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Office of Migrant Education (OME)

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

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PRESENTERS

Ray Melecio

Louisiana MEP ID&R

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OBJECTIVES

- To improve understanding of the basic requirements for annual prospective re-interviews and other ID&R quality control measures;
- 2. To expand awareness of existing flexibilities for conducting reinterviews, ID&R outreach, and eligibility interviews during the coronavirus pandemic; and
- 3. To facilitate a discussion among Title I, Part C Migrant Education Program (MEP) practitioners regarding effective ID&R strategies in the current environment.

REFERENCES

Statute

Sections 1115(b) and (c), 1304(c)(2), and 1309 of the *Elementary and Secondary Education Act* (ESEA) of 1965, as amended

Code of Federal Regulations (CFR)
 34 C.F.R. 200.81, 200.103(a), and 200.89(b)(2), (c) and (d)
 National Certificate of Eligibility (COE) Instructions (OMB Control Number 1810-0662)

- Guidance and Technical Assistance Materials
 - Chapters II and III of the Non-Regulatory Guidance for the Title I, Part C Education of Migratory Children
 - Technical Assistance Guide on Re-interviewing
 - ID&R Manual and Curriculum
 - New Directors Orientation Tutorial #2
 - MEP Policy Questions and Answers search "Identification and Recruitment"

see https://www.RESULTS.ed.gov

PROSPECTIVE RE-INTERVIEWING

WHAT IS PROSPECTIVE RE-INTERVIEWING?

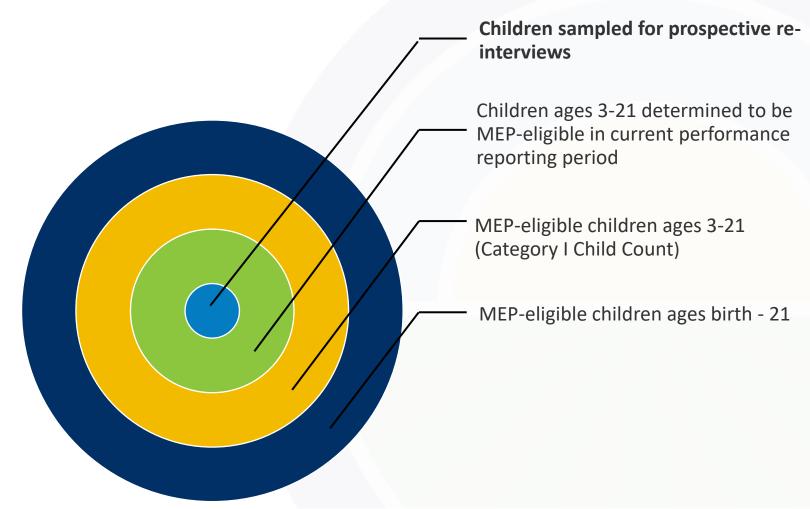
- Prospective re-interviewing is the process of verifying MEP eligibility determinations by conducting a second interview with migratory families from a sample of migratory children.
- Designed to provide an early warning of problems in the State's eligibility determination process so that State Educational Agencies (SEAs) can take action to fix such problems.

PROSPECTIVE RE-INTERVIEWING: TIMING

- Prospective re-interviews are conducted annually; and
- Completed before the SEA submits its child counts to the U.S.
 Department of Education (the Department) for that year.
- The Department recommends that States conduct re-interviews on a rolling basis throughout the year, to maximize the chances of successfully contacting a family.

PROSPECTIVE RE-INTERVIEWING SAMPLE

The sample is drawn from migratory children ages 3-21 that the State identified as MEP-eligible during a single performance reporting period (September 1 – August 31).



PROSPECTIVE RE-INTERVIEWING SAMPLE (CONTINUED)

- Random sample
- Sample may be Statewide or focused on risk categories (e.g., experience of recruiters, size or growth of local migratory child population)
- Sample size depends on several factors, including the size of the sampling universe and history of discrepancies/errors
- 50 is an average not a one size fits all!
- Important to account for non-response (families that cannot be contacted, are unavailable, or refuse to participate) when selecting sample

34 C.F.R. § 200.89(b)(2)(ii); section III, pgs. 11-29 of *Technical Assistance Guide on Reinterviewing*

PROSPECTIVE RE-INTERVIEWERS

- One or more re-interviewers
- Trained to conduct personal interviews and apply MEP eligibility requirements
- Must not have worked on the initial eligibility determination
- May be State or local MEP staff— except when independent reinterviewers are required.

34 C.F.R. § 200.89(b)(2)(i); section III, pgs. 30-39 of *Technical Assistance Guide on Re-interviewing*

PROSPECTIVE RE-INTERVIEWERS (CONTINUED)

- In addition to being trained to conduct interviews and apply MEP eligibility requirements, re-interviewers should also:
 - Speak the language of the family to be re-interviewed (or be provided assistance);
 - Be knowledgeable about and sensitive to cultural aspects of the migratory lifestyle and migratory families
- No requirement that re-interviewers be trained in person
- It is acceptable to have a MEP staff person known to the family provide an initial introduction to the re-interviewer. Staff that conducted the initial interview should not be present during the re-interview, as this may influence the family's answers.

INDEPENDENT PROSPECTIVE RE-INTERVIEWERS

- Independent re-interviewers may not be State or local MEP staff.
- Acceptable independent re-interviewers include, but are not limited to:
 - ID&R staff from other States
 - Retired MEP staff
 - Consultants (independent or consulting groups)
 - University students/staff
 - SEA or LOA staff administering other programs

(34 C.F.R. § 200.89(b)(2)(i)(A) and (B); section III, pgs. 30-39 of *Technical Assistance Guide on Re-interviewing*)

INDEPENDENT PROSPECTIVE RE-INTERVIEWERS (CONTINUED)

- At least once every three years until September 1, 2020, the SEA must use one or more independent re-interviewers.
- Beginning September 1, 2020, independent re-interviewers are only required following a major statutory or regulatory change that directly impacts eligibility.
- **Self-check**: Did your State use independent re-interviewer(s) during the 2017-18, 2018-19, or 2019-20 performance reporting periods?

PROSPECTIVE RE-INTERVIEWS: AFTER ACTIONS

- Determine and document in writing whether the child eligibility determination and the information on which it was based were true and correct;
- Stop serving any ineligible children and remove them from data base;
- Certify and report to the Department the results of reinterviewing in the annual Consolidated State Performance Report (CSPR); and
- Implement corrective actions or improvements to address problems

(34 C.F.R. § 200.89(b)(2)(iv)-(vii))

OTHER ID&R QUALITY CONTROLS

MINIMUM COMPONENTS OF ID&R QUALITY CONTROL

- 1. Training for recruiters and all other staff involved in determining eligibility.
- 2. Supervision and annual review and evaluation of the ID&R practices of individual recruiters.
- 3. A formal process for resolving eligibility questions and for ensuring that this information is communicated to all LOAs.
- 4. Examination by qualified individuals at the SEA or LOA level of each COE to verify that the child is eligible.

MINIMUM COMPONENTS OF ID&R QUALITY CONTROL (CONTINUED)

- 5. A process for the SEA to validate that eligibility determinations were properly made, including conducting prospective reinterviewing.
- 6. Documentation that supports the SEA's implementation of its quality-control system and of a record of actions taken to improve the system where periodic reviews and evaluations indicate a need to do so.
- 7. A process for implementing corrective action if the SEA finds COEs that do not sufficiently document MEP eligibility, or in response to internal State audit findings and recommendations, or monitoring or audit findings of the Secretary.

(34 § C.F.R. 200.89(d))

FLEXIBILITIES DURING THE COVID-19 PANDEMIC

- Recruitment interviews by phone, video conferencing, and other electronic methods
- May proceed without Interviewee signature on the Certificate of Eligibility (COE)
 - We recommend adding an explanatory note to the Comments section of the COE. If MEP staff are able to contact the interviewee in-person after normal activities resume, we recommend that the individual's signature be added to the COE and the Comments section be updated.
 - This limited exception <u>only applies to the interviewee</u> <u>signature</u>. The recruiter/interviewer and SEA-designated reviewer must continue to sign and date the COE to certify the eligibility determination (electronic signatures are acceptable).
- Re-interviews by phone, video conferencing, and other electronic methods

EFFECTIVE ID&R
DURING THE COVID-19
PANDEMIC:

A DISCUSSION WITH ID&R PRACTITIONERS

WHAT RECRUITMENT LOOKS LIKE DURING THE PANDEMIC

- Phase 1 Virtual Recruitment
 - Over the phone interviews of families, employers, crew chiefs, etc.
 - Completing residency verification lists; reviewing end of eligibility (EOE)
 - Contacting formerly eligible families (past 36 months)
 - Developing farm lists & H2A/H2B lists
 - o Check on social-emotional well-being of families, staff
- Phase 2 Drop-off and Field Recruitment with Social Distancing
 - Contactless COE completion (no signatures)
 - Wear mask, Watch your distance, Wash your hands (The 3 Ws)
 - Drop-off materials instructional, COVID-19 awareness, support services
 - Referring to other agencies
- Phase 3 Field Recruitment with Signatures Return to Normal

ID&R STAFF TRAINING

- Protocol for completing COEs during pandemic
- Phase 1 Virtual Recruitment
 - o Increased virtual meetings with recruitment staff
 - o Strategies for finding children, following up on lists
 - Professional development on use of technology (Whatsapp, Zoom, etc.); Google maps, networking with other providers and community agencies
- Phase 2 Drop-off and Field Recruitment with Social Distancing
 - Using Personal Protective Equipment (PPE)
 - Soap and water, masks, gloves, hand sanitizer, shields
 - Interviewing Process under COVID-19
 - Watch your distance (6 feet or more), limit duration of interview (10-15 minutes), no indoor interviews

EXAMPLE: CHARACTERISTICS OF AN EFFECTIVE MIGRANT EDUCATION PROGRAM RECRUITER

Good Communicator	Courageous	Proactive	Creative
Team Player	Sympathetic	Sensible	Friendly
Flexible	Persistent	Organized	Diligent
Honest	Independent	Reliable	Patient
Quick Thinker	Cooperative	Problem Solver	Enthusiastic
Outgoing	Trustworthy	Convincing	Thorough
Genuine	Funny	Nosy	Approachable

PROTECTING ID&R STAFF

- Health screenings
- Tips for securing necessary masks and other PPE
- Contact tracing
- Attention to staff mental health

EXAMPLE: DAILY SCREENING CHECKLIST

Do you currently have a fever?			
□ No □ Yes			
Have you had any known close contact with a person confirmed or suspected to have COVID-19 in the past 14 days?			
□ No □ Yes			
Do you currently have any of the following symptoms which may be related to COVID-19? Complete list of symptoms			
Cough (new or worsening) Shortness of breath (new or worsening) Troubled breathing (new or worsening) Chills Muscle pains (new or worsening) Headache (new or worsening) Sore throat (new or worsening) New loss of taste or smell			
Have you tested positive for COVID-19 through a diagnostic test in the past 14 days?			
□ No □ Yes			
Have you traveled to any of the states listed on the New York State restricted list within the last 14 days or been exposed to someone who			
traveled to a restricted state within the last 14 days? <u>List of restricted states</u>			
□ No □ Yes			

OVERSIGHT OF ID&R STAFF

- Provide ongoing calls, meetings and professional development events (either face-to-face or virtual, depending local conditions)
- Check on staff's social and emotional well-being
- Monitor completion of COEs
 - o Are proper COVID-19 protocols used?
- Allow for discussion amongst staff about issues in the field
- Engage in networking opportunities with national, regional and local providers

RE-INTERVIEWS DURING COVID-19

- Phone-based interviews
- Use one re-interviewer; limit number of people involved
- Organization is key person needs to keep track of calls, attempts made, etc.
- How to deal with families' apprehension to answer the phone?
 - "Digital business cards" with photo, local phone number, migrant logo
 - Text message or use WhatsApp to contact families before you call them
 - Over-sample a higher number of non-responses than in face to face re-interviews
- Make a decision at the start on how to handle families no longer in the state
- Make a plan to accommodate multiple languages

THANK YOU FOR YOUR PARTICIPATION

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