Migrant Education Program (MEP) Frequently Asked Questions During the COVID – 19 Crisis

On March 12, 2020, Governor Mike DeWine made an unprecedented announcement ordering all of Ohio's public, community and private K-12 school buildings to be closed to students due to the ongoing coronavirus health crisis.

This frequently asked questions (FAQ) document is intended to help school and district leaders think through important local-level decisions in regards to serving migrant students and use of Title I-C Migrant Education Program (MEP) funds.

Use of Funds

1. **Can I use Title I-C MEP funds to provide tools for online instruction?**

   Yes, if the district does not supply tools for all students, Title I-C MEP funds can be used to provide tools for distance learning (e.g. hotspots, devices). The cost must be "necessary and reasonable" as required by federal regulation. Title I-C MEP fund purchased items must not supplant and must be maintained in a Title I-C MEP inventory.

2. **Can I use Title I-C MEP funds to provide tools for a migrant staff person to work from home and provide online services and support?**

   Yes, as long as it is for MEP related work. Technology costs must be reasonable and included in a Title I-C MEP inventory.

3. **Can federal funds pay for staff salaries and benefits while schools are closed?**

   Yes, if state and local funds are used for the same purpose, federal funds may also be used. Click here for Fact Sheet: Select Questions Related to Use of Department of Education Grant Funds During COVID-19.

4. **Will funding be available for migrant summer programs this summer?**

   Yes, summer funding for 2020 will be available in CCIP by mid-June.

5. **If we do not expend all of our Title I-C MEP funds in SY 2019-2020, will we be able to carryover funds?**

   Yes. Carryover is allowed for Title I-C MEP funds (funds expire after 27 months).

6. If we can't hold summer school this year, would it affect our funding for next year?

Yes, if students don't receive summer services it could affect funding for the state's federal allocation. However, there are other options for providing summer services to children outside of traditional site-based summer school.

7. Is it an allowable use of Title I-C MEP funds to provide food for eligible migratory families to meet their nutritional needs?

State educational agencies (SEAs) must continue to ensure that eligible migratory children are provided services from other available Federal, State, and local programs for which they are eligible (ESEA section 1306(b)(2)). 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, community food banks). USDA has implemented automatic flexibilities and expanded waivers specifically to address the pandemic— see https://www.fns.usda.gov/disaster/pandemic/covid-19 for additional information. During this emergency, if food is not immediately available from other programs, the MEP may be used to provide food to meet the identified needs of migratory children for a *limited period*, until other resources become available. We recommend that MEP staff document any efforts to obtain food from other sources prior to using MEP funds. As with any use of MEP funds, the costs must comport with the principles outlined in the Uniform Guidance in 2 CFR Part 200 (e.g., the costs are necessary, reasonable, and allocable to the MEP). The provision of food must also be consistent with the program purposes in ESEA section 1301 (e.g., 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.). Always remember that MEP funds must be used to supplement, rather than supplant, the use of non-federal funds.

During these extraordinary circumstances, States may take a similar approach to ensuring eligible migratory children are able to access other necessities when there is a delay or lack of availability from other sources. The provision of such necessities must be consistent with the program purposes in ESEA section 1301 (e.g., 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.)

Identification and Recruitment

1. Are future MEP regional meetings or trainings cancelled?

In general, meetings are not cancelled. Meetings can be conducted virtually whenever possible. Invitations links will be sent to participants approximately three weeks prior to the event.

2. Should recruiters continue to identify potentially eligible families?

Yes, recruiters must continue identifying and researching potential leads in their assigned areas during the COVID-19 response effort. Regional Coordinators must work with recruitment staff to develop a comprehensive plan to reach all identified leads once the restrictions are lifted. The vital work to identify potential families must be the focus of all recruitment staff.

3. Can recruiters meet in-person with potentially eligible families?

No, recruiters may NOT meet in-person with eligible families during the COVID-19 response effort.

- Recruiters must follow restrictions put in place by their employer.
- Recruiters may not conduct any in-person recruitment in counties under stay-at-home order.
- Recruiters may not conduct recruitment efforts in communities under a local stay-at-home order.
- Recruiters may not conduct school-based recruitment in areas where school buildings are closed due to the COVID-19 response effort but may conduct community-based recruitment if no other restrictions apply.

4. Can recruiters make in-person visits with local agencies and organizations?

No, recruiters must refrain from making in-person visits during the COVID-19 response effort. All communication must be conducted via an electronic platform or telephone.

5. Should recruiters visit family homes and/or places of employment to secure eligibility information and secure signatures on required documents?

No. Recruiters must complete the Certificate of Eligibility (COE) using alternative means of communication. We further recommend that a note be added to the Comments section of the COE to explain the circumstances that prevented the

recruiter/interviewer from obtaining the interviewee's signature. After normal activities resume, if MEP staff are able to contact the interviewee in-person, we recommend that the individual's signature be added to the COE and the Comments section be updated. Signatures may also be collected by mail.

6. Do completed Certificates of Eligibility have to go through the entire quality control process?

Yes. All Certificates of Eligibility must continue to go through the rigorous Quality Control process and be processed within the required timeframe. Certificate of Eligibility Quality Control can be conducted virtually.

Student Support and Instruction Plan

1. How will Local /Regional Directors' monthly meetings be conducted?

The remaining local meetings will be conducted virtually and agendas will be sent ahead of the meeting.

2. Should we continue after school programs?

In-person after school services may not be provided during COVID-19 response efforts. However, program staff is encouraged to explore ways to engage students and families virtually.

3. Should we continue planning our migrant summer programs?

Yes, summer services are critically important to students. We understand that planning may be difficult while schools are closed due to COVID-19 response efforts. Care must be taken while conducting summer registrations of students to minimize the risk to the staff. We will provide additional information and guidance as the time draws closer. In the meantime, migrant sites should be planning for it.

4. Can programs provide services virtually?

Yes, programs may conduct services virtually, provided that the family has the ability to access such services (e.g., Internet access, electronic device, etc.). Please continue to serve Priority for Service (PFS) students first.

5. How do we know which families can receive services virtually?

Each LEA should contact families via phone to ask about their well-being, whether they are receiving schoolwork from their schools, and whether they have access to the Internet. If they do not have Internet or Wi-Fi access, help connect the family to low or no-cost options, as available.

6. How do we document services?

Programs should continue using the same paperwork and data entry procedures already provided through Google Drive and Webdirect to document MEP services. Remember, services may be provided virtually.

7. Can I use MEP funds to offer secondary credit recovery services to migrant high school students?

Yes. You may begin offering secondary credit recovery services immediately for students needing to make up high school coursework using a variety of online resources including Odysseyware.

8. Can I work with my recruiter to get distance learning devices (iPads, laptops, Chromebooks) in the hands of migrant students?

Yes, recruiters may assist the LEA in the coordination and distribution of technology equipment for the purpose of helping migrant students set up for distance learning. However, it is vital that recruiters follow restrictions put in place by their employer during the COVID-19 response effort.

9. Can I provide summer MEP services through distance learning to my P3-P5 migrant student population if we are not permitted to operate a traditional site-based summer school?

Yes. Based on Ohio's Measurable Performance Outcome (MPO) 7.1 of the Title I - Part C, Service Delivery Plan (SDP):

- The percentage of migrant children ages 3 to 5 participating in the summer MEP will increase by five percentage points by the end of PP20.

It is important that we continue providing services to our preschool migrant population during the COVID-19 crisis. We strongly encourage you to work with your PreK educators to think of creative ways to deliver summer services to this age group.