

Foundations of HEP and CAMP – Eligibility, Data and Fiscal Management, and Grant Administration

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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.

2024 OFFICE OF MIGRANT EDUCATION
HEP and CAMP
New Directors' Orientation



Agenda

Today, we will review
the following foundational topics:

- Eligibility,
- Data management,
- Fiscal management, and
- Grant administration for closeout.

We will provide time for questions following each segment.

Scavenger Hunt

During the presentation, keep an eye out for the answers to these questions (you can use resources mentioned):

1. Is there an OME form for documenting eligibility?
2. What is the definition of a HEP or CAMP “persister”?
3. What is HEP Program Performance Measure 1?
4. What is the purpose of a training stipend?
5. What is an example of a training stipend?
6. For how many years must records be retained following the submission of the final performance report?

A close-up photograph of a black graduation cap with a gold tassel. The cap is positioned in the upper right corner, and the tassel hangs down towards the bottom right. The background is a dark, textured surface, likely the graduation gown. The word "ELIGIBILITY" is centered in the middle of the image in a bold, white, sans-serif font. Below the text is a thin, white, wavy horizontal line.

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

– General Requirement

- 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 the 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

MEP and NFJP DOCUMENTATION VERIFYING CURRENT ELIGIBILITY OR FORMERLY PARTICIPATED (WITHIN 24 MONTHS HEP)

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

Source: Eligibility Guidance Questions G5 & G6

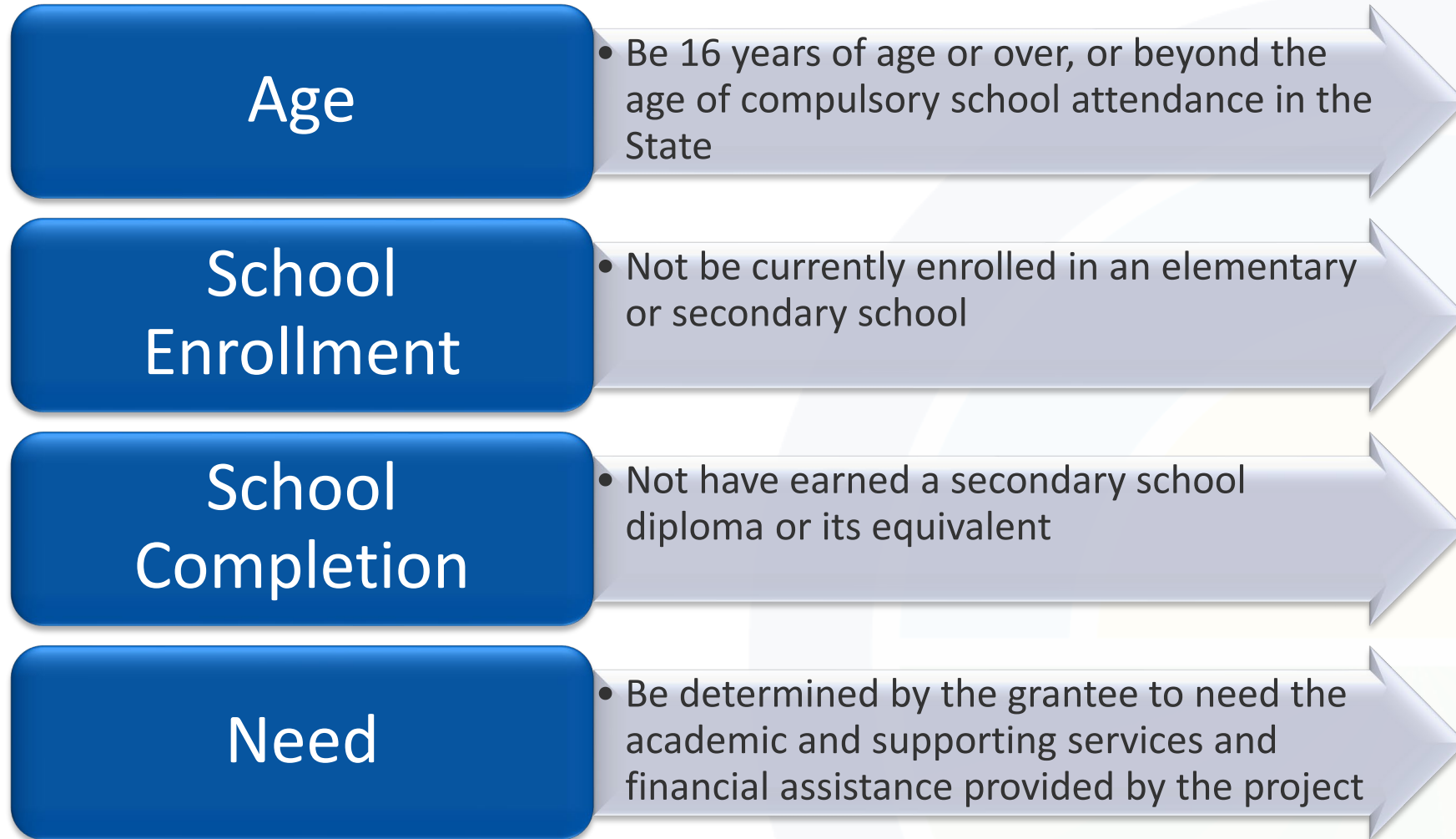
Eligibility Via MEP and NFJP

- Programs should not make Migrant Education Program (MEP) or National Farmworkers Jobs Program (NFJP) eligibility determinations.
- Programs should rely on documentation of eligibility provided by the respective program.



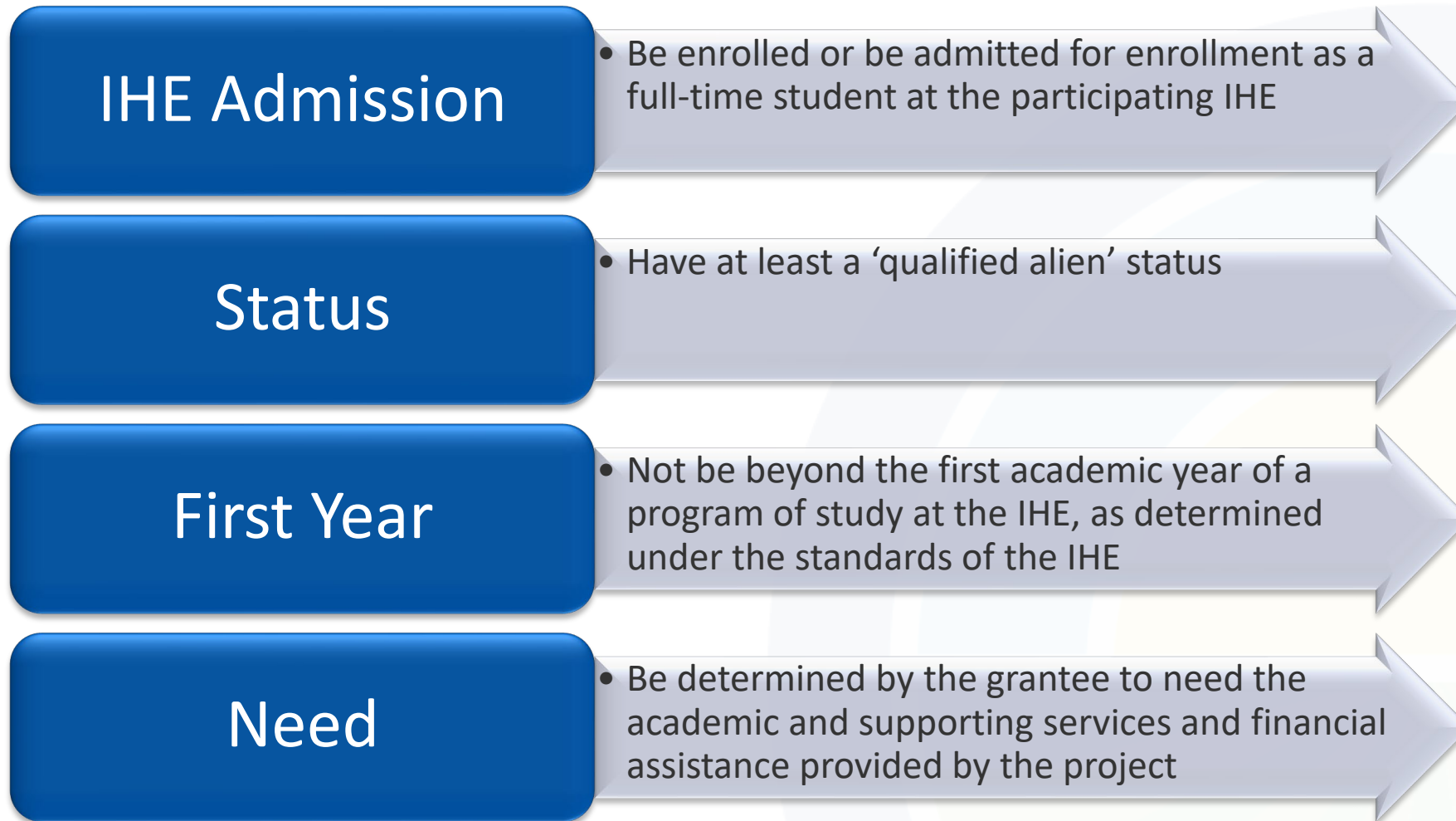
Source: Eligibility Guidance Questions G4 & G9

Additional HEP Eligibility Requirements



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

Additional CAMP Eligibility Requirements



Source: 418A(b)(1) of the HEA, 34 CFR § 206.3(c), Eligibility Guidance Question H6

Pair and Share – 1

- Is a valid State MEP Certificate of Eligibility (COE) on its own sufficient for establishing and documenting HEP/CAMP eligibility? Why or why not?

Documenting Eligibility

- A valid State MEP COE is not sufficient on its own for establishing and documenting HEP/CAMP 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, including financial and academic need.
- While there is not OME specific form, projects are encouraged to develop their own forms 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

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 seasonal farmworker whose employment required travel that precluded the farmworker from returning to their permanent place of residence within the same day.

Source: 34 C.F.R. § 206.5(c)

Pair and Share - 2

- From what date should a project count back to determine the 24-month period if qualifying under the 75/24 rule?



Answer to Pair and Share – 2

- From what date should a project count back to determine the 24-month period if qualifying under the 75/24 rule?
- A potential project participant cannot be considered a “participant” until after the project has determined the student to be eligible and has begun delivering services other than recruitment (e.g., instruction, tutoring, transportation assistance, or stipends) to the student.
- Therefore, the project should count back the 24 months from the date the student has begun, or will begin, receiving services other than recruitment.

Source: Eligibility Guidance Question 17

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 – Immediate Family Member

Immediate family member means one or more of the following:

- A spouse
- A parent, step-parent, adoptive parent, foster parent, or anyone with guardianship
- Any person who –
 - Claims the individual as a dependent on a Federal income tax return for either of the previous two years, or
 - Resides in the same household as the individual, supports that individual financially, and is a relative of that individual.

Source: 34 C.F.R. § 206.5(c)(5)

Case Scenario Discussion

Description of Scenario:

- Alex is a verified current HEP/CAMP student.
- While Alex did not meet the 75/24 eligibility requirement, Alex met the general eligibility requirement via a State MEP COE from 18 months ago.
- Alex lives with their parents and supports the parents financially.
- Alex's mother is interested in participating in the same HEP/CAMP program but does not meet the 75/24 rule.

Questions for Discussion:

- Based on the situation above and assuming the mother meets the program specific eligibility requirements, would she be eligible for the HEP/CAMP program due to being an immediate family member? Why or why not?
- What other information, if any, would be helpful to confirm eligibility?

Based on scenario, mother is ineligible because...

- 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 MEP or NFJP.
- The immediate family component only applies in the first situation.

Mother could have been eligible if...

- Alex were to have worked 75 days in the past 24 months as a migrant or seasonal farmworker;
- Lived with mother; and
- Supported mother financially while engaging in qualifying work.
- Met the additional program eligibility requirements.

Recommended Contacts for Grant Assistance

Regulations and Grant Management

- Program officer

Recruitment

- Local MEP recruiters and state MEP staff
- Local farmers

Budget Management

- Organization's budget officer or accountant

Services

- High school equivalency diploma (HSED) test administrator
- College/university registrar

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

Please feel free to raise your hand in person or virtually.

You may also enter your question(s) into this form. Office of Migrant Education staff will review and respond throughout the NDO and ADM.

Link: <https://forms.office.com/g/4TT7Rd6idM>



DATA MANAGEMENT



Overview

- Overview of HEP/CAMP Performance Reporting
- Annual Performance Report (APR)
- Interim Performance Report (IPR)
- Submission Process
- Next Steps
- Helpful Reminders



Poll

- Why should you collect and manage HEP and CAMP data from **Day 1 of implementing your project?**

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HEP/CAMP Data and Reporting

- Why collect and manage HEP and CAMP data from **Day 1**?
 - Track progress toward program goals and objectives
 - Identify discrepancies or missing information
 - Inform staff and protect against information loss with staff turnover
 - Demonstrate success and identify growth areas
 - On-time and accurate Performance Reports to OME
 - Set up the final project evaluation

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



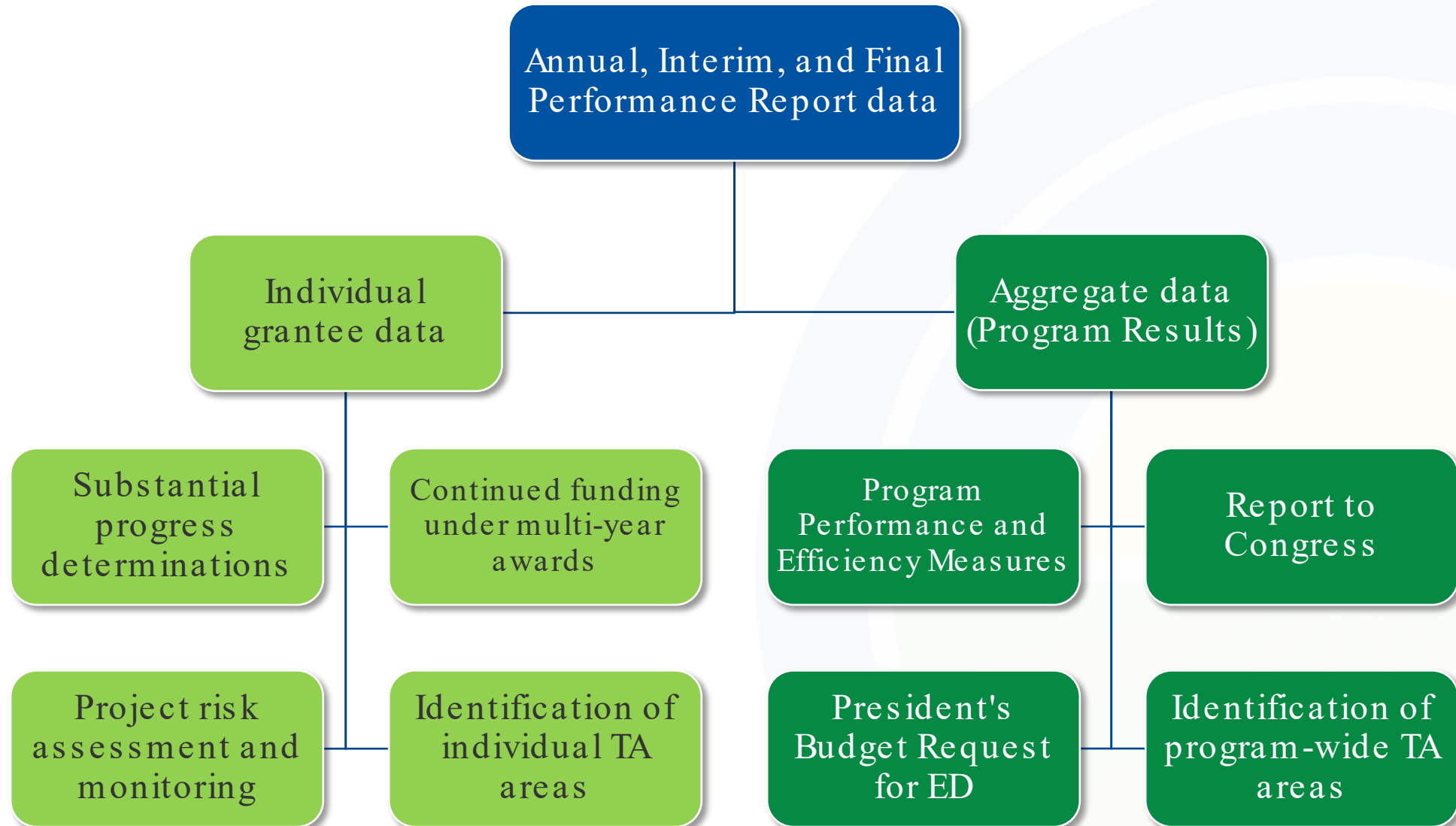
College Assistance Migrant Program and High School Equivalency Program Annual Performance Report and Final Report Instructions (OMB No. 1810-0727)

<https://oese.ed.gov/offices/office-of-migrant-education>

Types of Reporting

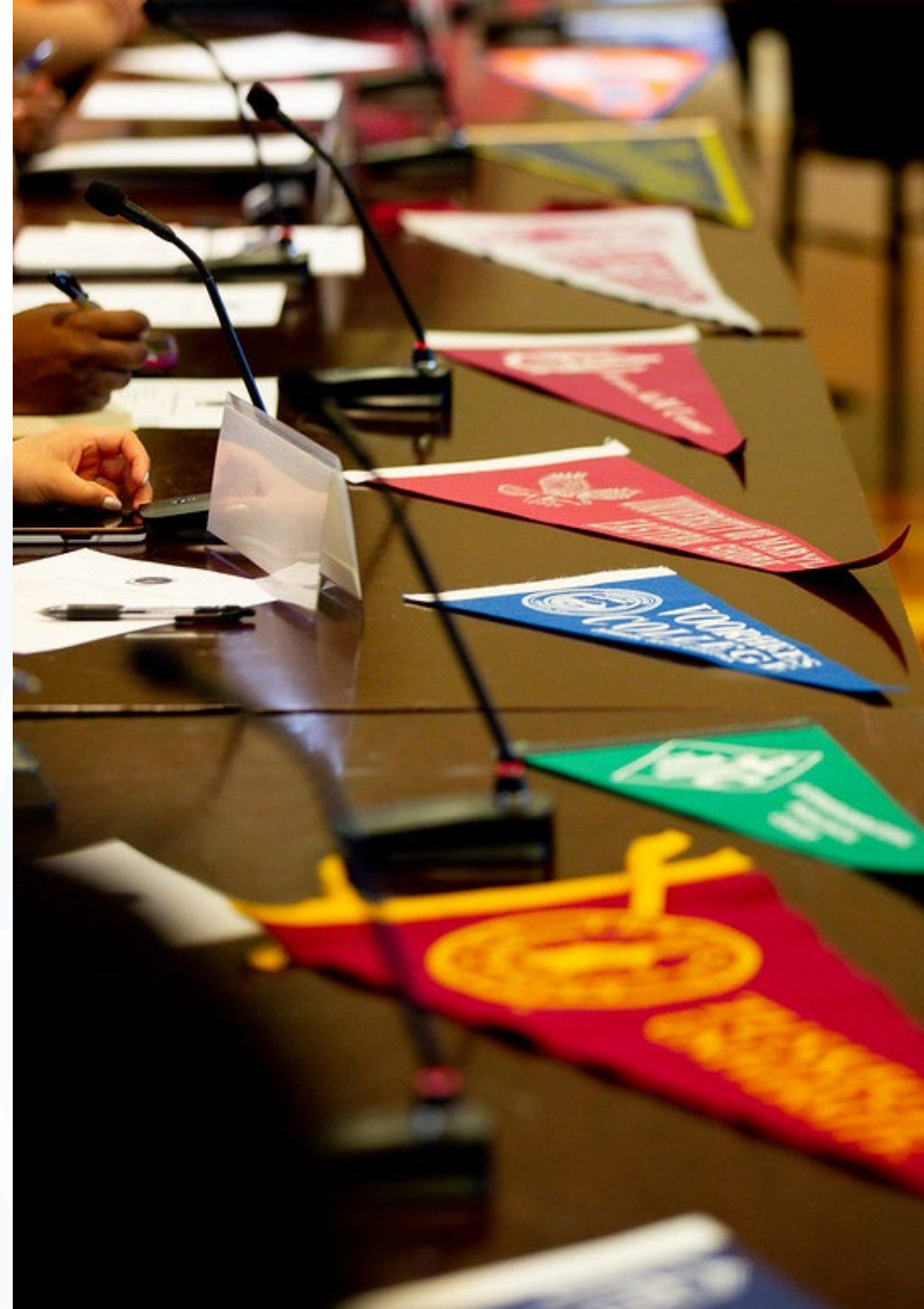
1. Annual Performance Report (APR)
2. Interim Performance Report (IPR)
3. Final Performance Report (FPR)
 - For reporting periods 2024-2025 and beyond, FPRs will also include the submission of your **final project evaluation**.
 - OME recommends beginning to prepare for the final project evaluation as soon as possible, ideally in year one, such as:
 - creating an evaluation project plan,
 - identifying additional/external data sources,
 - collecting additional data, etc.

What are Performance Report data used for?



Annual Performance Report (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 Definitions (From the APR Instructions)

- Performance Period
- Number Funded
- Number Served
- New Students
- Returning Students
- Attainers/Placed (HEP)
- Completers/Continued Postsecondary Education (CAMP)
- Withdrawals
- Persisters
- Project Goals and Objectives
- Project Services
- Project Model (Commuter/Residential students)
- **Instructional mode*** (In-person, Remote/Distance, Hybrid)
- Financial Data

*Optional for 2023-2024 Reporting Period

APR Due Dates

- The APR Reporting Period is aligned with the 12-month current budget period: **July 1, 2023 – June 30, 2024**
- Due Date: Your final version of the APR must be submitted by **Thursday, October 17, 2024.**

Interim Performance Report (IPR) Reporting Period

For new projects (FY24 cohort) and those projects that were notified of not making substantial progress for FY 2022-23:

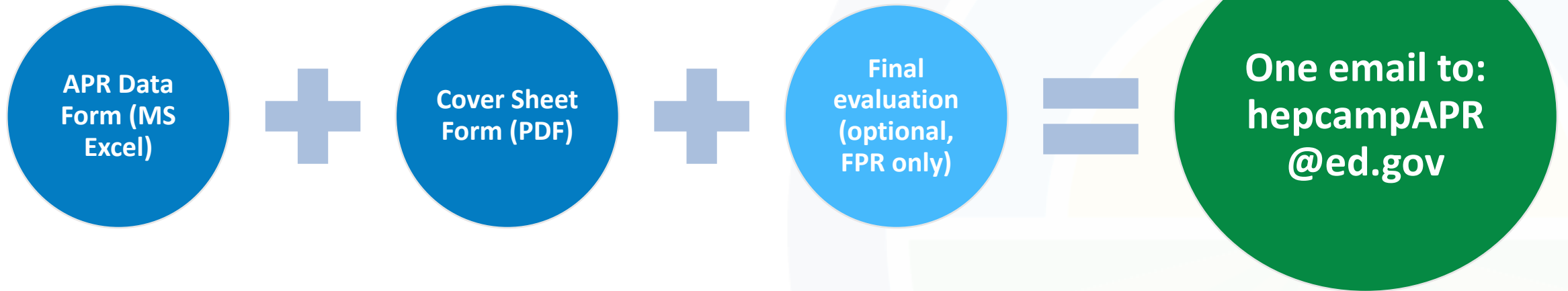
- The IPR Reporting Period is a 7-month period: **July 1, 2024 – January 24, 2025**
- Due Date: Your final version of the IPR must be submitted by **Thursday, February 6, 2025.**

IPR Reporting

- Budget Period/Reporting Period
- Number Funded
- Number Served
- New Student
- Returning student
- Attainers/Placed (HEP)
- Completers/Continuing Students (CAMP)
- Persisters
- Withdrawals
- Project Goals and Objectives



Submission Process



APR Timeline

- 2023-2024 APR Forms and Instructions will be shared:
 - OME website, listserv message, G5
- Grantees may begin submitting their APR forms any time.
- **Late August 2024:** OME will release a pre-recorded APR webinar available to view at any time.
- **September 12, 2024:** OME will host APR Office Hours to answer questions.
- **October 17, 2024:** Deadline to submit APR forms.

Reporting Resources

- **CAMP:** <https://oese.ed.gov/offices/office-of-migrant-education/college-assistance-migrant-program/performance-reporting-and-evaluation-college-assistance-migrant-program/>
- **HEP:** <https://oese.ed.gov/offices/office-of-migrant-education/high-school-equivalency-program/performance-report-and-evaluation-high-school-equivalency-program/>
- Under each program, click “Performance Reporting and Evaluation.”

Helpful Reminders

- Make sure you understand the definitions in the **APR Instructions**.
- Take advantage of the student workbook and new pre-submission checklist.
- Reach out with questions!

ADM Day 2: 11:00 am – 12:00 pm ET
Annual Performance Report (APR) Form Updates

Questions

Please feel free to raise your hand in person or virtually.

You may also enter your question(s) into this form. Office of Migrant Education staff will review and respond throughout the NDO and ADM.

Link: <https://forms.office.com/g/4TT7Rd6idM>



FISCAL MANAGEMENT



Resources for Managing Your Budget

- The [Education Department General Administrative Regulations in 34 CFR \(EDGAR\)](#) 75, 76, 77, 79, 81, 82, 84, 86, 97, 98, and 99.
- Title [2 of the Code of Federal Regulations Part 200](#), Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.
- Grant Award Notification (GAN).
- [Non-Regulatory Guidance on Allowable Services to HEP and CAMP Students](#).
- Note: Updates to the Uniform Guidance are expected in October 2024. OME will share additional information as it becomes available.

Managing Your Budget

- The Department expects grantees to administer Department grants in accordance with generally accepted business practices, exercising prudent judgment so as to maintain proper stewardship of taxpayer dollars.
- Grantees use proper internal and fiscal controls and fund accounting procedures that insure proper disbursement of and accounting for Federal funds.
- Grantees may use grant funds only for obligations incurred during the funding period.

Grant Drawdowns

Grantees Must:

- Draw down only as much cash as is necessary to meet the immediate needs of the grant project.
- Keep to the minimum the time between drawing down the funds and paying them out for grant activities.

Grantees Are Encouraged To:

- Monitor the fiscal activity (drawdowns and payments) on a continuous basis.
- Plan carefully for cash flow during the budget period and review project cash requirements before each drawdown.
- Confirm that funds are being drawn down in G5/G6 and check the G5/G6 balance for accuracy.

Basis of Your Budget

- Your approved Application Project Narrative.
- Your approved Application ED 524 (Sections A, B & C):
 - **Section A:** Categorical description of use of Federal funds
 - **Section B:** Categorical description of the use of Non-Federal funds
 - **Section C:** Narrative of the use of Federal AND Non-Federal funds
- Subsequent Changes and Revised Budgets.

ED 524 Form

U.S. DEPARTMENT OF EDUCATION BUDGET INFORMATION NON-CONSTRUCTION PROGRAMS		OMB Control Number: 1894-0008 Expiration Date: 08/31/2020				
Name of Institution/Organization		Applicants requesting funding for only one year should complete the column under "Project Year 1." Applicants requesting funding for multi-year grants should complete all applicable columns. Please read all instructions before completing form.				
SECTION A - BUDGET SUMMARY U.S. DEPARTMENT OF EDUCATION FUNDS						
Budget Categories	Project Year 1 (a)	Project Year 2 (b)	Project Year 3 (c)	Project Year 4 (d)	Project Year 5 (e)	Total (f)
1. Personnel						
2. Fringe Benefits						
3. Travel						
4. Equipment						
5. Supplies						
6. Contractual						
7. Construction						
8. Other						
9. Total Direct Costs (lines 1-8)						
10. Indirect Costs *Enter Rate Applied _____						
11. Training Stipends						
12. Total Costs (lines 9-11)						

***Indirect Cost Information (To Be Completed by Your Business Office):**

If you are requesting reimbursement for indirect costs on line 10, please answer the following questions:

- Do you have an Indirect Cost Rate Agreement approved by the Federal government? Yes No.
- If yes, please provide the following information:
 Period Covered by the Indirect Cost Rate Agreement: From: ___/___/___ To: ___/___/___ (mm/dd/yyyy)
 Approving Federal agency: ___ED ___Other (please specify): _____ The Indirect Cost Rate is _____%
- If this is your first Federal grant, and you do not have an approved indirect cost rate agreement, are not a State, Local government or Indian Tribe, and are not funded under a training rate program or a restricted rate program, do you want to use the de minimis rate of 10% of MTDC? Yes No. If yes, you must comply with the requirements of 2 CFR § 200.414(f).
- If you do not have an approved indirect cost rate agreement, do you want to use the temporary rate of 10% of budgeted salaries and wages? Yes No. If yes, you must submit a proposed indirect cost rate agreement within 90 days after the date your grant is awarded, as required by 34 CFR § 75.560.
- For Restricted Rate Programs (check one) -- Are you using a restricted indirect cost rate that: Is included in your approved Indirect Cost Rate Agreement? Or Complies with 34 CFR 76.564(c)(2)? The Restricted Indirect Cost Rate is _____%
- For Training Rate Programs (check one) -- Are you using a rate that: Is based on the training rate of 8 percent of MTDC (See EDGAR § 75.562(c)(4))? Or Is included in your approved Indirect Cost Rate Agreement, because it is lower than the training rate of 8 percent of MTDC (See EDGAR § 75.562(c)(4))?

Defining Reasonable, Allocable, and Allowable

1

Reasonable – 2 CFR 200.404

...when the cost does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost

2

Allocable – 2 CFR 200.405

... when the goods/services involved are chargeable/assignable to a cost objective in accordance with relative benefits received and traceable to specific grant activities

3

Allowable – 2 CFR 200.403

... when costs are necessary and reasonable for the grant performance, consistent with the entity's uniform procedures, in accordance with GAAP, not included in other federally-financed grants (unless authorized)

Pair and Share - 3

1. Would it be reasonable to purchase 40 laptop computers during the ninth month of Year 5 of a 5-year grant performance period?
2. Is paying for a portion of a salary for an administrative assistant not directly related to your HEP or CAMP grant considered allocable?
3. Are posters and other signs for a recruitment event considered allowable expenses?

Answer to Pair and Share - 3

- 1. Would it be reasonable to purchase 40 laptop computers during the ninth month of Year 5 of a 5-year grant performance period?** No, but there are rare instances in which this purchase could be reasonable (e.g., theft of laptops and natural disasters).
- 2. Is paying for a portion of a salary for an administrative assistant not directly related to your HEP or CAMP grant considered allocable?** No, this expense is not allocable, since the administrative assistant is supporting the institution with activities that are unrelated to the grant.
- 3. Are posters and other signs for a recruitment event considered allowable expenses?** Yes, these purchases should be allowable as long as the resources are only used for recruitment.

Indirect Cost Rate Agreement

- Check to see if your project has a **current** indirect cost rate agreement.
- Check the expiration date of the indirect cost rate agreement.
- Please be sure to apply for an indirect cost rate if there is no indirect cost rate agreement in place.

Indirect Cost Rate Agreement (Continued)

- The following text regarding indirect cost can be found in the current Notice Inviting Application (NIA):
- “b. Indirect Cost Rate Information: This program uses a training indirect cost rate. This limits indirect cost reimbursement to an entity’s actual indirect costs, as determined in its negotiated indirect cost rate agreement, or **eight percent** of a modified total direct cost base, whichever amount is less. For more information regarding training indirect cost rates, see 34 CFR 75.562. For more information regarding indirect costs, or to obtain a negotiated indirect cost rate, please see www2.ed.gov/about/offices/list/ocfo/intro.html.”

Carryover Balance

- Unexpended funds from a previous budget period that are authorized for allowable costs in a current budget period
- Can be used in the next budget period for allowable activities without any action by ED or the grantee unless restricted by program staff as an award condition
- Program staff may require a description of how the unexpended funds will be used.
- OME sends out 'large available balance letters' in spring of each year to projects with 70% or more of obligated funds remaining.
- 2 C.F.R. § 200.308

Stipends

- 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.
- Only allowable to the extent that they are *necessary to ensure a student's participation in the project*.
- Only current students are eligible to receive stipends.
- For CAMP, stipends are not allowable as part of follow-up services.

Stipend Examples (Not an exhaustive list)

- Individual student transportation
- Childcare
- Books and supplies, including laptops, if the student is keeping the items
- Testing and exam fees
- Dental and vision assistance
- Room/board and housing assistance for CAMP students
- Housing assistance for HEP students is limited to students enrolled in residential programs

Student incentives are not an allowable use of stipends.

How to Request a Training Stipend Reduction

- When requesting a transfer of funds out of the stipend category for the budget, consider the following:
 - ✓ List the funds in the stipend category.
 - ✓ List the amount needed to move from stipends to another line item.
 - ✓ Provide a reason for moving the funds to another line item.
 - ✓ Explain why the funds will not be needed in the stipend category.
 - ✓ Explain how it is part of the project's objectives.

Changes Requiring Prior Approval (Not an exhaustive list)

- Change in scope or objectives
- Change in key personnel specified in the application
- Absence for more than 3 months of project director (PD) or Principal Investigator (PI)
- A 25% reduction in time of PD or PI
- Costs that require prior approval in accordance with the Uniform Guidance
- Transfer of funds allotted for training allowances (stipends) to other categories of expense
- If NOT described in the application and funded in the approved award, the transfer or contracting out of any work under an award

Note: Changes in scope or requests for additional funding are generally not approved.

OME Monitoring of Fiscal Matters

- Review of application budget
- Review of revised budgets, if requested
- Review of APR expenditure report
- Monthly or quarterly review of drawdowns
- Review of grant balance at continuation
- Review of use of funds for specific requests
- On-site and desk monitoring
- Large available balance and carryover review

Budget Revisions

- Due to your assigned program officer by Monday, September 30, 2024
- May be proposed throughout the year
- Only required if you are requesting changes that require prior approval (see list on prior slide)
- Should be completed using the ED 524 form

Questions

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2024 NDO and ADM Question
Submission Form



A stack of several colorful folders (blue, green, orange, brown) is shown in a perspective view, receding into the background. The folders are slightly out of focus, creating a sense of depth. The text is overlaid on the left side of the stack.

GRANT ADMINISTRATION - CLOSEOUT

No-Cost Extensions



Grantees in their final budget period may initiate a one-time extension without the obligation of additional funds by the Federal government to be used within the scope and objectives of the grant.



The no-cost extension may be for a period of up to 12 months. However, the 12 months is not automatic, and the actual extension period proposed should match the actual work to be completed and the amount of funds remaining unspent under the grant.



One-time no-cost extensions merely for the purpose of using unobligated balances, when all grant project activities have been completed, are prohibited in accordance with 2 C.F.R. § 200.308(d)(2).

Reasons for No-Cost Extensions

- To complete the final grant performance report, which is due within 120 days after the expiration date of the grant.
- To complete the final project evaluation.
- To complete 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 as in the approved application.

Reporting Requirements

- Final Performance Reports (FPRs) are due 120 days after the end of the final performance period.
- Please review G5/G6 when submitting your FPR to ensure the figure in the final report and the final balance in G5/G6 match.



Record Keeping

- The project must keep records regarding the use of grant funds for a period of **three years** after the submission of the final performance report.
- Please note that records may need to be retained for longer than three years in the event of an audit.
- Source: 2 C.F.R. § 200.334 – Record Retention





ACTIVITY: SCAVENGER HUNT

Scavenger Hunt

Raise your hand if you found the answers to these questions in any of the resources mentioned:

1. Is there an OME form for documenting eligibility?
2. What is the definition of a HEP or CAMP “persister”?
3. What is HEP Program Performance Measure 1?
4. What is the purpose of a training stipend?
5. What is an example of a training stipend?
6. For how many years must records be retained following the submission of the final performance report?

Scavenger Hunt Answers

- 1. Is there an OME form for documenting eligibility?** While there is not an OME-specific form, projects are encouraged to develop their own forms and procedures for maintaining this information.
- 2. What is the definition of a HEP or CAMP “persister”?** HEP or CAMP students who completed intake and were enrolled in the performance period being reported but did not attain an HSE (HEP) or complete their first academic year (CAMP) but reenrolled in HEP or CAMP for the next budget period **before** the APR due date.
- 3. What is HEP Program Performance Measure 1?** The percentage of HEP program participants receiving an HSE Diploma

Scavenger Hunt Answers (continued)

- 4. What is the purpose of a training stipend?** The purpose of a training stipend is to offset living or educational expenses that are not included in other financial support.
- 5. What is an example of a training stipend?** One example is a gas card for a commute to and from campus. Additional examples can be found in the fiscal management segment of this presentation.
- 6. For how many years must records be retained following the submission of the final performance report?** Grant records must be retained for a period of three years after the submission of the final performance report. Please note that records may need to be retained for longer than three years in the event of an audit.

Questions

Please feel free to raise your hand in person or virtually.

You may also enter your question(s) into this form. Office of Migrant Education staff will review and respond throughout the NDO and ADM.

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2024 NDO and ADM Question
Submission Form





D

REFERENCE SLIDES



E



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

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 – 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

Packing and Sorting – Eligibility

- **Likely Eligible:** Sorting and packing that takes place **on a farm or in a facility off the farm** that is **primarily engaged in sorting and packing** would likely be classified as agricultural activities
 - These activities are an integral part of harvesting the crop.
- **Unlikely Eligible:** Sorting and packing that **takes place at a processing facility** would likely be classified as the beginning of processing, rather than the end of agricultural production

Source: Eligibility Guidance Question D19

Packing and Sorting – Questions to ask:

- Does the packing and sorting take place on a farm or ranch?
 - If yes, likely eligible
- Does it take place off a farm but part of a larger establishment that performs agricultural production (e.g., a farm where harvesting, sorting, and packing all occur)?
 - If yes, likely eligible
- Does it take place at an establishment that is primarily engaged in packing or sorting **that would otherwise take place on a farm?**
 - If yes, likely eligible

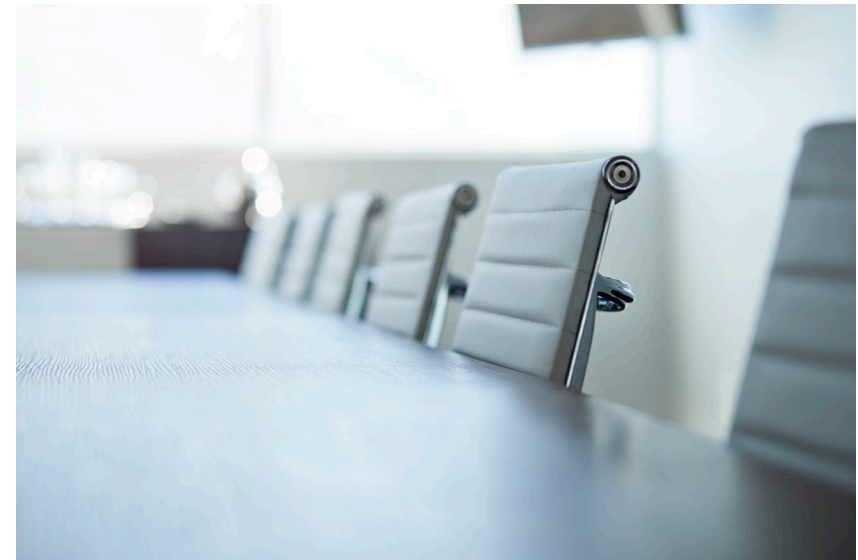
Note: Packing or sorting **areas of a food processing facility** *would not* be considered similar establishments.

Source: Eligibility Guidance Question D19

Closeouts: Transferring Supplies

- What happens to the supplies if the project receives a new HEP or CAMP award?
- OME strongly recommends that the project 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 C.F.R. § 200.314 – Supplies



Closeouts: Transferring Supplies (continued)

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 project must transfer the supplies to another Federally-funded project within the state (e.g., an Institution of Higher Education (IHE) HEP/ CAMP project or a MEP project in the state).

Source: 2 C.F.R. § 200.314 – Supplies

Closeouts: Transferring Supplies (continued)

What happens to the supplies if the project does not receive a new HEP or CAMP award and the supplies are not needed for any other Federal project?

- 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:
 - The project 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 project must retain the supplies for use on other activities or sell them but must, in either case, compensate the Federal Government for its share.

Source: 2 C.F.R. § 200.314 – Supplies