



# Florida Migrant Education Program

## Reasonable, Allowable, Necessary (RAN)

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# What is Reasonable, Allowable, Necessary (RAN) Criteria?

- It is the guiding principal for making decisions about what services and/or materials/resources can be purchased using federal funds.  
*For our purposes, Title I, Part C funds discussed.*
- An “allowable activity” is an activity that meets the requirements of section 1306(b) of the statute, comports with the cost principles in the Office of Management and Budget (OMB) Circular A-87, and meets the applicable requirements of EDGAR, particularly Parts 76 and 80. (See also Chapter XI – “State Administration.”).

# What makes a “cost” allowable?

- In order for cost to be allowable and thus charged to the MEP, they must be:
  - Necessary and Reasonable for the proper and efficient performance and administration of the MEP
  - Allocable to the MEP under the provision of the Circular
  - Consistent with policies, regulations, and procedures that apply uniformly to both Federal and Non-Federal funds, and;
  - Permitted by the “Selected Items of Cost” in Attachment B of the Circular

# Examples of Allowable Activities in Migrant Education Programs

- **Instructional services** (e.g., activities for preschool-age children and instruction in elementary and secondary schools, such as tutoring before and after school)
- **Support services** (e.g., acting as an advocate of migrant children, providing access to health and social service providers; providing migrant families with necessary supplies)
- **Professional development** (e.g., training programs for school personnel to enhance their ability to understand and appropriately respond to the needs of migrant children)
- **PAC and other parental involvement activities** (see Questions B11-B13 and C4-C7 in Chapter VII – “Parental Involvement”)
- **Identification and recruitment**
- **Coordination activities** with other agencies, both within the State and with other States nationwide, including the transfer of student records;
- **Comprehensive needs assessment activities**
- **Evaluation of the MEP**

## **Are there any instances in which an SEA or local operating agency may use MEP funds to benefit children who are not migrant?**

Yes. Although MEP funds are generally used only to serve eligible migrant children who meet the statutory definition of “migratory child,” there are several circumstances in which MEP funds may be used to benefit children who do not meet this definition:

- Schoolwide Programs – In a schoolwide program, a school may combine MEP funds with funds from other Federal, State, and local programs to serve all of its students, regardless of their eligibility for the program. (See section C of Provision of Services chapter for more detail on schoolwide programs.)
- Continuation of Services – Under certain circumstances, section 1304(e) of the statute allows SEAs to continue to provide services to children who are no longer migrant. (See Question A9 below.)
- Incidental Inclusion – In carrying out the MEP, an agency may serve non-migrant children on an incidental basis if this inclusion does not: (1) decrease the amount, duration, or quality of services to migrant children; (2) increase the cost of providing the services; or (3) result in the exclusion of migrant children who would otherwise receive services.

# Additional Guidance for RAN

- Office of Management Budget (OMB) Circular A-87
- EDGAR, particularly Parts 76 and 80. (See also Chapter XI – “State Administration.”)
- US Department of Education Title I Part C Non-regulatory Guidance (NRG), October 2010 – particular sections Fiscal Requirements and Provision of Services

# RAN Resource

## Florida Migrant Education Program RAN Document



# Practical Application Exercise

- Present scenario
- Discuss as a group
- Determine if request to purchase item or to expend funds meets all aspects of RAN.
- Some times you will find you will need to ask additional questions to determine RAN
- Identify the reasons/issues why or why not the situation meets RAN.

# Scenario I

- All the public schools in the district require school uniforms. The district MEP wants to budget to purchase a school uniform for every in-school migrant student in the district.
- Does this type of purchase/budget item meet RAN?

# Probing questions for Scenario 1

- Has a needs assessment for each student been done?
- Have you identified and determined there are no other sources to cover cost of uniforms?

## Scenario 2

- The district has a summer program for 3<sup>rd</sup> grade students only. Students arrive via their own transportation. All 3<sup>rd</sup> grade migrant students in need are enrolled in that program. The local Migrant Education Program (MEP) has arranged for additional summer programming for students in other grades. Given the need, a bus to transport migrant students to the migrant summer program also arranged. The district has learned that there are five 3<sup>rd</sup> grade non-migrant students who need transportation to district program. There is space on the migrant bus and the bus will not need to go out of their way to pick up these students.
- Does this use of the fully migrant funded bus for transportation meet RAN?

# Probing questions for Scenario 2

- Have you ensured that the bus does not need to go out of its way to pick up the non-migrant students?
- Remember this: It can be tricky if additional migrant students show up in the district and are identified in need for summer MEP programming and transportation. You may need to remove the non-migrant students from bus to accommodate new migrant students.
- What if migrant students in district's 3<sup>rd</sup> grade summer program need transportation? Can the district MEP provide it?

## Scenario 3

- There is a vendor that offers computer-based instruction for an 8-week period then provides each participating student a computer to keep for themselves. There is space for 25 students. The program roughly cost \$2,500/per student. The district MEP has assessed that migrant student increased access to technology is a need and there is enough funds in the budget to cover the program.
- Does participation in this program meet RAN?

# Probing questions for Scenario 3

- How do you equitably determine which migrant students participate in this program?
- In what ways can you meet the need for increased access to technology in a more economical and efficient manner?
- In what ways can you modify the program so it does meet RAN?

# Scenario 4

- A Title I Pre-kindergarten (Pre-K) program and a Migrant fully-funded Pre-K program are both housed in one of the district schools. Both exist based on need. At the beginning of the school year, the 22 slots in the Title I Pre-K program is full and 15 of the 22 slots in the Migrant Pre-K program are filled. (Note migrant students are enrolled in the Title I Pre-K program before enrolled in Migrant Pre-K.) The district MEP knows that some migrant pre-K children arrive later and will fill those available slots. However, prior to those students arriving, four non-migrant pre-K students arrive at the school and the principal wants to enroll them into the Migrant Pre-K classroom.
- Does enrolling these students in the Migrant Pre-K program meet RAN?

# Probing questions for Scenario 4

- What is a possible option for creating the situation to make this allowable?
- What can you do to manage relationships with school-based administration?

# Scenario 5

- The district MEP offers in-home family literacy programming. Data and parent input reveals that the program is successful. One non-OSY migrant parent feels so engaged that she feels she wants to move beyond the in-home instruction and wants to obtain her GED. She meets all the qualifications for enrolling in GED program. She asks the district MEP to cover the cost of her participation so she can continue to assist her children with their academics.
- Can the district MEP cover the cost of this parent's participation in GED?

# Probing questions for Scenario 5

- What other options are available for this parent?
- What if the parent was an OSY? Would it be allowable? If so, under what circumstances?

# Comprehension Check



# Contact Information

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<http://www.fldoe.org/bsa/titleI/doemep.asp>

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