

ConQIR

Rolling Re-interview



CPIT Implementation Tool ConQIR Project TAT Activities & Outcomes

- 1.4 Conduct a literature review of research on ID&R interviewing, re-interviewing, and eligibility determination.
- 1.11 Develop sample interview and re-interview protocols
- 1.12 Develop sample designs for conducting re-interviews and writing reports
- 1.13 Develop step-by-step re-interview sampling methods
- 1.14 Identify processes for ensuring high inter-rater reliability

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Executive Summary

The Rolling Re-interview has been developed to help states determine whether children enrolled in the Migrant Education Program (MEP) during a current program year were properly identified and eligible to receive services paid for with MEP funds. This document describes procedures and guidance that can be used to sample on an on-going basis a state's recruited children, re-examine information obtained during an initial interview, and take appropriate steps based on the results. The Rolling Re-interview plan has a sample universe including only those children recruited during the six weeks.

Purpose

A core responsibility of each State Educational Agency (SEA) under the Title I, Part C, and Migrant Education Program (MEP) is to ensure that only those children who are eligible for the MEP are recruited, counted, and served. Meeting this responsibility is key to ensuring that 1) states' direct MEP-funded services only to eligible migrant children, 2) the MEP allocation each state receives reflects its statutory share of the MEP funds that Congress annually appropriates for services to migrant children, and 3) public confidence in the program and its integrity remains strong (Garcia, 2004).

The Office of Migrant Education (OME) has become increasingly concerned that not all states are implementing quality control procedures that are sufficient to ensure that the migrant child counts they annually report to OME are correct. Results in several states that have performed a re-interviewing process indicate that ineligible children have been recruited, counted, and served.

The objectives of the Rolling Re-interview are to:

1. Examine through re-interviewing of parents/guardians/self-eligible youths the validity of an initial interview prior to the sampled youth's inclusion in a state child count;
2. Ensure that only eligible students receive MEP services;
3. Identify areas/topics for future recruiter training;
4. Improve overall quality and accuracy of state eligibility determination.

Children are eligible to receive MEP services if they meet the definition of “migratory child” **AND** if the basis for their eligibility is properly recorded on a Certificate of Eligibility (COE). Determining whether a child meets the definition of a “migratory child” is often difficult and depends upon a migrant recruiter’s assessment of information presented by a parent or other family member, guardian, or other individual responsible for the child. A child is eligible for the MEP if:

1. the child is younger than 22 (and has not graduated from high school or does not hold a high school equivalency certificate); **AND**
2. the child is a migrant agricultural worker **OR** has a parent, spouse, or guardian who is a migrant agricultural worker or a migrant fisher; **AND**
3. the child has moved within the preceding 36 months in order to obtain (or seek) or to accompany (or join) a parent, spouse, or guardian to obtain, temporary or seasonal employment in qualifying agricultural or fishing work; **AND**
4. such employment is a principal means of livelihood; **AND**
5. the child has moved from one school district to another.

(Office of Migrant Education, 2003)

Target Population

The target population of the rolling re-interview is migrant families identified within six weeks of initial interview and prior to being enrolled into the program.

Methodology

The Rolling Re-interview Plan is comprised of five sections:

Part 1: Sampling - explains different strategies for developing a sampling plan of sufficient size and correct sampling methods to meet suggestions from the Office of Migrant Education.

Part 2: Training - addresses the selection of a re-interviewing team and training that an effective re-interviewer would need.

Part 3: Conducting Interviews - addresses how to develop correct methods of obtaining data from families and methods of documenting that data.

Part 4: Determining Eligibility - addresses how data obtained from the re-interviewer can be used to determine eligibility of families enrolled in the program. It also addresses the review panel and an appeals process that can be used if a district or a recruiter would like to dispute findings by the re-interviewer.

Part 5: Calculating defect rate - explains how a state can calculate an accurate defect rate based on data collected during the re-interview process.

Part 1: Sampling

When conducting the rolling re-interview, a state first needs to develop a written sampling plan. This plan should clearly describe the goals of the re-interview, the desired precision of the sample, and address how the state will ensure that the sample sufficiently reflects the state's migrant population for the current program year. This plan should also clearly describe the sampling procedure to be followed.

Based on the state's sampling plan, a list of students will be generated. The sampling list will depend on the state's goals for its Rolling Re-interview. Considering that only eligibility determinations made in the six-week period are to be included in the population, the state has the opportunity to utilize a sampling method that can best help it ensure that only eligible children have been recruited. For example, some states may determine that the eligibility determinations of all recruited children require equal scrutiny. In such cases, states would develop a sampling plan that does not differentiate among children depending on age, location, type of work, or other distinguishing factors. Other states may determine that sampling lists should be generated for respective geographic areas. Some states may believe that certain types of qualifying activities, such as "temporary" positions, may require intensive review and generate a sample that is more heavily weighted with these children. Regardless of the presence or absence of a stratification plan, states should attempt to re-interview a minimum of 3% of its population recruited within each six-week period.

It is important that as a state develops and approves a sampling plan for the re-interview process, the plan is followed as completely as possible. Any exceptions or changes should be documented.

The sampling method could potentially yield under-representation of the more mobile members of the target population. To maximize the number of families who can be contacted, efforts should be made to conduct the interview at a time when the target population is residing in the LEA. High mobility is an inherent characteristic of migratory workers. States should over sample in order to ensure that mobility does not prevent achieving the number of re-interviews required by the state's Rolling Re-interview plan.

Part 2: Training

There are several key factors to keep in mind when selecting re-interviewers. All re-interviewers need to be independent from the original recruiters who recruited families in the state. They also need to be fluent in the language of the families they are to re-interview. The state should seek out individuals who have knowledge and experience working with the migrant population (e.g. local recruitment coordinator, ID&R coordinator).

States should provide training that corresponds to the responsibilities of the re-interviewer as conceived by its adapted Rolling Re-interview plan. **Appendix A** contains a sample agenda for recruiter/re-interviewer training. **Appendix E** contains a glossary of terms for staff in case questions arise regarding program specific vocabulary.

Questions to consider in developing training include:

- How familiar is the re-interviewer with the MEP and eligibility requirements?
- Is the re-interviewer a trained recruiter?
- How familiar is the re-interviewer with the work and migration issues of his/her particular re-interview area?
- Will the re-interviewer make an eligibility determination based on the re-interview, or will he/she be gathering eligibility information for a separate reviewer to make an eligibility decision?
- Will the re-interviewer come to the interview with information regarding the child's initial eligibility determination (information contained on a COE, for example)?

Before re-interviews are conducted with migrant families, all re-interviewers should be tested and observed during mock interviews to ensure they are following the established procedures of the re-interview. Additionally, re-interviewers may be accompanied during an interview to ensure they are following correct protocols. Data sheets should be reviewed at the start of the re-interview process to ensure they are being correctly completed.

The attached documents include a protocol with questionnaires that can be used during the re-interview of migrant families. (**Appendix B**)

Part 3: Conducting Interviews

Re-interviews should be given specific instructions to follow a set of questions and to record the answers to those questions on approved forms. (**Appendix B**) The state will need to determine if the re-interviewer would then make an eligibility determination based on the information gathered at the time of the interview or if a separate reviewer would be reviewing the data collected in order to determine eligibility of a child.

When reviewing data from re-interviewers, the reviewer would need to ensure that the re-interviewer is providing data to demonstrate that he/she is clearly following directions outlined on how to conduct re-interviews and can correctly document data collected.

It is important to know that re-interviews can be conducted face-to-face with families or over the phone. It will be up to the individual state to determine how these will be conducted. **Appendix C** outlines some helpful hints of how to conduct a successful re-interview over the phone.

Part 4: Determining Eligibility

States should provide the panel or re-interviewer determining eligibility clear protocols to follow in determining if a child is, indeed, eligible for the program. These protocols can be developed on a checklist or form (**Appendix B/ G**) that would allow the panel or re-interviewer to clearly document if a child is eligible. When determining if a child is eligible, data gathered by the re-interviewer and the original interview should be reviewed. Any differences should be noted. If an eligibility determination changes from the original determination, this panel or re-interviewer would need to document the specific differences.

Once re-interviews have been conducted and eligibility determinations related to the re-interviews have been made, a formal appeals process should be initiated. Districts and recruiters should be given a copy of the findings. If districts or recruiters do not agree with the conclusions of the re-interviewer or panel, they should be allowed to submit information related to specific cases that they deem to not be correct. (See **Appendix D** for a sample form) An independent review panel should be created to conduct a review of any information submitted in the appeals process. This panel should keep documentation of all decisions made related to the appeals process.

All efforts should be made to ensure that accurate documentation is kept during all steps of the re-interview process.

Part 5: Calculating the Defect Rate

States can use the following formula for calculating defect rates if they used a random sample for the whole group that was not stratified.

Take the number of migrant students interviewed and divide it into the number of students that were found to be ineligible. For example, if 350 students were interviewed and 25 students were found to be ineligible ($25/350 = .071 \times 100 =$ Defect rate of 7.1%) the state would have a defect rate of 7.1%.

If the sample were stratified, correct weights would need to be applied. This would be necessary to create a non-biased estimate of the defect rate for the non-proportional sampling/response. States would need to determine the percentage of the population for each non-proportional sub-group in order to calculate the defect rate. For example:

Forty percent of the migrant students in the state are highly mobile and they leave every year in June. Sixty percent of the migrant students in the state are present for 10 months of the year.

The state sampled 100 students of the mobile population and 100 students of the population present for 10 months of the year. Of the mobile population, which makes up 40% of the population, the re-interview process found 10 ineligible students. Of the second population, which makes up 60% of the population, the re-interview process found 23 ineligible students.

In order to determine the defect rate, the state would multiply the sub-groups defect rate (number deemed ineligible divided by number of re-interviews conducted) by the group proportion of the population. Then the percentages would be added together of the different sub-groups to reach the total population defect rate.

For example, in the previous scenario the non-mobile population makes up 60% of the proportion of the population. Twenty-three students were found to be ineligible so that would be 23% of the 100 sampled. Twenty-three percent would then be multiplied by 60%,

which would equal a 13.80% defect rate. The mobile population made up 40% of the total population and 10 students were found to be ineligible or 10% of the mobile population. Ten percent would then be multiplied by 40% for a group defect rate of 4%. This 4% would then be added to the 13.80% from the previous sub-group for a total population defect rate of 17.80%.

Group	# in-group	# sampled	# interviewed	# in-eligible	group defect rate	group proportion	defect rate
Non-mobile	600	100	100	23	23%	60%	13.80 %
Mobile	400	100	100	10	10%	40%	4%
Total population defect rate 17.80%							

Part 6: Quality Control

The results of the Rolling Re-interview should inform the corrective actions a state will take in order to recruit only eligible children. These corrective actions could include the following changes to the ID&R Process:

1. Revising the ID&R Manual
2. Redesigning required training for recruiters
3. Developing a professional development schedule for local project directors and recruiters to ensure knowledge and understanding of the MEP Non-regulatory Guidance
4. Implementing a specific, ongoing technical assistance in the area of ID&R for projects with excessive error rates.
5. Increasing accountability between local projects and the state ID&R staff.

Appendix F contains information for COE reviewers regarding red flags that might signal a possible eligibility concern with a COE.

Part 7: Conclusion

The utilization of the Rolling Re-interview will enable the Migrant Education Program in each state to thoroughly examine its efforts to provide quality ID&R efforts and to improve upon the delivery of services to eligible migrant children, youth, and their families.

Bibliography

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APPENDIX A
Sample Agenda
Training of Local Recruiters and or Re-interviewers

- I. Welcome to the Training
 - a. Introductions
 - b. Purpose and Goal of the Training

- II. Self Assessment
 - a. Survey of Recruiter Knowledge
 - b. Survey of Recruiter Skills
 - c. ConQIR Recruiter Pre-test
 - d. Quiz on Regulatory Guidance
 - e. ConQIR Scenarios
 - f. Discussion of areas that target weaknesses
 - g. Re-teach areas of weakness
 - h. Individual discussions on weak areas and plan of improvement

- III. ConQIR Products
 - a. Introduction of ConQIR Products
 - b. Recruiter Tips
 - c. Basic Interview Package
 - i. Review all five questionnaires and explain the purpose of each
 - ii. Explain importance of content, sequence, and consistency
 - d. Rolling Re-Interview Package
 - i. Explain the purpose of the rolling re-interview
 - ii. Explain the relationship between the initial interview and the follow-up re-interview
 - iii. Explain the importance of inter-rater reliability
 - e. Tri-Annual Re-Interview
 - i. Explain the relationship of the tri-annual re-interview to the initial interview.
 - ii. Explain the importance of inter-rater reliability

- IV. Practice, Application, and Role-Play of ConQIR Products
 - a. Practice with each of the questionnaires
 - b. Practice using scenarios with questionnaires
 - c. Role-play use of questionnaire under different conditions

- V. State Protocol and Resources
 - a. State related materials (State COE, any supplemental forms required, state policies on how to fill out a COE, policies related to temporary work, and any additional documentation required by a state to complete a COE)
 - b. Copy of Non-Regulatory Guidance

- VI. Evaluation
 - a. Product Quality Rubric
 - b. Discussion of the strengths and weaknesses of the new products
 - c. Revision of Products Based on feedback

APPENDIX B

ConQIR Re-Interview Questionnaires & Sample Protocols

Overview and Purpose:

This document contains two different questionnaires. These questionnaires have been designed to cover basic situations that a re-interviewer will come across when re-interviewing. The purpose of the questionnaires is to provide a re-interviewer with the questions needed in order to obtain sufficient information to make an eligibility determination on a previously identified migrant child, youth and family.

- Questionnaire 1: Interviewing Families at their Place of Residence (phone or home visit)
- Questionnaire 2: Out of School Youth at Place of Residence (phone or home visit)

It is recommended that the questions in the questionnaires be followed in the order they appear on each page. However, re-interviewers have the option to change the order as long as *all questions are asked*. In each of the questionnaires, there are questions that are in **bold** text. These questions can be asked first if a re-interviewer wants to quickly obtain the information needed to determine if the family or youth is eligible. The questions in regular text are the additional questions that help a re-interviewer probe further to obtain needed details on the interviewee's situation.

These questionnaires can be used in face-to-face re-interviews and to re-interview families and youth over the phone.

Additional Hints

The following are specific hints of how to put interviewees at ease when re-interviewers are interviewing families or youth.

- Re-interviewers should clearly state how they are affiliated with the program and their purpose in the second visit or call. For example - "I work with the Migrant Education Program. I know Juan Rodriguez came by your house two weeks ago. He left some materials with you and your family was signed up for the program. I am just here (or calling you) to verify the information we have regarding your family and provide you with some additional information regarding our program." Then the re-interviewer should begin the interview- if appropriate, he/she should ask if the interviewee has a few minutes to answer a few questions.
- If a re-interviewer is making a call to re-interview a family, he/she should try to talk with the person that was interviewed before so they feel comfortable providing answers. If that is not a possibility, it is important for the re-interviewer to be able to explain to the person answering the phone, such as a spouse, how the re-interviewer has their information. For example, "I work with the Migrant Education Program. I know Juan Rodriguez came by your house two weeks ago. He left some materials with your husband (or wife) and your family was signed up for the program. Did you get a chance to see those? -or- Did he/she mention the visit? I

am just here (or calling you) to make sure the information we have is correct and provide you with some additional information regarding our program.”

- If a family asks why the information needs to be verified, the re-interviewer could say the following. “Our program tries to make sure that we are serving those that are in need of the services and that we have a clear process to determine who is eligible for the program and we take extra care to ensure that we are all doing our jobs right.”
- It is always helpful for re-interviewers to have some additional materials available for migrant families. This can be used as a token of thanks for the additional time a family or youth has made for their information to be verified. Migrant programs can use materials available through other community resources such as resource guides, hygiene kits, reading materials, or books from the Migrant program designed to help interviewees learn English etc. This will help them know we appreciate their time and we can use this as a way to provide an additional service or resource to eligible families.

Sample Re-interview Protocol

1. Re-interviewer is tested using basic test.
2. Test is corrected, any incorrect questions are explained, and concepts are re-taught.
3. Re-interviewer is trained on how to use the questionnaires (This is done through role-playing). Emphasis is on ensuring that the re-interviewer follows the basic questions to ensure they are asking the same basic questions asked by the interviewers.
4. Specific protocols related to the state are covered, such as how the re-interviewer will introduce himself/herself, information regarding services in different areas in case family’s request for additional information, and any specific materials available to them should also be covered at this time.
5. Re-interviewer should review the state Certificate of Eligibility and any other supplemental forms that will be made available.
6. Information regarding how the re-interview questionnaire needs to be filled out along with protocols on verifying additional information on the COE needs to be explained.
 - Re-interviewer asks specific questions on questionnaire.
 - Re-interviewer documents answers to questions on questionnaire.
 - Re-interviewer answers any additional questions asked.
 - Re-interviewer documents any additional comments regarding the re-interview on the bottom of the appropriate questions.

Interview Questionnaire # 1 : Families at Place of Residence

Person Interviewed:	Date:
<i>Eligibility Questions</i>	<i>Recruiter Fill In</i>
1. How long has your family lived at this address?	(Less than 36 months?) Yes No
2. Where did you live before you moved here?	
3. What date did you move here? <i>If over eligibility period, ask more questions.</i>	(Within last 36 months?) Yes No Date:
4. When you moved here, did the children move with you? <i>If yes, skip question #5.</i>	Yes No
5. What date did the children move here? (Yellow is to remind them this a follow up question and may not need to be asked.)	(Within last 12 months?) Yes No Date:
6. Why did your family move here?	(Seek or obtain work?) Yes No
7. What type of work were you (or spouse) looking for when you moved here? <i>If this move does not qualify, ask if there have been other moves that may qualify.</i>	

Ask additional questions needed to verify COE.

Re-interviewer Comments:

Re-interview Cuestionario de Entrevista # 1

Persona Entrevistada:	Fecha:
<i>Preguntas de Elegibilidad</i>	<i>Reclutador llenar</i>
1. ¿Por cuánto tiempo ha vivido su familia en esta dirección?	(¿Menos de 36 meses?) Sí No
2. ¿Donde vivían antes de moverse para acá?	
3. ¿Cuál es la fecha en que se movieron para acá? <i>Si no se movió durante el periodo de elegibilidad, haga más preguntas.</i>	(¿En los últimos 36 meses?) Sí No Fecha:
4. ¿Cuando se movió para acá sus niños se movieron con Ud.? <i>Si la respuesta es sí, ignore la pregunta #5.</i>	Sí No
5. ¿Cual fue la fecha en que los niños se movieron para acá? (Yellow is to remind them this a follow up question and may not need to be asked.)	(¿En los últimos 12 meses?) Sí No Fecha:
6. ¿Porque su familia se mudo para acá?	(¿Buscar u obtener el trabajo?) Sí No
7. ¿Cual fue el trabajo que Ud. o su esposo/ a busco cuando se movieron para acá? <i>Si esta movida no califica, pregunte si no se han mudado anteriormente.</i>	

Haga preguntas adicionales si necesita llenar el Certificado de Elegibilidad.

Comentarios del re-interviewer:

Interview Questionnaire # 2: OSY at Place of Residence

Person Interviewed:	Date:
Eligibility Questions	Recruiter Fill In
1. How old are you? (or all of you) What is your birth date?	(Under 22 years old?) Yes No Ages:
2. Have you (or any of you) graduated high school or received a GED? <i>Make sure you clarify whether "finished" school is not simply secundaria or primaria.</i>	Yes No
3. How long have you lived at this address?	(Less than 36 months?) Yes No
4. Where did you live before you moved to this address?	
5. What date did you move here? <i>If over eligibility perio, ask more questions.</i>	(Within last 36 months?) Yes No Date:
6. Why did you move here?	(Seek or obtain work?) Yes No
7. What type of work were you looking for when you moved here? <i>If this move does not qualify, ask if there have been other qualifying moves.</i>	

Ask additional questions needed to verify COE.

Re-interviewer Comments:

Re-interview Cuestionario # 2: OSY en el lugar donde residen

Persona Entrevistada:	Fecha:
Preguntas de Elegibilidad	Reclutador llenar
1. ¿Cuántos años tiene Ud. (o Uds.)? ¿Cual es su fecha de nacimiento?	(¿Menos de 22 años?) Sí No
2. ¿Usted se ha graduado de la Escuela Superior o recibido el Equivalente?	Edades: Sí No
3. ¿Por cuánto tiempo usted ha vivido en esta dirección?	(¿Menos de 36 meses?) Sí No
4. ¿Donde Ud. vivía antes de moverse para acá?	
5. ¿Cuál es la fecha que Ud. se movió para acá?	(¿En los últimos 36 meses?) Sí No
	Fecha:
6. ¿Porque Ud. se movió para acá?	(¿Buscar u obtener el trabajo?) Sí No
7. ¿Qué tipo de trabajo Ud. buscó cuando vino para acá?	

Haga preguntas adicionales si necesita llenar el Certificado de Elegibilidad.

Comentarios del re-interviewer:

APPENDIX C

Phone Etiquette

The appendix has been created to provide some helpful hints of how to conduct a successful phone interview/re-interview.

1. Ask specifically for the parents of the child(ren) you are interested in interviewing or re-interviewing.

Example: *“Can I speak with the parent(s) of (name of the child)”*

2. If the person you are trying to contact is an out-of-school youth, ask specifically for that person.

Example: *“Is (say the name of the person) there?”*

3. When the parent or youth is on the phone, then introduce yourself.

Example: *“Hi my name is _____ and I work with*

4. At this point it is very important to explain how you have their information. Some ways family/youth information is often gathered is through:
 - A recruiter who has already spoken with the family etc.
 - Information they provided when they called the national hotline etc.

Example: *You recently spoke with Juan Chavez about the Migrant Education Program. I work with him.....*

5. Once you have stated who you are, you can then state your purpose of the call. (Then proceed to the interview/re-interview questions)

Example: *I would like to ask you a few questions to verify the information I have on file for you.*

Example: *I would like to ask a few questions to make sure we have your information correct.*

Points to Remember:

Courtesy is as important in speaking over the phone as in talking to people face to face. A conversation over the phone carries just as much weight as a face-to-face meeting.

Time your calls so as not to interfere with the work schedule of those you call. Also when the number you are calling is not answered quickly; wait long enough for someone to put aside what he or she is doing. It is very annoying to have been disturbed just to pick up the telephone and find the caller has hung up.

A person should always be certain of the number he is dialing to avoid disturbing someone unnecessarily. If you do reach a wrong number, it is important to say, ***“I'm sorry, I dialed the wrong number”*** before hanging up.

When you talk on the telephone, remember - The person at the other end of the phone cannot see your facial expressions or gestures and the impression he receives depends on what he/she hears. The telephone carries your voice at its natural volume and pitch. Try not to shout but speak clearly and distinctly

Be prepared with a one or two sentence explanation of the purpose for your call. When you are connected with the person, state the purpose of your call and then be sure to ask if you are calling at a convenient time.

Example: I received your phone number and information from your child's school. They provide me a list of names of newly enrolled students and ask me to call to see if you qualify for an educational program we offer. Is now a good time?

This is one of the most overlooked areas of phone etiquette, and allows the person you're calling the opportunity to better address your needs at a later time. Don't fib about how long your call will take - if you know it will take longer than five minutes, don't say, "It'll be quick."

Let the person know what they are getting into at the start of the conversation. If you are asked why you are calling, give a concise but informative statement that can be easily relayed.

Example: I am calling to see if you and your family might qualify for an educational program offered through the school district. May I ask you a few questions?

Do not, however, assume that your message will be communicated; when you speak directly with the person you are trying to call, repeat your message in your own words. Don't be insulted if you're asked to leave a message or call back later - previous engagements do take priority

If you have to leave a message or voice mail for someone, make it short and to the point. Speak clearly and slowly and leave your name, phone number, and a brief message. Say your name and number at the beginning and again at the end of the message, especially if you don't know the person you're calling.

Example: Hello, my name is _____ and I am calling to see if you and your family might qualify for an educational program being offered through our school district. Please call me at _____ to see if there is a way we can help you. Again, this is _____ at _____. I look forward to hearing from you.

If the voice mail system allows you to play back your message, consider taking advantage of that feature to make sure your message is clear and communicates your needs. Phone calls generally should not be made before 7:00 a.m. in the morning or after 9:30/10:00 p.m. at night. Try to avoid mealtimes.

APPENDIX D
Sample Challenge Form

MEMORANDUM

TO: Directors/Coordinators and Recruiters
FROM: ID&R Coordinator (Name)
DATE: June 28, (Current Date)
RE: Children initially found to be Ineligible in Audit

On (Date) I will be sending to both Directors and recruiters the name(s) of any child (ren) thought to be ineligible that are located in your program and were recruited by your recruiter(s).

The reason for their ineligibility will be listed next to the child's name on a report that I will send you. I am requesting that you immediately review this information and give a response if you know of or find information that can challenge this preliminary ineligibility determination. **THIS IS VERY IMPORTANT TO DO QUICKLY AND AS ACCURATELY AS POSSIBLE.** Reasons given for a challenge that are useful could be: e.g. an ineligibility ruling is made based on the information gathered during the audit that indicates that no movement across school district lines occurred for a family. You can produce a school records request form from another state or district that was made on the child's behalf during the aforementioned time period that would negate the audit finding. Another could be that qualifying farm work was performed and you can verify with an employer or knowledgeable person that they did. In that case, fax or e-mail detailed report with information that supports your decision.

IT IS IMPERATIVE THAT YOU SUBMIT THIS INFORMATION TO OUR OFFICE WITHIN FIVE DAYS OF NOTICE (please fax or e-mail results only).

The report will look something like this:

NAME OF CHILD:

COE# (copy enclosed)

SCHOOL DISTRICT AT TIME OF AUDIT:

PRELIMINARY REASON FOR INELIGIBILITY DETERMINATION:

CHALLENGE RESPONSE:

APPENDIX E

Definition of Terms

1. **Identification** - Determining the location and presence of migrant children.
2. **Recruitment** - Making contact with migrant families, explaining the MEP, securing the necessary information to make a determination that the child is eligible for the MEP, and recording the basis of the child's eligibility on a COE.
3. **QAD** – (Qualifying Arrival Date) The date a migrant made a qualifying move, also known as LQM (last qualifying move).
4. **PMOL** – (Principal Means of Livelihood) An agricultural or fishing activity that plays an important part in providing a living for the worker and his/her family.
5. **COE** – (Certificate of Eligibility) A legal document used to record eligibility determinations.
6. **Validation** – The process of authenticating a COE for eligibility determination. After validation, the COE information will be included in the state's child count.
7. **Re-Interview** – The process of conducting a complete face-to-face second interview for validation purposes.
8. **Verification** – The process of confirming or supporting what is documented on the COE.
9. **Quality Control** – The process of ensuring the accuracy of eligibility determinations
10. **Qualifying Work** –
 - a. **Agricultural Work** – 1) any activity directly related to the production or processing of crops, dairy products, poultry, or livestock for initial commercial sale or as a principal means of personal subsistence; 2) any activity directly related to the cultivation or harvesting of trees; or 3) any activity directly related to fish farms.
 - b. **Fishing Work** – The catching or initial processing of fish or shellfish or the raising or harvesting of fish or shellfish at fish farms. It consists of work performed generally for wages or, in rare cases, personal subsistence.
11. **Qualifying Move** – A change from one residence to another across school district lines in order to seek or obtain temporary or seasonal agricultural/fishing work.
12. **Obtain** - When qualifying agricultural or fishing work was secured
13. **Seek/ Apply For** – When agricultural or fishing work is/was actively being pursued, yet has not been obtained.

14. **With** – When worker and qualifying child(ren) and/or youth make a qualifying move at the same time
15. **‘To Join’ Date** – In situations where the child and parent do not move together, the “to join” date is the day that the child and worker complete the move to be together. If the child’s move precedes the worker’s move, the qualifying arrival date is the date the worker arrived. The reason for this is that a move does not qualify until the worker arrives in the school district and begins to seek qualifying work. Therefore, it is only at this point that the child meets the definition of “migratory child”. On the other hand, if the child’s move followed the worker’s move, the qualifying arrival date is the date the child arrived. The reason for this is that the child does not establish eligibility as a migrant child until he or she physically arrives in the receiving school district.
16. **36 Months** – Length of eligibility based on the qualifying arrival date with the exception of graduation, age or death.
17. **OME** – (Office of Migrant Education) An office in the Department of Education that oversees, among other functions, the Identification & Recruitment and service of migrant children.
18. **MEP** – (Migrant Education Program) The federal program providing education funding for eligible migrant children.
19. **SEA** – (State Education Agency) The designated agency ultimately responsible for Identification & Recruitment of migrant children.
20. **LEA** – (Local Education Agency) The most immediate educational organization responsible for delivering ID&R, educational, and/or support services.
21. **GED** – (General Equivalency Diploma) An alternative diploma earned by a student.
22. **School District Lines** – An administrative boundary established independently by each state’s Department of Education.
23. **Age of Eligibility** – A child who is younger than 22 at the time of QAD and has not graduated from high school or does not hold a high school equivalency certificate/diploma.
24. **OSY** – (Out of School Youth) Migrant youth younger than 22 years of age who has not graduated from high school or does not have a GED and is not enrolled in school.
25. **Emancipated Youth** – Out of school youth under 22 years of age who does not live with a parent or guardian.

26. **International Moves** – For the purposes of the MEP, moves from a country other than Mexico or Canada if the primary purpose of the move was to enable the child, parent, guardian, or spouse to obtain temporary or seasonal employment in an agricultural or fishing activity.
27. **Temporary** – For the purposes of the MEP, employment in agriculture or fishing that lasts for a short time frame, usually no longer than 12 months.
28. **Seasonal** – Employment that is dependent on natural cycles. Planting, cultivating, pruning, harvesting, and related food processing are some examples of seasonal activities. Planting and harvesting clams and oysters, fishing during seasonal runs of fish, and related food processing are seasonal activities in commercial fishing.

APPENDIX F

Red Flags for COE reviewers

This document is provided for COE' reviewers to use in screening for possible errors. Pay close attention to:

- QAD dates after residency dates
- Incomplete addresses or phone numbers
- Children born after qualifying moves
- Incomplete birthdates
- Families that return each year- ensure information is consistent
- 12th grade students- ensure that they have not yet graduated.
- Note if qualifying work matches what types of work are known for the area where they appear to have made a qualifying move.
- To join moves
- Moves of short durations
- Certificate of Eligibility's (C.O.E) lacking required comments
- QAD not consistent with time of year for crop
- Correction of QAD or Crops/Activities
- Listing a series of temporary activities
- COE's with information that seems to disqualify a family
- Moves to a Home base City
- Move from city and move to city are the same
- Moves from a country other than Mexico or Canada
- Required comments for intent moves
- Unusual crops or activities

