¹¹ 2 CFR §§ 200.313-200.314

¹² See, for example, 2 CFR § 200.318(h)(i) for procurement records or 2 CFR § 200.302(b)(3) for financial records.

¹³ 34 CFR § 76.700

Overview of Title I, Part C

Purpose

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.¹⁴

Migratory Child Defined

The term migratory child for Alaska means a child or youth who is entitled to free public education, or is not yet at grade level at which free public education is offered, made a qualifying move due to economic necessity across school district boundaries (or 20 or more miles to a temporary residence in a school district of more than 15,000 square miles) in the preceding 36 months: (A) as a migratory agricultural worker or a migratory fisher; or (B) with, or to join, a parent/guardian or spouse who is a migratory agricultural worker or a migratory fisher.¹⁵

General Requirements of the MEP

Districts that receive Title I, Part C funds must carry out a variety of activities as a condition of participating in the program including, but not limited to:

- Identifying and recruiting migratory children and youth.¹⁶
- Establishing and implementing a system of quality controls for the proper ID&R of eligible migratory children.¹⁷
- Promoting interstate and intrastate coordination of services for migratory children.¹⁸
- Conducting parent and family engagement in the planning and operation of the local MEP.¹⁹
- Identifying and addressing the unique educational needs of migratory children and youth.²⁰
- Evaluating the effectiveness of the MEP to improve services provided to migratory children.²¹

Each district that receives Title I, Part C funds must identify and address the unique educational needs of migratory children in accordance with the State's Comprehensive Needs Assessment and Service Delivery Plan that—

- is integrated with other programs under ESEA or other Acts, as appropriate;
- provides that migratory children will have an opportunity to meet the same challenging State academic standards that all children are expected to meet;
- specifies measurable program goals and outcomes;
- encompasses the full range of services that are available for migratory children from appropriate local, State, and Federal educational programs;
- is the product of joint planning among such local, State, and Federal programs, including programs under Title I-A, early childhood programs, and language instruction educational programs under Title III-A; and
- provides for the integration of services available under Title I-C with services provided by such other programs.²²

¹⁴ ESSA, Section 1301

¹⁵ ESSA, Section 1309(2-5)

¹⁶ ESSA, Section 1304(c)(8)

¹⁷ 2 CFR § 200.89(d)

¹⁸ ESSA, Section 1304(b)(3)

¹⁹ ESSA, Section 1304(c)(3)

²⁰ ESSA, Section 1306(a)(1)

²¹ 2 CFR § 200.84

²² ESSA, Section 1306(a)(1)

District Grant Application

ESEA Consolidated Application

Each school district operating a local MEP is funded by the Alaska Department of Education & Early Development (DEED) through a subgranting process. The total amount allocated to applicants is based on the availability of Federal funds and on subgranting factors determined by DEED. Title I-C MEP grant funds are not guaranteed. School districts are authorized by DEED to expend MEP funds through the approval of grant applications called the ESEA Consolidated Grant Application.

Funding

DEED considers the following factors in determining subgrants to school districts:

- The availability of other funds.
- The number of migratory eligible children served during regular school year.
- The number of migratory eligible children who were not served.
- The number of migratory children served during the summer.
- The number of migratory children in grades 3-9 scoring below or far below proficient on at least one State summative assessment in ELA and mathematics.
- The number of migratory children meeting the priority for services (PFS) definition.
- Identification & recruitment needs based on the total number of eligible migratory children and youth.

Application

The ESEA Consolidated Application is a single, consolidated application for all ESEA formula entitlements, including the following: Title I-A, Title I-C, Title I-D, Title II-A, Title III-A, and Title IV-A. The consolidated application is completed using an electronic web-based application, known as the [Grants Management System \(GMS\)](https://gms.education.alaska.gov/) (gms.education.alaska.gov/).

For assistance in completing the Title I-C portion of the ESEA Consolidated Application, consult the PowerPoint for Title I-C located in the GMS Document Library or contact the Migrant Program Manager.

- [Grants Management System](https://gms.education.alaska.gov/) (gms.education.alaska.gov/)
- [ESEA Consolidated Application Handbook](https://gms.education.alaska.gov/documentlibrary/) (gms.education.alaska.gov/documentlibrary/)

Funding Period

The funding period is July 1 through June 30.

Starting during the FY22 Final Expenditure Report process, all districts that receive Title I, Part C Migrant Education Program funding within the ESEA Consolidated Application may carryover up to 100% of their Title I-C funds. It is not a requirement that districts carry all their Title I-C funds forward into the next fiscal year. Districts should consider only carrying forward Title I-C funds they will be able to reasonably expend in the upcoming fiscal year.

Activities Funded by the State

Annual Fall Training on the Identification & Recruitment of Migratory Children

DEED provides annual training for recruiters, records managers, migrant coordinators, and Federal programs coordinators in the fall. Most expenses for attending the training are reimbursable to the district.

Funding

DEED considers the approximate number of attendees and their projected costs to attend training. This information is provided to DEED during the registration process in the spring annually.

Grant

DEED issues a Staff Development (SD) Grant to districts. This grant is comprised of various funding streams that enable DEED to reimburse district staffs' travel expenses. MEP funds may only be used for district staff that attended approved MEP activities.

Funding Period

The funding period is July 1 through June 30. Carryover is not permitted.

Alaska Migrant Education Literacy Grant

The Alaska Migrant Education Literacy Grant is a supplemental migrant education grant awarded to districts who choose to participate. The goal of this supplemental grant is to support districts in improving literacy of migratory children and their families. Family literacy nights are encouraged, as well as supporting literacy efforts of migratory children who are not yet in school and those who have dropped out of school.

Funding

The total amount allocated to applicants is based on the availability of Federal funds.

DEED considers the following factors when determining the award amount: 1) how many districts applied, and 2) the estimated number of migratory eligible children that will be participating (taken from district's submitted application).

Application

The one-page application annually is sent to districts in the spring. The district describes the identified needs migratory children and youth and how the grant will raise their academic achievement. Additionally, the district provides the estimated number of migratory children that will participate in the grant.

Final Report

The one-page final report is sent to participating districts in the spring of each year. The district provides the final number of books ordered and the number of migratory children that participated in this grant. Additionally, the district describes how the grant helped raise academic achievement and achieve the local migrant education goals.

Funding Period

The funding period is July 1 through June 30. Carryover is not permitted.

State Parent Advisory Council (PAC)

The [Alaska Migrant Education State Parent Advisory Council](http://education.alaska.gov/esea/titlei-c/pac) (education.alaska.gov/esea/titlei-c/pac) meets annually and is comprised of members from six (6) regions in Alaska. The council helps the Department develop, implement and review plans for the State MEP.

Funding

DEED considers the approximate number of in-person meetings and the distance which the PAC representative would have to travel to attend the meetings when determining the allocation amount for each grant.

Grant

Allocations are provided to districts that nominated a representative who was selected to be in the State PAC. It is the district's responsibility to book any travel and accommodations for their State PAC representative to attend the meetings.

Funding Period

The funding period is July 1 through June 30. Carryover is not permitted.

General Policy for Funding of Migrant Education Programs

Migrant Education Program Costs

All MEP costs must be directly correlated with the educationally related activities provided to migratory children and youth that enable them to succeed in school.

Migrant program costs are separate from and above the cost of core instruction and are in addition to all costs normally incurred in the absence of the MEP. The MEP costs are supplemental to the core curriculum and other programs, such as Title I-A and Title III.

The district shall ensure that each approved activity and budget item:

1. exists for the educational benefit of eligible migratory children and youth based on identified needs; and
2. clearly supplements all other services for which the child is eligible and will not be used to supplant services which are provided to the non-migratory children.

When determining if MEP funds may be used to support a particular activity or service, the district must determine the following:

1. the activity or service comports with the results of the State's [Comprehensive Needs Assessment \(CNA\)](http://education.alaska.gov/ESEA/TitleI-C) (education.alaska.gov/ESEA/TitleI-C) and the strategies outlined in the State's [Service Delivery Plan \(SDP\)](http://education.alaska.gov/ESEA/TitleI-C) (education.alaska.gov/ESEA/TitleI-C);²³
2. the MEP funds must first be used to meet the identified needs of migratory children that result from their migratory lifestyle, and to permit these children to participate effectively in school;²⁴
3. the activity or service meets the needs of migratory children that are not addressed by services available from other Federal or non-Federal programs;²⁵
4. the MEP funds are used to supplement, rather than supplant, the use of non-Federal funds;²⁶ and
5. the costs of the service or activity must comport with the cost principles described in the [Uniform Grant Guidance \(Subpart E of 2 CFR Part 200\)](http://ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200) (ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200). The cost principles require, among other things, that costs of the service or activity be reasonable and necessary, and be allocable (or chargeable) to the MEP relative to the benefit received.²⁷

In terms of numbers 3 and 4 in the list above, documentation of efforts to investigate non-MEP resources is important for quality control. It also serves as evidence of compliance with the statute in case of a State or Federal monitoring or audit. For example, if you speak with service agencies, another Federal Program Director, or district officials, be sure to document the name and title of individuals you spoke with and the date of the conversation.

Administration, Services, and Allowable Activities

Administrative Costs

Administrative costs are any costs, indirect or direct, that are administrative in nature and support the management of the Title I-C program. Costs of program administration may encompass both direct (i.e., salaries of program administrators, costs of program monitoring and preparing program plans, and the purchasing of program specific equipment and supplies) and indirect costs.

For MEP funds, there is not statutory language limiting administrative funds for subgrantees. However, some programs have a requirement that a specified percentage be spent on direct services to children (i.e., Title III-A and Title IV-A). Although the MEP is specifically exempted from this statute, it is Alaska's guidance that the MEP will aim to direct the preponderance of funds towards direct services to migratory children and youth.

²³ ESSA, Section 1306(a)

²⁴ ESSA, Section 1306(b)(1)

²⁵ ESSA, Section 1306(b)(2)

²⁶ 34 CFR § 200.87

²⁷ 2 CFR § 200

Services

The U.S. Department of Education, Office of Migrant Education (OME) has issued specific non-regulatory guidance to define what constitutes a service in the MEP. For purposes of the MEP, services are a subset of all the activities that the MEP provides through its programs and projects. Although State Education Agencies (SEAs) and districts may spend MEP funds on many types of allowable activities some of these activities do not constitute a service (e.g., identification and recruitment or parent and family engagement activities). Services are distinct in that they are the educational or educationally related activities provided to migratory children to enable them to succeed in school. Because student success is the overarching goal of the MEP, services are a vital aspect of the program.

Services are those educational or educationally related activities that:

- directly benefit a migratory child;
- address a need of a migratory child consistent with the State Education Agency's (SEA) [Comprehensive Needs Assessment \(CNA\)](#) ([education.alaska.gov/ESEA/TitleI-C](#)) and [Service Delivery Plan \(SDP\)](#) ([education.alaska.gov/ESEA/TitleI-C](#));
- are evidence-based or, in the case of support services, are a generally accepted practice; and
- are designed to enable the program to meet its measurable outcomes and contribute to the achievement of the State's performance targets.²⁸

OME differentiates services per the following definitions:

- **Instructional Services** – educational activities for preschool aged children and instruction in elementary and secondary schools, such as tutoring before and after school
- **Support Services** – educationally related activities, such as advocacy for migratory children; health, nutrition, and social services for migratory families; necessary educational supplies; transportation

Districts have used a wide variety of service delivery designs. Examples include, but are not limited to:

- extended day programs;
- before/after school programs;
- in-class programs;
- Saturday or vacation programs;
- summer or intersession programs;
- in-home instruction (i.e., the MEP provides family literacy services to the child at home); and
- distance learning programs (i.e., web-based or portable courses of instruction).²⁹

Priority for Services (PFS)

As funding is not available to meet all needs of all migratory children, ESEA implemented a priority for services (PFS) requirement. MEP programs must first give priority to migratory children who have made a qualifying move within the previous 1-year period and who— (1) are failing, or most at risk of failing, to meet the challenging State academic standards; or (2) have dropped out of school.³⁰

Allowable Activities

Examples of allowable activities that do not constitute a service:

- identification and recruitment;
- parent and family engagement;
- program evaluation;
- professional development;
- administration of the program; or
- handing out leaflets to migratory families on available reading programs as part of an effort to increase the reading skills of migratory children.³¹

²⁸ Non-Regulatory Guidance, Chapter V, #A1

²⁹ Non-Regulatory Guidance, Chapter V, #A7

³⁰ ESSA, Section 1304(d)

³¹ Non-Regulatory Guidance, Chapter V, #A4

Supplement, Not Supplant and Unaddressed Needs

Supplement, not supplant means that funds must be used to provide for extra support or services. ESEA specifically applies the following rule to MEP funds: all Federal funds under this program shall supplement and not supplant all other non-Federal funds.³² The MEP statute makes it clear that **MEP services are in addition to, not in lieu of**, other services that can or should be provided by the core educational program or by any other program.

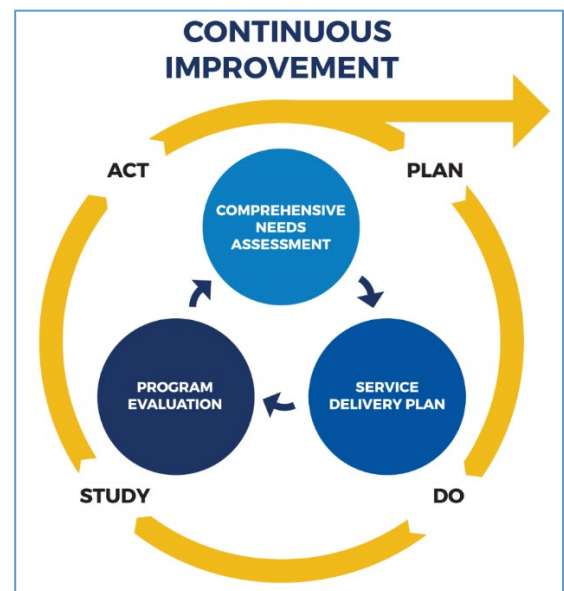
Each of the instructional services provided with MEP funds must be supplemental to the core instruction provided by a district, and whenever possible, should NOT occur during the regular school day. If services are provided during the school day, the district must document the supplemental nature of the service.

The MEP statute also requires that MEP funds be used to address the needs of migratory children that are not addressed by services available from other Federal or non-Federal programs.³³ This is very similar to the supplement, not supplant rule, but it applies to services funded by Federal or non-Federal programs. In essence, it means that if there are other services available that address the needs of migratory children (including services provided with Title I- A or Title III funds), then migratory children must be selected for, and provided those services, on the same basis as other eligible children—prior to applying MEP funds.

Continuous Improvement Cycle

In this continuous improvement cycle, each step in developing a program—assessing needs, identifying strategies, implementing strategies, and evaluating the results builds on the previous activity and informs the subsequent activity.

The Comprehensive Needs Assessment, in turn, informs the Service Delivery Plan. In the process of developing a plan for providing services to migratory children, a planning team reviews the strategies, prioritizes them, and develops a statewide plan for implementing them. The program evaluation assesses the level of implementation, and the MEP uses the results to improve its delivery of services, in particular for migratory children identified under the Priority for Services (PFS) provision, as required under Code of Federal Regulations, Title 34, § 200.84. The MEP also uses the program evaluation to determine the progress of migratory children toward Federal and State goals. The program evaluation feeds into the needs assessment process and the cycle continues.



Needs Assessment

Districts must conduct a needs assessment in order to provide services that will meet the identified needs in accordance with the comprehensive State plan for service delivery.

At the district, a needs assessment determines:

- the extent of the needs of migratory children and youth in that project area and how those needs relate to the priorities the State has established;
- how to design local services; and
- which children should receive services.³⁴

Districts identify such critical elements as the specific needs of children by grade levels, the academic areas in which the project should focus, the instructional settings, materials, staffing, and teaching techniques.

³² 34 CFR § 200.87

³³ ESSA, Section 1306(b)(2)

³⁴ Non-Regulatory Guidance, Chapter V, #A9

Service Delivery

The district should:

1. identify the eligible migratory children with unique educational needs who are expected to reside in the area;
2. determine the educational and educationally related needs of the children to be served;
3. determine the focus of the program (i.e., instructional areas and/or grade levels) based on a needs assessment; and
4. select children with the greatest need for MEP services according to their Priority for Service (PFS) status.³⁵

It is important to design services that are of sufficient intensity to provide reasonable promise of the project's ability to meet its measurable outcomes. In turn, the attainment of these outcomes enables the program to help migratory children succeed in school and to contribute to the achievement of the State's performance targets.³⁶

Measurable Outcomes

The State develops measurable outcomes for the MEP that are appropriate measures of the success of the program and that contribute to the achievement of the State's performance targets. These measurable outcomes are defined in the State's SDP. The district must then develop measurable outcomes that are aligned with the State's measurable outcomes for the MEP.³⁷

Evaluation

Evaluation means systematically and methodically collecting information about a program or some aspect of a program in order to improve the program or make decisions about the merit or worth of the program.³⁸ Districts evaluate the effectiveness of the program by comparing the results of the program against: (1) the measurable outcomes established for the MEP, and (2) the State's performance targets.³⁹

Evaluations allow districts to:

1. determine whether the program is effective and document its impact on migratory children;
2. improve program planning by comparing the effectiveness of different types of interventions;
3. determine the degree to which projects are implemented as planned and identify problems that are encountered in program implementation; and
4. identify areas in which children may need different MEP services. A proper evaluation can provide powerful information regarding how best to use MEP funds to achieve the desired result.⁴⁰

An evaluation that examines program implementation is typically conducted while a program is in operation to provide information on how the program may be improved. For example, a project administrator may want to investigate whether a new or re-designed project is being implemented as described in the approved application and to examine problems that the project is encountering in the implementation. The evaluator might use tools like structured observations or surveys to answer questions like:

1. was the project implemented as described in the approved project application;
 - a. if not, what changes were made;
2. what worked in the implementation;
3. what problems did the project encounter; and
4. what improvements can be made.

Evaluations that examine program implementation provide early feedback to administrators, who use the information to improve or strengthen the project by reallocating resources, including time and money, into the most productive uses. Examples of common improvements include providing more or better training, changing instructional materials, changing inefficient or burdensome operating procedures, and strengthening administrative support.⁴¹

³⁵ Non-Regulatory Guidance, Chapter V, #A6

³⁶ Non-Regulatory Guidance, Chapter V, #A5

³⁷ Non-Regulatory Guidance, Chapter VIII, #B6

³⁸ Non-Regulatory Guidance, Chapter VIII, #A1

³⁹ Non-Regulatory Guidance, Chapter VIII, #C2

⁴⁰ Non-Regulatory Guidance, Chapter VIII, Preface

⁴¹ Non-Regulatory Guidance, Chapter VII, #A3

Contracts with Outside Vendors

Procurement transactions must be conducted in a manner providing for full and open competition consistent with applicable Federal and State statutes and regulations. Awards will be made to the lowest responsive and responsible bidder. All policies and practices at the district and regional level (as they pertain to subcontracts with outside vendors) must also be consistent with the requirements in 2 Code of Federal Regulations (CFR) 200.318 – 200.326, including but not limited to:

1. full and open competitive bidding for services;
2. establishment of a clear process and written criteria for reviewing proposals, assessing technical qualifications of contracted personnel, and assessing the quality of the technical approach for service;
3. performance of a clear, cost-benefit analysis for the required service; and
4. identification, avoidance, and reporting of conflicts of interest in procuring goods and services 2 CFR 200.318(c).

Per 2 CFR 200.318(c), grantees and subgrantees will maintain a written code of standards governing the performance of their employees engaged in the award and administration of contracts. No employee, officer or agent of the grantee or subgrantee shall participate in the selection, or in the award or administration of a contract supported by Federal funds if a conflict of interest, real or apparent, would be involved. Such a conflict would arise when the employee, officer or agent, member of the immediate family, employee's partner, or organization which employs or is about to employ any of the above has a financial or other interest in the firms selected for the award. The grantees' or subgrantees' officers, employees or agents will neither solicit nor accept gratuities, favors, or anything of monetary value from contractors, potential contractors, or parties to subgrantees. If the grantee or subgrantee has a parent, affiliate or subsidiary organization that is not a State, local or tribal government, the written standards of conduct must also cover organizational conflicts of interest.

Subgrantees must develop policies and procedures for identifying conflicts of interest, per 2 CFR 200.318(c) and a recusal process.

Any and all procurement documentation for outside services shall be maintained in the operating agency office and available upon request to DEED. Approval of such contracts shall be based on the following requirements:

1. the contract shall not remove direct responsibility from the contractor for any portion of the functions for which DEED holds the operating agency responsible;
2. the contract shall not duplicate services already available from the operating agency, DEED or other governmental entities;
3. all proposed new or renewal contracts and lease agreements shall be made available to DEED upon request;
4. the proposed contracts for personal consulting services shall include all necessary information pursuant to the application and the services to be provided;
5. no lease contract shall extend beyond the end of the grant period without a release clause allowing termination with no penalty if the contract is not approved in the succeeding grant period; and
6. cash advances for non-formula contracted services, are not allowed.

Procurement Documentation: All procurement transactions must comply with the audit and record retention requirements.

Required Written Procedures Under UGG

The Uniform Grant Guidance (2 CFR, Part 200) requires all sub-recipients of federal funds to document certain grant procedures. These written procedures will help the sub-recipient meet compliance by outlining the steps necessary to ensure allowable grant costs and methods such as general procurement standards. Written procedures regarding the following areas are required of All sub-recipients must have these written procedures on file and the steps outlined in the procedures implemented.

- [Determining Allowable Costs](https://education.alaska.gov/esea/fedgrants/determining-allowable-costs-with-federal-fund.docx) (education.alaska.gov/esea/fedgrants/determining-allowable-costs-with-federal-fund.docx)
- [Cash Management](https://education.alaska.gov/esea/fedgrants/cash-management-of-federal-funds.docx) (education.alaska.gov/esea/fedgrants/cash-management-of-federal-funds.docx)
- [Conflict of Interest](https://education.alaska.gov/esea/fedgrants/conflict-of-interest.docx) (education.alaska.gov/esea/fedgrants/conflict-of-interest.docx)

Appendix

Acronyms/Abbreviations

<i>Acronym</i>	<i>Meaning</i>
CFR	Code of Federal Regulations
CNA	Comprehensive Needs Assessment
COS	Continuation of Services
DEED	Alaska Department of Education & Early Development
ED	US Department of Education
EL	English Learner
ELA	English Language Arts
ESEA	Elementary and Secondary Education Act
ESSA	Every Student Succeeds Act
FY	Fiscal Year
GMS	Grants Management System
GPRA	Government Performance and Result Act
IDEA	Individuals with Disabilities Education Act
ID&R	Identification and Recruitment
LEA or LOA	Local Education Agency / Local Operating Agency (School District)
MB	Migrant Literacy Grant
MDEs	Minimum Data Elements
MEO	Migrant Education Office at the State of Alaska, DEED
MEP	Migrant Education Program
MP	Migrant State Parent Advisory Council Travel Grant
MPO	Measurable Program Outcomes
NCLB	No Child Left Behind Act
NRG	Non-Regulatory Guidance
OME	U.S. Department of Education's Office of Migrant Education
OSY or OY	Out of School Youth
PAC	State Parent Advisory Council
PFS	Priority for Service
SD	Staff Development Grant
SDP	Service Delivery Plan
SEA	State Education Agency
SP	Supplemental Programs
UGG	Uniform Grant Guidance

Provision of Services Q&A

In general, what may districts use MEP funds for?⁴²

- Instructional services (e.g., activities for preschool-age children and instruction in elementary and secondary schools, such as tutoring before and after school);
- Support services (e.g., educationally related activities, advocacy for migratory children; health, nutrition, and social services for migratory families; necessary educational supplies; transportation, providing access to health and social service providers);
- Professional development (e.g., training programs for school personnel to enhance their ability to understand and appropriately respond to the needs of migratory children);
- Parent Advisory Council (PAC) and other parent and family engagement activities;
- Identification and recruitment;
- Coordination activities with other agencies, both within the State and with other States nationwide, including the transfer of student records;
- Comprehensive needs assessment activities; and
- Evaluation of the MEP.

For purposes of the MEP, what are “services”?⁴³

“Services” are a subset of all the activities that the MEP provides through its programs and projects. “Services” are those educational or educationally related activities that:

1. directly benefit a migratory child;
2. address a need of a migratory child consistent with the State’s comprehensive needs assessment and service delivery plan;
3. are evidence-based; and
4. are designed to enable the program to meet its measurable outcomes and contribute to the achievement of the State’s performance targets.

What is “evidence-based”?⁴⁴

The term “evidence-based” means an activity, strategy, or intervention that—

1. demonstrates a statistically significant effect on improving student outcomes or other relevant outcomes based on—
 - a. strong evidence from at least 1 well-designed and well-implemented experimental study;
 - b. moderate evidence from at least 1 well-designed and well-implemented quasi-experimental study; or
 - c. promising evidence from at least 1 well-designed and well-implemented correlational study with statistical controls for selection bias; or
2. demonstrates a rationale based on high-quality research findings or positive evaluation that such activity, strategy, or intervention is likely to improve student outcomes or other relevant outcomes; and includes ongoing efforts to examine the effects of such activity, strategy, or intervention.

What types of services may an SEA or district provide with MEP funds?⁴⁵

Districts may use MEP funds to provide the following types of services:

1. Instructional services (e.g., educational activities for preschool-age children and instruction in elementary and secondary schools, such as tutoring before and after school); and
2. Support services (e.g., educationally related activities, such as advocacy for migratory children; health, nutrition, and social services for migratory families; necessary educational supplies; transportation).

⁴² Non-Regulatory Guidance, Chapter X, #F4

⁴³ Non-Regulatory Guidance, Chapter V, #A1

⁴⁴ ESSA, Section 8101(21)

⁴⁵ Non-Regulatory Guidance, Chapter V, #A3

What are some examples of allowable activities that do not constitute a service?⁴⁶

Activities related to identification and recruitment activities, parent and family engagement, program evaluation, professional development, or administration of the program are examples of allowable activities that are not considered services. Another example would be handing out leaflets to migratory families on available reading programs as part of an effort to increase the reading skills of migratory children. Although this is an allowable activity, it is not a service because it does not meet all of the criteria of what a service is.

Why is it important for districts to provide services of sufficient intensity in operating the MEP?⁴⁷

It is important to design services that are of sufficient intensity to provide reasonable promise of the project's ability to meet its measurable outcomes. In turn, the attainment of these outcomes enables the program to help migratory children succeed in school and to contribute to the achievement of the State's performance targets.

How should the district select students for services?⁴⁸

The district should:

1. Identify the eligible migratory children with special educational needs who are expected to reside in the area (statewide or locally);
2. Determine the educational and educationally related needs of the children to be served;
3. Determine the focus of the program (i.e., instructional areas and/or grade levels) based on a needs assessment; and
4. Select children with the greatest need for MEP services according to their Priority for Service (PFS) status.

How may districts provide services to migratory children?⁴⁹

Districts have used a wide variety of service delivery designs. Some examples include (this is not an exhaustive list):

- Extended day programs;
- Before/after school programs;
- In-class programs;
- Saturday or vacation programs;
- Summer or intersession programs;
- In-home instruction (e.g., the MEP provides family literacy services to the child at home); and
- Distance learning programs (e.g., Web-based or portable courses of instruction)

What should the district keep in mind when considering if and when MEP funds may be used to support particular activities?⁵⁰

The district must determine the following:

1. The activity or service comports with the results of the State's Comprehensive Needs Assessment (CNA) and the strategies outlined in the State's Service Delivery Plan (SDP).
2. MEP funds must first be used to meet the identified needs of migratory children that result from their migratory lifestyle, and to permit these children to participate effectively in school.
3. The activity or service meets the needs of migratory children that are not addressed by services available from other Federal or non-Federal programs.
4. The MEP funds are used to supplement, rather than supplant, the use of non-Federal funds.
5. The costs of the service or activity must comport with the cost principles described in the Uniform Guidance (Subpart E of 2 CFR Part 200). The cost principles require, among other things, that costs of the service or activity be reasonable and necessary, and be allocable (or chargeable) to the MEP relative to the benefit received.

In terms of numbers 3 and 4 in the list above, documentation of efforts to investigate non-MEP resources is important for quality control. It also serves as evidence of compliance with the statute in case of a State or Federal monitoring or audit.

⁴⁶ Non-Regulatory Guidance, Chapter V, #A4

⁴⁷ Non-Regulatory Guidance, Chapter V, #A5

⁴⁸ Non-Regulatory Guidance, Chapter V, #A6

⁴⁹ Non-Regulatory Guidance, Chapter V, #A7

⁵⁰ MEP Policy Question & Answers, Office of Migrant Education, January 2018

For example, if you speak with service agencies, another Federal program director, or district officials, be sure to document the name and title of individuals you spoke with and the date of the conversation.

Are there circumstances in which a district may continue to provide MEP services to children who are no longer eligible for the MEP?⁵¹

Yes. The statute provides three circumstances in which a district may continue to provide services to children whose eligibility has ended:

1. a child's eligibility ends during the school term and the agency provides services for the duration of the term;
2. a child's eligibility ends and the agency provides services for an additional school year because comparable services are not available through other programs; and
3. a district continues to serve students who were eligible for services in secondary school through credit accrual programs until they graduate.

Note: Before the district provides services under these provisions, it should consider whether the child's unmet unique educational needs are addressed by the general school program and whether migratory children who have a priority for services have already been served.

Who has priority for services in the MEP?⁵²

Section 1304(d) of the statute gives priority for services to migratory children who have made a qualifying move within the previous 1-year period and who—

- are failing, or most at risk of failing, to meet the challenging State academic standards; or
- have dropped out of school.

Contact the Alaska Department of Education & Early Development – Migrant Education Office for more information regarding the identification of priority for services children.

May the MEP serve children who do not meet the “priority for services” criteria?⁵³

Yes. Districts may serve children who do not meet the “priority for services” criteria so long as they serve children who meet the criteria first.

May a district use MEP funds to provide English language services to migratory children who are English learners?⁵⁴

Yes. Districts may provide these services to migratory children who are English learners if:

1. a needs assessment demonstrates that the service is necessary to address an unmet need; and
2. the funds are not used to enable the district to meet its Title VI of the Civil Rights Act of 1964 responsibilities.
 - a. For example, a school may use MEP funds to hire bilingual staff to help English learner children learn content areas such as reading and math. In addition, a school may use MEP funds to provide English language instruction to help English learner children learn English. In both cases, the MEP services must supplement those that the school district offers in the regular program.

May the MEP serve migratory children with disabilities?⁵⁵

Yes. Districts must coordinate their provision of MEP services with other Federal programs, such as Individuals with Disabilities Education Act (IDEA), in order to increase program effectiveness. However, in providing services, districts must be careful not to violate the MEP's “supplement, not supplant” requirement. Districts are required to provide migratory children access to the same Federal, State, and locally funded services that non-migratory children with disabilities receive to address their needs, and may not use MEP funds to provide services that school districts are required by law to provide through other programs.

⁵¹ Non-Regulatory Guidance, Chapter V, #A9

⁵² ESSA, Section 1304(d)

⁵³ Non-Regulatory Guidance, Chapter V, #B7

⁵⁴ Non-Regulatory Guidance, Chapter V, #E3

⁵⁵ Non-Regulatory Guidance, Chapter V, #G9

Is it an allowable use of MEP funds to purchase laptop computers, iPads, and other electronic devices for migratory students to keep indefinitely?⁵⁶

The Office of Migrant Education considers such purchases to be an unallowable use of MEP funds because the MEP would not be able to assure that the devices are used solely for authorized purposes, nor would the MEP be able to maintain effective control over the devices once the students' MEP eligibility ends. In accordance with the cost principles that guide Title I, Part C grants, in order to be considered allowable, costs must be allocable or chargeable to the MEP, relative to the benefit received (see 2 Code of Federal Regulations (CFR) §200.405)]. In addition, 2 CFR § 200.302 (b) (4), requires grantees and subgrantees to have financial management systems that maintain effective control and accountability for all funds, property, and other assets. This same provision requires grantees and subgrantees to adequately safeguard all such property and must assure that it is used solely for authorized purposes. If the MEP were to purchase electronic devices (e.g. laptop computers, iPads) for students to keep, it would be extremely difficult to determine the purposes for which they were being used. Moreover, the SEA would have no control over the electronic devices when the students' MEP eligibility ends.

If the MEP wishes to purchase electronic devices for migratory children to use (rather than "to keep") while they are receiving services from the Program, it might consider the following options:

1. The MEP may purchase computers or mobile computer devices (e.g., laptops or iPads) that it can use year after year to provide instruction/training to migratory students. In this situation, the MEP retains ownership and oversight of the computers and devices while also being able to use the devices for multiple years.
2. The MEP may share the cost of computer and mobile computer device purchases with another program, assuming that each program utilizes the devices for a period of time relative to each program's share of the cost. In this situation, the MEP may opt to share costs with another program because during particular times of the year migratory children may not reside in the State and the MEP could cut costs by allowing another program to use the devices during these times.
3. A loan system may be implemented for MEP-owned computers and mobile computer devices (e.g., laptops or iPads), which would allow students to check out the technology to use at home. The MEP should establish basic procedures for checking in with students about their uses of the devices (e.g., require students to sign a good-faith agreement to use the equipment for specific, academically-related purposes, limit access to certain software or websites which are not academically-related) and for returning the devices at the end of the project or term.

The aforementioned options might allow the resources to benefit more students, while still maintaining ownership and oversight by the MEP.

Can MEP funds be used to pay the cost of physical examinations and athletic fees for eligible migratory children, as required for participation in school athletics?⁵⁷

The use of MEP funds for eligible migratory students' physical examinations and athletic fees (as required for participation in school athletics) might be an allowable support service. The Office of Migrant Education recommends that you consider the following factors in determining whether to pay for physicals and athletic fees with MEP funds:

- What policies does the school district have in place for any student athlete that cannot afford the costs associated with sports participation? Migratory students are entitled to the same benefits that the district provides for all students. If the district does not provide the necessary assistance, then MEP funds might be used to pay for the eligible migratory students.
- Has the possibility of referred services been explored?

What are examples of health services that States and districts might provide to eligible migratory children with MEP funds?⁵⁸

Preventive health services may be provided to eligible migratory children where other sources of health services are unavailable. Some examples: medical and dental screenings, immunizations, and health education.

⁵⁶ MEP Policy Question & Answers, Office of Migrant Education, Federal FY14, v.1

⁵⁷ MEP Policy Question & Answers, Office of Migrant Education, Federal FY12, v.1

⁵⁸ MEP Policy Question & Answers, Office of Migrant Education, Federal FY12, v.3

Emergency or one-time treatments may also be provided to eligible migratory children with MEP funds. Some examples: infections, fractures, open wounds, tooth extractions/repairs, eye glasses, and behavioral intervention needs.

The Office of Migrant Education does not believe districts should provide ongoing or long-term health services, non-emergency surgeries, treatment of chronic illness or diseases, or orthodontia services regardless of whether these services are also preventive. Furthermore, if a State or district provides health support services, the agency must ensure that the service is tied to helping the child meet his or her learning need and that the funds are included in their budgets as a result of the State's Comprehensive Needs Assessment (CNA) and Service Delivery Plan (SDP).

Can MEP funds be used to provide food for eligible migratory families as a stopgap measure when other resources are not available?⁵⁹

Services such as the provision of food for eligible migratory families should be provided by non-MEP local programs such as a community food bank.

Can MEP funds be used to provide instructional or support services for parents of migratory children?⁶⁰

No. The district may consider the feasibility of providing a family literacy program per Section 1304(c)(6)(C) of the statute.

Must a district serve eligible migratory children who attend private schools?⁶¹

Yes. Section 8501 of the statute requires districts that receive MEP funds to provide special educational services or other benefits on an equitable basis to eligible children who are enrolled in private schools, and to their teachers and other educational personnel. This must be done after timely and meaningful consultation with appropriate private school officials.

See DEED's [Private School and the ESEA](http://education.alaska.gov/esea/private-schools) (education.alaska.gov/esea/private-schools) webpage for more information.

⁵⁹ MEP Policy Question & Answers, Office of Migrant Education, Federal FY12, v.1

⁶⁰ MEP Policy Question & Answers, Office of Migrant Education, Federal FY12, v.1

⁶¹ Non-Regulatory Guidance, Chapter V, #H1

Uniform Grant Guidance

Organization of the Uniform Guidance

- Subpart A – Acronyms and Definitions
- Subpart B – General Provisions
- Subpart C – Pre-Federal Award Requirements and Contents of Federal Awards
- Subpart D – Post Federal Award Requirements
- Subpart E – Cost Principles
- Subpart F – Audit Requirements
- Appendices III-V and VII – Indirect Cost/Cost Allocation Plans
- Appendix XI – Compliance Supplement

Cost Principles

Fundamental Principles

- responsibility for the efficient and effective administration through the application of sound management practices;
- responsibility for administering an award in a manner consistent with underlying agreements, program objectives, and the terms and conditions;
- having accounting practices consistent with principles in Subpart E and documenting all costs;
- responsibility for employing sound organization and management techniques to assure proper and efficient administration; and
- not earn or keep profit, unless authorized by the terms and conditions of the award.

*Allowability*⁶²

General Considerations in Determining Allowability:

- Is the cost reasonable and necessary for the program?
- Is the expense in compliance with laws, regulations and grant terms?
- To what extent is the expense allocable to the grant?
- Is the cost adequately documented?
- Is it consistent with grantee rules that apply to both Federally funded and non-Federally funded activities?

*Reasonable*⁶³

A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost.

General Considerations in Determining Reasonableness:

- Do sound business practices support the expenditure?
- What is reasonable?
- Is the cost ordinary and necessary?
- Has proper consideration been given to factors such as arm's-length bargaining, sound business practices, other Federal requirements?
- Are the costs comparable to market prices for comparable goods or services in the geographic area?
- Have all concerned acted with prudence, considering their responsibilities to the organization, community, and others?
- Does it adhere to established practices and policies?

*Allocable Costs*⁶⁴

Allocable means the good or service can be assigned to an award or cost objective in accordance with the relative benefit achieved.

If a cost benefits two or more projects, activities, or programs in proportions that can be determined without undue effort or cost, the cost should be allocated to the projects based on the proportional benefit.

⁶² 2 CFR §200.403

⁶³ 2 CFR §200.404

⁶⁴ 2 CFR §200.405

Allowable Cost Checklist for MEP Funds

Except where otherwise authorized by statute, costs must meet the following general criteria in order to be allowable under Federal awards. Answering “Yes” to all of the following questions implies that a cost may be allowable.

Is the cost:

Necessary (2 CFR § 200.403(a))

- Is the cost necessary to carry out the plan of the Federal program? ☐ Yes ☐ No

Reasonable (2 CFR § 200.404)

- Did the agency follow its purchasing or procurement procedures? ☐ Yes ☐ No
- Is the cost in line with fair market prices for comparable goods or services? ☐ Yes ☐ No
- Would a “prudent person” agree that the item is reasonable? ☐ Yes ☐ No

Conforming to Limitations or Exclusions (2 CFR § 200.403(b))

- Is the cost permissible and NOT disallowed under the 55 specific items of cost found in the Uniform Grant Guidance 2 CFR § 200.420-475? ☐ Yes ☐ No
- Is the cost permissible under the program statute and regulations? ☐ Yes ☐ No
- Is the cost permissible under the terms and conditions of the sub award? ☐ Yes ☐ No
- Is the cost permissible under State statute? ☐ Yes ☐ No
- Is the cost permissible under the agency policies? ☐ Yes ☐ No

Consistent with Policies and Procedures (2 CFR § 200.403(c))

- Are the agency’s policies and procedures consistent among funding sources? ☐ Yes ☐ No
- Do the agency’s policies and procedures apply the same rules for Federal programs as they do for State and local programs? ☐ Yes ☐ No
- Would the cost be the same amount if it was funded by a State or local program? ☐ Yes ☐ No

Accorded Consistent Treatment (2 CFR § 200.403(d))

- Is the cost excluded from the agency’s indirect cost rate? ☐ Yes ☐ No
- Is the cost treated the same for the Federal program as it is for State and local programs? ☐ Yes ☐ No

Allocable (2 CFR § 200.405(a))

- Is the cost incurred specifically for the Federal program? ☐ Yes ☐ No
- If the cost benefits the Federal program and other work of the agency, was the cost distributed in proportions that may be approximated using reasonable methods? ☐ Yes ☐ No
- Was the cost not incurred because another grant ran out of funds? ☐ Yes ☐ No

Determined in Accordance with Generally Accepted Accounting Principles (2 CFR § 200.403(e))

- Is the cost determined in accordance with Generally Accepted Accounting Principles (GAAP) or as otherwise provided for in the Uniform Grant Guidance? ☐ Yes ☐ No

Not used for cost sharing or matching requirements (2 CFR § 200.403(f))

- Is the cost not being used to meet cost sharing or matching requirements of any other Federally-financed program? ☐ Yes ☐ No

Adequately Documented (2 CFR § 200.403(g) and 2 CFR § 200.302(b)(3))

- Do you have the documentation demonstrating the need, the purchase, and use of the item? ☐ Yes ☐ No
- Do you have records that identify the source and application of funds and contain information regarding authorizations, obligations, unobligated balances, assets, expenditures, income and interest that are supported by source documentation? ☐ Yes ☐ No

Supplemental

- Does the cost meet the supplemental requirements of the Federal grant program? ☐ Yes ☐ No

Additional Resources

U.S. Department of Education

Legislation

- [The Every Student Succeeds Act \(ESSA\)](https://oese.ed.gov/offices/office-of-formula-grants/school-support-and-accountability/essa-legislation-table-contents/) (oese.ed.gov/offices/office-of-formula-grants/school-support-and-accountability/essa-legislation-table-contents/)
- [Family Education Rights and Privacy Act \(FERPA\)](https://studentprivacy.ed.gov/) (studentprivacy.ed.gov/)
- [Department of Education's General Education Provisions Act \(GEPA\), Section 427](https://www2.ed.gov/fund/grant/apply/appforms/appforms.html) (www2.ed.gov/fund/grant/apply/appforms/appforms.html)

Regulations

- [Code of Federal Regulations \(Part 200\)](https://ecfr.gov/current/title-34/subtitle-B/chapter-II/part-200) (ecfr.gov/current/title-34/subtitle-B/chapter-II/part-200) – As required by the statute, the U.S. Department of Education issues a set of regulations implementing the programs under Title I of the Elementary and Secondary Education Act of 1965, as amended. The current regulations that apply to the Title I-C Migrant Education Program begin in Section 200.81.
- [Code of Federal Regulations \(Part 299\)](https://ecfr.gov/current/title-34/subtitle-B/chapter-II/part-299) (ecfr.gov/current/title-34/subtitle-B/chapter-II/part-299) – General Provisions.
- [Code of Federal Regulations \(Parts 74-99\)](https://ecfr.gov/current/title-34) (ecfr.gov/current/title-34) – Parts 74-99 are collectively known as the Education Department General Administrative Regulations (EDGAR). These parts contain regulations for administering discretionary and formula grants awarded by ED.

Guidance

- [Non-Regulatory Guidance for Title I, Part C, Education of Migratory Children \(March 2017\)](#)
- [Non-Regulatory Guidance: Fiscal Changes and Equitable Services Requirements ESSA](#)

Webpages

- [Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](https://www2.ed.gov/policy/fund/guid/uniform-guidance/index.html) (www2.ed.gov/policy/fund/guid/uniform-guidance/index.html)
- [Education Department General Administrative Regulations \(EDGAR\) and Other Applicable Grant Regulations](https://www2.ed.gov/policy/fund/reg/edgarReg/edgar.html) (www2.ed.gov/policy/fund/reg/edgarReg/edgar.html)
- [Every Student Succeeds Act \(ESSA\)](https://oese.ed.gov/offices/office-of-formula-grants/school-support-and-accountability/the-elementary-secondary-education-act-the-every-student-succeeds-act-of-2016/every-student-succeeds-act-essa/) (oese.ed.gov/offices/office-of-formula-grants/school-support-and-accountability/the-elementary-secondary-education-act-the-every-student-succeeds-act-of-2016/every-student-succeeds-act-essa/)
- [Migrant Education Program](https://oese.ed.gov/offices/office-of-migrant-education/migrant-education-program/) (oese.ed.gov/offices/office-of-migrant-education/migrant-education-program/)
- [RESULTS](https://results.ed.gov/) (results.ed.gov/)

Alaska Department of Education & Early Development

- [Alaska Migrant Education Program Webpage](https://education.alaska.gov/ESEA/TitleI-C) (education.alaska.gov/ESEA/TitleI-C)
- [Federal Grants Management](https://education.alaska.gov/grants/fed-grants) (education.alaska.gov/grants/fed-grants)
- [Annual Fall Training Resources](https://livebinders.com/play/play/2029583) (livebinders.com/play/play/2029583)
- [Alaska State Comprehensive Needs Assessment \(CNA\)](https://education.alaska.gov/ESEA/TitleI-C) (education.alaska.gov/ESEA/TitleI-C)
- [Alaska State Service Delivery Plan \(SDP\)](https://education.alaska.gov/ESEA/TitleI-C) (education.alaska.gov/ESEA/TitleI-C)
- [Needs Assessment Guidance](https://education.alaska.gov/ESEA/TitleI-C/docs/NeedsAssessmentGuidanceTitleI-C.pdf) (education.alaska.gov/ESEA/TitleI-C/docs/NeedsAssessmentGuidanceTitleI-C.pdf)
- [Provision of Services Guidance](https://education.alaska.gov/ESEA/TitleI-C/docs/ProvisionofServicesGuidanceTitleI-C.pdf) (education.alaska.gov/ESEA/TitleI-C/docs/ProvisionofServicesGuidanceTitleI-C.pdf)
- [Program Evaluation Guidance](https://education.alaska.gov/ESEA/TitleI-C/docs/ProgramEvaluationGuidanceTitleI-C.pdf) (education.alaska.gov/ESEA/TitleI-C/docs/ProgramEvaluationGuidanceTitleI-C.pdf)
- [Allowable Cost Checklist for Federal Funds](https://education.alaska.gov/ESEA/TitleI-C/docs/AllowableCostChecklist.pdf) (education.alaska.gov/ESEA/TitleI-C/docs/AllowableCostChecklist.pdf)
- [Grants Management System \(GMS\)](https://gms.education.alaska.gov/) (gms.education.alaska.gov/)
- [ESEA Consolidated Application Handbook](https://gms.education.alaska.gov/DocumentLibrary/) (gms.education.alaska.gov/DocumentLibrary/)