



Tennessee Migrant Education Program

Identification and Recruitment Plan and Manual

Funded by the Tennessee Department of Education
Operated by Conexión Americas

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Introduction

The Tennessee Migrant Education Program (TN MEP) is a federally-funded program authorized under Title I, Part C of the Elementary and Secondary Education Act (ESEA) with the purpose of addressing the unique educational needs of migratory children so that they have full and appropriate opportunities to meet the same academic standards as all other children. The program is responsible for the identification and recruitment of migratory students in the state (including preschool, in-school and out-of-school youth) and for providing supplemental instructional and support services to help students succeed in school and graduate from high school. In Tennessee, the Tennessee Department of Education (TDOE) uses an outside contractor to manage the state Migrant Education Program. Conexión Américas, a nonprofit organization, has held the contract since 2016, and carries out the daily work of the MEP program across the state. Founded in 2002, Conexión Américas is a nonprofit organization based in Nashville, Tennessee with the mission to build a welcoming community and create opportunities where Latino families can belong, contribute, and succeed.

The Tennessee *Identification and Recruitment Plan and Manual*¹ defines the Tennessee Migrant Education Program's Identification and Recruitment (ID&R) policies and practices, and equips Community Outreach Liaisons (C.O.L.s)² with the necessary knowledge and useful strategies to help them successfully identify and recruit students for MEP. The *Plan and Manual* details the roles and responsibilities of Community Outreach Liaisons, agricultural trends across the state, basic interview strategies, helpful resources for recruiting, and more.

What is the Migrant Education Program?

In 1966, the U.S. Congress amended Title I of the ESEA to include a new section: Part C - Education of Migratory Children. Through this Amendment, Congress authorized for the first time a program that provided states with federal financial assistance to help improve educational opportunities and academic success for the children of migratory agricultural workers. This program was called the Migrant Education Program, or MEP.

The ESEA, as amended by the 2015 Every Student Succeeds Act (ESSA), states that the purpose of the MEP is:

1. to assist states in supporting high-quality and comprehensive educational programs and services during the school year and, as applicable, during summer or intersession periods, that address the unique educational needs of migratory children;

¹ The *ID&R Plan and Manual* responds to the need identified under section 1304(C)(7) of the statute as well as A4. of the *Non-Regulatory Guidance* (p. 37), to “develop procedures to effectively identify and recruit all eligible migrant children in the State, generally through a statewide recruitment plan.”

² In Tennessee “recruiters” have the job title of Community Outreach Liaisons (C.O.L.s)

2. to ensure that migratory children who move among the states are not penalized in any manner by disparities among the states in curriculum, graduation requirements, challenging state academic standards;
3. to ensure that migratory children receive full and appropriate opportunities to meet the same challenging state academic standards that all children are expected to meet;
4. to help migratory children overcome educational disruption, cultural and language barriers, social isolation, various health-related problems, and other factors that inhibit the ability of such children to succeed in school;
5. to help migratory children benefit from state and local systemic reforms (Section 1301 of the ESEA, as amended).

The principal operational goal of the MEP is to ensure that all migratory students meet challenging academic standards so that they graduate with a high school diploma or receive a High School Equivalency Diploma (HSED) that prepares them for responsible citizenship, further learning, and productive employment.

Source: OME *National Identification and Recruitment Manual*, p. 4

For more information on the Migrant Education Program, watch the following videos:

Education for Migrant Students by Univision: <https://www.youtube.com/watch?v=5fPqDb6R1pE>
The Struggles of Migrant Students by Fusion: <https://www.youtube.com/watch?v=Bpi1kukUeaM>

Migratory Child Eligibility

The TN MEP's guidelines for who qualifies as a migratory child and can receive services from the MEP is aligned with federal guidelines and regulations; specifically, sections 1115(c)(1)(A) (incorporated into the MEP by sections 1304(c)(2), 1115(b), and 1309(3) of the ESEA, and 34 C.F.R. § 200.103(a)), which define a child as a 'migratory child' if the following conditions are met:

1. The child is not older than 21 years of age; and
 - a. The child is entitled to a free public education (through grade 12) under State law, or
 - b. The child is not yet at a grade level at which the LEA provides a free public education, and
2. The child made a qualifying move in the preceding 36 months as a migratory agricultural worker or a migratory fisher, or did so with, or to join a parent/guardian or spouse who is a migratory agricultural worker or a migratory fisher; and
3. With regard to the qualifying move identified above, the child moved due to economic necessity from one residence to another residence, and -

- a. From one school district to another; or
- b. In a State that is comprised of a single school district, has moved from one administrative area to another within such district; or
- c. Resides in a school district of more than 15,000 square miles and migrates a distance of 20 miles or more to a temporary residence.

Source: MEP *Non-Regulatory Guidance* Chapter II: Child Eligibility p. 12

Tennessee ID&R Personnel and Organizational Structure

As a Local Operating Agency (LOA), Conexión Américas has adopted a regional model in its implementation of the Migrant Education Program. Tennessee is divided into 4 distinct geographic regions based on student density.

Each region is staffed by Community Outreach Liaisons (C.O.L.s) who are responsible for the proper identification and recruitment of eligible students in the designated counties. Community Outreach Liaisons are tasked with being knowledgeable about local farms and agriculture in their area, visiting popular housing locations for migrant farmworkers, and following up on referrals given by Education Advisors, community partners, and schools. Each C.O.L. reports to the Statewide Identification and Recruitment Manager overseeing ID&R strategies and planning across the state.

Each region has a team of Education Advisors that provide direct supplemental services to qualified students. Each region's team of Education Advisors is led by the Regional Service Manager who provides support to the Education Advisors in carrying out Tennessee's Service Delivery Plan in their region, and coordinates with the ID&R team to ensure that knowledge about new students is shared in a timely fashion.

Besides the regional teams, the TN MEP has a Home Office Team based out of the Conexión Américas' Casa Azafrán in Nashville, Tennessee. The Home Office Team is led by the Associate Director of MEP who coordinates and oversees TN MEP operations. The Home Office Team includes the Data and Compliance Coordinator, the Migrant Program Coordinator, and Curriculum Development Manager. The Data and Compliance Coordinator reviews and analyzes student data, monitors program compliance and accuracy based on federal regulations, leads interstate exchange efforts through MSIX and works closely with the Statewide Identification and Recruitment Manager to verify new student eligibility. The Program Coordinator provides critical administrative and technical support to the Migrant Education Program in Tennessee in the areas of administration, budgets and reporting, event planning, and communications. The Curriculum Design Manager compiles, creates, and edits curricula for the service team to use with students, as well as offering trainings on best practices in teaching and designing and implementing assessments.

As a Local Operating Agency (LOA), the TN MEP is overseen and accountable to the Tennessee Department of Education.

Identification & Recruitment Measurable Objectives

What are ID&R Measurable Objectives?

Section 1306(a)(1) of the statute requires the SEA and its local operating agencies to include in their state ID&R plans Measurable Program Outcomes that help the state achieve its performance targets. The ID&R Measurable Program Outcomes (MPOs) are the internally crafted data points that the TN MEP uses to annually monitor and evaluate its identification and recruitment efforts.

Objective 1

The TN MEP will design and implement a thorough ID&R orientation training for newly-hired ID&R staff.

Objective 2

The TN MEP will design as well as provide comprehensive, updated, and interactive training to all Community Outreach Liaisons at least annually, which will include a minimum of four professional development opportunities for the ID&R team to expand their knowledge of ID&R strategies, rules of eligibility, identifying students for the McKinney-Vento Program, services offered by Tennessee MEP, and more.

Objective 3

The ID&R team will provide Migrant Liaisons and LEAs across the state at least one annual professional development opportunity in the areas of eligibility requirements for MEP, the importance of the Occupational Surveys, and more.

Objective 4

All Tennessee ID&R staff will score 90% or higher on the Identification and Recruitment Consortium's C.O.L. Assessment.

Objective 5

The integrity of the migrant child roster will be measured through a quality control and Internal re-interview process with an annual discrepancy rate within a 98% confidence level.

Objective 6

The Statewide ID&R Manager will formulate and share with the TN MEP team tri-annual strategic plans for identifying and recruiting students across the state.

Chapter 2 - The Community Outreach Liaison

What is Identification and Recruitment?

Identification means actively looking for and finding migratory children and youth.

Recruitment means making contact with the family or youth and obtaining the necessary information to document the student's eligibility and enroll them into the TN MEP.

The ID&R of migratory children is essential because the State Education Agency must create a record of eligibility for each migratory child before they can receive any of the TN MEP's educational or supportive services. The longer it takes a state to find a migratory child, the more time passes before the child receives the services they need to succeed. Furthermore, the children who are most in need of MEP services are often the most difficult to find.

Some of the challenges faced in the timely and effective identification and recruitment of migratory children are the following:

- Not all temporary or seasonal workers are eligible for the TN MEP because the worker must have moved due to economic necessity from one residence to another and from one school district to another and have (1) engaged in new qualifying work soon after the move, or (2) if the worker did not engage in new qualifying work soon after the move, actively sought to engage in such employment and had a history of moves for qualifying work. The eligibility requirements for the TN MEP require strong analytical and skilled training to properly evaluate eligibility.
- Migratory families are inclined to be self-sufficient and are not accustomed to seeking help outside of their own circle of family and friends.
- Children of migratory workers are often "invisible," quietly coming and going, and not attracting much attention in a new community. If these children are not actively recruited, many would not be in school (they may accompany their parents to work or be left alone at home) or receive services from the MEP.
- Finding and recruiting many out of school youth (OSY) who travel without their families or in groups of OSY is especially challenging. The traditional in-school recruitment model is not feasible because this population has no contact with the school district. Recruitment of OSY is most successful when it occurs at work sites, in the field, and at businesses where these youth work, as well as in housing where they live.
- Migratory families often do not speak or read English or are English Learners (ELs), and some are not literate in their native language.
- Frequently, there are significant cultural barriers and misunderstandings between the migratory family and the community in which they reside.

- The places where migratory families work and reside are often located in remote areas, and employers may be uncomfortable if their employees have outside visitors during the workday. Employers may also discourage outside visitors because of concerns about liability, productivity, or the legality of their workers.
- There is considerable turnover in migratory agricultural and fishing work. The work is often difficult, dangerous, and, under the best circumstances, results in only modest wages. Living conditions in farmworker camps and other temporary, poorly maintained housing can be hard on all of the family members. Yet, while many migratory workers move into easier and more stable employment, others remain in or re-enter the migratory labor pool because they view temporary or seasonal work in agriculture or fishing as their only option in the workforce.
- The MEP may not be able to serve all migratory children; the children may not currently need supplemental academic support, or they may not be deemed a priority for service. Therefore, some families may not see an immediate benefit to their child being identified and may forgo the process.

For these and other reasons, the TN MEP needs to employ trained staff to identify and recruit migratory children. In Tennessee, these staff members are called Community Outreach Liaisons (C.O.L.s), and they receive extensive training in a basic set of procedures on how to find and recruit migratory children for the TN MEP.

Source: *OME National Identification and Recruitment Manual*, p. 6

Duties and Responsibilities of the Community Outreach Liaison in Tennessee

The primary responsibility of the C.O.L. is to identify, recruit, and enroll all eligible migrant students into the MEP.

C.O.L.s must be fluent in English and Spanish or another language commonly used by the migrant population in the state. C.O.L.s must also be highly organized and must possess a thorough understanding of the region in which they will work. Nationally, the position of Community Outreach Liaison is better known as 'Recruiter' and it will be commonly referred to as such in National Office of Migrant Education trainings and documentation. The TN MEP chooses to call the position Community Outreach Liaison instead of 'Recruiter' in order to highlight the work C.O.L.s do to build bridges between potential students and the communities in which they live.

Key Duties and Responsibilities:

- Recruit eligible migratory students the program including out-of-school youth and preschool age children.
- Connect with local school administrators, businesses, and other organizations in the community to identify and recruit eligible students.

- Follow up with referrals of potential participants from local school districts and community organizations.
- Help recruit potential participants by providing information to them about the various benefits offered to enrolled children and families.
- Aid local service providers in verifying student enrollment and contact information.
- Complete Certificates of Eligibility for each student and conduct follow up with migrant families.
- Enter appropriate data and reports in a timely manner.
- Maintain appropriate records of recruitment and other activities.
- Plan and conduct outreach in assigned counties.
- Research agricultural trends in the designated counties.
- Provide supportive services to migrant youth and families and refer migrant families and students to appropriate, health, social or legal services.
- Provide educational services to Out of School Youth (OSY) as identified in the State Service Deliver Plan.
- Travel to different regions, and locations, including homes, farms, packing houses, schools, and other locations throughout the community to identify and recruit students.

General Organization Support Duties:

- Speak or make presentations on behalf of Conexión Américas or the TN MEP at events and conferences.
- Communicate in a positive and effective manner Conexión Américas and the TN MEP's mission and programs.

Qualifications (Education and Experience):

- Excellent written and oral communication in English and Spanish required
- Experience with social service delivery, particularly in rural settings.
- Ability to work in diverse settings (schools, homes, farms, community centers).
- Experience managing and utilizing data and information to solve problems and make decisions.
- Ability to use technology to communicate internally and externally, prepare reports, record information, and determine program improvement.
- Must have reliable transportation and possess a valid TN Driver's License and automobile insurance.
- Must be able to attend regional and state in-service trainings and meetings.
- Must pass background check and language assessment.
- Ability to work flexible hours, including afternoons, evenings, and weekends, required.
- Ability to work independently, manage multiple tasks and work in a fast-paced environment with deadlines and strict timelines, required.
- Excellent computer skills, including MS Office, Google Suite, and database management, required.
- Demonstrated appreciation for Latino culture and families, as well as other immigrant and refugee groups, required.

- Experience and knowledge of nonprofit organizations' operations, preferred.

Community Outreach Liaison Language Self Assessment

Language and being able to communicate is critical for all Community Outreach Liaisons. It is not only necessary for potential C.O.L.s to have experience in Spanish or other languages common to the migrant community in Tennessee; they must be fully fluent in order to communicate with migrant students and their families, understand their stories, and process the complexities of eligibility for the TN MEP in a foreign language. This is taken into account in the hiring process. C.O.L's will also be given a language self-assessment upon joining the team.

Characteristics of a Great Community Outreach Liaison

Great [Community Outreach Liaisons] are made, not born. If a [C.O.L.] doesn't feel ready to do the job, the [C.O.L.] should work with a supervisor to identify and develop the skills needed to be successful.

Experienced ID&R coordinators say that, as a general rule, it takes about three years for a C.O.L. to fully learn the job. The specific skills required to be a great C.O.L. are developed over time. If the C.O.L. does not initially possess these skills, the supervisor can help the C.O.L. cultivate them. When ID&R coordinators and MEP administrators are asked about "a great Community Outreach Liaison" or "their best Community Outreach Liaison," certain characteristics emerge.

A great C.O.L. is able to:

- Make correct eligibility decisions,
- Document child eligibility accurately and clearly,
- Manage time wisely,
- Work independently,
- Remain flexible and adapt to a constantly changing environment,
- Relate well to others and gain their trust,
- Create positive relationships with agricultural employers,
- Use effective interviewing (i.e., questioning) skills,
- Maintain appropriate relationship boundaries,
- Follow confidentiality laws,
- Demonstrate personal integrity, and
- Speak local migratory families' native languages and exhibit cultural sensitivity.

Few C.O.L.s come to the job with all of the skills that make a great C.O.L. Effort, enthusiasm, and a willingness to learn are necessary. Although it may take a number of years to be considered 'great,' it is within the grasp of every C.O.L. to achieve excellence.

Source: *OME National Identification and Recruitment Manual*, p. 12

Knowledge and Skills of Successful Community Outreach Liaisons

Know About the Local MEP

The Community Outreach Liaison must know more than just recruitment. As stated previously, the C.O.L. is often the first point of contact of the TN MEP to families, OSY, schools, and the local community. A C.O.L. is also a champion for the TN MEP. A migratory family will often ask the C.O.L. questions about MEP services that the program offers, such as: does the TN MEP offer a preschool program; is there a summer school; are minors still eligible for the TN MEP if they have dropped out of school; and, what programs are available to help my son or daughter graduate? The C.O.L. must learn about the TN MEP and other school and community programs that migratory children and families are eligible to receive.

Develop A Recruitment Network

A recruitment network is a system of contacts, including individuals, agencies, and other institutions, that provide information on how to identify and locate potentially eligible children. Establishing a recruitment network and developing a strong working relationship with each member of that network is an important way of finding migratory children who may be eligible for MEP services. When done properly, a recruitment network can serve as the eyes and ears of the C.O.L. Key sources of information include employers, schools, community-based agencies, commercial establishments, and others.

Determine Work Priorities

The C.O.L. often has many roles. If the C.O.L. is expected to recruit and do other work for the TN MEP, the C.O.L. should determine the work the supervisor considers the highest priority and allocate time accordingly. For example, the C.O.L., with guidance from the supervisor, may need to decide which of the following activities would be most productive: attending a job fair to recruit, staying in the school's main office to meet new families that may be eligible for the TN MEP, or knocking on doors to canvas for new families. In order to prioritize, the C.O.L. will need to assess which of these activities provide the greatest benefit to the MEP.

Ask Questions

There are many people who work in the TN MEP who are willing to help the C.O.L. do the job correctly. If the C.O.L. has a question or does not understand how something should be done, the C.O.L. should ask someone who is knowledgeable and record the answer in writing. In this way, the C.O.L. will become increasingly knowledgeable over time.

Make Ethical Decisions

The C.O.L. will meet families and youth who have great needs. The C.O.L. may believe that those children need and deserve help, even if they do not qualify for the TN MEP. Each C.O.L. brings a set of personal

beliefs and biases to the job; the C.O.L. will need to put these personal feelings aside in order to make objective decisions based on the MEP eligibility criteria.

Maintain Appropriate Relationship Boundaries

While the needs of many migratory families are vast, it is important for a C.O.L. not to make promises to a family that cannot be kept. All services provided must be in line with federal guidelines around the provision of what constitutes a supplemental service. Most supplemental services will be provided by the TN MEP's service team. In the case that it is necessary that a C.O.L provide a service, they should remember the TN MEP's strengths-based and empowerment-based approach, which means our role is to empower families as self-advocates so that they have the tools they need to advocate for and claim the rights of themselves and their children.

Be Aware of Federal, State and Local Requirements

C.O.L.s must be aware of state, local and federal requirements that impact identification and recruitment. In Tennessee, this includes that everyone in Tennessee is a mandated reporter under state law. Any person with reasonable cause to believe a child is being abused or neglected must, under the law, immediately report to the Tennessee Department of Children's Services or to local law enforcement. C.O.L.s also need to be familiar with the Family Educational Rights and Privacy Act (FERPA), the federal law that protects the privacy of student education records from unauthorized release.

Remember that a Community Outreach Liaison is not Alone

C.O.L.s frequently work very independently as they travel through regions in order to identify and recruit students. However, ID&R is a team effort. It is important for the C.O.L. to understand that identifying, recruiting, and determining the eligibility of migratory children is the mutual responsibility of the C.O.L. and the ID&R team. When the C.O.L. has questions or needs help, there are other people who work in the MEP at the local, state, and federal levels who can assist. For example, local program staff may be able to provide leads on children who may be eligible for the TN MEP, a recruitment supervisor may help in planning recruitment strategies, and state staff may be able to assist in resolving eligibility questions.

Statewide Identification and Recruitment Manager

The ID&R team is guided by personnel in the role of the Statewide ID&R Manager. The Statewide ID&R Manager holds the following responsibilities:

- Implements a formal process to map areas within the state where migrant families are likely to reside and trains C.O.L.s in how to use and contribute to these maps
- Leads the development of procedures to effectively identify and recruit eligible migrant children, including leading the creation and periodic revision of the statewide recruitment plan
- Trains and guides recruiters on ID&R guidelines and determinations
- Supervises C.O.L.s in carrying out statewide recruitment efforts and monitors those efforts.

- Oversees the quality control procedures designed to ensure the accuracy of a recruiter's eligibility determinations
- Oversees the periodic evaluation of the effectiveness of ID&R efforts and revises procedures as needed.
- Obtains and maintains, with the support of the ID&R team, current information on Tennessee's agricultural and fishing activities in order to determine concentration areas and peak employment periods.
- Leads the maintenance of the current list of migrant housing in Tennessee as well as Tennessee's ID&R network.

Conclusion

Reaching migratory children and youth is at the heart of the TN MEP, and the importance of effective recruitment cannot be overemphasized. Without a good C.O.L., the migratory children in most need may not be served. The effective C.O.L. can become the center of a network that connects migratory families and youth to schools and communities. When migratory families trust the C.O.L., they are much more likely to tell him or her when new migratory families move into an area. When growers and other employers trust the C.O.L., they are more likely to allow recruitment at employment sites and to support the MEP.

Source: *OME National Identification and Recruitment Manual*, p. 13

Chapter 3 - Identification and Recruitment Strategies

How Do We Identify and Recruit Eligible Students for MEP?

Through years of gathering and sharing data, the Tennessee Migrant Education program has crafted various strategies for identifying and recruiting potential new students. Many of the strategies and solutions used by the TN MEP are outlined here in this *Plan and Manual*, but each C.O.L. brings their own unique knowledge and experience to the job and is encouraged to find creative solutions and strategies that work best for them.

C.O.L.s devote the majority of their time working *out in the field*. Being out in the field means spending time in the communities and counties where migrant workers are located, and may include spending the day visiting local sites where migrant workers can regularly be found. The types of locations C.O.L.s are required to visit can fit into four basic categories: Farms, Housing Sites, Community Contacts, and Partner Organizations.

All C.O.L.s are assigned counties (where the majority of their ID&R efforts will occur) based on the region in which they work. However, all C.O.L.s will be asked to identify and recruit in neighboring regions as necessary, especially during peak seasons or when more support is needed.

As C.O.L.s will often have to drive to more remote rural locations in order to conduct ID&R efforts, some longer working days are required in order to take advantage of a C.O.L.'s travel time and reduce the amount of driving done between recruiting areas. If a C.O.L. must conduct a longer working day due to travel, these hours will be balanced out on another day of the week. These travel schedules and working hours must always be created with and approved by a C.O.L.'s supervisor.

Visiting Farms

One of the primary locations C.O.L.s need to visit are agricultural businesses across the state such as farms, nurseries, processing plants, etc.

The Tennessee ID&R team maintains a list of each county's major farms and agricultural businesses in the 'TN MEP County Profile' document. Each county profile is located on the Google Drive in the Identification and Recruitment folder. This list is a key starting point for identifying farms in the area.

The C.O.L. should speak to other the TN MEP staff who have worked in the area and research agricultural businesses in their area to identify the businesses that are most likely to employ migrant workers. A good rule to follow for new C.O.L.s is that the larger the business, the more likely they are to employ migrant workers. When a new business is found, it should be added to the county's profile for future reference.

The C.O.L.'s approach when talking to various agribusinesses depends on the program's relationship with the business in question. If the program has a pre-existing relationship with the business, it is best for the C.O.L. to call ahead to find out when the best time would be to visit. If this is a first contact, the C.O.L. should attempt to speak to the business owner, manager, or Human Resources (H.R.) department to explain the program and services that are provided.

When speaking with agricultural businesses it is always best to be respectful of their time and to not speak to workers while they are working (unless you have been given direct permission to do so). It is always best to speak to workers while they are on break. After initial introductions, C.O.L.s should ask potentially eligible workers for their addresses, so they can visit their homes and have a more thorough conversation to determine eligibility and fill out a Certificate of Eligibility (COE).

Visiting Housing Sites

Besides visiting farms, it is also important for Community Outreach Liaisons to visit locations where potentially qualifying families might live. It is common for migrant farmworkers to live in the same housing annually when they arrive. The Tennessee ID&R team maintains a list of housing sites commonly used by migrant workers in the *TN MEP County Profiles* document on the Google Drive. C.O.L.s are encouraged to review the listed housing sites in the county profiles before going into the field. New housing sites are added to the county profiles as they are found.

Just as C.O.L.s should research local agricultural businesses, C.O.L.s should also research locations where migrant farm workers might live by looking at previous addresses of qualifying families, speaking to other the TN MEP staff, and identifying apartment complexes, trailer parks, and other housing close to large farms. Additionally, C.O.L.s should always check their region's H2A listings on the Google Team Drive, because farms are required to report all addresses at which H2A workers are living.

When visiting potential farm worker housing, some possible indications that migrant workers might be living there are:

- Farm equipment outside of housing
- Large box trucks (often used to haul produce)
- Muddy boots on the porch
- Muddy tires
- Panel work vans
- Power lines above a field indicating farm housing
- Produce boxes
- Out-of-state license plates (especially from Florida and Georgia)
- Signs advertising farm work
- Tobacco stems in the yard
- Tomato buckets (red plastic buckets used to carry tomatoes)

- Trailers on farm property

Visiting Community Contacts

There are often key members of the community with whom it is important for Community Outreach Liaisons to contact and network. These contacts can include crew leaders for local farms, migrant liaisons in the school district, previously qualifying families and more. C.O.L.s should reach out to these contacts before visiting and schedule a time that is convenient for them. The Tennessee ID&R team maintains a list of community contacts in the TN MEP County Profiles document on the Google Drive.

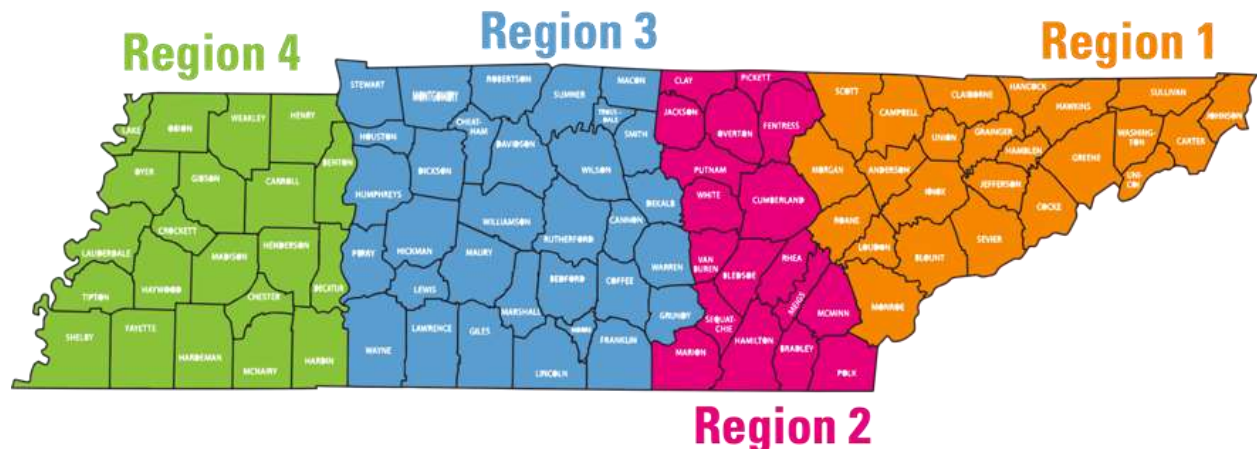
As C.O.L.s develop relationships with these contacts, they can often be the 'eyes and ears' of the C.O.L. in the community. C.O.L.s should reach out to these contacts even during the off-season to continue building a partnership with them. C.O.L.s are encouraged to add new community contacts to the county profiles when they find them.

Other important community contacts include stores and locations frequented by migrant farmworkers. C.O.L.s should do research on local stores that migrant farmworkers might visit, laundromats in the community where workers might wash their clothes, and restaurants where workers might eat. It is a good idea to visit these locations frequently during peak seasons, ask as many questions as possible, and hang up flyers in clearly visible areas so any potentially qualifying families might see them.

Visiting Partnering Organizations

The TN MEP is often not the only organization or program working with migrant workers in the area. It is good for C.O.L.s to research local organizations that might overlap with the MEP. Possible organizations can include Migrant and Seasonal Head Start (MSHS) preschool programs, farmworker health programs, organizations offering Adult ESL classes, religious organizations, and refugee organizations. C.O.L.s should meet individually with each organization to introduce themselves and the program. Besides getting possible referrals, it is important for C.O.L.s to have relationships with local organizations so they can refer families and students to these organizations when they have needs that the TN MEP cannot meet. Be aware that members of the TN MEP's service team are also working with many of these same partnering organizations around service-provision. When contacting a partner organization, include your regional colleague in the service team so that communication can remain fluid and information can be shared.

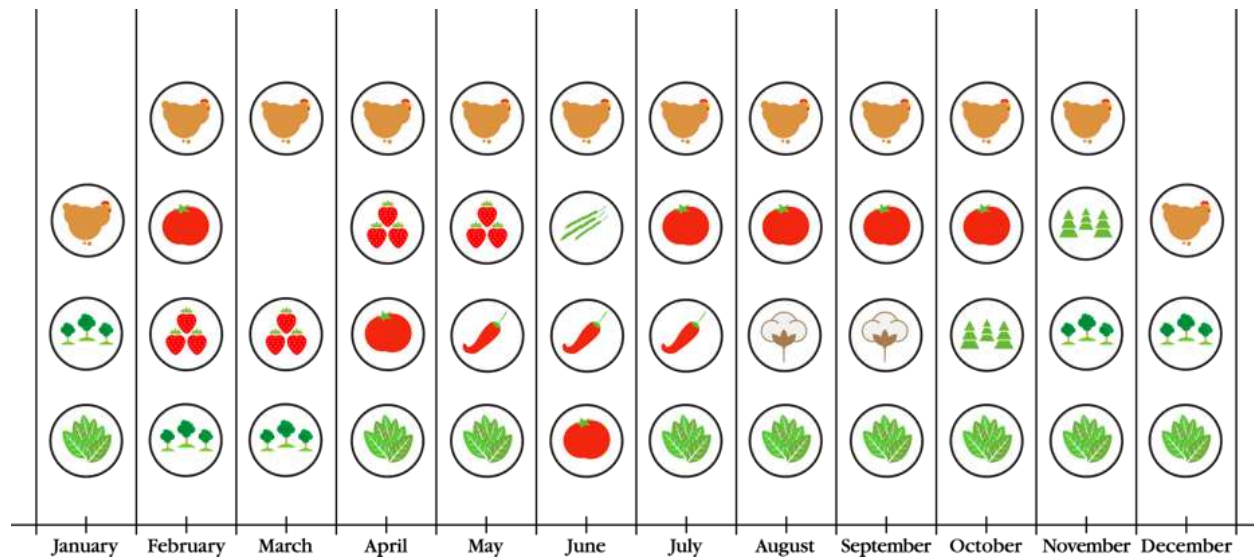
Tennessee Migrant Education Program Regional Map



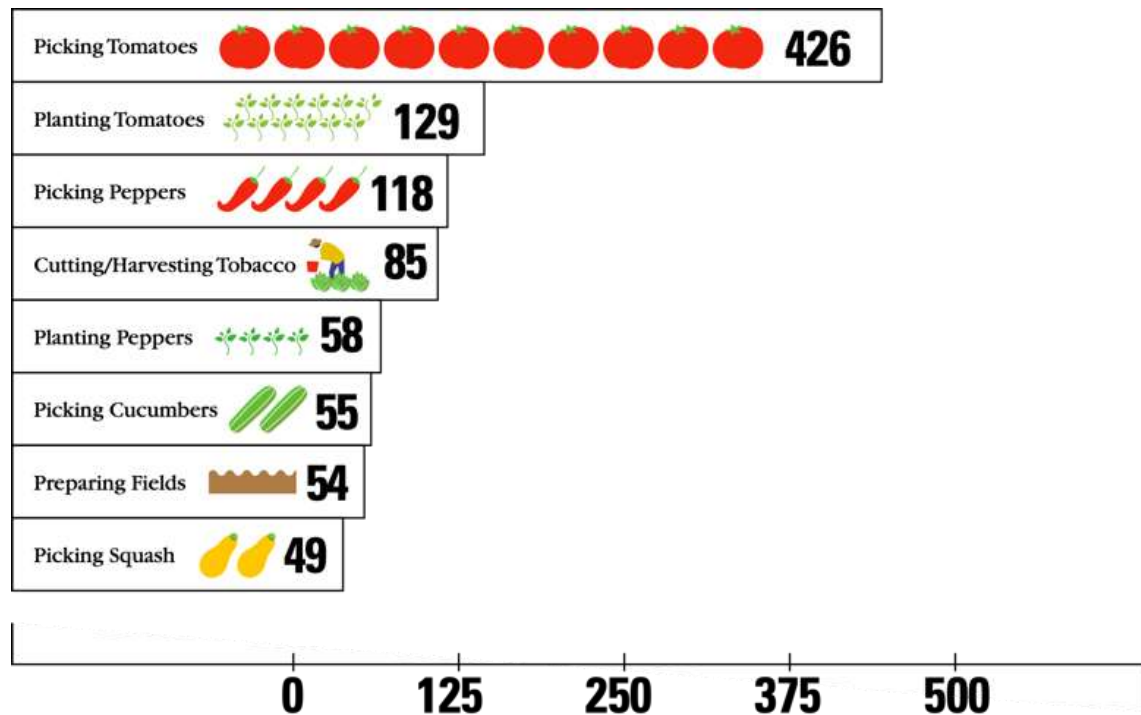
Common Crops worked by Migrant Farmworkers across Tennessee



Common Tennessee Crops by Season



Most Common Qualifying Activities for Migrant Farmworkers in Tennessee³



³ Resource from the Tennessee Migrant Student Profile. 2018-2019 data.

Systematic Research of Local Agriculture

The value of developing and fostering key contacts within the migratory community cannot be overstated. As a starting point, the Community Outreach Liaison should learn as much as possible about their recruitment area. In particular, the C.O.L. should find out what is known about the local migratory community and which local people and organizations are trusted within that community. Local people and organizations are the C.O.L.'s best sources of current and accurate information and referrals. Once the C.O.L. has identified these important contacts, the C.O.L. should determine how best to build strong working relationships, to exchange information on an ongoing basis, and to promote the TN MEP.

The C.O.L. may be instructed by their supervisor to "talk with farmers" or "go to the schools." But a new C.O.L., or even a seasoned C.O.L. taking on a new territory, needs to know *which* farms and schools are the most likely to have migratory children in order to be productive. Conducting basic research will help the C.O.L. find migratory children more quickly and efficiently. This is particularly true for those children who are not in school and are more difficult to identify, such as preschool-aged children and out of school youth (OSY).

Some key questions the C.O.L. should try to answer through this research include:

- What is already known about migratory workers in my local area?
- Who are the local agricultural and fishing employers?
- What are the employers' work activities (e.g., packing freshly picked apples, etc.)?
- Which of their jobs are temporary or seasonal?
- Which employers hire migratory workers (i.e., workers who have moved to this community to do this type of work)?
- Where are the employers located?
- Where do the migratory families who work for these employers reside in the local area (e.g., migratory labor camps, apartments, trailer parks)?
- Where do the migratory workers in the area come from (i.e., where do they consider to be 'home base')?
- When do migratory workers leave the area (i.e., what time of year)? Do they look for temporary or seasonal employment in agriculture and fishing in other places? When do they return?
- Where do migratory workers go to seek employment?
- What type of seasonal or temporary employment do they seek?

This type of information can be found through a number of sources, including websites and the field offices of federal, state, and local agencies that focus on agriculture, fishing, labor, and housing issues. LEAs and community organizations that work with migratory families are also good sources of information.

Some general Internet sites can be helpful resources for a C.O.L. For example, a C.O.L. can go to an Internet mapping service, such as Google Maps (<https://maps.google.com>), and enter the name of a local town and state and a search word (e.g., migratory, migrant, orchard, farm, nursery, name of a specific crop, laundromat). The mapping service will provide names and addresses of businesses or organizations related to the search word, along with a map that indicates where each site is located.

In some communities, migration patterns are so well established that the local MEP staff already know in which residences migratory families and youth live and which employers hire them.

Source: *OME National Identification and Recruitment Manual*, p. 27

Recruiting Checklist for the Field

Perhaps there is nothing more important for a Community Outreach Liaison than being prepared. The following is a list of items that a successful C.O.L. should always have when conducting identification and recruitment work in the field.

- Backpacks
- Bandanas
- Cell phone
- Cell phone charger
- Emergency contact information
- English as a Second Language (ESL) books
- TN MEP Flyers
- Gloves
- List of farms in the area (Include farms with H2A Workers)
- List of local resources that can easily be distributed
- Mace (personal defense spray)
- Map of the region
- Recruiting tablet
- Spanish/English dictionaries
- Hygiene products for OSY

Building an Identification and Recruitment Network

The primary benefit of a recruitment network is to get referrals of potentially eligible migratory children and youth. Each time the C.O.L. interviews a migratory family, the C.O.L. should ask if the family knows of other migratory families or OSY in the area that the C.O.L. should visit. Furthermore, the C.O.L. should actively seek out new organizations to add to the recruitment network. It takes time and effort to build and sustain a recruitment network, since the C.O.L. must continually make fresh contacts, as well as

nurture long-standing contacts. However, the benefits outweigh the time commitment required. Here are some strategies for building and maintaining networks.

Personal Relationships Build Professional Relationships

Migratory families often use personal relationships to share information about jobs, housing, schools, and services (including the TN MEP services). Information shared within these informal networks often moves faster than more formal communications (e.g., learning about job openings by word-of-mouth versus in a newspaper). The C.O.L. can learn valuable lessons from migratory families about how to develop and maintain a network. Over time, the C.O.L. will develop their own networking and communication strategies to develop a strong professional recruitment network.

First Impressions

Making a good first impression can be critical when a C.O.L. meets a potential member of the recruitment network. The C.O.L. should be friendly, but should also be sensitive to the responsibilities and workload of the contact. The C.O.L. who is met with resistance may find it helpful to locate someone who already has a good relationship with the contact and who can allay any concerns the contact might have about the MEP (e.g., a peer, a respected school or community leader, another local agricultural employer who has given permission to be contacted, or a migratory family who is familiar with the TN MEP).

Establishing Trust

People often decide within the first 15 seconds of meeting someone whether or not they are going to trust them. Whether C.O.L.s are meeting a farmer, someone in the community, a representative for the school district, or a potential qualifying child and their family, it is critical that C.O.L.s make a good first impression. Those first fifteen seconds can decide whether or not a C.O.L. will be given the information they need to recruit potential migrant children to receive supplemental services from the program. Farmers will not want to let a C.O.L. speak to their employees if they feel like the C.O.L. cannot be trusted, and migrant families will not share with the C.O.L. the contact information of their friends if they feel it could be dangerous to do so. Every C.O.L. must work hard to find their own methods for building and establishing trust, but the following strategies have been found by experienced C.O.L.s to be a good starting point.

- **Always Speak to the Person in Charge:** One of the mistakes a C.O.L. might make is to speak with children without first asking their parents' permission or to speak with farmworkers during working hours without first asking permission from their employer. C.O.L.s should always start by speaking to whomever is in charge at a work site (or to parents, if visiting a residence, to get permission to be there). Speaking first with the person in charge lets others at the site know that it is okay to speak freely with the C.O.L., and it lets them know that the C.O.L. has good intentions.
- **Conduct Group Interviews if Necessary:** C.O.L.s will often face situations in which they need to find out who, within a large group of people, is eligible for the program. Focusing on individuals in these situations can create unwanted attention and pressure for the people involved. Workers

might not want to truthfully share their information if they feel like they are being targeted. When necessary, C.O.L.s should ask questions to the entire group before singling out individuals. Asking questions to the entire group releases unwanted pressure for those who may qualify. For example, instead of asking each individual how old they are, the C.O.L. might ask, "Who here is 21 years old or younger?" or instead of asking each individual how long they have been living in the area, the C.O.L. can ask the group, "Who here has been living in this area for 36 months or less?"

- **Know your Audience:** Knowing to whom you are going to be speaking and how to approach each situation is critical for any Community Outreach Liaison. While our first instinct may be to dress up for work, business or more formal attire can be off-putting for some farm workers. Showing up to a farm or a potential qualifying family's home in business attire can inspire unwanted suspicions. C.O.L.s should always think ahead about who their audience will be, while recruiting or before entering a meeting, and should plan accordingly.
- **Emphasize Connection with Local School System:** The Tennessee Migrant Education Program works closely with local school systems to ensure they are meeting the needs of the children in the program. C.O.L.s should use the connection between MEP and the local schools whenever necessary to help establish trust when recruiting. People almost universally agree that education for children is important. Telling families or employers that C.O.L.s work alongside the local schools will often alleviate any worries they may have.
- **Find Common Ground:** C.O.L.s should not begin conversations by immediately asking farm workers or potential families questions about program eligibility. It is better for C.O.L.s to attempt to get to know farm workers and families on a personal level before attempting to gather information and make an eligibility determination. For example, C.O.L.s can ask farm workers about the kind of work they are doing, how the work is going, what other kinds of jobs they have had in the past, etc. C.O.L.s can ask families about how their children are doing in school or how they are liking living in the area. C.O.L.s should always be looking for anything they may have in common with the people to whom they are speaking to help make them feel more comfortable.
- **Pay Attention:** C.O.L.s should always be looking for signs that they are making people uncomfortable. Good C.O.L.s should be able to recognize when people are hesitant to speak to them or when they might have crossed a line in their questioning and should be able to adjust their tactics accordingly. If a C.O.L. sees body language indicating the person to whom they are speaking is becoming uncomfortable, they should try to de-escalate the situation or leave and offer to come back at another time when it is more convenient.
- **Presentation is Key:** As mentioned above, people often decide within the first fifteen seconds of meeting someone whether or not they are going to trust them. As such, a C.O.L. must make sure that they are presenting themselves and the program in such a way that the person to whom they are speaking is willing to learn more. Every individual a C.O.L. meets has different needs, and C.O.L.s need to be sure that they are keeping the context of the situation in mind when they are presenting the program. For example, a C.O.L. should not present the program in the same way to a farmer as they would to a representative of the local high school. C.O.L.s should present the program to each individual in a way that highlights how the program would benefit that person. For example, a C.O.L. might explain to the farmer how the TN MEP can help their employees learn

English and so improve communication with the farmer. If a C.O.L. is speaking with a school representative, they can highlight how the program has helped improve standardized test scores for migrant students in other school districts.

- **Timing is Important:** People's time is very valuable. One reason that someone can quickly lose trust in a C.O.L. is if the C.O.L. is trying to speak to them at an inconvenient time. C.O.L.s should not speak to farmworkers without permission if they are out in the field, because this could get the worker in trouble with an employer. Instead, C.O.L.s should ask when a better time to visit would be or ask if they can come and visit the worker in their home after work hours. Likewise, C.O.L.s should be respectful of people's time in their homes. C.O.L.s should not be visiting homes too early in the morning or too late at night, unless a family has given them permission to do so. C.O.L.s should always work to meet people at the time that is most convenient for them, because it lets them know that C.O.L.s are there to help.

Occupational Surveys

All newly-enrolled students in the state of Tennessee will receive an *Occupational Survey* to complete at home in either English or Spanish with their school's introductory Welcome Packet. It is a Department of Education requirement that all students in the state have a completed copy of the Occupational Survey in their student record. The *Occupational Survey* is a form produced by the TN MEP program in partnership with the Tennessee Department of Education with the aim to identify families enrolling in the school districts that meet two or more of the necessary eligibility requirements for the TN MEP. The form is administered by each school during school registration. The Migrant Liaison for each district then filters the occupational surveys and transfers them via a secure server to the TN MEP.

While the ID&R staff make every effort to identify all eligible students, it can be difficult to locate students who qualify based on previous moves or move history. The occupational surveys given out at the schools go a long way to help bridge the gap and identify eligible students that the ID&R team might have otherwise missed.

The *Occupational Survey* asks families about their work and movement history and uses clear visual images of different types of agricultural work to aid families in understanding the questions being asked. The Occupational Survey has been a great success across the state, with a third of all surveys given to ID&R staff (after being pre-filtered by the Data and Compliance Coordinator) leading to obtaining a COE. To better understand the process through which occupational surveys go, please see the chart below.

The Occupational Survey Process

Occupational surveys are revised and updated annually based on feedback from Tennessee Department of Education, District Migrant Liaisons, MEP Staff, and Migrant parents who have filled out the survey.

The Updated Occupational Surveys are shared each year by the Data and Compliance Coordinator with Migrant Liaisons in each school district via the secure server TNMigrant.

The Migrant Liaisons give a copy of the Occupational Survey to all new and returning students as part of their enrollment package at school. If the student or their parents have moved to the area for agricultural work, then they may be a migrant student.

Each school sends Occupational Surveys with at least one "YES" to the District Migrant Liaison and uploaded the surveys to the TNMigrant secure server site (tn.msedd.com) upon receipt.

The Data and Compliance Coordinator notifies MEP Community Outreach Liaison of new Occupational Surveys. The C.O.L. conducts a home visit for each survey and interviews the family to determine if they are eligible for migrant education services.

Once the family is assessed and if they qualify for the Migrant Education Program, the Community Outreach Liaison will complete a Certificate of Eligibility (COE) for the student and their family.

If the student is certified as migrant, the Data and Compliance Coordinator will notify the school district and send the Migrant Liaison a copy of the student's COE.

Migrant student lists will be provided monthly in the TNMigrant site. Please review your list each month and insure that the migrant student classification (I) is entered in your SIS/EIS for each student that appears on the list. As new migrant students enroll in your district, please upload the migrant student classification.

Identifying and Recruiting OSY- H2A Workers

One of the most important indicators that a farm may currently have workers eligible for the TN MEP is whether or not they hire H2A workers (foreign workers who receive visas to come work on farms for the season). The TN MEP has found that farms who hire workers through the H2A agricultural visa program usually hire outside help as well. Farmers' requests for H2A workers are freely accessible through the United States Department of Labor.

The Statewide ID&R Managers maintain an updated database of all farms in the state of Tennessee with active H2A requests. The H2A database is one of the most important tools available to C.O.L.s. The database stores the name of the farm, the address of the farm, contact information for the farm, the

address of the fields, the address of housing for H2A workers, dates the workers will be arriving and leaving the United States, and even a loose schedule of when the workers are working.

Before going out to recruit, the first thing a C.O.L. should do is look at the H2A database to see if there are any farms with H2A workers in the counties in which they will be working. C.O.L.s are encouraged to visit all farms with H2A requests to check if any of the H2A workers are eligible for MEP and to see if the farm might have other workers who are eligible. Each Region's H2A database can be found by going to the *Identification Folder* on the Google Team Drive, opening the *Recruiting Resources Folder*, opening the H2A Listings folder, and then opening the regional folder.

C.O.L.s can obtain the H2A requests for themselves by going to the United States Department of Labor website (<https://seasonaljobs.dol.gov/>). Once on the website, C.O.L.s can conduct a search for farms in their area or across the entire state. For an in-depth explanation of how to navigate the Seasonal Jobs website, please see the training materials located in the Identification and Recruitment folder on the MEP Google Team Drive.

Group Recruitment Efforts

Another strategy employed by the Tennessee MEP is 'Group Recruitment Efforts,' also known as 'Recruiting Blitzes.' Group Recruitment Efforts occur when multiple C.O.L.s and out-of-state recruiters are brought into a county or geographic area so that they can cover the area as thoroughly as possible. When out-of-state recruiters are brought in to help with Group Recruitment Efforts, they are paired with a member of the Tennessee ID&R team to work out in the field together. Working with out-of-state recruiters can vastly improve the knowledge and skills of in-state ID&R staff, as this allows them to share experiences and see how other states do the work.

Group Recruitment Efforts can be organized for a variety of purposes. They can be used during peak seasons when a region needs more help to identify and enroll all eligible migrant students in a timely manner. Group Recruitment Efforts can also be used to explore new areas that have not been recruited, complete re-interviews, and follow up on large numbers of Occupational Surveys.

Identification and Recruitment "Buddy System"

One of the major challenges that ID&R staff face in the field is that recruiting often requires C.O.L.s to work alone for long periods of time. The Tennessee MEP has organized what they call the 'Buddy System' to help improve team unity and staff self-care. The Identification and Recruitment 'Buddy System' calls for all ID&R staff to work in the field at least once a month with another C.O.L.s or Tennessee MEP staff. On days when C.O.L.s are working together, they are often paired with C.O.L.s from other regions so they have the opportunity to work with a partner and learn more about how ID&R works across the state. The Buddy System also allows (during slower times of the year) for ID&R staff to shadow Education Advisors to see firsthand how services are delivered; Conexión Américas staff are invited to shadow C.O.L.s to learn

how the ID&R team works. In addition to its benefits around staff safety, we have also found that it is positive for productivity.

Conducting an Eligibility Interview

Community Outreach Liaisons have to determine the eligibility of all potential students based on information gained by conducting in-person verbal interviews. C.O.L.s are encouraged to primarily conduct eligibility interviews in the homes of potential students so they do not interfere with a family's work. However, eligibility interviews can also take place wherever a C.O.L. may find a potential student.

To gather the necessary information that C.O.L.s need to make eligibility decisions, it is useful to have a working toolbox of questions to ask the worker/family. The following are some suggestions for how to introduce oneself, utilize fact-finding questions, and close the conversation. It is very important to be prepared and know how to present oneself and the program in multiple situations. That said, recruiting is not limited to simply asking the following questions. These questions are simply suggestions to help the C.O.L. to be prepared.

Conducting eligibility interviews can be difficult and it is important to remember that at times one might need to ask the same question, or variations of the same question, multiple times to obtain the necessary information.

Interviews should be conducted whenever possible in the language in which the family feels most comfortable in responding.

Introduction to Eligibility Interview

- Good morning, good afternoon, good night, etc.
- My name is _____. I work with a program called the Tennessee Migrant Education Program. We are an educational program that helps those who came here to work on the farms. (Show organization ID)
- We have tutors that can come and help your children in school, we have summer programs and after-school programs, and we have books for your children to read.
- I would like to see if you and your family qualify for our program.

Fact-Finding Questions (Five Eligibility Variables: How, What, Who, When, Why?)

- Are you, your family, or any member of your family new to this area?
- How long have you been in this city?
- When was the last time that you or any member of your family arrived in this city?
- Where did you come from?
- What kind of work did you do there?
- What was your reason to come to this area or town?

- What kind of work did you come for?
- Are you working now?
- How long are you planning to work in that?
- Where are the other members of your family working?
- Note: If you are qualifying anybody under a temporary job, you have to write in the comments section of the COE the statement that the worker or employer gave you. You must ask as many questions as you need in order to make it clear in your mind.
- And after you finish with that job, what are you going to do?
- Where are you going to move?
- How old are you?
- Is anybody younger than 22 living with you or your family?
- Did they finish high school?
- What is the highest grade they finished?
- Do you have any children?
- Did they move here with you?
- Were they already here?
- How long ago did they arrive (come)?
- Why did you and the child(ren) not move at the same time? (Enter statement)
- How old are the children?
- Are they already going to school in this town?

Interview Closing (Finishing Identification Phase of ID&R)

- I think you may qualify for the TN MEP. Can I fill out this form so we can be in contact with you about our services?
- I am sorry, you don't qualify for our program, but there are some other programs that may be able to help you.
- I am sorry you don't qualify for our program, but there are some programs in school to help your child, if they have problems related to language barriers, etc.

Determining Eligibility

In order to make adequate and accurate decisions regarding eligibility, the Community Outreach Liaison must gather as much relevant information as possible to help complete the Certificate of Eligibility.

Additional information or documentation the C.O.L. may wish to collect and/or review to support the determination includes:

- Notes from the eligibility interview, including the family's work history;
- School data (e.g., names and enrollment records from schools attended in the past);
- Employment data (e.g., employment records, pay stubs, job applications, names of past employers);

- Crop data (e.g., approximate dates of temporary or seasonal crop activities, qualifying local production, and processing activities);
- Migratory child database records, such as the MSIX or an independent state database;
- Family documents (e.g., birth certificates, health immunization records);
- Names of other families with whom the family has worked or traveled;
- Information from the recruitment network that helped the C.O.L. to identify the worker or family (e.g., written and verbal referrals from community agencies, school personnel, employers);
- C.O.L.'s personal observations, including whether or not such observations are consistent with the information provided by the interviewee; and
- Other relevant documentation.

The C.O.L. should remember that records from other states, including copies of COEs, may help inform eligibility determinations. However, each State must make its own eligibility decisions because each State is responsible for ensuring the eligibility of each child included in its annual child count.

The C.O.L. should use their analytical skills and all available resources (both material and people) to make a preliminary determination as to whether or not a specific child meets the definition of a migratory child. To make that decision, the C.O.L. should review the information gathered at the interview along with any other relevant sources of information. The C.O.L. should also consider contradictory information from other sources or from observations that lead the C.O.L. to doubt or question the interviewee's responses, such as school records that do not match interview information. For example, there may be a case in which school records show that the child attended school every day in September, but the parent says they moved out of state for two weeks in September to pick apples. The school records might indicate that the child did not move with the parents.

The timing of moves for both the child and the worker is a critical consideration. The child and the worker must have made a qualifying move within the preceding 36 months of the interview. (See Non-Regulatory Guidance Chapter II "Child Eligibility" pages 9-34 for complete eligibility requirements.) However, the child and the worker do not necessarily need to have made qualifying moves at the same time for the child to be eligible for the MEP. While in the majority of cases the child moves with the worker (if the child is not the worker), in cases where the child and worker move at separate times, developing a timeline will assist in verifying that both the child and the worker have made qualifying moves within 36 months of the interview. A timeline will also assist in determining the Qualifying Arrival Date (QAD) for the child. In addition, the C.O.L. should record the date on the timeline when the worker was last engaged in qualifying work or when the worker engaged in new qualifying work in order to determine if the worker meets the definition of 'migratory agricultural worker' or 'migratory fisher.'

Following are key dates to consider when determining eligibility:

- Making a qualifying move in the 36 months preceding the date of the interview (NRG, Ch. II, A1.)

- Engaging in work “soon after the move” (60 days) (NRG, Ch. II, C10)
- Recent history of moves (no longer than 36 months preceding the date of the interview) (NRG, Ch. II, C16)
- The period of time that separates the worker’s qualifying move from a child’s qualifying move to join a worker or vice versa (12 months) (NRG, Ch. II, E4)
- The time period for when employment is considered “seasonal” or “temporary” (12 months) (NRG, Ch. II, G3 and G5)

Source: *OME National Identification and Recruitment Manual*, p. 78

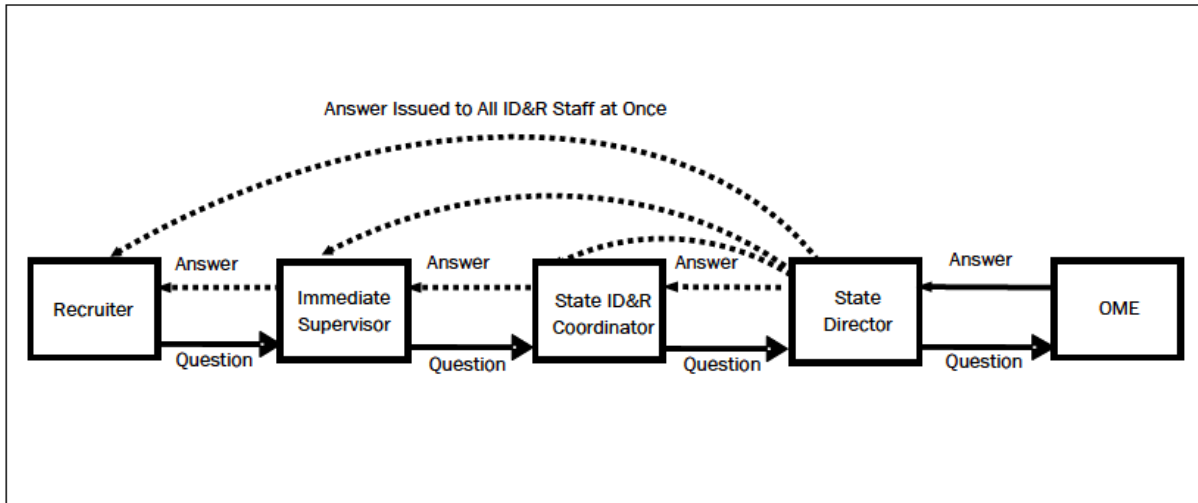
When to Ask Questions: Determining Eligibility in Difficult Situations

At times, the Community Outreach Liaison may face situations that are beyond the scope of their knowledge or level of authority. In this situation, it is imperative that the C.O.L. take detailed notes during the interview because this will allow the C.O.L. to effectively research any lingering questions at a later time. The C.O.L. should check to see if the question has already been answered in the state’s ID&R materials (e.g., the *State ID&R Manual* or state policy letters) or in the *Non-Regulatory Guidance for the Title I, Part C Education of Migratory Children* (NRG). If the C.O.L. cannot find the answer in any of the written materials, the C.O.L. should talk with knowledgeable peers in their state to see if any of them have encountered a similar situation, and if so, find out how it was resolved. Finally, the C.O.L. will also want to consult with a supervisor. To help the supervisor understand the scenario, the C.O.L. should clearly present all of the relevant facts. As a general rule, the individual who asks an eligibility question should provide as much applicable background information as possible, including information on each eligibility factor found in the Child Eligibility Checklist. The C.O.L. should also tell the supervisor whether they think the child or youth is eligible and explain their rationale.

The C.O.L.’s supervisor, who will try to answer the eligibility question, should make sure they understand all of the relevant facts, asking for additional information when needed. Once the supervisor has a clear understanding of the issue, the supervisor should:

1. Check to see if the question is answered in Tennessee’s ID&R Plan and Manual or in the NRG, and
2. Determine if there is a precedent by speaking with the Statewide Identification and Recruitment Manager

If there is a clear answer, the supervisor should provide that answer to the C.O.L. If not, the supervisor should move the question through the state’s official process for resolving eligibility questions. The chart below shows how a question from a C.O.L. moves through the chain of command within the TN MEP and how the answer moves back to the C.O.L. If the supervisor does not know the answer to a question, the question is referred to the next person in line, generally the Statewide ID&R Manager, who will perform the same analysis that the local supervisor conducted.



Source: OME National Identification and Recruitment Manual, p. 80

Making Safety a Priority

Due to the demands of the job, C.O.L.s often have to converse with strangers, enter into homes and other locations with which they are unfamiliar, and travel to remote areas with unreliable cell service. It is essential for C.O.L.s to always keep their own personal safety in mind and take precautions whenever needed. First and foremost, C.O.L.s should never feel obligated to do something they do not want to do. C.O.L.s must keep their own limits in mind and act accordingly. If the C.O.L. hears about a lead in a place they do not feel comfortable visiting alone, they should share that information with their supervisor and express their concerns. The supervisor will work with the C.O.L. to discuss alternatives with which the C.O.L. feels safe and comfortable.

The Tennessee Migrant Education Program has created a manual to encourage safety of all MEP staff and to provide tips and advice for working out in the field. The document is accessible by all MEP staff on the Migrant Education Program Google Team Drive by going to the Staff Information Folder and then the Safety Folder. The safety manual is inside the Safety Folder and is called *Staff Safety Manual TN MEP*.

Team Check-ins and Procedures

Every month all Migrant Education Program staff meet as a team to share their various success stories, hear updates on what is happening within the program across the state, outline future plans for the program, and help build team unity. Besides monthly staff meetings, the TN MEP also holds monthly Leadership Team meetings to communicate what is happening between different teams within the program, and brainstorm new ideas. The Leadership team consists of the MEP Associate Director, Data and Compliance Coordinator, MEP Program Coordinator, Curriculum Design Manager, Statewide ID&R Manager, another member of the ID&R team, and the Regional Service Managers. The TN MEP also holds

Regional meetings for Regional Service Managers, Regional Education Advisors, and Regional ID&R staff to share what is happening locally within each region.

Chapter 4 - Documenting our Efforts

Why We Document our Efforts

The Migrant Education Program is a federal program funded through a contract with the Tennessee Department of Education with federal funds. It is critical for the TN MEP to properly document all efforts to comply with federal and state regulations and to document and justify how funds are being spent. Monthly reports and documentation allow the TN MEP to ensure transparency in our work and to remain accountable to the students we serve and to program requirements.

Documentation of all aspects of the TN MEP's work allows managers and leadership to analyze the team's work and efforts in real time and make quick and informed decisions. This quick turn-around is especially important during peak season, when the majority of migrant farmworkers are arriving and the service team is enrolling students in summer camp. As a result of careful documentation, the TN MEP's Leadership team and managers are able to look at all data presented to determine the best course of action to ensure team efficiency and effectiveness.

The Certificate of Eligibility

In order for a child to receive the TN MEP services, their eligibility must first be documented. After a C.O.L. has conducted the eligibility interview, they must fill out a Certificate of Eligibility (COE) for each family that qualifies. The COE document, which is based on the national guidelines and adapted for use in Tennessee, helps the MEP track the eligibility and enrollment information of every child in the program.

In July 2020, the TN MEP transitioned from using primarily paper COEs to Electronic COEs (ECOEs). Paper COEs from July 2020 onward will only be used by MEP staff who are not directly on the recruitment team, or by the recruitment team if it experiences technical difficulties with the electronic platform or computer equipment. The process for filling out paper and electronic COEs is detailed below.

If a family has multiple children, they can all be listed on the same COE. A completed COE contains information for all eligible students in the family between the ages of 0 and 21. This includes students currently enrolled in school, preschool students under the age 4, and any students of school age who have left school or are not currently enrolled. Children who were born after the Qualifying Arrival Date (QAD), who have graduated from high school, or who have completed a high school equivalency exam do not need to be included on the COE. A new COE should be completed every time a child makes a new qualifying move.

Only MEP staff members are authorized to complete COEs. It is important to inform the family that all information obtained for the COE is completely confidential and will only be used by the TN MEP. The COE must be completed in full in blue ink using the information gained through the eligibility interview. The COE should be neat and legible and needs to be signed by both the C.O.L. and interviewee.

Information about the MEP and available services should be explained to the parent or guardian prior to obtaining their signature. Before leaving the location, the C.O.L. should review the COE to ensure that all sections have been completed, that there are no blank spaces, and that responses are recorded in the proper section. Any blank spaces should have responses added to them. If information cannot be gathered or is unknown, it is helpful to draw a line through the box to indicate that the information was unavailable. A separate COE must be completed for any child who has a different qualifying arrival date (QAD) or for any child who has different eligibility criteria than the rest of the children in the family. If more than one COE is necessary, the C.O.L. must complete all sections on each form.

A copy of the latest COE form can be found on the Google Team Drive in the *ID&R Documents* Folder.

Filling Out the COE

Section I: Family Data

Parent/Guardian 1 & 2 - The full name of the Parent(s)/Guardian(s) of the qualifying family beginning with the Last Name(s) and then the First Name. The guardian of the child is the individual in charge of taking care of the child. No legal paperwork is required to demonstrate guardianship. If the child is the worker, then the section is left blank.

Current Address - Record the current physical address where the qualifying child resides. Space should include all possible information to identify the residence of the qualifying child including: street name, apartment number, trailer number, number of housing barrack, etc. If the residence does not contain an address, then the nearest address must be given.

City - Record the name of the city where the qualifying child currently resides.

State - Record the name of the state where the qualifying child currently resides.

Zip - Record the zip code where the qualifying child resides.

Telephone - Record the telephone number, including area code, for the qualifying child or their guardian. If the guardian or child does not have a cell number, it is acceptable to put the phone number of someone else living with the child.

Home Language - Record the most common language spoken in the home.

Section II: Child Data

Last Name - Record the legal last name(s) for each eligible child in the family. Names should be written correctly and should coincide with the name given during school registration.

First Name - Record the legal first name for each eligible child in the family. Name should be written correctly and should coincide with the name given during school registration.

Middle Name - Record the legal middle name for each eligible child in the family. Name should be written correctly and should coincide with the name given during school registration.

Grade - Record the current grade of each eligible child in the family. If a child is found during the summer, the grade should coincide with the grade the child will be entering during the next school year. If the child is an out-of-school youth, then "OSY" should be written in the grade space if the child is under the age of 18 and "UG" should be written in the space if the child is older than 18.

Race - Records the code for the race of each eligible child in the family. Codes are as follows:

- AM7: American Indian or Alaskan Native
- AS7: Asian
- BL7: Black or African American
- HI7: Hispanic/Latino
- PI7: Native Hawaiian or other Pacific Islander
- WH7: White
- MU7: Two or more races

Sex - Record the sex for each eligible child in the family. Write "M" for male and "F" for female.

Birth Date - Record the month, day, and year each eligible child in the family was born.

Birth Place (City, State, Country) - Record the location where each eligible child in the family was born. Information should be as precise and complete as possible.

Multiple Birth (MB) – Record "Yes" if the eligible child is a twin, triplet, etc. Otherwise, write "No." National guidelines also allow for C.O.L.s to answer using the letter "Y" for "Yes" and "N" for "No."

Code - Record the code for how the information about each eligible child's birth was received. The verbal affidavit of the parent/guardian or the youth is usually sufficient evidence to confirm the information about each eligible child's birth. In such cases, the code "1007" should be written in the space provided. Other codes are as follows:

- 1003 – Baptismal or church certificate
- 1004 – Birth Certificate
- 1005 – Entry in Family Bible
- 1006 – Hospital Certificate
- 1007 – Parent/Guardian or Emancipated Youth's Affidavit
- 1008 – Passport
- 1009 – Physician's Certificate
- 1010 – Previously Verified School Records
- 1011 – State-issued ID
- 1012 – Driver's License
- 1013 – Immigration Document
- 2382 – Life Insurance Policy
- 9999 – Other

ResDate - Records the month, day, and year each eligible child in the family arrived at the current residence.

Section III – Qualifying Move and Work

The Qualifying Move and Work section documents the information on the moves and work that help to determine each child's eligibility and the move that made a member of the family eligible to be a Migrant Agricultural Worker.

The child(ren) listed above moved from a residence in to a residence in

This first space records the last place of residency of the eligible children before making the most recent qualifying move. The space needs to record whenever possible the school district, city, state, and country of residence. The second space records the location of the most recent qualifying move. The TN MEP requires the school district, county, and city to be recorded.

The child(ren) moved (complete both A and B)

Section A - On own as worker, with the worker, or to join or precede the worker [Mark one box]

- C.O.L. should mark the box "on own as a worker" if the child is a Migratory Agricultural Worker and moved in order to obtain qualifying work for themselves. It is important for C.O.L.s to remember when marking this box that children need to be 21 years old or younger to qualify.
- C.O.L. should mark the box "with the worker" if the child(ren) moved at the same time with a parent, spouse or guardian in order for the Migratory Agricultural Worker to obtain qualifying work.
- C.O.L. should mark the box "to join or precede the worker" if the child(ren) moved either before or after the date that their parent, spouse, or guardian moved in order to obtain qualifying work. If this box is marked, also complete "i" under 2b.

B - The worker, (First and Last Name of Worker), is....

- The C.O.L. should record in the space provided the first and last name of the individual who is the Migratory Agricultural Worker
- The C.O.L. should next mark the box that indicates the child's relationship to the Migratory Agricultural Worker. If the child is the Migratory Agricultural Worker, then the C.O.L. marks the box listed as "is the worker." If the Migratory Agricultural Worker is the child's Parent/Guardian/Spouse, then the C.O.L. marks the appropriate box.
- The C.O.L. should only complete section "i" if the box "to join or precede" is checked in 2a. The C.O.L. needs to record the month, day, and year the Migratory Agricultural Worker moved. Moves made to join or precede the Migratory Agricultural Worker must be made within a year of each other. C.O.L.s **MUST PROVIDE A COMMENT** in the comment section of the COE explaining why separate moves were made.

Qualifying Arrival Date (QAD) - Record the month, day, and year the child(ren) was eligible for services. The QAD is the date that both the child and the worker completed the move. The QAD of a "to join move" is the day the worker and child are united in the district to which they made a qualifying move.

The worker moved due to economic necessity on _____ from a residence

This section is for the C.O.L. to list the information that makes the worker a Migratory Agricultural Worker. Even if the move of the Migratory Agricultural Worker is the same move as the most recent qualifying move, all information should be filled out as completely as possible because under the MEP's guidelines under ESSA, the move that qualifies the worker as a Migratory Agricultural Worker does not need to be the same move as the qualifying move. The C.O.L. begins this section by filling out the date the move was performed and then lists the school district, city, state, and country in which the Migratory Agricultural Worker was living before making the move, and then the school district, city, state, and country to which they moved. Afterwards, the C.O.L. needs to check the appropriate box saying why the move made the worker a Migratory Agricultural Worker. The C.O.L. should check the first box if the worker engaged in new qualifying work within 60 days following the move. Under the ESSA recruiting guidelines, the worker needs to have not only been hired in order to qualify, they also have to have actively engaged in the qualifying work. If there were outstanding circumstances that prevented the worker from engaging in work within 60 days of the move, the C.O.L. **MUST PROVIDE A COMMENT**. The C.O.L. should mark the second box and **MUST PROVIDE A COMMENT** if the worker actively sought work, could not find qualifying work, and has a history in the last 36 months of making two qualifying moves and engaging in new qualifying work. C.O.L.s should note that the large majority of workers are eligible to be Migratory Agricultural Workers under the first option and only special cases need to use the second option.

The qualifying work _____ was....

The C.O.L. should fill in the blank with the work that the Migratory Agricultural Worker performed when they were made eligible to be a Migratory Agricultural Worker. The C.O.L. should always describe the specific agricultural or fishing work using an action verb (e.g., "picking") and a noun (e.g., "strawberries"). For example: picking tomatoes, packing strawberries, cutting tobacco, etc. Below, the C.O.L. should mark the appropriate checkbox declaring if the work the Migratory Agricultural Worker performed was seasonal or temporary, and if the work was agricultural or fishing work according to the definitions provided by the National MEP guidelines. If the C.O.L. marks the work as being only temporary, then they **MUST PROVIDE A COMMENT** in the appropriate section on the COE.

(Complete if "temporary" is checked in #5a) The work was determined to be temporary employment based on

This section need only be completed by the C.O.L. if the C.O.L. marked in section five that the work was temporary. The C.O.L. needs to note how they found out the work was only temporary by marking the appropriate box. **A COMMENT MUST BE PROVIDED** to further explain how the C.O.L. gained the information. If the C.O.L. has documentation supporting the work as being only temporary, they need to attach it to the COE.

Section IV, V, and VI: Comments, Signature, and Eligibility Verification

The "Comments" section on the COE allows for the MEP staff to include additional information when necessary. If a child or parent/guardian is in immediate need of a specific service, or if there are questions or clarifications needed about the child's eligibility, they can be recorded here. Additionally, federal guidelines require comments to be provided to explain items 2bi, 4c, 5, 6a and 6b of the Qualifying Move & Work Section. Comments would be necessary for the following scenarios:

- The child’s move joined or preceded the worker’s move. If the children joined or preceded the parent, spouse, or guardian, it is necessary to record the reason for the separate moves.
- The worker or employer states the work is temporary. In particular, it is necessary to record how long the worker or employer expects the employment to last. The comment adequately documents how the C.O.L. came to the eligibility decision.
- The children qualified on the basis of “personal subsistence,” meaning “that the worker and the worker’s family, as a matter of economic necessity, consume, as a substantial portion of their food intake, the crops, dairy products, or livestock they produce or the fish they catch.”
- The worker did not obtain qualifying employment as a result of the move. In this case, the C.O.L. must document that the worker stated that one reason for the move was to obtain qualifying work, AND
- The worker has a prior history of moves to obtain qualifying work;
- OR there is other credible evidence that the worker actively sought qualifying work soon after the move, but, for reasons beyond the worker’s control, the work was not available;
- OR both. Examples of credible evidence include a statement by a farmer that the worker applied for qualifying work but none was available, or a newspaper clipping regarding a recent natural disaster in the area that caused work not to be available.

The parent/guardian, or the child if the child is the worker, looks over the data and signs the COE, writes their relationship to the child, and dates the COE according to the day the interview was conducted. **All COEs must be signed by the individual who is the source of the information provided during the interview.** After the C.O.L. has signed the COE and submitted it, the COE is then sent to the designated reviewer who checks that the data given on the COE is sufficient and that the child may be enrolled in MEP. Once the reviewer looks over the COE, they sign and date it.

Back of the COE

The back of the Certificate of Eligibility contains three important sections. The first section is information on the qualifying child(ren’s) school enrollment. C.O.L.s should try to fill out the information as much as possible. The TN MEP recognizes that families do not always know their children’s enrollment information, but C.O.L.s should ask and investigate in which school(s) the children are enrolled so that the program can keep track and ensure the children are receiving the best services possible.

The second section on the back of the COE is a Family Educational Rights and Privacy Act (FERPA) consent form. C.O.L.s need to ask parents of each qualifying child to fill out the FERPA form because it allows the child’s school to share the child’s records with the Tennessee MEP. After the FERPA statement is signed, MEP Education Advisors can speak with the child’s teachers about how they are doing in school and can individualize lessons to better suit the child’s academic needs.

The last section is an overview of the rules for qualifying under the McKinney-Vento Act, the federal act that ensures rights and services to children and youth experiencing homelessness. C.O.L.s are tasked with identifying the students eligible for the TN MEP that might also be eligible for McKinney-Vento. On the

front of the COE there is a checkbox to indicate that a student qualifies for McKinney-Vento. All C.O.L.s should ask the parents of students the following:

Do any of these situations describe your current living situation?

Selecting one of the options below does not automatically make one eligible for protection under the McKinney-Vento Act. A McKinney-Vento liaison will contact you to provide further assistance.

- i. Shelter or transitional housing
- ii. Doubled-up (living with other persons for economic reasons)
- iii. Unsheltered (cars, parks, campgrounds, abandoned buildings or substandard housing)
- iv. Hotels or motels due to lack of alternative adequate accommodations
- v. None of the above

The Electronic COE

Since June 1, 2020, the Electronic Certificate of Eligibility (ECOE) has been used by the ID&R staff for all COEs unless there is an error in the electronic system or the C.O.L.'s computer/tablet is found to be unusable. If a paper COE is needed, the C.O.L. should follow protocols to submit the paper COE on Google Drive and alert their supervisor.

The switch from paper COEs to primarily Electronic COEs has been a success for Tennessee MEP. The ECOE has reduced the time it takes for a student to appear on the student list from two weeks down to two hours. Electronic COEs have also improved communication between the Data and Compliance Coordinator, the Statewide ID&R Manager, and C.O.L.s because data and COEs can now be shared much more easily between team members.

Electronic COE Work Flow

Where does the ECOE Go?



For complete instructions on filling out Electronic COEs, see the *TN ECOE Manual* on the Google Team Drive in the ID&R Documents Folder.

The Community Outreach Liaison Recruiting Log

The key tool that the Statewide ID&R Manager has in assessing the work of C.O.L.s is the Recruiting Log stored on the Google Team Drive. Every C.O.L. has their own Recruiting Log that they fill out after every work day. All C.O.L.s are required to keep notes when they are working, whether they are out in the field or in the office, so they can properly report on their experiences and not miss any details that need to be followed up on. The Recruiting Log is a Google Sheets spreadsheet that helps C.O.L.s stay organized and collects all work done by the C.O.L.s, including office work, creating recruiting plans, following up on Occupational Surveys, and various activities performed in the field. After the C.O.L. fills out the Recruiting Log, the Recruiting Log automatically gathers the information and highlights how many hours per month each C.O.L. spent performing each recruiting activity, how many COEs were completed, how many different locations were visited by the C.O.L. and how many eligibility interviews were conducted. Furthermore, all information collected from the individual C.O.L. Recruiting Logs is congregated into a statewide Recruiting Log so that the Statewide Manager can see collective data points from the entire ID&R team.

The Recruiting Log allows the Statewide ID&R Manager to monitor exactly how C.O.L.s are spending their time and resources and provides numerous data points to help evaluate program performance. The Statewide ID&R Manager uses the data collected from the Statewide Recruiting Log to help support a statewide contextual analysis. The Recruiting Log also improves C.O.L.s' performance by increasing transparency about what is expected of them and how they should be spending their time.

Monthly Mileage Reports

All MEP staff are required to log mileage driven each month to justify spending and program efforts. On the mileage log, MEP staff are required to list each address visited during a day out in the field, the date visited, miles traveled, and the reason for travel. C.O.L.s can list the mileage between each location or they can choose to list at the end of each day the total mileage traveled for the day. All Mileage logs are stored on each team member's Google Drive and are shared with supervisors at the end of each month for approval. Supervisors are required to approve mileage no later than the 5th of each month to ensure that mileage is paid on the 15th.

Chapter 5 - Professional Development

The Importance of Professional Development

The Migrant Education Program is constantly growing and evolving. The MEP has to adapt to frequent changes in agriculture and other societal factors that can impact migrant farmworkers and their families as well as stay up to date with federal regulations. It is important to establish a culture of learning within the program so that MEP staff are always trying to further their knowledge. Professional development is also a key part of TN MEP's quality control process, as well-trained C.O.Ls are more likely to have the information they need to make accurate eligibility decisions.

C.O.Ls are encouraged to read the National Office of Migrant Education's *Non-Regulatory Guidance* and OME's *National Identification and Recruitment Manual* to ensure the rules and regulations related to ID&R remain fresh. C.O.Ls are also encouraged to regularly research agricultural news in their areas, so they have up-to-date knowledge of what is happening inside their communities.

New Employee Training

All new C.O.Ls undergo thorough training covering all aspects of the Migrant Education Program, Conexión Américas, and Identification and Recruitment, a period of two weeks minimum where they shadow experienced C.O.Ls on the team, followed by a period where experienced C.O.Ls shadow the new C.O.L. to ensure they are ready to recruit in the field. If after two weeks of being shadowed, the new C.O.L. feels comfortable and the Statewide Identification and Recruitment Manager has approved, then they are ready to work independently in the field.

Tennessee MEP tries to hire new employees close to the summer months (when it is peak season) so that new C.O.Ls can participate in the annual ID&R "bootcamp." During this weeklong intensive training, the entire ID&R team joins together to review eligibility requirements, role-play scenarios, receive materials needed for the field, and engage in team-building activities.

On the Job Training

Regular Meetings with the Supervisor

The new recruiter will meet regularly (weekly) with the immediate supervisor to discuss child eligibility questions and other concerns that arise. A supervisor will provide regular feedback during weekly check-ins; however, it is equally important for the C.O.L. to ask for regular feedback on whether he or she is properly applying the child eligibility requirements. This is vital during the first few months on the job to prevent any misunderstandings from becoming ingrained.

Recruiter Support System

The new recruiter should develop a network of other recruiters locally, regionally, or even nationally with whom to share tips and discuss problems. Recruiting can be stressful work; it is important to create a safe learning environment in which the recruiter feels free to share experiences and to learn from successes and failures. The recruiter is encouraged to try promising new ID&R strategies and to share the results (both good and bad) with peers.

Source: OME *National Identification and Recruitment Manual*, p. 21

Community Outreach Liaison Evaluations

As part of the system of state quality controls, SEAs or LOAs are required to complete an annual review and evaluation of ID&R practices of individual recruiters [34 CFR § 200.89(d)(2)]. Every Spring, the TN MEP performs yearly evaluations in accordance with the Conexión Américas organizational calendar. The annual performance evaluations are conducted in such a manner as to invite the C.O.L.s to reflect on the past year, their performance, the challenges they faced and overcame, and to brainstorm about the ways in which they would like to grow professionally. These evaluations aim to provide constructive feedback and to celebrate the successes of the individual. All evaluations are conducted in private between the C.O.L. and their supervisor. The documentation and results of all annual evaluations are stored on the supervisor's private Google Drive folder to ensure it remains private.

Additionally, as part of the yearly evaluations, all C.O.L.s take the Identification and Recruitment Consortium's Recruiter assessment to ensure that staff are staying knowledgeable about the federal guidance.

Finally, as part of the evaluation process, the Statewide Identification Manager will shadow the C.O.L. two times during the year to assess the C.O.L.'s performance in the field.

Ongoing Professional Development Strategies

Professional development and learning does not stop for Community Outreach Liaisons after their initial training is complete. The TN MEP prioritizes ongoing professional development and encourages all staff to continue learning and growing. All C.O.L.s are encouraged to regularly read the *Non-Regulatory Guidance* and the OME *National Identification and Recruitment Manual* to ensure that their knowledge of the federal guidance remains sharp. Each week during the weekly team check-ins, the Statewide Identification and Recruitment Manager asks all C.O.L.s what they have learned during the week. Besides regular meetings, there are four distinct strategies that Tennessee MEP uses to ensure the Identification and Recruitment team continues to grow professionally:

Quarterly Trainings

One of the key objectives of Tennessee's ID&R Plan is that all ID&R staff will receive a minimum of four trainings throughout the year. These trainings are held quarterly but additional training can be offered as

opportunities arise and as the team's need demands. Quarterly trainings are given by the Statewide ID&R Manager or by outside partners or organizations like the MEP consortiums. Topics covered during the quarterly trainings will include MEP eligibility, best practices in the field, the latest agricultural news in the state, new technology tools for recruiting and much more. After each training has been completed, the training participants fill out a training evaluation form that is stored on the Google Team Drive. The training evaluation forms help the Statewide ID&R Manager evaluate the team's needs and assess the effectiveness of the training given.

Learning Through the Buddy System

As mentioned in the section on the "Buddy System" in Chapter 3 of the *Plan and Manual*, all Community Outreach Liaisons at least two times a year are given the opportunity to work in the field with another C.O.L. or an out-of-state recruiter if a group recruitment effort is being conducted. One of the best ways for a C.O.L. to learn new techniques is by watching the way other C.O.L.s perform in the field. Oftentimes, other C.O.L.s have different ways of introducing themselves, gaining trust with potential students and their families, or even asking eligibility questions, and C.O.L.s can learn from observing each other.

Practice Scenarios

The best way to put the federal eligibility regulations and guidelines to use is through practicing with hypothetical scenarios based on what other C.O.L.s have experienced in the field. Practice scenarios are an especially useful tool during the late fall and winter months, when not as many students are moving into the state and C.O.L.s are not conducting as many eligibility interviews. Practice scenarios help C.O.L.s brainstorm what they would do if they were ever to confront similar situations in the field and help to familiarize them with rarely-used rules regarding eligibility. Practice scenarios will be incorporated in Tennessee's ID&R trainings throughout the year.

National Conferences and Webinars

Along with internal trainings, Community Outreach Liaisons are given opportunities to participate in training webinars given by national organizations like the various consortiums or even other states. Depending on the availability of resources, C.O.L.s may also be given the opportunity to attend national conferences, where they can hear training presentations given by experts in ID&R and other subjects related to the Migrant Education Program (such as NADSME or ESCORT).

Chapter 6 - Quality Control

Why Quality Control is Important

Rigorous quality is applied to all components of Tennessee's ID&R process to ensure accountability and accuracy at every stage. Everyone who works in ID&R, including the C.O.L., Statewide ID&R Manager, and Associate Director are responsible for knowing the child eligibility requirements and ensuring quality control. OME states in the *Non-Regulatory Guidance* that every state should document its quality control procedures and that all quality control procedures should contain the following seven elements:

1. Training for ID&R Staff
2. Designated System to Verify Certificates of Eligibility and Child Eligibility
3. Process for Resolving Eligibility Questions from ID&R Staff
4. Ensuring Eligibility Determinations Were Made Correctly
5. Monitoring ID&R Practices of Community Outreach Liaisons
6. Documentation of Implementation of Quality Control Systems
7. Process for Implementing Corrective Action When Needed

Source: OME *National Identification and Recruitment Manual*, p. 131

The Tennessee MEP's ID&R Quality Control process is as follows:

Training for Identification and Recruitment Staff

As mentioned in the section on Professional Development, the Tennessee MEP takes the training and growth of its staff very seriously. Tennessee MEP aims for ID&R staff to attend a minimum of four trainings annually, as well as attending virtual trainings hosted by the Identification and Recruitment Consortium, National ID&R conferences, and by working alongside ID&R staff from other regions so they may learn by seeing how others conduct eligibility interviews. All new ID&R staff will receive an onboarding training.

Designated System to Verify COEs and Child Eligibility

The Tennessee MEP has a clear review system to verify all new COEs.

1. When a COE is filled out, whether in paper or electronic form, the Community Outreach Liaison has 24 hours to submit the COE to the Statewide ID&R Manager.
2. Once the COE has been submitted, the C.O.L. sends an email to the Statewide ID&R Manager and the Data and Compliance Coordinator.
3. The Statewide ID&R Manager does the initial screening of all COEs. If an error is found, or if more information needs to be collected, the COE is returned to the C.O.L. via a secure server with an e-

mail explaining why the COE is being returned and how the COE should be corrected. In the Electronic COE system if a COE is rejected, the Statewide ID&R Manager sends an e-mail to the C.O.L. and also writes in the ECOE log why the ECOE is being returned and how it needs to be corrected.

4. After the Statewide ID&R Manager completes the initial review of COEs and any necessary corrections are made by the C.O.L., the COEs are reviewed by the Data and Compliance Coordinator, who serves as the designated SEA reviewer for all COEs. The Data and Compliance Coordinator issues the final approval and signature for all COEs.

Process for Resolving Eligibility Questions from ID&R Staff

As mentioned in the section "When to Ask Questions: Determining Eligibility in Difficult Situations" in Chapter 3 of this *Plan and Manual*, the Tennessee MEP follows the model for eligibility questions outlined by OME in the *National Identification and Recruitment Manual*.

1. When a Community Outreach Liaison has a question about eligibility, they must first refer back to the *Non-Regulatory Guidance* to see if that document can answer their question.
2. If they are unable to find their answer in the *Guidance*, the C.O.L. must contact the Statewide ID&R Manager and/or the Data and Compliance Coordinator.
3. If the Statewide ID&R Manager is unable to answer the question, they should ask their contacts in similar positions around the country.
4. When a formal inquiry needs to be made to OME because an answer cannot be found or the situation is unclear, the Statewide ID&R Manager goes to the Associate Director, who will work with the State Director in the Tennessee Department of Education to send a formal request to OME. Only the State Director in the Tennessee Department of Education is to reach out to OME about doubts expressed by the ID&R staff.
5. When answers are obtained from OME, they are stored on the Google Team Drive to be saved for future reference and to be used as training materials.

Ensuring Eligibility Determinations Were Made Correctly

The Tennessee MEP performs annual internal re-interviews according to federal regulations to ensure that the ID&R staff are making correct eligibility decisions. (For further information on how Tennessee MEP conducts their re-interviews, see the section "Annual Re-interviews" later on in this chapter.) The Tennessee MEP includes the target re-interview error rate of 2% in their annual MPOs as a way of measuring the performance of the ID&R team. In 2018-2019 the Tennessee MEP contracted the ID&R Rapid Response Consortium (IRRC) to conduct the required independent re-interviews. After final analysis by IRRC members, a final error rate of 0% was reported.

Tennessee MEP also conducts two checks on a COE before it is approved. COEs are reviewed by the Statewide ID&R Manager, and then checked and approved by the Designated SEA reviewer, who in Tennessee is the Data and Compliance Coordinator. This two-leveled COE check helps ensure that COEs are carefully reviewed and that eligibility determinations were made correctly.

Monitoring ID&R Practices of Community Outreach Liaisons

Each year the Statewide ID&R Manager conducts annual performance evaluations of all Community Outreach Liaisons to reflect on their performance, evaluate what was effective, determine what could be improved, and brainstorm about other ways the ID&R team can use their knowledge and skills. As part of yearly evaluations, all C.O.L.s take the ID&R Consortium Recruiter Assessment. The Statewide ID&R Manager also aims to shadow all C.O.L.s in the field at least twice a year to ensure C.O.L.s are following best practices. After each C.O.L. is shadowed, a written evaluation is provided to give feedback on potential areas of growth. Besides the yearly evaluations, the Statewide ID&R Manager conducts weekly check-ins with ID&R staff and uses the Recruiting Log to track C.O.L. performance and monitor how C.O.L.s are using their time on a day-to-day basis. The Recruiting Log allows C.O.L.s to have a better understanding of what is expected of them and allows the Statewide ID&R Manager to make suggestions in real time about how C.O.L.s can improve their effectiveness in the field.

Documentation of Implementation of Quality Control Systems

Tennessee MEP uses a Google Team Drive and the MIS2000 Student Database to store program and student information. All student records are stored on the secure MIS2000 server, and staff can access and modify student data using the interface TNMigrant. In order to access the records, MEP staff need to obtain a login and password for TNMigrant from the Data and Compliance Coordinator. Physical copies of all COEs are securely stored in the MEP office. Staff information, documentation of work efforts including mileage reports and recruiting logs, documentation of trainings given, documentation of MPOs, documentation of re-interviews, and documentation of strategies and work plans are stored on the MEP Google Team Drive.

Process for Implementing Corrective Action When Needed

The Tennessee MEP follows the Conexión Américas Human Resources Policies & Guide Handbook as outlined in the Employee Handbook for when corrective action is needed for disciplinary reasons. If corrective action is required to improve work performance or improve the efficiency of the ID&R team, the Statewide ID&R Manager works alongside the Associate Director to draft a plan that clearly highlights what has not been working and then lists a step-by-step plan for implementing new strategies. If the situation needing corrective action is extensive enough, the Associate Director will forward the plan to the Conexión Américas Director and the MEP State Director at the Tennessee Department of Education for approval.

Annual Re-interviews

Required by regulations [34 CFR § 200.89(a)(2)], re-interviewing is the process of checking the eligibility determinations recorded on a state's COEs. It involves interviewing families and checking each criterion that makes children eligible for the MEP. Therefore, re-interviewing allows confirmation of Tennessee's eligibility determinations and the accuracy of the numbers of migratory children that Tennessee reports. It

also helps the TN MEP to identify and fix any problems in the ID&R process, and depending on the type of re-interviewing implemented, it can help to establish a discrepancy or defect rate for monitoring and funding purposes.

Source: OME *National Identification and Recruitment Manual*, p. 217

The National Office of Migrant Education (OME) has extensive regulations on how to perform re-interviews. States are typically expected to conduct re-interviews for 10% of all COEs produced during a performance period. For medium-sized states like Tennessee, OME has stated that a re-interview sample size of 50 is adequate to conduct a thorough re-interview. Re-interview regulations require that states determine an error rate of 2% or less. This means that upon conclusion of the interviews, only 2% or fewer COEs are determined to have been incorrectly declared eligible. (For a sample size of 50, this means that only 1 COE was incorrectly declared eligible.)

The re-interview process consists of drawing a random sample of all students enrolled in the MEP during the time in question (usually during a performance period, but re-interviews can also be done quarterly). The random sample is 2.5 times the original sample in order to create a replacement sample and account for non-response. The TN MEP uses the random sample report on MIS2000 to draw our random student sample. The random samples are then assigned to a C.O.L. who did not conduct the original re-interview. C.O.L.s are encouraged to visit the interviewees' homes to conduct re-interviews in person when possible. If after 3 attempts to visit the home for the re-interview the student or family is not able to be reached, the C.O.L. may attempt to conduct the re-interview by phone. If the student or family is still not reachable, the C.O.L. will document the contact attempts and replace the student on the list with a student from the replacement sample.

Once all re-interviews have been conducted, the Statewide ID&R Manager reviews the re-interview forms and original COEs to determine final eligibility. The Statewide ID&R Manager then drafts a final report listing the results, any potential sources of errors found, and practical steps to be taken to correct any errors. Any students who were erroneously declared eligible will be removed from the student list and the families contacted and informed that their eligibility has ended. The Statewide ID&R Manager will store the final report and analysis on the Google Team Drive in the Re-interview folder.

Steps for Conducting Tennessee's Internal Re-interview

- 1) The Statewide ID&R Manager will conduct a random sampling of students from MIS2000. The sampling will be divided into two lists (one list of students to call first and another list of replacement students in case those from the first list are unreachable).
- 2) The Statewide ID&R Manager will divide the list between the ID&R team, ensuring that C.O.L.s are not assigned to reinterview families that they personally recruited.
- 3) The re-interview process will be reviewed with the C.O.L.s.

- 4) C.O.L.s should conduct re-interviews in person whenever possible. If a C.O.L. visits a family twice, and is still unable to reach them, they are permitted to conduct the re-interview by phone. If a family is unable to be reached by telephone after three attempts, this family should be considered unreachable. If a family is marked as being unreachable, the C.O.L. will replace the family with another family assigned to them from the second sample list. If a C.O.L. calls a family three times, and is still unable to reach them, they are to mark the family as unreachable on the Re-interview form.
- 5) C.O.L.s will complete the **Re-interview form** and upload completed forms to Google Drive to the "Completed Re-interview Forms" folder.
- 6) C.O.L.s will use the **Re-interview Results Documentation Form** to document whom they were able to reach, the date the family was contacted, and any relevant notes.
- 7) If a family is marked as being unreachable, the C.O.L. will replace the family with another family assigned to them by the Statewide ID&R Manager from the second sample list.
- 8) If the necessary re-interviews cannot be completed, the Statewide ID&R Manager will work with the Data and Compliance Coordinator to pull additional samples for families to be reached.
- 9) If during the reinterview process multiple students from the same COE are randomly selected, only one of the student re-interviews from the COE will be counted towards final analysis. This is to maintain data fidelity and to ensure that the re-interview process provides as wide as possible a view of the ID&R system.
- 10) The Statewide ID&R Manager will review the uploaded Re-interview forms to ensure that they are complete and usable in the Re-interview process. In the case of missing information, the C.O.L. will be alerted so that they can re-contact the family to complete the form.
- 11) The Statewide ID&R Manager will review the approved Re-interview forms, comparing them to the original COE. The Statewide ID&R Manager will, based on the review, determine if the family qualifies for the program.
- 12) The Statewide ID&R Manager will document the results of the Re-interview process on the *Internal Student List and Final Analysis* document located on the Google Drive.
- 13) If, during the reinterview process, a discrepancy is found, there will be a chance for rebuttal. A second ID&R team member will contact the family in question and fill out a re-interview form. The State ID&R Manager will compare the forms and interview both team members about the re-interview in order to reach a decision.
- 14) A final written report of the results and recommendations of the internal prospective re-interview process will be completed after each quarterly round of re-interviews.
- 15) At the end of the performance period, the Internal Re-interview Results Documentation form and final written report and recommendations will be shared with the MEP team and TDOE.
- 16) The results of the re-interview will also be shared in the Consolidated State Performance Report (CSPR).

The MEP was previously required to conduct an outside independent re-interview every three years under the Every Student Succeeds Act (ESSA). However, according to updated 2019 regulations, states are now only required to perform one independent re-interview within three years of the passing or renewal of

relevant federal educational policy. ESSA was passed in 2017 and Tennessee MEP conducted its independent prospective re-interviews during the summer of 2019 for the 2018-2019 performance period. Tennessee MEP worked with the ID&R Rapid Response Consortium (IRRC) to conduct its independent re-interviews. C.O.L.s from Georgia, Iowa, and New York partnered with Tennessee C.O.L.s who had not conducted the original re-interviews. Will Messier of New York MEP and a panel from Iowa and South Carolina reviewed the re-interview forms and original COEs. After review, a 0% error rate was found. All COEs were found to have been issued correctly. IRRC issued a formal letter to Tennessee citing the 0% error rate.