

**Chapter VII: Parental Involvement**  
**[Non-Regulatory Guidance — October 2003]**

## **VII. PARENTAL INVOLVEMENT**

Parental involvement is an integral part of all Title I programs, including the MEP. Research shows that parents play a significant role in the academic achievement of their children. Therefore, it is important for parents and schools to develop partnerships and build ongoing dialogues to improve student achievement. Title I supports parental involvement by enlisting individual parents to help their children do well in school. In order to receive MEP funds, SEAs and the local operating agencies must implement programs, activities, and procedures that effectively involve migrant parents. An SEA must: 1) develop its comprehensive State plan in consultation with parents; 2) consult with parent advisory councils (PACs) regarding programs that are one school year in duration; and 3) plan and operate the MEP in a manner that provides for the same parental involvement as is required in section 1118.

This chapter discusses the parental involvement requirements in more detail.

### **STATUTORY REQUIREMENTS:**

Section 1118 of Title I, Part A and sections 1304(c)(3) and 1306(a)(1)(B)(ii) of Title 1, Part C

### **REGULATORY REQUIREMENTS:**

34 CFR 200.83(b)

#### **A. Parent Consultation in MEP Planning and Operation**

##### **A1. Are SEAs and local operating agencies required to consult with parents in planning the MEP?**

Yes. Pursuant to section 1304(c)(3), SEAs and local operating agencies must consult with parent advisory councils in planning and operating the MEP if they operate programs of one school year in duration. The statute also requires the MEP provide for the same parental involvement as is required in section 1118, unless extraordinary circumstances make such provision impractical. This provision requires SEAs and local operating agencies to involve parents, in an organized, ongoing, and timely way, in the planning, review, and improvement of the MEP. (See section 1118(c)(3) of the statute.) In addition, section 200.83(b) of the regulations requires SEAs to develop the comprehensive State plan in consultation with the State parent advisory council if the program is one school year in duration. If the program is less than one school year in duration, the SEA must consult with migrant parents.

##### **A2. Why is parental consultation in planning the MEP important at the State and local level?**

As the first teachers of their children, parents know the needs of their children best and can provide insight into their children's strengths and weaknesses. As such, migrant parents can play a pivotal role in planning the educational programs and projects in which their children participate. Involving migrant parents in planning the MEP also builds their capacity to assist in their children's learning at home. In addition, parental involvement in the planning of the

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program enables parents to understand the program and have informed conversations with MEP and school staff regarding their children's education. Through their participation in the planning process, migrant parents are also more likely to become advocates and supporters of the program because they have a personal stake in its success.

**B. Parent Advisory Councils**

**B1. When is an SEA and local operating agency required to establish a parent advisory council (PAC)?**

Section 1304(c)(3) of the statute requires SEAs and local operating agencies to establish and consult with PACs in planning and operating MEP programs and projects of one school year in duration.

**B2. What is the function of a PAC?**

A PAC advises the SEA and its local operating agency on concerns of migrant parents that relate to the planning, operation, and evaluation of MEP programs and projects in which their children participate. In particular, the SEA and local operating agency must consult with the PAC about: (1) the comprehensive assessment of the needs of migratory children to be served; and (2) the design of the comprehensive service delivery plan.

**B3. Section 1304(c)(3) of Title I requires that PACs must be established only for "programs extending for one school year of duration." What does this mean?**

The Department interprets this phrase to mean a program or project that provides instructional or support services to migrant children and their families *throughout* the regular school year (i.e., generally, September through June or as otherwise defined by the State). This requirement applies to both SEAs and local operating agencies.

**B4. Must a project that operates only in the summer and fall establish a PAC?**

No. While such a project operates *during* the regular school year, it does not operate *throughout* the regular school year. Therefore, the project is not required to have a PAC.

**B5. Who is eligible to be a member of a PAC?**

Parents or guardians of eligible migrant children and individuals who represent the interests of such parents are eligible to serve as PAC members.

**B6. How may an SEA and local operating agency select PAC members?**

SEAs and local operating agencies should try to select PAC members that are a representative sample of migrant parents. Although there are a number of ways to select PAC members, to the extent feasible, parents of eligible migrant children should elect members of the PAC. The SEA might arrange for local PACs to elect members to the State PAC. In some instances, elections may not be possible because migrant families are very mobile. If elections are not possible, the SEA or local operating agency may select members by appointing volunteers or those nominated

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by other parents, teachers, or administrators. In any event, the method the SEA or local operating agency selects should provide for maximum parental participation.

**B7. Are there any “formal” procedures or scheduling requirements that govern PAC meetings?**

No. However, the SEA and local operating agency should establish appropriate procedures and schedules that support effective consultation with the PAC in the planning, operation, and evaluation of each MEP program or local project.

**B8. How may SEAs and local operating agencies facilitate effective participation of PAC members at meetings?**

Agencies should provide parents the meeting location, time, and agenda well in advance. Meeting times should be convenient for parents and accommodate their work schedules. The SEA or local operating agency may provide transportation, childcare, or other reasonable and necessary costs to facilitate attendance. Meeting agendas, minutes, and other materials should be in a language and format that parents understand. Meeting rules should support open discussion.

**B9. Must the MEP comprehensive State plan include names of parents specifically involved in the planning, design, and implementation of the project?**

No. Although section 200.83(b) of the regulations requires SEAs to develop the comprehensive State plan in consultation with the State PAC (or migrant parents, if the program is less than one school year in duration), SEAs do not have to include the names of parents who were involved in this process.

**B10. What are the SEA and local operating agency's responsibilities if they are unable, after diligent efforts, to maintain a functioning PAC due to lack of participation?**

Agencies should pursue all reasonable avenues of obtaining and reviving PAC participation before deciding that maintaining a functioning PAC is not possible. The State and local operating agency should maintain records of their ongoing efforts to maintain or establish a PAC.

**B11. May MEP funds be used to pay the reasonable and necessary expenses that PAC members incur to attend PAC meetings?**

Yes.

**B12. May MEP funds be used to compensate PAC parent members for *lost wages* incurred to attend PAC meetings?**

Yes. If necessary, MEP funds may be used to reimburse PAC *parents or guardians of eligible migrant children* (but not other members of the PAC) for lost wages incurred in attending a PAC meeting.

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**B13. May MEP funds be used to pay *expenses* of PAC members who are not the parents or guardians of eligible migrant children?**

Yes. All participating members of the PAC, including teachers and other State operating agency personnel who have been chosen by the parents of migrant children, may receive reimbursement for their expenses.

**B14. Does having a PAC meet all the requirements of Section 1118?**

No. However, *an active* PAC may be an appropriate focal point of an agency's parental involvement efforts. For example, these PACs may be used to:

- Ensure full parental participation in MEP project planning, design, and implementation;
- Convene an annual meeting of parents, at which school officials explain the MEP projects; and
- Provide opportunities for regular parent meetings to gather input.

To the extent that the SEA or local operating agency relies on a PAC to assist in meeting some of its responsibilities for parental involvement, it must also ensure the participation of individual parents through the policy involvement, shared responsibility, and capacity-building activities under section 1118.

**B15. Are there any parental involvement requirements under section 1118 that cannot be implemented through a PAC?**

Yes. For example, section 1118 requires school officials to provide parents with reports on their children's progress and to make teachers and other staff available to them for regular meetings. SEAs and local operating agencies cannot accomplish this through PAC meetings or other group sessions. These activities require contact with individual parents.

**C. Parental Involvement Activities under Section 1118**

**C1. What does the statute require regarding parental involvement?**

Section 1304(c)(3)(a) requires an SEA and local operating agency to conduct parental involvement activities “in a manner that provides for the same parental involvement as is required for programs and projects under section 1118, unless extraordinary circumstances make such provision impractical.” The statute also requires parental involvement activities to be conducted in a format and language understandable to parents.

**C2. Is this requirement different than before?**

Yes. The parental involvement requirement in 1304(c)(3)(a) is stricter than in past years. Before, an SEA and local operating agency only had to carry out the MEP “in a manner consistent with” section 1118 “to the extent feasible.” The current language of the statute creates

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a higher standard for complying with parental involvement requirements. Now, absent extraordinary circumstances, an SEA and local operating agency must follow the requirements of section 1118 to be in compliance with section 1304(c)(3)(a).

**C3. What does section 1118 require?**

In general, section 1118 requires:

- A written parental involvement policy;
- Policy involvement of parents in an organized, ongoing, and timely way in the implementation of the MEP;
- Development of a school-parent compact in order to share the responsibility for high student academic achievement;
- Capacity building of parents and school staff for strong parental involvement; and
- Effective access to parental involvement activities.

**C4. May MEP funds be used to support parental involvement activities required by section 1118?**

Yes. MEP funds may be used to pay the cost of parental involvement activities, such as: parent conferences; resource centers; training programs (including expenditures associated with attending such programs); reporting to parents on children's progress; hiring, training, and use of parental involvement liaison workers; training personnel, including pupil services personnel; providing school-to-home complementary curricula and materials in implementing home-based educational activities; providing timely information on the MEP and responses to parent recommendations; and soliciting parents' suggestions in the planning, development, and operation of MEP projects.

**C5. May MEP funds be used to support parents' attendance at workshops and conferences?**

Yes. An SEA and local operating agency may use MEP funds for costs that are reasonable and necessary to support the attendance of migrant parents at workshops and conferences that enable them to participate more effectively in the local program or to conduct home-based educational activities. The SEA and local operating agency should develop criteria, in consultation with parents, to determine the reasonable number of parents who may attend national meetings. Upon return, attendees should provide information and, if possible, training on the conference topics to other migrant parents.

**C6. May parents be paid a wage or stipend to attend parental involvement activities or meetings?**

No. The statute does not authorize a local operating agency to pay wages to a parent to attend a meeting or training session, or to reimburse a parent for salary lost due to attendance at general

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parental involvement activities. Parental involvement expenditures are limited to actual expenses that a parent may incur. (Note: The rules differ for members of parent advisory councils. See Question B12 of this chapter.)

**C7. May MEP funds be spent for food and refreshments provided during parent meetings or training?**

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

**C8. May parents serve as classroom aides and tutors?**

Yes. However, parents with instructional duties who are paid to work in a schoolwide school or who are paid with Title I, Part A funds to work in Title I targeted assistance program must meet the paraprofessional education qualification requirements of section 1119. These requirements do not apply to parents who volunteer for such duties. (See Title I, Part A guidance on paraprofessionals available on the Department's website at <http://www.ed.gov/policy/elsec/guid/paraguidance.pdf>.)