


U.S. DEPARTMENT OF EDUCATION
OFFICE OF ELEMENTARY
AND SECONDARY EDUCATION



Technical Assistance Guide on Re-interviewing



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U.S. Department of Education
400 Maryland Avenue, S.W.
Washington, D.C. 20202-6135

This technical guide was produced under U.S. Department of Education Contract No. ED-04-CO-0024/0001 with JBS International, Inc. Staff from the Office of Migrant Education served as the contracting officer's representative. No official endorsement by the U.S. Department of Education of any product, commodity, service or enterprise mentioned in this publication is intended or should be inferred.

December 2010

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This technical guide is also available on the Department's Web site at:
<http://www.ed.gov/programs/mep/resources.html>

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Section I: Introduction

PURPOSE OF THIS TECHNICAL ASSISTANCE GUIDE

The overall aim of this guide is to help states develop, in accordance with the requirements described in Migrant Education Program (MEP) regulations, both prospective and retrospective re-interviewing processes that are efficient and effective and that provide useful, valid, and reliable information about state identification and recruitment (ID&R) processes. This guide provides a resource for state agency personnel to use during the various phases of re-interviewing. In this guide, you will find:

- ✓ A description of a step-by-step process to determine the type of re-interviewing your state needs and to develop your re-interview protocol;
- ✓ Approaches and tools to successfully implement a re-interviewing process according to your local information requirements, taking into account resource limitations;
- ✓ Advice on how to select a sample, manage and minimize non-response and missing respondents, select and train re-interviewers, and address other potential implementation challenges; and
- ✓ Tips on how to sample, monitor data collection, analyze the data, and use the re-interview results.






HOW TO USE THIS GUIDE

This guide is divided into five main sections. Begin by reading this Introduction and the How To Choose a Re-Interviewing Method sections (I & II). Once you select a type of re-interviewing method that is best for your state, go directly to the corresponding section (either Section III for Prospective or Section IV for Retrospective Re-interviewing). Each of these two sections covers all the topics you will need to consider for the specific type of re-interviewing and so some of the same information is repeated in both sections. When you have finished either one of these sections, you will be ready to start planning for the re-interviewing method. Section V includes Tools that will help you through the entire process of planning, implementing, and reporting your re-interviews. Throughout the guide, you will find icons that highlight particular kinds of information.

Tips for Using the Guide to Plan your State's Re-interview Process

- ✓ Read this introduction, including the Steps in the Re-interviewing Process, before moving on to Section II: How To.
- ✓ Read about how to Choose a Type of Re-interviewing in Section II to clarify the re-interview purpose, determine the re-interview timing, identify available resources, and decide whether you need to contract out your re-interview process.
- ✓ Use this guide while referring to the MEP (Title I, Part C of the Elementary and Secondary Education Act) non-regulatory guidance and regulations.
- ✓ Once you have chosen the type of re-interviewing (prospective or retrospective), read Section III or Section IV that explains that particular type of re-interviewing. (Note that the guide repeats information between Section III and Section IV so that you only need to read the one that relates to the method chosen.)
- ✓ If, at any point, you determine that you need to contract out your state's re-interview process, (or a substantial part of it), ask your consultant to read this guide too.
- ✓ Remember to include an appeals process (Tool 14, page 104).
- ✓ Tools to help with almost every step are available in Section V: Tools.

Information Icons

 Jump Start	Jump Start icons identify tips and tools to help you start immediately when you are already familiar with the topic area. If you are unfamiliar with the material, read the full description first. Then, revisit the Jump Start section.
 Standards	Standards icons identify criteria that help you ensure that your state's re-interviewing process meets accepted statistical and methodological standards for reliable and valid data.
 Reflection	Reflection icons provide opportunities to think about and make note of what you have learned and decided.
 Bright Idea	Bright Idea icons identify suggestions based on ideas supplied by state Migrant Education Program staff and Office of Migrant Education (OME) specialists.
 Consider This	Consider This icons identify suggestions related to planning, adapting, and reviewing specific skills or tools. These can help you customize your state's re-interviewing process to meet your specific needs.

TWO TYPES OF RE-INTERVIEWING: PROSPECTIVE AND RETROSPECTIVE

What Is Re-interviewing?

Re-interviewing is the process of checking the eligibility determinations recorded on your state's Certificates of Eligibility (COEs). It involves independently interviewing families and checking each criterion that makes children eligible for the MEP. States can use prospective re-interviewing for quality control before submission of annual child counts. Like quality control processes in a factory, prospective re-interviewing is a process that allows problems to be identified early and to know when steps are needed to correct them. Together these types of re-interviewing can form a key part of a state's monitoring framework

Purpose of the Re-interview

Re-interviewing allows confirmation of your state's eligibility determinations and the accuracy of the numbers of migrant children that your state reports. It also helps to identify and fix any problems in your state's 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. Discrepancy rates are calculated from your prospective re-interviewing data, while defect rates are calculated during retrospective re-interviewing.

Prospective Re-interviewing

Prospective re-interviewing is a process that allows for the identification of problems early on so they can be quickly corrected. Prospective re-interviewing is:

- ✓ Completed before your state submits child counts every year;
- ✓ Conducted at least once every three years by an independent reviewer;
- ✓ Performed on the current year's identified migrant children;
- ✓ Implemented, ideally, on a rolling basis and as soon as possible after recruiters complete COEs;
- ✓ Representative of all determinations made in your state for the year, although it may also focus on areas you anticipate will have problems (e.g., specific training practices, geographic areas, or seasons); and
- ✓ Designed to provide an early warning of problems that exist or may develop with the eligibility determination process so that you can take action to find and fix them.
- ✓ Can be used to determine a discrepancy rate.

Bright Idea

By building prospective re-interviewing into your regular schedule of activities, you will make your process as efficient and effective as possible. Use existing knowledge of your state's population to implement the process when migrants are available, preferably as soon after their initial enrollment as possible. The sooner the prospective re-interviewing is scheduled, the faster you can identify and fix potential problems. This will make it less likely that you will have to conduct retrospective re-interviews in the future.

Prospective re-interviewing is a low-cost and low-burden early warning system that can alert you to whether problems are developing in your state's ID&R processes. In some situations, particularly when problems are anticipated, your state may want to do more than minimal prospective re-interviewing. You can enhance your state's prospective re-interviewing by examining the impacts of new training practices or ID&R issues specific to certain geographic regions or agricultural seasons. The prospective re-interviewing section in this guide will cover when and how you may want to do this.

Retrospective Re-interviewing

Retrospective re-interviewing establishes valid and reliable defect rates that measure the quality of a state's eligibility determinations for an entire child count year (i.e., eligibility determinations made over the course of a three year period). Retrospective re-interviewing serves a purpose similar to a manufacturer's product recall when a serious defect is suspected. Using this information, a state can determine the accuracy of a prior year's child count and, if necessary, revise downward its previously submitted child counts.

Retrospective re-interviewing is:

- ✓ Undertaken when your state (or OME) suspect a problem is affecting your state's child identification or when your state needs to establish a defect rate;
- ✓ Performed on a prior year's eligible children (whose numbers have already been reported);
- ✓ Representative of all eligible children from the designated year;
- ✓ Designed to establish a reliable and valid defect rate and to identify the reasons for defects in eligibility determinations; and
- ✓ Capable of directly influencing your state's funding allocations.

CREATING A PROCESS THAT IS CLIENT FRIENDLY

The success of a re-interview effort depends on gaining the cooperation of migrant families because their perception of the process will affect the outcome. It is important not to make the re-interview process intimidating for families or to make families feel that their truthfulness is in question.

Determine the purpose for doing the re-interviews, and prepare an explanation for the families. For example, you might be checking on interviewers, determining whether the state's ID&R training works as desired, or trying to learn about how to best implement the eligibility interview process.

Most migrant families are very polite and cooperative, but they may try to give the interviewer the information they think he or she wants rather than provide information about what is actually going on. They may also feel loyal to the initial recruiter and not want to get that recruiter "in trouble". Families may worry that they may also "get in trouble" (e.g., lose benefits for their children).

Work with families' desire to be cooperative and polite. Remember that re-interviewing families is an opportunity to fine-tune your state's ID&R process. You might want to take a broader view of the re-interview by letting participating families know that you are trying to improve the eligibility interview process and want their help. This takes the focus off the initial recruiter and the migrant family and makes the re-interview easier for families.

Families can also be prepared for a re-interview at the initial recruitment interview. Recruiters might tell the family that they may be asked to participate in a second interview, and explain why. Ask for the family's help with the re-interview process, and leave an information page in the primary language of the parents to remind them they may be chosen for a second interview. Include the logo and contact information of your office (or the organization that will be conducting the second interview) on the information page as well.

Determine the consequences for families who participate, and establish ethical, informed consent by explaining these consequences to the families. At the beginning of the process, clearly inform families that they may lose services because of their answers. Let families know there is an appeals process and explain the appeals process to them.

Reflection

What worries do you think your state's families may experience about the re-interview? What are the potential consequences of participating in the re-interview that you need to let them know about? What circumstances in your state or local area may affect your families' willingness to participate in the re-interviews? How can you help them feel more comfortable with this process?

APPLYING CRITERIA AND STANDARDS TO RE-INTERVIEWING

Standards

Throughout this guide, you will find standards and criteria to ensure that your state's re-interviewing process meets what OME considers to be acceptable statistical and methodological standards for reliable and valid data. These standards cover the five main parts of the re-interview process: 1) sampling, 2) obtaining data from families, 3) ensuring re-interviewer independence and skills, 4) making eligibility determinations, and 5) calculating and using a defect or discrepancy rate. For more information on sampling and interviewing techniques, selected references are provided at the end of Tool 1, on page 78 of this guide.

The criteria for valid and reliable re-interviewing apply to both prospective and retrospective re-interviewing. There are a few key differences to consider, however, as these standards are applied, especially regarding sampling and data collection.

Considerations for Prospective Re-interviews

In a prospective re-interview process, the goal is to obtain an early warning if problems are developing in your state's ID&R processes. OME considers that only a small sample of re-interviews, typically about 50, should be sufficient for this purpose. In some cases, your state may want to do more.

To limit non-response, states should perform prospective re-interviews relatively soon after the original interview during the annual performance period. This will help minimize interruptions to students and families and ensure child counts can be updated before they are sent to OME. This will also increase the chances that families will be around for the follow-up. Face-to-face re-interviews should be conducted where feasible. And, although face-to-face interviews are the most reliable, MEP regulations §200.89(b) permit alternative methods, such as telephone interviews, in circumstances where face-to-face interviews are impractical.

To ensure high-quality re-interviews, interviewers should be independent of the original eligibility determination. Use of independent re-interviewers allows for greater transparency and collection of program eligibility data. For prospective re-interviewing, existing program personnel and recruiters are allowed to be used for two out of every three years. To the extent existing recruiters are used, ensure that the recruiters do not re-interview the families they originally recruited for the MEP. At least once every three years, independent re-interviewers who have been carefully trained in the re-interview process must be used. These re-interviewers should not be State educational agency (SEA) or local operating agency staff members working to administer or operate the MEP, nor any other persons who worked on the initial eligibility determinations being tested.

Since the purpose of prospective- interviews is not to calculate a defect rate, the number of re-interviews to be done is likely to be much smaller than that needed for calculating a defect rate. (Note, OME anticipates that the

sample size for each year's prospective re-interviews will average 50 per state.) Instead, the prospective re-interviews will provide information on *discrepancies*, in the sample of eligibility determinations to be tested, between your state's original eligibility determinations and the findings from the re-interviews. Your state will need to examine this information to uncover any problems that may be developing, and to plan any next steps that are needed.

Section III, page 11, provides further guidance concerning prospective re-interviews.

Considerations for Retrospective Re-interviews

In a retrospective re-interview process, calculating a reliable statewide defect rate must be the primary consideration. Retrospective re-interview data collection should match the original interview methods whenever possible.

MEP regulations require the defect rate to have a confidence level of 95 percent and a confidence interval of +/- 5 percent. This means that, 95 times out of 100, the state's "actual" defect rate will be no more than 5 percentage points higher or lower than the sample's defect rate. "Actual rate" means the rate you would find if you re-interviewed, without errors, every member of your population with an eligibility determination. You can never truly know exactly what your "actual" rate is, because your population is constantly changing and your sample size will be less than the population size. Both prospective and retrospective re-interviewing can give you an *estimate* of what your "actual" rate is.

If you have information on the size of the expected defect rate (e.g. a previous rate or information from your state's ID&R system), this information can be used in determining the sample size. This is because the number of re-interviews needed to obtain the desired confidence level depends largely on how extreme your state's actual defect rate is. Very low or very high defect rates need very few re-interviews to confirm. For example, to confirm that a defect rate of 50 percent still exists, a larger number of re-interviews is necessary. To confirm a defect rate of two percent at the desired confidence level of 95 percent, a sample size of just 30 re-interviews is sufficient; however, to confirm that a defect rate of 48 percent still exists, 384 re-interviews are necessary.

If the defect rate is unknown (i.e., there is no prior information about the defect rate), it is best to go with a random sample of 384 interviews.

The size of your state's population makes only a small difference in the number of interviews needed. A state with a defect rate of 12 percent and 500,000 children would need to conduct 162 re-interviews, whereas a state with the same rate and a population of 1,000 would still require 140 re-interviews. In addition, keep in mind that you will need to arrange for independent reviewers for this process.

One of the difficulties that states may face in the retrospective re-interviewing process is the intricacies involved in finding families. States may need to carry out such a process for months, or even years, after the original interview. Families who have moved out of the district, or even out of the state, may need to be located if you want to determine whether families who have moved were qualified. This effort can become more difficult as time passes. Excluding families in the sample who move, however, will likely increase your state's defect rate. If it proves impossible to find these families, consider adjusting for non-response (see page 54).

All this said, retrospective re-interviewing would only be necessary in certain circumstances: when your state (or OME) suspects a problem is affecting the state's child identification or when the state wishes to establish a new defect rate. The requirements for retrospective re-interviewing are contained in § 200.89(b) of the Title I regulations published July 29, 2008 in the Federal Register. A copy of these regulations is included as Appendix B for your reference.

Section IV, page 46, provides further guidance concerning retrospective re-interviews.

STEPS IN THE RE-INTERVIEWING PROCESS

Performing prospective and retrospective re-interviewing in a systematic way makes your state's re-interview process easier and more cost effective. The pyramid diagram below shows 12 steps that will help to ensure that your state's re-interview process goes smoothly. If you begin with a strong foundation, sharing information and planning systematically, time and money will be saved on later steps, and better information will be obtained from the re-interviews. This guide provides information on how to carry out steps 2 through 11 of this pyramid diagram.



Section II:

How to Choose a Re-Interview Method

This section describes in detail how to perform each step in the re-interview process: how to choose a type of re-interview, how to plan and carry out prospective re-interviewing, and how to plan and carry out retrospective re-interviewing.

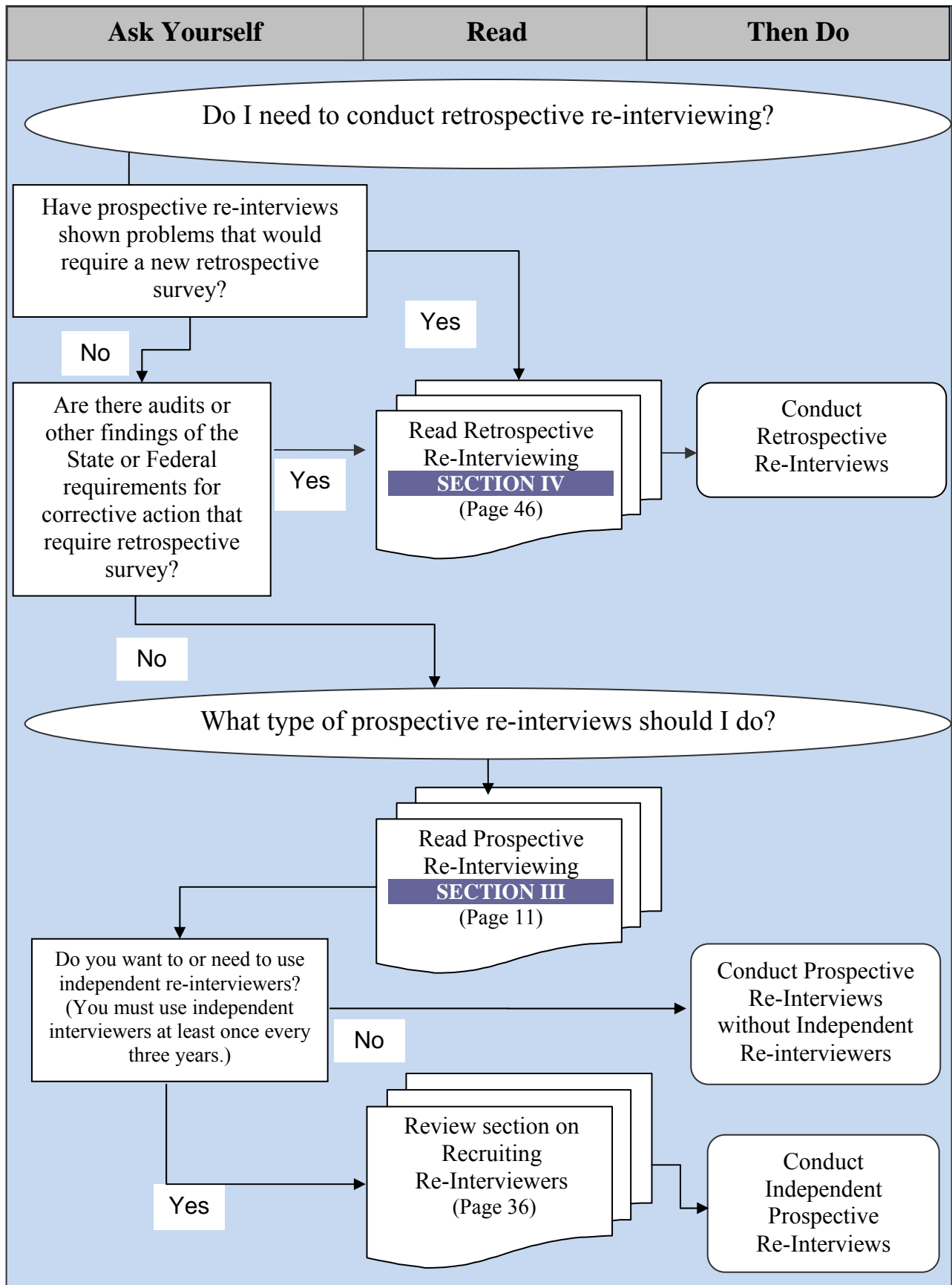
CHOOSE A TYPE OF RE-INTERVIEWING

You should consider a few things about your state's information needs and organization to determine whether to do prospective or retrospective re-interviewing. Remember, states are required to conduct prospective re-interviewing annually. Retrospective re-interviewing is only necessary when your state or OME suspect a problem is affecting the state's child identification. This guide provides a section for each type of re-interviewing along with advice on how to implement each one successfully (Sections III & IV).

The answers to the following questions will help determine which type of re-interviewing best suits your state's needs.

1. Do you want to know what is happening now or what has happened in past years?
 - ☐ If you want to know what is happening now, use *prospective* re-interviewing.
 - ☐ If you need to document a snapshot of time from the past, use *retrospective* re-interviewing.
2. Are you concerned about the accuracy of your state's child count numbers?
 - ☐ If you want to identify sources of problems in your state's child counts before they are submitted, use *prospective* re-interviewing.
 - ☐ If there is a concern that you have eligibility determination errors in numbers you have already submitted, use *retrospective* re-interviewing.
3. What are your state's resource constraints?
 - ☐ If your state's resources are limited, *prospective* re-interviewing can save money and personnel resources by allowing approaches such as phone interviewing and small samples and fix problems before they become widespread.
 - ☐ *Retrospective* re-interviewing tends to be expensive because interviewers usually conduct face-to-face interviews and because families may need to be located who have moved or who provided little contact information. Retrospective re-interviewing is usually conducted when it is required, and therefore, concerns about the use of resources must be secondary.
4. What are your state's time constraints?
 - ☐ Prospective re-interviewing saves time because it can be done with small samples.
 - ☐ If your state is required to conduct retrospective re-interviewing, then time is not the primary consideration.
5. What plans does your state have in place?
 - ☐ If your state does not already perform prospective re-interviewing as part of a quality control process or you are unhappy with how your state's prospective re-interviewing is implemented, you may wish to read the section on how to Plan and Implement Prospective Re-interviews.
 - ☐ If you have good prospective re-interviewing in place, but given the results, you need to plan a retrospective re-interview, read the section on how to Plan and Implement your state's Retrospective Re-interviewing.

Consider the answers to these questions, and then select the section of this guide to read next. The guide discusses *prospective* re-interviews in Section III and *retrospective* re-interviews in Section IV. Section V contains useful tools for both types of re-interviews. Additionally, the chart on the following page can serve as a guide in considering what steps you need to take. A copy of 34 CFR 200.89(b) from the Federal Register is provided in Appendix B.



Section III: Plan & Implement Prospective Re-interviews

Jump Start

The following information will help you carefully plan a process for successful prospective re-interviewing. This section provides information about each step in the re-interview process. You will also find tools and sample materials in the Tools section.

This section of the guide will prepare you to:

- ✓ Identify the type of re-interview sampling;
- ✓ Identify your state's sampling needs so you can discuss them with your statistician;
- ✓ Develop a re-interview guide;
- ✓ Develop re-interview monitoring tools;
- ✓ Select re-interviewers;
- ✓ Train re-interviewers;
- ✓ Monitor your re-interviewing process and the information collected;
- ✓ Document your state's eligibility re-determinations; and
- ✓ Report and use the results of your state's re-interviews.

Identify Your Sampling Approach for Prospective Re-interviews

Jump Start

Identifying and drawing a sample thoughtfully will ensure that it meets your state's information needs. The type of information needed, the type of sampling design chosen, and the difficulties anticipated in getting a response will all affect the size of the sample you will need.

The following will help you decide how to get started:

- ✓ Review the standards that apply to sampling;
- ✓ Determine the purpose of your state's current re-interviews; and
- ✓ Collect information on eligibility discrepancies or known retrospective defect rates from previous re-interviews.

Standards

Before planning the re-interviews, become familiar with the standards for the sampling process. Table 1 on the next page lists the six standards for sampling that apply to prospective re-interviewing. The following section will tell you how to meet these standards.

Table 1. Sampling Criteria and Standards

Criterion	Acceptable Standard
Sampling universe is complete.	The state has a structured approach to generating and checking the sampling list, and the sampling universe list contains at least 99 percent of the migrant children enrolled.
Eligible children are sampled randomly.	All eligible children in the sampling list have a known, non-zero probability of being drawn that is independent of the selection of others.
Planned sample is of adequate size.	For prospective re-interviewing, the sample size is sufficient to provide an early warning of problems that may be developing. On average, this will typically be 50 re-interviews.
Sampling plan is followed.	The state follows the sampling plan, with minor exceptions.
Sampling bias is addressed.	The sample pulled represents the entire universe.
Sampling replacement is systematic.	The initial sampling plan addresses issues of obtaining an adequate response rate from this difficult-to-survey population and has a systematic approach to replacement that ensures there is a known, non-zero probability for each person sampled.

Identify the Purpose, Timing, and Previous Experiences of Your Prospective Re-interviewing

The goal of prospective re-interviewing is to provide a cost-effective early warning of problems in your state's ID&R processes. The power of prospective re-interviewing is in assessing the accuracy of your state's ID&R process in a timely way and providing the information needed to monitor and improve those processes.

Many states have experience with conducting retrospective re-interviewing. Although some parts of prospective re-interviewing are similar, it is important to recognize the distinct purpose of prospective interviews. **The design of these prospective re-interviews will be somewhat different from that of your previous retrospective efforts.**

The MEP regulations for prospective re-interviewing require that states carry out and report the results of their prospective re-interviewing annually. Each state recruiter should have a chance that at least one of the COEs he or she completed be selected for re-interviewing each year (i.e., the sampling approach cannot intentionally exclude any recruiter). Once every three years, states must use independent re-interviewers to perform their prospective re-interviewing.

OME has designed an approach that allows states to complete a simple monitoring process that provides an indicator of whether the state has a quality child count. By using sampling, a small section from the universe of all children in your state's program can be reviewed, saving time and money. OME anticipates that the sample size for each year's prospective re-interviews will average 50 per state. States with very small migrant populations may possibly sample even fewer than 50. In addition, although OME expects states to conduct face-to-face re-interviewing, there may be a few impractical circumstances that lead states to consider phone interviews.

If your state's allocation is very small and its most recent known discrepancy rate is very low, fewer than 50 interviews may be acceptable. Check with OME if you think your state falls in this category.



Bright Idea

Read the latest regulations to make sure that your state is meeting all the current requirements for prospective re-interviewing. See the appendix for the current regulations.

What Can 50 Re-interviews Tell You?

It is important to understand that the information obtained from the prospective re-interview process is limited. For many states, this process will be sufficient. However, some states may want or need to conduct more in-depth monitoring. Before designing the prospective re-interview process, consider the type of information that will result from 50 interviews and whether that is sufficient for your state's needs.

The information resulting from 50 interviews depends on your state's actual prospective discrepancy rate. In general, 50 interviews can indicate whether your state's rate of discrepancies is likely to be less than five percent or it may provide enough ineligible cases to identify the types of errors recruiters are making. It is unlikely to tell you both. This is because the lower your state's discrepancy rate, the fewer ineligible re-interviews you find. Your state will fall into one of several situations depending on your state's discrepancy rate:

If your state has a low actual discrepancy rate of five percent or less, it can be known with some certainty whether your state's rate is still five percent or less. However, there will not be enough errors to uncover or address the causes of any problems that exist. A state with a five percent rate would likely find two or three errors in a sample of 50. If your state's most recent known defect or discrepancy rate was five percent and your state finds three or fewer errors, you can be confident that your state's actual rate is between 0 and 11 percent. (See Table 2 on the next page.)

Even if your state finds only two or three errors, you should continue to provide training and to improve documentation in order to achieve a rate as close to zero as possible. Your state may also wish to consider doing more than 50 re-interviews to find enough errors to help you make targeted improvements.



Bright Idea

If you complete 73 re-interviews and find fewer than four eligibility determination errors, you can be 95% confident that your state's rate of errors is between zero and five percent.

If your state has an actual discrepancy rate between five and 20 percent, a sample of 50 will confirm that the state's rate is likely more than five percent but you will not know much more about the discrepancies. For example, if there are seven or eight errors in a sample size of 50 (14–16 percent), the actual discrepancy rate could range from 5.5 to 25.5 percent. At the same time, you probably will find too few errors to learn much about how to solve problems. A state with a 10 percent known discrepancy rate would expect to find 5 errors, and a state with a 20 percent rate would likely find 10 errors.

If there are far fewer errors than expected, it is likely that the rate of discrepancies is not increasing. Examine the errors that are found to uncover patterns of problems that can be addressed through training or improving documentation. If there are several more errors than expected in the sample of 50, or the expected number of errors is found but there is no apparent pattern to them, you may want to carry out additional interviews to determine the extent and causes of the problem.

If your state has an actual discrepancy rate greater than 20 percent, enough errors may be found in the sample of 50 to identify some patterns in the errors. A state with a known retrospective defect rate of 30 percent would expect to find 15 errors. Likewise, if most of the errors are similar, a pattern will be noticeable. However, if the types of errors vary considerably, it will not be apparent what types of errors are most likely to occur.

Table 2 on the next page shows the number of errors expected, and the range in which the actual discrepancy rate falls for a sample size of 50. Note that unless the actual discrepancy rate is 5 percent or lower, a sample of 50 is not useful in determining or confirming the actual rate.

Table 2. Expected Errors and Confidence Intervals for 50 Re-interviews

If your actual* discrepancy rate is:	The number of determination errors you can expect to find is:	If you find this number of errors, your confidence interval is:	If you find this number of errors, you can say with 95% confidence that your rate is between:
1%	0–1	+/-3%	0 and 4%
5%	2–3	+/-6%	0 and 11%
10%	5	+/-8%	2 and 18%
15%	7–8	+/-10%	5 and 25%
20%	10	+/-11%	9 and 31%
30%	15	+/-13%	17 and 43%
50%	25	+/-14%	36 and 64%

* “Actual” means the rate you would find if you re-interviewed, without errors, everyone in your state with an eligibility determination. You can never truly know exactly what your “actual” rate is, since your population is constantly changing and your sample size is less than the population size.

After reviewing the information you are likely to obtain from 50 prospective re-interviews, it is time to reflect on your goals for prospective re-interviewing.



Reflection

Before reading further and before consulting a statistician, you will want to answer the following questions and use the sampling tool (Tool 2 on page 81 of the Tools section). The answers to these questions will help you decide whether a simple statewide sample of 50 re-interviews will meet your state’s needs, or whether you need to use a larger sample or a more complex sample design.

Known Information

Is your known, most recent, retrospective defect or prospective discrepancy rate:

- A. ☐ Less than or equal to 5 percent?
- B. ☐ Greater than 5 percent or unknown?

If your state already does prospective re-interviewing, what was the response rate (i.e., number of families in the sample that you re-interviewed) for the most recent round of prospective re-interviewing?

Purpose

Do you want a simple measure of whether the rate of errors is less than 5 percent?

- A. ☐ Yes
- B. ☐ No

Groups

Are the fluctuations of migrant child enrollment during the year:

- A. ☐ The same for all areas of the state?
- B. ☐ Different depending on the region, county, or local educational agency (LOA)?

Are there other differences in the MEP that are relevant for your state's eligibility determination process or ID&R issues (e.g., different recruitment agencies or approaches in different parts of the state)?

- A. ☐ No
- B. ☐ Yes

Do you think there will be different problems getting re-interview responses for separate groups within your state?

- A. ☐ No
- B. ☐ Yes

Do you think that any problems in your state's ID&R processes will be:

- A. ☐ Similar for all areas and groups within the state?
- B. ☐ Different depending on the region, season, recruitment agency, or other group within the state?

Does your state want to gather information about program components such as individual recruiters or each LOA?

- A. ☐ No
- B. ☐ Yes

Does your state want to report results by subgroup?

- A. ☐ No
- B. ☐ Yes

Does your state want to make sure one COE from each recruiter is sampled?

- A. ☐ No, it is okay that each recruiter has a chance of being selected.
- B. ☐ Yes, I want at least one COE from each recruiter.

Survey Resources

What method will your state use?

- A. ☐ Phone interview
- B. ☐ In-person interview

If your state is planning to do in-person interviews, are your re-interviewers spread throughout the state so that travel costs are not a concern?

- A. ☐ Yes
- B. ☐ No

If your state is doing in-person interviews, will you want to group interviews by location to reduce interviewer travel time and/or costs?

- A. ☐ No
- B. ☐ Yes

What are your state's financial resources?

- A. ☐ My state has a few resources, and I need something simple and inexpensive.
- B. ☐ My state is willing to spend a bit more on monitoring if it will provide more information about my state's situations.

Statistical Resources

What are your state's statistical resources?

- A. ☐ In-house without extensive survey experience
- B. ☐ Expert staff or consultants

Are your statistical experts knowledgeable about complex sampling problems, sampling weights, and analysis of data from complex samples?

- A. ☐ No
- B. ☐ Yes

Review your answers to the questions. If you answered A to all the questions, it is likely that a basic approach to prospective re-interviewing will meet your state's needs. If you answered A to the survey resource questions, your state may not have the financial or statistical resources to do anything more complicated. If you are uncertain about whether your state should use a more complicated process, consider starting with a basic approach. A **basic prospective re-interviewing approach** would use a statewide random sample of 50 migrant children to check for possible errors or developing problems. However, if you answered B to any of the questions and your state has the financial and statistical resources, you may want to consider enhanced prospective re-interviewing. **Enhanced prospective re-interviewing** would use a sample of more than 50 children and/or a sampling approach that allows differences in subgroups to be addressed within your state.

Knowing whether your state wants to do basic or enhanced prospective re-interviewing is important in designing the sampling plan. It affects the sampling universe or the type of sample selected.

Consider the following cases:

Case 1: A state has a known, recent discrepancy rate of three percent and confidence in its ID&R process. The state knows it would have to spend a lot of money and time to find enough ineligible cases to identify trends in recruiter errors. The state feels that it would be better off spending this money on recruiter training. In this case, the state decides to stick with a basic prospective re-interviewing process that uses a statewide random sample of 50 interviews. However, if in the future, the basic approach shows that the state's discrepancy rate is creeping up and appears to exceed five percent, the state would consider enhanced prospective re-interviewing that would allow it to check its rate and identify problem areas.

Case 2: Another state's recent re-interviews found a high discrepancy rate. The state implemented changes to its ID&R process and believes that the discrepancy rate has dropped. At the same time, the state is fairly sure the new rate is not yet below five percent. The state asks its statistician to design an enhanced prospective re-interviewing process with a sample that is large enough to help the state identify what areas to address next in improving its ID&R process. The state sees this as a temporary measure, and, when its discrepancy rate drops under five percent, it will switch to the basic approach.

Case 3: A state believes that its eligibility determination errors vary substantially among six recruiting regions. It is concerned that some regions with very few migrant children are responsible for many of the errors. A basic sample of 50 will not provide enough interviews to determine regional differences, so the state works with a sampling statistician to design an enhanced prospective re-interview process. The state wants its re-interviews to include all regions, with sufficient samples to uncover and fix current problems in small regions and checking for larger regions with lower error rates. Once it has found and addressed the problems, the state will switch its system to a basic, statewide sample of 50.

No matter which type of approach your state decides to use, a statistician will need to be consulted to ensure a correct sample. You can prepare for meetings with the statistician by sharing your answers to the questions above with him or her. Tools 1 and 2 (pages 78 and 81) in the Tools section will also prepare you to talk with a statistician.



Reflection

What kind of prospective re-interviewing will your state need to do?

☐ *Basic* approach to prospective re-interviewing. (Read Sample Design for Basic Prospective Re-interviewing on page 19.)

☐ *Enhanced* approach to prospective re-interviewing. (Read Sample Design for Enhanced Prospective Re-interviewing on page 22.)

Develop a Sample Design for BASIC Prospective Re-Interviewing

Identify Your Population: Define the Sampling Universe

The sampling universe for the re-interviewing is all migrant children to whom the results will apply. In most prospective re-interviewing cases, the sampling universe will be all migrant children, ages 3 through 21, who were recruited (i.e., whose eligibility was determined) for the MEP in your state during the current year. OME considers the “current year” to be the same as a child count year, September 1 through August 31, because it requires you to report the results of your prospective re-interviewing, along with your state’s child count, as part of your state’s annual Consolidated State Performance Report (CSPR) submission.

In determining the sampling universe, ask yourself, “What group(s) does my state need to know about?” In almost all cases, the sampling universe will be the list of children, ages 3 through 21, who were recruited (i.e., whose eligibility was determined) between September 1 and August 31 of the year associated with your state’s upcoming CSPR. For example, if your state’s next CSPR is due in December 2010, your sampling universe will be all children, ages 3 through 21, who were recruited between September 1, 2009 and August 31, 2010. The definition of who is included in your sample should match that used for your state’s child count, except that the sample should not include children whose eligibility was determined in prior years (i.e., prior to September 1, 2009 using the example above). These children might still be eligible for services, and therefore, reported as part of your state’s child count. But, unless they were again found eligible based on new qualifying move, they were not recruited between September 1 and August 31 of the current year and should not be included in your sample.

In some unusual cases, your state may want to restrict your sampling universe deliberately to certain regions or recruiters. For more information about this approach, read enhanced prospective re-interviewing on page 22.

Bright Idea

The easiest way to guarantee that the sampling universe is complete is to use the state’s migrant student data system to generate a list of students determined eligible during the current year (see the first paragraph on this page for what OME considers to be the “current year”). This approach may not be able to be used if the prospective re-interviews are done on a rolling basis shortly after recruiters complete the initial eligibility determinations. Instead, you may wish to define the state’s universe list as the COEs that have been submitted and are awaiting entry into the state’s migrant student data system.

Selection of a Random Sampling Method

If your state is using a basic approach to prospective re-interviewing, the choice of sample size and sampling choices is limited. A simple random sample or a systematic random sample can be used. These two types of samples and brief descriptions of how they might be drawn are explained later in this chapter. Depending on your comfort level and the in-house resources available, it may be best to consult with a statistician to assist in drawing the sample.

Sample Timing

The fact that the population size and location can vary from week to week often complicates the sampling process. However, for a basic approach to prospective re-interviewing your state will probably want to use a rolling sample.

A *rolling sample* is one where sampling and interviewing are done continuously throughout the year. A state might want to do a re-interview shortly after the initial interview with every 200th child enrolled in the MEP throughout the year (or 50 randomly selected numbers between one and the expected enrollment number). One big advantage of a rolling sample is that sampling is done close to enrollment, so non-response should be lower.

Also, there is no need to gear up for a large survey effort. A smaller year-round group of re-interviewers (or a single re-interviewer) can handle all the re-interviews along with other duties. The disadvantage is that travel costs might be higher for in-person interviews. However, this approach also works well with phone interviews. Because they occur shortly after the original interview, rolling samples can be very cost effective and easy to use.

Planning for Non-response

After considering your state's sample design and timing, another factor to take into account is non-response. Non-response occurs when someone on the sampling lists is unavailable or refuses to participate in the re-interview. Your state's sampling plan should take into account how many people are likely to refuse and how many may not be located.

Non-response affects the final size of the interview sample, and this in turn affects how useful the results are. Take all reasonable steps to reduce non-response. Tool 7 (page 89) in the Tools section includes a checklist of steps that reduce non-response. Also, consider the following suggestions:

- ✓ Make multiple attempts to contact sampled families. Three attempts are considered the minimum for in-person interviewing, but 10 attempts are more typical by phone.
- ✓ Implement prospective re-interviews as soon as possible after the original interviews. Use COEs from the most recent school year.
- ✓ Implement re-interviews when the respondents are likely to be home.
- ✓ Implement re-interviews when the migrant population is present in the area.
- ✓ Ensure that the re-interviewers have the language and cultural skills needed to make your state's respondents feel comfortable.

It is important to figure out how to get the sample size needed, even though there may be non-responses. For basic prospective re-interviewing, you will likely want to use *over sampling* to ensure there are enough responses. When over sampling, more people are deliberately included in the sample than are intended to be interviewed. This works well if you know what the non-response rate is likely to be. If a sample of 50 is needed and it is known from experience that about 10 percent of the sample chosen (5 people) will not respond, setting the sample size for 56 people should make it more likely that you will eventually get the 50 respondents needed.



Bright Idea

Plan for non-response when pulling the sample and carrying out the interviews to help ensure that enough information is collected to identify problems and next steps. For example, 50 re-interviews are needed during the prospective re-interviewing process and a sample of exactly 50 children is pulled. If only 40 children can be located, you will be less likely to find problems that exist and will know less about how to fix those problems. If this non-response is anticipated and accordingly, 63 children are selected during the sampling process, you can be ensured that there will ultimately be enough interviews to meet your state's needs.

WARNING: To avoid sampling bias, when over sampling, all the children selected generally need to be interviewed, even if the desired sample size is reached before all of the interviews are finished on the sampling list. This is particularly true when using a structured random sample.

Bright Idea

If you answered A to most of the items on pages 15 to 17 at the beginning of this section, a statewide random sample may be best for your state! Prospective re-interviewing should provide an early warning of problems that may exist or be developing at a statewide level. A systematic random sample carried out on a rolling basis as recruiters submit COEs can provide the information your state needs in a cost-effective way. You can make this more cost effective (particularly if your state is large, or your personnel resources small) by using phone re-interviews and contacting families for re-interviews soon after the initial interview.

If you know the approximate number of children your state anticipates enrolling (including annual re-enrollment based on new qualifying moves), you can use either a simple or a systematic random sample. For a simple random sample, let your statistician know the number of children you anticipate enrolling (e.g., 4,000). The statistician can draw a set of random numbers (e.g., between 1 and 4,000) that will identify which COEs (by order of enrollment) to re-interview.

To draw a systematic random sample, the sampling interval is determined by dividing the number of children anticipated to be enrolled by the number of re-interviews needed to be attempted to collect 50 responses. For example, if you anticipate enrolling/re-enrolling 4,000 children in the MEP, and you estimate that 80 percent of families can be found, then the interval at which to select children is $4,000/(50/0.8)=64$. You would then select the COE of every 64th child enrolled.

Use the smallest number of students anticipated to be enrolled and the highest reasonable estimate of non-response to ensure that a large enough sample is pulled.

If the basic approach to prospective re-interviewing described above meets your state's needs, you may wish to skip ahead to page 30, Prepare for Re-interviewing Data Collection. If you think you may need to do enhanced prospective re-interviewing, or if you want to know about other options, read about enhanced prospective re-interviewing next.

Develop a Sample Design for ENHANCED Prospective Re-Interviewing

Identify Your Population: Define the Sampling Universe

Usually, the sampling universe for re-interviewing is all migrant children to whom the results will apply. In most prospective re-interviewing cases, the sampling universe will be all migrant children, ages 3 through 21, who were recruited (i.e., whose eligibility was determined) for the MEP in your state during the current year. OME considers the “current year” to be the same as a child count year, September 1 through August 31, because it requires you to report the results of your prospective re-interviewing, along with your state’s child count, as part of your state’s annual CSPR submission.

In almost all cases, the sampling universe will be the children, ages 3 through 21, who were recruited (i.e., whose eligibility was determined) between September 1 and August 31 of the year associated with your state’s upcoming CSPR. For example, if your state’s next CSPR is due in December 2010, your sampling universe will be all children, ages 3 through 21, who were recruited between September 1, 2009 and August 31, 2010. The definition of who is included should match that used for your state’s child count, except that the sample should not include children whose eligibility was determined in prior years (i.e., prior to September 1, 2009 using the example above). These children might still be eligible for services, and therefore, reported as part of your state’s child count. But, unless they were again found eligible based on a new qualifying move, they were not recruited between September 1 and August 31 of the current year and should not be included in your sample.

In some unusual cases, your state may want to restrict your sampling universe deliberately to certain regions or recruiters. For example, if you know from the most recent retrospective re-interviews that quality control problems are concentrated in a few LOAs or that new recruiters are the source of most of the inaccurate eligibility decisions, your state might want to restrict the universe to just the children in those LOAs or those interviewed by new recruiters. If this is the case, make sure you understand the reasons and distribution of your state’s eligibility errors. Your state should not restrict the sampling universe to special cases for more than one year.

Warning: Restricting the sampling universe also restricts the information that can be obtained in the prospective re-interviewing. For example, if locations or recruiters are sampled with *known* problems, your state might be unable to spot any *emerging* problems until the next statewide re-interview cycle.

If saving money is a priority, your state may be tempted to restrict the universe to LOAs or recruiters who have had problems in the past. Instead of restricting the sampling universe, you can use a complex sample to concentrate most interviews among problem LOAs or recruiters, while still including a small number from other areas. This allows for the concentration of most of the resources on known problems but still devotes some resources to monitoring for emerging problems. Doing this requires consulting a sampling statistician familiar with complex samples.

Selection of a Random Sampling Method

The selection of the sampling method is often the hardest part of the sampling process, particularly if your state’s information needs are complex and resources are limited. Remember, in most cases, the sample size will still be small: from 50 to 100 children. This means that the sample should be kept as simple as possible. In



Bright Idea

The easiest way to guarantee that the sampling universe is complete is to use the state’s migrant student data system to generate a list of students determined eligible during the current year (see the first paragraph on this page for what OME considers to be the “current year”). This approach may not be able to be used if the prospective re-interviews are done on a rolling basis shortly after recruiters complete the initial eligibility determinations. Instead, you may wish to define the state’s universe list as the COEs that have been submitted and are awaiting entry into the state’s migrant student data system.

general, it is a good idea to consult with a sampling statistician who is familiar with the types of samples that your state will be using.

The type of sample that you select depends on the answers to the questions posed on pages 15 through 17. If you are reading this section, you may have answered B to one or more of the questions, and need to consider using a complex sampling approach and/or a larger sample size than 50.

The most frequently used types of samples include:

- ✓ Simple samples: **Simple** random samples and **systematic** random samples;
- ✓ Complex samples: **Stratified** sampling and **cluster** sampling; and
- ✓ **Self-weighting, probability proportional to size** (PPS) sampling. This complex sample functions like a simple sample.

Complex samples and PPS samples are often called *multistage samples*. This means that the sample is pulled in multiple steps based on the information available at each step. When you use complex sampling, the statistician must account for the different probabilities of being sampled in the different clusters or strata. They use sampling weights to ensure that the data from each sample member are counted correctly in the results. The method is complex, but the concept is similar to calculating a weighted average. There is a more detailed explanation of sampling weights in Tool 15 (page 105) of the Tools section. One disadvantage of sampling weights is that they can increase the standard deviation, which means that the sample has less precision than simpler samples. This means that you may also need to use larger samples when you stratify or cluster your sample.

Table 3 describes these common sample types and their respective advantages and disadvantages.

Table 3. Types of Sampling

Type	Methodology	Advantages	Disadvantages
Simple random	<ul style="list-style-type: none"> Draws members of the population completely at random (e.g., by assigning and selecting by randomly generated numbers). 	<ul style="list-style-type: none"> Generates information about the entire population. Often provides the most certainty for the sample size. Easy to analyze data. 	<ul style="list-style-type: none"> Cannot be certain that it represents all subgroups. May increase travel costs. Requires a complete universe list at the time the sample is drawn.
Systematic random	<ul style="list-style-type: none"> Draws members of the population using a designated interval (e.g., every third person). 	<ul style="list-style-type: none"> Generates information about your entire population. Often provides the most certainty for the sample size. Easy to analyze data. Using a sorted list can ensure that the sample represents large subgroups. 	<ul style="list-style-type: none"> Cannot be certain that the sample includes very small subgroups. May increase travel costs. Requires an up-to-date universe list at the time the sample is drawn.
Stratified	<ul style="list-style-type: none"> Separates the population into groups and draws separate random samples from each group (e.g., groups may be regions or counties). 	<ul style="list-style-type: none"> Generates information that represents all subgroups of the population. No need for a centralized universe list. Can limit the number of interviews in each location. 	<ul style="list-style-type: none"> Requires a statistician to design and draw the sample. May require experts to interpret the results. May require a larger sample size. May increase interviewing costs.
Cluster	<ul style="list-style-type: none"> This is a two or more stage sampling process that separates the population into groups and then draws the sample. A statistician draws a random sample at each stage (e.g., a sample of counties and a sample of children within each county). 	<ul style="list-style-type: none"> May limit travel costs by reducing the number of interviewing locations. No need for a centralized universe list. 	<ul style="list-style-type: none"> Requires a statistician to design and draw the sample. May require experts to interpret the results. May require a larger sample size. May increase interviewing costs. May not represent some subgroups if not evenly distributed in the state.
Self-weighting PPS	<ul style="list-style-type: none"> This is a two or more stage sampling process that selects both interviewing locations and children in proportion to their size in the entire population. 	<ul style="list-style-type: none"> Provides easy data analysis. No need for a centralized universe list. Can limit travel costs by reducing interviewing locations. Has the same lower sample size of a simple sample. 	<ul style="list-style-type: none"> May require statistical help to plan and draw the sample. Will result in doing most interviews in the largest groups. The sample may not represent small groups.

The Easy Samples: Simple Random Sampling and Systematic Random Sampling

Simple random sampling and *systematic random sampling* are the easiest samples to use. The statistical simplicity comes from the fact that in these types of random samples, every person has the same probability of being sampled—one chance in the total population. For example, if 1,000 children are in a state, each child has a 1-in-a-1,000 chance of being selected with these sampling methods.

For these two types of samples, the sampling universe usually consists of the entire child population, and the statistician randomly selects children from the list. In *systematic random sampling*, the statistician selects children in evenly spaced intervals (e.g., every 10th child). In *simple random sampling*, a statistician produces a list of random numbers (e.g., in an Excel spreadsheet) and selects the children on the list that correspond to the random numbers. For example, if the random number list was 54, 6, and 213, the sample would include the 54th, 6th, and 213th children on the list until all of the random numbers on the list had been used. (See Tool 5 on page 86 of the Tools section for a quick way to generate a random list of numbers.)

Although simple random and systematic random samples are easy to pull, these samples may not necessarily be the most efficient in terms of field operations. They may also involve higher travel costs if conducting in-person interviews.

WARNING: To use the easy samples, you must sample by child and count only the sampled child in the re-interview. Counting all children on a sampled COE, or first selecting a COE and then selecting a child from that COE, is considered a complex sampling method.

Consider This

Given the average sample size of 50 suggested for prospective re-interviewing, a statewide random sample will provide the best early warning of problems at a statewide level. If you think problems exist in specific subgroups in your state (e.g., new recruiters, specific geographic regions), a more complex sampling approach to target these groups may be more appropriate. However, a more complex sample will lose some ability to identify problems at the state level.

The Complex Samples: Stratified and Cluster Samples

A complex sample happens any time individuals have different chances of being sampled. In this case, that means that some children have higher chances of selection whereas others have lower chances. This is typically the result of including *clustering* or *stratification* in the sample design. Clustering separates the population into groups and draws separate random samples of each group. For example, a statistician randomly selects a subset of counties and then selects a sample from each selected county. Stratification separates the population into groups and draws a random sample within each group. Another example is dividing the state's child population into age groups and drawing a sample of children within each group.

When you use complex sampling, the statistician must account for the different probabilities of being sampled in the different clusters or strata. They use sampling weights to ensure that the data from each sample member are counted correctly in the results. The method is complex, but the concept is similar to calculating a weighted average. There is a more detailed explanation of sampling weights in Tool 15 (page 105) of the Tools section. One disadvantage of sampling weights is that they can increase the standard deviation, which means that the sample has less precision than simpler samples. This means that you may also need to use larger samples when you stratify or cluster your sample.

Remember that if the sample is clustered or stratified, the number of errors expected in the whole sample is divided among the clusters or strata. This means that larger samples may be needed to identify problems within the clusters or strata.

When working with complex samples, there are two decisions to make: first, selecting the structure of the design (e.g., stratified by county, clustered by interviewer), and second, allocating interviews to the components of the design. This guide first covers *types of designs* first and secondly, *ways to allocate interviews*.

Stratified Sampling: Stratified samples allow groups to be treated differently. States can use this method when they want to sample differently for different groups. In stratified samples, the sampling universe is divided into groups called *strata*. These groups could be age groups, counties, language groups, or other factors that are considered important to use in sampling. It is important that the groups include all the members of the sampling population.

There are several ways to use stratified sampling. Stratified sampling helps ensure that there are enough interviews from each group that you want to compare. For example, if you anticipate different problems occurring at different rates among LOAs, you will need to make sure that there are enough interviews from each LOA to know whether problems are occurring.

Stratified samples can ensure that small subgroups are included. For example, if most migrant children are concentrated in the eastern part of the state, you will want to ensure the sample includes children in the western part of your state.

Stratified samples can help when your state does not have a centralized sampling list. For example, the interviews can be divided among counties and then the county samples can be drawn independently from lists obtained in each county.

Finally, stratified samples can reduce the number of interviews done within large subgroups. For example, your state might want to do 10 interviews in each county. This means that proportionately fewer interviews in large counties and proportionately more interviews in small counties will be conducted.

Cluster Sampling: As the name implies, this form of sampling clusters the interviews in only a few locations. Statisticians usually do cluster sampling in two stages. In the first stage, the statistician might select a few counties in which to cluster the interviews, and in the second stage, he or she might sample children within each selected county. Children now have different chances of being in the sample. Their county has a chance of selection, and they have a chance of selection within their county. Children from different counties now have different probabilities of being in the sample.

The benefits of cluster sampling are that it can limit travel costs and it does not require a centralized sampling list.

One caution is that when cluster sampling is used, there is a risk of missing some groups. If the causes of errors or if key groups of children are not distributed evenly across the state, cluster sampling has a higher chance of missing these groups altogether. For example, if your interviews are clustered by county and thus select only some counties, you might miss a county or district that has a different migrant population.

An Intermediate Approach: Self-Weighting Probability Proportional to Size Sampling

Self-Weighting Probability Proportional Size Sampling (PPS) has a few things in common with complex sampling. However, in PPS sampling, all individuals have the same chance of inclusion. Because of this, sampling weights are not needed.



Bright Idea

There are ways to make simple samples produce some of the benefits of complex samples. For example, if you are considering using a complex sample to ensure that all geographic areas are included, a systematic random sample can be used instead. To do this, the list can be sorted by geographic region and children ordered randomly within geographic regions. If every 10th or 150th, or 2,000th child on the list is selected and there are more than 10, or 150, or 2,000 children in each region, every region will still be represented. This technique also results in doing more interviews in larger areas and fewer in smaller areas.

PPS sampling is one way of limiting the number of locations that the interviewers need to travel to, while avoiding the use of sampling weights. With PPS, a multistage sample is used but no sampling weights, and there is no need to travel to all the geographic regions in the sampling universe, nor is a centralized sampling list needed. However, the number of migrant children enrolled in each county or district must be known. This type of sampling still requires a statistician to ensure the sampling is correct, because a mistake may require use of sampling weights.

Interview Allocation for Complex Samples

In complex sampling plans, once the subgroups of interest are selected, assign a number of interviews. There are usually two ways to do this. One way is to allocate the interviews proportional to the size of the group; the other is to use a quota for each group.

Proportional allocation means that the number of interviews is proportional to the size of the strata or cluster. If the cluster contains 20 percent of the population in the sampled counties or regions, 20 percent of interviews should be completed in that cluster. The advantages are that this can limit the need for weighting. The disadvantage is that many interviews in large strata or clusters may be required.

Using quotas means that interviews are allocated in a way that is not proportional. For example, ten interviews might be allocated to each cluster, strata, or county. Using this approach, the number of interviews in big counties or districts is reduced.

Sample Timing

The fact that the population size and location can vary from week to week complicates the sampling process. Depending on your answers to the questions above, in particular answers about the timing of migrants, you may want to do a rolling sample, a snapshot sample, or a spot sample.

Rolling Samples: A *rolling sample* is one where sampling and interviewing are done continuously throughout the year. A state might select every 200th child enrolled in the MEP throughout the year and do a re-interview. Alternatively, the state might interview every 100th child enrolled in the local areas selected through complex sampling. One big advantage of a rolling sample is that sampling is done close to enrollment, so non-response should be lower. There is also no need to gear up for a large survey effort. A smaller year-round staff of re-interviewers can handle all re-interviews. The disadvantage is that travel costs might be higher for in-person interviews. However, this approach also works well with phone interviews. Because they occur shortly after the original interview, rolling samples can be very cost effective and easy to use.

Snapshot Samples: With a *snapshot sample*, the statistician draws the sample all at once and the interviews take place at one time, resulting in a snapshot of the surveyed populations. There are variations such as taking multiple snapshots (e.g., one at peak summer enrollment and another at peak school-year enrollment). This approach works well for short-term summer programs, for programs that have other kinds of peaks in their enrollment, or for programs that train in the fall and want a quick look at how ID&R is going so they can spend the rest of the year improving recruiters or districts identified as having problems. One disadvantage is that this approach guarantees some non-response because of movement. No matter when the snapshot is taken, part of the migrant population is likely to be missing. A large, one-time effort for re-interviewing will most likely be required.

Spot Samples: *Spot sampling* is a variation on these other approaches. It is similar to spot-checking and involves sampling over time and location. It is usually part of a complex sample design. For example, your state

Bright Idea

A common reason for using PPS sampling is to limit the number of locations visited. For example, if you want to go to five counties and you have a universe of 10,000, take a list of your counties and select the county into which every 2,000th child falls. Within these five counties, conduct a number of interviews proportional to the size of the county. If the county has 20 percent of the children in the sampled counties, then do 20 percent of the interviews in that county.

may have a centralized team of re-interviewers who will travel around the state conducting re-interviews. Your state will save travel costs if the team can visit locations and do several re-interviews at the same time. A list of counties to visit each month could be randomly selected and draw random samples of children for re-interviews in those counties. The disadvantage to using this approach is that it usually requires professional statisticians to draw the sample correctly. Statistical help may also be needed to interpret the results.

Planning for Non-response

After considering sample-timing issues, another factor to consider in selecting a sampling design is non-response. Non-response occurs when someone on the sampling lists is unavailable or refuses to participate in the re-interview. Your state's sampling plan should take into account how many people are likely to refuse and how many may not be found.

Non-response affects the final size of the sample of interviews, and this in turn affects how useful the results are. Take all reasonable steps to reduce non-response. Tool 7 (page 89) in the Tools section includes a checklist of steps that reduce non-response. Also, consider the following suggestions:

- ✓ Make multiple attempts to contact sampled families. Three attempts are usually considered the minimum for in-person interviewing, but ten attempts are more typical by phone.
- ✓ Implement prospective re-interviews as soon as possible after the original interviews. Use COEs from the most recent school year.
- ✓ Implement re-interviews during times of the day when the respondents are home.
- ✓ Implement re-interviews during times of the year when the migrant population is present.
- ✓ Ensure that your re-interviewers have the language and cultural skills needed to make your respondents feel comfortable.

It is important to figure out how to get the sample size needed, even with non-response. Two common ways of accounting for non-response in the sampling design are *over sampling* and *replacement sampling*. If neither approach is appropriate, other methods of selecting replacements are available, so consult with your statistician. It is important that the sampling statistician consider how the replacement sampling method might affect the sampling weights.

In *over sampling*, more people are included deliberately in the sample than are intended to be interviewed. This works well if the non-response rate can be easily estimated. If your state needs a sample of 50 and it is known from experience that about 10 percent of the sample chosen (five people) will not respond, setting the sample size for 56 people increases the likelihood that the 50 respondents needed will be interviewed.

WARNING: When over sampling, all the children selected generally need to be interviewed, even if the desired sample size is reached before all of the interviews are finished on the sampling list. This is particularly true when using a structured random sample. When using a simple random sample, there are some situations when you may stop before the end of the list; however, you would need to consult a statistician first. ***When in doubt, complete the list.***

Bright Idea

Plan for non-response when pulling the sample and carrying out the interviews to help ensure that enough information is collected to identify problems and next steps. For example, 50 re-interviews are needed during the prospective re-interviewing process and a sample of exactly 50 children is pulled. If only 40 children can be located, you will be less likely to find problems that exist and will know less about how to fix those problems. If this non-response is anticipated, and accordingly, 63 children are selected during the sampling process, you can be ensured that there will ultimately be enough interviews to meet your state's needs.

Replacement sampling uses a randomly sampled replacement to take the place of anyone in the sample who is unavailable. There are various ways to do this. Methods of replacement sampling include randomizing the entire sampling list and using multiple sampling lists. Both methods work when you are unsure how many replacements your state will need.

How Do I Know Which Sampling Plan to Select?

By now, you know that there are many different ways to sample and many factors to consider. How do you know which one is best for your state? Consider your answers to the questions at the beginning of the section and review them in light of the advantages and disadvantages of sampling. The primary factors that determine the type of sample selected will be your state's resources and the characteristics of your state's migrant population. The sampling tools will assist in identifying the types of samples that may be more appropriate (see Tool 2 on page 81 of the Tools section). These questions and tools are guides that will help in consulting with your statistician so that together you can determine your state's best options.

If you suspect that eligibility determination errors are evenly spread among your state's regions, recruiters, and other subgroups, a simple statewide random sample will be most cost effective. If you believe that your state's eligibility determination errors are not evenly distributed or if your most recent discrepancy rate is of moderate size, you may want to use a more complex sampling option and/or use more than the typical sample of 50. Tradeoffs are involved regardless of which option chosen. Consider the following examples:

- ✓ Your state is large and traveling to local sites is expensive, but you do not want to use phone interviews. The travel costs are decreased by using a complex sample with the understanding that the sample size may have to be increased. You consult your statistician who helps design a sample that will allow interviews to be clustered.
- ✓ Your state has limited statistical resources and wants something simple. At the same time, statewide coverage needs be ensured because the migrant population varies greatly from region to region because of climate and crop patterns. A systematic random sample is selected using a sorted list to ensure coverage. The drawback is that there are some large regions with many interviews in those regions, and you may know little or nothing about errors in the smaller regions.
- ✓ Your state has some regions (or recruiters or seasons) that have much greater known discrepancy rates than the state average. You choose to stratify by region to ensure that there will be enough interviews in problem regions to fix the issues. The drawback is that a larger sample size may be needed because, if the sample is limited to 50, new problems may be missed in some regions and enough problems may not be found, even in the worst regions, to get the information your state needs to improve. You decide to increase the sample to 80 children spread across the four regions in your state. For the two regions with higher known discrepancy rates, 30 children are allocated to each, anticipating that there will be between 10 and 15 errors in each region. The two lower rate regions get 10 interviews each—enough to provide an early warning if the number of errors is jumping up in those regions.

For each situation, the suggested solution is just one of several different approaches that might also have accomplished the objectives. Therefore, it is best to make sampling decisions in consultation with a statistician familiar with the state's unique goals and migrant population.



Bright Idea

One way to use the multiple-list method is as follows. When you sample, draw three simple random samples of your target sample size instead of one. You will then have three lists: List A, List B, and List C. List A is your main sampling list. If someone on this list cannot be found (say, the 17th person), you use the corresponding person (the 17th) on List B. If your re-interviewers cannot find that person, then you use the 17th person on List C.

Prepare for Re-interviewing Data Collection

Jump Start

Once you have decided on your sampling strategy, it is time to get ready for your re-interviews.

- ✓ Develop the data collection strategy;
- ✓ Develop the re-interview form; and
- ✓ Recruit, train, and test your re-interviewers.

Plan Data Collection with Your Respondents in Mind

When planning for re-interviewing, remember that many migrant workers may not respond to the re-interviews in the ways expected. As mentioned earlier, many migrant workers are polite and cooperative when being interviewed. They might want to give the answers they think the interviewer wants to hear out of courtesy. They may not refuse the re-interview, but they will not want to get themselves or the original recruiter in trouble. In addition, they may find the re-interview process intrusive or intimidating.

The beginning of this guide discussed considerations about how your state may want to interact with families, whether the original recruiter would introduce the re-interview process, and whether the focus would be on the family, the recruiter, or ID&R process improvement. In addition to those answers, the following suggestions will help your state obtain the best information from families.

- ✓ Use culturally competent re-interviewers experienced with working with migrant families. They should speak the language, understand the work, and understand migration patterns.
- ✓ Create a relaxed and friendly atmosphere. Consider an introduction in some form (e.g., a reminder note or advance phone call) from a MEP staff person or someone from the district without having them present (or on the phone) during the interview. However, remember that strategies to make the family feel comfortable and answer frankly (e.g., have them interviewed by someone they know) may not be the same as what you would do to eliminate the potential for prepared answers, interference, and coaching (e.g., from the original interviewer or local school district).
- ✓ Establish rapport. Ask about the work they are doing or how the harvest is going. Make a connection between the interviewer's background and that of the family. Focus the interview on what the family told the recruiter and elicit the information as much as possible in a story framework.
- ✓ If you have incorporated the re-interview into your state's ID&R process, remind the family that the initial recruiter said there might be a second interview. Apologize for the intrusion.
- ✓ If this is a phone interview, have some way for the family to verify that the interviewer is legitimate (e.g., refer to the original interviewer by name, use names of children and other household members). Families may be concerned about telephone scams and identity theft.
- ✓ Leave written information (in the family's primary language) explaining the re-interview and/or a phone number to call if there are questions.
- ✓ In a non-threatening manner, let families know if they may lose access to services, or encounter any other risks because of the re-interview.

Develop Your Re-interview Form

Jump Start

The interview form is a critical part of the re-interview design. It should be complete, easy to use, and easily understood by both families and the re-interviewer. See the sample interview forms in Tool 9 (page 96) of the Tools section. Tailor these samples to your state's specific needs:

- ✓ Review your state's ID&R manual;
- ✓ Review the relevant federal regulations and guidance;

- ✓ Review the samples in the Tools section;
- ✓ Consider the information that your state will need to collect;
- ✓ Consider the sample timing;
- ✓ Consider the type of interviewing (i.e., basic monitoring or enhanced re-interviewing to identify problems);
- ✓ Develop items to address your state's information needs;
- ✓ Include an introduction on your state's form;
- ✓ Use appropriate types of questions for each data item;
- ✓ Pilot your state's data collection instrument using the re-interview protocol and try to approximate actual field conditions; and
- ✓ Modify the instrument based on your pilot test.

The Introduction

An introduction on the interview form helps the interviewer explain the survey to the respondents. The precise wording of your introduction should explain the re-interview process, including how your state chose respondents for the process. Include references, if possible, to the original interview. For example, you may choose to do rolling sampling, with follow-up interviews carried out approximately one month after the original interview. In this case, introduce the re-interview by saying, "About one month ago, one of our recruiters, Maria Lopez, spoke with you. Maria may have mentioned to you that, as part of our quality control processes, we re-interview a few families each month. Your family has been selected to be re-interviewed this month." Alternatively, if interviews are done only once a year, families should be reminded of the month in which they completed the original interview.

Ensure a Complete Interview Form

Your interview form should include all the information that your state needs to make an eligibility re-determination. OME guidance provides information on what should be included. Also consult with your state's ID&R staff and manual to ensure that all the elements of the eligibility process are included. Some states complete a new COE, whereas others include only key information on the re-interview.

Remember at a minimum your state should assess, *independent of the original interview*:

- ✓ The identity of the child (e.g., Is this the same child who was previously determined eligible?);
- ✓ The age of the child at the time of the move;
- ✓ Whether the child had already completed high school or earned a GED at the time of the move;
- ✓ If the family moved in order to seek or obtain work in agriculture and/or fishing;
- ✓ Whether the worker was to be employed in this work on a temporary or seasonal basis;
- ✓ If the child moved with the qualifying worker or if the child joined the worker within the allowed period;
- ✓ Where the family resided before they moved;
- ✓ Where the family resided after they moved;
- ✓ If the move was from one school district to another;
- ✓ If the move was due to economic necessity; and
- ✓ If the move occurred no more than 36 months prior to the date of recruitment.

Question Methods

Use both checkbox-type items and open-ended items for obtaining information needed to make an eligibility decision. The checkbox items provide clear documentation that all criteria were met. The open-ended items provide backup information needed to justify the decision. Re-interview questions are provided in Tool 9 (page 96) in the Tools section. Below are examples of how to ask open-ended and close-ended questions about a family's move.

Determining a Move:

Open-Ended Example: What were the dates of the moves?

Close-Ended Example: Did you move looking for work in agriculture or fishing in the last 3 years?

☐ Yes ☐ No

Move Details:

Open-Ended Example: Where did you move from? City____ State____, Country____

Open-Ended Example: Where did you move to? City____ State____, Country____

Close-Ended Example: Was one of the moves in the last three years across school district boundaries (or at least 20 miles in the case of Alaska)? ☐ Yes ☐ No

Develop an Effective and Efficient Data Collection Strategy

Jump Start

A good data collection strategy should be both *effective* and *efficient*. An *effective* data collection strategy is one that allows you to minimize non-response and collect complete and accurate answers that meet your state's needs within the time available. An *efficient* data collection strategy allows you to spend as little time, money, and other resources on data collection as possible. An inexpensive, easy data collection strategy that does not collect timely, accurate data is not effective or efficient. Conversely, an expensive and time-consuming strategy does not guarantee an effective or efficient data collection.

The following will help you figure out what your state needs to get started:

- ✓ Review the standards that apply to data collection;
- ✓ Create a data collection plan;
- ✓ Pilot test your data collection process;
- ✓ Adjust your data collection plan based on the results of your pilot test;
- ✓ Identify your re-interviewers;
- ✓ Train your re-interviewers;
- ✓ Test your re-interviewers; and
- ✓ Manage your data collection process.

Standards

To collect data effectively and efficiently, become familiar with the standard for obtaining data from families. The three standards that apply are listed in Table 4.

Table 4. Criteria and Standards for Obtaining Data from Families

Criterion	Acceptable Standard
Re-interviews are conducted systematically and in an approved way.	The state uses face-to-face re-interviews or a predetermined combination of face-to-face and phone re-interviews, and makes efforts to either match the initial interview type or provide data on the comparability of face-to-face vs. phone interviews for its population.
Re-interview instrument is complete and unbiased.	The state uses a re-interview protocol that contains all items used in making the original eligibility determination. The protocol, including both items and additional probes, has been pilot tested with migrant families similar to those being re-interviewed.
Re-interviewers follow procedures to gain the trust of the families.	The state lets families know about the re-interview processes during the original interview; uses interviewers and re-interviewers who can communicate comfortably with the families; and ensures that the interview protocol is not intentionally or unintentionally threatening or harmful to the family. Re-interview protocols include appropriate informed consent.

Reflection

What are your state's data collection resources? What type of information does your state need? The answers will influence the data collection planning decisions and help develop good data collection processes. Remember, no matter how efficient the data collection process is, if the information it generates is not good, it is not an effective process. The following questions will help you begin to plan your data collection process.

Re-interviewing Resources (Time, Money, and Personnel)

When does your state need to start re-interviewing? _____

By when does your state need to finish? _____

What external deadlines does your state have from OME? _____

What type of interview timing is your state using? ☐ Rolling ☐ Snapshot ☐ Spot

When does most of your state's enrollment happen? ☐ Summer ☐ Regular Term ☐ Other _____

Do your state's deadlines and resources allow for conducting interviews shortly after enrollment? ☐ Yes ☐ No

Does your state have qualified re-interviewers available during the re-interview timeframe? ☐ Yes ☐ No

Does your state have the financial resources to contract out for services? ☐ Yes ☐ No

Does your state need to use in-kind/in-house resources? ☐ Yes ☐ No

Effective Data Collection Strategies

Consider these ideas for *effectively* collecting information:

- ✓ Pilot test your instrument! Do this with the population, in the language(s) you will be using, and under the conditions expected.
- ✓ Take steps to reduce non-response (see Tool 7 on page 89 of the Tools section).
- ✓ Use qualified re-interviewers who speak the language(s) of, and have worked with, your migrant population.
- ✓ Train re-interviewers to complete your protocol correctly and consistently.
- ✓ Ensure that your re-interviewers know who is and is not a qualified respondent. Will you accept other family members if the original respondent is unavailable? Will you accept information from non-family members if the family has moved?
- ✓ Monitor your data collection closely, and check re-interviewer data quality regularly.
- ✓ Address data collection and recording problems as they occur. If you need to follow up with respondents, do so quickly after the interview so that their memories are fresh.

Efficient Data Collection Strategies

These ideas may help you collect your data *efficiently*:

- ✓ Use the simplest sampling approach that will meet your state's information needs. (See Tool 2 on page 81 of the Tools section.)
- ✓ Know the key moving dates for your migrants, and re-interview as soon after the original interview as possible. When possible, sample using a rolling re-interview approach. Having to find people or visit multiple households to get one re-interview takes a lot of time.
- ✓ If you have limited resources and need to do phone interviewing, do a pilot study (see Pilot Testing below) to make sure it can be used effectively in your state with the population.
- ✓ Make sure your re-interview instrument incorporates checkboxes that allow for clear and easy eligibility determinations. Check the completed forms to make sure your re-interviewers are using these boxes correctly and consistently.
- ✓ Encourage your re-interviewers to answer open-ended questions concisely and completely, using legible printing.
- ✓ Have someone on-call to answer re-interviewer questions. Having to go back and find families to clear up issues is inefficient.

Pilot Testing Your Data Collection Protocol

The final step in developing your data collection plan is doing a pilot test of your data collection tools and protocols. In a pilot test, the data collection process is tried out with a small sample of individuals who are similar to the respondents before the instrument is used on the actual sample. Pilot testing your data collection smoothes out the kinks before your state is in the full swing of things and allows problems to be fixed with protocols before re-interviewing begins.

Jump Start

There are several ways to do the pilot test. The best pilot tests try to re-create the conditions of the actual interview using experienced interviewers. If your state is doing in-person re-interviews, send one or more experienced interviewers to at least five, and as many as 15, families to carry out the interview using their introduction script, processes, and guide. If your state is doing phone interviews, have one or more experienced interviewers call at least ten, and as many as 15, families and carry out the interview using the introduction script, processes, and guide. At least five of these same families should be visited to determine whether the answers they give by phone are similar to their in-person answers. Based on your pilot test, alter question wording and order to make your instrument work as effectively as possible for your population. When carrying out pilot testing, include the following steps:

- ✓ Let the families know that this is a pilot test of the interview and that you want to be sure that they clearly understand the questions.
- ✓ Have your re-interviewer use the re-interview protocol as it is written, timing how long it takes to complete.
- ✓ Once he or she has completed the entire re-interview, have the re-interviewer check the answers against the families' original COE.
- ✓ Have the re-interviewer check for the following issues with the respondent:
 - If the respondent found any questions hard to answer or confusing, record the responses to determine whether the problem indicates a trend.
 - If the respondent appeared to have difficulty answering any questions, follow up with clarifying questions, such as, "It seemed as if you had trouble with question _____. What were you considering when you were answering that question?"
 - If the respondent's answers are not internally consistent or do not make sense, follow up with clarifying questions such as, "When I asked you whether you moved to seek agricultural work you said 'yes,' but

when I asked you what kind of work you were seeking you said that you were looking for work in construction. Can you tell me more about the kind of work you were looking for when you moved?”

- If the answers are not consistent with the original COE, follow up with clarifying questions such as, “When Maria Lopez spoke with you last month, she recorded that you were employed planting tomatoes, and here it says that you are working with potatoes. Can you tell me a bit more about this?”
- ✓ Debrief the interviewers to find out how the interviews went. Did the introduction put families at ease? Were interviewers able to follow the protocol? Was there confusion? What could have been done better? Experienced interviewers can usually spot problems with data collection protocols.
- ✓ Score the pilot interviews, and make eligibility determinations for each. This will identify whether the right information is being collected and if there is enough detail to determine eligibility. Imagine how you will feel if, if after working hard to collect your data, you realize that you do not have the data your state needs!

Select, Train, and Test Your Re-interviewers

Jump Start

For prospective re-interviewing, it is acceptable to use your state’s existing recruitment staff/contractors as re-interviewers for two out of every three years. However, it is important to carefully select and assign re-interviewers, and to ensure that the re-interviewers used are as independent as can reasonably be secured. The recruiters used as re-interviewers need to focus on collecting the most complete, fair, and accurate information possible, given time and instrumentation constraints. They are the frontline data collectors and have a powerful influence on the quality of the information gathered. The following will help you get started:

- ✓ Review the standards that apply to obtaining data from families;
- ✓ Establish any known conflicts of interest as you identify re-interviewers;
- ✓ Find re-interviewers who can establish a good rapport with families;
- ✓ Develop a training guide specific to your re-interview data collection process; and
- ✓ Implement the training and test the re-interviewers on your data collection process. (Even if they are extremely experienced, recruiters still need training and testing on the re-interview purpose and process itself.)

Standards

To select and support your re-interviewers appropriately, become familiar with the standards below for ensuring re-interviewer independence and skills. Table 5 lists the six standards that apply. Table 5 is especially important to consider every third year when your state is required to use independent re-interviews for its prospective re-interviewing.

Table 5. Criteria and Standards for Ensuring Re-Interviewer Independence and Skills

Criterion	Acceptable Standard
Re-interviews are independent from original interviews.	The state ensures, at a minimum, that re-interviewers did not carry out the original interviews and had no knowledge of the content of the original interviews. Once every three years, the State must use re-interviewers that are not SEA or local operating agency staff working to administer or operate the MEP.
Re-interviewer conflicts of interest are known and addressed.	The state addresses the conflicts of interest that it finds.
Re-interviewers have the needed linguistic capability.	The state makes an effort to match interviewers hired to the language of the parents they are to interview.
Re-interviewers have the necessary population knowledge.	The state makes an effort to select interviewers who have knowledge of and experience with migrant populations.
Re-interviewers have training and guidance.	All re-interviewers have detailed training regarding the eligibility requirements, the purpose of the re-interviews and the re-interview instrument.
Re-interviewer collects data accurately.	All re-interviewers are tested and/or observed during actual or practice interviews to ensure they are applying the protocol correctly.

Recruit Your Re-interviewers

The re-interviewer should focus on collecting the most complete, fair, and accurate information possible, given time and instrumentation constraints. Checking for re-interviewer conflicts of interests can help with this.

The following are examples of conflicts of interest:

- ✓ Knowing the answers families gave in their original interviews in advance of the re-interview;
- ✓ Having knowledge of the specific sampled families and their circumstances;
- ✓ Wanting to preserve the original interviewer's reputation for accurate data collection;
- ✓ Having a stake in raising or lowering the state's recorded discrepancy rate; and
- ✓ Holding strong opinions about the desirability of enrolling more/fewer children in the state MEP.

Re-interviewers should be able to gain the trust of, and clearly communicate with, the respondents. Using re-interviewers who have the language skills and cultural knowledge to reach your migrant population increases the effectiveness and efficiency of your interviewing by:

- ✓ Providing respondents with a re-interviewer with whom they feel comfortable;
- ✓ Helping ensure that respondents' answers are accurately represented;
- ✓ Ensuring that the re-interviewers understand and record what the respondents say explicitly; and
- ✓ Ensuring that the re-interviewers ask enough questions to resolve any questions raised by the respondents' responses (e.g., asking questions to distinguish if a worker's move was for vacation purposes or for temporary agricultural work).

Remember: At least once every three years your state must use **independent re-interviewers**. These re-interviewers are not SEA or local operating agency staff members working to administer or operate the MEP in any capacity nor any other persons who worked on the initial eligibility determinations being tested. Table 6 provides some advantages and disadvantages of different types of independent re-interviewers.

Table 6. Advantages and Disadvantages of Types of Independent Re-interviewers

Source of Re-interviewers	Advantages	Disadvantages
State ID&R specialists who did not carry out original interviews (e.g., those from different regions or switched out to different locations within the same region)	<ul style="list-style-type: none"> • Already trained in ID&R. • Usually linguistically and culturally competent. • No additional overhead/hiring. 	<ul style="list-style-type: none"> • Not fully independent as they may know the original interviewer or the family. • May have conflicts of interest/an investment in seeing a lower discrepancy rate. • Report to and dependent on the same supervisors as the original interviewer.
Internal/special ID&R person who does only monitoring	<ul style="list-style-type: none"> • Already trained in ID&R. • Usually linguistically and culturally competent. • Minimizes additional overhead/hiring. 	<ul style="list-style-type: none"> • May not be feasible except for states with large migrant populations. • May have conflicts of interest/an investment in seeing a lower discrepancy rate. • Report to and dependent on the same supervisors as the original interviewer.
State MEP staff	<ul style="list-style-type: none"> • Already trained in ID&R issues. • May be linguistically and culturally competent. • No additional overhead/hiring. • Excellent control over data quality. 	<ul style="list-style-type: none"> • Have conflicts of interest/an investment in seeing a lower discrepancy rate.
Retired ID&R specialists from your state	<ul style="list-style-type: none"> • Already trained in ID&R issues. • May be linguistically and culturally competent. 	<ul style="list-style-type: none"> • If they have only recently retired, may still remember some of the families from earlier work. • May have conflicts of interest/an investment in seeing a lower discrepancy rate.
Retired teachers/educational specialists from your state (experienced in working with migrant populations)	<ul style="list-style-type: none"> • Knowledge of your state's migrant population. 	<ul style="list-style-type: none"> • Not trained in ID&R issues.
Retired MEP staff from your state	<ul style="list-style-type: none"> • Likely already trained in ID&R issues. • May be linguistically and culturally competent. 	<ul style="list-style-type: none"> • If they have only recently retired, may still remember some of the families from earlier work. • May have conflicts of interest/an investment in seeing a lower discrepancy rate.
Independent consultants who specialize in migrant issues	<ul style="list-style-type: none"> • Knowledge of migrant population. • May be linguistically and culturally competent. • Likely to be truly independent and without conflicts of interest. 	<ul style="list-style-type: none"> • Likely not trained in ID&R issues.
ID&R specialists from other states	<ul style="list-style-type: none"> • Likely to be truly independent and without conflicts of interest. 	<ul style="list-style-type: none"> • Likely more costly than other groups. • May not have knowledge of your state's population and any state-specific ID&R issues.
Universities (professor-led student groups)	<ul style="list-style-type: none"> • Likely more affordable than consultants. • Likely to be truly independent and without conflicts of interest. 	<ul style="list-style-type: none"> • Limited population knowledge and language skills. • Limited availability (may have to do the work on their own schedule.) • May limit your access to the data. • Likely not trained in ID&R issues.
Individual independent consultants	<ul style="list-style-type: none"> • Likely to be truly independent and without conflicts of interest. 	<ul style="list-style-type: none"> • Likely more costly than other groups. • May not have knowledge of your state's population and ID&R issues.
Independent consultants or university groups shared across multiple states.	<ul style="list-style-type: none"> • Likely to be truly independent and without conflicts of interest. • May be less costly than other consulting arrangements. • Training can be provided one time, limiting per-state startup costs. 	<ul style="list-style-type: none"> • Need to coordinate hiring and timing with other states. • May have timing conflicts if other states have a similar migrant schedule. • Likely not trained in state-specific ID&R issues.

Train and Test Your Re-interviewers

Even for experienced recruiters, training and testing are important for obtaining valid and reliable results. A sample training agenda and checklist are provided in Tool 8 (page 90) in the Tools section. At a minimum, if you are using experienced, trained recruiters as re-interviewers, training should cover:

- ✓ The purpose of the re-interviews. (Tip: Use the information considered on pages 15-17.)
- ✓ Your sampling approach:
 - The number of interviews your state needs to meet your desired sample size
 - Any populations of special interest that were used to stratify or systematize the sampling
 - The sampling lists that the re-interviewers will use
 - The re-interview process, including:
 - How to apply the sampling lists and know which family to interview (if you do not give them a list in the order that families should be contacted)
 - Materials to have ready before the interview
 - How to make contact with the selected family
 - How many times to attempt to contact a family
 - Who is an acceptable re-interview respondent (Ideally the person who was originally interviewed, but another parent, guardian, close family member, or roommate might be acceptable)
 - What are the tradeoffs between losing a response versus collecting possibly less accurate information
 - How to introduce yourself and the purpose of the re-interview
 - How to encourage response (Assure families that the data collection is to double-check the ID&R work, not because their original answers are being questioned. Let them know that they were randomly selected. Let them know how important their answers are in serving other migrants in the state. At the same time, give families accurate information about the potential outcomes of the re-interview.)
 - How to follow the re-interview process, utilizing Tool 10 “Re-interview Process Observation Form”
 - How, where, and when to return re-interview forms
 - What to do if families are not home
 - What to do if families have moved
 - How to document attempts and track response rates
 - How to ask open-ended questions
 - How to avoid leading questions
 - In the event of an emergency, who to contact and how to do it

If an external, independent re-interviewer is used, the following points will also need to be addressed in your re-interviewer training:

- ✓ The criteria that need to be met for a child to be eligible. (See page 31)
- ✓ Any issues or special circumstances specific to your state that make eligibility determinations difficult (e.g., subsistence fishing in Alaska, trends in vacation moves in your state).
- ✓ How to make eligibility determinations.

Re-interviewer Testing

Several options are available for testing re-interviewers to ensure data quality. This process lets you know whether your training worked and whether interviewers are following the protocols. Consider doing one or more of the following, depending on the re-interviewers' level of experience:

- ✓ Observe the re-interviewers doing role-play exercises during training;
- ✓ Have each re-interviewer walk through the protocol with a trainer;
- ✓ Develop a short quiz on the key points of your re-interview protocol;
- ✓ Observe the re-interviewer carrying out the protocol on “practice” families (maybe families who have graduated the program or who you know are willing to help); and
- ✓ Observe the re-interviewer carrying out one of their first interviews. If the re-interviewer deviates substantially from the protocol and asks leading questions or questions that contaminate the interview, this family may be lost from the sample.

Regardless of the types of testing chosen, give each re-interviewer feedback on what he or she did well and where changes are needed.

Manage Your Data Collection

This section describes how to track your data collection, monitor your response rate, and ensure that data only from families in the sample are collected. It also discusses ways to ensure that your eligibility determinations are accurate and verifiable.

The following will help you get started:

- ✓ Review the standards that apply to obtaining data from families and making eligibility determinations;
- ✓ Document and manage your state's data collection; and
- ✓ Complete, document, and double-check your state's eligibility re-determinations.



Standards

To manage your state's data collection well, become familiar with the standard practices for obtaining data from families and making eligibility determinations. Table 7 lists the standards that apply.

Table 7. Criteria and Standards for Data Collection and Making Eligibility Determinations

Criterion	Acceptable Standard
Interviewees match the sampling list: No unauthorized replacements.	The state re-interviews only the families of children on the original or authorized replacement sampling lists.
Response rate is sufficient.	The state identifies the response rate, which exceeds 75 percent, and reasons for non-response are known.
Non-response bias is addressed.	The state identifies the extent and types of non-response, and particularly where the response rate is below 75 percent, discusses the likely impact of non-response, and, where possible, applies appropriate weights for non-response.
Process for determining eligibility is independent.	Eligibility decisions are independent of the original decisions.
Eligibility determinations are documented clearly.	Clear protocols for determining eligibility for re-interviews exist and are followed either by the re-interviewer or by an expert reviewer.
Reasons for changes in eligibility status are known.	If the eligibility determination changes, the state documents the specific reasons for differences in the COE and eligibility status between the original and the re-interview.
Ineligibility determinations could be appealed.	For children who are determined to be ineligible upon re-interview, the state has a consistent, documented process that allows recruiters, LOAs, families, or others to provide information so that an independent examiner can review the determination.

With your re-interview protocols in place, and your re-interviewers recruited, trained, and tested, your state is almost ready to begin the re-interviews. First, however, make sure that your state can manage and process the information it is collecting.

Document and Manage Your State's Data Collection

The key to managing and monitoring your state's data collection is good documentation. Maintain a complete list (e.g., in an Excel spreadsheet so that you can print copies) of everyone who is sampled for re-interviewing, along with any subgroup information (e.g., region, original recruiter). On that list, provide columns in which interviewers and others who handle the re-interviews can note:

- ✓ The dates and times of each attempt to interview a family;
- ✓ The outcomes of those attempts (not at home, refused, try later, moved, interviewed);
- ✓ The outcomes of completed interviews (qualified, not qualified);
- ✓ The name of the person who interviewed them;
- ✓ The name of the person who made the eligibility determination;
- ✓ The name of the person who confirmed the eligibility determination;
- ✓ The reasons for any change to not qualified status in narrative form;
- ✓ The reasons for any change to not qualified status categorized;
- ✓ Date of any appeals made and name of the instigator of appeal;
- ✓ The outcome of any appeals made; and
- ✓ Notes of any special issues or circumstances.

Tool 11 in the Tools section (page 101) contains a sample Interview Outcome Disposition Tracking spreadsheet that can be copied into Excel.

This list allows your state to verify that only those families in the original sample have been interviewed (because information from non-sampled families can easily be identified and disregarded). It also allows for monitoring the response rate as often as the list is updated. (Divide the total number of families for whom contact was attempted by the number of families who have completed the interview.) The resulting number provides the causes of non-response (just tally up the attempt outcomes column) and indicates whether non-response was distributed evenly by subgroups. It also allows for easy documentation and categorization of the reasons for changes in eligibility later on.

Remember: When the re-interview forms start to come in, review each form to make sure that it is providing information your state needs. For prospective re-interviewing, the sample size is small, so make sure that each completed re-interview provides as much useful information as possible.

Criteria for Collecting Good Information

Is the information on the interview form complete (e.g., no items are missed, all checkboxes are filled, and all answers are clear)? ☐ Yes ☐ No

Is the information detailed (e.g., open-ended items are completed with enough information that a reader can understand the content of the interview)? ☐ Yes ☐ No

Is the information legible? ☐ Yes ☐ No

Is the information verifiable (e.g., if you were to ask the respondent whether his or her answer is correctly reported he or she could tell you)? ☐ Yes ☐ No

Is there enough information to make an eligibility determination without relying on additional sources or asking follow-up questions? ☐ Yes ☐ No

Make, Document, and Double-check Your Eligibility Re-determinations

As the data are collected, your state's eligibility determinations will be made and documented. There are several options to choose from in making eligibility determinations. These range from simple, single-person approaches to approaches that involve expert group consensus.

Before the re-interview process begins, consider recruiting three to five individuals experienced in making eligibility determinations who can help with very difficult determination issues. Brief these individuals on your state's re-interview process and timeline. That way, help will be available when it is needed.

Establish an Appeals Process: Every state should have a formal process in place that will allow families, LOAs, and other interested parties to contest ineligibility determinations from the re-interview process. This process should be independent of your recruitment and re-interview processes.

Tailor the process to meet your state's resources and needs. Challenges to eligibility re-determinations may come from school district staff, recruiters and ID&R staff, state office MEP staff, or parents themselves, depending on who is notified of ineligibility decisions. When ineligibility decisions are communicated, information should be included on how to appeal the decision, to whom, and by when. Be sure to clearly explain the reason for ineligibility (e.g., employment was not temporary). Different types of potential appeals processes include:

- ✓ A formal group made up of independent, knowledgeable volunteers;
- ✓ A designated expert outside the state MEP office; and
- ✓ A designated person at the state MEP office. (This person should not oversee the re-interviewers directly.)

The individuals in charge of this process should have expertise in ID&R and have knowledge of your state's migrant population and issues. The individuals should keep complete and accurate records of the appeals process and outcome for each case. (See the Appeals Process Documentation example in Tool 14, page 104, of the Tools section.)

Bright Idea

Use the following approaches individually or in combination to make your eligibility re-determinations.

- ✓ Have your independent re-interviewers make the initial eligibility determination and clearly document it by filling out a designated section of your re-interview form or a separate eligibility determination form. Make sure that the determination includes a yes/no checkbox for eligibility and a written justification of that determination.
- ✓ Have an independent person or group make eligibility determinations based on the completed forms. As with the independent re-interviewers, this person or group should clearly document the determination using both yes/no and open-ended items.
- ✓ Have each preliminary eligibility determination reviewed by a group of experienced recruiters. Have the group document reasons for agreeing or disagreeing with the initial determination.
- ✓ Have independent re-interviewers check each other's eligibility determinations. Document agreement or disagreement in writing, on the form.

Analyze and Use Your Data

Jump Start

As the re-interviews are completed, the data can begin to be analyzed and used. The following will help you get started:

- ✓ Identify ineligible children and children with discrepancies between the re-interview and original COE;
- ✓ Look for patterns in COEs determined to be ineligible or to have discrepancies;
- ✓ Decide whether more information is needed; and
- ✓ Report and use the results of your re-interviews.

Review Your Data

For prospective re-interviewing, your state's goal is to get a cost-effective early warning of eligibility determination problems that may be developing. To make the most of the data available, use information both from the children who were found to be ineligible and from those who are eligible but who had discrepancies between the original COE and the re-interview.

For children who were found to be ineligible:

- ✓ Determine whether the number of ineligibilities was higher than, lower than, or about what was expected for your most recent known discrepancy rate (Multiply the established rate by the number of surveys completed to get the expected number of errors.);
- ✓ If there are enough ineligible determinations, look for patterns or themes in the reasons for ineligibility (e.g., Were several children determined to be ineligible because of vacation moves or lack of intent to seek qualifying work?); and
- ✓ Consider whether additional re-interviewing or other information is needed to identify and fix emerging problems (e.g., Did you find more ineligible children than you expected but no clear pattern emerging?
- ✓ Would additional re-interviews help establish a pattern?

Remember: Make sure that ineligible children are removed from your state counts and do not receive (or continue to receive) services!

Even though some re-interviews may confirm that the sampled child is still eligible for services, you may find that substantial discrepancies exist between the original COE and the re-interview. These discrepancies may provide an early warning that a problem is developing. For children who are found to be eligible but whose COEs and re-interviews have discrepancies:

- ✓ Determine whether the discrepancies are minor (e.g., small changes in dates, wording, descriptions) or major (e.g., dates that are off by weeks or months, changes in type of work sought);
- ✓ Where appropriate, follow up with your recruiters and re-interviewers to determine the cause for the discrepancy (e.g., Did something actually change for the family? Was a different person re-interviewed who gave different information? Did the recruiter and the re-interviewer hear the same thing but interpret it differently or emphasize different facts in what they recorded?); and
- ✓ If there are enough discrepancies, look for patterns or themes.

In addition, review both the original COEs and the re-interview forms for quality and completeness of information. Check whether the quality of the information provided is sufficient to prevent determination errors and discrepancies.

Report and Use the Results of Your Prospective Re-interviews

Reporting the results of the prospective re-interviewing will take different forms for different audiences. For example, SEAs may want to report the results of their prospective re-interviewing to their chief state school officers and their state MEP parent advisory council. Currently, OME requires that SEAs briefly report on the process and outcomes of the prospective re-interviewing process each year when reporting their migrant child counts to the U.S. Department of Education. The information provided should detail how the SEA sampled, the number of families the SEA re-interviewed, the number and type of ineligibility determinations the SEA found, and the type of follow-up actions the SEA took. Below is a sample of what the report might look like.

Sample Prospective Re-interview Summary

During the 2008–2009 school year, the SEA carried out prospective re-interviews with 50 migrant families whose children were determined to be MEP eligible during the 2008-2009 reporting period. These families were selected using a simple random rolling sample of children enrolled during the year, with an over sample drawn to allow for replacement of families who could not be found or did not respond. Two families did not respond and were replaced using the over sample. Experienced, Spanish-speaking recruiters contacted families two weeks after their original interview. Re-interviewers were assigned only to families whom they had not recruited. Although, based on our established defect rate we would have expected to find five to six eligibility errors, of the 50 children tested by the re-interviews, three children were determined to be ineligible. All three children are in families that have one member who does qualifying seasonal agricultural work; however, the children resided permanently in the school districts in which they are enrolled, and the families went to other states for summer vacation, rather than to seek employment. As a result, each child (and five siblings) was removed from the MEP roster before services had begun, and the MEP arranged for updated training on identifying vacation moves for all recruiters statewide on February 15, 2010.

The main goal of prospective re-interviewing is to provide an early warning of developing problems. You should report the findings of the re-interviewing back to your recruiters at regular intervals throughout the year. Specifically, you should let your LOAs, recruiters, and those who supervise, train, and support them know:

- ✓ How many re-interviews have been conducted;
- ✓ How many determination errors and/or large discrepancies have been found;
- ✓ Any patterns or issues that have come up in the errors and discrepancies found to date;
- ✓ Corrective actions that you are taking; and
- ✓ Any issues arising about the quality and completeness of COEs reviewed to date.

Discuss with your recruiters or their supervisors how any recurring issues can be resolved, and use these discussions to determine whether more information is needed to resolve problems you find.

You Found a Problem: What Next?

You might also find yourself completing 50 interviews and noticing that your state has an ID&R problem. In this case, it may be useful to do more prospective re-interviews and gather more information. Consult with a sampling statistician on the most efficient way to sample additional interviews to identify the causes or errors so that your state's ID&R process can be improved.

Before completing more interviews, consider what your state wants to find out and how the information will be used. Is your state interested in identifying the types of errors? Do you want to know which LOAs or recruiters are making errors? Or both? How confident does your state want to be about the information gathered? And how much is your state willing to spend to gain this confidence? Does your state want to feel confident that LOAs or recruiters are recruiting correctly—which may require many interviews—or is your state looking for early

warning signs of problems that may take fewer interviews? In some cases, the discrepancies between your state's original eligibility determinations and the re-interview eligibility determinations may be large enough that your state will wish to carry out a full retrospective re-interview process. If this is the case, discuss the problems found and your state's concerns with OME and read the next section of this guide: Plan and Implement Retrospective Re-interviews, in Section IV.

If you decide to do more interviews, a statistician should be consulted about how many individuals to include in the sample. However, a rough estimate can be calculated by dividing the number of cases wanted by your most recent known discrepancy rate. For example, if you need to analyze 30 ineligible cases and you have a 20 percent original rate, you will need to complete 150 re-interviews (e.g., $30/0.2=150$). If you had a lower original rate, you will need to complete more re-interviews.

Looking at Differences among Groups and Testing Recruiter Accuracy

If your state has goals for the prospective re-interviewing that extend beyond simply identifying whether a problem exists, it is likely that a complex sampling or other sophisticated sampling techniques should be used. These techniques are outlined on pages 25-27. Most require a sampling statistician to implement.

Consider This

When reporting the results, remember to stay true to the purpose and methods selected. If you started with a small sample and want to divide the results by subgroups (as in a complex sample), check with your statistician to determine whether the sample is large enough to do this. If you found only a few errors, do not force a pattern onto them. It is better to simply note that a problem may be beginning and carry out more re-interviews to determine whether a clear problem emerges.

Section IV: Plan & Implement Retrospective Re-interviews

Jump Start

If it is necessary to conduct retrospective re-interviews, the following information will help you carefully plan a process that will lead to successful re-interviews. This section contains information about each step in the re-interview process. You will also find tools and sample materials in the Tools section.

This section will prepare you to:

- ✓ Identify your state's sampling needs so you can discuss them with your statistician;
- ✓ Develop a re-interview guide;
- ✓ Develop re-interview monitoring tools;
- ✓ Recruit re-interviewers;
- ✓ Train re-interviewers;
- ✓ Monitor your re-interviewing process and the information collected;
- ✓ Document your state's eligibility re-determinations;
- ✓ Calculate your state's defect rate; and
- ✓ Report the results of your state's re-interviews.

Identify Your Sampling Approach for Retrospective Re-interviews

Jump Start

Identifying and drawing a sample thoughtfully will ensure that the sample meets your state's information needs.

The type of information your state needs to know, the type of sampling design chosen, and the difficulties anticipated in getting a response will affect the size of the sample your state will need. The following steps will help you get started:

- ✓ Review the standards that apply to sampling;
- ✓ Determine the purpose of your state's current re-interviews; and
- ✓ Collect information about eligibility defect rates from previous re-interviews.



Standards

Before planning the re-interviews, become familiar with the standards for practices set for the sampling process. Table 8 lists the seven standards for sampling.

Table 8. Sampling Standards and Criteria for Retrospective Re-interviewing

Criterion	Acceptable Standard
There is a sampling plan.	The state has a written sampling plan that includes a description of the desired precision of the sample, the sampling universe, the sources of data used in sampling, and an explanation of sampling procedures.
Sampling universe is complete.	The state has a structured approach to generating and checking the sampling list, and the sampling universe list contains 99 percent of the migrant children enrolled.
Random sampling of eligible children.	All eligible children in the sampling list have a known, non-zero probability of being drawn that is independent of the selection of others.
Adequate size of planned sample.	The planned sample size will result in, at least, a confidence interval of +/- 5 percent at the 95 percent confidence level.
Sampling plan is followed.	The state follows the sampling plan, with minor exceptions.
Sampling bias is addressed.	The sample used represents the entire universe.
Sampling replacement is systematic.	The initial sampling plan addresses issues of obtaining an adequate response rate from this difficult-to-survey population, and a systematic approach to replacement is used that ensures a known, non-zero probability for each person sampled.

Identify the Purpose, Timing, and Previous Experiences of Your Retrospective Re-interviewing

The goal of retrospective re-interviewing is to determine the number and type of eligibility determination errors for a given period. Usually this period is a program year and includes all children ages 3 through 21 who are eligible for services during the program year. Although you may choose during your retrospective re-interviews to collect data identifying problems that affect specific state regions or other subgroups of your population, the goal of the retrospective re-interviewing effort is to generate a statewide defect rate.

Reflection

Reflect on what you know from earlier re-interviewing processes (either prospective or retrospective). If this is your first time re-interviewing, speak to someone in your state who was part of the last re-interview process or speak to someone from another state with a similar migrant population who has re-interviewing experience.

Use the checklist below to gather information that can help your plan.

How did your state sample last time?

- ☐ Drew one sample randomly from a list of all children in the state.
- ☐ Drew separate samples for different subgroups of children in the state (e.g., by region, county, or LOA).
- ☐ Another way _____.

How did that work?

- ☐ Very well, want to use it again.
- ☐ Well, but want to know what our options are.
- ☐ Need a different method.
- ☐ Not sure.

What was the state's previous defect rate? _____

What was the previous response rate? _____

What problems did you encounter with drawing your sample? _____

What problems did you encounter in obtaining your response? _____

Answer the questions below using current information about your state.

What is the size of your state's migrant population? _____

Where is the list of migrant children?

- ☐ Statewide ☐ Local

How often is the list updated? _____

Can you obtain enrollment figures for local districts or counties? ☐ Yes ☐ No



Bright Idea

Read the latest regulations to make sure that your state is meeting all the current requirements for retrospective re-interviewing. See Appendix B, 34 CFR § 200.89(b)(1).

Develop a Sampling Plan and Draw Your Sample

Sampling plans can range from simple to complex. Your answers to the previous questions will help you select a sampling design. No perfect sampling design exists, and your state may have to make tradeoffs. For example, one type of sampling plan may involve increased travel costs but needs a smaller sample size. Another type of sampling plan may reduce travel costs but requires an increased sample size and statistical costs.

The following steps should be included in your state's sampling plan:

- ✓ Define the sampling universe;
- ✓ Select a random sampling method;
- ✓ Plan to handle survey non-response; and
- ✓ Choose an appropriate sample size.

Identify Your Population: Define the Sampling Universe

The sampling universe includes all members of the population under study. In determining the sampling universe, identify which group needs to be sampled.

If a statewide defect rate is calculated, the sampling universe will be all children included in your state's child count for the program year selected for re-interview. The definitions of who is included in the sample should match your child count definition exactly. Eligible children ages 0 through 2 are not included in state child counts, therefore, these children should not be part of the sampling universe.

Selection of a Random Sampling Method

The selection of the sampling method is often the hardest part of the sampling process. It is a good idea to consult with a sampling statistician who is familiar with the types of samples that you will be using.

Reflection

Before consulting your statistician, you will want to answer the following questions and use the sampling tool in the Tools section. Your answers to these questions will influence your state's sampling decisions.

Migrant Groups

The fluctuations in migrant child enrollment during the year are:

- A. ☐ The same for all areas of the state
- B. ☐ Different depending on the region, county, or LOA

Comparing Groups within the State

Are there other differences in the MEP that are relevant for eligibility defect rates or ID&R issues?

- A. ☐ No
- B. ☐ Yes

Do you want to know rates for different groups of the population such as elementary versus secondary students or among geographic regions?

- A. ☐ No
- B. ☐ Yes

Do you want to know whether these rates are significantly different?

- A. ☐ No
- B. ☐ Yes

Do you think non-response issues will be different for different groups?

- A. ☐ No
- B. ☐ Yes

Survey Resources

What method will you use?

- A. ☐ Phone
- B. ☐ In person

Does your state have the personnel to cover in-person interviews?

- A. ☐ Yes
- B. ☐ No

Are your re-interviewers spread throughout the state so that travel costs are not a concern?

- A. ☐ Yes
- B. ☐ No

Will your state want to group interviews by location to reduce interviewer travel time and/or costs?

- A. ☐ No
- B. ☐ Yes

Statistical Resources

What are your state's statistical resources?

- A. ☐ In-house, without extensive survey experience
- B. ☐ Expert staff or consultants

Are your statistical experts knowledgeable about complex sampling problems, sampling weights, and analysis of data from complex samples?

- A. ☐ No
- B. ☐ Yes

Selecting a Type of Sample

The type of sample that you select depends on your answers to the previous questions. Answering B to any question means that your state is more likely to need a complex sampling approach.

This section discusses the most frequently used types of samples. These include:

- 1) Simple samples: **Simple** random samples and **systematic** random samples;
- 2) Complex samples: **Stratified** sampling and **cluster** sampling; and
- 3) **Self-weighting, probability proportional to size (PPS)** sampling: This complex sample functions like a simple sample.

Complex samples and PPS samples are often called *multistage samples*. This means that the sample is established in multiple steps based on the information you have available at each step. Table 9 describes these common sample types and their respective advantages and disadvantages:

Table 9. Types of Sampling

Type	Methodology	Advantages	Disadvantages
Simple random	<ul style="list-style-type: none"> Draws members of the population completely at random (e.g., by assigning and selecting by randomly generated numbers). 	<ul style="list-style-type: none"> Generates a defect rate that is true for the entire population. Often uses the smallest possible sample size. Easy to analyze data and calculate the defect rate. 	<ul style="list-style-type: none"> Cannot be certain that it represents all subgroups. May increase travel costs. Requires a complete universe list at the time the sample is drawn.
Systematic random	<ul style="list-style-type: none"> Draws members of the population using a designated interval (e.g., every third person). 	<ul style="list-style-type: none"> Generates a defect rate that is true for the entire population. Often uses the smallest possible sample size. Can ensure that the sample represents large subgroups by using a sorted list. 	<ul style="list-style-type: none"> Cannot guarantee that the sample includes very small subgroups. May increase travel costs. Requires an up-to-date universe list at the time the sample is drawn.
Stratified	<ul style="list-style-type: none"> Separates the population into groups and draws separate random samples from each group (e.g., groups may be regions or counties). 	<ul style="list-style-type: none"> Generates defect rates that represent all subgroups of your population. No need for a centralized universe list. Can limit the number of interviews in each location. 	<ul style="list-style-type: none"> Requires a statistician to design and draw the sample and calculate the results. May increase statistical costs. May require a larger sample size. May increase interviewing costs.
Cluster	<ul style="list-style-type: none"> This is a sampling process of two or more stages that separates your population into groups and then draws the sample. A statistician draws a random sample at each stage (e.g., a sample of counties and a sample of children within each county). 	<ul style="list-style-type: none"> Generates a defect rate May limit travel costs by reducing the number of interviewing locations. No need for a centralized universe list. 	<ul style="list-style-type: none"> Requires a statistician to design and draw the sample and calculate the results. May increase statistical costs. May require a larger sample size. May increase interviewing costs. May not represent some subgroups if they are not evenly distributed in the state.
Self-weighting PPS	<ul style="list-style-type: none"> This is a sampling process of two or more stages that selects both interviewing locations and children in proportion to their size in the entire population. 	<ul style="list-style-type: none"> Provides easy data analysis and calculation of defect rates. No need for a centralized universe list. Can limit travel costs by reducing interview locations. Has the same lower sample size of a simple sample. 	<ul style="list-style-type: none"> May require statistical help to plan and draw the sample. Will result in doing most interviews in your largest groups. The sample may not represent small groups.

The Easy Samples: Simple Random Sampling and Systematic Random Sampling

Simple random sampling and *systematic random sampling* are the easiest samples to use. These types of random samples are statistically simple because every person has the same probability of being sampled—one chance in the total population. For example, if there are 1,000 children in a given state, each child has a 1-in-a-1,000 chance of selection with these sampling methods.

For these two types of samples, the sampling universe usually consists of the entire child population, and the statistician randomly selects children from the list. In *systematic random sampling*, the statistician selects children in evenly spaced intervals (e.g., every 10th child). In *simple random sampling*, a sampling statistician produces a list of random numbers (e.g., in an Excel spreadsheet) and selects the children on the list that correspond to the random numbers. For example, if the random number list was 54, 6, and 213, the sample would include the 54th, 6th, and 213th children on the list until all of the random numbers on the list had been used. (See Tool 5 on page 86 of the Tools section for a quick way to create a random list of numbers.)

Although simple random and systematic random samples make calculating your defect rate easy, these samples may not necessarily be the most efficient in terms of field operations, and they may involve higher travel costs for in-person interviews.

WARNING: To use the easy samples, you must sample by child and count only the sampled child in the re-interview. Counting all children on a sampled COE, or first selecting a COE and then selecting a child from that COE, is considered a complex sampling method.

The Complex Samples: Stratified and Cluster Samples

A complex sample happens whenever individuals have different chances of being sampled. In this case, some children would have higher chances of selection whereas others have lower chances. This difference is typically the result of including *clustering* or *stratification* in the sample design. Clustering separates the population into groups and draws separate random samples *of each group*. For example, a statistician randomly selects a subset of counties and then selects a sample from each selected county. Stratification separates the population into groups and draws a random sample within each group. Another example is dividing the state's child population into age groups and drawing a sample of children *within each group*.

Statisticians must account for the different probabilities of being sampled when analyzing the data. They use *sampling weights* to ensure that the data from each sample member are counted correctly in the results. The method is complex, but the concept is similar to calculating a weighted average. There is a more detailed explanation of sampling weights in Tool 15 (page 105) of the Tools section. One disadvantage of sampling weights is that they can increase the standard deviation, which means that the sample has less precision than simpler samples. This means that you may also need to use larger samples when you stratify or cluster your sample.

When working with complex samples, you must select the structure of the design and allocate interviews to the components of the design. This guide covers *ways to allocate interviews* after discussing the types of designs.



Consider This

Any time you deviate from simple or systematic random sampling AND you want to produce a population estimate (e.g., a defect rate), you are introducing complexity that requires a statistician familiar with complex samples, sampling weights, and data analysis. These techniques generally require specific types of graduate-level training. Not every statistician can do this type of work.

Stratified Sampling: Stratified samples allow groups to be treated differently. States can use this method when they want to sample differently for different groups. In stratified samples, the sampling universe is divided into groups called *strata*. These groups could be age groups, counties, language groups, or other factors that are important to use in sampling. The groups must include all the members of the sampling population.

Stratified sampling could be used in several ways. Stratified sampling helps ensure that enough interviews are collected from each group that will be compared. For example, to compare defect rates among LOAs, you need to make sure that you get enough interviews from each LOA to perform the comparison.

Stratified samples also ensure the inclusion of small subgroups. For example, if most migrant children are concentrated in the eastern part of your state, you may want to confirm that there are enough interviews from children in the western part of your state.

Stratified samples help when you do not have a centralized sampling list. For example, the interviews can be divided among counties and then the county samples can be drawn independently from lists obtained in each county.

Finally, stratified samples can reduce the number of interviews within large subgroups. For example, if you want to complete 30 interviews in each county, proportionately fewer interviews will be completed in large counties and proportionately more interviews in small counties.

Cluster Sampling: As the name implies, this form of sampling clusters the interviews in a few locations. Statisticians usually do cluster sampling in two stages. In the first stage, the statistician might select a few counties in which to cluster the interviews, and in the second stage sample children within each selected county. With this method, children have different chances of inclusion in the sample. Their county has a chance of selection, and they have a chance of selection within their county. Thus, children from different counties will have different probabilities of being in the sample.

The benefits of cluster sampling are that it can limit travel costs and it does not require a centralized sampling list.

One caution is that when cluster sampling is used, there is a risk of missing some groups. If the causes of your errors or the key groups of children are not distributed evenly across the state, cluster sampling has a higher chance of missing these groups altogether. For example, if you cluster your interviews are clustered by county, and thus select only some counties, you might miss a county or district that has a different migrant population.

An Intermediate Approach: Self-Weighting PPS Sampling

Self-Weighting Probability Proportional Size Sampling (PPS) has a few things in common with complex sampling. However, in PPS sampling, all individuals have the same chance of inclusion, so sampling weights are not needed.



Bright Idea

There are ways to make simple samples produce some of the benefits of complex samples. For example, if you are considering using a complex sample to ensure that all geographic areas are included, a systematic random sample can be used instead. To do this, the list can be sorted by geographic region and children ordered randomly within geographic regions. If every 10th or 150th, or 2,000th child on the list is selected and there are more than 10, or 150, or 2,000 children in each region, every region will still be represented. This technique also results in doing more interviews in larger areas and fewer in smaller areas.



Bright Idea

You can get some of the benefits of a stratified sample but still have the ease of calculation of a simple random sample. First, sort your universe list by the feature used for stratification (e.g., county, language group). Next, choose your sample at evenly spaced intervals (e.g., every 10th child on the list).

PPS sampling is one method of limiting the number of locations that the interviewers need to travel, while avoiding the need to use sampling weights. With PPS, a multistage sample is used but no sampling weights. There is no need to visit all geographic regions in the sampling universe, nor is a centralized sampling list needed. However, the number of migrant children enrolled in each county or district must be known. PPS sampling requires a statistician to ensure that the sampling is correct, because making a mistake may require the use of sampling weights.

Interview Allocation for Complex Samples

In complex sampling plans, once the subgroups of interest are selected, they need to be assigned a number of interviews. There are usually two ways to do this. One way is to allocate the interviews proportional to the size of the group; the other is to use a quota for each group.

Proportional allocation means that the number of interviews is proportional to the size of the stratum or cluster. For example, if the cluster contains 20 percent of the population in the sampled counties or regions, 20 percent of interviews should be completed in that cluster. One advantage is that this method can limit the need for weighting. The disadvantage is that many interviews in large strata or clusters may be required.

Using quotas means that you allocate interviews in a way that is not proportional. For example, you might allocate 60 interviews to each cluster, strata, or county. One advantage is that you reduce the number of interviews in large counties or districts. The disadvantage is that you must use sampling weights.

Planning for Non-response

Another factor to consider in selecting a sampling design is non-response. Non-response occurs when someone on the sampling lists is unavailable or refuses to participate in the re-interview. Your state's sampling plan should take into account how many people are likely to refuse and how many may not be found.

Non-response affects the final number of completed interviews, and this number in turn affects the precision and accuracy of your defect rate. The Data Analysis section of this guide discusses ways to handle non-response in constructing a defect rate.

Take all reasonable steps to reduce non-response. Tool 7

(page 89) in the Tools section includes steps that reduce non-response. Also, consider the following suggestions:

- ✓ Make multiple attempts to contact sampled families. Three attempts are considered the minimum for in-person interviewing, but ten attempts are more typical by phone.
- ✓ Implement re-interviews during times of the day when the respondents are home.
- ✓ Implement re-interviews during times of the year when the migrant population is present.
- ✓ Ensure that your re-interviewers have the language and cultural skills needed to make your respondents feel comfortable.

Your state needs a plan for obtaining the full, required sample size, even though there may be non-response. This section describes two common ways of accounting for non-response in the sampling design: *over sampling* and *replacement sampling*. If neither approach is appropriate, other methods of selecting replacements exist, so



Bright Idea

Planning for non-response when creating your sample and when performing your re-interviews helps ensure that your state's defect rate is accurate and reliable.

Imagine that you need to obtain 350 re-interviews to achieve a ± 5 percent confidence interval at the 95 percent confidence level and that you pull a sample of exactly 350 children. If 90 of the children cannot be located, you can only complete 260 interviews. In this case, either your confidence interval will be larger or you will have less confidence that the true value is in the confidence interval and you will not be in compliance with OME's retrospective re-interview requirements.

consult with your statistician. The sampling statistician must consider how the replacement sampling method might affect the sampling weights.

When you *over sample*, more people are deliberately included in the sample than are intend to be interviewed. This approach works well if the non-response rate can be easily estimated. If your state needs a sample of 350, for example, and it is known from experience that about 10 percent of the sample chosen (35 people) will not respond, setting the sample size for 385 people should increase the likelihood that the 350 respondents needed, will be interviewed.

WARNING: When over sampling, all the children selected generally need to be interviewed, even if the desired sample size is reached before all of the interviews are finished on the sampling list. This is particularly true when using a structured random sample. When using a simple random sample, there are some situations when you may stop before the end of the list; however, you would need to consult a statistician first. ***When in doubt, complete the list.***

Replacement sampling involves using a randomly sampled replacement to take the place of anyone in the sample who is unavailable. There are various ways to do this, such as randomizing the entire sampling list or using multiple sampling lists. Both methods work when you are unsure how many replacements your state will need.



Bright Idea

One way to use the multiple list method is as follows: When you sample, draw three simple random samples of your target sample size instead of one. You will then have three lists: List A, List B, and List C. List A is your main sampling list. If someone on this list cannot be found (e.g., the 17th person), use the corresponding person (the 17th) on List B. If that person cannot be found, then use the 17th person on List C.

Selecting a Sampling Plan

There are many different ways to sample and many factors to consider. How do you know which one is best for you? Consider your answers to the questions at the beginning of the section and review them in light of the advantages and disadvantages of sampling. The primary factors that determine the type of sample selected will be your state's resources and the characteristics of your state's migrant population. The sampling tools in this guide will assist you in identifying the types of samples that may be more appropriate (see the Sampling Decisions Worksheet in Tool 2 on page 81 of the Tools section). These questions and tools will help you consult with your statistician so that together you can determine your state's best options. You will likely have a choice of sampling options that meet the re-interviewing standards, and you will need to consider the tradeoffs to determine the best option. Consider the following examples:

- ✓ Your state is large and traveling to local sites is expensive. So, you decrease travel costs by using a PPS sample or a complex sample, with the understanding that your state may need to spend more on professional statistical assistance or to increase the sample size.
- ✓ Your state has limited statistical resources and wants something simple. At the same time, your state needs to ensure statewide coverage because the migrant population varies greatly from region to region because of climate and crop patterns. You try a systematic sample using a sorted list to ensure coverage. The drawback is that some large regions will have many interviews in those regions.
- ✓ Your state has a summer-only program and needs to collect all the re-interviews in a very short period. In addition, your remote sites cannot enter all their data in time for you to have a complete, centralized child universe to use for sampling. In this case, the best approach may be a snapshot sample using complex sampling. First, select locations, which you do know, and then select children from locally obtained enrollment rosters at each site.

For each situation, the suggested solution is just one of several approaches that can accomplish the objectives. Therefore, it is best to make sampling decisions in consultation with a statistician familiar with the state's unique goals and migrant population.

Sample Size

The sample size depends on several things: 1) the number of children in the sampling universe, 2) how accurate the rate or child count should be (the desired precision), 3) your most recent defect/discrepancy rate, 4) the type of sample design you use, and 5) the expected non-response rate. Once these issues are evaluated, you can determine the size of the sample your state needs.

Bright Idea

When you use a simple random sample, instead of drawing a fixed number of people randomly, you can sort the entire list in random order. To do so, assign each person on the list a random number and then sort by these random numbers. Then, simply go down the list in the sorted order until the sample size desired is obtained. For example, when you want to get 350 people, begin by interviewing the first 350 people on the list. If, at that point, some people were missed and you need more re-interviews, start with the 351st person and keep moving down the list.

To make the randomized list more manageable, break it into chunks. This may save travel dollars and can simplify the process of setting up interviewer assignments. For example, select the first 350 names on the list and agree to contact all of them. Then, reorganize the list by geographic area. You can then assign each interviewer a list of migrant families who live in one area. When you complete the first chunk, if you have not reached the desired sample size, you can take another chunk (such as the next 100 names) and repeat the procedure.

Size of Sampling Universe

Although the size of your population influences the sample size to some extent, it has a much smaller effect on the required sample size than the other issues discussed here. Small and large states with the same defect rate and desired precision for their defect rate will need to draw samples of almost the same size. See Table 10 on the next page for examples of states with different sizes and historic defect rates.

Desired Confidence

A key issue to consider is the confidence that you can have in your state's defect rate. How sure will you be that the defect rate from your sample will reflect the defect rate for all children in your state's child count?

Statisticians use a *confidence level* and a *confidence interval* to express the probability that your sample reflects the population. A confidence interval is a range around a value often expressed as +/- a certain size. For example, OME asked for a confidence interval of +/- 5 percent for the 2004-2005 retrospective defect rate survey.

The confidence level measures the likelihood that the survey results match the actual results for the population. For example, the desired confidence level of the 2004-2005 retrospective eligibility defect rate was 95 percent. This meant that the true value of a state's defect rate would be inside the confidence interval 95 percent of the time. For example, if a state had a defect rate of seven percent, there is a 95 percent chance that the true rate—that is, the rate for all migrant children in the state, not just the migrant children in the sample—would fall into the +/- 5 percent confidence interval around seven percent or somewhere between two and 12 percent.

As required by the regulation at 34 CFR 200.89(b)(1), the level of precision for retrospective re-interviewing is at a 95 percent confidence level with a confidence interval of plus or minus 5 percent.. Although your state's confidence interval may not be larger than that required by the regulation, you may want to have one that is smaller. In general, the smaller the confidence interval is for a particular confidence level, the more accurate the rate and the larger the sample size.

Your Existing Defect Rate

The size of your defect rate will also affect the size of the sample. In general, the more extreme the rate, the smaller the sample size needed for the same confidence interval. If your defect rate is 50 percent, you need a larger sample size than if you have a very low rate of three percent or a very high rate of 97 percent.



Bright Idea

Use the information from your state's documented defect rate to determine the sample size more precisely. This may reduce the number of interviews needed.

States now have information on their defect and discrepancy rates that you can use in determining the sample size. It is best to be conservative when estimating sample size. Even if your most recent defect/discrepancy rate included a large enough sample to ensure it was accurate within +/-5 percentage points, you may want to either round your defect/discrepancy rate up or use a higher defect/discrepancy rate. This is because the sample calculators assume the rate you provide is exact. If you tell the sample size calculator that you have a rate of 6 percent (based on your state's last re-interview process), but then in your current process find a defect rate of seven percent, your state's sample size will be too small to provide the precision you need. If you add five percentage points to the rate from the earlier re-interviews, you will account for the fact that your historic rate is only accurate within +/- 5 percentage points. Add a few more percentage points if you are still nervous or if your state's last re-interview process did not get the sample size needed for the level of precision desired.

The expected defect rate has a much larger impact on your sample size than the size of the population to be re-interviewed. Table 10 shows how the minimum sample size changes with the expected defect rate and population.

Table 10. Sample Size for a Simple Random or Structured Random Sample

Prior Defect Rate	Minimum Size for Each Subgroup +/- 5% at the 95% Confidence Level			
	Population Size			
	2,000	5,000	10,000	20,000
5% or 95%	71	72	73	73
10% or 90%	130	135	137	138
20% or 80%	219	234	240	243
30% or 70%	278	303	313	317
40% or 60%	311	343	356	362
50%	322	357	370	377

Sample Design

The fourth factor in determining the sample size is the type of sample design selected. The information on sample sizes and confidence intervals is based on simple random sampling. Complex samples sometimes need to use a larger sample size. You will need an experienced statistician for this.

If you want to compare defect rates among groups within your state, a larger sample size will be needed and you should consult a statistician.

Expected Response Rate

The final factor that affects sample size is the response rate. The accuracy of the rate depends on the final number of interviews done—not on the number of interviews planned. If you need 400 interviews and a response rate of 80 percent is expected, you need to draw a sample of 500 interviews to end with a sample size of 400 interviews.



Consider This

Carefully consider your sample size. Having too many interviews is much more desirable than having insufficient interviews. If costs allow, overestimate your sampling size to allow for the unexpected. Remember that fixing the problem of having too few interviews can be much more costly than the upfront expenditure of a few extra interviews.

Calculate Your Sample Size

For complex samples, a sampling statistician is needed to calculate the sample size. For simple samples and PPS samples, however, statistical calculators on the web can help. Generally, the first step is to enter some of the information discussed previously – the desired precision, existing defect rate and population size – into a sample size calculator. Once you have the sample size needed, adjust it for non-response using your probable response rate. A step-by-step example of how to use a sample size calculator, and the web address for the calculator used in the example, is provided in Tool 4 (page 85) of the Tools section.

Write the Sampling Plan

The last stage of the sampling design process is to create a written document that describes the sample. A statistician will probably need to prepare the document, particularly if your state's sampling design is complex. The written sampling plan does not have to be elaborate, but it should describe your state's sampling plan, explain your state's decisions, and show how the sampling plan meets the standards at the beginning of this section. Producing the written sampling plan provides documentation for what your state plans to do, helps your state work through the decisions needing to be made, and provides reassurance that the plan meets the standards. Tool 6 (page 87) in the Tools section includes a template for producing a written sampling plan.



Bright Idea

To determine sample size, use your state's response rate from last time or, in some cases, carefully adjust it. One strategy is to use the old response rate as a safe outside estimate and then use your state's new response rate to plan future sampling.

However, you might want to adjust the response rate if the conditions change. For example, interviews may have previously been conducted when children were unavailable and this time you plan to sample on occasions that capture the population better. In this case, you can adjust up the response rate but you must be very careful.

While a previous response rate serves as a starting point, always be prepared to adjust it based on new information. If you think, for example, that conditions for the next round of re-interviews will be more difficult for any reason, reduce the expected response rate and increase the estimate for the non-response rate.

Prepare for Re-interviewing

Jump Start

Once you have decided on your sampling strategy, it is time to get ready for your re-interviews.

- ✓ Develop your data collection strategy;
- ✓ Develop your re-interview form; and
- ✓ Recruit, train, and test your re-interviewers.

Plan Data Collection with Your Respondents in Mind

When planning for re-interviewing, remember that many migrant workers may not respond to your re-interviews in the ways expected. Many migrant workers are polite and cooperative when being interviewed. Out of politeness, they may try to give the answers they think the interviewer wants to hear. Even though they may not refuse the re-interview, the workers may have concerns about getting themselves or the original recruiter in trouble. In addition, they may find the re-interview process intrusive or intimidating.

In the beginning of this guide, you considered how your state wanted to interact with families, whether the original recruiter would introduce the re-interview process, and whether the focus would be on the family, the recruiter, or ID&R process improvement. In addition to your answers to those questions, the following suggestions will help you obtain the best information possible from your state's families.

- ✓ Use culturally competent interviewers who are experienced with working with migrant families. They should speak the language, understand the work, and understand migration patterns.
- ✓ Create as relaxed and friendly an atmosphere as possible. Consider an introduction in some form from a MEP staff person or someone from the district, without having either one be present during the interview. However, remember that your efforts to make the family comfortable and answer frankly (e.g., having members interviewed by someone they know) may not be the same as what you would do to eliminate the potential for prepared answers, interference, and coaching (e.g., from the original interviewer or local school district).
- ✓ Establish rapport with families. Ask about their work or about the condition of the harvest. Establishing a connection between the recruiter's background and that of the family can help. Focus the interview on what the family told the recruiter, and elicit information as much as possible in a story framework.
- ✓ If your state has incorporated the re-interview into your ID&R process, remind families that the initial recruiter told them there might be a second interview. Apologize for the intrusion.
- ✓ Leave information written in the family's primary language that explains the re-interview and provides a phone number to call if there are questions.
- ✓ If families may lose access to services because of the re-interview, let them know in a non-threatening manner.

Develop Your Re-interview Form

Jump Start

The interview form is a critical part of the re-interview design. It should be complete, easy to use, and easily understood by families and by the interviewer. See the sample interview forms in Tool 9 (page 96) of the Tools section. Be sure to tailor these samples to your state's needs.

To begin designing the interview form:

- ✓ Review your state's ID&R manual;
- ✓ Review the relevant federal regulations and guidance;
- ✓ Review the samples in the Tools section;
- ✓ Consider the information you need to collect;
- ✓ Consider the sample timing;
- ✓ Consider the type of interviewing (i.e., monitoring or defect rate determination);
- ✓ Develop items to address your information needs;
- ✓ Include an introduction on your form;
- ✓ Use appropriate types of questions for each data item;
- ✓ Pilot test your data collection instrument using your re-interview protocol. Try to approximate actual field conditions; and
- ✓ Modify your instrument based on your pilot test.

Interview Form Introduction

Include an introduction on your interview form to help the interviewer explain the survey to the respondents. The precise wording of your introduction should explain the re-interview process, including how the respondents were chosen for the process. Tailor this explanation to your state's process, and include references, if possible, to the original interview. For example: "Last year, one of our recruiters, Maria Lopez, spoke with you. Maria may have mentioned to you that we conduct periodic re-interviews as part of our quality control processes. Your family has been selected to be re-interviewed."

Ensure a Complete Interview Form

Your interview form should include all the information that your state needs to make an eligibility re-determination. OME guidance provides information on what should be included. You will also want to consult with your state's ID&R staff and manual to ensure that all the elements of your state's eligibility process are included. Some states complete a new COE, whereas others include only key information on the re-interview.

Remember that, at a minimum, your state should be able to assess, *independent of the original interview*:

- ✓ The identity of the child (e.g., Is this the same child who was previously determined eligible?);
- ✓ The age of the child at the time of the move;
- ✓ Whether the child had already completed high school or earned a GED at the time of the move;
- ✓ If the family moved in order to seek or obtain work in agriculture and/or fishing;
- ✓ Whether the worker was to be employed in this work on a temporary or seasonal basis;
- ✓ If the child moved with the qualifying worker or if the child joined the worker within the allowed period;
- ✓ Where the family resided before they moved;
- ✓ Where the family resided after they moved;
- ✓ If the move was from one school district to another;
- ✓ If the move was due to economic necessity; and
- ✓ If the move occurred no more than 36 months prior to the date of recruitment.

Question Methods

Use a mix of checkbox items and open-ended items for the eligibility decision criteria questions. The checkbox items allow for clear documentation that the criteria were met. The open-ended items provide backup information to justify the decision. Re-interview questions are provided in Tool 9 (page 96) of the Tools section.

Here are some examples of open-ended and close-ended questions for asking about a family's move:

Determining a Move:

Open-Ended Example: What were the dates of the moves? _____

Closed-Ended Example: Did you move looking for work in agriculture or fishing in the last three years? ☐ Yes
☐ No

Move Details:

Open-Ended Example: Where did you move from? City _____ State _____, Country _____

Open-Ended Example: Where did you move to? City _____ State _____, Country _____

Closed-Ended Example: Was one of the moves in the last three years across school district boundaries (or at least 20 miles in the case of Alaska)? ☐ Yes ☐ No

Develop an Effective and Efficient Data Collection Strategy



Jump Start

A good data collection strategy should be both *effective* and *efficient*. An *effective* data collection strategy is one that allows your state to minimize non-response and to collect complete and accurate answers that meet your state's needs within the time available. An *efficient* data collection strategy allows your state to spend as little time, money, and other resources on data collection as possible. An inexpensive, easy data collection strategy that does not collect timely, accurate data is not effective or efficient. Conversely, an expensive and time-consuming strategy does not guarantee an effective or efficient data collection. The following steps will help you get started:

- ✓ Review the standards that apply to data collection;
- ✓ Create a data collection plan;
- ✓ Pilot test your data collection process;
- ✓ Adjust your data collection plan based on the results of your pilot test;
- ✓ Recruit your re-interviewers;
- ✓ Train your re-interviewers;
- ✓ Test your re-interviewers; and
- ✓ Manage your data collection process.



Standards

To collect data effectively and efficiently, become familiar with the standards for obtaining data from families. On the next page, Table 11 lists the three standards that apply:

Table 11. Criteria and Standards for Obtaining Data from Families

Criterion	Acceptable Standard
Re-interviews are conducted systematically and in an approved way.	The state uses face-to-face re-interviews or a predetermined combination of face-to-face and phone re-interviews, and makes efforts to either match the initial interview type or provide data on the comparability of face-to-face vs. phone interviews for its population.
Re-interview instrument is complete and unbiased.	The state uses a re-interview protocol that contains all items used in making the original eligibility determination. The protocol, including both items and additional probes, has been pilot tested with migrant families similar to those being re-interviewed.
Re-interviewers follow procedures to gain the trust of the families.	The state lets families know about the re-interview processes during the original interview; uses interviewers and re-interviewers who can communicate comfortably with the families; and ensures that the interview protocol is not intentionally or unintentionally threatening or harmful to the family. Re-interview protocols include appropriate informed consent.

Reflection

What are your state's data collection resources? What type of information does your state need?

Your answers to these questions will influence your state's data collection planning decisions and familiarize you with the criteria for good data collection. Remember that no matter how efficient your state's data collection process is, if the information it generates is not good it is not an effective process. The following checklist will help you answer these questions.

Resources (Time, Money, and Personnel)

When do you need to start re-interviewing? _____

By when do you need to finish? _____

What external deadlines do you have from OME? _____

When is your population most available? ☐ Summer ☐ School Year ☐ Other _____

Do your deadlines allow you to conduct your interviews during migrant population peaks? ☐ Yes ☐ No

Do you have/can you find qualified, independent re-interviewers who are available during your re-interview timeframe? ☐ Yes ☐ No

Do you have the financial resources to contract out for services? ☐ Yes ☐ No

Do you need to use in-kind/in-house resources? ☐ Yes ☐ No

Information Type

For what groups do you need to generate defect rates?

☐ Specific counties ☐ Regions ☐ Recruiters ☐ The entire state

Do you need information about the identification and recruitment process? ☐ Yes ☐ No

Criteria for Collecting Good Information

Is the information on the interview form complete (e.g., no items are missed, all checkboxes are filled, and all answers are clear)? ☐ Yes ☐ No

Is the information detailed (e.g., Open-ended items are completed with enough information that a reader can understand the content of the interview)? ☐ Yes ☐ No

Is the information legible? ☐ Yes ☐ No

Is the information verifiable (e.g., If you were to ask the respondent whether his or her answer is reported correctly, he or she could tell you)? ☐ Yes ☐ No

Is there enough information to make an eligibility determination without relying on additional sources or asking follow-up questions? ☐ Yes ☐ No

Effective Data Collection Strategies

Consider these ideas for *effectively* collecting information:

- ✓ Pilot test your instrument! Do this with your population, in the language(s) you will be using, and under the conditions you expect.
- ✓ Take steps to reduce non-response (see Tool 7 on page 89 of the Tools section).
- ✓ Hire qualified re-interviewers who speak the language(s) of, and have worked with, your migrant population.
- ✓ Train your data collectors to complete your re-interview protocol correctly and consistently.
- ✓ Monitor your data collection closely, and check (or have your contractor check) re-interviewer data quality regularly.
- ✓ Address data collection and recording problems as they occur. If you need to follow up with respondents, do so quickly after the interview so that their memories are fresh.

Efficient Data Collection Strategies

These ideas may help you collect your state's data *efficiently*:

- ✓ For retrospective re-interviewing, use your state's most recent known discrepancy rate, or if this is not available, the established defect rate when determining the sample size needed. The lower the defect rate, the smaller the sample size needed.
- ✓ Use the simplest sampling approach that will meet your state's information needs. (See Tool 2 on page 81 of the Tools section.)
- ✓ Know the key moving dates for your migrants and re-interview as soon after the original interview as possible. Or sample using a rolling re-interview approach (for retrospective re-interviewing). Needing to find people or to visit multiple households for one re-interview requires a lot of time.
- ✓ If you have limited resources and need to do phone interviewing, do a pilot study (see pilot testing below) to determine whether it can be effective in your state with your population.
- ✓ Make sure your re-interview instrument incorporates checkboxes that allow for clear and easy eligibility determinations.
- ✓ Have someone on-call to answer re-interviewer questions in real time. Having to return and find families to resolve interview issues is not efficient.

Pilot Testing Your Data Collection Protocol

The final stage in developing your state's data collection plan is pilot testing your data collection tools and protocols. In a pilot test, which happens before the instrument is used on your real sample, you try collecting data on a small sample of individuals who are like your respondents. Pilot testing your data collection helps smooth out the bumps before real data collection begins and allows problems to be identified and resolved with your state protocols before re-interviewing begins.

Jump Start

There are several ways to do the pilot test. The best methods try to re-create the conditions of the actual interview by using experienced interviewers. If you are doing in-person re-interviews, send one or more experienced interviewers to at least five, and as many as 15, families and instruct them to perform the interview using your introduction script, processes, and guide. For phone interviews, have one or more experienced interviewers call at least ten, and as many as 15, families to perform the interview, again using your introduction script, processes, and guide. You will also want to visit at least five of these families to determine whether the answers they give by phone are similar to the answers they provide in person. Based on the pilot test, alter question wording and order to make your instrument work as effectively as possible for your population.

When carrying out pilot testing, include the following steps:

- ✓ Let the families know that this is a pilot test of your interview and that you want to be sure that the questions are clear.
- ✓ Have your re-interviewer use the re-interview protocol as it is written and time how long it takes to complete.
- ✓ Once he or she has completed the entire re-interview, have the re-interviewer check the answers against the family's original COE.
- ✓ Have the re-interviewer check with the respondent for the following issues:
 - If the respondent found any of the questions difficult to answer or confusing, then record responses to determine whether the problem is a unique occurrence or a trend indicator.
 - If the respondent appeared to have difficulty answering any questions, follow up with clarifying questions such as, "It seemed as if you were having trouble with question _____. What were you considering when you were answering that?"
 - If the respondent's answers are not internally consistent or do not make sense, follow up with clarifying questions such as, "When I asked you whether you moved to seek agricultural work you said 'yes,' but when I asked you what kind of work you were seeking you said that you were looking for work in construction. Can you tell me a little bit more about the kind of work you were looking for when you moved?"
 - If the answers are inconsistent with the original COE, which the re-interviewer may review following the re-interview, follow up with clarifying questions such as, "When Maria Lopez spoke with you last month, she recorded that you were employed planting tomatoes, and here it says that you are working with potatoes. Can you tell me a bit more about this?"
- ✓ Debrief the interviewers after the interviews are done to discover how the protocols and instruments functioned. Did the introduction put families at ease? Were interviewers able to follow the protocol? When did confusion arise? What could have been done better? Experienced interviewers are usually good at spotting problems with data collection protocols.
- ✓ Score the pilot interviews and make eligibility determinations for each one. This will tell you if your instruments provide correct information and enough detail to determine eligibility. Imagine how bad you would feel if, after working hard to collect your data, you realized that you did not have the data you needed!

Recruit, Train, and Test Your Re-interviewers

Jump Start

It is important to put time and consideration into the recruitment and training of re-interviewers. They need to focus on collecting the most complete, fair, and accurate information possible, given time and instrumentation constraints. They are your state's frontline data collectors and can exert a powerful influence on the quality of the information gathered. The following will help you decide where you need to start:

- ✓ Review the standards that apply to obtaining data from families;

- ✓ Establish any known conflicts of interest during the recruitment of re-interviewers;
- ✓ Find re-interviewers who can establish a good rapport with families;
- ✓ Develop a training guide specific to your state's data collection process; and
- ✓ Implement the training, and test the re-interviewers on your data collection process.



Standards

To recruit, train, and test your re-interviewers appropriately, become familiar with the standards for practices for ensuring re-interviewer independence and skills. Table 12 lists the six standards that apply. Remember, you must use independent re-interviewers for retrospective re-interviewing.

Table 12. Criteria and Standards for Ensuring Re-Interviewer Independence and Skills

Criterion	Acceptable Standard
Re-interviews are independent of original interviews.	The state ensures, at a minimum, that re-interviewers are not SEA or local operating agency staff members working to administer or operate the MEP in any capacity. And re-interviewers did not carry out the original interviews nor have any knowledge of the content of the original interviews.
Re-interviewer conflicts of interest are known and addressed.	The state addresses the conflicts of interest that it discovers.
Re-interviewers have the needed linguistic capabilities.	The state makes an effort to match interviewers' language proficiencies to the language of the parents they interview.
Re-interviewers have the necessary population knowledge.	The state makes an effort to select interviewers who have knowledge of and experience with migrant populations.
Re-interviewers have training and guidance.	All re-interviewers receive detailed training regarding the eligibility requirements, the purpose of the re-interviews and the re-interview instrument.
Re-interviewer collects data accurately.	All re-interviewers are tested and/or observed during actual or practice interviews to ensure they are applying the protocol correctly.

Recruit Your Re-interviewers

The re-interviewer should focus on collecting the most complete, fair, and accurate information possible, given time and instrumentation constraints. Using independent re-interviewers who have no known conflicts of interest helps ensure this. For this reason, OME requires the use of independent re-interviewers for retrospective re-interviewing.

The following are some examples of conflicts of interest:

- ✓ Knowing the answers families gave in their original interviews;
- ✓ Having knowledge of the families and their circumstances;
- ✓ Wanting to preserve the original interviewer's reputation for accurate data collection;
- ✓ Overseeing the state's or LOA's ID&R system;
- ✓ Supervising the recruiters responsible for determining eligibility;
- ✓ Administering the state's or LOA's MEP;
- ✓ Having a stake in raising or lowering the state's recorded defect rate; and



Bright Idea

If you think that hiring outside re-interviewers is the way to go, consider pooling resources with another state (or group of states) to hire a team of consultants/independent re-interviewers who will do re-interviews across states. If considering this option, form up-and-down stream alliances to take advantage of your state's peak migrant seasons.

- ✓ Holding opinions about the desirability of enrolling more/fewer children in the state MEP.

It is also important that re-interviewers can gain the trust of, and clearly communicate with, the respondents. Using re-interviewers who possess the language skills and cultural knowledge to reach your migrant population increases the effectiveness and efficiency of your interviewing by:

- ✓ Providing respondents with a re-interviewer with whom they feel comfortable;
- ✓ Helping ensure that respondents' answers are accurately represented;
- ✓ Ensuring that the re-interviewers understand and record what the respondents say explicitly;
- ✓ Ensuring that the re-interviewers ask enough questions to resolve any questions raised by the respondents' responses (e.g., asking questions to distinguish if a worker's move was for vacation purposes or for temporary agricultural work); and
- ✓ Ensuring that re-interviewers are likely to obtain similar answers as your original interviewers. (This is assuming that the original interviewers speak the languages of your population and have knowledge of your state's migrant population.)

There are many different potential sources of independent re-interviewers. Table 13 reviews some of these sources, and their advantages and disadvantages.

Table 13. Advantages and Disadvantages of Types of Re-interviewers

Source of Re-interviewers	Advantages	Disadvantages
Retired ID&R specialists from your state	<ul style="list-style-type: none"> • Already trained in ID&R issues. • May be linguistically and culturally competent. 	<ul style="list-style-type: none"> • If they have only recently retired, may still remember some of the families from earlier work. • May have conflicts of interest/an investment in seeing a lower defect rate.
Retired teachers/educational specialists from your state (experienced in working with migrant populations)	<ul style="list-style-type: none"> • Knowledge of your state's migrant population. 	<ul style="list-style-type: none"> • Not trained in ID&R issues.
Retired MEP staff from your state	<ul style="list-style-type: none"> • Likely already trained in ID&R issues. • May be linguistically and culturally competent. 	<ul style="list-style-type: none"> • May have conflicts of interest/an investment in seeing a lower defect rate.
Independent consultants who specialize in migrant issues	<ul style="list-style-type: none"> • Knowledge of migrant population. • May be linguistically and culturally competent. 	<ul style="list-style-type: none"> • Likely not trained in ID&R issues.
ID&R specialists from other states	<ul style="list-style-type: none"> • Likely to be truly independent and without conflicts of interest. 	<ul style="list-style-type: none"> • Likely more costly than other groups. • May not have knowledge of your state's population and issues.
Universities (professor-led student groups)	<ul style="list-style-type: none"> • Likely more affordable than consultants. • Likely to be truly independent and without conflicts of interest. 	<ul style="list-style-type: none"> • Limited population knowledge and language skills. • Limited availability (may have to do the work on their own schedule.) • May limit your access to the data. • Likely not trained in ID&R issues.
Individual independent consultants	<ul style="list-style-type: none"> • Likely to be truly independent and without conflicts of interest. 	<ul style="list-style-type: none"> • Likely more costly than other groups. • May not have knowledge of your state's population and issues.
Independent consultants or university groups shared across multiple states.	<ul style="list-style-type: none"> • Likely to be truly independent and without conflicts of interest. • May be less costly than other consulting arrangements. • Training can be provided one time, limiting per-state startup costs. 	<ul style="list-style-type: none"> • Need to coordinate hiring and timing with other states. • May have timing conflicts if other states have a similar migrant schedule.

Train and Test Your Re-interviewers

Even for experienced re-interviewers, training and testing are important for obtaining valid and reliable results. A sample training agenda and checklist are provided in Tool 8 (page 90) of the Tools section. At a minimum, training should cover:

- ✓ The purpose of the re-interviews (use the information you considered on page 48);
- ✓ The criteria that need to be met for a child to be eligible (see page 61);
- ✓ Any issues or special circumstances specific to your state that make eligibility determinations difficult (e.g., subsistence fishing in Alaska, trends in vacation moves in your state);
- ✓ Your state's sampling approach;
 - The number of interviews your state needs to meet the desired sample size;
 - Any populations of special interest or populations that were used to stratify or systematize your sampling (i.e., to provide background for training on certain interviewing issues. Occasionally this information may be withheld if there is concern that such knowledge may bias the re-interviews or if this information is sensitive, but overall, the more the interviewers understand the more seriously they take the process);
 - The sampling lists that the re-interviewers will be using; and

- ✓ The re-interview protocol, including:
 - How to use the sampling lists and what order to interview the families (it is always nice to give the interviewers a list in the order that families should be contacted);
 - Materials to have ready before the interview;
 - Safety concerns when doing face-to-face interviews;
 - How to make contact with the selected family;
 - How many times to attempt to contact a family;
 - Who is an acceptable re-interview respondent (Ideally you talk to the person who was originally interviewed, but is another parent, guardian, close family member, roommate acceptable? What are the tradeoffs between losing a response and collecting possibly less accurate information?);
 - How to introduce yourself and the purpose of your re-interview;
 - How to encourage response (Assure families that this data collection serves to double-check the ID&R work and does not imply that their original answers are being questioned. Let them know that they were picked at random. Tell them how important their answers are in helping you serve other migrants in the state. At the same time, give families accurate information about the potential outcomes of the re-interview.);
 - How to conduct the re-interview itself;
 - How to make an eligibility determination (if this is part of your re-interviewer's job);
 - How, where, and when to return re-interview forms;
 - What to do if families are not home ;
 - What to do if families have moved;
 - How to document attempts and track response rates;
 - How to ask questions that are open-ended and avoid leading questions; and
 - In the event of an emergency, who to contact and how to do it.

Re-interviewer Testing

Several options are available for testing re-interviewers to ensure data quality. Testing will determine whether your training worked and whether re-interviewers are following the protocols. Remember that you will likely want to test less experienced re-interviewers in greater depth. However, *all* re-interviewers should be tested to ensure that they understand the specific re-interview protocol the SEA uses and can follow it correctly. Consider one or more of the following testing methods, depending on your re-interviewers' level of experience:

- ✓ Observe your re-interviewers doing role-play exercises during training;
- ✓ Ask each re-interviewer to walk through the protocol with a trainer;
- ✓ Develop a short quiz on the key points of your re-interview protocol;
- ✓ Observe your re-interviewer performing the protocol on practice families (e.g., families who have graduated the program or who you know are willing to help); and
- ✓ Observe your re-interviewer performing one of his or her first actual interviews. However, be aware that if the re-interviewer deviates substantially from the protocol and asks leading questions or in other ways contaminates the interview, you may lose this family from the sample.

Regardless of the types of testing chosen, provide each re-interviewer with feedback on what he or she did well and where changes are needed.

Manage Your Data Collection

Jump Start

This section of the guide describes how to track your state's data collection, monitor your state's response rate, and ensure that data is only from families in your state's sample. It also discusses ways to ensure that your state's eligibility determinations are accurate and verifiable. The following actions will help you decide where to start:

- ✓ Review the standards that apply to obtaining data from families and making eligibility determinations;
- ✓ Document and manage your state's data collection; and
- ✓ Complete, document, and double-check your eligibility re-determinations.

Standards

To manage your state's data collection well, become familiar with the standards for practices for obtaining data from families and making eligibility determinations. Table 14 lists the eight standards that apply.

Table 14. Criteria and Standards for Data Collection and Making Eligibility Determinations

Criterion	Acceptable Standard
Interviewees match the sampling list: unauthorized replacements are not included.	The state re-interviews only the families of children on the original or authorized replacement sampling lists.
Response rate is sufficient.	The state identifies the response rate, which exceeds 75 percent, and reasons for non-response are known.
Non-response bias is addressed.	The state identifies extent and types of non-response, and particularly where the response rate is below 75 percent, discusses the likely impact of non-response, and, where possible, applies appropriate weights for non-response.
Process for determining eligibility is independent.	Eligibility decisions are independent of the original decisions.
Eligibility determinations are documented clearly.	Clear protocols for determining eligibility for re-interviews exist and are followed either by the re-interviewer or by an expert reviewer.
Reasons for changes in eligibility status are known.	If the eligibility determination changes, the state documents the specific reasons for differences in the COE and eligibility status between the original and the re-interview.
Ineligibility determinations could be appealed.	The state has a consistent, formal appeals process that includes review by an independent examiner and documentation of each review conducted.
Eligibility determinations are accurate and replicable.	Independent analysis of a random sample of re-interview COEs confirms that eligibility decisions are highly accurate and the impact of any errors on the reported defect rate is negligible.

With your state's re-interview protocols in place, and your independent re-interviewers recruited, trained, and tested, you are almost ready to begin the re-interviews. First, however, check that your state can manage and process the information it is collecting.

Document and Manage Your Data Collection

The key to managing and monitoring your state's data collection is good documentation. Maintain a complete list (e.g., in an Excel spreadsheet so that you can print copies) of everyone who is sampled for re-interviewing, along with any subgroup information (e.g., region, original recruiter). On that list, provide columns in which interviewers and others who handle the re-interviews can note:

- ✓ The dates and times of each time they tried to interview a family;
- ✓ The outcomes of those attempts (not at home, refused, try later, moved, interviewed);
- ✓ The outcomes of completed interviews (qualified, not qualified);
- ✓ The name of the person who interviewed them;

- ✓ The name of the person who made the eligibility determination;
- ✓ The name of the person who confirmed the eligibility determination;
- ✓ The reasons for any change to not qualified status in narrative form;
- ✓ The reasons for any change to not qualified status categorized;
- ✓ Date of any appeals made and instigator of appeal;
- ✓ The outcome of any appeals made; and
- ✓ Notes of any special issues or circumstances.

Tool 11 (page 101) in the Tools section contains a sample Interview Outcome Disposition spreadsheet that you can copy into Excel.

This list allows your state to verify that only those families in the original sample have been interviewed (because information from non-sampled families can be easily identified and disregarded). It also allows for monitoring the response rate as often as the list is updated. (Divide the total number of families that contact was attempted into the number of families who have completed the interview.) The list can also provide you with information on the causes of non-response (just tally up the attempt outcomes column) and indicates whether non-response was distributed evenly by subgroups. It also allows for easy documentation and categorization of the reasons for changes in eligibility later on.

Make, Document, and Double-check Your Eligibility Re-determinations

As the data is collected, your state's eligibility determinations will be made and documented. There are several options to choose from in making eligibility determinations. These range from simple, single person approaches to approaches that involve expert group consensus.

Before the re-interview process begins, consider recruiting three to five individuals experienced in making eligibility determinations who can help with very difficult determination issues. Brief these individuals on your state's re-interview process and timeline. That way, help will be available when it is needed.

Verify a Sample of Your Determinations: No matter which method used to make and document your state's eligibility determinations, pull a small simple or systematic random sample and have an independent third party check it. Examining as few as ten re-interview eligibility determinations can quickly locate and fix problems as well as ensure that your determinations are accurate and verifiable. This should not be a time-intensive process. (See Tool 12 on page 102 of the Tools section for an easy-to-use example of a verification worksheet.) Consider hiring a consultant with migrant education experience (e.g., a retired recruiter), swapping samples with another state, or getting a knowledgeable volunteer from within your education department who is not currently involved with your MEP.

Establish an Appeals Process: Every state should have a formal appeals process in place that will allow families, LOAs, and other interested parties to contest ineligibility determinations from the re-interview process. This appeals process should be independent of your recruitment and re-interview processes.

You can tailor the appeals process to meet your state's resources and needs, as well as any State laws and generally applicable procedures that may apply. Appeals may come from school district staff, recruiters and ID&R staff, state office MEP staff, or parents depending on who are notified of ineligibility decisions. When you communicate ineligibility decisions, information should be included on how to appeal the decision, to whom, and by when. Different types of potential appeals processes include:

- ✓ A formal appeals board made up of completely independent consultants or knowledgeable volunteers;
- ✓ A designated expert outside the state MEP office; and
- ✓ A designated person at the state MEP office. (This person should not oversee the re-interviewers directly.)

The individuals in charge of the appeals process should have expertise in ID&R and have knowledge of your state's migrant population and issues. The individuals should also keep complete and accurate records of the appeals process and outcome for each appealed case. (See the Appeals Documentation example in Tool 14 on page 104 of the Tools section.)



Bright Idea

You can use the following approaches individually or in combination to make your eligibility re-determinations.

- Have your independent re-interviewers make the initial eligibility determination and clearly document it by completing a designated section of your re-interview form or a separate eligibility determination form. Verify that the determination includes a yes/no checkbox for eligibility and a written justification of that determination.
- Have a separate, independent person or group of people make eligibility determinations based on the completed forms. As with the independent re-interviewers, they should also clearly document the determination using both yes/no and open-ended items.
- Have each preliminary eligibility determination reviewed by a group of experienced recruiters. Have the group document reasons for agreeing or disagreeing with the initial determination.
- Have independent re-interviewers swap and check each other's eligibility determinations. Document agreement or disagreement in writing in a designated spot on the form.

Analyze and Use Your Data



Jump Start

Once all the eligibility decisions are made, it is time to calculate the defect rate. The following actions will help you decide where to start:

- ✓ Review the standards that apply to calculating and using the state defect rate;
- ✓ Calculate your state defect rate;
- ✓ Apply appropriate weighting for your sampling design;
- ✓ Apply appropriate weighting for non-response; and
- ✓ Report and use the results of your re-interviews.



Standards

To keep your state's data collection well managed, become familiar with the standards for calculating your defect rate. Table 15 lists the three standards that apply.

Table 15. Standards for Calculating Your Defect Rate

Criterion	Acceptable Standard
Defect rate is calculated correctly.	Both the numerator and the denominator of the defect rate are correctly defined, and all calculations are correct.
Data are weighted appropriately for the sampling design.	If the sampling design is stratified or clustered, any sampling weights are correctly applied.
Non-response bias adjustments are correct.	If non-response issues are identified, the state makes appropriate non-response corrections.

Calculating Your State's Defect Rate

The defect rate of your entire state is the only rate reported to the U.S. Department of Education (i.e., even if defect rates for specific groups or regions are calculated for your state's own information, these are not reported). The data for the state defect rate consist of every completed re-interview. Use all these interviews in the denominator of the defect rate, while using only the ineligible ones for the numerator. How your eligibility defect rate is calculated depends on how your state was sampled. If a simple random sample, a systematic random sample, or a self-weighting PPS sample was used, the calculation is the total number of ineligible re-interviews divided by the total number of re-interviews completed. Unless all children are found to be ineligible, this will result in a decimal less than one. Defect rates are usually expressed as a percentage and this can be calculated by multiplying the decimal by 100. (Or, if the rate is calculated in a computer spreadsheet, the decimal can be formatted as a percentage.) For example, if 200 completed interviews were completed in your state and six ineligible children were found, your calculation is as follows:

6 ineligible determinations/200 completed interviews = 0.03 or 3 percent.

If your state used any other type of sampling or if there are non-response issues, your state's calculations will be more complex and you will need to consult the next section about applying sampling weights to your data.

Applying Appropriate Weighting for Sampling

In complex samples, children have different chances of being included. These different probabilities need to be taken into account when calculating the rate. Each sampled child's weight in the defect rate matches the percentage of the population that the child represents. For example, if you divided your sample into small and large counties and sampled three times as many children in small counties as large counties, children in small counties are three times as likely to be re-interviewed. In this example, before you calculated the rate, the number of re-interviews and the number of ineligible interviews in small counties would need to both be divided by three. Alternatively, the corresponding numbers in the large counties could be multiplied by three. This kind of calculation can be complicated to do properly, so you may want to consult a sampling statistician who can correctly calculate the weights and apply them to the defect rate calculation.

Bright Idea

If you want to avoid sampling weights, use a sample design that does not require them. If you use a complex sample to avoid travel costs, remember you may incur extra statistical costs.

Applying Appropriate Weighting for Non-Response

Non-response weights are used in two cases: *complex samples* and *simple samples* if there is non-response bias. Non-response bias occurs when there are uneven response rates among groups with different defect rates. The good news is that if your state has high response rates you may not need non-response weights. You may also avoid them if your state used a complex sample and if you have similar response rates across your sampling divisions (e.g., the response rate was 80 percent in all counties).

If your state has uneven response rates, your sampling statistician can calculate non-response weights. These weights rebalance your sample so that each sampling division represents the number of interviews assigned to it. These weights are usually calculated and applied before the sampling weights, although sometimes statisticians do it in one step.

In some cases, your state may have to adjust for non-response bias. This might happen, for example, if you have a harder time finding and interviewing youth migrating on their own compared with migrant families. If these groups have different response rates, non-response weights may be needed to correct any bias introduced in the overall defect rate. To check for non-response bias, your statistician can look at response rates and defect rates for groups within your population. If there appears to be under- or over-participation by some groups, your statistician can construct the appropriate weights. For example, if your interviewers find all families of elementary-school children but only half of the families of high school children, each high school child would receive a weight of two so that high school children represent the correct proportion of the sample.

Bright Idea

The best way to avoid having to use non-response weighting is to get a high response rate during interviewing. Attention to field procedures that yield a high response rate can save time and money in this scenario.

Report and Use the Results of Your Retrospective Re-interviews

A final report can communicate the outcome of your re-interviewing process. The report need not be long or complicated. (See Tool 16, the Reporting Template, on page 106 of the Tools section.) It should focus on the outcomes of your state's re-interviewing process and include enough explanation that the reader can conclude that the process was valid and reliable.

As in writing any report, the final report should consider who the audience is and how they will want to use the results. By this time in the process, you will have already gathered much of the information for the report. It is often better to keep the report short and put technical information or supplemental documentation in appendices.

In each section, the report should cover what you did and how that met the standards for valid and reliable re-interviewing. The report should have:

- ✓ An introduction that summarizes the results and gives an overview of each section of the report;
- ✓ An overview of the purpose of your re-interview process (e.g., retrospective, monitoring, rate generating);
- ✓ A section explaining your methodology from sampling through interviewer selection, data collection, and analysis;
- ✓ A table that clearly documents the number of children sampled, re-interviewed, and found ineligible (by subgroup if your sampling plan includes them);
- ✓ A section that summarizes the reasons for child ineligibility including a table of the number of ineligible cases by reason for ineligibility;
- ✓ A section that summarizes your state's findings, including the defect rate and any differences among subgroups (if your sampling approach includes them);
- ✓ A section that summarizes any problems or special circumstances you encountered;
- ✓ A description of what your state will do based on the re-interview findings; and
- ✓ An appendix or appendices with your state's written sampling plan, your interviewer manual, a copy of the re-interview, a description of your hiring process, and a summary of how you ensured that the process was independent of the original interviews.



Consider This

When reporting the results, remember to stay true to the purpose and the methods you used. If you had a small sample and want to break out your state's results by subgroups, check with your statistician to determine whether your sample has the power to make meaningful comparisons. If, in writing the report, you realize the usefulness of other information that you do not have or that is not statistically sound, acknowledge that this information would be helpful and then build it into the next round of re-interviewing.



Bright Idea

Plan ahead and create a timeline for your report. Along the way, gather information for your report, especially copies of supporting materials for your appendix. Write the process sections for your report as you complete each step in your process. This way you can focus on the analysis and the results once you have them.

Section V: Tools



Samples to modify to meet your needs

HOW TO USE THESE TOOLS

The tools in this section will guide you in implementing the techniques discussed throughout the guide. Throughout this section, you will see icons to highlight particular kinds of tools.



Checklist icons indicate steps you will want to follow as you carry out a process or implement a protocol.



Worksheet icons indicate questions you can use to clarify your process or to calculate rates.



Example icons indicate examples of calculations you can perform or forms you can create.



Template icons indicate patterns you can use when creating your own forms and documentation.



TOOL 1: CRITERIA AND STANDARDS CHECKLIST

Directions: Use this checklist to ensure that your re-interviewing process meets accepted standards for reliable and valid data. If you check No on any questions, address these areas as soon as possible.

Sampling

Do you have a written sampling plan? (Retrospective only)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Does your plan include a description of the desired precision of the sample (e.g., Our sample size will allow us to be 95 percent confident that our rate is accurate within +/-5 percentage points.)? (Retrospective only)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Does your plan include a description of the sampling universe? (Retrospective only)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Does your plan include a description of the sources of data used in sampling? (Retrospective only)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Does your plan include an explanation of the sampling procedures? (Retrospective only)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Do you have a structured approach to generating the sampling list?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Do you have a structured approach to checking the sampling list?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Does the sampling universe list contain at least 99 percent of the migrant children in the population?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Do all eligible children in the sampling list have a known, non-zero probability of being drawn that is independent of the selection of others?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Will the planned sample size result in, at least, a confidence interval of +/- 5 percent at the 95 percent confidence level? (Retrospective only)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Did you follow the sampling plan, with minor exceptions?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Does the sample pulled represent the entire universe?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Does the initial sampling plan address issues of obtaining an adequate response rate from this difficult-to-survey population?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Does the initial sampling plan include a systematic approach to replacement to ensure that there is a known, non-zero probability for each person sampled?	<input type="checkbox"/> Yes <input type="checkbox"/> No

Obtaining Data from Families

Do you only re-interview the families of children on the original or authorized replacement sampling lists?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Have you calculated a response rate?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Does your response rate exceed 75 percent?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Do you know the reasons for non-response?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Have you described the likely impact of non-response (particularly if your response rate is below 75 percent)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Have you weighted for non-response, if necessary?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Do you either match the initial interview type (face-to-face or phone) or provide data on the comparability of phone versus face-to-face interviews for your population?	<input type="checkbox"/> Yes <input type="checkbox"/> No

Do you use a re-interview protocol that contains all of the information used in making the original eligibility determination?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Has the protocol, including both items and additional probes, been pilot tested with migrant families who are similar to those being re-interviewed?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Do you let families know about the re-interview processes used at the original eligibility determination interview?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Do you use interviewers and re-interviewers who can communicate comfortably with the families?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Do you use interviewers and re-interviewers who ensure that their processes are not intentionally or unintentionally threatening or harmful to the family?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Do your re-interview protocols include appropriate informed consent?	<input type="checkbox"/> Yes <input type="checkbox"/> No

Ensuring Re-interviewer Independence and Skills

Do you ensure, at a minimum, that re-interviewers did not also carry out the original interviews?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Do you ensure that re-interviewers have no knowledge of the content of the original interviews, aside from information required by your protocol (e.g., family member names and the date of the original interview)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Do you ensure that re-interviewers are not SEA or local operating agency staff members working to administer or operate the MEP? (Always do this for retrospective re-interviews and make sure to do this once every three years for prospective re-interviews.)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Do you address re-interviewer conflicts of interest that you find?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Do you make an effort to match interviewers hired to the language of the parents they are to interview?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Do you make an effort to select interviewers who have knowledge of migrant populations?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Do you make an effort to select interviewers who have experience with migrant populations?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Do all re-interviewers have detailed training regarding the eligibility requirements for the MEP?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Do all re-interviewers have detailed training regarding the purpose of the re-interviews?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Do all re-interviewers have detailed training regarding the instrument?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are all re-interviewers tested and/or observed during actual or practice interviews to ensure that they are applying the protocol correctly?	<input type="checkbox"/> Yes <input type="checkbox"/> No

Making Eligibility Determinations

Are eligibility decisions based on re-interviews independent of the original decisions?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Do clear protocols for determining eligibility for re-interviews exist?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Does the re-interviewer or an expert reviewer follow clear protocols for determining eligibility?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If the eligibility determination changes, do you document the specific reasons for differences in the Certificate of Eligibility and eligibility status between the original interview and re-interview?	<input type="checkbox"/> Yes <input type="checkbox"/> No

Do you have a consistent, formal appeals process?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Does this appeals process include review by an independent examiner?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Is documentation of each review provided?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Does independent analysis of a random sample of re-interviews confirm that eligibility decisions are highly accurate?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Does independent analysis of a random sample of re-interview Certificates of Eligibility confirm that the impact of any errors on the reported defect or discrepancy rate was negligible?	<input type="checkbox"/> Yes <input type="checkbox"/> No

Calculating and Using the Defect Rate or the Discrepancy Rate

Are both the numerator and the denominator of the rate defined correctly?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are all calculations correct?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If the sampling design requires sampling weights, are they applied correctly?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If non-response issues are identified, do you make appropriate non-response corrections?	<input type="checkbox"/> Yes <input type="checkbox"/> No

Selected Sampling and Methodological References

Groves, R.M. , Fowler, F. J. Jr. , Couper, M. P., Lepkowski, J. M., Singer, E., and Tourangeau, R. (2004). *Survey Methodology*, Hoboken, NJ: Wiley.

Henry, G.T. (1990) *Practical Sampling*, Newbury Park: Sage.

Lohr, S. L. (1999). *Sampling: Design and Analysis*, Pacific Grove, CA: Duxbury.



TOOL 2: SAMPLING DECISIONS WORKSHEET

You and your statistician have many decisions to make about sampling. These decisions will be based on the purpose and timing of interviews. Use the tool below to prepare for your meeting with the statistician.

First, go through your answers to the re-interview purpose and timing questions included in Section II: How To Choose section. (See Section III for prospective interviewing and Section IV for retrospective interviewing). Use the answers to those questions to complete the worksheet below. Then, before talking with your statistician, review the list of issues to identify what you will want to discuss together. If you have any unique situations that are not listed below, be sure to mention them.

Check Here	Important Things to Tell Your Statistician	Things to Consider in Consulting Your Statistician About This
	I have limited statistical resources.	There is no way to get around needing someone with statistical experience to oversee sampling. Let your statistician know that you have limited resources and must do most of the work yourself. Ask him or her to consider the simpler samples. Also, consider using your migrant student database as the universe list and using Excel or asking your statistician for a simple way to select the sample.
	I need to produce an eligibility prospective discrepancy rate/retrospective defect rate.	Your statistician will need to know the size and precision of your desired confidence interval (e.g., +/- 5 percent with 95 percent confidence). He or she will also need to know the size of the population as well as whether the population is concentrated or evenly distributed in important characteristics (geography, timing). You will also need to tell him or her whether you want rates for specific subgroups of the populations (e.g., summer versus regular term, families versus solo teens).
	I am only monitoring; I am not producing a rate.	You have more flexibility in how you select your sample if you are only monitoring. Before talking to your statistician, identify how best to monitor. For example, do you want to focus mainly on locations with problems or do you want to get a broad overview of issues for a statewide training or curriculum? Also, consider your methods. Will you perform onsite interviews, telephone interviews, or both? Once you have the answers, review your options with your statistician.
	Most of my eligibility determination problems are in a few locations that I need to monitor, but I still want a statewide rate or statewide overview.	Ask your statistician whether you can stratify your sample. Stratification will allow you to focus attention on the problem areas but still either obtain a statewide overview or produce a statewide rate. Also, make sure you let the statistician know that you want a rate (see above).
	I am not sure what sample size to use.	Your statistician will determine the size of your sample by using information from your past re-interviewing experiences, the type of samples you will use, the precision of any estimates (see discrepancy rate/defect rates above), the size of your migrant child population, and the relative sizes of any important subgroups you want treated separately.

Check Here	Important Things to Tell Your Statistician	Things to Consider in Consulting Your Statistician About This
	I need to reduce travel costs.	Ask your statistician if a cluster sample might work for you. Clustering reduces the number of locations you visit, but increases the risk of missing some subgroups. If your subgroups or eligibility problems are concentrated in certain groups, you might miss these areas in a cluster sample.
	I need to ensure I sample both summer and regular term.	Tell your statistician the size of your summer and winter enrollments. Ask about the benefits of a sorted structured list versus a stratified sample. Be sure to tell your statistician whether you want separate eligibility rates or separate analyses of summer and regular terms.
	My migrant population varies throughout the year and/or the concentration and types of migrants vary in different locations within my state.	Provide your statistician with information on how the population varies. Where are different groups concentrated? At what times of the year are migrants entering and leaving the state? The more precise you are the better; however, you still may have to provide more details later. For example, you might say, "Our enrollment peak is in July through October and includes 90 percent of our migrants" or "75 percent of our indigenous-speaking migrants are in the central region" or "My top five counties have 40 percent of the children."
	I think I will have different response rates for different groups of migrants.	Let your statistician know whether you are concerned about higher non-response for certain groups. He or she may recommend a stratified sample or take this into account in setting up any replacement sampling. If possible, provide the statistician with the relative size of the groups, their locations, and why you think non-response will be higher for some groups.
	I can only do telephone interviews.	Your method of interviewing may influence the type of sampling you use. For example, clustering may be unnecessary if you do phone interviews. Also, certain kinds of replacement sampling are easier to use in centralized phone interviews than in the field.
	I will either do the interviews in person or do a combination of in-person and phone interviews.	If your statistician knows that you will be doing field interviews, he or she may be able to recommend a sample that reduces travel time or a replacement sampling that is easier to administer.
	I have a statewide list of migrant children.	Provide your statistician with a description of your migrant child list and how you use it to produce your child count. If the list omits or includes children who are not part of the child count, be sure to tell your statistician.
	I have lists of children, but they reside at the local level.	If you do not have a readily available and up-to-date centralized list of children, you need to inform your statistician of this. Describe to the statistician the kinds of information you do have (e.g., lists of LOAs, number of children per LOA), where child lists reside, what they look like, and how up-to-date they are.

Check Here	Important Things to Tell Your Statistician	Things to Consider in Consulting Your Statistician About This
	I will need to sample COEs and not children.	If you are considering sampling by COE, you will want to tell your statistician about this and explain why. Your statistician will probably give you the pros and cons of sampling by COE versus by child so that together you can make the best choice.
	My statewide list is updated only periodically.	Tell your statistician if your statewide list is updated only periodically (e.g., every quarter) or is most accurate at one time of the year. (For example, in the spring your LOAs review the accuracy of their lists before providing you with child count information.) This information may be important for timing your sampling and data collection.
	It is hard for me to get information on enrollment for subgroups or geographic areas.	For some types of complex sampling, knowing the size of subgroups and/or geographic areas is important. Inform your statistician if you have difficulty obtaining accurate counts of this type.
	I do not want to do too many interviews in large areas. Or I want to do the same number of interviews in each county.	Tell your statistician that you have concerns about how interviews are allocated. Explain that you want to use quotas (e.g., 30 per county) or have other preferences about interview allocations. Be prepared to explain your concerns or your desire to allocate the interviews in a particular way. Your statistician will probably provide you with the pros and cons of allocating interviews in different ways, and together you can reach a decision.



TOOL 3: SAMPLING UNIVERSE CHECKLIST

This tool will help you ensure that your sampling universe is complete. First, briefly describe the group to be interviewed (e.g., all migrant children currently being served, or all COEs created this year, or all migrant children recruited this year in region X).

Second, think about how you will use the results. Remember: ***Your results only apply to the groups from which you pull your sample!***

What you will need to collect to have an accurate sampling universe:

- ☐ A list that contains all (99 percent or more) of the people in the group you described above. (Ideally, this will be your state's migrant student database that includes the children that were/will be recruited between September 1 and August 31 of the year associated with your state's upcoming CSPR.)
- ☐ Subgroups of interest (e.g., region, year of recruitment, recruiter).
- ☐ Information on who may be excluded from the list for any reason.
- ☐ Ideally, a method of double-checking that the total number of individuals on your list is correct. For example, make sure that all current year COEs have been submitted, cleaned, and processed.

If you do not possess a single list (i.e., lists are kept only at the local district or regional level) you will need:

- ☐ A list of the local districts/regions that contains at least 99 percent or more of the population in which you are interested.
- ☐ If the population in which you are interested resides in some districts/regions but not in others, you need to know, for each region, whether members of the sampling population and relevant subgroups are located in that region.
- ☐ Access to lists of the entire population of migrant children (or COEs) for each district/region you pull in your sample.
- ☐ Information on any people in the group of interest who may be excluded from the local lists.
- ☐ Ideally, counts of how many of your migrant children and your population of interest are in each district/region.
- ☐ Ideally, a way of double-checking that the total number of individuals on your local lists appear to be correct. For example, make sure that all current year COEs have been submitted, cleaned, and processed.

**TOOL 4: SAMPLE SIZE CALCULATOR**

An easy Internet calculator with a good help section is that of the National Statistical Service, located at: <http://www.nss.gov.au/nss/home.NSF/pages/Sample+Size+Calculator+Description?OpenDocument>

To use this calculator, enter the confidence level, population size, eligibility defect rate expressed as a decimal (17 percent as $p=0.17$), and the confidence interval expressed as decimals. For the confidence interval, the $p\pm 0.05$ is the plus or minus value expressed as a decimal. To obtain the upper and lower limits of the confidence interval, add 0.05 to the defect rate. For example, the upper limit in the case below is $0.17+0.05$ or 0.22 (22 percent) and the lower limit is $0.17-0.05$ or 0.12 (12 percent). Once this information is all entered, press “Calculate.” The program will calculate the size of sample, expected standard error, and relative standard error. In the case below, the calculated sample size is 210. Note that this is less than the 384 interviews suggested by OME last time. This is because, when you do not have previous information about the rate, you should choose a rate of 50 percent. This rate gives the highest possible sample size for the population, precision, and confidence interval. Remember that you need to account for non-response. Non-response issues are discussed in Sections III and IV.

Ideally, a sampling statistician will perform these calculations. However, this calculator allows you to check the values of a consultant or understand how the sampling size is selected.

Online Sample Size Calculator

Confidence Level	<input checked="" type="checkbox"/> 95% <input type="checkbox"/> 99%
Population Size	<input type="text" value="6000"/>
Proportion (p)	<input type="text" value="0.17"/>
<input checked="" type="checkbox"/> Confidence Interval: $p\pm$	<input type="text" value="0.05"/>
Upper	<input type="text" value="0.22000"/>
Lower	<input type="text" value="0.12000"/>
<input type="checkbox"/> Standard Error	<input type="text" value="0.02551"/>
<input type="checkbox"/> Relative Standard Error	<input type="text" value="15.01"/> %
<input type="checkbox"/> Sample Size	<input type="text" value="210"/>



TOOL 5: CREATING A LIST OF RANDOM NUMBERS IN EXCEL

You may need to create a list of random numbers in order to draw your random sample. Here is a quick way of doing so in Microsoft Excel:

- 1) Copy all the ID numbers for migrant children or COEs in your universe list in Column A, in whatever order you have them.
- 2) In Column B, next to the first ID number in column A, type “=rand()”.
- 3) Copy this formula down Column B until you reach the end of the ID numbers in Column A. As you copy the formula down Column B, random numbers between 0 and 1 will appear. (See example table below)
- 4) Select and copy all of Column B.
- 5) Right click in the first cell of Column B and select “Paste Special” from the drop-down list that appears.
- 6) From the “Paste” list that appears next, select “Values and Number Formats”. (This will stop the random list from changing every time you type something.)
- 7) Select the whole worksheet by clicking in the upper left corner. From the menu across the top, select Data, and then select Sort from the drop down list that appears.
- 8) When the “Sort” box appears, select “Column B” in the first “Sort by” box. This will sort your list by the random numbers you created, randomizing your list.
- 9) To pick your random sample, take the number of ID numbers that you need from Column A, in order. (For example, if you need a random sample of 100 children, take the first 100 ID numbers on the newly sorted list.)

After Step 2	
Column A	Column B
1	=rand()
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	

After Step 6	
Column A	Column B
1	0.953661
2	0.6413544
3	0.2106772
4	0.4473499
5	0.464038
6	0.5637379
7	0.3295354
8	0.3733802
9	0.0823468
10	0.5218166
11	0.9297205
12	0.451448
13	0.3095542
14	0.6614191
15	0.6521351
16	0.3127508
17	0.7368449
18	0.379918
19	0.9918014
20	0.3646715

After Step 8	
Column A	Column B
9	0.0823468
3	0.2106772
13	0.3095542
16	0.3127508
7	0.3295354
20	0.3646715
8	0.3733802
18	0.379918
4	0.4473499
12	0.451448
5	0.464038
10	0.5218166
6	0.5637379
2	0.6413544
15	0.6521351
14	0.6614191
17	0.7368449
11	0.9297205
1	0.953661
19	0.9918014



TOOL 6: SAMPLING PLAN

To meet the sampling criteria, a sampling plan should cover the following:

- ✓ Purpose of the sample;
- ✓ The sampling universe;
- ✓ Sources of sampling data;
- ✓ Sampling approach including random component;
- ✓ How the sampling will be carried out;
- ✓ Method of replacement sampling;
- ✓ Sample size calculations; and
- ✓ Any known sampling bias.

Sample form for a sampling plan

The following items should be considered when creating a sampling plan:

- ✓ **Purpose of the sample.** Describe why you need the sample and any requirements for the sample.
- ✓ **The sampling universe.** Describe the sampling universe (i.e., the population under study). Be precise.
- ✓ **Sources of sampling data.** Describe the data source you will use as your sampling universe list. Describe its relation to the sampling universe.
- ✓ **Sampling design including random component.** Describe the sampling design, how random selection is involved, and why you selected this particular sampling design.
- ✓ **How the sampling will be performed.** Describe the steps taken to draw the sample.
- ✓ **Method of replacement sampling.** Describe how you will replace members of the original sample if you cannot locate them.
- ✓ **Sample size calculations.** Describe how you calculated the sample size.
- ✓ **Address any known sampling bias.** If any sampling bias exists, describe it. Or describe why you believe there is no sampling bias.

Example of a sampling plan

Purpose of the sample. Describe why you need the sample and any requirements for the sample.

This sample is for a prospective eligibility re-interview study. The study requires a random sample of children, who were recruited (i.e., whose eligibility was determined) this year. The goal is to prospectively monitor eligibility but also produce an eligibility discrepancy rate that has a 95 percent confidence interval of +/- 5 percent.

The sampling universe. Describe the sampling universe (i.e., the population under study). Be precise.

The sampling universe consists of all children, ages 3 through 21, who were recruited (i.e., whose eligibility was determined) between September 1 and August 31 of this year.

Sources of sampling data. Describe the data source you will use as your sampling universe list. Describe its relation to the sampling universe.

The sampling universe list will consist of the list of children in the New Generation System (NGS) database. This list is used in this year's total child count, which includes children from ages 3 through 21 who were eligible to receive MEP services during the regular school year and/or summer session.

Sampling design including random component. Describe the sampling design, how random selection is involved, and why you selected this particular sampling design.

The sampling design is a structured, random sample using a sorted list. Because our state is both a sending and receiving state, with migrant children enrolling throughout the year, we will sort the list by month and by geography. Since every child's eligibility is reviewed each year, this will mean that most of the interviews will be done in the fall and at the beginning of the summer session. This schedule corresponds well with our state's migrant population, which peaks from July to October.

How the sampling will be carried out. Describe the steps taken to draw the sample.

Each month, we will obtain from the NGS database the list of children ages 3 through 21 who have enrolled in the MEP in the previous month. We will sort the list by county and randomly by child within the county. From a random starting place, e.g., every 30th child on the list will be selected and re-interviewed in person by local interviewers. A random starting place will be selected for the September sample, and every month thereafter the sample will continue as it left off in the previous month. For example, if the rule is draw every 30th child and 23 children were on the list at the end of the previous month, the following month will start with child 7 on the list.

Method of replacement sampling. Describe how you will replace members of the original sample if you cannot locate them.

Multiple samples will be drawn using the same method. That is, we will use multiple, random starting places to select children at the same intervals on the list. There will be four lists: the main list as well as replacement lists A, B, and C. If the child on the main list cannot be found after seven attempts, the corresponding children on the replacement lists A, B, and C will receive three contact attempts until a successful interview is completed. For example, if the 107th child on the main list cannot be found, the 107th child on list A will be contacted.

Sample size calculations. Describe how you calculated the sample size.

Our previous defect rate was 5 percent. Adding 5 percent to that, the sample size for a rate of 10 percent in a population of 5,000 is 135 children for a 95 percent confidence interval of +/- 5 percent. Because we are using multiple lists to select replacements and are not over sampling, our final sample size is 135.

Address any known sampling bias. If there is any sampling bias, describe it. Or describe why you believe there is no sampling bias.



TOOL 7: STEPS TO REDUCE NON-RESPONSE

The steps on this list will help you consider strategies for obtaining a good response rate from your families. A good response is crucial for an accurate discrepancy/defect rate and useful data. Ideally, 75 percent or more of your families should respond.

- ☐ Start with good information: Check that the child list used for your sample is as complete and updated as possible.
- ☐ Verify that contact information is up to date: Where information is questionable or missing, consider contacting local district personnel to obtain correct information.
- ☐ Ensure that your re-interviewers speak the language and are familiar with the culture of your families.
- ☐ Perform your re-interviews as soon as possible after the initial interview.
- ☐ When possible, tell families at the initial interview that they may be selected for re-interviews and when the re-interviews are likely to happen.
- ☐ Let your re-interviewers know the number of times they should attempt to contact each family.
- ☐ Ensure that each re-interviewer records each attempt to contact a family and its outcome. (Double-check that each family either has been re-interviewed or has received the recommended number of contact attempts.)
- ☐ Attempt to contact families on days and times that they are likely to be at home.
- ☐ Attempt to contact hard-to-locate families at different times of the day and on different days.
- ☐ Consider having a local liaison in each district who can facilitate contacts with the family. (This person should be someone who knows the family and can vouch for your interviewers. He or she can introduce your re-interviewers, but the person should not be present during the re-interview.)
- ☐ For families who have moved, consider whether they can be located by phone at their new address.
- ☐ For families who cannot be found, determine whether secondary sources (independent of the school system) such as neighbors, roommates, landlords, or employers can provide either the information you need or contact information for the family.



TOOL 8: TRAINING GUIDE

You should put time and thought into your recruitment and training of re-interviewers. Re-interviewers need to focus on collecting the most complete, fair, and accurate information possible, given time and instrumentation constraints. They act as your frontline and can influence the information that you gather.

General Information

Date of Training: _____ Time: _____ Place: _____

Trainer: _____ Total Participants #: _____

Materials/Supplies Needed:

Sample Agenda

20 minutes Welcome & Check-In (introductions, attendance, housekeeping, icebreakers)
 15 minutes Understanding Our Purpose for Re-interviewing
 60 minutes Overview of Migrant Education in our State and Eligibility Criteria
 (15-minute break)
 30 minutes Sampling Approach
 60 minutes Re-interview Protocol
 (45-minute break for lunch)
 60 minutes Practice and Observation
 30 minutes Questions/Concerns
 10 minutes Closing

Understanding Our Purpose for Re-interviewing

1. To increase understanding of your state's purpose for re-interviewing.
2. To increase knowledge about the criteria for eligibility—including specific issues for your state.
3. To increase knowledge about the sampling approach, particularly in relation to the sampling lists.
4. To increase the ability to implement effective and efficient re-interviews following appropriate re-interview protocols.

Overview of Migrant Education in our State

Background Information

Re-interviewing allows you to ensure that your eligibility determinations and the numbers you report are accurate. It also helps you identify and fix any problems in your ID&R process and establish a discrepancy/defect rate for monitoring and funding purposes.



Your purpose statement (use information you considered in the Re-interview Purpose section of this guide):

Suggested Training Modalities

- ✓ Lead a discussion and review of background information. Invite participants to share what they think about the purpose of the re-interviewing and how it might help the state.
- ✓ Include your purpose statement on information sheets or training materials as a continual reminder.

Eligibility Criteria

Background Information

The checklist below includes the minimum information you should INDEPENDENTLY assess. Provide a brief overview of your state's Migrant Education Program. Also include any state-specific issues/special circumstances that make eligibility determinations difficult (e.g., subsistence fishing in Alaska, trends in vacation moves in your state).

Overview of State Migrant Education Program

State-Specific Concerns

Eligibility Checklist

- ☐ The identity of the child (e.g., the same child that was previously determined eligible).
- ☐ The child was younger than 22 at the time of the move.
- ☐ The child was eligible for a free public education under State law at the time of the move.
- ☐ The child moved on his or her own as a migratory agricultural worker/migratory fisher OR the child moved with or to join/precede a parent, spouse, guardian who is a migratory agricultural worker/migratory fisher.
- ☐ The move was from one school district to another.
- ☐ The move was a change from one residence to another residence.

- ☐ The move was due to economic necessity.
- ☐ The move occurred no more than 36 months before the date the family was recruited.
- ☐ One purpose of the worker's move was to seek or obtain qualifying work (check a, b, or c):
 - ☐ a. the worker moved to obtain qualifying work, and obtained qualifying work, OR
 - ☐ b. the worker moved to obtain any work, and obtained qualifying work soon after the move, OR
 - ☐ c. the worker moved for qualifying work specifically, but did not obtain the work. If the worker did not obtain the qualifying work (check i or ii.)
 - ☐ i. The worker has a prior history of moves to obtain qualifying work, OR
 - ☐ ii. There is other credible evidence that the worker actively sought qualifying work soon after the move.
- ☐ The work sought or obtained was temporary or seasonal employment.
- ☐ The work sought or obtained was agricultural or fishing.
- ☐ All names, dates, locations, comments, etc., from the COE.

Suggested Training Modalities

- ✓ Lead a discussion and review of background information. Ask participants what they think might be unique concerns for your state's migrant population.
- ✓ In small groups, provide case examples and a checklist for practicing the eligibility checklist.

Sampling Approach

Background Information

Identifying and drawing a sample thoughtfully will ensure that it will meet your information needs. The type of information you need to know, the type of sampling design you choose, and the difficulties you anticipate in getting a response will affect the size of the sample you need.



Refer to information you considered in the Identify the Purpose, Timing, and Previous Experiences of Your Prospective Re-interviewing section of this guide.

Sampling approach: _____

Number of interviews needed for sample size: _____

Populations of special interest: _____

Suggested Training Modalities

- ✓ Lead a discussion and review of background information. Discuss choices about any populations of special interest or decisions that you used to stratify/systematize your sampling.
- ✓ Provide sampling lists that the re-interviewers will be using.

Re-Interview Protocol

Background Information

It is important that the re-interviewer focus on collecting the most complete, fair, and accurate information possible, given time and instrumentation constraints. Using independent re-interviewers who have no known conflicts of interest ensures this result. (See page 66 for more information.)



Answer these questions and refer to the information you considered in the Develop Your Re-Interview Form section (page 30 for prospective re-interviews or page 61 for retrospective re-interviews) to establish your re-interview protocols.

Sampling list application (Do you provide a list in the order that families should be contacted? Or do you follow some other process?)

Materials needed before the interview: _____

Safety concerns: _____

Emergency contact (name/number): _____

How to contact selected families: _____

Number of attempts to contact: _____

Acceptable re-interview respondents:

Example: Ideally, you should talk to the person who was originally interviewed. If that person is unavailable, is another parent, guardian, close family member, or roommate acceptable? Be sure to consider the tradeoffs between losing a response and collecting possibly less accurate information.

Procedure to document attempts and track response rates:

Procedure if family is not home:

Procedure if family has moved:

Re-interview introduction sample (include your purpose!):

Example: A local staff member will introduce the re-interviewer to the individual or family member being interviewed. He or she will explain the purpose of the visit and then excuse him or herself to make a phone call, follow up with a family down the street, etc.

Tips to encourage response:

Example: Provide assurance that the purpose of this data collection is to verify that the program's ID&R processes work properly, not because the original answers are in question. Inform families that they were picked at random. Tell families that their answers are important in helping you serve other migrants in the state. Provide accurate information about the potential outcomes of the re-interview.

Specific instructions about completing the re-interview itself:

Example: During the re-interview process, read the eligibility questions and document the responses in writing on the re-interview form provided. You will need to clarify and redirect questions to fully understand the responses. However, avoid any questioning that uses either forced or overly leading questions. Please do NOT ask the respondent to simply confirm eligibility information that is recorded on an existing COE. On completion of the re-interview process, review the information with the respondent, thank him or her for his or her time, and answer any questions or concerns. When finished, ask the respondent to sign the re-interview form indicating that the information provided reflects what was discussed/shared regarding the child/family and eligibility information.

Procedure to make initial eligibility re-determination, if part of your re-interviewer's job:

Procedure for documentation handling (e.g., how, where, when):

Example: Each team will have a previously established set of COEs containing the names of randomly sampled eligible migrant children and youth. Use the COEs as a point of reference for this individual, to compare previously reported eligibility information with the current information being collected through the re-interview process. Once the interview has been completed, attach the COE to the re-interview form and place both in one of the manila envelopes provided. (You will notice the sticker with your name and interview assignment reference.) Seal the envelope when it is full, and mail or bring the envelope to the main office.

Suggested Training Modalities

- ✓ Lead a discussion and review of background information. For example, invite participants to share safety concerns or tips for encouraging responses.
- ✓ Provide an information sheet (or checklist) with the re-interview protocols arranged by timing of the process.
- ✓ Provide sample materials and scenarios to facilitate role-plays and to practice or test re-interviewers. Include some scenarios with safety concerns so that you can practice this response as well.
- ✓ Use the sample Re-Interview Process Observation Form with a scenario or with a "shadowed" interview.

Training Checklist

At the end of the training session, the re-interviewers should be able to complete the following tasks (as noted in Tool 10, page 100, the Re-Interview Process Observation Form). Use this check list to ensure that the re-interviewers have the knowledge and skills needed to successfully collect the needed data.

The trained re-interviewers should be able to:

- ✓ Provide a clear explanation about the purpose of the re-interview and any risks to the client.
- ✓ Provide a clear explanation about child/youth random selection.
- ✓ Provide a clear explanation about confidentiality of information.
- ✓ Verify/record child information and family data.
- ✓ Ask each eligibility question individually and accurately.
- ✓ Review information recorded with the respondent.
- ✓ Establish and maintain rapport with the respondent.
- ✓ Invite respondent to ask questions or concerns.
- ✓ Ask respondent to sign and date the form.
- ✓ Inform respondent that a copy would be sent to the address provided.
- ✓ Be aware of/respond to any safety concerns.



TOOL 9: RE-INTERVIEWER PROTOCOL AND GUIDE¹

PART I: Preparing for the Interview

- ✓ Prepare as much of your questionnaire as you can ahead of time. Information such as the child's name, address, date of birth, identification number, grade, qualifying arrival date, and name of the person who signed the COE, has already been populated on the questionnaire for you.
- ✓ Share with the local Migrant Education Program staff member the names of the subjects to be interviewed.
- ✓ **DO NOT** call the subject ahead of time to prearrange a time for the interview.
- ✓ Simply review the list with the Migrant Education Program staff member in a logical fashion and prepare to visit the first subject for the interview.
- ✓ If the subject is home, proceed to **PART II**.
- ✓ If the subject is **NOT** home, check the appropriate box on the questionnaire and proceed to next subject on the list. (You must make **NO MORE THAN** __ **VISITS** before the subject is removed from the sample.)
- ✓ If the subject has moved, check the appropriate box on the questionnaire.

PART II: Conducting the Interview

- ✓ Introduce yourself or have the Migrant Education Program staff member introduce you to the subject.
- ✓ Explain the purpose of the visit and any risks to the respondent. For example:

The purpose of our visit is to ask you a few questions that will be used to improve the Migrant Education Program in _____ (give name of your state) and to check our system, not to check on individual families. However, to make sure that children are receiving the correct services, children who are found to be ineligible for migrant education services may be removed from the migrant education program. Your family was randomly selected for this interview. May we visit with you?

(If the subject declines the interview, thank the subject and move on to the next interview.)
- ✓ Follow the questionnaire in the order it appears.
- ✓ **DO NOT** leave any part of the questionnaire blank. If the subject does not wish to respond, note *DID NOT RESPOND* in the space provided.

PART III: Original COE Review

- ✓ Only after completing Part II, remove a copy of the subject's COE from the sealed envelope and compare answers from the interview. If different, explore why.

PART IV: After the Interview

- ✓ Thank the subject for his or her cooperation.
- ✓ Prepare for the next interview.

¹ First two pages adapted from New York's Interview Protocol.

Child Eligibility Re-interview Initiative Questionnaire

Eligible (*Filled out by evaluators*) ☐ Yes ☐ No Reason for Determination:

- ☐ Attempt #1 ☐ Home ☐ Not Home
☐ Attempt #2 ☐ Home ☐ Not Home
☐ Attempt #3 ☐ Home ☐ Not Home
☐ Declined Interview
☐ Moved Away
☐ Verified Eligibility from Other Source (*Explain*) _____
☐ Other (*Explain*) _____

Interviewer _____ Date of Interview _____

Person Accompanying Interviewer _____

Town/City of Interview _____ State of Interview _____

Language(s) of Interview _____

Person who signed the COE _____

Person(s) Interviewed (*Try to interview person who signed COE first*)

Interviewee Name _____

Relationship to Child _____

Interviewee Name _____

Relationship to Child _____

Relationship to Child _____

Home Address: Street _____ Town/City _____

Child Information:

Name _____ Date of Birth _____ QAD _____

Identification Number _____ Grade _____

The information as obtained and documented from this interview is correct to the best of my knowledge.

Parent Signature: _____ Date: _____

1. **Have you or anyone in your family moved in the past few years? Have you or anyone in your family moved (traveled) to do agricultural work in the past few years?**
☐ Yes ☐ No
2. **When was the last date you moved?** _____

(If the date is different from the QAD on the COE, ask about the QAD) **Did you move on/or about (QAD)?**
☐ Yes ☐ No
3. **On this date, where did you move from?** (Record the school district, city, state, country)
4. **Where did you move to?** (Record the school district, city, state)
5. **What type of work were you and your family members looking for?** (Ask the individual to describe the work. Also ask for the employer's name.)
6. **What type of work did you/they obtain?** (Ask the individual to describe the work. Also ask for the employer's name.)
7. **When did you/they obtain the work in (*agricultural or fishing work*)?**
8. **How long did you think the (*agricultural or fishing work*) work would last? How long did you plan to work there? How long were you hired to do the work for?**

(If the worker sought, but did not obtain qualifying work, skip to #11)
9. **When did your employment start?**
10. **When did your employment end?**
11. (If the worker sought, but did not obtain qualifying work) **Why didn't you get the work (*agricultural or fishing work*)?**
12. (If the worker sought, but did not obtain qualifying work) **What efforts did you make to obtain the job at (*name of employer*)? Did you fill out an application? Did you speak with the owner/employer?**
13. (If the worker sought, but did not obtain qualifying work) **Did you ever make a different move to obtain temporary or seasonal employment in agricultural or fishing work?**
☐ Yes (describe) ☐ No

(continued on the next page)

14. Thinking about the move to (*the school district/city/state describe in #4*), did you make the move on your own?

☐ Yes ☐ No

Did (*name of child*) move with you or your family member?

☐ Yes ☐ No

Did (*name of child*) join you or your family member later?

☐ Yes (provide date of child's move) ☐ No

15. Determine if QAD is correct based on information provided. Provide QAD: _____

16. What is (*name of agricultural/fishing worker*)'s relationship to the child?

☐ child (self) ☐ parent ☐ spouse ☐ guardian

17. Was (*name of child*) under the age of 22 at the time of the move?

☐ Yes (provide the child's age at the time of the move) ☐ No

(If the worker is the child) **Were you under the age of 22 at the time move?**

☐ Yes (provide the worker's age at the time of the move) ☐ No

18. Did (*name of child*) graduate from high school or earned a GED before the move?

☐ Yes, graduated or earned a GED ☐ No, had not graduated or earned a GED

(If the worker is the child) **Did you graduate from high school or earned a GED before you moved?**

☐ Yes, graduated or earned a GED ☐ No, had not graduated or earned a GED

Open the copy of the original COE that you brought. Compare it with the re-interview information. Is the information the same?

☐ Yes ☐ No

Did the re-interview uncover a move that was not the COE move? (*Please detail*)

☐ Yes ☐ No

(In the answer to this question is "yes", it might be necessary to ask some or all of the questions above about the other move to determine if the child was/is eligible.)



TOOL 10: RE-INTERVIEW PROCESS OBSERVATION FORM²

Interviewer	_____	Observer	_____
Location	_____	Date	Time
Child/Youth	_____	COE ID#	_____

Purpose: This form ensures that training and data collection procedures occur effectively and efficiently. Information gathered will be used to provide support for re-interviewers and to update our training procedures accordingly.

Directions to Observer: Observe the interview process and check each item that occurs. Note at the end anything that went particularly well, as well as concerns/suggestions for improvement. Please review the feedback with the interviewer before signing and returning this form to the office. Thank you!

- ☐ All team members were present for initial introductions.
- ☐ The local representative (if present) introduced team members to respondent (name and place of employment).
- ☐ The purpose of the re-interview and any risks to the client were explained.
- ☐ Child/youth random selection was explained.
- ☐ Confidentiality of information was explained.
- ☐ Child information and family data were verified/recorded.
- ☐ Each eligibility question was asked individually:
 - ___ 1., ___ 2., ___ 3., ___ 4., ___ 5., ___ 6., ___ 7., ___ 8., ___ 9., ___ 10.,
 - ___ 11., ___ 12., ___ 13., ___ 14., ___ 15., ___ 16., ___ 17., ___ 18.
- ☐ The interviewer reviewed information recorded with the respondent.
- ☐ The interviewer established and maintained rapport with the respondent.
- ☐ The respondent was invited to ask questions or concerns.
- ☐ The respondent was asked to sign and date the form.
- ☐ The respondent was informed that a copy would be sent to the address provided.
- ☐ The interviewer thanked the respondent for participation.
- ☐ The interviewer and the observer signed and dated the form.
- ☐ The interviewer was aware of/responded to any safety concerns.

Observer Notes (things that went well, concerns, additional suggestions)

Interviewer Notes (things that went well, concerns, additional suggestions)

Observer Signature: _____ **Interviewer Signature:** _____

² Based on Georgia's Re-interview Process Observation Form

EXAMPLE**TOOL 11: INTERVIEW OUTCOME DISPOSITION TRACKING SHEET****Disposition Tracking Sheet**

Use this sheet to track the calls and the results of your calls for all people in the order listed on your sample list. Two examples have been provided below.

Child ID / Record #	Attempt 1: Date/Time	Attempt 1: Outcome (See options below)	Attempt 2: Date/Time	Attempt 2: Outcome (See options below)	Attempt 3: Date/Time	Attempt 3: Outcome (See options below)	Outcomes of completed interviews (See options below)	Interviewer	Person who made the eligibility determination	Person who confirmed the eligibility determination	Reasons for any change to not qualified status - Detail Narrative	Reasons for any change to not qualified status - Categorized (See options below)	Date of any appeals made and instigator of appeal	Outcome of any appeals made	Notes of any special issues or circumstances
<i>Examples</i>															
101010	01/01/08 - 11 a.m.	No Answer - Left message on machine	1/5/08 - 4 p.m.	Left message with son: Call back at a later time	1/7/08 - 6:30 p.m.	Scheduled for 1/15/08 - 7 p.m.	Completed - Eligible	Mark Martino	Stacy Saldano - Independent Review Board	Janet Jacobo - State Director	NA (Not Applicable)	n/a/	n/a	n/a	n/a
202020	1/1/08 - 11:30 a.m.	Answered - Scheduled for 1/14/08 - 3:30 p.m.	n/a	n/a	n/a	n/a	Completed - Not Eligible	Mark Martino	Stacy Saldano - Independent Review Board	Janet Jacobo - State Director	Family went to XX on vacation outside the US 6 months ago. Have not moved in the last year to look for agriculture work.	No qualifying move	No appeals made by family or Mig Ed coordinator	Not Applicable	n/a

List of options:

Category	Options	
Attempt Outcomes	No Answer, No message left	Answered - We will call back later to reschedule
	Left message on machine	Answered - (PERSON/Participant) will call back later to reschedule
	Left message with (PERSON)	Answered - Scheduled Interview
Outcomes of Completed Interviews	Completed - Eligible	Undetermined- Need more information
	Completed - Ineligible	Undetermined - Appeal / In Review
Not qualified status	Purpose of the Move – to seek or obtain qualifying work was not one purpose of the worker's move	
	Qualifying Move – last qualifying arrival date more than 36 months before date of recruitment on COE	
	Qualifying Move – move was not a change of residence	
	Qualifying Move – move was not from one school district to another	
	Qualifying Move – child did not move on own or with or to join a parent, spouse, or guardian	
	Qualifying Move – move was not due to economic necessity	
	Qualifying Work – work was not agricultural or fishing work	
	Qualifying Work –work was not temporary or seasonal employment	
	Age – child was over 21 years of age at time of recruitment	
	School Completion – child was not eligible for a free public education at time of recruitment	

**TOOL 12: Eligibility Determination Verification Worksheet**

Review of Eligibility Decisions

State:

Reviewer:

ID	Child was <age 22 or >age 2 with no HS or GED diploma?	Child moved on own as qualifying worker or w/or to join worker?	Move was from one school district to another?	Move was a change of residence?	Moved was due to economic necessity?	One purpose of the worker's move was to seek or obtain qualifying work?	Employment was temporary or seasonal?	Work was agriculture or fishing?	Qualifying move date is within the correct time period?	Independent reviewer said eligible?		State said eligible?		Do decisions match?	
1										Y	N	Y	N	Y	N
2										Y	N	Y	N	Y	N
3										Y	N	Y	N	Y	N
4										Y	N	Y	N	Y	N
5										Y	N	Y	N	Y	N
6										Y	N	Y	N	Y	N
7										Y	N	Y	N	Y	N
8										Y	N	Y	N	Y	N
9										Y	N	Y	N	Y	N
10										Y	N	Y	N	Y	N



TOOL 13: RESPONSE RATE WORKSHEET

Response Rate Worksheet		
Calculate your Response Rate:	Example	Your Numbers
A. How many re-interviews did your state complete , including both eligible and ineligible respondents?	250	
B. How many families from the sample list did you attempt to contact ? Include successful contacts, those who were not home, those who had moved, and those who refused. Do not include sampled families that you never attempted to contact (e.g., replacement sample families that you did not need).	350	
C. Divide your number of completed interviews by the number of families you attempted to contact. This is your response rate .	$250/350=$ 71%	



TOOL 14: APPEALS PROCESS DOCUMENTATION³

NAME OF CHILD:

COE#:

SCHOOL DISTRICT AT TIME OF RE-INTERVIEW:

PRELIMINARY REASON FOR INELIGIBILITY DETERMINATION:

CHALLENGE RESPONSE:

Evaluator Panel: _____

Moderator: _____

Date of Review Conference: _____

After the evaluators have reviewed all additional documentation on this child, their conclusion is that the child has been determined to be: (Please check appropriate box.)

☐ Eligible

☐ Ineligible

☐ Can't determine eligibility or ineligibility

³ Based on New York State's Appeals Documentation.



TOOL 15: WEIGHTING DECISIONS: DETERMINING NECESSITY OF SAMPLE WEIGHTS



Directions: Criteria for valid and reliable results include applying appropriate sample weights, if necessary. Sampling weights adjust for the different chances of selection among sample members. Complete this questionnaire to determine whether you need to apply sample weights.

If you can answer yes to ALL of the following questions, you do NOT need to use sample weights.

1. Did you use a simple random sample, a structured random sample, or a self-weighting PPS sample?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
2. Did you correctly follow sampling procedures and contact all the individuals on the sampling list or, if you randomized the whole list, did you contact up to the person with whom you completed the last interview?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
3. Did you, if applicable, complete the required number of interviews in particular locations?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
4. Were your response rates high and roughly even among the important subgroups of your population?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
5. Did your replacement sample have the same probabilities of selection as your main sample? (Check with your statistician.)	<input type="checkbox"/> Yes	<input type="checkbox"/> No

If you answer yes to ANY of the following questions, you may need to use sample weights.

1. Did you use a cluster, stratified, or other type of complex sample?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
2. Did you use a simple sample or PPS sample and fail to carefully follow the instructions about where and whom to interview?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
3. Did you use replacement sampling in which your replacements had different chances of selection from your main sample? (Check with your statistician.)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
4. Did you sample by COE and not by child?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
5. Did you allocate interviews by quota (e.g., 30 per county) or some other method that was not proportional?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
6. Were you unable to complete your interviewing allocation in some areas (e.g., you were supposed to get 50 interviews but you got 42)?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
7. Do you suspect non-response bias because you had large or uneven non-response rates among different groups in your sample?	<input type="checkbox"/> Yes	<input type="checkbox"/> No



TOOL 16: REPORTING TEMPLATE

Person Completing Report: _____

Date: _____

Directions: Use the following template as a guide and the space below to make notes before typing your report. Important information includes who is responsible for obtaining this information and so on.

Introduction

Summarize your results and provide an overview of each section of the report.

Purpose

Describe the purpose of your re-interview process (prospective, retrospective, monitoring, rate generating, etc.)

Methodology

Provide an overview of your methodology.

Sampling

Interview Selection and Training

Data Collection

Analysis (include a description of how you calculated your defect rate or your discrepancy rate and any weights used)

Results

Provide the data you collected, and summarize your findings.

Include a table that clearly documents the number of children sampled, re-interviewed, and found ineligible (by subgroup, if applicable, and the response rate).

Group	Population	Children Sampled	Sampled Children with Re-interviews	Sampled Children Found Ineligible	Percentage Ineligible	Response Rate
Total						

Describe the reasons for child ineligibility.

Summarize your findings, including your defect rate or discrepancy rate, and any differences among subgroups (if applicable).

Summarize any non-response issues you encountered (e.g., large proportion of families moving or refusing).

Summarize any problems or special circumstances you encountered.

Conclusion

Describe what you will do based on your re-interview findings.

Appendices

Include a copy of any supporting documentation, such as your written sampling plan, interviewer manual, re-interview questionnaire, description of the re-interviewer hiring process, and re-interview procedures.

Appendix A: Sampling Plan

Appendix B: Re-interviewer Protocol

Appendix C: Re-interview Guide

Appendix D: Appeals Procedures

Appendix E: Data Analysis and Weighting (if applicable)

Appendix A

Glossary¹

36 Months – Length of eligibility as a migratory child based on the qualifying arrival date with the exception of graduation, age or death.

COE – (Certificate of Eligibility) A document that states must use to record eligibility determinations.

Emancipated Youth – children under the age of majority (in accordance with State law) who are no longer under the control of a parent or guardian and who are solely responsible for their own welfare.

GED – (General Education Development) An alternative diploma earned by a student.

Identification - Actively looking for and finding migrant children.

LOA – (Local Operating Agency) Local educational agencies, public or nonprofit private agencies, and State education agencies (if an SEA operates the MEP directly) are all eligible local operating agencies for the MEP. Usually, LOAs are the most immediate educational organization responsible for delivering ID&R, educational, and/or support services to migratory children and their families.

MEP – (Migrant Education Program) A federal program that provides funding to State education agencies for educational and educationally-related services for eligible migrant children.

Obtain - When a migratory worker begins working in qualifying agricultural or fishing work.

OME – (Office of Migrant Education) The office within the U.S. Department of Education that administers, at the national level, the Migrant Education Program and other federal education programs for migrant children, workers, and their families.

OSY – (Out of School Youth) Youth up through age 21 who are entitled to a free public education in the State and who meet the definition of “migratory child,” but who are not currently enrolled in a K-12 school.

QAD – (Qualifying Arrival Date) The date that a migratory child and a migratory agricultural worker/migratory fisher completed a move for the worker to obtain qualifying work.

Qualifying Move – A qualifying move is a move across school district boundaries, is a change from one residence to another residence, is made due to economic necessity, is made in order to seek or obtain qualifying work; and is a move that occurred not more than 36 months prior to the date of recruitment.

Qualifying Work – Temporary or seasonal employment in agricultural work or fishing work.

Quality Control – As it relates to ID&R systems, quality control is the process of ensuring the proper identification and recruitment of eligible migratory children.

Recruitment – The process of making contact with migrant families, explaining the MEP to them, obtaining the necessary information to make a determination that the child is eligible for the MEP, and recording the basis of the child’s eligibility on the COE.

Re-interview – The process of checking the eligibility determinations recorded on a State’s COEs. It involves conducting a second interview with families to check each criterion that makes children eligible for the MEP.

School District Boundaries – An administrative boundary established independently by each state’s Department of Education that marks the area a school district serves.

SEA – (State Education Agency) The designated agency ultimately responsible for the administration and operation of the MEP, including the identification & recruitment of migrant children.

Seasonal Employment – Employment that occurs only during a certain period of the year because of the cycles of nature and that, by its nature, may not be continuous or carried on throughout the year.

Seek– When agricultural or fishing work is/was actively pursued, but has not yet been or was not obtained.

‘To Join’ Moves – A child who is not a migratory agricultural worker or migratory fisher qualifies for the MEP if the child accompanies or “joins” a parent, spouse, or guardian who is a migratory agricultural worker or migratory fisher who moves in order to obtain qualifying work. In the case of “to join” moves, the child’s move may either precede or follow the worker’s move. The QAD is the date that the child and worker complete the move to be together. If the child’s move precedes the worker’s move, the qualifying arrival date is the date the worker arrived. If the child’s move followed the worker’s move, the qualifying arrival date is the date the child arrived.

Temporary Employment – Employment that lasts for a limited period of time, usually a few months, but no longer than 12 months.

Validation – The process of authenticating the eligibility determination on a COE. After validation, the COE information will be included in the state’s child count.

Verification – The process of confirming or supporting what is documented on the COE.

With – Children and/or youth move “with” a parent, spouse, or guardian when the child and/or youth and the worker move together and at the same time.

¹Adapted from documents developed by the “Consortium for Quality and Consistency in Identification and Recruitment (CONQIR)”.

Appendix B

please address your comments to the Desk Officer for Education, Office of Information and Regulatory Affairs, OMB, and send via e-mail to OIRA_DOCKET@omb.eop.gov or via fax to (202) 395-6974. Commenters need only submit comments via one submission medium. You may also send a copy of these comments to the Department representative named in the FOR FURTHER INFORMATION CONTACT section of this preamble. We consider your comments on these proposed collections of information in—

- Deciding whether the proposed collections are necessary for the proper performance of our functions, including whether the information will have practical use;
- Evaluating the accuracy of our estimate of the burden of the proposed collections, including the validity of our methodology and assumptions;
- Enhancing the quality, usefulness, and clarity of the information we collect; and
- Minimizing the burden on those who must respond. This includes exploring the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology; e.g., permitting electronic submission of responses.

OMB is required to make a decision concerning the collections of information contained in these proposed regulations between 30 and 60 days after publication of this document in the Federal Register. Therefore, to ensure that OMB gives your comments full consideration, it is important that OMB receives the comments within 30 days of publication.

Intergovernmental Review

This program is subject to the requirements of Executive Order 12372 and the regulations in 34 CFR part 79. The objective of the Executive Order is to foster an intergovernmental partnership and a strengthened federalism by relying on processes developed by State and local governments for coordination and review of proposed Federal financial assistance.

In accordance with the order, we intend this document to provide early notification of the Department's specific plans and actions for this program.

Electronic Access to This Document

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You may also view this document in text or PDF at the following site: <http://www.ed.gov/programs/mep/legislation.html>.

Note: The official version of this document is the document published in the Federal Register. Free Internet access to the official edition of the Federal Register and the Code of Federal Regulations is available on GPO Access at: <http://www.gpoaccess.gov/nara/index.html>.

(Catalog of Federal Domestic Assistance Number 84.011: Title I, Education of Migrant Children.)

List of Subjects in 34 CFR Part 200

Administrative practice and procedure, Adult education, Allocation of funds, Children, Coordination, Education of children with disabilities, Education of disadvantaged children, Elementary and secondary education, Eligibility, Family, Family-centered education, Grant programs—education, Indians—education, Institutions of higher education, Interstate coordination, Intrastate coordination, Juvenile delinquency, Local educational agencies, Local operating agencies, Migratory children, Migratory workers, Neglected, Nonprofit private agencies, Private schools, Public agencies, Quality control, Re-interviewing, Reporting and recordkeeping requirements, State-administered programs, State educational agencies, Subgrants.

Dated: July 18, 2008.

Kerri L. Briggs,
Assistant Secretary for Elementary and Secondary Education.

■ For the reasons discussed in the preamble, the Secretary amends part 200 of title 34 of the Code of Federal Regulations as follows:

PART 200—TITLE I—IMPROVING THE ACADEMIC ACHIEVEMENT OF THE DISADVANTAGED

■ 1. The authority citation for part 200 continues to read as follows:

Authority: 20 U.S.C. 6301 through 6378, unless otherwise noted.

■ 2. Revise § 200.81 to read as follows:

§ 200.81 Program definitions.

The following definitions apply to programs and projects operated under subpart C of this part:

(a) *Agricultural work* means the production or initial processing of crops, dairy products, poultry, or livestock, as well as the cultivation or harvesting of trees. It consists of work performed for wages or personal subsistence.

(b) *Fishing work* means the catching or initial processing of fish or shellfish or the raising or harvesting of fish or shellfish at fish farms. It consists of work performed for wages or personal subsistence.

(c) *In order to obtain*, when used to describe why a worker moved, means that one of the purposes of the move is to seek or obtain qualifying work.

(1) If a worker states that a purpose of the move was to seek any type of employment, i.e., the worker moved with no specific intent to find work in a particular job, the worker is deemed to have moved with a purpose of obtaining qualifying work if the worker obtains qualifying work soon after the move.

(2) Notwithstanding the introductory text of this paragraph (c), a worker who did not obtain qualifying work soon after a move may be considered to have moved in order to obtain qualifying work only if the worker states that at least one purpose of the move was specifically to seek the qualifying work, and—

(i) The worker is found to have a prior history of moves to obtain qualifying work; or

(ii) 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.

(d) *Migratory agricultural worker* means a person who, in the preceding 36 months, has moved, as defined in paragraph (g), from one school district to another, or from one administrative area to another within a State that is comprised of a single school district, in order to obtain temporary employment or seasonal employment in agricultural work, including dairy work.

(e) *Migratory child* means a child—

(1) Who is a migratory agricultural worker or a migratory fisher; or

(2) Who, in the preceding 36 months, in order to accompany or join a parent, spouse, or guardian who is a migratory agricultural worker or a migratory fisher—

(i) Has moved from one school district to another;

(ii) In a State that is comprised of a single school district, has moved from one administrative area to another within such district; or

(iii) As the child of a migratory fisher, 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.

(f) *Migratory fisher* means a person who, in the preceding 36 months, has moved, as defined in paragraph (g), from one school district to another, or from one administrative area to another within a State that is comprised of a single school district, in order to obtain temporary employment or seasonal employment in fishing work. This definition also includes a person who, in the preceding 36 months, resided in a school district of more than 15,000 square miles and moved, as defined in paragraph (g), a distance of 20 miles or more to a temporary residence in order to obtain temporary employment or seasonal employment in fishing work.

(g) *Move or Moved* means a change from one residence to another residence that occurs due to economic necessity.

(h) *Personal subsistence* means 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.

(i) *Qualifying work* means temporary employment or seasonal employment in agricultural work or fishing work.

(j) *Seasonal employment* means employment that occurs only during a certain period of the year because of the cycles of nature and that, by its nature, may not be continuous or carried on throughout the year.

(k) *Temporary employment* means employment that lasts for a limited period of time, usually a few months, but no longer than 12 months. It typically includes employment where the employer states that the worker was hired for a limited time frame; the worker states that the worker does not intend to remain in that employment indefinitely; or the SEA has determined on some other reasonable basis that the employment is temporary. The definition includes employment that is constant and available year-round only if, within 18 months after the effective date of this regulation and at least once every three years thereafter, the SEA documents that, given the nature of the work, of those workers whose children were previously determined to be eligible based on the State's prior determination of the temporary nature of such employment (or the children themselves if they are the workers), virtually no workers remained employed by the same employer more than 12 months.

■ 3. Amend § 200.83 as follows:

■ a. Redesignate paragraphs (a)(3) and (a)(4) as paragraphs (a)(4) and (a)(5),

respectively, and add a new paragraph (a)(3).

■ b. Revise the introductory text of redesignated paragraph (a)(4).

The revision and addition read as follows:

§ 200.83 Responsibilities of SEAs to implement projects through a comprehensive needs assessment and a comprehensive State plan for service delivery.

(a) * * *

(3) *Measurable program outcomes.* The plan must include the measurable program outcomes (i.e., objectives) that a State's migrant education program will produce to meet the identified unique needs of migratory children and help migratory children achieve the State's performance targets identified in paragraph (a)(1) of this section.

(4) *Service delivery.* The plan must describe the strategies that the SEA will pursue on a statewide basis to achieve the measurable program outcomes in paragraph (a)(3) of this section by addressing—

* * * * *

■ 4. Add § 200.89 to read as follows:

§ 200.89 MEP allocations; Re-interviewing; Eligibility documentation; and Quality control.

(a) *Allocation of funds under the MEP for fiscal year (FY) 2006 and subsequent years.* (1) For purposes of calculating the size of MEP allocations for each SEA for FY 2006 and subsequent years (as well as for supplemental MEP allocations for FY 2005), the Secretary determines each SEA's FY 2002 base allocation amount under section 1303(a)(2) and (b) of the Act by applying, to the counts of eligible migratory children that the SEA submitted for 2000–2001, the defect rate that the SEA reports to the Secretary and that the Secretary accepts based on a statewide retrospective re-interviewing process that the SEA has conducted.

(2)(i) The Secretary conditions an SEA's receipt of final FY 2007 and subsequent-year MEP awards on the SEA's completion of a thorough re-documentation of the eligibility of all children (and the removal of all ineligible children) included in the State's 2007–2008 MEP child counts.

(ii) To carry out this re-documentation, an SEA must examine its rolls of all currently identified migratory children and remove from the rolls all children it judges to be ineligible based on the types of problems identified in its statewide retrospective re-interviewing as causing defective eligibility determinations.

(b) *Responsibilities of SEAs for re-interviewing to ensure the eligibility of children under the MEP.*

(1) *Retrospective re-interviewing.*

(i) As a condition for the continued receipt of MEP funds in FY 2006 and subsequent years, an SEA that received such funds in FY 2005 but did not implement a statewide re-interviewing process prior to the enactment of this regulation, as well as an SEA with a defect rate that is not accepted by the Secretary under paragraph (a)(1) of this section, or an SEA under a corrective action issued by the Secretary under paragraph (b)(2)(vii) or (d)(7) of this section, must, within six months of the effective date of these regulations or as subsequently required by the Secretary,—

(A) Conduct a statewide re-interviewing process consistent with paragraph (b)(1)(ii) of this section; and

(B) Consistent with paragraph (b)(1)(iii) of this section, report to the Secretary on the procedures it has employed, its findings, its defect rate, and corrective actions it has taken or will take to avoid a recurrence of any problems found.

(ii) At a minimum, the re-interviewing process must include—

(A) Selection of a sample of identified migratory children (from the child counts of a particular year as directed by the Secretary) randomly selected on a statewide basis to allow the State to estimate the statewide proportion of eligible migratory children at a 95 percent confidence level with a confidence interval of plus or minus 5 percent.

(B) Use of independent re-interviewers (i.e., interviewers who are neither SEA or local operating agency staff members working to administer or operate the State MEP nor any other persons who worked on the initial eligibility determinations being tested) trained to conduct personal interviews and to understand and apply program eligibility requirements; and

(C) Calculation of a defect rate based on the number of sampled children determined ineligible as a percentage of those sampled children whose parent/guardian was actually re-interviewed.

(iii) At a minimum, the report must include—

(A) An explanation of the sample and procedures used in the SEA's re-interviewing process;

(B) The findings of the re-interviewing process, including the determined defect rate;

(C) An acknowledgement that, consistent with § 200.89(a), the Secretary may adjust the child counts for 2000–2001 and subsequent years

downward based on the defect rate that the Secretary accepts;

(D) A summary of the types of defective eligibility determinations that the SEA identified through the re-interviewing process;

(E) A summary of the reasons why each type of defective eligibility determination occurred; and

(F) A summary of the corrective actions the SEA will take to address the identified problems.

(2) *Prospective re-interviewing.* As part of the system of quality controls identified in § 200.89(d), an SEA that receives MEP funds must, on an annual basis, validate current-year child eligibility determinations through the re-interview of a randomly selected sample of children previously identified as migratory. In conducting these re-interviews, an SEA must—

(i) Use, at least once every three years, one or more independent interviewers (i.e., interviewers who are neither SEA or local operating agency staff members working to administer or operate the State MEP nor any other persons who worked on the initial eligibility determinations being tested) trained to conduct personal interviews and to understand and apply program eligibility requirements;

(ii) Select a random sample of identified migratory children so that a sufficient number of eligibility determinations in the current year are tested on a statewide basis or within categories associated with identified risk factors (e.g., experience of recruiters, size or growth in local migratory child population, effectiveness of local quality control procedures) in order to help identify possible problems with the State's child eligibility determinations;

(iii) Conduct re-interviews with the parents or guardians of the children in the sample. States must use a face-to-face approach to conduct these re-interviews unless circumstances make face-to-face re-interviews impractical

and necessitate the use of an alternative method such as telephone re-interviewing;

(iv) Determine and document in writing whether the child eligibility determination and the information on which the determination was based were true and correct;

(v) Stop serving any children found not to be eligible and remove them from the data base used to compile counts of eligible children;

(vi) Certify and report to the Department the results of re-interviewing in the SEA's annual report of the number of migratory children in the State required by the Secretary; and

(vii) Implement corrective actions or improvements to address the problems identified by the State (including the identification and removal of other ineligible children in the total population), and any corrective actions, including retrospective re-interviewing, required by the Secretary.

(c) *Responsibilities of SEAs to document the eligibility of migratory children.* (1) An SEA and its operating agencies must use the Certificate of Eligibility (COE) form established by the Secretary to document the State's determination of the eligibility of migratory children.

(2) In addition to the form required under paragraph (a) of this section, the SEA and its operating agencies must maintain any additional documentation the SEA requires to confirm that each child found eligible for this program meets all of the eligibility definitions in § 200.81.

(3) An SEA is responsible for the accuracy of all the determinations of the eligibility of migratory children identified in the State.

(d) *Responsibilities of an SEA to establish and implement a system of quality controls for the proper identification and recruitment of eligible migratory children.* An SEA must establish and implement a system of quality controls for the proper

identification and recruitment of eligible migratory children on a statewide basis. At a minimum, this system of quality controls must include the following components:

(1) Training to ensure that recruiters and all other staff involved in determining eligibility and in conducting quality control procedures know the requirements for accurately determining and documenting child eligibility under the MEP.

(2) Supervision and annual review and evaluation of the identification and recruitment practices of individual recruiters.

(3) A formal process for resolving eligibility questions raised by recruiters and their supervisors and for ensuring that this information is communicated to all local operating agencies.

(4) An examination by qualified individuals at the SEA or local operating agency level of each COE to verify that the written documentation is sufficient and that, based on the recorded data, the child is eligible for MEP services.

(5) A process for the SEA to validate that eligibility determinations were properly made, including conducting prospective re-interviewing as described in paragraph (b)(2).

(6) Documentation that supports the SEA's implementation of this quality-control system and of a record of actions taken to improve the system where periodic reviews and evaluations indicate a need to do so.

(7) A process for implementing corrective action if the SEA finds COEs that do not sufficiently document a child's eligibility for the MEP, or in response to internal State audit findings and recommendations, or monitoring or audit findings of the Secretary.

Authority: 20 U.S.C. 6391–6399, 6571, 7844(d); 18 U.S.C. 1001.

[FR Doc. E8–16859 Filed 7–28–08; 8:45 am]

BILLING CODE 4000-01-P