

U.S. DEPARTMENT OF EDUCATION

# Non-Regulatory Guidance on Allowable Services to HEP and CAMP Students

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2/10/2014



*Other than statutory and regulatory requirements included in the document, the contents of this guidance do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.*

**Purpose of the Guidance:** The purpose of this guidance is to provide information about allowable services to participants in the High School Equivalency Program (HEP) and the College Assistance Migrant Program (CAMP), authorized under section 418A of the Higher Education Act of 1965, as amended (HEA). This guidance represents the Department's current thinking on this topic. It does not create or confer any rights for or on any person. This guidance does not impose any requirements beyond those required under applicable law and regulations. If you are interested in commenting on this guidance document, please send your comment to [OESEGuidanceDocument@ed.gov](mailto:OESEGuidanceDocument@ed.gov).

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## **I. Services to High School Equivalency Program (HEP) Students**

### **Statutory Requirements:**

Section 418A(b) and (c) of HEA

### **Regulatory Requirements:**

34 CFR part 206

#### **A. HEP Services Overview**

##### **A1. What are the general categories of allowable services that a HEP project may provide?**

In accordance with 34 CFR 206.10(a), a grantee may use funds under HEP to support approved projects designed to provide academic and supporting services and financial assistance to eligible participants as described in 34 CFR 206.3

##### **A2. What types of services does 34 CFR 206.10(b)(1) allow HEP projects to provide?**

A HEP project may provide the following types of services to assist participants in obtaining the equivalent of a secondary school diploma, and as needed, to assure the success of the participants in meeting the project's objectives and in succeeding at the secondary school level and beyond:

(i) Recruitment services to reach persons who are eligible under 34 CFR 206.3 (a) and (b).<sup>1</sup>

(ii) Educational services that provide instruction designed to help students pass an examination and obtain a certificate that meets the guidelines for high school equivalency established by the State in which the project is located.<sup>2</sup>

(iii) Supportive services that include the following:

(A) Personal, vocational, and academic counseling;

(B) Placement services designed to place students in a university, college, or junior college program (including preparation for college entrance examinations), or in military services or career positions; and

(C) Health services.

(iv) Information concerning and assistance in obtaining available student financial aid.

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<sup>1</sup> Please note that guidance on outreach and recruitment can be found in the *HEP/CAMP Non-Regulatory Guidance on Recruitment and Eligibility*, available at: <http://www2.ed.gov/programs/hep/legislation.html>.

<sup>2</sup> For projects with sites in multiple States, these would be the guidelines for high school equivalency established by the State in which the student is testing, most likely the State in which the site is located.

- (v) Stipends<sup>3</sup> for high school equivalency program participants.
- (vi) Housing for those enrolled in residential programs.
- (vii) Exposure to cultural events, academic programs, and other educational and cultural activities usually not available to migrant youth.<sup>4</sup>
- (viii) Other essential supportive services, (such as transportation and child care) as needed, to ensure the success of eligible students.
- (ix) Other activities to improve persistence and retention in postsecondary education.

**A3. Where can grantees find more information on HEP recruitment and eligibility?**

Grantees are encouraged to refer to the *HEP/CAMP Non-Regulatory Guidance on Recruitment and Eligibility* for more information on allowable recruitment services and student eligibility.

**B. Educational Services for HEP**

**B1. What specific types of HEP educational services are allowable under 34 CFR 206.10(b)(1)(ii)?**

The regulations state that HEP projects may provide educational services that provide instruction designed to help students pass an examination and obtain a certificate that meets the guidelines for high school equivalency established by the State in which the project is located. However, the regulations do not elaborate on what these educational services might entail. As such, projects have extensive flexibility to determine appropriate educational services, provided these services are consistent with the objectives of the program and the plan set out in the project’s application. A HEP project’s educational services might include, but are not limited to: classroom instruction; tutoring; and access to online and computer-based instructional resources.

**B2. Must the HEP project conduct instruction and testing in English?**

No. There is no requirement that instruction, other services, and testing be conducted in English. For example, the General Educational Development (GED) test is offered in Spanish as well as English, and HEP grantees may prepare participants to take it in either language. Projects may offer services and support testing in any of the available languages for exams leading to high

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<sup>3</sup> Regardless of how the financial support to a project’s HEP students is defined or classified by the grantee or partner institution (i.e., whether or not this support is called a “stipend”), all such direct financial support is to be reported in the “Training Stipends” category of a grantee’s ED 524 form and other budget documents submitted to the Department. Also, please remember that in budgeting for your project, stipends are not considered in the calculation of indirect costs.

<sup>4</sup> Please note that in this context, “migrant youth” should be understood to mean those individuals eligible to participate in a HEP project, i.e., both migrant and seasonal farmworkers, and members of their immediate family.

school equivalency (HSE) credentials in their States. In some cases, students who test in a language other than English may have the opportunity to take an additional test of English as a Second Language (ESL). Therefore, projects may provide instructional services and other support to help students pass the ESL test as well. In cases where instruction and testing are taking place in a language other than English, it may be important for projects to employ bilingual staff members in appropriate positions. Please note that if use of bilingual staff members is proposed in the project's application, the project must employ individuals with those qualifications.

**B3. May HEP projects provide instruction in computer literacy?**

Yes. With learning and testing becoming increasingly computer-based, HEP projects are encouraged to incorporate basic computer literacy into their instructional services designed to help students pass a high school equivalency examination. Projects should seek to familiarize their students with computers and keyboarding (including the use of a Spanish keyboard where appropriate) to enable them to pass computer-based high school equivalency examinations.

**B4. Are HEP projects required to provide the instructional services for students directly?**

No. For example, consistent with its approved application, a HEP project could focus its own activities on recruitment and supportive services to students, and then enroll these students in existing high school equivalency classes (e.g., an Adult Basic Education class at the grantee institution of higher education (IHE)). In such cases, the grantee may need to develop a memorandum of understanding (MOU) or some other formal document that clearly establishes the expectations and responsibilities of the involved parties.

Whether a grantee would provide these services directly or indirectly, in the competitive grant award process applicants will be evaluated, in part, on how well they are able to demonstrate the magnitude of the need for the proposed project services, as well as the extent to which specific gaps or weaknesses in services, infrastructure, or opportunities have been identified and will be addressed. In other words, applicants will be expected to demonstrate how the proposed project addresses an unmet need. In cases where high school equivalency services are already available, applicants may need to show how other existing needs not met through currently available services will be addressed with HEP services.

Additionally, all applications are evaluated, consistent with the competition's selection criteria, in terms of the extent to which the design of the proposed project is appropriate to and will successfully address the needs of the target population.<sup>5</sup> Therefore, an applicant proposing a model of indirect service delivery should clearly explain in its application how the proposed project is addressing an unmet need, and why it has the potential to successfully address these needs. Finally, when using this indirect model, student record-keeping is particularly important so projects can accurately report the number of students served and the number of successful

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<sup>5</sup> All applications also have their proposed uses of program funds evaluated for reasonableness in accordance with cost principles contained in the relevant Office of Management and Budget (OMB) regulations in 2 CFR part 200.



high school equivalency completers among the HEP students for whom the project is not providing direct instruction.

It is important to note, as well, that even when the HEP grant recipient is not providing instructional services directly, the HEP recipient is still held accountable for meeting the national Government Performance and Results Act (GPRA) program targets, as well as the objectives of the approved application. Therefore, HEP applicants and grantees should consider proposing a model of indirect instructional service delivery only if a high degree of oversight and coordination exists between the HEP recipient and any partner or subcontractor actually providing instruction and other direct services.

**B5. May HEP projects serve students on a preliminary or probationary basis, but enroll them into the program only after they have reached a minimum proficiency threshold?**

No. Neither the HEP statute nor the implementing regulations permit grantees to provide services on a preliminary basis to students who are not enrolled in the HEP program.

Moreover, while most HEP projects screen students to establish whether they are above or below a proficiency threshold, the Department has not established a minimum proficiency for HEP participants. Therefore, projects determine for themselves what this minimum proficiency threshold for enrollment will be. However, regardless of the minimum standard being used, all students served by HEP funds must have their eligibility for the program established and documented. They also must be reported as “served” by the HEP program on the HEP Annual Performance Report (APR). Per the instructions in the HEP APR, students are reported as “served” once they have completed intake and are enrolled and attending HEP instruction for at least 12 hours of instructional services within the respective budget period. Therefore, regardless of a student’s initial academic proficiency level, for the student to be served using HEP funds the student must be enrolled as an eligible HEP student and be reported as served once he or she receives 12 hours of instructional services. Serving students on a preliminary or probationary basis is not consistent with these requirements.

**B6. Is the GED test or credential the only high school equivalency option that HEP projects may support?**

No. Section 418A of the Higher Education Act of 1965, as amended (HEA) (the legislation authorizing the HEP) states that HEP grantees may provide "educational services which provide instruction designed to help students obtain a general education diploma which meets the guidelines established by the State in which the project is located for high school equivalency." The statute does not make reference to the GED. Also, the GED is not mentioned in the HEP regulations in 34 CFR Part 206, which refers generally to "the equivalent of a secondary school diploma" when describing the high school equivalency options that HEP may support. HEP grantees may help eligible students prepare for any test and subsequent credential that are accepted by the State as constituting high school equivalency, and HEP projects may use grant funds to prepare students for these examinations and facilitate their taking the exam.

## C. Supportive Services for HEP

### C1. **What types of supportive services are allowable for HEP under 34 CFR 206.10(b)(1)(iii) and (viii)?**

Section 206.10(b)(1)(iii) of the HEP regulations states that to assist participants in obtaining the equivalent of a secondary school diploma and, as needed, to assure the participants' success in meeting the project's objectives and in succeeding at the secondary school level and beyond, HEP projects may provide supportive service, which may include the following:

- (A) Personal, vocational, and academic counseling;
- (B) Placement services designed to place students in a university, college, or junior college program (including preparation for college entrance examinations), or in military services or career positions; and
- (C) Health services.

In addition, under section 206.10(b)(1)(viii), HEP projects are permitted to provide other essential supportive services (such as transportation and child care), as needed, to ensure the success of eligible students.

All of these services may be provided using HEP funds, the resources of the participating IHE or nonprofit organization, or by coordination with other service providers.

### C2. **What are some examples of allowable HEP supportive services in each of the categories specified in the regulations?**

Examples of allowable supportive services in these categories include, but are not limited to:

- **Personal, vocational, and academic counseling:**
  - Personal counseling could, for example, consist of project staff or other grantee personnel providing counseling to students on personal challenges, such as family problems or stress.
  - Vocational counseling could consist of advising students on job training programs in the area, or providing an assessment of interests and skills to help a student choose the type of work he or she may want to pursue.
  - Academic counseling could include, for example, discussing expectations for the students' participation in the project, helping students develop improved study skills, or advising students of education options available to them upon completion of their HSE.
- **Placement services:** Examples may include helping a student complete his or her application to the local community college, or assisting a student in applying for financial aid for postsecondary education. It might also involve helping students draft resumes and cover letters, fill out job applications, or develop interviewing skills.

- **Health services:** This might involve working with students to ensure they are able to utilize health services available to students through the grantee’s IHE (e.g. a student health center or clinic). Projects may also provide other health services on an as-needed basis when the services are determined to be necessary to ensure the student’s participation in the HEP project. (See question G1 on the additional requirements for health services and financial support.) For example, a HEP project might partner with a local eye doctor to provide eye exams and glasses for incoming students or provide free or reduced rate dental checkups as needed.
- **Other essential supportive services:** These services might consist of providing transportation to take students to a testing center, or arranging on-site childcare during classes for students with children. Student transportation might also be supported through a transportation stipend or gas card provided to participating HEP students. Providing meals for students when they attend class or on testing days is another possible support service that could be provided to ensure student success (See question E3 for more information on providing food to HEP students).

While these kinds of supporting HEP services are generally allowable, as with use of any grant funds a determination of whether they may be provided in a given situation depends on (1) consistency with the scope and objectives of the approved HEP application, and (2) conformance with the relevant OMB Cost Principles for Federal grantees (OMB Cost Principles) in 2 CFR part 200, such as those requiring that all costs charged to Federal grants be necessary and reasonable.

## **D. Financial Support for HEP Students**

### **D1. What financial supports do the regulations allow HEP projects to provide to their students?**

Under 34 CFR 206.10(b)(1)(iv),(v), and (vi), HEP projects may provide their students with: information concerning and assistance in obtaining available student financial aid; stipends for high school equivalency program participants; and housing for those enrolled in residential programs.

### **D2. What are “stipends” and how are they used?**

While the HEP regulations do not provide a definition of the term “stipend”, for the purposes of the HEP program grantees may consider a stipend to be project funds provided directly to participating students, or on their behalf, to offset living or educational expenses, thereby facilitating their participation in the program (e.g., providing a stipend for childcare because, without childcare, the student cannot attend class). Stipends should help to facilitate the student’s continued participation in the project and ultimate attainment of the equivalent of a secondary school diploma. Only a student currently participating in a HEP project is eligible to receive a stipend, as the regulations specifically state that stipends are allowable, “...for high school equivalency program participants” (34 CFR 206.10(b)(v)). For example, a stipend could be given to offset the cost of transportation to and from classes, or to help the student purchase necessary books and supplies not otherwise provided by the project. Regardless of the purpose or amounts

of a stipend, the project must have clear, established, consistent, and documented internal policies for the distribution of stipends, as well as documentation of stipends issued and received by students. Finally, please note that all grantees should follow their institution's or organization's policies on payments to individuals when stipends are paid to students.

**D3. Is there a limit on the amount of a stipend that may be paid to a HEP participant?**

No, but the type and amount of any stipends paid directly to students must be necessary and reasonable for the success of the project. In addition, per section 206.10(c) of the HEP/CAMP regulations, financial support services (which the Department interprets to include stipends) are only allowable if they are necessary to ensure a student's participation in the HEP project, and do not detract, because of the amount, from the basic educational services provided under the program. For example, an approved project application that proposed a specific level of direct classroom instruction could not then divert so much money to stipends (and other financial support of students) that the remaining funds are insufficient to provide the approved level of instruction.

**D4. May stipends be used as incentives for student academic achievement or completion of the equivalent of a high school diploma?**

No. As noted in question D2, HEP projects may only give stipends to students during their participation in the program. Additionally, as noted in question D3, stipends are allowable only to the extent that they are necessary and reasonable to ensure a student's participation in the project. Meeting unmet student needs and removing barriers to participation in the project are the required rationales for providing stipends to participating students, not creating an incentive for increasing student achievement or completing one's HSE. HEP projects are certainly encouraged to employ effective practices for motivating students, but the use of stipends is not an appropriate means of doing so.

Please note also that projects may use student participation (e.g. how many classes the student attends) to help determine stipend amounts; this kind of basis for calculating the amount of stipends would not constitute using stipends for incentives since the amount of stipend will vary based on participation levels. For example, a project could give a larger transportation stipend to students who attend class more often, since those students would incur higher transportation costs.

**D5. May a HEP project change the stipend amounts from the levels listed in its application?**

Yes, but Departmental approval, usually from your assigned program officer, is required for any reduction in stipend amounts. According to the Education Department General Administrative Regulations (EDGAR) at 34 CFR 74.25(c)(7), grant recipients are required to request prior approval for the transfer of funds allotted for training allowances (direct payment to trainees) to other expense categories. HEP stipends are considered to be a training allowance; therefore any transfer of funds from this budget category to another budget category requires Departmental approval. However, there is no such prior approval requirement for grantees to transfer money to the training allowance budget category (i.e., increase the stipend amounts).

It is important to note that, for budgetary purposes, adjusting actual stipend amounts provided to individual students or among various types of stipends (e.g., a commuter HEP project transferring money originally allocated to child care stipends into additional transportation stipends to better meet student needs) does not require prior approval. This is an adjustment in the distribution of stipends, but it does not represent a transfer of the overall funds allotted for stipends out of that category to another budget category.

Additionally, when grantees increase (or decrease with approval from the Department) the level of stipends through the annual revised budget, this adjusted level becomes the amount of funds allotted for stipends; therefore any subsequent transfer of funds to other categories requires prior approval (see 34 CFR 74.25(c)(7)).

**D6. Which HEP students are eligible for housing assistance?**

HEP projects, in accordance with 34 CFR 206.10(b)(1)(vi), may provide housing only for those students “enrolled in residential programs.” Residential programs are those in which the students live away from home at the site of the project, generally on a college campus. For the purposes of determining whether housing support for HEP students is allowed, residential programs may be defined as any project with a residential component. Housing assistance is not permitted for students attending exclusively commuter HEP projects. Some projects offer a combination of both commuter and residential opportunities for students; for these projects, residential students would be eligible for housing assistance, while commuter students would not. Project staff may provide support services to non-residential students with housing problems (e.g. helping them fill out a rental application), but may not provide direct financial housing assistance to non-residential students.

Allowable housing support for residential HEP students may also include meals or, if the project includes on-campus housing, a meal-plan at the IHE. (Commuter students may also receive support for meals as an “other essential supportive service”, but only during times they need to be “on campus” for receipt of HEP services.)

**E. Other Activities for HEP Students**

**E1. What cultural, academic, and educational enrichment opportunities are HEP projects able to provide to their students?**

Under section 206.10(b)(1)(vii) of the regulations, HEP projects may provide their students with exposure to cultural events, academic programs, and other educational and cultural activities usually not available to migrant youth. Please note that in this context, “migrant youth” should be understood to mean both migrant and seasonal farmworkers (as these terms are defined in 34 CFR 206.5(c)(7) and (8), respectively), and members of their immediate family (as defined in 34 CFR 206.5(c)(5) (i.e., those that may be eligible for the program)).

When deciding if a potential activity would be allowable under this provision, HEP project staff should consider the following three questions:

- First, is the potential activity aligned with the activities, goals, and objectives set out in the approved application?
- Second, is the potential activity reasonable, as defined in the relevant OMB Cost Principles (2 CFR part 200)?
- Third, can project staff members justify how these activities are primarily cultural, academic, or designed to expose students to activities not usually available to migrant youth, and not merely entertainment? Note: entertainment activities are generally unallowable under the Cost Principles.

If project staff can answer “yes” to all three questions, and can sufficiently document these determinations, this may be an allowable activity under section 206.10(b)(1)(vii).

Examples of allowable activities could include, but are not limited to: trips to the local theater to see a play or musical performance, visits to zoos or aquariums, tours of college campuses, visits to local museums or historical sites, or workshops on topics such as nutrition or personal finances. Regardless of what particular activities HEP projects carry out under this category, it is important that the project keep adequate records of the events and student participation.

**E2. Are HEP graduations an allowable educational activity?**

Yes. The Department treats modest HEP graduation or student recognition ceremonies as a means of motivating students and enriching their academic experience. Costs associated with such ceremonies, however, must be necessary and reasonable. (These costs should be described in the “Other” section of the project’s budget.)

**E3. May HEP funds be spent for food and refreshments provided to HEP students during HEP-sponsored student activities or events?**

Yes. Expenditures for refreshments or food are allowable when such expenditures are necessary and reasonable for the success of these meetings or events.

**F. Activities to Improve Persistence and Retention of HEP Students in Postsecondary Education**

**F1. What activities relating to postsecondary education do the HEP regulations permit?**

Under section 206.10(b)(1)(ix) of the regulations, HEP projects are permitted to carry out “other activities to improve persistence and retention in postsecondary education.” In other words, HEP projects may assist HEP HSE completers with placement in IHEs, as well as activities designed to help students persist in and complete higher education programs.

Because (1) most HEP projects have the majority of their direct contact with students prior to the students completing HSE, and (2) HEP projects do not extend into a student’s first year at an IHE, project staff may want to focus their activities in this regard on those that will both help students obtain the equivalent of a high school diploma, and prepare them to be successful in higher education.

Examples of such activities might include, but are not limited to, holding study skills or life skills workshops to help HEP students manage the challenges of postsecondary education; touring a college campus with HEP students and introducing them to support staff and resources on that campus to help them utilize these resources if they continue into higher education; assisting HEP students, through academic and financial support, with taking required college entrance examinations.

Grantees should remember, however, that activities to improve HEP students' persistence and retention in postsecondary education should be designed to complement, and not detract from, the primary objective of the program, which is to help students obtain the equivalent of a secondary school diploma. Without the HSE credential, persistence and retention in postsecondary education cannot occur.

## **G. Additional Requirements for HEP Services**

### **G1. What additional requirements do the regulations establish in part 206 for health and financial support services to HEP students?**

In accordance with section 206.10(c), health and other financial support services provided to HEP students must: (1) be necessary to ensure their participation in the program, and (2) not detract, because of the amount, from the basic educational services provided under those programs. In other words, while health and other financial support services are recognized as being important, their provision should not take away from the core of the program, which is to provide educational services designed to help students attain the equivalent of a high school diploma.

### **G2. What requirements exist for coordination of services by HEP grantees?**

Each HEP applicant must provide an assurance in its grant application that it will develop and implement a plan for identifying and using the resources of the participating IHE and the community to supplement and enhance the services provided by the project (34 CFR 206.20(d)(2)). If the applicant is awarded a grant, this plan must be clearly incorporated into the project's policies and procedures to ensure that the project is not duplicating services already available at the IHE or in the community. For example, a HEP grantee may coordinate with the IHE to facilitate the use of an existing campus computer lab by HEP students for their homework, rather than establishing a separate lab for the HEP project. An example of a project's use of community resources would be its referral of HEP students to a community health clinic that provides eye exams, rather than paying more for the students to get these exams from a private provider. When coordinating services with IHEs and community partners, grantees may want to consider entering into MOUs with partner organizations to ensure that the terms of the services to be provided are clearly defined.

### **G3. Must a HEP grantee deliver its services to students exactly as specified in its approved application?**

Recipients of HEP grants, like recipients of all other Department grants, are required to comply with applicable statutes, regulations, and approved applications, and to use Federal funds in

accordance with those statutes, regulations and applications. (See 34 CFR Section 75.700 of EDGAR.) Thus, HEP grantees are responsible for implementing their project activities in a manner that conforms to their approved application and any approved revisions. However, grantees do have some flexibility to alter their projects in order to improve them or to adapt their projects to changing circumstances. Grantees should refer to EDGAR section 74.25 for a list of changes that require prior approval from the Department's program officer. As a general rule, grantees should, at a minimum, inform their program officer of any significant change to project services even if the change does not expressly require prior approval. Please note that other than in very limited circumstances, such as a sudden and significant reduction in program funding, the Department cannot agree to a reduction in the number of students the project is funded to serve, or to other key project objectives, such as the program's GPRA targets.

## **H. Follow-Up and Placement Services for HEP Graduates**

### **H1. What is the purpose of HEP beyond assisting participants in obtaining the equivalent of a secondary school diploma?**

HEP is designed to help students to obtain the equivalent of a secondary school diploma and subsequently to gain employment or be placed in an IHE, other postsecondary education or training, or in the military (34 CFR 206.1(a) and 206.10(b)(iii)(B)). In addition, the HEP APR explains that the secondary key objective of the program (GPRA 2) is for HEP recipients of the HSE to enter postsecondary education or training programs, upgraded employment, or the military.

The APR, therefore, requires grantees to report on the number of their HSE-attaining students who enter qualifying placements in these categories, as defined in the APR.

### **H2. How are "postsecondary education or training programs" defined in the APR for purposes of reporting qualifying HEP placements?**

The HEP APR states that for a student to be counted as placed in a postsecondary education or training program for the purposes of meeting the performance measure for HEP recipients of the HSE to enter postsecondary education or training programs, upgraded employment, or the military (GPRA 2), the student must enter at least one of the following programs:

- 1) A postsecondary education program at an IHE designed to ultimately attain an A.A., B.A., B.S. or other degree. OR
- 2) An industry-recognized postsecondary vocational or career and technical education program, designed to attain a credential, certificate, or degree that would assist one in obtaining upgraded employment.

Please note that for a vocational or career and technical education program to qualify, it must meet all parts of the definition in item 2, above. See question H3 below for additional information on this topic.



**H3. How may a grantee determine whether or not a HEP participant's placement in a particular training program qualifies for GPRA 2 reporting?**

Grantees must consider several factors when determining whether such a placement qualifies for GPRA 2 reporting. First, the training must be a "program", a word that plainly implies a set of related courses or trainings with a common objective, and not a single or stand-alone training. Second, the training program must be "postsecondary" in nature. While having a high school diploma or high school equivalency credential need not be a prerequisite for the program to be considered "postsecondary", the training must be at a higher level than one would typically receive in high school (i.e., secondary education).

Third, the training must be "industry-recognized", and lead to a credential, certificate, or degree that would assist one in obtaining upgraded employment. In this regard, while there may be other sources of guidance that grantees may find useful to help them confirm whether a particular training program meets this test, grantees might consider guidance issued by the Department of Labor (DOL) in its Training and Employment Guidance Letter No. 15-10 (<http://wdr.doleta.gov/directives/attach/TEGL15-10.pdf>). In this letter, DOL defines an "industry-recognized credential" as one that either is developed and offered by, or endorsed by a nationally-recognized industry association or organization representing a sizeable portion of the industry sector, or a credential that is sought or accepted by companies within the industry sector for the purposes of hiring or recruitment. This letter also provides other useful considerations for determining the value of a career and technical education (CTE) program and the associated credentials, including the concepts of stackable, portable and accredited training.

Examples of qualifying placements could be a program in mechanics at a community college, a certificate program at a beauty school, or a program to obtain a license to be a commercial truck driver. As noted above, while an HSE or high school diploma does not need to be a pre-requisite for the training program to be considered "postsecondary," it is necessary that this training be at a higher level than one would receive in secondary education. One example of a training that would generally not qualify is CPR training provided by the American Red Cross. Such training is not postsecondary, as it is not training that is customarily of a higher level than one would receive in high school; furthermore, CPR training is often offered to students in high school or younger. Moreover, CPR training is also not a "program" in that it consists of an individual training class or session in one narrowly-targeted skill, rather than a sequence or aggregation of skills.

**H4. If HEP participants receive an HSE, and then are placed in courses in English as a Second Language (ESL) conducted at an IHE, are these placements considered to be qualifying placements in postsecondary education?**

It depends. Section 418A(b)(3)(B) of the HEA states that HEP projects are authorized to provide, "placement services designed to place students in a university, college, or junior college program..." Therefore, in order to be considered a qualifying postsecondary education placement, the classes or education program at an IHE, must be part of a "university, college, or junior college program." This means, for example, that enrollment in stand-alone ESL classes, which are run by a church or community organization that are not part of a degree or other

academic program, would not be qualifying placements. While such a placement may very well be beneficial to the student, given the requirements of the statute and regulations these classes must be in postsecondary education programs.

The ESL class may qualify, however, if it is part of such a postsecondary education (or a postsecondary training program). For example, if a student is placed in an IHE and, as part of the placement, is first enrolled in an ESL class, that ESL class would count as the first stage of the qualifying placement. The same is also true if the class could be considered part of a course of preparation for pursuing a degree at an IHE. Thus, the ESL class does not need to be credit-bearing, but it does need to be part of a postsecondary education (or training program), either as direct preparation for such a program or as part of the program itself, to be considered a qualifying placement for HEP.

#### **H5. How is “upgraded employment” defined for the purposes of HEP performance reporting?**

The regulations state in 34 CFR 206.10(b)(iii)(B) that HEP projects may deliver placement services designed to place students in a university, college, or junior college program (including preparation for college entrance examinations), or in military services or career positions. Consistent with the goal of placing students, as an option, in career positions, HEP projects may report students who have obtained “upgraded employment” as a qualifying placement for purposes of the HEP GPRA 2 measure. According to the HEP APR definitions, for a student to have attained upgraded employment, the student must have done at least one of the following:

- 1) Moved to a job that is both full-time and salaried, compared to job immediately prior to and/or during instructional services. This may be a job change with the same employer or a job with a new employer. OR
- 2) Moved to a job with increased benefits, such as healthcare, worker's compensation, unemployment insurance, social security, and vacation and sick leave, compared to job immediately prior to and/or during instructional services. This may be a job change with the same employer or a job with a new employer. OR
- 3) Obtained a position upgrade with same employer, such as a move to a supervisory position, compared to job at that employer immediately prior to and/or during instructional services. OR
- 4) Moved to a new job with predefined career ladder, regardless of wage change (e.g. management trainee, formal apprenticeship), compared to career ladder options at job immediately prior to and/or during instructional services. This may be a job change with the same employer or a job with a new employer. OR
- 5) Moved to a job with higher hourly wages compared to hourly wages at job immediately prior to and/or during instructional services. This may be a job change with the same employer or a job with a new employer. This category also accounts for students who obtain a job where they previously had been unemployed.

**H6. May a HEP project report placements in online training programs on the APR?**

Yes, provided that the online training program is an industry-recognized postsecondary vocational or career and technical education program, designed to lead to a credential, certificate, or degree that would assist one in obtaining upgraded employment. Online training programs must meet the same criteria applied to other training programs, as discussed above. (See question H3.)

**H7. May a HEP project report on the APR placements that take place outside of the United States?**

Yes. If HEP staff can document that the placement did occur, it may be reported as a qualifying placement provided that the other criteria for qualifying HEP placements are met. A credible self-attestation from the student that this placement occurred may be sufficient documentation to establish this.

**H8. Is there a limit on the amount of HEP funds that a HEP project may dedicate to placement of students who have achieved the equivalent of a high school diploma?**

No. While College Assistance Migrant Program (CAMP) grantees are required to provide follow-up services for project participants after they have completed their first year of college but are limited to 10 percent of funds awarded to these follow-up services (34 CFR 206.11), HEP grantees have no such limit. However, placement services for HEP students who have achieved their HSE must be reasonable, allowable, and aligned with the approved application, and should not detract from the primary focus of the program, which is for participants to obtain the equivalent of a high school diploma.

**H9. For how long after a project participant obtains his or her HSE should a project provide placement services to that student?**

It depends. While grantees should provide placement services tailored to assist project participants in entering postsecondary education, training, or upgraded employment (i.e., a qualifying HEP placement) as soon as possible, participants may either need additional time to take full advantage of these services or may not be able to benefit from the services for the foreseeable future. Therefore, grantees may offer placement services to those who have received their HSE so long as these services benefit these students and are cost effective. Grantees should stop providing these services whenever project staff, using their best professional judgment, determine that a student who has obtained his or her HSE is unable to benefit from these placement services.

In this regard, the HEP APR asks grantees to report on the placement status of their HSE attainers at any time after the HSE is attained but before the performance report is due for that same reporting period. As such, grantees may want to consider using the APR due date for the project year in which the student attained a HSE as a date for assessing whether it is reasonable to continue providing placement services to a student who has attained their HSE, but who has not yet secured an appropriate HEP placement. Grantees may find it reasonable to continue to

provide placement services after this point to some students who have obtained their HSE, but not for others. For example, a project might choose to continue providing placement services to a HSE completer who has not yet obtained a placement but has plans to begin a qualifying postsecondary education or training program soon. The project might also choose not to continue providing placement services to another student who has attained an HSE but has no immediate plans to begin a qualifying postsecondary education or training program.

**H10. May a HEP project provide direct financial support for an HSE attainer to participate in a postsecondary education or training program?**

No. HEP projects may not use HEP funds to provide direct financial support, such as paying for the tuition or fees of HSE attainers to participate in postsecondary education or training. Section 206.10(b) of the HEP regulations explicitly allows a HEP project to provide placement services designed to place students in postsecondary education or training, but does not permit HEP projects to use HEP funds to pay for those education and training placements once students are placed.

**II. Services to College Assistance Migrant Program (CAMP) Students**

**I. CAMP Services Overview**

**I1. What are the general categories of allowable services that a CAMP project may provide?**

In accordance with 34 CFR 206.10(a), a grantee may use CAMP funds to support approved projects designed to provide academic and supporting services and financial assistance to eligible participants as described in 34 CFR 206.3.

**I2. What types of services does section 206.10(b)(2) allow CAMP projects to provide?**

A CAMP project may provide the following types of services to assist the participants in meeting the project's objectives and in succeeding in an academic program of study at the IHE:

(i) Outreach and recruitment services to reach persons who are eligible under section 206.3 (a) and (c).

(ii) Supportive and instructional services to improve placement<sup>6</sup>, persistence, and retention in postsecondary education, including:

(A) Personal, academic, career economic education, or personal finance counseling as an ongoing part of the program;

(B) Tutoring and academic skill-building instruction and assistance;

(C) Assistance with special admissions;

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<sup>6</sup> Please note that in this context, “placement” refers to placement in higher education programs; in other words students beginning studies at an IHE.

(D) Health services; and

(E) Other services as necessary to assist students in completing program requirements.

(iii) Assistance in obtaining student financial aid that includes, but is not limited to, the following:

(A) Stipends.

(B) Scholarships.

(C) Student travel.

(D) Career-oriented work-study.

(E) Books and supplies.

(F) Tuition and fees.

(G) Room and board.

(H) Other assistance necessary to assist students in completing their first year of college or university.

(iv) Housing support for students living in institutional facilities and commuting students.

(v) Exposure to cultural events, academic programs, and other activities not usually available to migrant youth.

(vi) Internships.

(vii) Other essential supportive services (such as transportation and child care) as necessary to ensure the success of eligible students.

**I3. Where can grantees find more information on allowable CAMP recruitment services and CAMP eligibility?**

Grantees are encouraged to refer to the *HEP/CAMP Non-Regulatory Guidance on Recruitment and Eligibility*.

**J. Supportive and instructional services**

**J1. What are some examples of allowable CAMP supportive and instructional services in each of the categories from the regulations?**

Examples of allowable services in these categories include, but are not limited to:

- **Personal, academic, career, and economic education, or personal finance counseling as an ongoing part of the program:**

- Personal counseling consisting of project staff, other grantee personnel, or project community partners providing counseling to students on personal challenges such as family problems or stress involved in transitioning into higher education.
  - Academic counseling that enrolls students into the program and provides them with information on project expectations and a schedule of activities. This counseling might also involve working with students to develop an educational plan to choose the right classes, or choose a major, or plan a degree.
  - Career advising that involves administering a career inventory to help students consider where their strengths and interests are and what careers they would like to pursue. Career advising could also involve providing transportation for a student to visit a company or other job site in a field the student might be interested in or shadow an employee in such a field.
  - Economic education and personal finance counseling that involves general financial life skills, like managing a bank account or retirement and investment planning. This counseling might also focus on the economic and financial aspects of higher education, such as obtaining student financial aid or the responsible use of student loans.
- **Tutoring and academic skill-building instruction and assistance:**
    - An orientation program that presents students with strategies for college success;
    - Study skills workshops or seminars; subject area tutoring; fundamental skill-building, such as in reading, math, or English skills;
    - Use of institutional information systems to monitor and track student performance in courses and offering support where it is needed. Many projects provide students with an orientation before classes begin to ease their transition into higher education. Expenses of such activities, such as paying for transportation to the orientation and/or student housing for early arrival to participate in the orientation, would be allowable.
    - Peer tutoring or mentoring.
  - **Assistance with special admissions:** The CAMP regulations in 34 CFR 206.3(c)(1) state that, to be eligible to participate in the CAMP, a student must be enrolled or be admitted for enrollment as a full-time student at the participating IHE. However, in some cases, prospective CAMP students might not meet the IHE's admissions standards for the general student population; in those cases, the CAMP project may be able to work with the IHE to gain special, conditional, or provisional admissions for these students. Grantees should keep in mind that in these cases they should work closely with these students, providing the additional support that may be necessary for them to succeed at the IHE. Bringing students who are not able to succeed at the IHE, even with CAMP support, into a project may be detrimental to a project's students' successful completion of their first academic year at the IHE.

- **Health services:** These services may include working with students to ensure they are able to utilize health services available to students through the grantee’s IHE (e.g., a student health center or clinic); or paying the costs for these students to participate in the IHE’s student health plan. Projects may also provide other health services on an as-needed basis when the services are determined to be necessary to ensure the student’s participation in the CAMP project (see question M1 on the additional requirements for health services and financial support). For example, some students may need mental health services, such as those provided by a psychologist or psychiatrist, and CAMP projects could provide these services on an “as-needed” basis. Activities designed to promote healthy life choices for students could also fall under this category of services. Providing required immunizations for incoming students or vision screenings and glasses for students who need them are other possible examples of allowable health services.
- **Other services as necessary to assist students in completing program requirements:** This provision gives CAMP projects the flexibility to provide their students with supportive and instructional services that are not specifically identified here. One example of an “other” necessary service could be providing CAMP orientations to the parents and families of CAMP students to build familial support for students.

**K. Financial Support for CAMP Students**

**K1. What financial supports do the regulations allow CAMP projects to provide to their students?**

Under section 206.10(b)(2)(iii), CAMP projects are permitted to provide their students with assistance in obtaining student financial aid that includes, but is not limited to, the following:

- (A) Stipends.<sup>7</sup>
- (B) Scholarships.
- (C) Student travel.
- (D) Career-oriented work-study.
- (E) Books and supplies.
- (F) Tuition and fees.
- (G) Room and board.
- (H) Other assistance necessary to assist students in completing their first year of college or university.

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<sup>7</sup> Please note that regardless of how the financial support to CAMP students is defined or classified by the enrolling IHE (i.e. whether or not these are called “stipends”), all such direct financial support is to be reported in the “Training Stipends” category of the grantee’s ED 524 form and other budget documents submitted to the Department. Also, please remember that in budgeting for a project, stipends are not included in the calculation of indirect costs.

**K2. The CAMP regulations allow projects to provide CAMP students with “assistance in obtaining” financial aid. In addition to this assistance, may CAMP projects also provide their students with some degree of financial assistance directly from CAMP project funds?**

Yes. To assist their students in meeting the projects objectives and succeeding in an academic program of study at an IHE, CAMP projects may use CAMP funds to--

- Provide the forms of financial assistance identified in section 206.10(b)(2)(iii) (e.g., scholarships, stipends) directly to CAMP students where doing so (1) is necessary to ensure their participation in the CAMP project; and (2) does not detract, because of the amount, from the basic educational services the project provides. See section 206.10(c).

For such CAMP-supported financial assistance to be reasonable and necessary, a grantee would need to determine that the assistance is unavailable from the IHE or through regular forms of student financial assistance, i.e., where these other sources of assistance are not available.

- Provide CAMP students with housing support (see 34 CFR 206.10(b)(2)(iv)), which would constitute support for students' housing and food needs beyond "room and board" in IHE housing facilities (which is part of the allowable financial assistance listed in section 206.10(b)(2)(iii).

Given the cost of financial assistance per student, and the impact that using CAMP funds for financial assistance will have on the amount of CAMP funds a project has available for the educational and supportive services for all participants, grantees need to help CAMP students obtain other available sources of financial assistance before they consider using CAMP funds for this purpose.

**K3. What are stipends and how are they used?**

While the Department has no regulatory definition of the term “stipend”, for the purposes of the CAMP one may consider a stipend to be project funds provided directly to participating students, or on their behalf, to offset living or educational expenses that are not included in other financial support. Stipends should help to ensure the student’s continued participation in the project and ultimate completion of the first academic year of a program of study at the IHE. A stipend could, for example, be given to offset the cost of transportation to and from classes for a commuter student in a CAMP project, or to help the student purchase necessary books and supplies not otherwise provided by the project. A commuter CAMP project might also provide its students with a stipend to purchase meals while on campus for classes.

Only current CAMP students who are not beyond their first academic year at the IHE are eligible for stipends. Regardless of the purpose or amounts of a stipend, the project must have clear, established, and consistent internal policies for the distribution of stipends, as well as for the documentation of stipends being issued and received by students. Also, please note that all grantees should follow their institutions’ policies on payments to students and record-keeping when stipends are issued.



**K4. Is there a limit on the amount of a stipend or other form of financial assistance that may be paid or provided to a CAMP participant?**

No, however, the type and amount of any such support must be necessary and reasonable for the success of the project. Stipend amounts must also be consistent with what the grantee proposed in its approved application, unless the Department has given permission to reduce these amounts (see question K6 below).

In addition, per the HEP/CAMP regulations in section 206.10(c), financial support services (including stipends) are only allowable if they are necessary to ensure a student's participation in the CAMP project, and do not detract, because of the amount, from the basic educational services provided under the program (see question M1). For example, a project that proposed a specific level of direct classroom instruction in its approved application could not then divert so much money from other budget categories to financial support of students, such as stipends, that the remaining funds are insufficient to provide the approved level of instruction.

**K5. May stipends be used as incentives for student academic achievement or completion of the first academic year at the IHE?**

No. As noted in question K3 above, CAMP projects may only give stipends to students during their participation in the program. Therefore, a grantee may not hold a stipend and give it to a student only after successful completion of his or her first academic year of a program of study at an IHE. Additionally, as noted in question K4, stipends are allowable only to the extent that they are necessary to ensure a student's participation in the project. So, meeting unmet student needs and removing barriers to participation in the project are the required rationales for providing stipends to students participating in the program, not creating a financial incentive for increasing student achievement. CAMP grantees are certainly encouraged to employ effective practices for motivating students, but the use of stipends is not an appropriate means of doing so.

Please note also that projects may use student participation (e.g. the number or percentage of classes the student attends) to help determine stipend amounts; this kind of basis for calculating the amount of stipends would not constitute using stipends for incentives since the amount of stipend will vary based on participation levels. For example, a project could give a larger transportation stipend to students who attend class or CAMP activities more often, since those students would incur higher transportation costs.

**K6. May a CAMP project change the stipend amounts from the levels listed in its application?**

Yes, but Departmental approval is required for any reduction in that amount. According to EDGAR section 74.25(c)(7), grant recipients are required to request prior approval for the transfer of funds allotted for training allowances (direct payment to trainees) to other categories of expense. CAMP stipends are considered to be a training allowance, so any transfer of funds from this budget category to another budget category requires Departmental approval. However, there is no such prior approval requirement for grantees to transfer money into this budget category, (i.e. increase the amount). It is important to note that adjusting stipend amounts to reflect the circumstances of individual students or among various types of stipends (e.g., a commuter CAMP project taking money away from transportation stipends to increase the

amount students receive to help them buy their books) does not require prior approval. This is an adjustment in the distribution of stipends, but it does not represent a transfer of the overall funds allotted for stipends from that category to another budget category.

Additionally, when grantees increase (or decrease, with OME approval) the level of stipends through the annual revised budget, this adjusted level becomes the amount allotted for stipends; and therefore, any subsequent transfer of funds to other categories requires prior approval. (See 34 CFR 74.25(c)(7).)

**K7. What are some examples of student travel that a CAMP project could pay for with CAMP funds?**

CAMP projects may, for example, pay for current CAMP students at two-year or community colleges to visit four-year colleges and universities to explore further postsecondary education opportunities. CAMP projects could also assist in funding a CAMP student's travel expenses to attend educational or academic meetings and conferences. When determining if student travel would be an allowable expense, CAMP project staff should remember that such travel should support the general goals and objectives of the CAMP program, as well as the objectives from the approved application, and be necessary and reasonable for the student's success in the project. The student travel cannot be primarily for the purpose of leisure or entertainment, as entertainment activities are unallowable under the OMB Cost Principles.

**K8. The CAMP regulations in 34 CFR 206.10(b)(2)(iii)(D) mentions "career oriented work-study" as a type of student financial aid that grantees may assist their students in obtaining. What is an example of such career-oriented work-study?**

A CAMP project could, for example, facilitate the placement of a CAMP student who is interested in pursuing a science degree in a campus job as a laboratory assistant. The work-study placement would not necessarily have to be in the student's major or field of study (if the student has declared a major or field of student); however, it would only need to be "career-oriented" in the sense that it would expose the student to, or help to educate or train the student in, a certain career. A CAMP project may provide funds to support a work-study placement, or merely refer students to such a placement. Supporting a CAMP student in a career-oriented work-study placement might also include helping a student pay for transportation to the placement, or helping him or her purchase necessary items for the placement, such as professional attire. Please note that in this context career-oriented work-study might include federal work-study, but is not necessarily limited to that program.

**K9. As noted in the answer to K1, CAMP projects may provide students with "other assistance necessary to assist students in completing their first year of college or university." What does this assistance entail?**

CAMP projects have the flexibility to provide students with other forms of assistance that may not be specifically identified in section 206.10(b)(2), but is still necessary for the students to complete their first year of study at the IHE. These types of "other assistance" must be aligned with the purpose of the program, the objectives of the approved application, and the relevant OMB Cost Principles.

## **L. Other Allowable CAMP Activities**

### **L1. Which CAMP students are eligible for housing assistance?**

CAMP projects may provide housing assistance to all CAMP students. Under section 206.10(b)(2)(iii)(G), CAMP projects may assist students with room and board (commonly understood to be a part of living expenses). Additionally, section 206.10(b)(2)(iv) permits CAMP projects to provide housing support for students living in institutional facilities and for commuting students. In other words, where necessary and reasonable, CAMP projects may provide housing support to students living both on and off campus. This differs from HEP, which permits projects to provide housing only for those students enrolled in residential programs (see question D6).

### **L2. What cultural, academic, and other enrichment opportunities are CAMP projects able to provide to their students?**

Under section 206.10(b)(2)(v), CAMP projects may provide students with exposure to cultural events, academic programs, and other activities not usually available to migrant youth. Please note that in this context, “migrant youth” should be understood to mean both migrant and seasonal farmworkers, and members of their immediate family (i.e., those who may be eligible for the program).

CAMP project staff should ask questions such as the following in deciding if a potential activity would be allowable under this provision.

- First, is the potential activity aligned with the activities, goals, and objectives set out in the approved application?
- Second, is the potential activity reasonable, as defined in the relevant OMB Cost Principles (2 CFR part 200)?
- Third, can project staff members justify how these activities are primarily cultural, academic, or designed to expose students to activities not usually available to migrant youth, and not merely entertainment? Note: entertainment activities are generally unallowable under the Cost Principles.

If project staff can answer “yes” to all three questions, and adequately document the basis of their determinations, the activity would be allowable under section 206.10(b)(2)(v).

Examples of allowable activities in this category could include, but are not limited to: tours of other college campuses (e.g., taking students from a CAMP project at a community college to visit a four-year college or university), trips to the local theater to see a play, visits to zoos or aquariums, visits to local museums, or workshops on topics such as nutrition or personal finances. This might also include opportunities to participate in academic conferences, service learning activities, or leadership programs. Typically, these activities would be those that the average CAMP student would not have access to outside of their CAMP participation.

Regardless of the particular cultural, academic and other enrichment activities CAMP projects carry out, it is important that the project keep adequate records of the events and student participation in order to justify the use of CAMP funds for these services.

**L3. May CAMP funds be spent for food and refreshments provided to students during student activities or events?**

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

**L4. Section 206.10(b)(2)(vi) of the CAMP regulations states that projects may provide CAMP students with internships. What are ‘internships’ for purposes of CAMP projects?**

Pursuant to section 206.10(b)(2), projects may provide CAMP students with internships. One definition of the term that may be useful is that provided by the National Association of Colleges and Employers, which defines an “internship” as, “a form of experiential learning that integrates knowledge and theory learned in the classroom with practical application and skills development in a professional setting.” ([www.nacweb.org/about/membership/internship/](http://www.nacweb.org/about/membership/internship/)). This particular allowable activity refers to providing internship placements for current CAMP students to assist them in meeting the project's objectives and in succeeding in an academic program of study at the IHE. These internship placements could be with the CAMP project itself, at the IHE, or at another entity (e.g., a local business, State or local government, etc.). As such, they could also be funded by outside entities or by the CAMP project. These internships do not have to take place during the student’s first academic year. As follow-up services, they could take place, for example, in the summer after the first year or during the sophomore year. Please remember, however, that all follow-up services provided with CAMP funds to students beyond their first academic year at the IHE are subject to the 10-percent limit on funds that may be used for this purpose, and may not involve direct financial support.

If former CAMP or non-CAMP students work with CAMP projects as “interns,” these students may actually be employees. While this practice is allowable, these are not “internships” under section 206.10(b)(2)(vi), because the individuals in question are not qualifying CAMP students. Any “interns” who are not current CAMP students should be counted as employees and any funds paid to them reported on the “Personnel” line of the ED Form 524 budget report to the Department. While the institution may classify the compensation to these individuals as a “stipend” (e.g., a former CAMP student working with a project as a tutor receives a book stipend as compensation), for the purposes of the CAMP budget this is classified as personnel compensation.

**L5. What are some examples of “Other essential supportive services” that a CAMP project might provide to CAMP participants?**

Under section 206.10(b)(2)(vii), CAMP projects may provide their students with other essential supportive services (such as transportation and child care) that are necessary to ensure the success of eligible student participants. This support can either be delivered by providing students with a stipend to obtain these supportive services for themselves or providing these services directly to them. Services in this broad category might consist of, for example,

providing a shuttle or coordinating a carpool to help students get to campus, or arranging on-site childcare during classes for CAMP students with children. CAMP projects might also, for example, provide students with stipends to pay for travel to and from their home and campus at the beginning and end of the academic terms. For more information regarding using stipends to pay for student travel, see Questions K3 and K7, above.

**M. Additional Requirements for CAMP Services**

**M1. What requirements do the regulations in part 206 establish for health and financial support services to CAMP students?**

In accordance with section 206.10(c), the health services, and other financial support services provided to participating students must: (1) be necessary to ensure their participation in the CAMP; and (2) not detract, because of the amount, from the basic educational services provided under those programs. In other words, while these services are recognized as being important, their provision should not take away from the core purpose of the program, which is providing educational services designed to help students complete their first academic year of a program of study at an IHE.

**M2. What requirements exist for coordination of services by CAMP grantees?**

All CAMP applicants are required to provide an assurance in their grant application that they will develop and implement a plan for identifying and using the resources of the participating IHE and the community to supplement and enhance the services provided by the project (34 CFR 206.20(d)(2)). Once the applicant is awarded a grant, this plan must be clearly incorporated into the project's policies and procedures, to ensure that the project is not duplicating services already available at the IHE or in the community. For example, a CAMP grantee may coordinate with the IHE to facilitate the use of an existing campus computer lab by CAMP students for their homework, rather than establishing a separate lab for the CAMP project. An example of coordination with community resources might be referring CAMP students to a community health clinic that provides eye exams, rather than paying for the students to get these exams at a private provider. When coordinating services with IHEs and community partners, grantees may want to consider entering into MOUs with partner organizations to ensure that the terms of the services to be provided are clearly defined.

**M3. Must a CAMP grantee deliver its services to students exactly as specified in its approved application?**

Recipients of CAMP grants, like recipients of all other Department grants, are required to comply with applicable statutes, regulations, and approved applications, and to use Federal funds in accordance with those statutes, regulations and applications. (See 34 CFR Section 75.700 of EDGAR.) Thus, CAMP grantees are responsible for implementing their project activities in a manner that conforms to their approved application and any approved revisions. However, grantees do have some flexibility to alter their projects in order to improve them or to adapt their projects to changing circumstances. Grantees should refer to EDGAR section 74.25 for a list of changes that require prior approval from the Department's program officer. As a general rule, grantees should, at a minimum, inform their program officer of any significant change to project

services even if the change does not expressly require prior approval. Please note that other than in very limited circumstances, such as a sudden and significant reduction in program funding, the Department cannot agree to a reduction in the number of students the project is funded to serve, or to other key project objectives, such as the program's GPRA targets.

**N. CAMP Follow-up**

**N1. What is the purpose of the CAMP program beyond assisting participants in completing the first academic year of a program of study at the IHE?**

While the primary goal of the CAMP program is to assist students in completing the first academic year of a program of study at the IHE, the ultimate goal is for students to continue on in higher education and succeed in an academic program of study at the IHE (34 CFR 206.10(b)(2)). To that end, CAMP projects are required to provide follow-up services to project participants (34 CFR 206.11) (see question N4 below).

**N2. How are CAMP first academic year completers defined, for the purposes of the APR?**

Generally, these are CAMP students who were enrolled on a full-time basis at an IHE, and who complete the first academic year, as defined by the IHE in which the CAMP student is currently enrolled. For purposes of APR reporting, and as explained in the APR instructions, grantees also must adhere to the minimum standards for an academic year set forth in 34 CFR 668.3, which applies to the Pell program and Federal Student Aid (FSA). Section 668.3 states, in relevant part, that a full-time student in an undergraduate educational program is expected to complete at least: 24 semester or trimester credit-hours or 36 quarter credit-hours for a program measured in credit-hours; or 900 clock-hours for a program measured in clock-hours. The IHE's definition of an academic year being used by the CAMP project must at least meet this minimum standard.

**N3. How are Continuing CAMP First Academic Year Completers defined, for the purposes of the Annual Performance Report (APR)?**

The CAMP APR requires all CAMP grantees to report the unduplicated number of CAMP first academic year completers who continued in postsecondary education programs – i.e., “continuing CAMP first academic year completers”. The APR defines this term as those students who completed their first academic year of college in the budget period being reported, and who continued in postsecondary education programs. To be counted as continuing in postsecondary education, the student must re-enroll in an IHE for the academic year immediately following the one in which he or she is reported as being a first academic year completer, and must remain enrolled past either the date when students can no longer add courses, or a census date. The student does not necessarily have to re-enroll on a full-time basis. If the student does not enroll in an IHE in the subsequent academic year, he or she cannot be reported on the APR as continuing in postsecondary education, even if the student does ultimately continue on in higher education at a later date.

Project staff should keep in mind that, while it is necessary for a student to be enrolled at the grantee IHE to be counted as a first-year completer, after the student has completed the first

academic year of a program of study, the student can be counted as a continuing student if he or she enrolls in any IHE and remains enrolled past either the date when students can no longer add courses, or a census date. For example, if a student completes his or her first academic year at a community college, then transfers to a university and remains enrolled past the date when students can no longer add courses, or a census date, he or she may be reported as a continuing CAMP first academic year completer by the CAMP project in which he or she completed her first academic year.

**N4. What types of services must CAMP projects provide to project participants after they have completed their first year of college?**

Under section 206.11, CAMP projects must use not more than 10 percent of their grant to provide follow-up services for project participants after they have completed their first year of college. These follow-up services may include:

- (1) Monitoring and reporting the academic progress of students who participated in the project during their first year of college and their subsequent years in college;
- (2) Referring these students to on- or off-campus providers of counseling services, academic assistance, or financial aid, and coordinating those services, assistance, and aid with other non-program services, assistance, and aid, including services, assistance, and aid provided by community-based organizations, which may include mentoring and guidance; and
- (3) For students attending two-year IHEs, encouraging the students to transfer to four-year IHEs, where appropriate, and monitoring the rate of transfer of those students.

**N5. What are some examples of these follow-up services?**

Examples of allowable follow-up services for project participants after they have completed their first year of college include, but are not limited to, the following:

- **Monitoring and reporting academic progress:** Projects might use an IHE data system, project database, or the National Student Clearinghouse ([www.studentclearinghouse.org](http://www.studentclearinghouse.org)) to monitor and report the academic progress of former CAMP students as they continue in higher education. Other tools, such as social networking sites and informal follow-up contacts such as calls or emails may also be useful. Projects are required to report the unduplicated number of CAMP first academic year completers who continued in postsecondary education programs on their APR, so this monitoring is essential for accurate reporting. Conducting this monitoring on a longer term basis (e.g. up to degree completion) can help projects gain a better understanding of their long-term effectiveness, as reflected in the graduation rates of former CAMP students.
- **Referrals:** Moving beyond the support network of CAMP may be challenging for some students, so projects should work to extend this support network outside of the CAMP project. For example, CAMP project staff may refer students to on-campus tutoring or counseling centers that can fulfill some of the roles formerly provided by the CAMP project for the students. Facilitating these referrals may also involve providing

professional development to non-CAMP IHE staff on working effectively with CAMP students. A CAMP project might also find it useful to arrange presentations by various IHE offices and organizations to CAMP students to build familiarity with these resources. Working with students to help them access continuing financial aid may also be an important part of a successful follow-up strategy.

- **Encouraging transfer from two-year institutions to four-year institutions, where appropriate:** Transferring from a two-year to a four-year IHE may not be appropriate for all students based on their academic goals and personal circumstances; however, where it is appropriate, CAMP projects should work with students to facilitate this transfer. Establishing points of contact at four-year IHEs for transferring students and helping them build relationships with staff at those institutions is one method of encouraging and facilitating this transfer. Taking students to visit four-year IHEs to familiarize them with these institutions may also be helpful. Projects at two-year colleges might also provide academic counseling to help students plan and prepare for a transfer and to choose majors or courses of study at a new IHE (e.g. developing an academic plan for the student).

While CAMP follow-up services are not limited to those examples, it is important that the follow-up services delivered to former CAMP students represent a continuation (or follow-up) of services designed to help them transition to a second year of postsecondary education and continue to be successful in higher education. Direct financial support using CAMP funds (e.g., stipends) are not allowable as follow-up services. In addition, as with all project services, follow-up services for former CAMP students must be reasonable, allowable, and aligned with the approved application and program objectives.

**N6. Are follow-up services the only services that can be provided to former CAMP students after they have completed their first academic year at the IHE?**

Yes. The CAMP regulations in 34 CFR 206.10(b)(2) list the allowable services (including follow-up services) for students who are eligible for and participate in CAMP projects; furthermore, pursuant to section 206.3(c)(2), one key eligibility requirement for CAMP participants is that they not be beyond the first academic year of a program of study at the IHE. The one exception the CAMP statute and regulations offer for participants beyond their first year at an IHE is in the area of follow-up services, which are limited to no more than ten percent of the funds awarded to a CAMP grantee. See 34 CFR 206.11(c).

**N7. Is there a limit on the amount of CAMP funds that a CAMP grantee may dedicate to follow-up services for project participants after they have completed their first year of college?**

Yes. CAMP grantees may not use more than ten percent of funds awarded to them for follow-up services. Additionally, as with all project services, follow-up services for former CAMP students must be reasonable, allowable, and aligned with the approved application and program objectives.



**N8. For how long after CAMP students complete their first academic year should a CAMP project provide follow-up services?**

Each CAMP project should decide for itself what is the appropriate composition and timeline of follow-up services to former CAMP students after they complete their first academic year.

With regard to referrals and encouraging transfers from two-year to four-year institutions, CAMP projects may choose to provide these services to former CAMP students either while still enrolled in the IHE at which the CAMP program is housed, or only during the academic year immediately following completion of the first academic year. However, with regard to monitoring and reporting the academic progress of former CAMP students, projects should plan on continuing these activities throughout these students' involvement in undergraduate higher education. This is necessary for accurate performance reporting, given that projects are asked to report on numbers of CAMP first year completers who continue in higher education and complete an Associate's Degree or a Bachelor's Degree.

**N9. May a CAMP project use program funds to provide services to former CAMP students who have graduated from a college or university (i.e., to CAMP "alumnae")?**

No. Except for receipt of follow-up services, only current CAMP students are eligible for CAMP services.

Please note that some CAMP projects refer to students who have completed their CAMP year (i.e., first academic year at the IHE), but are currently enrolled at the IHE as upperclassmen as "CAMP alumnae." These students are still enrolled in their IHE program and, as noted in questions N4 and N5, CAMP projects must provide follow-up services to CAMP students (although not necessarily to each individual CAMP student) after they have completed their first year of college. This means that CAMP projects may deliver services using grant funds to these former CAMP students (i.e., CAMP alumnae) if those services are considered follow-up services (consistent with the requirements in 34 CFR 206.11).

Additionally, it is allowable for former CAMP students to act as mentors or tutors for current CAMP students. In this case, the former CAMP students are considered to be project personnel and are employed to deliver, rather than receive, project services. Compensation to these former CAMP students is pay (not stipend), and would be reported in the "personnel" category of the project's budget. Finally, including former CAMP students in recognition ceremonies or end-of-year celebrations for the CAMP project would also be allowable, particularly if these former CAMP students are being recognized for their service to current CAMP students.

**N10. May a CAMP projects deliver follow-up services to former CAMP completers of another project who transfer to the participating IHE?**

Yes. If a CAMP project is aware of a former CAMP student that has transferred to its IHE, the project may assist that student with follow-up services as described in 34 CFR 206.11 (e.g., tracking, referrals, assistance with transfers from two to four-year IHEs). In particular, CAMP projects are encouraged to assist each other in monitoring the continued academic success of

former CAMP students who might have transferred to their IHEs, and coordinate delivery of services to the students who have transferred.