Chapter 11. Quality Control in the ID&R System

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| Chapter 11 Learning Objectives |
| The administrator will learn |
| how to establish a quality control system; |
| how to establish a process for re-interviewing selected migratory children (families) each year; |
| how to establish a process for reviewing COEs, ensuring at least one second party reviews the COE prior to certification; |
| how to establish a process for resolving eligibility questions; and |
| how to develop procedures and standards for keeping records. |

Responsibility for Quality Control

Everyone has a role in quality control.

A core responsibility of each SEA is to ensure that only those children and youth who are truly eligible for the MEP are recruited, counted, and served. Each recruiter plays an important role in helping the SEA obtain the data it needs to make accurate MEP eligibility decisions and produce an accurate state child count. To that end, the SEA produces an annual Child Count Narrative that explains how the State counts only those children who met the program eligibility criteria and resided in the state for at least one day during the eligible period. Furthermore, the SEA is required to describe how it ensures the quality of all child eligibility determinations. One way this is ensured is through the federally-mandated re-interview process described in 34 CFR § 200.89(b). Meeting this re-interviewing responsibility is key to ensuring that (1) the SEA provides MEP-funded services only to eligible migratory children, (2) the MEP allocation each State receives reflects its statutory share of the MEP funding that Congress appropriates annually for services to migratory children, and (3) public confidence and the integrity of the MEP remains strong. Rigorous quality control should be applied to all components of the ID&R process to ensure accountability and accuracy at every stage.

Everyone who works in ID&R, including the recruiter and the administrator, is responsible for knowing the child eligibility requirements and ensuring quality control. The recruiter’s role—which includes conducting comprehensive eligibility interviews, filling out the COE adequately and accurately, and helping to make correct eligibility determinations—is discussed in detail in the previous chapters. The administrator has primary responsibility for ensuring that the quality   
control system works.

Overview of Quality Control

For the MEP, the key outcome of identification and recruitment activities is a “proper” and “timely” eligibility determination (not a COE).

The notion of quality control comes from the fields of engineering and manufacturing where products are tested during the manufacturing process to ensure that they consistently meet high standards. Quality control helps to maintain acceptable quality levels at the lowest possible cost. Similarly, the MEP seeks to develop efficient and cost-effective strategies for identifying all eligible migratory children and for making proper and timely MEP eligibility determinations confirmed via routine checks and balances.

Basic Principles. For the MEP, the primary focus of the quality control system is to determine whether or not only eligible migratory children are enrolled in the program. When the SEA qualifies an ineligible child or youth for the MEP, a defective eligibility determination has occurred. A strong ID&R quality control system will result in

* developing standard procedures that consistently result in correct MEP eligibility decisions;
* developing effective training programs to give recruitment staff the knowledge and skills needed to make correct MEP eligibility decisions;
* inspecting and testing MEP eligibility, particularly in areas where problems are the most likely to occur;
* taking corrective action when problems are found to make sure they do not   
  happen again; and
* receiving fewer complaints and maintaining public confidence by making sure   
  that federal dollars are spent on eligible children.

The purposes of quality control are to (1) ensure that the SEA's system of identifying children eligible for MEP services is working properly, (2) find children who have been incorrectly determined to be eligible for the MEP, and (3) identify where problems have occurred and to fix them. When an administrator finds an incorrect eligibility determination, the administrator should determine which part of the ID&R process failed and why. For example, the failure might have occurred because the recruiter did not ask enough questions during the interview, the interview was not translated properly, or the recruiter did not fully understand the eligibility criteria. Once the administrator knows what went wrong, he or she can use this information to improve the ID&R process by offering better training, meeting with recruiters more frequently, or providing clearer ID&R guidance.

Process-Oriented Quality Control. For purposes of the MEP, there are two kinds of quality control activities: “process-oriented” and “product-oriented.” Process-oriented quality control looks at each action a recruiter takes to determine whether a child is eligible for the MEP and attempts to pinpoint where errors are the most likely to occur. To explain how process-oriented quality control works, here is an example from the car manufacturing industry. Car manufacturers have inspectors who check each job within the plant to see if that job was done correctly. If a worker forgets to screw in a bolt when installing a headlight, that worker has made a process-oriented error, which may lead to a loose headlight.

To apply this same principle to ID&R, if a recruiter forgets to ask if every child in the family moved when conducting an interview, that recruiter has made a process-oriented error. This may lead to mistakenly enrolling a child in the MEP who is not eligible. Following are some other examples of process-oriented errors in determining child eligibility:

* not asking enough questions
* misinterpreting or not understanding some aspect of the law, regulations, or the NRG
* ignoring facts provided during an interview
* forgetting to ask if the family moved within the past 36 months

However, there are a number of things an administrator can do to reduce the number of process-oriented errors. Here are some examples of process-oriented ID&R quality control activities that will help to reduce process-oriented errors:

* hiring qualified recruiters
* providing orientation programs for new recruiters and ongoing training for all recruiters
* testing the recruiter’s knowledge of child eligibility rules
* providing tools to help the recruiter make correct eligibility determinations, such as the Sample Interview Script in Appendix VIII and the Child Eligibility Checklist in Chapter 7
* having the new recruiter observe knowledgeable and skillful recruiters conduct interviews with migratory families and youth and receive guidance and feedback from the experienced recruiters (“shadowing” and “coaching”)
* having the supervisor observe the recruiter as he or she conducts an eligibility interview, particularly during the first months on the job
* checking with the recruiter on a regular basis to make sure the recruiter is using a systematic, logical, and efficient interview process
* providing opportunities, such as during regular monthly meetings, for the recruiter and other recruitment staff to talk about situations they have encountered and discuss whether particular children are eligible for the MEP
* having the recruiter work with others, such as the administrator or knowledgeable recruiters, to make final eligibility determinations, particularly in difficult cases
* developing a recruiter ethics policy (see Appendix VII)
* providing incentives for reducing errors

Thus, to eliminate or reduce errors which can lead to defective eligibility determinations, administrators and recruiters must understand and accept that: (1) an error or mistake in the recruiting process can lead to an incorrect eligibility determination; (2) the overwhelming majority of errors are human errors; (3) to fix a problem, you must determine the source of the problem and learn from the mistake; and (4) detecting and correcting human errors quickly is critical to reducing the number and costs of incorrect eligibility determinations.

Product-Oriented Quality Control

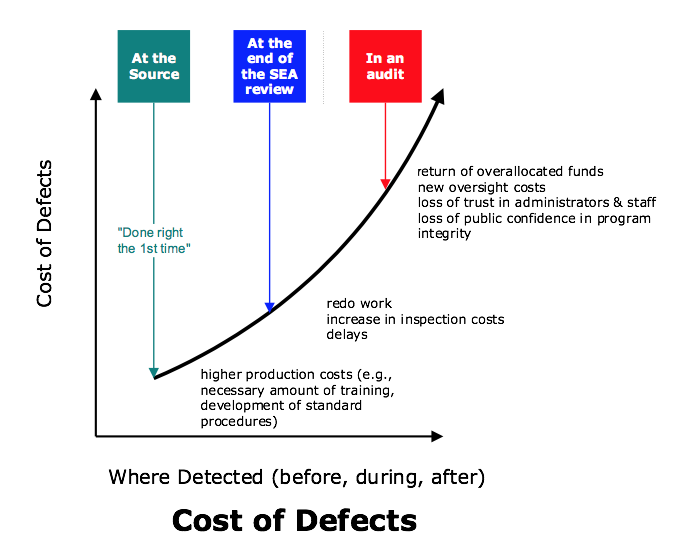
A “defect” is an imperfection that impairs worth or utility (of any type of product). [[1]](#footnote-2)

Product-oriented quality control activities examine the outcome or product to identify defects and suggest improvements. Product-oriented defects are usually identified after the activity or process has taken place—in this case, after the eligibility determination has been made. In the world of the MEP, product-oriented quality control usually refers to re-interviewing practices.

Administrators often ask the best way to discover defects. The answer is to inspect the final product. For example, a car manufacturer may test-drive a car to determine if it has any defects. Similarly, an administrator should arrange to have secondary reviewers check the accuracy of eligibility determinations after they are made. The best way to do this is by re-interviewing migratory families and youth to ensure that proper eligibility determinations were made. Re-interviewing is discussed in greater depth later in the chapter.

Figure 6 illustrates that, while there are costs associated with identifying problems at any stage of the ID&R process, these costs can be greatly reduced when errors (e.g., inefficient effort, ineligible children receiving MEP services) are prevented or caught early.

Figure 6. Cost of Defects In Comparison to Time of Defect Detection (Ghinato, 2008)



Detecting errors during the ID&R process can result in re-doing the work and delays in the ID&R of truly eligible children. However, identifying defective eligibility determinations after the ID&R process has been completed results in even greater costs. Identifying defects after funds have been spent on ineligible children can mean

* returning MEP funds that were allocated based on erroneous data;
* expanding costly oversight and quality control of ID&R processes;
* losing the trust of state and local administrators, OME representatives, other partners, and the general public; and
* experiencing the personal anxieties and troubles associated with audits and their aftermath.

Therefore, administrators should make a concerted effort to catch problems early when they are easier and less costly to correct. It is always better to perform tasks “right the first time.”

For the reasons discussed in this section, it is essential to inspect both (1) the process used to make child eligibility determinations and (2) the actual product, or the child eligibility determination itself. It is important to make correct eligibility decisions to avoid diverting services from truly eligible and deserving migratory children and incurring the costs of corrective actions that are required as a result of program monitoring or audit.

Quality Control Tools. SEAs may require local projects to implement quality control strategies to ensure the integrity of eligibility information. SEAs and LOAs can use instruments such as the COE Review Checklist in Appendix XII and COE flowchart (presented later in this chapter) as they design their own quality control process. SEAs may find the Sample Interview Script in Appendix VIII useful in developing their own re-interview script and may also want to read through the quality control process described later in this chapter.

Quality Control in ID&R

I gather all of my recruiters at weekly meetings to discuss the interviews they conducted during the previous week. We talk about the eligibility decisions they have made – both the children that they qualified and the children that they did not qualify. This is a great learning experience for everyone and increases the consistency of our eligibility decisions.

In accordance with the requirements published in 34 CFR § 200.89(b)(2), an SEA must establish minimum requirements for a system of quality controls that an SEA must implement in order to promote accurate migratory child eligibility determinations. Quality control is needed to ensure that only eligible children and youth are identified, recruited and enrolled in the MEP. This is of utmost importance as state and local MEP funding is based on the number of children and youth identified and recruited into the program. The various components of a quality control system are discussed below.

Training the Recruiter. 34 CFR § 200.89(d) of the regulations maintains that training is required to ensure recruiters and all other staff involved in determining eligibility and in conducting quality control procedures know the requirements for accurately determining and documenting child eligibility under the MEP.

Therefore, the first important component of a quality control program is providing high quality training for new recruiters and experienced recruiters alike. As discussed in Chapter 9, the SEA and/or regional offices should train recruiters at least annually on child eligibility requirements, and the training should be a combination of classroom and field based training, as well as independent study. This training should cover the child eligibility factors, as well as issues like purpose of the move, moved for economic necessity, temporary vs. seasonal, processing, etc. Administrators may be able to minimize the number of problems that are identified through re-interviewing by providing effective training.

Supervision and Evaluation of Individual Recruiters. 34 CFR § 200.89(d) of the regulations maintains an SEA’s system of quality control must include supervision and annual review and evaluation of the identification and recruitment practices of individual recruiters.

As discussed in Chapter 9, it is important to hire recruiters who are self-starters and can work productively on their own. However, supervisory support and the development of a team are both critical for the recruiter to avoid feeling alone or isolated.

Supervisory Support. The administrator should maintain regular contact with the recruiter in the field to dispel any feelings of isolation the recruiter may experience. Many recruiters work out of their homes, drive their cars for most of the day in rural areas, and knock on the doors of people who may not be at home. Many have no officemates and their administrator may be located hours away. Some describe recruitment as a lonely job. It is important for the recruiter to know that someone is interested in and understands the work. Furthermore, the new recruiter, in particular, needs regular feedback on whether he or she is making correct preliminary child eligibility determinations, particularly during the first few months on the job. A Motorola Inc. study showed that new employees were more likely to retain the knowledge and skills they learned during initial training if managers provided coaching and support as the skills were being applied (Clemmer, n.d.). Therefore, the administrator should continually reinforce the key lessons learned in the basic classroom training.

There are a number of ways the recruitment administrator can stay in regular contact with the recruiter in the field, including weekly phone calls or Skype, emails (personal emails, not group emails), and field visits by the administrator or designee who is not part of a monitoring review.

The administrator should set aside funding in the budget to spend a certain number of hours in the field with recruiters each month. Regular contact not only helps dispel feelings of isolation, but also helps to build a positive rapport between the recruiter and the administrator. This increases the likelihood that the recruiter will contact the administrator when a question, ethical dilemma, or problem arises.

As part of planning and deploying, the administrator should work with the recruiter to set up a recruitment schedule that uses time wisely. In particular, the administrator should provide the following support to the recruiter:

* an ID&R system which supports school- and field-based recruiting
* flexible hours to allow for meeting and interviewing when families or youth are available or to attend evening meetings
* sufficient mileage (consider that recruiters might need to visit several families before they find one who is eligible, and they need enough mileage to visit members of their recruitment network)
* time to survey/canvass the area before expecting the recruiter to produce COEs
* time for training or professional development

For accountability purposes, the administrator may ask the recruiter to complete an activity log to account for the recruiter’s time.

Performance Assessments. The administrator should regularly observe and provide feedback to the recruiter. New recruiters, in particular, want to do a good job and want to understand what the administrator expects of them. Observing the recruiter helps the administrator understand how the recruiter approaches interviewing migratory families and youth and whether it is likely that the recruiter is making correct eligibility determinations. Observing the new recruiter during the early stages of the work is particularly important so that problems can be corrected early on before they become habits. Providing specific examples of employee behavior makes both praise and constructive feedback more effective.

Performance assessments also offer the administrator a chance to see whether the new recruiter, who is looking at the state and local ID&R systems with “fresh eyes,” has suggestions for improving ID&R efforts. Furthermore, assessment meetings provide an opportunity to identify the recruiter’s training and development needs to increase the recruiter’s productivity. The recruiter should be encouraged to conduct self-evaluations by talking with migratory families, school officials, agricultural employers, and members of the recruiter’s network to get ideas on how to be more effective.

Reviewing the COE

We have a COE review and approval team. They look at the COEs that have been returned and develop a report on recurring problems that can be addressed in training.

34 CFR § 200.89(d) of the MEP regulations provides that an SEA’s system must have an examination by qualified individuals at the SEA or LOA level of each COE to verify that the written documentation is sufficient and that, based on the recorded data, the child is eligible for   
MEP services.

Reviewing the COE prior to processing is a required early step a state takes to test the validity of eligibility determinations. For many administrators, a primary component of the COE review is reading and reviewing the supplemental interview form along with the more formal COE. The administrator, peer, or other designated reviewer should verify that the eligibility data recorded on   
the COE is consistent with the supplemental interview form and adequate to document the child or youth’s eligibility for the MEP. Incomplete or otherwise questionable COEs should be returned to the recruiter for correction, further explanation, better documentation, and/or verification. The MEP regulations require SEAs to have a review process in place that examines the validity of the COE by having all completed COE forms reviewed by at least one additional person before the information is entered into the State’s migratory student database. Some of the steps that a COE review may cover at different levels include:

* The recruiter reviews the COE with the parent or other interviewee at the time of the interview to make sure that the information recorded on the COE is correct.
* A trained administrator, peer reviewer, or other trained staff member checks the COE before the data is entered into the migratory student database (some states require both the recruiter and the administrator to be trained and certified by the SEA annually). The reviewer often finds errors related to dates (e.g., transposed numbers), incomplete sections, and eligibility errors (e.g., residency date before the QAD, children born after the move).
* After the initial review, the data entry specialist (DES) checks the COE. A DES can catch even more errors involving numbers. For example, many databases will not allow the information to be entered if it does not make sense (transposed digits in a birth date, for instance). Also, the DES has access to the entire state database, whereas many recruiters and administrators do not. Because the DES has all the student’s previous entries they may see a wrong DOB whereas a reviewer would not have known the DOB is wrong.
* The state monitor randomly selects a sample of completed COEs for re-interviewing.

The flowchart in Figure 7 examines the process of completing and reviewing a COE. The COE review process varies from state to state and can be influenced by factors, such as

* the number of migratory children,
* the number of COEs,
* the size of a region,
* regional resources, and
* available technology.

Figure 7. COE Review Flowchart

A signed copy of the COE is filed in central or regional location; COEs may be maintained electronically.

The DES enters the COE information into the state student database.3

If the COE is approved, it is sent   
back to the DES.

A supervisor or designee1 reviews the COE.

The DES reviews the COE   
for completeness.

The Data-entry Specialist reviews the COE for completeness.

The recruiter sends the COE to the central   
MEP office or LOA.

The recruiter confirms the data on the COE with   
the family or youth.

The recruiter interviews the family or youth and   
completes the COE.

A copy of the COE is sent to the LOA.

A copy of the COE is sent to the family (optional).

If the COE is not approved, it is sent back to the recruiter for correction.2

If necessary the recruiter will verify data with family, or make corrections and send the COE   
back to the LOA.

1 In small states, the supervisor or designee, and state COE reviewer may be the same person.

2 If the DES finds an error, the COE may be sent back to the LOA and then the recruiter.

3 Depending on the volume of COEs, states may opt to file them at regional offices or at the   
central location.

Many states use a reviewer checklist as a tool to help the reviewer ensure that the COE has been completed correctly (see Appendix XII). Having a checklist readily available during an interview makes it easier for the recruiter to conduct frequent self-assessments and participate fully in the COE review process. A COE reviewer checklist looks at items like the following:

* completeness and accuracy (all blanks are filled out, dates appear correct, required comments are complete, names appear to be spelled correctly, nicknames are not   
  used, etc.); and
* eligibility determination appears valid (all of the eligibility data appear reasonable, the qualifying work is well documented, and comments are clear).

Some states generate reports that list the numbers and types of mistakes that have been found on COEs. The report is sent to the recruiter so the recruiter can see the types of mistakes made most frequently. The recruiter might want to keep a collection of these reports in a portfolio as a reference tool for professional development. Other states discuss mistakes at their weekly or monthly recruiter meetings or during training.

To correct errors found on COEs, the reviewer typically sends the COE back to the recruiter with a note indicating where the mistake was made and asking for clarification. Even though many mistakes may be simple for the reviewer to correct, it is advantageous to send the COE back to the recruiter for two main reasons:

* Inaccurate assumptions. The reviewer may want to correct seemingly erroneous information on a COE such as a misspelled last name or an unusual qualifying activity. However, the information may be correct, even if it is unusual. The reviewer should have the recruiter verify the accuracy of the information rather than assuming it is a mistake.
* Repeated mistakes. When the reviewer corrects repeated “simple mistakes” made by a particular recruiter, such as not completing dates or leaving lines blank, the recruiter does not realize that mistakes were made and will not learn to complete the COE properly.

Establishing State Policies. Some aspects of child eligibility are determined by state laws, regulations, or policy rather than federal laws or regulations. A prime example of this is the meaning of the term “school completion.” Under federal law, a migratory child can be served as long as that child is still entitled to a free public education in his or her state (see sections 8101(3) and 8101(21) of the ESEA, as amended, and 34 CFR § 200.103(a)(1). However, states have different rules regarding when a child is considered to have completed high school. For example, here are three factors to consider:

1. Age beyond which a child is no longer entitled to a free public education. Some states have established an upper age limit for when a child stops being entitled to a free public education. In situations such as these, the LOA must enforce such limits. The state MEP must determine whether there is an age limit on how long children are able to attend school in that state or if it is a local decision. Regardless of the age limit set by the SEA or LOA, the ESEA does not permit students to be considered eligible for the MEP after they have turned 22 years of age.
2. State requirements for “school completion.” Each state sets its own requirements for high school diplomas, HSED tests, and “Certificates of Completion,” so these requirements vary state to state. Under some state laws, having been awarded a HSED, a certificate of completion, a certificate of course completion, or a certificate by any other name does not terminate a person’s right to pursue a high school diploma. In other states, the opposite is true. The SEA must determine whether degrees other than a high school diploma terminate a child’s right to continue to attend high school in that state, and if so, which degrees are considered terminal.
3. State rules with regard to treatment of degrees from other countries. States have different rules regarding whether a child who has received a high school diploma or degree in the child’s home country (e.g., the preparatoria in Mexico) is eligible to obtain a U.S. high school diploma. The SEA needs to identify which degrees from other countries, if any, would prevent a child from being entitled to receive a free public education in order to attend high school in that state.

Each state MEP must research its own state laws, regulations and/or policies to determine the rules in each of these areas. Based on this research, the state MEP should establish a clear policy on what constitutes school completion and communicate that policy to recruiters.

Resolving Eligibility Questions

34 CFR § 200.89(d) of the regulations maintains that an SEA must have a formal process for resolving eligibility questions raised by recruiters and their supervisors and for ensuring that this information is communicated to all LOAs.

Some States have found it useful to form state or regional eligibility policy teams made up of the ID&R Coordinator, experienced recruiters, and/or ID&R staff to resolve eligibility questions. When a new policy question is raised, the team leader (generally the ID&R Coordinator) investigates to learn whether that question or a similar question has been answered in the NRG, state ID&R Manual, past correspondence, or by peers in other districts or states. If the question has been answered previously, the answer is sent to the questioner. If it has not been answered previously, the team discusses the question to determine whether they are comfortable answering the question based on the law, regulations, and the NRG. If the team cannot come to an agreement, the question is either resolved by the ID&R Coordinator or moved to the next administrative level.

Questions that deal with statutory or regulatory requirements and are broad in scope (i.e., affect the eligibility of many children in the state) should be referred by the State to OME. For questions that are sent to OME, the SEA should provide as much background information as possible, including all relevant facts that would affect the eligibility determination, and the number of children whose eligibility would potentially be affected. The SEA should also provide its analysis of the question and its proposed response.

When the SEA answers a question on its own or when it receives a response from OME, the SEA must communicate these answers not just to the recruiter or local MEP that asked the question, but to all LOAs to ensure consistent ID&R statewide. The SEA also should keep a log of these questions and responses in a portfolio for later reference and/or for training purposes. For more information on this topic, see the section on Determining Eligibility in Difficult Cases in Chapter 7.

Validating Child Eligibility

*I pull every 10th new COE and re-interview that family. I tell the family that I’m checking on the quality of our recruitment system and that I will send them a book as a thank you for letting me re-interview them. The Reading Is Fundamental program donates the books. By re-interviewing families right after the COEs come in, I can correct any problems we find immediately. That way recruiters know right away if they are doing something wrong.*

34 CFR § 200.89(d) of the MEP regulations provides that an SEA must have a process for validating that eligibility determinations were properly made, including conducting prospective re-interviewing as described in paragraph (b)(2). They must have documentation that supports the SEA's implementation of this quality-control system and a record of actions taken to improve the system where periodic reviews and evaluations indicate a need to do so. Finally, an SEA must also have a process for implementing corrective action if the SEA finds COEs that do not sufficiently document a child's eligibility for the MEP, or in response to internal state audit findings and recommendations, or ED monitoring or audit findings.

Figure 8. Steps in Validating Child Eligibility

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| Steps in Validating Child Eligibility |
| 1. Inform administrators about the re-interviewing process. 2. Determine which families will be re-interviewed. 3. Decide who will conduct the re-interview. 4. Develop an interview protocol. 5. Train the interviewer. 6. Interview the family. 7. Determine if each child or youth is eligible for the MEP. 8. Resolve any problems that are identified. 9. Develop a process for recruiters to provide additional evidence, information, or documentation. 10. Determine defect rate. 11. Summarize problems and identify their causes. 12. Document the process. |

One way that SEAs and districts confirm the quality of eligibility determinations is by annually   
re-interviewing the families of currently eligible children. This process is referred to as prospective   
re-interviewing. As stated above, MEP regulations require each the SEA to have a process for re-interviewing a sample of migratory children each year. For a detailed explanation of how to conduct prospective re-interviewing see Section III of the OME Technical Assistance Guide on Re-interviewing.

In general, OME recommends that

Each recruiter has at least one randomly selected eligibility determination checked each year. The re-interview should be conducted shortly after the initial interview as (1) the interviewee will be easier to locate, (2) it will be easier for the interviewee to remember what he or she said in the original interview, and (3) the program can catch and correct mistakes more readily.

The SEA must maintain documentation regarding (1) how the quality control process was implemented, (2) what the findings were, and (3) how they were resolved.

When conducting re-interviews, the SEA may want to consider the following activities:

1. Inform administrators about the re-interviewing process. Each state and/or local MEP administrator should speak with his or her supervisor to ensure that the supervisor understands that migratory families will be re-interviewed and the methodology that will be used. For example, if the MEP is located in the federal programs unit within the SEA, the state MEP Director would want to inform the federal programs director. Similarly, local MEP administrators would want to inform appropriate local officials (e.g., school superintendent, principal, federal programs director, regional director). Having clear lines of communication is useful in the event that the re-interview identifies children who are not eligible for the MEP, since further action will be required.
2. Determine which families will be re-interviewed. SEAs need to determine how many families will be re-interviewed and develop a process for selecting families (including replacing families who cannot be located or who refuse to be interviewed). SEAs are encouraged to consult with a sampling expert to determine the sample university, sample timing, and the selection of random sampling method.

SEAs should be careful not to let recruiters or other LOA staff know which families will be re-interviewed to reduce the opportunity to “coach” families who made the list (i.e., suggest how they should respond to re-interview questions). The SEA may wish to notify LOAs that some migratory families will be re-interviewed. However, SEAs should decide whether to provide advanced notification to either the families to be visited or to the original recruiter.

1. Decide who will conduct the re-interview. SEAs can use their existing recruitment staff as re-interviewers two out of every three years. Every third year, the SEA must hire one or more independent interviewers to conduct the re-interviews (i.e., someone who was not associated with the original eligibility determination or an interviewer who is not employed by the MEP at either the SEA or LOA level). During the non-independent years, SEAs should use staff who are as independent as reasonably possible. At a minimum, the recruiter and reviewer who were involved with the original eligibility determination should not be part of the re-interview. Some examples of individuals who can be used to conduct re-interviews during the non-independent years include recruiters from another region or district in the state, the state ID&R Coordinator, and recruiters from another state. Examples of individuals who can be used to conduct independent re-interviewing include retired MEP staff, SEA staff (e.g., audit staff or staff from other programs), staff from the Regional Educational Laboratories or Comprehensive Assistance Centers, outside consultants, recruiters from other states, temporary recruiters, or staff from other programs that serve migratory children (e.g., Migrant Health, Migrant Head Start). If the individual who conducts the re-interview does not speak the family’s native language, a translator will also be needed.

States may want to have MEP staff introduce the re-interviewer to the parent. This can be done through a reminder note or advance phone call. The interviewer can also reassure families by explaining that the purpose of the re-interview is to check on interviewers or to determine whether the State’s ID&R training works as desired. Interviewers should be honest with families and clearly inform them that they might lose services because of their answers and let them know that there is an appeals process. This process is more likely to be understood by families as quality control measures become institutionalized. A good way that states can be proactive about re-interviewing is to let families know upon recruitment that they might be asked to participate in a second interview.

SEAs should be on the lookout for recruiters who have engaged in fraud (i.e., have   
made intentional errors) or have coached families on how to respond. The purpose of   
re-interviewing is to verify child eligibility determinations. If problems are discovered,   
they must be addressed.

1. Develop an interview protocol. The interview protocol includes determining how migratory families will be contacted, what they will be asked, and how the re-interviewer will document the answers. The SEA may modify a supplemental interview form (see Appendix VIII), as explained in Chapter 6, for the purposes of re-interviewing. The interviewer should ask open-ended questions similar to those below and supplement them with additional probes that help get at whether the family moved due to economic necessity or meets the definition of migratory agricultural worker or migratory fisher. The interviewer should NOT ask leading questions or ask the family member to simply confirm information that is recorded on a COE. The OME Technical Assistance Guide on Re-interviewing includes several tools and examples to assist with prospective re-interviewing.
2. Train the interviewer. The interviewer needs to be trained on the interview protocol and the MEP eligibility requirements. A number of states have formed eligibility teams that are made up of knowledgeable staff who can discuss difficult eligibility cases and determine whether the child or youth is eligible for the MEP (see additional information below).
3. Interview the family or youth. Interviews should be conducted at a time that is convenient for the family or youth. This may mean conducting the interview during evening and weekend hours or during breaks in the family’s workday. The re-interview can be conducted at the home, the workplace, the school, or any other mutually agreeable location.
4. Determine if each child or youth is eligible for the MEP. After the re-interview is completed, but before leaving the family, the interviewer is encouraged to compare the information on the original COE to the information provided during the re-interview. If discrepancies exist, the interviewer may probe further with the family, being careful to continue to use open-ended questions and not to divulge eligibility information provided previously (in some cases, workers may be reluctant to admit to having qualifying employment because they were paid in cash and did not file taxes or because they do not have a valid work permit). After all of the interviews have been completed, eligibility determinations that are not clear can be discussed and resolved by the state eligibility policy team using a process like the one described in the section entitled Resolving Eligibility Questions found earlier in this chapter. During the year that the SEA hires independent interviewers to carry out the process, eligibility determinations that are not clear can be brought to an independent person or group.
5. Resolve any problems that are identified. If there are mistakes on the original COE that do not affect the child’s eligibility, the mistakes should be corrected or a new COE should be completed. Some SEAs make changes to the hard copy of the COE in red ink so the change is clearly visible and it is clear that the change was made during the re-interview. Most SEAs require all revisions to be initialed and dated. The information must also be corrected in the State’s migratory student database.

If a child is found to be ineligible, the SEA must do the following:

* 1. Stop serving the child immediately.
  2. Remove the child from the state child count (leave the child in the migratory student database, but change the child’s code to “inactive” or “ineligible”).
  3. Inform the family that the child is not eligible for the MEP.

Furthermore, the SEA should contact OME to determine if any further steps are necessary (e.g., return funds to the state’s MEP account if MEP funds were used to serve non-eligible children). Cases of fraud must be reported to the OIG.   
  
If a particular recruiter has made errors, the SEA should investigate additional eligibility determinations made by that recruiter. Repetitive errors may indicate that additional training is needed or may indicate fraud on the recruiter’s part. In either case, the SEA should be prepared to make use of the appropriate remedy.

1. Develop a process for recruiters to provide additional evidence, information or documentation. SEAs should develop a process whereby the recruiter can provide additional evidence, information, or documentation to support an eligibility determination   
   that has been questioned (e.g., pay stubs, employment records). Based on this additional information, the State can review both the original eligibility determination and the determination from the re-interview to make a final determination.
2. Understand the difference between a defect vs. a discrepancy rate. OME uses different terms to describe the percent of ineligible children found during retrospective vs. prospective re-interviewing. The term defect rate is used for retrospective re-interviewing, and the term discrepancy rate for prospective re-interviewing. In conducting retrospective re-interviews and calculating a defect rate, an SEA must construct its sample size so that it achieves a minimum confidence level of 95 percent and a confidence interval no larger than plus or minus 5 percent. See 34 CFR § 200.89(b)(1)(iii) and (b)(2)(ii) and OME’s Technical Assistance Guide on Re-Interviewing on page 57. In conducting prospective re-interviews and calculating a discrepancy rate, an SEA must test a sufficient number of randomly selected eligibility determinations on a statewide basis or within categories associated with identified risk factors to help identify possible problems with the State’s eligibility determinations; note, however, that when calculating a “discrepancy rate” for prospective re-interviewing it is not necessary to the meet the minimum requirements for confidence level and confidence interval that apply when calculating a “defect rate.” See OME’s Technical Assistance Guide on Re-Interviewing on page 3. The following example can be applied to the calculation of both defect and discrepancy rates using the correct samples size for the particular re-interviewing method used. For example, if an SEA looked at 100 eligibility determinations as part of the re-interview process, and eight of the children were found to be ineligible, the defect or discrepancy rate would be 8% (8 divided by 100). If only one child from a family was selected as part of the re-interviewing sample, but all of the children in the family were reviewed and determined to be ineligible, the SEA should remove all of the ineligible children from the child count. However, only the child who was selected as part of the re-interviewing sample should be included in the calculation of the defect or discrepancy rate.
3. Summarize problems and identify their causes. Children can incorrectly be qualified for the MEP because of fraud (i.e., intentional error), mistakes in interpreting eligibility rules, or simple misunderstandings of the family’s history. OME does not consider minor errors in the documentation of an otherwise eligible migratory child or youth (such as an imprecise QAD recorded on a COE) to be a defective eligibility determination. Still, SEAs should correct common documentation errors and address them in recruiter and administrator trainings. On the other hand, errors that affect eligibility should definitely be recorded and the reason that the error was made should be identified. Furthermore, SEAs need to develop a corrective action plan to address problems in making proper eligibility determinations that these errors highlight.
4. Document the process. SEAs must maintain documentation of the re-interviewing process (e.g., sampling frame, selection and replacement procedures, the sample of children, instructions and materials given to interviewers, meeting notes, re-interview notes, problems identified, corrective actions, etc.). OME may ask to examine documentation of a state’s quality control process during a monitoring review.

Monitoring Eligibility

The purpose of monitoring is to verify that currently enrolled children are eligible to receive MEP services. SEAs may use state staff or independently hired consultants to monitor and review eligibility determinations. Also, state and local MEPs may conduct “peer reviews” to assess their ID&R activities (performed by peer reviewers/experienced recruiters, often from other regions). By conducting peer reviews, state and local MEPs may determine if their ID&R plans and other efforts are being implemented properly.

In addition, LOAs can contribute to quality control by monitoring their own ID&R efforts using the same procedures and instruments employed at the state level. The accountability and quality control of programs can be improved by periodically scheduling state and local monitoring reviews. The scheduling of regular peer reviews and monitoring visits helps recruitment staff become less apprehensive and intimidated by more formal state or federally mandated reviews.

After a review, the State can ask the LOA to provide the following information as a record of the monitoring visit:

* completed monitoring instruments
* copies or lists of reviewed COEs
* results from re-interviewing families
* copies of other reviewed forms
* copies of correspondence between the SEA and the LOA regarding the review, including any actions taken

In monitoring, SEAs usually select the number of COEs to be reviewed based on the total number of children currently enrolled in the district. If the SEA does not have a pre-established acceptable defect rate from the more formal retrospective re-interview initiative, OME considers a reasonable statewide random sample to be about 50. Since it may be impossible to review all of the documentation in certain situations (i.e., large states or regions), SEAs should randomly select the COEs to be reviewed for monitoring purposes.

Report Fraud or Misconduct. The administrator should provide recruiters with the State’s policy for reporting fraud or misconduct. If the administrator suspects fraud, waste, or abuse involving ED funds or programs, the administrator should call or write to the OIG Hotline using any of the following methods:

* Call the OIG Hotline’s toll free number 1-800-MIS-USED. The Hotline's operating hours are from 9:00 a.m. until 4:00 p.m. Eastern Time, Monday through Friday, except for holidays.
* Send an email message to [oig.hotline@ed.gov](mailto:oig.hotline@ed.gov).
* Complete and submit an electronic complaint form (<https://www2.ed.gov/about/offices/list/ocr/complaintintro.html>).
* To ensure complete anonymity, download a hard copy of the complaint form (<https://www2.ed.gov/about/offices/list/ocr/complaintform.pdf>), complete, and mail to:   
  **Inspector General's Hotline; Office of Inspector General;   
  U.S. Department of Education; 400 Maryland Avenue, SW; Washington, D.C.   
  20202-1510.**

As mentioned previously, fraud is a crime; intentional falsification should be taken seriously by everyone and should be reported immediately.

Evaluating and Improving. The SEA should have a process for implementing recruiter recommendations and corrective actions in response to the re-interviewing process, the evaluation results, and internal monitoring findings. SEAs should use the results of their quality control system to determine where improvements are needed and develop an action plan for implementing those improvements. Areas where improvements are often needed include improved training and greater oversight of recruiters, particularly new recruiters.

Recordkeeping. As with any federally funded program, the MEP requires a high degree of accountability and recordkeeping. The child’s record of eligibility, identified needs, and the services provided should be documented and maintained either electronically or in a paper file. Since the MEP serves children and families who cross school district and state boundaries frequently, these records should be available in case they need to be exchanged among programs.

* What Records to Keep. Some records (such as the COE) are kept because they document the child’s eligibility for the MEP, while other records are kept to satisfy state needs or requirements (such as past and present action plans, manuals and training materials). For example, some states require the recruiter to maintain logs that document the amount of time spent on recruitment activities. For staff who are split-funded or have other responsibilities, the SEA must ensure that, consistent with cost principles contained in the Uniform Guidance (<https://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl>), 2 CFR Subpart E,the amount of time spent on recruitment matches the percentage of the person’s salary that is supported by the MEP. SEAs may also require mileage logs to support mileage reimbursement. Moreover, states may keep client services reports, educational assessment results, and other documentation that MEP services were provided.
* Where to Keep Records. Each SEA should have clear procedures for updating, filing, storing, and securing COEs. Larger states, for example, are likely to have their COEs stored at regional service centers, rather than at the SEA MEP office. Smaller states, on the other hand, might have all their COEs stored at the SEA office because the volume of COEs is more manageable. Each SEA should devise a system that is secure, efficient, accurate, affordable, and readily available for any audit or monitoring review. With the increase of scanning technology and electronic COEs, storing and filing documents has become easier for the MEP. In addition, electronic signatures for recruiters and reviewers may now be an option.
* How Long to Keep Records. Generally, records must be maintained for three years after the date the grantee or local operating agency submits its last expenditure report for the period in question. (See the Uniform Guidance 2 CFR § 200.333 Retention Requirements for Records.) If any litigation, claim, negotiation, audit, or other action involving the records has commenced before the expiration of the three-year period, the records must be retained until completion of the action and resolution of all issues that arise from it, or until the end of the regular three-year period, whichever is later.

The length of time that an SEA must keep a COE depends on whether the child makes subsequent qualifying moves, which will increase the amount of time. For example, a COE that indicates that a child made a qualifying move in October 2012 means that the child will remain eligible, without another qualifying move, until October 2015. A child eligible in October 2015 would be included in the Category 1 child count for the period September 1, 2015–August 31, 2016 and would generate FY 2017 funding for the State. FY 2017 funds may be used, with carryover, until September 30, 2019. The SEA does not need to submit the final expenditure report for these funds to ED until as late as December 31, 2019. The three-year record retention period begins in December 2014 when the SEA submits the final expenditure report and runs until December 31, 2019. Therefore, the SEA would have to keep this particular COE until December 31, 2022. (NRG, Ch. XI, C3.)

The COE is the primary means of documenting a child’s eligibility for MEP services. For this reason, the SEA should take particular care to keep COE data safe, secure, and readily accessible.

Conclusion

Quality control and monitoring are tools that will keep an ID&R system in good working order. The administrator responsible for ID&R, either at the state or local level, will make decisions about how much time and effort to invest in the task. Those who ignore or minimize their efforts do so at their own risk and at the program’s peril. SEAs must have a well-defined quality control process that trains recruiters, examines the validity of COEs, and re-interviews families to test underlying eligibility determinations. Having rigorous and effective quality control procedures will protect the integrity of the program and ensure that only eligible migratory children benefit from the MEP.

1. Merriam-Webster (2017). Defect. Retrieved from https://www.merriam-webster.com/dictionary/defect [↑](#footnote-ref-2)