

# ELIGIBILITY, DATA MANAGEMENT, AND GRANT ADMINISTRATION CLOSEOUTS

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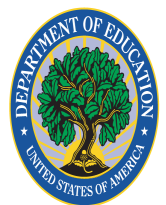
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The mission of the Office of Migrant Education is to provide excellent leadership, technical assistance, and financial support to improve the educational opportunities and academic success of migratory children, youth, agricultural workers, fishers, and their families.

**2023** OFFICE OF MIGRANT EDUCATION  
**ANNUAL DIRECTORS'  
MEETING**



# ELIGIBILITY

# ELIGIBILITY STATUTORY AND ADMINISTRATIVE REQUIREMENTS

- Authorizing Program Statute: Section 418A of the Higher Education Act, as amended
- Program Regulations: 34 C.F.R. 206
- Education Department General Administrative Regulations: 34 C.F.R. 75
- Uniform Guidance: 2 C.F.R. 200

# TO BE ELIGIBLE TO PARTICIPATE IN A HEP OR CAMP PROJECT

- A person, or his or her immediate family member, must have spent a minimum of 75 days during the past 24 months as a migrant or seasonal farmworker

OR

- The person must have participated (with respect to HEP within the last 24 months), or be eligible to participate, in Migrant Education Program (MEP) or the National Farmworker Jobs Program (NFJP).

**Note: When qualifying under the 75/24 rule, the 75 days do not need to be continuous.**

Source: 34 C.F.R. §206.3

## ELIGIBILITY VIA MEP OR NFJP

- A Valid State MEP Certificate of Eligibility

**OR**

- Official Signed Letter or Official Documentation from State MEP  
**OR** Official Documentation from National Farmworkers Jobs Program
  - Documentation must verify that the potential student is eligible for the MEP or NFJP program or formerly participated (in the case of HEP, within the last 24 months)

Source: G5 & G6 HEP CAMP Recruitment and Eligibility Non-Regulatory Guidance

## ELIGIBILITY VIA MEP AND NFJP

- Programs should not make Migrant Education Program (MEP) or National Farmworkers Jobs Program (NFJP) eligibility determinations



Source: Eligibility Guidance Questions G4 & G9

# ADDITIONAL HEP ELIGIBILITY REQUIREMENTS

## Age

- Be 16 years of age or over, or beyond the age of compulsory school attendance in the State

## School Enrollment

- Not be currently enrolled in an elementary or secondary school

## School Completion

- Not have earned a secondary school diploma or its equivalent, satisfying the age factor

## Need

- Be determined by the grantee to need the academic and supporting services and financial assistance provided by the project

Source: 418A(b)(1) of the HEA and 34 CFR 206.3(b)

# ADDITIONAL CAMP ELIGIBILITY REQUIREMENTS

## IHE Admission

- Be enrolled or be admitted for enrollment as a full-time student at the participating IHE

## Status

- Have at least a 'qualified alien' status

## First Year

- Not be beyond the first academic year of a program of study at the IHE, as determined under the standards of the IHE

## Need

- Be determined by the grantee to need the academic and supporting services and financial assistance provided by the project



## HEP - DETERMINING ACADEMIC, SUPPORTING-SERVICE, AND FINANCIAL-ASSISTANCE NEEDS

- Academic and Supporting Service: May use correspondence with teachers and counselors, student records and transcripts, and interviews with prospective students and their families.
- Most HEP projects tend to use a standard placement test to determine the academic skill level and potential academic needs of their incoming students.
- Financial Need: May use worker's pay stubs or W-2 forms may be used to determine financial need.

Source: Eligibility Guidance Question C2

## **CAMP – DETERMINING ACADEMIC, SUPPORTING-SERVICE, AND FINANCIAL-ASSISTANCE NEEDS**

- Academic and Supporting Service: May use correspondence with teachers and counselors, student records and transcripts, and interviews with prospective students and their families.
- Using the Free Application for Federal Student Aid (FAFSA) is a commonly used tool to determine financial need throughout post-secondary education.

Source: Eligibility Guidance Question C3

## DEFINITIONS – MIGRANT AND SEASONAL FARMWORKER

### Seasonal Farmworker

- A person whose primary employment was in farmwork on a temporary or seasonal basis (that is, not a constant year-round activity) for a period of at least 75 days within the past 24 months.

### Migrant Farmworker

- A person whose primary employment was in farmwork on a temporary or seasonal basis (that is, not a constant year-round activity) for a period of at least 75 days within the past 24 months.

Source: 34 C.F.R. 206.5(c)

## DEFINITION – PRIMARY EMPLOYMENT

- **Primary employment:** Means that for a period of at least 75 days in the past 24 months, temporary or seasonal employment in migrant or seasonal farmwork is the **principal, but not necessarily the sole,** means of support for the worker or his or her immediate family.
- **Seasonal employment:** Is employment that occurs only during a certain period of the year because of the cycles of nature and that is not constant year-round employment.
- **Temporary employment:** Is employment that lasts for a limited period of time, usually a few months, but is not constant year-round employment.

Source: Eligibility Guidance Question E1, E2, & F1

# DEFINITIONS – FARMWORK AND AGRICULTURAL ACTIVITIES

What do we mean by Farmwork?

- **Any agricultural activity**, performed for either **wages or personal subsistence**, on a farm, ranch, or similar establishment.

What are agricultural activities?

- Any activity directly related to the **production** of crops, dairy products, poultry, or livestock;
- Any activity directly related to the **cultivation or harvesting** of trees; or
- Any activity directly related to fish farms.

Source: 34 C.F.R. 206.5(c)

## DEFINITIONS – AGRICULTURAL ACTIVITIES, CONT.

- **Crop:** The Department considers a crop to be a plant that is harvested for use by people or by livestock.
- **Dairy Product:** Is **restricted to the production** of milk.
  - Other items commonly referred to as “dairy products,” such as cheese or yogurt, are processed -- not produced.
- **Poultry:** refer to any bird produced and used primarily for meat or egg production.
- **Livestock:** Any animal produced or kept primarily for breeding or slaughter, including, but not limited to, beef and dairy cattle, hogs, sheep, goats, and horses.

Source: Eligibility Guidance Question D9, D10, D11, & D12

## PAIR AND SHARE

- Would orchids grown on a farm be considered a crop in the Department's definition of agricultural activity?

## PAIR AND SHARE CONTINUED

- Would orchids be considered a crop in the Department's definition of agricultural activity?
- Yes, orchids, and other plants grown on a farm or similar establishment are considered a crop within the definition of agricultural activity.
- The Department considers a crop to be a plant that is harvested for use by people or by livestock.
- In this definition of crop the Department does not specify what constitutes use.

Source: 34 CFR 206



## DOCUMENTING ELIGIBILITY

- Projects must maintain adequate documentation for each person whom they enroll in their project so that they can confirm that the person met all program eligibility requirements.
- Projects are encouraged to develop their own form and procedures for maintaining this information.
- Project-specific documentation should be used in conjunction with MEP or NFJP eligibility forms, where possible, for those participants who qualify for services under either of these programs.

Source: Eligibility Guidance Question I1.

# CASE STUDY SCENARIOS

## **CASE STUDY: QUALIFYING WORK - BUILDING A BARN FOR LIVESTOCK**

- A prospective student has worked 75 days in the past 24 months building a barn for livestock on their employer's farm
- The barn was necessary to house livestock for the production of meat
- The work completed was seasonal and was the primary source of employment for the prospective student

**Assuming all other eligibility criteria are met, would the student be eligible based on the type of work performed?**

## CASE STUDY: QUALIFYING WORK - BUILDING A BARN FOR LIVESTOCK

- Individual does not meet the general eligibility requirements for qualifying work.
- HEP and CAMP regulations (34 CFR 206) define agricultural activity as:
  - (i) Any activity directly related to the production of crops, dairy products, poultry, or livestock;
  - (ii) Any activity directly related to the cultivation or harvesting of trees; or
  - (iii) Any activity directly related to fish farms.

## CASE STUDY: QUALIFYING WORK - BUILDING A BARN FOR LIVESTOCK CONTINUED

- Building a barn for a livestock farm business is not directly related to the production of livestock.
- The Department considers the production of livestock to involve raising and taking care of animals that are produced or kept primarily for breeding or slaughter.
- Such work includes, but is not limited to: herding, handling, feeding, watering, milking, caring for, branding, tagging, and assisting in the raising of livestock.

# RESOURCES

- This presentation
- Additional information on HEP and CAMP:
  - Non-Regulatory Guidance on Recruitment and Eligibility Guidance
  - Non-Regulatory Guidance on Allowable Services to HEP and CAMP Students
  - Program regulations
- Please also feel free reach out to your Program Officer with any eligibility questions

## College Assistance Migrant Program

Performance Reporting and Evaluation

Applicant Information

Eligibility

Awards

Funding Status

Legislation, Regulations, and Guidance

Performance

Resources

Contacts

# QUESTIONS

# DATA MANAGEMENT



# OVERVIEW


- Introduction
- Authorities
- Types of Reporting
- Annual Performance Report (APR)
- Interim Performance Report (IPR)
- Submission Process
- Next Steps
- Helpful Reminders
- Questions
- Activity

# INTRODUCTION


- Understanding the reporting process and proactively managing your data help you better understand:
  - The details of your data
    - Timeliness, completeness, accuracy, accessibility
  - Procedures and Standards
  - Preservation and Documentation
  - Verification

# AUTHORITIES

Higher Education Act of 1965 – Section 418A as amended by Section 408 of the Higher Education Opportunity Act (HEOA), P.L. 110-315

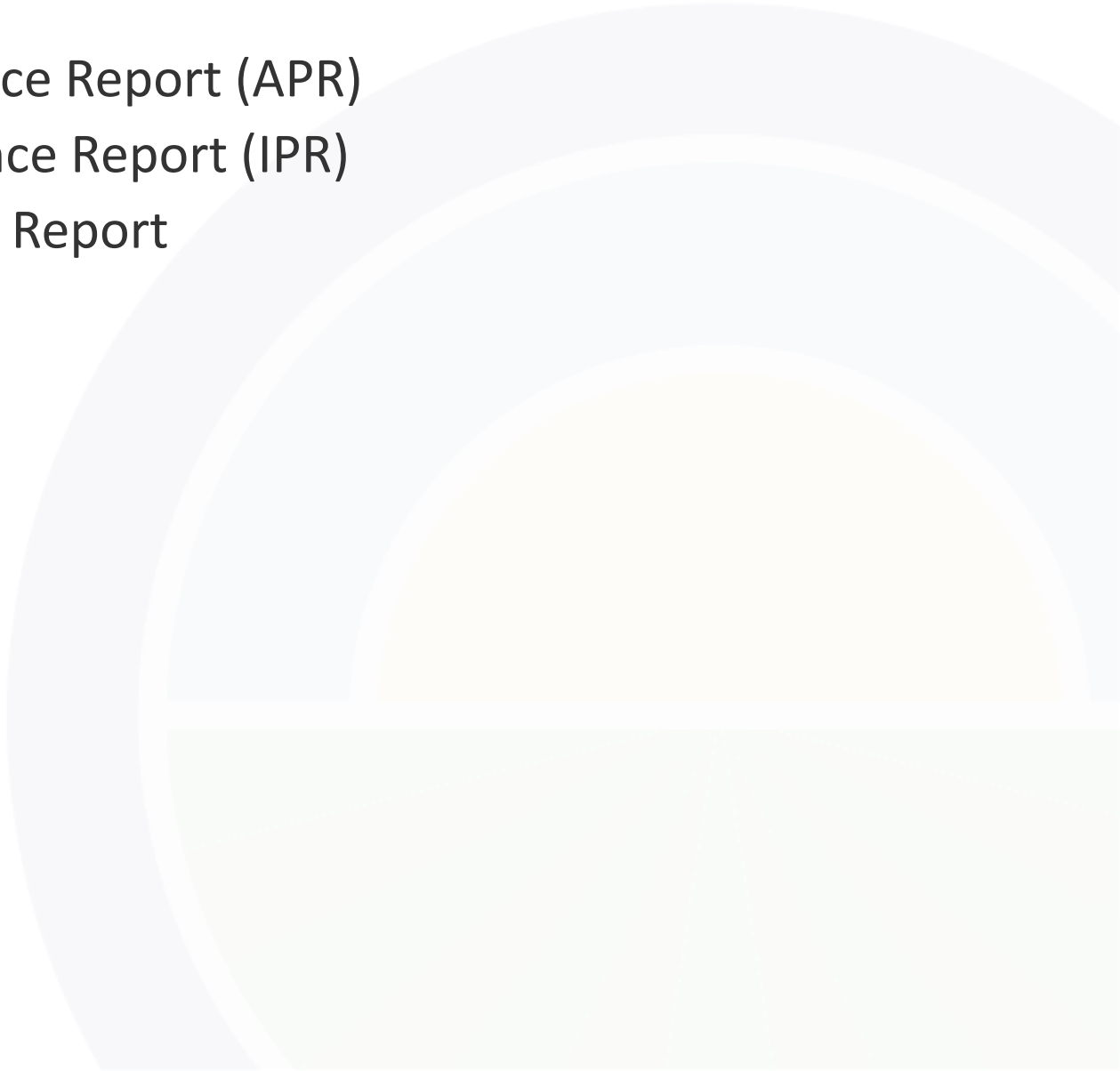


Education Department General Administrative Regulations (EDGAR), 34 CFR 75.118



College Assistance Migrant Program and High School Equivalency Program Annual Performance Report and Final Report Instructions (OMB No. 1810-0727)

# TYPES OF REPORTING

- Annual Performance Report (APR)
  - Interim Performance Report (IPR)
  - Final Performance Report
- 
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# THE APR

A report a grantee must submit to receive continued funding under a multi-year award. The report provides the most current performance and financial information about a discretionary grant or cooperative agreement (see EDGAR § 75.118).

## APR REPORTING

- Performance Period
- Number Funded
- Number Served
- New Students
- Returning Students
- Completers/Attainers
- Placed/Continued Postsecondary Education
- Withdrawals
- Persisters
- Project Goals and Objectives
- Services
- Project Model
- Student Assessment
- Financial Data

# 2022 ANNUAL PERFORMANCE REPORT (APR) REPORTING PERIOD

- The APR Reporting Period is aligned with the 12-month current budget period: **July 1, 2022 – June 30, 2023**
- Due Date: Your final version of the APR must be submitted by **Thursday, November 9, 2023.**
- Due Date: The Final Performance Report must be submitted by **Monday, October 30, 2023.** If you receive a no-cost time extension from ED for the fifth year of this grant, the Final Performance Report is due 120 days after the revised project period end date.

## THE IPR

- Required for:
  - all new projects in the first budget year
  - projects that have not made substantial progress in a previous budget period.



# IPR REPORTING

- Budget Period/Reporting Period
- Number Funded
- Number Served
- New Student
- Returning student
- Completers
- Continuing Students
- Attainers
- Persisters
- Withdrawals
- Placed/Continued Postsecondary Education
- Project Goals and Objectives

# INTERIM PERFORMANCE REPORT (IPR) REPORTING PERIOD

**For new projects (FY23 cohort) and those projects that were notified of not making substantial progress for FY2021-22:**

- The IPR Reporting Period is a 7-month period: **July 1, 2023 – January 26, 2024**
- Due Date: Your final version of the IPR must be submitted by **Thursday, February 8, 2024.**

# SUBMISSION PROCESS

**1**  
Performance  
Report Data  
Form (MS  
Excel)



**1** Cover  
Sheet Form  
(MS Word)



**Two attachments in  
one email to:  
hepcampAPR@ed.gov**

# NEXT STEPS: APR REPORTING

## Save the Dates:

- APR Webinar: **Monday, September 11** (1 – 2:30 PM ET)
- APR Office Hours: **Wednesday, October 11** (12:30 – 2:30 PM ET)

OME will release the APR forms via the HEP CAMP listserv and G5 in mid-August.



# QUESTIONS

# APR ACTIVITY

**Instructions:** In groups of four to five, identify the two discrepancies in Block A of the CAMP APR Data Form below.

**Note:** According to the original application, the number funded to be served is 35 students.

Reporting Block, Item A1	Reporting Block A1 Item	Reporting Block A1 Response
<b>A1.</b>	<b>Number of students served during the reporting period.</b>	
A1.a.	Number <b>funded</b> to be served.	40
A1.b.	Number <b>served</b> in college courses (note: A1b1 + A1b2 should sum to equal A1b).	35
A1.b.1.	Number served who were <b>new participants</b> (first academic year in CAMP) (subset of A1b).	34
A1.b.2.	Number served who were <b>returning participants</b> (not first academic year in CAMP) (subset of A1b).	1
Reporting Block, Item A2	Reporting Block A2 Item	Reporting Block A2 Response
<b>A2.</b>	<b>Status at the end of the reporting period. (Note: A2a-c should sum to equal the number reported in A1b (number served)).</b>	
A2.a.	Number of CAMP first academic year <b>completers. (Obj. 1 National Target: 86%) (GPRA 1)</b> *Supporting documentation required. See instructions for item A2.	29
A2.b.	Number of <b>withdrawals.</b>	5
A2.c.	Number of <b>persisters</b> (came back to continue in the subsequent budget period; persisters were enrolled in instructional services in the current reporting period but did not yet complete their first academic year of college and have returned in the subsequent budget period to continue instructional services).	2
	Your data input accuracy result	Please check



# SOLUTION

**Note:** According to the original application, the number funded to be served is 35 students.

Reporting Block, Item A1	Reporting Block A1 Item	Reporting Block A1 Response
<b>A1.</b>	<b>Number of students served during the reporting period.</b>	
A1.a.	Number <b>funded</b> to be served.	40
A1.b.	Number <b>served</b> in college courses (note: A1b1 + A1b2 should sum to equal A1b).	35
A1.b.1.	Number served who were <b>new participants</b> (first academic year in CAMP) (subset of A1b).	34
A1.b.2.	Number served who were <b>returning participants</b> (not first academic year in CAMP) (subset of A1b).	1
Reporting Block, Item A2	Reporting Block A2 Item	Reporting Block A2 Response
<b>A2.</b>	<b>Status at the end of the reporting period. (Note: A2a-c should sum to equal the number reported in A1b (number served)).</b>	
A2.a.	Number of CAMP first academic year <b>completers. (Obj. 1 National Target: 86%) (GPRA 1)</b> *Supporting documentation required. See instructions for item A2.	29
A2.b.	Number of <b>withdrawals</b> .	5
A2.c.	Number of <b>persisters</b> (came back to continue in the subsequent budget period; persisters were enrolled in instructional services in the current reporting period but did not yet complete their first academic year of college and have returned in the subsequent budget period to continue instructional services).	2
	Your data input accuracy result	Please check

# **HEP AND CAMP GRANT ADMINISTRATION CLOSEOUTS**

## NO COST EXTENSION

- **When may funds be used?**
- Grantees may initiate a one-time extension of the final budget period to be used on uncompleted activities within the scope and objectives of the grant.
  
- **When may funds not be used?**
- If all project activities have been completed, funds are not used to merely spend unobligated balances.

## ACTIVITIES TO BE COMPLETED DURING NO COST EXTENSION

- Completing the final grant performance report, which is due within **120** days after the expiration date of the grant.
- Completing the evaluation and the final report.
- Completing specified project objectives listed in the application, which may include **recruiting and serving students** as approved in the grantee's application, providing follow-up and placement services, completing fifth-year or other activities in the approved application.

Source: 2 CFR 200.308

## REPORTING REMINDER

- *Please review G5 when submitting your final report to ensure the figures in the final report and the final balance in G5 match.*

## CLOSEOUTS – NO REMAINING FUNDS

- When the project has a “0” balance or less than 10 percent of the Federal funds awarded remaining on the grant:
- OME will send the project a Notification of Closeout Letter. This letter informs the grantee of the status of their award and serves to remind them of the record retention requirements in 2 CFR 200.333.

Source: 2 CFR 200.333

## CLOSEOUTS - REMAINING FUNDS

- If the project has 10 percent or more of the Federal funds awarded remaining on the grant, the following steps take place:
- OME will contact the project before de-obligating the funds.
- OME will request confirmation from the project verifying that the funds are not needed, and that all the financial obligations of the grant have been met.
- The project's certifying official should respond to confirm.

## RECORD KEEPING

Keep records regarding the use of grant funds for at least 3 years after the project ends or after all actions of the grant are closed.

Source: 2 CFR 200.333



## CLOSEOUT – TRANSFERRING SUPPLIES

- **What happens to the supplies if the project receives a new HEP or CAMP award?**
- Transfer laptops, file cabinets, chairs, desks, etc. to any new HEP or CAMP project or to another Federal award to promote fiscal responsibility and build capacity for the new project.

Source: 2 CFR 200.314

## CLOSEOUT - SUPPLIES

- **What happens to the supplies if the project does not receive a new HEP or CAMP award?**
- If the current total aggregate value of the supplies exceeds \$5,000 and the supplies are not needed for your project, but are needed for another Federal project, then:
- The non-Federal entity must transfer the supplies to another Federally-funded project within the state – for example, an Institution of Higher Education (IHE) HEP/ CAMP project or a MEP project in the state.

Source: 2 CFR 200.314

## CLOSEOUT – SUPPLIES CONTINUED

- **If the current total aggregate value of the supplies exceeds \$5,000 and the supplies are not needed for your project or for any other Federal project, then:**
- If the project determines that it no longer needs supplies it acquired under the grant it must reimburse the U.S. Department of Education for those supplies if the total aggregate value of the inventory of supplies exceeds \$5,000. The non-Federal entity must retain the supplies for use on other activities or sell them, but must, in either case, compensate the Federal Government for its share.

# QUESTIONS



THANK YOU!

