

Title I, Part C - Migrant Education Program (MEP) Monitoring Tool

Title I, Part C (Title IC) Monitoring Process Overview

This document is a resource guide supporting the Oregon Department of Education's (ODE's) Title I-C monitoring process. The Title I-C monitoring focuses on quality and compliance with state and federal requirements for programming for migratory children and youth. The Every Student Succeeds Act (ESSA) requires ODE to monitor the implementation of Title I-C program requirements and the expenditure of federal funds by all sub-grantees requirements contained in the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance: 2 Code of Federal Regulations (CFR) Part 200), the Education Department General Administrative Requirements (EDGAR), the Elementary and Secondary Education Act of 1965 (ESEA), as amended by ESSA, and associated regulations. ODE's vision for monitoring is to help build school district and ESD awareness of the requirements associated with accepting federal funds, capacity to self-assess against the requirements of the grants, and understanding of how they can best utilize grant funding to improve services for migratory children and youth. Monitoring is an opportunity to identify technical assistance and support needs and leverage federal funds in support of better outcomes for all students. This tool is intended to support ODE's review of local policies and practices to support our students who are receiving Title I-C services.

Abbreviations:

• NRG Non-Regulatory Guidance: Title IC of ESEA

• ESD Education/Educational Service District

ESEA Elementary and Secondary Education Act

• ESSA Every Student Succeeds Act

• ID&R Identification and Recruitment

OSY Out-of-School Youth

• PAC Parent Advisory Council

• **PFS** Priority for Services

• SDP Service Delivery Plan

Review Structure and Expectations

The monitoring for Title IC may be conducted on-site or remotely, or a combination. The review includes multiple domains: (1) Financial Management and Crosscutting Requirements, (2) Program-specific Fiscal Requirements, and (3) Programmatic Requirements. Under each domain, there are a number of sections, outlined below. Title I-C monitoring reviews may be comprehensive or targeted (focused on a select number of sections/requirements). ODE staff will notify regional staff which of the domains and sections will be included in a scheduled review. ODE may choose to conduct a targeted review based on criteria such as known risk factors for the region, requirements prioritized for review in a given year, or the time constraints of consolidated monitoring. Finally, ODE may add to, or modify, the questions in these protocols as needed based on the region's responses to the self-assessment, ODE's review of supporting documentation, and/or the region's responses during interviews.



Title I, Part C Self- Assessment Instructions

WHAT is it? *The Title I, Part C – Migrant Education Program (MEP) Monitoring Self-Assessment* is a tool aligned to programmatic requirements designed to help districts examine their practices and implementation to ensure a consistent alignment with the fiscal, administrative, and other program requirements.

WHY do we need to fill it out? Regions being monitored complete the self-assessment to develop shared understanding of the current practices relative to Title 1, Part C requirements, noting strengths and identifying where technical assistance/support may be needed from ODE. However, the self-assessment is available for use by any region at any time for the process of program reflection.

WHO should complete it? Each region will decide the appropriate staff to involve, but participants should include those who have the most knowledge of/responsibility for the topics included. It is recommended to include fiscal staff as well as program staff.

HOW do we complete it? Regions rate their practice in each applicable category and provide written responses to the question prompts.

- 1. **EMERGING:** We need to develop or revise policies/practices.
- 2. **DEVELOPING:** We have policies/practices aligned to some of the elements but need additional support.
- 3. **PROFICIENT:** We have policies/practices aligned to all elements in this area.
- 4. **EXCEPTIONAL:** We are so aligned we could serve as a model.

WHEN is it completed? The self-assessment must be completed and submitted by January 15, 2025.

Title I, Part C Requested Documentation Instructions

WHY do we need to provide this evidence? Regions being monitored provide previous year evidence of their implementation and programmatic actions to develop shared understanding of the current practices relative to Title 1, Part C requirements, noting strengths and identifying where technical assistance/support may be needed from ODE.

HOW do we complete it? Regions submit the requested documentation via secure transfer through OneDrive.

WHEN is it completed? The requested document must be completed and submitted by January 15, 2025.

The scoring would be conducted per each of the 8 sections to determine if the section is compliant, or non-compliant.

Title I, Part C Compliance Determination

The Title I, Part C compliance determination is based on the documentation submitted. We encourage regions to provide clear evidence demonstrating alignment with The Title I, Part C guidelines and regulations.



- **Compliant** A section is compliant when evidence submitted is clear and aligned with the *Title I-C Monitoring Scoring Criteria described above*.
- **Non-Compliant** A section is non-compliant when evidence submitted is missing, not clear, and/or not aligned with the *Title I-C Monitoring Scoring Criteria*.

The monitoring process helps identify areas for improvement and technical assistance needs to enhance the services provided to migrant students.

Financial Management and Cross-Cutting Requirement Domain

Domain	Why it matters	Self-Assessment Questions for Response	Self-Assessment Level 1-4	Requested Documentation	Documentation Score Compliance Status
1. Accounting Systems an	d Fiscal Controls				
1.1- Accounting System	Regions must use fiscal control and fund accounting procedures to ensure proper use of and accounting for Title I, Part C funds. How does your region protect against unauthorized obligations of Title I, Part C funds and/or improper payments? EDGAR 34 C.F.R. 76.702 Uniform Guidance 2 C.F.R. 200.302	Describe your standardized, documented procedures for accounting for Title I, Part C funds.	 Emerging Developing Proficient Exceptional 	Accounting system manuals, policies, procedures or other written description of accounting system and process. Available ODE Resources Supplement not Supplant Purchasing Food with Federal Funds Administrative Costs Carrying Over Federal Funds Maintenance of Effort Purchasing Store Cards with Federal Funds Transferability	
1.2. Allowable Costs	Any expenses must be reasonable, necessary, and allocable to the grant out of which the funds were paid.	Describe your process for approving expenditures to Title I, Part C.	EmergingDevelopingProficientExceptional	CIP BN Approved Applications (RY, PreK, SS).	



2. Internal Controls	Region's spending aligns with budget narratives Title I, Part C funds are used to supplement rather than replace state/district funds or activities. EDGAR 34 C.F.R. 76.702 Uniform Guidance 2 C.F.R. 200.302			Expenditure report (you can provide a ledger report or a report that includes date, vendor, item description, and amounts).
2.1 Budget Monitoring	Regions need to establish procedures to review program balances and compare expended amounts to budgeted amounts to maintain a level of fidelity to the approved CIP BN. Uniform Guidance 2 C.F.R. 200.303 Requirements for revising budget and program plans CFR § 200.308 Revision of budget and program plans, CIP Budget Narrative Quick Start Guide, p. 2, and Oregon Local Budgeting Manual, p. 66.	Do your policies and procedures for internal control include a regular review of program balances and comparing expended amounts to budgeted amounts? • Yes • No • Partially How often are your accounts reviewed, and who is involved in ensuring that all transactions are accurately and properly recorded?	 Emerging Developing Proficient Exceptional 	Policies or procedures for monitoring accounts and performing periodic reconciliations. Comparative Grant Budget Spending Reports for RY, Pre-K, and Summer. Available ODE Resource Template or the Grant Spending Report
2.2 Risk Identification and Mitigation	Identifying potential risks affecting the operation or performance of the program, including the types of risk evaluated and the process for establishing risk tolerances for different categories or types of risk. Uniform Guidance 2 C.F.R. 200.303	Do you have written procedures for identifying different types of risks? • Yes • No Do you have written procedures for responding to identified risks? • Yes • No	 Emerging Developing Proficient Exceptional 	Sample internal risk assessment manuals or other materials (e.g., internal risk assessment tools, descriptions of indicators, etc.)



2.3 Internal Controls and Evaluation	By using an internal control system, the regions ensure that the regional system is operating as intended.	How does your team respond when it identifies potential risk that could affect program operation or performance? How does your region evaluate the performance of its internal controls system to ensure that the system is	 Emerging Developing Proficient Exceptional 	Sample evaluations of the performance of the internal controls system, if available.	
	Uniform Guidance 2 C.F.R. 200.303	operating as intended? What process does your region use to identify and implement any changes based on the results of internal controls evaluations?	Z.ecptional	system, in available.	

Program-Specific Fiscal Requirements Domain

3 Equipment and Supplies Management						
3.1 Inventory	The maintenance of inventory ensures regions effective control over assets purchased with federal funds to ensure they are used solely for authorized purposes. Uniform Guidance 2 C.F.R. 200.313-314 GAO Green Book Principle 10.03	Does your program maintain an inventory of items of value \$5,000 or more purchased using Title I, Part C funds? • Yes • No	 Emerging Developing Proficient Exceptional 	Equipment and supplies management manuals, handbooks, etc. Most recent inventory of equipment and supplies purchased with Title I, Part funds. Available ODE Resources		
				Inventory Brief Sample Inventory Sheet		



3.2 Equipment and Supplies Use and Management	Proper equipment and supplies use, and management supports the appropriate use of equipment and supplies purchased with Title I, Part C funds. Uniform Guidance 2 C.F.R. 200.313-314 GAO Green Book Principle 10.03	Does your region have policies or procedures in place to ensure control over vulnerable assets (high-value and/or mobile items, including technology) purchased using Title I, Part funds? • Yes • No	 Emerging Developing Proficient Exceptional 	Policies for managing access and use of equipment and supplies Control policies for vulnerable assets.	
3.3 Equipment and Supplies Disposition	Proper procedures for equipment and supplies disposition that includes instances where items purchased with Title I, Part C funds have been damaged, lost, or stolen. Uniform Guidance 2 C.F.R. 200.313-314 GAO Green Book Principle 10.03	How does your region ensure that equipment and supplies are disposed of in accordance with applicable laws and procedures?	 Emerging Developing Proficient Exceptional 	Policies for disposition of equipment and supplies purchased using Title I, Part C funds.	
4 Personnel 4.1 Time & Effort	A system of internal controls is required to ensure personnel costs are allocable to the grant. Region has a process to track work activities for employees paid in part or in full by Title I, Part C funds Uniform Guidance 2 C.F.R. 200.430	Describe your system for tracking and documenting time and effort of staff paid out of federal funds and how it assures that charges are accurate, allowable, and allocable. Include information of use of multiple funding sources to paid regional staff.	 Emerging Developing Proficient Exceptional 	Policies and procedures for the organization's time and effort system (including a description of the controls designed to ensure accurate, allowable, and allocable personnel charges for Title I, Part C program) Sample time and effort documentation for Title I, Part C staff. Available ODE Resources	



		Breakdown of Staff Positions Sheet
		 Time and Effort Reporting Form (Sample)
		• <u>Time and Effort</u> <u>Brief</u>

Programmatic Domain

Domain	Why it matters	Self-Assessment Questions for Response	Self-Assessment Level 1-4	Requested Documentation	Compliance Status
5 Identification and Recre	uitment (ID&R)				<u> </u>
5.1- Quality Control: Training	Training is critical to ensure that recruiters and all other staff involved in determining eligibility and in conducting quality control procedures know the requirements for accurately determining and documenting child eligibility under Title I, Part C. ESEA § 1304(c)(8), § 1309(2)-(5) ESEA Regulations 34 C.F.R. §§ 200.89(b)-(d)	How many recruiters are employed across your region? How many are employed year-round versus summeronly? Do recruiters carry out recruitment duties only or do they recruit part-time in conjunction with other responsibilities? What is the average recruiter score on the IDRC assessment? What training and support has been provided to staff members with scores below 80%	 Emerging Developing Proficient Exceptional 	ID&R training materials for determining eligibility and documenting eligibility determinations. Attendee records for ID&R training. IDRC assessment scores.	
5.2 Quality Control: Supervision, Review, and Evaluation of Individual Recruiters	Supervision and annual review and evaluation of the identification and recruitment practices of individual recruiters contribute to quality control processes. ESEA	Describe the requirements for evaluating the recruitment practices of individual recruiters— e.g., methods to be used, frequency of evaluations?	EmergingDevelopingProficientExceptional	ID&R Plan/Manual and other documented policies/procedures for the evaluation of individual recruiters.	



5.3 Quality Control: Examination of Each COE	§ 1304(c)(8), § 1309(2)-(5) ESEA Regulations 34 C.F.R. §§ 200.89(b)-(d) Best practice: An examination by qualified individuals at the local operating agency level of each COE to verify that the written documentation is sufficient and that, based on the recorded data, the child is eligible for Title I, Part C services. ESEA § 1304(c)(8), § 1309(2)-(5) ESEA Regulations 34 C.F.R. §§ 200.89(b)-(d)	How are corrections made to individual recruiters' practices, where evaluations indicate a need to do so? Who reviews and approves each COE? What happens if the reviewer finds COEs that do not sufficiently document a child's eligibility? What happens if the reviewer finds COEs that incorrectly document a child's eligibility?	 Emerging Developing Proficient Exceptional 	Procedures for COE review and approval.
5.4 Quality Control: Prospective Re- interviewing	Best Practice: Involvement in the statewide process to validate that eligibility determinations were properly made, including conducting prospective re-interviewing	How do you use the results of the re- interview process to assess the effectiveness of your procedure?	EmergingDevelopingProficientExceptional	Report or summary of the most recently completed prospective re-interviews
6 Parental Involvement 6.1 Consultation with Parents of Migratory Children	The Title I-C program requires consultation with parents of migratory children, including parent advisory councils on planning and operation of regional programs. ESEA § 1304(c)(3), § 1116 ESEA Regulations 34 CFR § 200.83(b)	Describe how your region consults with parents of migratory children—including, but not limited to, parent advisory councils—in the planning and operation of the program.	 Emerging Developing Proficient Exceptional 	Evidence of consultation with parents of migratory children on program operations—including feedback/input provided— e.g., meeting agendas, meeting notes, presentations, sign in sheets from the past year.
6.2. Parent Advisory Council (PAC)	Evidence of parental involvement in the education of their children. Title I, Part C. Sec 1304 (c)(3) Title I, Part C requires that PACs must be established only for "programs	How are PAC members selected? How often does the PAC meet, and how many members does it have?	EmergingDevelopingProficientExceptional	Procedures for regional PAC. Agenda and minutes from PAC meetings from the prior school year.



	extending for one school year of duration." Title I-C sec 1304 (c)(3)	How many PACs operate in your region, and what is their configuration?		PAC Bylaws or any document that parents use to understand their PAC. Description of the PAC configuration, including current and previous year PAC members. Available ODE Resource Community Engagement Toolkit	
7. Provision of Services 7.1. Priority for Services (PFS)	In providing Title I, Part C funded services, priority must be given to migratory children who have made a qualifying move within the previous 1-year period and who—(1) are failing, or most at risk of failing, to meet the challenging State academic standards; or (2) have dropped out of school. ESEA § 1306(a), § 1304(b)(1), § 1304(b)(6), § 1304(c)(4), § 1304(c)(6), § 1304(d), § 1304(e) ESEA Regulations 34 CFR § 200.83	How do you ensure all the team is aware of who your PFS are and their needs? Evidence Priority for Service students' needs are assessed. Please describe this process in a narrative. How does your region align with compliance and requirements to serve PFS students?	 Emerging Developing Proficient Exceptional 	Evidence that Priority for Service students are identified please submit a living list that includes the following criteria: Migratory children who made a qualifying move within the previous 1-year period. Migratory children who are failing, or most at risk of failing, to meet the State's challenging academic standards or dropped out of school. Proxy risk factors for students who don't have state assessment data. *Graduation rates/dropout rates for the last 3 years.	



7.2 Continuation of Services (COS)	A child who ceases to be a migratory child during a school term shall be eligible for services until the end of such term; a child who is no longer a migratory child may continue to receive services for 1 additional school year, but only if comparable services are not available through other programs; and students who were eligible for services in secondary school may continue to be served through credit accrual programs until graduation. Title I-C sec 1304 (e)(1)(2) (3)	How is your region serving children who cease to be a migratory child during a school term? How is your region continuing to serve formerly eligible migratory children for one additional school year? How is your region providing high school credit accrual programs to formerly eligible migratory children?	 Emerging Developing Proficient Exceptional 	PFS/Non-PFS/Non-Migrant (ODE provides this data). *Evidence PFS served by Title I, Part Goal Areas (ODE provides this data). Written procedures/guidance for implementation of COS Narrative description of services provided after eligibility has ended, and students needs are unmet, including a table specifying the number of migratory students under COS (do not include names), and date of end of eligibility.
7.3 Comprehensive Support Services	Because student success is the overarching goal of the Title I, Part, services are a vital aspect of the program, Title I, Part C services are distinct in that they are the educational or educationally related activities provided to migrant children to enable them to succeed in school. These MEP-funded services for migratory children include, but are not limited to, advocacy, health, nutrition, social services, necessary educational supplies, and transportation.	How does your region provide support services to eligible migratory children, and what challenges or successes have you encountered in the process?	 Emerging Developing Proficient Exceptional 	Evidence of the provision of comprehensive services (provide a log of services per each one of the allocations disaggregated by Pre-K, Regular year, and Summer.



7.4 Comprehensive Instructional Services.	Any MEP funded instructional service. Include whether provided by a teacher or a paraprofessional.	How does your region provide instructional services to eligible migratory children, and what challenges or successes have you encountered in the process?	EmergingDevelopingProficientExceptional	Evidence of the provision of comprehensive services (provide a log of services per each one of the allocations disaggregated by Pre-K, Regular year, and Summer.
7.5 Comprehensive Instructional Services provided by licensed staff.	Reading/Language Arts, Mathematics or High School Credit Accrual instruction provided by a teacher. Do not include instruction provided by a paraprofessional.	How does your region provide Reading/Language Arts, Mathematics and High School Credit Accrual instructional services to eligible migratory children, and what challenges or successes have you encountered in the process?	 Emerging Developing Proficient Exceptional 	Evidence of the provision of comprehensive services (provide a log of services per each one of the allocations disaggregated by Pre-K, Regular year, and Summer.
7.6 Comprehensive Guidance/Counseling services.	Services to help a child to better identify and enhance his or her educational, personal, or occupational potential; relate his or her abilities, emotions, and aptitudes to educational and career opportunities; utilize his or her abilities in formulating realistic plans; and achieve satisfying personal and social development. These activities take place between one or more counselors and one or more counseles, between children as counselees, between children, and between counselors and other staff members. The services can also help the child address life problems or personal crises that result from the culture of migrancy.	How does your region provide guidance/counseling services to eligible migratory children, and what challenges or successes have you encountered in the process?	 Emerging Developing Proficient Exceptional 	Evidence of the provision of comprehensive services (provide a log of services per each one of the allocations disaggregated by Pre-K, Regular year, and Summer.



7.7 Consortia	Title 1-C funds, Consortium Leads commits to implementing high quality services and programs, particularly those grounded in research and evidence of success, that enable migratory children to succeed in school. Comprehensive services are provided to migrant students and their families. Title I-C Sec 1304 (c)(6) (A)	How, as consortium lead, are you working with consortium district members to ensure their needs are informing the MEP regional programmatic budget, and service implementation?	 Emerging Developing Proficient Exceptional 	Documentation that illustrates the coordination with consortium district members to better serve the migratory children within the consortium. This can include protocols, agenda meetings, presentations, internal controls for claim approvals.
				Completion of survey by district members: https://forms.gle/wthXG UagQrzm89kB7
8 Program Evaluation				
8.1. Program Planning and Evaluation ESEA §1304(c)(5) ESEA Regulations 34 C.F.R. 200.84 EDGAR 34 C.F.R. 76.770	The local operating agency must then develop measurable outcomes that are aligned with the State's measurable outcomes for the Title I, Part. Services are provided to Title I, Part students based on Oregon MPOs. Title I-C Sec 1306 (a) (1)(B)	written evaluation completed?	 Emerging Developing Proficient Exceptional 	Title I, Part written evaluation report including outcomes in the following areas to the extent possible. • Goal Area 1: Early Childhood Education • Goal Area 2: Graduation • Goal Area 3: Out-of-School Youth • Goal Area 4: Instructional Services • Goal Area 5: Health and Social- Emotional/Men tal Health



		Available ODE Resource Summer Best Practices MEP SDP	

^{*} ODE provides this information.