2015-16 FASFEPA/ECTAC Spring TA Forum
Florida Migrant Education Program

Best Practice – Fiscal: Reasonable, Allowable, Necessary (RAN)

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May 6, 2015

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Workshop Objectives

- Understand the definition for and intent of Reasonable, Allowable, and Necessary (RAN)
- Understand how RAN impacts budget and program decisions and activities
- Review FMEP RAN Tool Resource and RAN Scenarios

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) Uniform Guidance, and meets the applicable requirements of EDGAR, particularly Parts 76 and 80. (See also Chapter XI – "State Administration.").

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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 Uniform Guidance

- Consistent with policies, regulations, and procedures that apply uniformly to both Federal and Non-Federal funds, and;

- Permitted by the Cost Principals in Uniform Guidance (formally "Selected Items of Cost" in Circular)

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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**

* Source: US Department of Education Title I, Part C Non-Regulatory Guidance (Oct 2010)

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:

- <u>Schoolwide Programs</u> – 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.)

- <u>Continuation of Services</u> – 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.)

- <u>Incidental Inclusion</u> – 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) Uniform Guidance

- 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

Purpose of Exercise: To understand the process for determining if something meets RAN.

- Present scenario
- Discuss as a group
- Determine if request to purchase item or to expend funds <u>meets all aspects</u> 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 1

- The LEA MEP wants to conduct a summer reading program with two parts. <u>Part 1</u>: Offer classroom-based reading program 3x/week focused on increasing fluency, comprehension, and vocabulary for students in grades K – 6. <u>Part 2</u>: For students not involved with Part 1, provide "Bags with Books" including self-directed reading assignments and worksheets for students to complete.

Probing questions for Scenario 1

- In general, are these allowable activities?

- What else do you need to know to create a budget for these activities?

- Do you report Part 1 and 2 activities as instructional services in your local student database? If so, how?

Scenario 2

- Last year, two vehicles were purchased with migrant funds to be used for ID&R as well as transportation for migrant students and families. This year, other federal programs want access to the vehicles for non-MEP student transportation purposes.

Probing Questions for Scenario 2

- Is it allowable for other federal programs to use the vehicles?

- What are the conditions under which other federal programs may use the vehicles?

- What issues may arise if MEP allows or does not allow other federal programs to use the vehicles?

Scenario 3

- ID&R staff sometimes recruit in isolated, dangerous areas, at night, and/or on their own. This may create a need for heightened safety measures. The ID&R staff wants the MEP to purchase cell phones and cell phone service for them to use during the ID&R activities as a safety precaution.

Probing questions for Scenario 3

- Does the purchase of cell phones and cell phone service meet RAN?

- Are there any local, district, or state rules that prevent the purchase of cell phone and/or cell phone service? If so, what are they?

- What conditions, if any, need to be placed/met on the use of the cell phone/service?

Scenario 4

- A district MEP covers the cost of a limited number of students to attend a summer day camp offered by a community partner. Participation in the camp is an opportunity migrant student would not have without the MEP. The camp offers a STEM component and recreational activities.

Probing questions for Scenario 4

- Does this program meet RAN?
- How do you equitably determine which migrant students participate in this program?
- Does the program meet the FMEP Summer Program requirements? Please explain.

Scenario 5

- The ID&R staff would like to go out to the community on Sundays to identify and recruit families because many families are available at that time to complete the Certificate of Eligibility (COE).

Probing questions for Scenario 5

- Can the MEP allow this?
- What is the pay structure for full-time equivalent (FTE) and hourly staff?
- Has the MEP budgeted to accommodate this activity if additional pay is needed?
- Is flex time permissible in order to conduct ID&R activities outside of a typical workday schedule?

Scenario 6

- 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.

Probing questions for Scenario 6

- Does enrolling these students in the Migrant Pre-K program meet RAN?
- What is a possible option for creating the situation to make this allowable?
- What can you do to manage relationships with school-based administration?

Comprehension Check
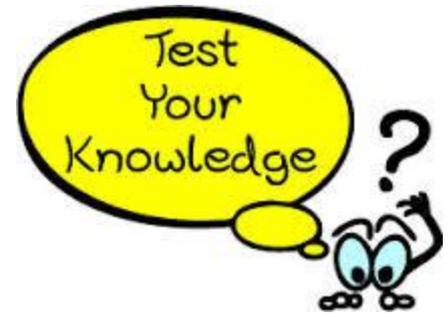
RAPID FIRE

Rapid Fire 1

- The MEP wants to purchase t-shirts for migrant students who will participate in an MEP-funded educational field trip. The t-shirts will help staff identify students while at event. Does this meet RAN?

- Answer: No, if it is an automatic purchase for all students. But based on a needs assessment, t-shirt may be purchased for a child who cannot afford or does not have a shirt. (NOTE: Other sources must be used first.)

Rapid Fire 2

- The MEP wants to purchase PS4 and Xbox One as part of their physical activity component of their afterschool program. Does this meet RAN?
- Answer: No, it is not necessary.

Rapid Fire 3

- The MEP purchased two new curriculums at $500.00 each. Does the MEP need to track/maintain a list of these purchases? Explain response.

- Answer: Yes, Florida requires sub-recipients to track "attractive items" with a purchase price below the capitalization threshold.

Rapid Fire 4

- In your Title I, Part C budget, what do you need to include in a description of an Activity?

- Answer: Activity name/description and project need/goal.

Rapid Fire 5

- A MEP purchase an OSY kit that contains a toothbrush, toothpaste, disposable razor, lotion, mouthwash, OSY bag, wet wipes, shampoo and conditioner? Are all these purchases allowable?
- No, lotion and wet wipes are not allowable.

Rapid Fire 6

- Which FDOE document kicks starts the onset of your grant period?
- Answer: DOE 100A

Rapid Fire 7

- Which DOE report your final project disbursements?
- Answer: DOE 399

Rapid Fire 8

- What is the budget period for Title I, Part C projects?
- Answer: July 1 – August 31

Rapid Fire 9

- What are three types of DOE amendments?
- Answer: Budget, Program and No-Cost Extension

Rapid Fire 10

- Food is an allowable expense at a MPAC meeting attended by parents and their children. True or False?
- Answer: True

Rapid Fire 11

- What date does Uniform Guidance go into affect for state administered programs?
- Answer: July 1, 2015

Questions?

Contact Information

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http://www.fldoe.org/bsa/title1/doemep.asp

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