



# OKLAHOMA MIGRANT EDUCATION PROGRAM 2021 RE-INTERVIEW REPORT

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## INTRODUCTION

The U.S. Department of Education Office of Migrant Education (OME) requires state education agencies (SEAs) to implement quality control procedures to ensure the timely and proper identification of migratory children and youth. Since 2008, one of the procedures required by the OME to validate eligibility determinations is the annual re-interviewing of families, children, and youth currently deemed eligible by the SEAs. On November 22, 2019, final regulations for the MEP were published in the Federal Register. The key changes included:

- Clarifying that individuals conducting annual prospective re-interviews must be individuals who did not work on the initial eligibility determination being reviewed.
- Replacing the reference to “current-year” eligibility determinations with the term “current performance reporting period.” A performance reporting period, sometimes referred to as a child count year, is a more specific time frame: September 1 through August 31, and thus clarifies any ambiguity associated with the phrase “current-year.”
- Modifying the requirement that SEAs use independent re-interviewers for prospective re-interviews at least once every three years. Instead, the regulations require the use of independent re-interviewers at least once every three years until September 1, 2020. After September 1, 2020, SEAs are required to use independent re-interviewers for prospective re-interviews at least once during one of the first three full performance reporting periods (September 1 through August 31) following the effective date of a major statutory or regulatory change that impacts program eligibility (as determined by the Secretary), in order to test eligibility determinations made based on the changed eligibility criteria.

In February 2021, OME notified the Oklahoma State Department of Education (OSDE) that their request for a waiver on the regulation was granted and that they were required to conduct an independent re-interview that meets the following conditions for their 2020-2021 independent prospective re-interview (excerpted from the waiver letter):

- The State’s sample size must be at least 70 to 75 percent of Oklahoma’s sampling universe (i.e., the number of children determined to be eligible for the MEP since September 1, 2020). The State must adequately account for nonresponse to achieve the desired sample size.
- The State must use Self-Weighting Probability Proportional Size Sampling (PPS) to ensure children from each district are re-interviewed and the number of children selected from each district reflect the district’s proportion of migratory children in Oklahoma.
- The State must provide OME with a progress update (e.g., independent re-interviewer(s) selected, re-interview plan including timeline and milestones, sample size) no later than **May 31, 2021.**
- No later than six weeks after the completion of the 2020-2021 independent prospective re-interviews, the State must provide the Office of Migrant Education (OME) with a report including findings and corrective actions or improvements to address the

problems identified by the State (including the identification and removal of other ineligible children in the total population)— consistent with the requirements of 34 C.F.R. § 200.89(b)(2)(vii).

- The State must select independent re-interviewers who are trained to conduct personal interviews and to understand and apply program eligibility requirements (see 34 CFR § 200.89(b)(2)(i)(A)). The State should use culturally competent independent re-interviewers experienced with working with migratory families who speak the language, understand the work, and understand migration patterns.

This report describes the efforts of the Oklahoma Migrant Education Program (OMEP) and Arroyo Research Services (ARS) as a contractor to validate and corroborate the eligibility of migratory families and youth in the state. Based on the final regulations from OME referenced above, this document includes the re-interview results for Certificates of Eligibility (COEs) completed during the performance period of September 1, 2020 to June 15, 2021. The findings of this re-interview will be used by the OMEP to improve their identification and recruitment (ID&R) practices through implementation of enhanced strategies and procedures for ensuring proper eligibility determinations.

This report includes the following: the methodology used while conducting the interviews, resulting findings, and recommendations. Based on the findings, a response rate, discrepancy rate, and number of COE completion errors were determined and are included in this report.

Appendix A shows the OMEP funded districts. Recruitment in the state is conducted by staff in the eight funded districts and by a statewide recruiter who is responsible for recruitment in non-funded districts.

## METHODOLOGY

ARS implemented the following steps in order to conduct the re-interviews of migratory families in Oklahoma:

- Develop sampling plan
- Develop/modify re-interview form and protocol
- Identify and prepare independent re-interviewer
- Interview families
- Review re-interview forms to validate determinations using an independent review panel
- Provide due process to challenge review determinations
- Calculate response rate and discrepancy rate
- Report findings and recommendations

### **Develop Sampling Plan**

ARS reviewed the state's migrant-specific database in coordination with staff from the OMEP to ascertain the estimated number of migratory children residing in Oklahoma. Per the waiver letter, it was determined that the sample for this study would be selected from the universe of migratory children, ages 3-21, for whom a new COE had been completed during the performance period of September 1, 2020 to August 31, 2021.

The SEA determined the universe for the study by running a report to extract a list of all students (ages 3-21) newly recruited (COE sign date) in Oklahoma during the time period of September 1, 2020 to June 15, 2021 (June 15, 2021 was selected in order to be able to complete the re-interview by the deadline established by OME). As a result, the interviews were conducted in the period June 24 to July 1, 2021. There were a total of 37 COEs and 80 students in the sample universe. Table 1 below shows the number of students by district who met the re-interview criteria (ages 3-21, with a new COE completed during the 2020-2021 performance period).

**Table 1. Number Of Students By District Who Met The Re-Interview Criteria**

District	Number of Students
Altus	7
Commerce	3
Frederick	14
Guymon	18
Heavener	4
Miami	9
Tahlequah	5
Westville	2
Statewide Recruiter	18
TOTAL	80

Based on the waiver letter from OME, it was determined that the state's re-interview process needed to include 70-75% of the sampling universe, or between 56 to 60 students. To avoid sample replacement concerns, the OMEP and ARS determined that an attempt to interview all the students in the sample would be made.

The SEA transmitted a spreadsheet with the student data to ARS electronically in a password protected encrypted document. The data included demographic information (COE number, student ID, child's first and last name, the qualifying arrival date [QAD], district, phone number, date of birth, and parent/guardian names). OMEP securely transmitted the corresponding COEs for the sample universe.

### **Develop/Modify Re-interview Form and Protocol**

Due to COVID-19 limitations regarding travel and face-to-face contact with families and staff, a web-based re-interview form was developed to conduct the re-interview. The questions in the re-interview form complied with current OME regulations and requirements for interviewing migratory families. The target date is the QAD on the COE that was used to make an eligibility determination. The re-interviewer was instructed to complete the re-interview form with the information obtained from the interviewee and to use the target QAD as the baseline date for the re-interview. A copy of the external review questions is included in Appendix B.

### **Identify and Prepare the Independent Re-interviewers**

One ARS independent re-interviewer was used during the Oklahoma re-interview process. The re-interviewer has extensive experience conducting ID&R and quality control activities, and ARS made sure that the individual was independent from any COE completed within the state.

On May 6, 2021, the ARS project team met with the OMEP team via a Zoom conference call to discuss the re-interview protocol, the proposed timeline for conducting the re-interview, and the basic eligibility factors. The OMEP team also shared state-specific MEP activities including OK eligibility information.

The ARS ID&R Specialist developed a web-based re-interview form and shared it with the re-interviewer. The re-interviewer also received the necessary materials relevant to conducting the re-interviews. These materials included a spreadsheet provided by the OMEP team that included demographic information for the list of children in the sample. To maintain the highest level of integrity in the re-interview process, the identities of children selected in the sample were withheld from local OMEP staff/recruiters until the SEA meeting was concluded.

### **Interview Families**

Interviews were conducted during the period of June 24, 2021 to July 1, 2021. The re-interview process took place through phone interviews due to the COVID-19 pandemic which eliminated the option of face-to-face interviews. The re-interviewer was asked to make at least 10 attempts to contact individuals in the sample.

Local staff from the OMEP were used during the re-interview process to assist the out-of-state individual in scheduling appointments with the families. Local staff were instructed not to inform families about the purpose of the re-interview.

### **Review Re-interview Forms to Validate Determinations Using an Independent Review Panel**

To maintain integrity in the re-interview process, ARS enlisted a review panel comprised of three out-of-state independent ID&R experts, all of whom are current MEP experts who have previously participated in re-interview efforts. The role of the panel was to examine the web-based forms completed by the re-interviewer and compare them to the COEs. Based on their review, the panel was to indicate on a rating sheet if the sample was eligible, if additional information was needed, or if the sample was not eligible.

Reviewers compared COEs and, when necessary, reviewed individual child information. After all the forms were reviewed and the tally sheets completed, panelists submitted their findings to

ARS. The review panel initiated their efforts on July 12, 2021 and finished their initial determination review by July 26, 2021.

### **Provide Due Process to Challenge Review Panel Determinations**

Once the review process was completed, ARS provided the OMEP with a preliminary report containing the review panel’s initial determination findings, including a per student indication of eligibility status.

Copies of the completed re-interview forms that needed clarification were sent to the OMEP with information on the type of clarifying information required to assist the reviewers in making a proper determination.

After receiving the initial determinations, the OMEP had time to provide additional clarifying information as a basis to appeal the panel’s determinations. The OMEP submitted their final appeal documentation on August 24, 2021.

## **LIMITATIONS OF THE STUDY**

The study and results are affected by the following limitations:

1. The interviews conducted both during the original determination of eligibility and subsequent re-interview efforts depend on the information provided by the interviewee. Although they are well trained, recruiters still must rely on the information and statements provided by the families and youth at the time of the interview.
2. Results are limited to children and youth who were identified by the OMEP and their recruitment staff and were determined eligible at the time of the re-interview.
3. Due to COVID-19, re-interviews were conducted over the phone. Therefore, the re-interview is based solely on information collected during the phone re-interview as provided by the interviewee. The re-interviewer was unable to verify the identity of persons interviewed through the phone, limiting the veracity of the information obtained through the process.

## **RESULTS AND RECOMMENDATIONS**

### **Response Rate**

As shown in Table 2, analysis of the re-interview logs shows the following patterns of response and non-response.

**Table 2. Re-interview response rate (overall sample)**

	<b>Sample Size<sup>1</sup></b>	<b>Completed Re-Interviews</b>	<b>Attempted, Not Interviewed<sup>2</sup></b>	<b>Response Rate<sup>4</sup></b>
Sample Universe	80	72	8	90%

<sup>1</sup> *Sample Size* equals the number of children identified on the sampling list. For the OMEP re-interview, the sample size and the sample universe were the same – 80.

<sup>2</sup> *Attempted, Not Interviewed* includes the children/youth for whom attempts were made, but no contact was made due to non-response or a disconnected number. It does not include children/youth for whom a re-interview was completed.

<sup>4</sup> *Response Rate* is the result of Completed Re-interviews / (Completed Re-Interviews + Attempted Not Interviewed).

The overall response rate for the OK re-interview was 90%. A total of 80 interviews were attempted. A total of 72 interviews were completed.

In summary, of the 8 non-response samples, the re-interviewer was unable to establish contact with 7 in the sample after 10 attempts, while 1 had a number no longer in service (disconnected).

Table 3 below shows the number of re-interviews conducted by district and for the state.

**Table 3. Number of Re-interviews Conducted**

District	Number of Students in Sample	Number of Students Re-interviewed
Altus	7	7
Commerce	3	3
Frederick	14	14
Guymon	18	16
Heavener	4	4
Miami	9	3
Tahlequah	5	5
Westville	2	2
Statewide Recruiter	18	18
TOTAL	80	72

A total of 72 out of 80 students, or 90% of the sampling universe, were re-interviewed, meeting the requirement for sampling size from OME’s waiver letter. Since an attempt was made to re-interview all the children in the sampling universe, it was determined that there was no need to use a self-weighting probability proportional size sample method. All the children eligible for a re-interview for the 2020-2021 school year were included in the sample.

All 72 completed re-interviews were conducted over the phone due to COVID-19 restrictions at the time of the re-interview process. The local OMEP staff contacted families to schedule a re-interview but had no other involvement in the process. Local OMEP staff were instructed on the importance of maintaining confidentiality of data.

**Results – Initial Determinations**

ARS analyzed the data in terms of four major areas: response rate, eligibility error rate, COE completion error rate (not affecting eligibility), and additional information needed in order to make an eligibility determination. The response rate takes into account the number of attempts that were made compared to the total re-interviews actually completed. The eligibility error rate compares the number of eligible versus not eligible families identified. Finally, where indicated, the review panel requested additional information to ascertain the eligibility determination of migratory children.

The initial review panel determination resulted in the eligibility information reported below in Table 4.

**Table 4. Initial determinations by review panel for 72 re-interviews (prior to state or local challenge)**

	<b>Eligible</b>	<b>Eligible with COE Errors / Questions</b>	<b>Not eligible</b>
Students	50	20	2

The expert panel reviewed all 72 re-interview forms, compared these to the original COEs, and provided an initial determination for each sample that was re-interviewed. The panel initially determined 50 students as “eligible.” The panel determined that there were 20 students (all on 7 COEs) that were eligible but their COEs had errors and needed clarifying information. The panel also determined that two students on one COE were not eligible. The ARS team forwarded the initial determinations to the state and asked for clarifying information

**Need More Information and Not Eligible Initial Determinations**

As part of the re-interview process, the OMEP was given the opportunity to provide information or evidence to appeal the panel’s initial determinations. OMEP provided corrected COEs for the 20 students in the 7 COEs that were determined as eligible but needing corrections in the form. The SEA concurred with the initial “not eligible” determination of two re-interviews (#67 and #72) and decided not to appeal them. The table below summarizes the comments from the review panel regarding these COEs.

**Table 5. “Not Eligible” and “Eligible with COE Corrections”**

<b>Sample #</b>	<b>Clarification Needed and Appeal Information (if applicable)</b>	<b>Final Determination</b>
<b>60</b>	The re-Interview concluded that the family's move to Miami, OK was from Guatemala directly and they did not live in Georgia. The Qualifying Moves	Eligible with COE Corrections

Sample #	Clarification Needed and Appeal Information (if applicable)	Final Determination
	& Work Section of the COE should be revised to reflect the correct to and from locations.	
80,28	The Qualifying Activity on the COE does not match the qualifying activity that the re-interviewer obtained. The work described in the re-interview is temporary in nature but the qualifying work on the COE is listed as seasonal. Please either confirm the seasonality of the work being conducted or correct the COE to match the temporary statement and qualifying activity obtained in the re-interview.	Eligible with COE Corrections
72,67	The temporary statement on the COE indicates the worker would have been employed at "Seaboard" Foods for more than 12 months. With the information given, it appears the child(ren) are not eligible for the MEP.	Not Eligible
32,54	According to the re-interview, the work obtained in Oklahoma was for non-qualifying work. Section III, Question 4 of the COE must be changed to reflect the move on 7/4/19 from Ainsworth, IA to Baudette, MN where the worker engaged in qualifying work soon after the move.	Eligible with COE Corrections
68,71	According to the re-interview, the qualifying work is Feeding cows which will require a temporary statement. The re-interview did obtain a statement that indicated the work will last less than one year. The COE can use the Qualifying Work using corn but the move would have to reflect the May 2020 move from Frederick, OK to Hollis, OK.	Eligible with COE Corrections
76, 3, 10	Section III, Question 4 of the COE should be changed to reflect the move from Ciudad Hidalgo, MC, Mex to Monon, IN since that is the move soon after which the worker engaged in qualifying work. According to the re-interview, the worker did not engage in qualifying work in Culver, IN.	Eligible with COE Corrections
35, 39, 17	The Qualifying Activity code on the COE does not match the fish work described in the comments and re-interview.	Eligible with COE Corrections
49, 70, 69, 9, 13, 63, 23	The COE is missing two children. The re-interview and comments section state the worker moved to Minnesota to harvest corn but Section III, Question 4 of the COE states the qualifying work was completed in Altus, OK.	Eligible with COE Corrections

**Re-interview Outcomes – Final Determinations**

The OMEP provided appeals for all of the “Eligible with COE corrections” cases and agreed with the conclusion on the ineligible case. The OMEP appeal gave ARS sufficient documentation to make a final determination for all 72 cases that were re-interviewed in the random sample. Table 6 shows the final outcome as well as indicates the final discrepancy rate.

**Table 6. Review panel determination (initial and final) and Discrepancy rate**

	Eligible	Eligible with COE Errors / Questions	Not Eligible
Initial Review Panel Determination	50	20	2
Final Determination after Appeal Review	70	0	2
Discrepancy Rate			
Percent Ineligible (Not Eligible/Total Re-interviews)			2.8%

Based on the findings from the re-interview team and the results of the appeal process, the study has determined that a proper eligibility determination was made in 70 out of 72 cases, resulting in a 97.2% accuracy rate.

**Recommendations**

The independent re-interview brought to light that the OMEP staff view quality control with high regard. Nevertheless, a few observations were made by the re-interviewers and the review panel that informed quality control recommendations made to assist the OMEP in refining future ID&R and re-interview efforts, as indicated below.

- Provide training to recruiters regarding the Qualifying Moves & Work Section III of the COE. Many states create their own COE Instructions Manual based on the National COE Instructions. In particular, there were several COEs that had the from and to move locations mixed up between lines 1 and 4 of Section III.
- Provide recruiter training on the difference between seasonal and temporary qualifying work. At least two of the COEs indicated the work was seasonal when the re-interview found the work to be temporary thus requiring a temporary statement.
- Provide recruiter training on temporary qualifying work and what will constitute an appropriate temporary statement in the Comments section of the COE.
- Maintain a consistent protocol for documenting if the signature was not recorded on the COE because of the COVID-19 Pandemic. Some of the COEs didn't have comments to indicate this and other COEs did have a comment explaining why there was no signature.
- Maintain and continue to update the list of Qualifying Activity Codes. Some of the codes that were on the COEs were not on the list of codes. Two of the COEs had a qualifying activity code that was different from the work that was being completed.
- Maintain a standardized way to calculate Residency Dates. Most Residency Dates were consistent with the Qualifying Moves & Work Section of the COE but others did not match the information.

## SUMMARY

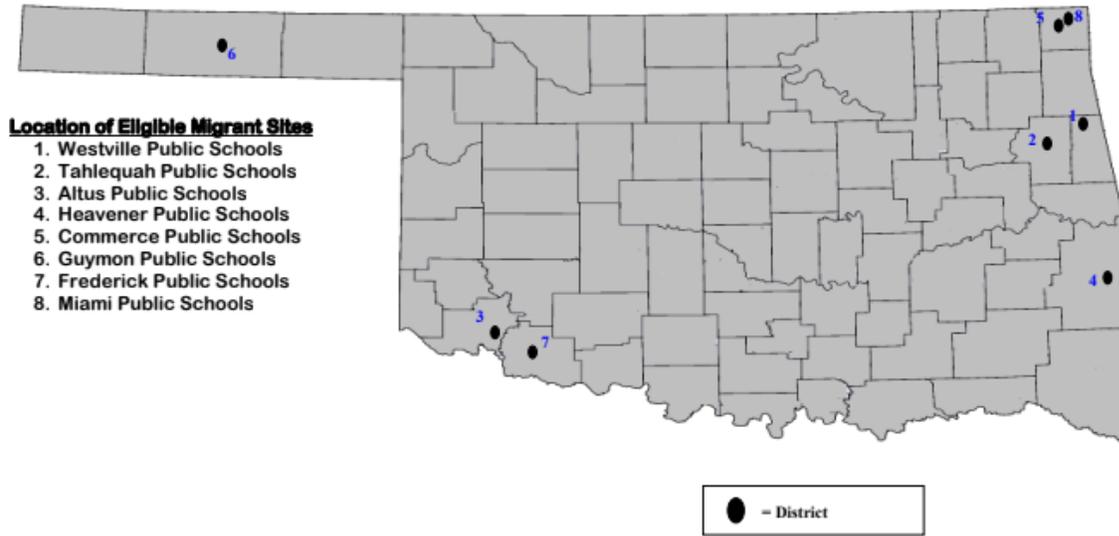
The re-interview activity for the OMEP was conducted during the period of June 24, 2021 to July 1, 2021. One independent re-interviewer was deployed to contact all the children and youth in the sample universe (80) for the 2020-2021 performance period in Oklahoma. Because of COVID, the re-interviews were all conducted over the phone and each re-interview was attempted at least 10 times. The re-interviewer was able to contact and re-interview 72 children and youth in the sample, resulting in a 90% response rate.

A review panel comprised of three out-of-state ID&R experts determined the accuracy of each original eligibility determination for which a re-interview was conducted. The panel's determinations were shared with the OMEP which, in turn, provided additional clarifying information to ARS. Following the appeal process, ARS determined that 70 of the 72 children who were the focus of the re-interview were eligible. The post-appeal accuracy rate was 97.2%.

Re-interviewers and ARS found the OMEP staff to be very helpful and truly concerned for the well-being of the migratory children and families in the state, particularly Migrant Program Specialist Erin Clapper and Jose Henriquez, State MEP Specialist, along with the local recruiters. The staff's support and knowledge of the migratory families, children, and youth in Oklahoma is highly commendable.

APPENDIX A: MAP OF REGIONS OF OKLAHOMA

State of Oklahoma Eligible Migrant Educational Agencies  
2020 – 2021



## APPENDIX B: 2019-2020 EXTERNAL RE-INTERVIEW QUESTIONS

Re-interviewer Email address

Re-interview Sample Number

Re-interviewer Name

Does the child/youth have a new address

Enter the new address (only if applicable)

Person Interviewed (First and Last Name)

Relationship to the child

1. When and where was the worker living before moving here? What type of work did he/she do? (*¿Cuándo y dónde vivió el trabajador antes de mudarse hacia acá? ¿Qué tipo de trabajo hizo?*)

MOVE A = Current move; MOVE B = Move before A (if occurred); MOVE C = Move before B (if occurred). Enter the "FROM" and "TO" location and reason for the move. If the ESTABLISHED WORKER DATE (EWD) is captured in Move A, do not complete B and C.

Enter Move A Date

Move A - Is this within 30 days of the Established Worker Date (Section III No. 4)?

Move A - FROM and TO Locations

Move A - Work (the reason for the move)

Enter Move B Date (ONLY if needed)

Move B - Is this within 30 days of the EWD?

Move B - FROM and TO Locations

Move B - Work (the reason for the move)

Enter Move C Date (ONLY if needed)

Move C - Is this within 30 days of the EWD?

Move C - FROM and TO Locations

Move C - Work (the reason for the move)

1a. If the EWD is not listed in Move A, B, or C, ask for an explanation.

2. When the worker moved on the EWD, what type of work did he/she do or actively seek? Must select Agricultural or Fishing AND Seasonal or Temporary OR EWD not listed. *¿Cuándo se mudó el trabajador en el (EWD), que tipo de trabajo hizo o buscó activamente?*

2a. When the employment first started, how long did the worker intend to work? OR If the employment ended, how long did the work last? Must ask if "temporary" is checked in #2.  
*Cuando empezó el trabajo, ¿cuánto tiempo intentó trabajar?*

3. Did the worker move due to economic necessity, from one residence to another, and across school district lines on the EWD? *¿El trabajador se mudó debido a necesidades económicas, de una residencia, y cruzando distritos escolares en el (EWD)?*

4. Did the child move due to economic necessity, from one residence to another, and across school district lines on the Target QAD? *¿El niño/niña se mudó debido a necesidades económicas, de una residencia a otra, y cruzando distritos escolares?*

5a. How did the child last move? *¿Se mudó el niño/la niña como, junto con, para unirse con o antes del trabajador?*

5b. Enter the date the child moved. (The date should be within 30 days of the child's move date that is in on the COE).

5c. Enter the "From" and "To" locations. *¿De dónde? ¿Hacia dónde?* (Trying to find the move that is listed in Section III, No. 1.)

6. List full name(s) and current age(s) of ONLY the child(ren) who made the move on the Target QAD. *¿Cuáles son los nombres y las edades actuales de SOLO los niños que hicieron la movida/mudanza en (Target QAD)?*

7a. Have any of the children who made this move graduated from high school or obtained an HSED (GED) in the U.S.? *¿Se han graduado de la escuela superior o han obtenido un diploma de equivalencia (GED) en EE.UU. algunos de los niños que hicieron la mudada?*

7b. If answered yes, enter the month and year the child graduated or received an HSED (GED). If yes, when (MM/YY). *¿Si? ¿Cuándo?*

8. Use this space to provide explanations if the response to #3 and/or #4 is "no", if the date in #5 does not match the Target QAD, if any child listed in #6 is not listed on the COE, or maybe used for additional notes.

Location (city, state) of the person interviewed

Example: Guymon, OK

Phone number of the person interviewed

Example: 123-456-7890

Read this statement to the person you are interviewing - To the best of my knowledge, the information on this form is correct.

*De acuerdo a mi conocimiento y entendimiento, la información estipulada en éste documento es verdadera.*

**APPENDIX C: 2.4.3 CHILD COUNT CALCULATION AND VALIDATION PROCEDURES**

**2.4.3.2 QUALITY CONTROL PROCESSES**

In the space below, describe the results of any re-interview processes used by the SEA during the performance period to test the accuracy of the State’s MEP eligibility determinations.

<b>Results</b>	<b>#</b>
The number of eligibility determinations sampled.	80
The number of eligibility determinations sampled for which a re-interview was completed.	72
The number of eligibility determinations sampled for which a re-interview was completed and the child was found eligible.	70

<b>Procedures</b>	
What was the most recent year that the MEP conducted independent prospective re-interviews (i.e., interviewers were neither SEA or LEA staff members responsible for administering or operating the MEP, nor any other persons who worked on the initial eligibility determinations being tested)? If independent prospective re-interviews were not administered in any of the three performance periods, please provide an explanation in the “Comment” row at the end of this table.	<input checked="" type="checkbox"/> SY 2020-2021 <input type="checkbox"/> SY 2019-2020 <input type="checkbox"/> SY 2018-2019
Comment: Not applicable	

**FAQ on independent prospective re-interviews:**

- a. *What are independent prospective re-interviews?* Independent prospective re-interviews allow confirmation of your State’s eligibility determinations and the accuracy of the numbers of migratory children in your State reports. Independent prospective interviews should be conducted at least once every three years by an independent interviewer, performed on the current year’s identified migratory children.

<b>Obtaining Data from Families</b>	<b>Yes</b>	<b>No</b>
Check the applicable box to indicate how the re-interviews were conducted: <input type="checkbox"/> Face-to-face re-interviews <input checked="" type="checkbox"/> Phone Interviews <input type="checkbox"/> Both		

Was there a protocol for verifying all information used in making the original eligibility determination?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Were re-interviewers independent from the original interviewers?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

If you did conduct independent re-interviews in this reporting period, describe how you ensured that the process was independent. Only enter a response if your State completed independent re-interviews in SY2020-2021.

The response is limited to 8,000 characters.

The Oklahoma Migrant Education Program (OMEPE) contracted Arroyo Research Services (ARS) to conduct the external re-interview for the 2020-2021 performance period. One ARS external re-interviewer contacted families via phone calls to complete the required re-interviews. The re-interview process took place through phone interviews due to the COVID-19 pandemic which eliminated the option of face-to-face interviews. The re-interviewer followed the recommendation by the Reinterviewing Technical Assistance Guide to make at least 10 attempts when conducting re-interviews over the phone.

The information collected through the phone call was recorded and shared with an independent three-person panel. All panel team members were ARS ID&R expert consultants who had no relationship with the OMEPE.

The OMEPE Specialist identified all the eligible students, ages 3-21, who had a new COE completed during the 2020-2021 performance period. As a result, 80 eligible students were identified as meeting the criteria and were determined as “sample universe” representing all students recruited during the 2020-2021 performance period. The OMEPE Specialist shared the data with ARS through an encrypted message. The determination was made by the ARS Project Lead, in conjunction with OSDE, to re-interview the entire universe of students.

In the space below, refer to the results of **any** re-interview processes used by the SEA, and if any of the migratory children were found ineligible, describe those corrective actions or improvements that will be made by the SEA to improve the accuracy of its MEP eligibility determinations.

The response is limited to 8,000 characters.

ARS, an independent company with migrant program expertise, was contracted to conduct Oklahoma’s 2020-2021 re-interview. A total of 72 students were re-interviewed by an individual independent of the OMEPE. A three-person panel with expertise in ID&R reviewed the re-interview information for all 72 eligibility determinations. The panel determined that 70 out of the 72 interviews were accurate. This resulted in a 97.2% accuracy rate. As a result of the re-interview, the OMEPE removed **the non-eligible** students from their database and their child count for the 2020-2021 performance period.

The OMEP implemented the following corrective actions regarding the non-eligible COEs:

- Stop serving the non-eligible child(ren) currently on the COE.
- Send communication to the family informing them that their child(ren) is(are) no longer eligible for the MEP.
- Ensure that the local databases have updated the migratory status of the child(ren) identified as not eligible. Also remove other program eligibility indicators for the students affected
- Do not include the child(ren) in the state’s migratory child count for the 2020-2021 performance period.

Also, as a result of the re-interview, a number of errors were identified in the completion of COEs. The OMEP will address these errors through their professional development efforts.

- Provide training to recruiters regarding the Qualifying Moves & Work Section III of the COE. Many states create their own COE Instruction Manual based on the National COE Instructions. In particular, there were several COEs that had the from and to move locations mixed up between lines 1 and 4 of Section III.
- Provide recruiter training on the difference between seasonal and temporary qualifying work. At least two of the COEs indicated the work was seasonal when the re-interview found the work to be temporary thus requiring a temporary statement.
- Provide recruiter training on temporary qualifying work and what will constitute and appropriate temporary statement in the Comments section of the COE.
- Maintain a consistent protocol for documenting if the signature was not recorded on the COE because of the COVID-19 Pandemic. Some of the COEs didn’t have comments to indicate this and other COEs did have a comment explaining why there was no signature.
- Maintain and continue to update the list of Qualifying Activity Codes. Some of the codes that were on the COEs were not on the list of codes. Two of the COEs had a qualifying activity code that was different from the work that was being completed.
- Maintain a standardized way to calculate Residency Dates. Most Residency Dates were consistent with the Qualifying Moves & Work section of the COE but others did not match the information.

In the space below, please respond to the following question:

Does the state collect all the required data elements and data sections on the National Certificate of Eligibility (COE)?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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