



JOY HOFMEISTER

STATE SUPERINTENDENT *of* PUBLIC INSTRUCTION
OKLAHOMA STATE DEPARTMENT *of* EDUCATION

July 21, 2020

Dear Assistant Secretary Brogan:

I am writing on behalf of the Oklahoma State Department of Education to request a waiver of the requirement to conduct retrospective re-interview using independent re-interviewers at least once every three years until September 1, 2020. The waiver would allow a statewide retrospective re-interviewing process to verify and establish a valid and reliable defect rate that measure the quality of Oklahoma's eligibility determinations to be delayed for one year (performance period of 2020-2021, by September 1, 2021).

Oklahoma seeks a waiver for the retrospective re-interviewing provision requirement under 34 C.F.R. § 200.89(b)(2)(i)(A), *Re-interviewing; Eligibility Documentation; and Quality Control*.

The waiver request will have a positive impact on the Title I, Part C, Education of Migratory Children program in Oklahoma to attain student academic performance goals for serving migrant students.

- Oklahoma will validate reliable defect rates that measure the quality of Oklahoma's eligibility determinations for an entire child count year;
- Oklahoma will validate the total number of migrant students eligible for services in the Local Educational Agencies (LEAs) receiving migrant funds;
- Oklahoma will review and evaluate migrant student data, from state assessments, LEA instructional services, LEA programs for early childhood and out of school youth (OSY), fidelity of strategy implementation (FSI) and the strategies that serve as the anchor for developing LEA migrant profiles for technical assistance;
- Oklahoma will provide support to migrant funded districts as established in the State's Service Delivery Plan (SDP) and the Measurable Program Outcomes (MPO) in the following areas: reading, mathematics, school readiness, high school graduation and services to OSY, and professional learning.

The waiver request will provide an independent review and perspective to the methodology for the identification and recruitment (ID&R) program in Oklahoma.

- Oklahoma will utilize professional and trained personnel with specific qualifications and experience for independent re-interviews;
- Oklahoma will monitor the progress of the independent re-interviewers based upon an established timeline, action plan, weekly communications, monthly written reports, and guidelines set forth by the USDE Migrant education program guidance and best practices. <https://results.ed.gov/curriculum>;
- Oklahoma will analyze the ID&R program as a result of the independent re-interviews and implement additional strategies for improvement.

Oklahoma hereby assures that, if it is granted the requested waiver, the LEAs serving migrant student populations will meet the following conditions:

- LEAs will continue to offer instructional services and other important services to provide opportunities for the migrant student population to succeed in meeting the State academic assessment which will be monitored by OSDE migrant staff;
- LEAs will strengthen the migrant program by conducting a Comprehensive Needs Assessment (CNA), Implementing a Service Delivery Plan (SDP), and Evaluating Measurable Program Outcomes (MPOs) which will be monitored by OSDE migrant staff;
- LEAs will submit Fidelity of Strategy Implementation (FSI) reports which will be monitored by OSDE migrant staff.

Oklahoma will ensure compliance to the requirement of C.F.R. § 200.89(b)(2) by providing professional guidance to LEAs with the purpose of strengthening the ID&R program to meet the needs of migratory students.

Prior to submitting this waiver request, Oklahoma provided all LEAs in the State with notice and a reasonable opportunity to comment on this request. Oklahoma provided such notice by sending an email to all school districts in the EngageOK newsletter on July 21, 2020 (see Attachment A). In addition, Oklahoma has provided notice and information regarding this waiver request to the public by posting information regarding the waiver request on OSDE's website (see Attachment B). A compilation of all comments that Oklahoma received from LEAs and the public in response to this notice is also attached hereto. (see Attachment C).

Please feel free to contact Dr. Gloria Bayouth, Executive Director, Office of Federal Programs at 405-522-3249 or Gloria.Bayouth@sde.ok.gov or Erin Clapper at 405-521-2846 or Erin.Clapper@sde.ok.gov if you have any questions regarding the waiver request.

Thank you for your consideration.

Sincerely,



Joy Hofmeister
Oklahoma, State Superintendent of Public Instruction

Attachments:

Attachment A: EngageOK Notice

Attachment B: OSDE Web site Notice

Attachment C: Public Comment Evidence