

Parent and Family Engagement Guidance

Title I, Part C: Education of Migratory Children

Excerpted from Pages 78-83 of the Non-Regulatory Guidance for the Title I, Part C Education of Migratory Children, updated March 2017

Excerpted from U.S. Department of Education – Office of Migrant Education Quarterly MEP Q&A’s

Statutory Requirements

Title I, Part C, Sections 1304(c)(3) and 1306(a)(1)(B)(ii)

Title I, Part A, Section 1116

Regulatory Requirements

34 CFR 200.83(b)

Are districts required to consult with parents in planning the MEP?

Yes. Pursuant to section 1304(c)(3), States and districts must consult with parent advisory councils in planning and operating the MEP if they operate programs of one school year in duration. The statute also requires the MEP provide for the same parent and family engagement as is required in section 1116, unless extraordinary circumstances make such provision impractical. This provision requires districts to engage parents, in an organized, ongoing, and timely way, in the planning, review, and improvement of the MEP.

Why is parental consultation in planning the MEP important at the State and local level?

As the first teachers of their children, parents know the needs of their children best and can provide insight into their children’s strengths and weaknesses. As such, migrant parents can play a pivotal role in planning the educational programs and projects in which their children participate. Engaging migrant parents in planning the MEP also builds their capacity to assist in their children’s learning at home. In addition, parental engagement in the planning of the program enables parents to understand the program and have informed conversations with MEP and school staff regarding their children’s education. Through their participation in the planning process, migrant parents are also more likely to become advocates and supporters of the program because they have a personal stake in its success.

What does the statute require regarding parent and family engagement?

Section 1304(c)(3)(A) requires the State and district to conduct parent and family engagement activities in a manner that provides for the same parent and family engagement as is required for programs and projects under section 1116, unless extraordinary circumstances make such provision impractical. The statute also requires parent and family engagement activities to be conducted in a format and language understandable to parents.

What does section 1116 require?

In general, section 1116 requires:

- A written parent and family engagement policy;
- Policy engagement of parents in an organized, ongoing, and timely way in the implementation of the MEP;
- Development of a school-parent compact in order to share the responsibility for high student academic achievement;
- Capacity building of parents and school staff for strong parent and family engagement; and
- Effective access to parent and family engagement activities.

May MEP funds be used to support parent and family engagement activities required by section 1116?

Yes. MEP funds may be used to pay the cost of parent and family engagement activities, such as: parent conferences; resource centers; training programs (including expenditures associated with attending such programs); reporting to parents on children's progress; hiring, training, and use of parent and family engagement liaison workers; training personnel, including pupil services personnel; providing school-to-home complementary curricula and materials in implementing home-based educational activities; providing timely information on the MEP and responses to parent recommendations; and soliciting parents' suggestions in the planning, development, and operation of MEP projects.

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

Yes. The State and district may use MEP funds for costs that are reasonable and necessary to support the attendance of migrant parents at workshops and conferences that enable them to participate more effectively in the local program or to conduct home-based educational activities. The State and districts 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 migrant parents.

May parents be paid a wage or stipend to attend parent and family engagement activities or meetings?

No. The statute does not authorize a district to pay wages to a parent to attend a meeting or training session, or to reimburse a parent for salary lost due to attendance at general parent and family engagement activities. Parent and family engagement expenditures are limited to actual expenses that a parent may incur.

May MEP funds be spent for food and refreshments provided during parent meetings or training?

Yes. Reasonable expenditures for refreshments or food, particularly when such meetings extend through mealtime, are allowable.

When may MEP funds be used to support activities for migrant parents?

MEP services are educational or educationally related activities (instructional or support services) 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 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.

Based on this definition, the U.S. Department of Education does not believe that parents who are not eligible for the program themselves, should be receiving **MEP services**. In other words, providing instructional or support services to parents using MEP funds does not *directly benefit a migrant child* nor do such services in and of themselves *enable the program to meet its measurable outcomes and contribute to the achievement of the State's performance targets*. However, there are certain **allowable activities** that a MEP may provide which are intended to assist parents in the education of their MEP-eligible children.

The statute specifies that MEP funds may be used for family literacy programs and parent and family engagement [see sections 1304(b)(6), 1304(c)(6)(C), and 1304(c)(3)(A) of the Elementary and Secondary Education Act (ESEA) of 1965, as amended by the Every Student Succeeds Act of 2015].

In considering whether a **family literacy program** may be an allowable use of MEP funds, districts should assess whether the program fits the statutory definition of family literacy services (see section 8101(24)).

The characteristics of such programs are as follows:

1. Provided to participants on a voluntary basis.
2. Are of sufficient intensity in terms of hours, and of sufficient duration, to make sustainable changes in a family, and that integrate all of the following activities:
 - Interactive literacy activities between parents and their children.
 - Training for parents regarding how to be the primary teacher for their children and full partners in the education of their children.
 - Parent literacy training that leads to economic self-sufficiency.
 - An age-appropriate education to prepare children for success in school and life experiences.

Please also note that section 1304(b)(6) of the ESEA places on each State an affirmative responsibility to encourage their districts to offer these family literacy services if the district serves a substantial number of migratory children who have parents who do not have a high school diploma or who have low levels of literacy.

Allowable uses of MEP funds for **parent and family engagement** are those activities described under section 1116 of the statute. Districts receiving MEP funds must carry out their programs in a manner that provides for the same parent and family engagement as is required for programs and projects under the section 1116 for Title I, Part A program (unless extraordinary circumstances make such provision impractical). Section 1116 includes activities that build parents' capacity for strong parent and family engagement -- i.e., those that ensure effective engagement of parents and supports their partnership with the school and community to improve student academic achievement. To this end, funds may be used to provide materials and training to help parents work with their children to improve their academic achievement.

Districts should use their discretion when determining the types and intensity of parent and family engagement activities and family literacy programs. While the U.S. Department of Education encourages states and districts to carry out these activities consistent with the intent of the statute, please keep in mind that the purpose of these activities is to ensure effective parent and family engagement for purposes of improving children's academic achievement and therefore, activities for parents should not overshadow services to eligible migrant children.

Also, keep in mind that when considering if and when MEP funds may be used to support particular activities, the State and 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.