

# Title I-C Round Table Discussion ESEA Grants Workshop, April 2014

## USE OF FUNDS Q & A

Excerpted from Pages 65-68 & 122 of the *Non-Regulatory Guidance for the Title I, Part C Education of Migratory Children*, updated October 2010

**Statutory Requirements:**

Title I, Part C, Sections 1304(c)(6) and 1306(b)

Title IX, Sections 9101(37) and 9501

**Regulatory Requirements:**

34 CFR 200.29 (c)(1); 200.83; 200.86; 299.6-299.9

---

### IN GENERAL, STATES AND DISTRICTS MAY USE MEP FUNDS FOR:

- 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 migrant children; health, nutrition, and social services for migrant 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 migrant children);
- PAC and other parental involvement 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”?

“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 migrant child; (2) address a need of a migrant child consistent with the State’s comprehensive needs assessment and service delivery plan; (3) are grounded in scientifically based research or, in the case of support services, are a generally accepted practice; 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 ARE SOME EXAMPLES OF ALLOWABLE ACTIVITIES THAT DO NOT CONSTITUTE A SERVICE?

Activities related to identification and recruitment activities, parental involvement, 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 migrant families on available reading programs as part of an effort to increase the reading skills of migrant children.

---

## HOW MANY STATES AND DISTRICTS PROVIDE SERVICES TO MIGRANT CHILDREN?

Some examples include:

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

---

## OTHER SITUATIONS:

MEP funds may not be used to provide instructional or support services for parents of migrant children.

When the use of funds is questionable, follow these guidelines:

1. Does the district have a policy in place to provide this funding?
2. Has the possibility of referred services been explored?
3. Does it meet the following criteria?
  - a. The activity or service comports with the results of the State CNA and SDP.
  - b. MEP funds are first used to meet the identified needs of migrant children that result from their migrant lifestyle, and to permit these children to participate effectively in school.
  - c. The activity or service meets the needs of migrant children that are not addressed by services available from other Federal or non-Federal programs
  - d. The MEP funds are used to supplement, rather than supplant, the use of non-Federal funds.
  - e. The costs of the service or activity must comport with the cost principles described in OMB Circular A-87 (Code of Federal Regulations, CFR, part 225). The costs of the service or activity must be reasonable and necessary.  
(MEP Questions & Answers, Office of Migrant Education, FY12 v.1, page 2)

---

## WHAT ARE EXAMPLES OF HEALTH SERVICES STATES AND DISTRICTS MIGHT PROVIDE TO ELIGIBLE MIGRATORY CHILDREN WITH MEP FUNDS?

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.

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 (OME) does not believe that States and 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 CNA and SDP.

(MEP Questions & Answers, Office of Migrant Education, FY12 v.3, page 2)

---

CAN MEP FUNDS BE USED TO PROVIDE FOOD FOR ELIGIBLE MIGRANT FAMILIES AS A STOPGAP MEASURE WHEN OTHER RESOURCES ARE NOT AVAILABLE?

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

(MEP Questions & Answers, Office of Migrant Education, FY12 v.1, page 1)

---

CAN MEP FUNDS BE USED TO PROVIDE INSTRUCTIONAL OR SUPPORT SERVICES FOR PARENTS OF MIGRANT CHILDREN?

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

(MEP Questions & Answers, Office of Migrant Education, FY12 v.1, page 1)