



Federal Program Compliance Division

ESSASupport@tea.texas.gov

Title I, Part C Frequently Asked Questions

This document provides the answers to program-related questions received by the Division. You can also navigate through the document using the Bookmarks in your PDF viewer. The newest questions added or updated responses will be noted by “*” and in blue font.

For questions or additional information, please contact us at ESSASupport@tea.texas.gov.

Questions and responses are organized by the following topic areas:

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Topic 1 – Migratory Students

Q1: What is the definition of a “migratory child”?

A1: As defined by ESSA, Section 1309(3), a “migratory child” is a child or youth who made a qualifying move in the preceding 36 months—

- as a migratory agricultural worker or a migratory fisher; or
- with, or to join, a parent or spouse who is a migratory agricultural worker or a migratory fisher.

According to the [MEP Policy Guidance](#), Chapter II, A1, the migratory child is a child or youth:

- The child is not older than 21 years of age; and
- The child made a qualifying move in the preceding 36 months as a migratory agricultural worker or a migratory fisher, or did so with, or to join a parent/guardian or spouse who is a migratory agricultural worker or a migratory fisher; *and*

- With regard to the **qualifying move**, the child moved due to economic necessity from one residence to another residence, and—
 - From one school district to another; or
 - In a State that is comprised of a single school district, has moved from one administrative area to another within such district; *or*
 - Resides in a school district of more than 15,000 square miles and migrates a distance of 20 miles or more to a temporary residence.

Q2: What is the definition of a “migratory agricultural worker”?

A2: As defined by ESSA, Section 1309(2), a “migratory agricultural worker” is an individual who made a qualifying move in the preceding 36 months and, after doing so, engaged in new temporary or seasonal employment or personal subsistence in agriculture, which may be dairy work or the initial processing of raw agricultural products. If an individual did not engage in such new employment soon after a qualifying move, such an individual may be considered a migratory agricultural worker if the individual actively sought such new employment and has a recent history of moves for temporary or seasonal agricultural employment.

Q3: What is the definition of a “migratory fisher”?

A3: As defined by ESSA, Section 1309(4), a “migratory fisher” is an individual who made a qualifying move in the preceding 36 months and, after doing so, engaged in new temporary or seasonal employment or personal subsistence in fishing. If the individual did not engage in such new employment soon after the move, the individual may be considered a migratory fisher if the individual actively sought such new employment and has a recent history of moves for temporary or seasonal fishing employment.

Q4: What is the definition of a “qualifying move”?

A4: As defined by ESSA, Section 1309(5), a “qualifying move” is a move due to economic necessity—

- from one residence to another residence; and
- from one school district to another school district,

except— (i) in the case of a State that is comprised of a single school district, wherein a qualifying move is from one administrative area to another within such district; or (ii) in the case of a school district of more than 15,000 square miles, wherein a qualifying move is a distance of 20 miles or more to a temporary residence.

[MEP Policy Guidance](#), Chapter II, C3, states that, “qualifying work” is shorthand for temporary or seasonal employment or personal subsistence in agriculture or fishing. Under 34 C.F.R. § 200.81(n), “qualifying work” means temporary employment or seasonal employment or personal subsistence in agriculture or fishing.

Topic 2 – Identification & Recruitment

Q1: Under *Relationship to child or children* are we currently required to put a dash or are we allowed to type the relationship to the child even though we are conducting the interviews via phone?

A1: Recruiters should put the relationship between the interviewee and the child/children on Section F of the COE and provide the following comment on the COE SDF **“The interviewee [insert Full Name and relations to the child(ren)] verified by phone interview the eligibility information on [insert date XX/XX/XX].”**

Q2: Can you provide clarification on using the ECOEs for families with new economic necessity moves and previous qualifying work eligibility?

***A2:** A new Electronic Certificate of Eligibility (COE) is required for every new move, even if the qualifying activity was recorded on a previous COE.

***Q3:** If a user has no ECOE access or is having issues accessing the ECOE, how should they proceed?

A3: The ECOE is the preferred method for capturing MEP eligibility data. However, if special circumstances prevent the use of the ECOE, the paper version is allowed. These guidelines are outlined in the most current *Texas Manual for the Identification and Recruitment of Migratory Children*. Once the paper COE has been completed, the data can be entered into the TX-NGS system.

Q4: Considering the shared USDE letter (Fact Sheet) regarding remote recruitment that mentions travel distance, I wanted to ask about the upcoming residency verification. Will we be allowed similar flexibility to make phone calls?

A4: It is recommended that MEP staff verify residency through face-to-face contact with migratory families or through school enrollment records. However, we recognize that such methods are not always feasible or practical. Therefore, telephone calls and text messages are acceptable alternatives provided the MEP staff asks the necessary questions to verify the migratory child/children’s residency in the district. It is the expectation that communications via text be documented in the same way as telephone calls or face-to-face communications.

Topic 3 – Coordination and Collaboration

Q1: Is coordination with other state, federal, and state programs a requirement?

A1: Sections 1304(b) and 1306(a) of the statute require SEAs to identify and address the special educational needs of migrant children by providing them a full range of services from appropriate

local, State, and Federal educational programs. In providing these services, SEAs must plan jointly with local, State, and Federal programs and must integrate the MEP with services provided by other programs. Furthermore, Section 1304 (b)(1)(B) mentions joint planning among local, State, and federal educational programs serving migratory children, including language instruction educational programs under Part A of Title III.

Q2: Are there any guidance documents that newbies can be referred to with best practices for collaboration with other programs?

A2: The Assisting Interstate/Intrastate Mobile Students (AIIMS) web portal at [AIIMS Explore by Topic Page](#) serves as a guidebook for MEP Staff. It will continue to be updated to reflect best practices on coordination/collaboration.

Topic 4 – Serving Migratory Students

Q1: Must an LEA serve an eligible migratory child who attends a private school?

A1: Yes. Section 8501(b) of the statute requires SEAs 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. ([MEP Policy Guidance](#), Chapter V, H1)

A school system receiving assistance under Title I, Part C, must provide eligible private nonprofit school children and their teachers or other educational personnel, with equitable services or other benefits under this program. Before an LEA makes any decision that affects the opportunity of eligible private nonprofit school children, teachers, or other educational personnel to participate, the LEA must engage in timely and meaningful consultation with private school officials and maintain written documentation of such efforts. (**ESSA Program-Specific Provisions and Assurances**)

Q2: If a district's data show that reading is a need for migratory students, may the district expend funds on a supplemental reading program with pre- and post-assessments in lieu of Project SMART? The reading program would be a service offered only to migratory students and meet SDP Goal 1-1? Although Project SMART does have literacy embedded, it does not measure reading growth or support targeted reading instructional strategies.

A2: Yes. The district can choose to provide supplemental reading instruction in the summer.

Q3: Do districts have to offer Project Smart?

A3: Project SMART is the summer curriculum to be used when providing supplemental mathematics

instruction to migratory children in grades K-8. If there is no need for it in the school system because the migratory students are utilizing other summer services, then the district does not have to provide it.

Q4: Do Project SMART instructors need to be certified teachers?

A4. It is up to the school system.

Q5: Are districts able to use Title I funds to pay teachers to implement the Project SMART Curriculum for Migratory students?

A5: That is a school system decision. MEP funds are supplemental.

Q6: How will virtual instructors collect pre- and post-assessment Project SMART data?

A6: Use the appropriate Project SMART Virtual Assessment Data Collection flow chart ([K-1](#) or [Gr 2-8](#)) to determine whether to submit the assessment data or not. If data is submitted, the appropriate Project SMART Virtual Assessment Data Collection (PS-VADC) Checklist should be completed for each student and kept on file by district MEP staff as documentation.

Q7: For Project SMART, should students' pre-assessment scores be entered in TX-NGS if they are unable to complete the post-assessment?

A7. Yes, students' pre-assessment scores should be entered, and post-assessment scores can be left blank.

Q8: For Project SMART, if a student is testing virtually and the pre-assessment meets the criteria for submitting the score, but the post-assessment does not meet the criteria for submission, should the pre-assessment score be entered in TX-NGS?

A8. Yes, the student's pre-assessment score should be entered, and the post-assessment score should be left blank.

Q9: Can Project SMART be used during school intersessions to provide supplemental math support?

A9: Yes, the Project SMART curriculum from the previous summer can be used during intersessions for this purpose. Refer to the [Project SMART Flexible Delivery Options Document](#) for additional information.

Q10: What is the best way to serve migratory students who do not want to attend school due to moving so much?

A10: The first step should be to encourage the child to enroll in school; then, utilize the school resources to meet their academic needs and work with existing dropout prevention programs in the school system. In addition, school systems should reach out to their respective ESCs for guidance on strategies for working with the migratory Out-of-School Youth (OSY).

*Q11: Is a migrant student exempt from taking the STAAR test if they leave during a six weeks period and finish the credit at an out of state school? The student was present and had a grade during the 1st-5th six weeks in Texas?

A11: The FAQs posted at [Texas Assessment Program FAQs](#). The [STAAR Graduation Requirements FAQs](#) state the following:

What are the STAAR graduation requirements for a student who moves into a Texas public high school from out of state or country or from a private school?

A student whose high school credit has been earned out of state or country or from a private school for a course in which there is a corresponding STAAR EOC assessment

- is not required to take the corresponding STAAR EOC assessment to fulfill his or her graduation requirement if the Texas school district accepts the course credit from the school in which the course was taken, or
- is required to take the corresponding STAAR EOC assessment to fulfill his or her graduation requirement when they take the corresponding course if the Texas school district does not accept the course credit.

Topic 5 – Texas New Generation System/Migrant Student Information Exchange (TX-NGS/MSIX)

Q1: What is the recommended ratio of TX-NGS staff?

A1: State recommendations regarding TX-NGS personnel are as follows: **one TX-NGS Data Specialist for every 300 migratory students**, prorating the number of positions depending on the school system's migratory enrollment.

Q2: Many times, Title I, Part C staff directly work and coordinate within the school system for a migratory child to receive services, such as getting tested for special education, tutoring through other funding sources, including the child's classroom teacher, etc. If the child obtains such services, should this be encoded as a referral on TX-NGS?

A2: If the migratory child has received the services, regardless of MEP-funded personnel efforts, it cannot be counted as a referred service. Referred services cannot be MEP-funded and they cannot be school or district-based services that the child is already entitled to receive (e.g., Title I Part A services, Title III services). Referred services are educational or educationally-related (supportive) services that migratory children would not have received without the efforts of MEP-funded personnel. The child must actually receive the service in order for it to be counted as a referral.

Q3: Which TX-NGS reports list the Family ID?

A3: There are three (3) reports that show the Family ID:

- the Continuing Enrollment Residency Worksheet,
- the Migrant Continuing Residency Report, and
- the COE Family Report.

Q4: Is it a requirement to enter grades for a 12th grader who is graduating in the current school year?

*A4: No, it is not necessary to input the final semester spring grades for students who graduate. Although, for accurate reporting, data specialists must ensure all credits earned before the final semester are entered. In addition, the graduation termination code and the graduation date must be entered into the system for all students who graduate.

*Q5: Do we need to enter an MSIX Move Notice every single time a migratory student move? Even if the student moves from one school system to another school system within the same region?

A5: Yes. Please enter an MSIX Move Notice each time a student moves from one area to another area whether that move occurs within your region, the State, or Out-of-State. Additional guidance regarding MSIX can be found in the [Texas Migrant Resource Portal](#) (TMEP) and in the TX-NGS/MSIX Manual or by contacting the Texas Migrant Interstate Program at tmip@esc20.net or 1-833-454-6711.

Topic 6 – Early Childhood Education

Q1: Can “A Bright Beginning” (ABB) be implemented virtually?

*A1: Virtual implementation of ABB is allowed. However, due to the many challenges associated with instructing young children virtually, in-person instruction is highly encouraged.

Q2: I just want to verify the accuracy, especially the information on how MEP students are coded as Eco Dis, and also the information regarding coding of early childhood (i.e. Bright Beginnings Home-based).

A2: Migratory students ages 3-21 who are enrolled in school in campus-based programs but have not yet received a high school diploma are coded with a MIGRANT-INDICATOR-CODE (E0984) of 1. Migratory students ages three and four, who are enrolled in home-based early childhood programs, should be coded as “enrolled, but not in membership (ADA-ELIGIBILITY-CODE 0)”. Migratory three- and four-year-olds served in a campus-based program funded wholly or in part by Title I, Part C funds should be coded with grade-level PK. Migratory three-and-four-year-olds served in a home-based early childhood program funded wholly or in part by Title I, Part C (Migrant) funds and should be coded with grade-level EE. Migratory students with a certificate of eligibility (COE) are coded with

an ECONOMIC-DISADVANTAGE-CODE (E0785) of 99. A copy of the current COE should be provided to the PEIMS contact.

Q3: If a 3-year-old receiving speech services has a COE on file with the district, does the child need to be coded as a migratory student in PEIMS?

A3: TEA data standards say the following: “The student does not have to actually receive MEP-funded services in order to be coded as a participant in the program (code 1). The student simply has to be eligible under the federal legal definition of an eligible migratory child. To be eligible under the federal definitions listed above, the child must have a current COE on file at the district or regional education service center completed and signed by an individual trained by the Texas Migratory Education Program (MEP).”

Q4: We are encoding our home-based ‘A Bright Beginning’ students into TX-NGS as mandated, and we are providing our SSA districts’ PEIMS contacts with both the copy of the COE and the Unique Student Count Report. The PEIMS contacts are then asking us for birth certificates, social security numbers, and various other paperwork to which we do not have access.

Can PEIMS contacts not enroll ABB home-based students as denoted above or is additional paperwork required?

A4: The [Student Attendance Accounting Handbook](#) deals with the documents that are required to enroll a student. In section 3.3 it goes through in detail what a district will need to register a student. Section 3.3.3 speaks to the documentation of identity and age and gives various items that can be used for enrollment. A Social Security card is not required, as the school system can create a state ID for the student.

Q5: If a parent does not want to send their child to the available district prekindergarten program, can they be served with the A Bright Beginning program?

A5: Yes, but explain to the parent the benefits of accessing the district prekindergarten program. Ensure that they understand this is a free, available option that would provide guidance and daily, effective, and engaging learning opportunities for their child. If the parent provides justification for the decision not to access the available pre-K program, ABB could be provided as a supplemental option.

Q6: Can MEP-funded staff in Project Districts offer ABB to a student at an alternative location such as UMOS-Center-based? If yes, would it be considered ABB Center-based or Home-based and MEP-funded, Non-MEP-funded, or both?

A6: This is a great example of coordinated services. It is up to the LEA to determine where they will provide the services. Based on the information you provided, we have the following guidance for you:

- Since the MEP staff is providing the service, it is considered MEP-funded.

- It can be ABB center-based since it is not at the children's home.

* In addition, for coding on TX-NGS, the district's ABB SSID should be listed, and then under the "Supplemental Services", the data specialist will indicate center-based.

*Q7: We have a migrant student coming in from another state. The parent brought proof that the child completed pre-kindergarten in their previous state of residence. However, because of her age and date of birth, it is recommended that she enrolls in pre-kindergarten again, not kindergarten. The parents are concerned with this decision and unenrolled the student from our district for now. The principal of the campus reached out to us asking for some support and/or guidance regarding this situation. The district is afraid that the enrolling of the child to kindergarten may cause a red flag. Is there any guidance regarding this issue that may help the child enroll in kindergarten. High school students that complete credits outside the State of Texas are granted those credits and are even exempt from an EOC exam if the student does not have a previous attempt. For example, if the student completes Algebra 1 in another state, the student does not have to take the EOC and is granted the credit. Is there anything like this for early childhood education?

A7. This would be a local district decision. A student younger than five years of age is entitled to the benefits of the Foundation School Program if: (1) the student performs satisfactorily on the assessment instrument administered under TEC Section 39.023(a) to students in the third grade; and (2) the district has adopted a policy for admitting students younger than five years of age. TEC§48.003(d) [Early Childhood Education FAQs](#) and [Texas Public Law Section 48.003](#). Additionally, the [Student Attendance Accounting Handbook](#) also provides this example.

3.11.4 Example 4: Your school district decides to serve a four-year-old student in a kindergarten classroom. Examples of reasons a district may choose to do this could include: the student previously completing pre-K in another state; beginning but not completing kindergarten in another state; completing private kindergarten in Texas; or an individualized assessment of the appropriate placement for the student. Since the student was not five years old on September 1 of the current school year, the student is not eligible for kindergarten. If the student is enrolled in kindergarten, the ADA eligibility code is 4 - Ineligible Full-Day or 5 - Ineligible Half-Day, depending on if your district operates a full-day or a half-day kindergarten program.

If this student, who was four years old on September 1 of the current school year, qualifies for pre-K, then the ADA eligibility code is 2 - Eligible for Half-Day Attendance. As long as the student qualifies for pre-K (see 7.2 Eligibility), the student is eligible for enrollment in pre-K and for pre-K funding even if the district serves the student in a kindergarten classroom.

Topic 7 – Parent and Family Engagement

Q1: What is the function of a Parent Advisory Council (PAC)?

A1: A PAC advises the school system on concerns of migratory parents that relate to the planning, operation, and evaluation of Title I, Part C programs and projects in which their children participate. (**MEP Policy Guidance** Chapter VII, B2)

Q2: Who is eligible to be a member of a PAC?

A2: Parents or guardians of eligible migratory children and individuals who represent the interests of such parents are eligible to serve as PAC members. ([MEP Policy Guidance](#), Chapter VII, B5)

Q3: May MEP-funds be used to support parents' attendance at workshops and conferences?

A3: Yes, the Local Education Agency may use MEP funds for costs that are reasonable and necessary to support the attendance of migratory parents at workshops and conferences that enable them to participate more effectively in the local program or to conduct home-based activities. The LEA should develop criteria, in consultation with parents, to determine the reasonable number of parents who may attend national meetings. Upon return, attendees should provide information, and, if possible, training on the conference topics to other parents. ([MEP Policy Guidance](#), Chapter VII, C5)

Q4: Can the district combine its PAC meeting with other parent meetings, such as logging in to see their child's grades, STAAR reading and Math information, and health information? Should they keep them separate, or is it okay to combine them? If a district is holding meetings and giving training to our parents on how to log on to your child's grades and how to set alerts to text you when your child is failing, or if they plan on giving some kind of computer training for the migratory parents, can this count on Fidelity of Strategy Implementation (FSI) for parent trainings?

A4: First of all, we want to ensure that the district is meeting the requirement in ESSA, Section 1304(c)(3), which states that in planning and operation of programs and projects, both the State and LEA-level agency are to consult with the parents of migratory children, including Parent Advisory Council (PAC). If the question is "Can the Migratory PAC Meeting set for migratory parents include academic topics overviews as part of the agenda," then the answer is yes, if it is part of seeking consultation for program implementation and evaluation. If the purpose is to just provide information and training to the migratory parents, the LEA could set up time for just training and then have the PAC meeting following that training. LEA must ensure that migratory parents have sufficient stand-alone time, separate from that devoted to other general topics to discuss MEP-specific issues. This should be reflected in the PAC agenda and minutes.

In response to the question about parent trainings to be reflected in the FSI, these trainings could be included if it is addressing the Measurable Program Outcome (MPO).

Q5: May MEP funds be used to provide refreshments or food during a PAC meeting or training?

A5: According to the [MEP Policy Guidance](#), Chapter VII, C7, "Reasonable expenditures for refreshments

or food, particularly when such meetings extend through mealtime, are allowable.” (Also, refer to Q71 of Legislation MEP.)

Q6: Can a PAC meeting be conducted virtually?

*A6: Yes, PAC meetings may be conducted virtually. Districts have the flexibility to hold Parent Advisory Council meetings in an online format, provided that all requirements for meaningful consultation, parent involvement, and documentation—such as agenda and minutes—are met. This allows greater access for migratory parents who may have limited availability to attend in person. The LEA should ensure that parents have access to the needed technology and support throughout the process.

Q7: Is sharing the budget a requirement for PAC meetings?

A7: Sharing the budget is not a requirement. What is required is that the program obtains meaningful consultation from the parents. Discussing the budget can be used as a way to help parents understand the resources the district has to help migratory students, but just remember that any discussion has to lead back to meaningful consultation.

Topic 8 – Priority for Service (PFS)

Q1: Does the PFS Action Plan need its “own section” in the District Improvement Plan (DIP)? What if a district addresses migratory population students/parents within a specific main district goal, but there is not a specific goal/section just for migratory students? Can they include their PFS Action Plan and ID&R Plan as addenda in their DIP?

A1: Yes, the PFS Action Plan needs its own section in the DIP. According to the ESSA Consolidated Federal Grant Application Program Guidelines and the Program Specific Provisions and Assurance, in *providing services with Title I, Part C, funds, LEAs shall give priority to serving Priority for Service (PFS) migratory children with MEP funds before using Title I, Part C funds to address the needs of other migratory children. PFS students are defined as migratory children who have made a qualifying move within the previous 1-year period and (1) who are failing or most at risk of failing to meet the state’s academic standards; or (2) have dropped out of school. [Section 1304(d)] The LEA or fiscal agent will develop a Priority for Service Action Plan for serving PFS students. The LEA or fiscal agent will include the PFS Action Plan as a separate section labeled or identified (e.g., “MEP PFS Action Plan”) in the District Improvement Plan.*

Q2: Are other ESCs encountering a major decline in their PFS numbers?

A2: Priority-for-Service numbers are fluctuating across the state. It is important to review the PFS

Report, identify the reason for the PFS flag, and address the needs.

Q3: Do we need to focus on the priority-for-service (PFS) students when providing MEP services since our Title I, Part C funds have drastically decreased?

A3: The needs of PFS students should always be considered first.

Topic 9 – MEP Funding and Use of Funds

Q1: How does the state determine the amount of Title I, Part C Allocations?

A1: In determining the amounts for Title I, Part C allocations, the state considers the following:

- Number of migratory children based on TX-NGS;
- TX-NGS Priority for Service (PFS) classification counts;
- TX-NGS Number and Needs indicator counts; and
- LEA's availability of Other Sources of Funding (OSF).

Refer to the [ESSA Funding Reference Manual](#) for the specific funding formula.

Q2: Where do I get information on entitlements?

A2: Refer to the [Federal Entitlements-Grant Allocations](#) web page.

Q3: Can Title I, Part C funds be used in place of other funds?

A3: The LEA shall use funds received under the Title I, Part C, program to supplement, and to the extent practical, increase the level of funds that would, in the absence of federal funds be made available from nonfederal sources for the education of students participating in programs and projects assisted under Title I. In no case may these funds be used to supplant funds from nonfederal sources.

Refer to the most recent [Program-Specific Provisions and Assurances](#) found in the Grants Opportunities Page.

Q4: Is there a limit to how much an LEA can carry over from one fiscal year to another?

A4: There is no limit to how much a school system can carry over from one fiscal year to the next. However, the LEA should ensure the needs of the migratory children are addressed.

Q5: Should the State examine the amount of MEP funds that local operating agencies carry over from one fiscal year to the next? ([MEP Policy Guidance](#), Chapter I, D5)

A5: SEAs should examine how much money local operating agencies carry over to determine whether

to reallocate funds that remain unobligated at the end of the fiscal year. If a local operating agency has a significant amount of carryover, the SEA might choose to adjust the local operating agency's subgrant downward to make available the funds that the local operating agency did not spend in the prior year. This allows the SEA to reallocate unobligated MEP funds for new uses in the subsequent fiscal year.

Q6: What are the guidelines for LEAs that decide not to receive Title I Part C funds?

*A6: There are no guidelines for school systems that are eligible for MEP but elect not to apply. [However, non-project districts should work with their regional ESC to make active identification and recruitment possible within the district boundaries. Additionally, the school system should collaborate in providing the necessary migratory student data.](#)

Q7: Will an LEA's MEP funding be affected if it provides services through collaboration that will be entered as non-MEP funded?

A7: Services provided through collaboration that are entered as non-MEP-funded supplemental services do not affect the school system's MEP funding.

Q8: May Title I, Part C funds be used to purchase t-shirts to be worn by Identification and Recruitment (ID&R) staff during their field work? Legislation MEP Q&As, Q89)

A8: MEP funds may be used to pay for the cost of t-shirts for ID&R staff, provided the MEP abides by the criteria that all State and local education agencies (LEAs) must consider in determining whether a particular cost is an allowable use of funds:

1. It must comport 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. It must meet 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; and
5. The costs 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.

Q10: Can MEP funds be used to pay for hotspots?

A10: The purchase of electronic devices with MEP funds is allowable if the LEA has not provided devices for all other students, and MEP staff have identified the need for a child to participate in the program. The LEA may provide devices for students/parents to check-out to participate in MEP-funded services and may provide access to the internet (via a hub that is checked out). However, MEP staff should ensure that:

- a) The devices can be purchased, received, and delivered to the students in time for the program to be implemented;
- b) Students/parents are taught how to use the devices; and
- c) Students are provided training on internet safety.

Q11: If we can document that parents are in need of food and the district does not provide a pantry, can we provide non-perishable items for them?

A11: LEAs must continue to ensure that eligible migratory children are provided services from other available Federal, State, and local programs for which they are eligible. (See ESEA section 1306(b)(2)). For example, food for eligible migratory children should generally be provided by other Federal and non-Federal programs (e.g., school meals programs administered by the United States Department of Agriculture (USDA) Food and Nutrition Service, and community food banks). During an emergency, if food is not immediately available from other programs, the MEP may provide food to meet the identified needs of migratory children for a limited period, until other resources become available.

Q12: Can graduation gowns be purchased with Title I, Part C funds?

A12: This is allowable if the school system has exhausted all possible sources (programs) that could provide the caps and gowns. The school system must document its efforts to secure that service with other funds and ensure it is an identified need. If there are no other available sources to provide these items, they may be purchased with MEP funds, loaned to migratory students, and returned to the LEA. The LEA should establish a process to determine such need, including the lending process.

Q13: Can recognition awards be purchased with MEP for MEP students?

A13: Awards are not allowed to be purchased with MEP funds. The school system may reach out to other programs or community agencies for the donation of such items.

Q14: Can food be purchased to encourage parents to attend meetings?

A14: Chapter VII, Question C7 of the MEP Non-Regulatory Guidance (NRG) states that reasonable expenditures for refreshments or food provided during parent meetings or training are allowable,

particularly when such meetings extend through mealtime. However, it does not distinguish between snacks and a meal. This can be an allowable cost if there is a connection to a programmatic purpose and the cost is reasonable and necessary.

Refer to [EDGAR Material and Resources](#).

Q15: If an employee is split funded through Title I, Part A & Title I, Part C, would this individual be able to assist as a state testing monitor for a secondary campus that is not Title I?

A15: Title I, Part C

Title I, Part C funds may only be used to meet the unique educational needs of migratory students. They cannot be used for activities for non-migratory students. Unless they are only going to assist with State testing monitoring of migratory children, this is not allowable as part of the TIC time for this employee.

Title I, Part A

Title I, Part A funds may only be used to meet the intent and purpose of the Title I, Part A program. Thus, it would be unallowable for Title I, Part A funded personnel to be providing services at non-Title I, Part A served campuses.

Q16: If an LEA is part of an SSA with an ESC, do they still get carryover as if it had applied for the funds directly on our own?

A16: The carryover funds go to the fiscal agent, in this case the ESC.

Topic 10 – Other

Q1: Are school districts required to print out the Family Survey for all students in the district even though they answer no to all questions?

A1: According to the latest Manual for Identification and Recruitment for Migratory Children, *If a family survey is being used, the returned surveys should be examined for the following:*

- *Is there an adequate number of returned surveys (at least 90 percent of all families)?*
- *Which surveys have “yes” answers, indicating prospective migratory families?*
- *Surveys with “yes” answers will require follow-up to determine if a family is eligible for the MEP.*
- *Contact with potentially eligible migratory families should be done by August 31 or as soon as possible.*

The ESCs and LEAs may work collaboratively to determine the best way to collect that information.

Q2: What are acceptable forms of documentation for sign-in sheets?

A2: Given the increased use of virtual meeting environments, participant rosters that include the meeting title, meeting date, and stakeholder names and roles would be acceptable substitutes for the more traditional sign-in sheets. This eliminates the need of a participant's signature.

Q3: What is the process or is there a process to dispose of obsolete technology bought with MEP funds years ago?

A3: The information requested on the question can be found in the following link:
There is a form called **Inventory Disposition**.

Q4: Is there one location where all the MEP documents can be found?

A4: MEP resources can be found on TEA's [Title I, Part C](#) webpage and additional documents can be found in the [Texas Migrant Resource Portal](#) (TMEP).

Q5: What is the deadline for completing the comprehensive needs assessment (CNA)?

A5: The **State** Comprehensive Needs Assessment (CNA) is completed every three years; however, the **Local Needs Assessment (LNA)** is to be conducted annually by school systems to identify the unique needs of migratory students in their area and plan accordingly. There is no assigned deadline for completing the LNA. It is recommended that it be done in the Spring when planning activities for the following school year, before completing the ESSA Consolidated Federal Grant Application.

Q5: How long are paper COEs supposed to be kept?

A5: The Texas Manual for Identification and Recruitment of Migratory Children states that *an inactive COE file must be kept for children identified in previous years and retained for seven (7) years from last QAD. For termination due to graduation, obtaining a Certificate of High School Equivalency, death of child or a parent/guardian request, the records (e.g., copy of COE, copy of COE SDF, documentation of termination) will be treated as inactive, and kept for seven (7) years from last QAD. In addition, also stated, the only exception to the above timelines involves old COEs are being reviewed because of an ongoing investigation or audit.* COEs that are material to an investigation or audit should not be destroyed until the investigation or audit has been closed.

It is important to note that, while paper COEs must be retained according to regulatory guidelines, the preferred method for recruitment is now the use of the electronic Certificate of Eligibility (eCOE). The eCOE streamlines the identification and recruitment process, enhances data accuracy, and supports more timely reporting. LEAs are required to utilize the eCOE system whenever possible to ensure compliance and operational efficiency.