

MIGRANT EDUCATION PROGRAM (MEP) SUBGRANTING

Office of Migrant Education (OME)



The mission of the Office of Migrant Education is to provide excellent leadership, technical assistance, and financial support to improve the educational opportunities and academic success of migratory children, youth, agricultural workers, fishers, and their families.

Objectives

- Understand the basic requirements and options available to State educational agencies (SEAs) in subgranting MEP funds
- Discuss examples of subgranting processes with MEP colleagues in other States

Getting Started

Let's practice:

1. Raise your hand.
2. Use the comment box: Sarah Martinez.
3. Mute your phone in preparation of open conversation.

Participants

- Sarah Martinez, Office of Migrant Education
- Shawn Cockrum, Missouri MEP
- Dr. Kulwadee Axtell, Nevada MEP
- Terry Garrett, Washington MEP

References

Statute

Sections 1302, 1304(b)(5), 1304(d), and 1309(1) of the *Elementary and Secondary Education Act (ESEA)* of 1965, as amended by the *Every Student Succeeds Act (ESSA)* of 2015

Code of Federal Regulations

34 CFR Part 76, Subparts E – G (76.400 – 76.783) and 2 CFR Part 200

Guidance

Chapter I, Section D and Chapter XI, Section B of the *Non-Regulatory Guidance for the Title I, Part C Education of Migratory Children* (October 2003)

BASICS OF SUBGRANTING

Overview

- A **subgrant** is an award of financial assistance, in the form of money, made under a grant by a grantee to an eligible subgrantee.

(see 34 CFR 77.1 and 2 CFR 200.92)

Overview

- SEAs may choose to deliver MEP services directly, or through local operating agencies (LOAs).
- An LOA is defined as:
 - A local education agency (LEA),
 - A public or private agency, or
 - The SEA, if the SEA operates the MEP directly.

(see sections 1302 and 1309(1) of the ESEA, as amended)

Overview

- The SEA must ensure that LOAs receiving subgrants comply with all applicable statutory and regulatory requirements.
- The SEA has the sole authority for determining which LOAs receive subgrant awards.
 - No LOA is entitled to receive an MEP subgrant.

(see 34 CFR 76.770 and 2 CFR 200.331)

REQUIRED CONSIDERATIONS

Four Required Factors

In determining the amount of any subgrants the SEA will award to LOAs, the SEA must take into account:

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(see section 1304(b)(5) of the ESEA, as amended)

Four Required Factors

In determining the amount of any subgrants the SEA will award to LOAs, the SEA must take into account:

1. Numbers of migratory children;
2. Needs of migratory children;
3. Migratory children who have “priority for services” (PFS);
and
4. Availability of funds from Federal, State, and local programs.

(see section 1304(b)(5) of the ESEA, as amended)

Numbers

The SEA must consider the numbers of migratory children in the area to be served, but has considerable latitude in deciding how to include this factor in the subgrant process. For example, the SEA may consider the number of migratory children who:

- Reside, or are expected to reside, in the project area;
- Are served by, or are expected to be served by, the project;
- Are/will be served relative to the total number of eligible migratory children who reside, or are expected to reside, in the project area

Needs

SEAs must consider the needs of migratory children, based on its statewide comprehensive needs assessment (CNA).

However, SEAs

- Are not required to take into account *all* of the identified needs of migratory children in the subgrant process, and
- May choose to fund a project that proposes to address additional needs of migratory children (needs that were not identified in the Statewide CNA, but which were identified in a particular project area)— if services are not available from other funding sources.

Priority for Services (PFS)

- SEAs must consider the statutory requirement to prioritize specific migratory children in providing MEP-funded services.
- Migratory children with priority for services (PFS) are those who made a qualifying move within the previous 1-year period and
 - 1) are failing, or most at risk of failing, to meet the challenging State academic standards; or
 - 2) have dropped out of school.

(see section 1304(d) of the ESEA, as amended)

Other Available Funds

SEAs must consider the availability of other funds that an LOA may leverage to provide services to migratory children. For example, SEAs may

- Examine the funding levels of programs that the LOA implements and that are available to migratory children, or
- Evaluate the availability of other Federal, State, or local funds by collecting data on per-pupil expenditures.

Other Factors

In addition to the four required factors, the SEA may also consider additional factors when determining amounts for subgrants, such as

- Nature, scope, and cost of the projects to be implemented; and
- State CNA and Service Delivery Plan (SDP) priorities.

COMMON SUBGRANT PROCESSES:

FORMULA

NEGOTIATION

COMBINATION

Formula Approach

The SEA determines the amount of MEP funds available for award to each LOA by:

- Using quantitative data to generate a total number of points for each LOA.
 - The proportion of an LOA's points of the grand total of points is used to determine the amount of funds the SEA will award to each LOA.
- In the formula approach, the SEA typically applies weights to each factor, so some factors will produce a higher number of "points".
- While the four required factors must be included in the formula, the SEA has flexibility in determining what data will be used for calculating these factors and how much weight each factor will receive.

Sample Formula

Factor	Data Sources	Weight
<p>Number – Total:</p> <ul style="list-style-type: none"> Served during the Regular School Year Served during the Summer Eligible, not served 	<ul style="list-style-type: none"> Student demographic data <i>(Determine how eligible migratory child data is used for this calculation, e.g., Category 1 and Category 2 Child Counts)</i> 	Highest weight (e.g., 75%)
<p>Needs – Total Number of migratory children in need of services aligned to the CNA and SDP, such as:</p> <ul style="list-style-type: none"> Academic performance, e.g., math, reading, science Students retained during the school year English Learners Drop outs and/or OSY Early Childhood Special Education Students experiencing homelessness 	<ul style="list-style-type: none"> State assessment data Student demographic data Student End of Year status <p><i>(Identify migratory student data codes)</i></p>	Somewhat less weight than PFS (e.g., 8%)
<p>Priority for Services (PFS) <i>(There may be some overlap with the needs described above – the important distinction is that PFS criteria requires a qualifying move within the previous 1-year period)</i></p>	<p>Migrant Status <i>(Use migrant student data codes identifying children who meet PFS criteria)</i></p>	Higher weight than overall needs (e.g., 15%)
<p>Availability of Other Funds</p> <ul style="list-style-type: none"> District’s Per Pupil Expenditure (PPE) compared to the State Average PPE 	<p>Prior year’s PPE for both the district and the state. <i>[States may decide to weight this category if the district’s PPE is considerably lower (set a % determination) than the State’s average].</i></p>	Lowest weight (e.g., 2%)

Negotiation Approach

In the negotiation approach, the SEA

- Defines how the four required factors and any additional factors will be applied in the subgrant process;
- Reviews a description of the proposed activities and the budget request submitted by the LOA; and
- Determines the final subgrant amounts based on the quality of the proposal and any negotiated adjustments.

Negotiation Approach

- The SEA does not establish (by formula) a predetermined amount that each eligible LOA may receive.
- The SEA establishes a Request for Proposals (RFP) or application process.
- This may result in more than one entity submitting a proposal to serve the same district or area, or might allow for consortia to submit proposals to serve children across multiple districts or areas.

Combination Approach

The combination approach involves the SEA using a two-pronged approach to award MEP funds to LOAs:

1. The SEA may establish a base amount by formula for which all eligible LOAs apply through the application process.

The SEA may apply weights to each factor, as described in the formula approach.

2. The SEA may negotiate final subgrant amounts with each LOA based on the quality of the applications submitted.

For example, the SEA may apply bonus points for addressing certain high priority issues or subtract points for services not included.

POST-AWARD OVERSIGHT

Monitoring and Reporting

SEAs have a responsibility to monitor LOA subgrants, and should have several means to ensure that LOAs serve migratory children effectively and spend funds in allowable and strategic ways. State directors should

- Require subgrantees to maintain documentation of project activities;
- Require subgrantees to conduct an evaluation of project activities that includes both implementation (process) and outcomes (impact) review and data;
- Require an end of year (EOY) report and budget sheet reflecting actual expenditures; and
- Monitor program subgrantees at least once during the funding cycle.

Carryover

- The SEA has sole discretion as to whether LOAs will be allowed to carryover MEP funds not used during one grant period into the following grant year.
- The SEA may allow the LOA to carryover funds for an additional period following the end of the subgrant period, or
- The SEA may require all unused funds to revert back to the State at the end of the subgrant period.
 - The SEA can choose to use the reverted MEP funds in a number of ways. Some examples include redistribution to:
 - Supplement summer MEP programs,
 - Fund special MEP activities to address high priority needs, or
 - Be included in the next year's subgrant allocations.

DISCUSSION WITH MEP STATE DIRECTORS

THANK YOU

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