
Completing the Certificate of Eligibility (COE) During COVID-19

The Texas Education Agency is providing this guidance in response to the concerns regarding Identification and recruitment (ID&R) during the current Coronavirus (COVID-19) situation. TEA is aware this has restricted recruiters' abilities to meet with families in person. TEA recently provided a response to some questions regarding MEP ID&R in an FAQ. To access the FAQ please see the Federal Funding and Guidance FAQ under the Waivers, Finance and Grants section on the TEA Coronavirus webpage under Funding and Waivers. According to the United States Department of Education Office of Migrant Education, it would be acceptable for MEP staff to conduct recruitment activities via telephone or video conferencing. This would include holding interviews with potentially eligible migratory families to obtain information necessary to complete the Certificate of Eligibility (COE). As a result, the Texas MEP is implementing a new Certificate of Eligibility (COE) protocol that indicates how the COE may be completed without requiring a recruiter to meet in person with a potentially eligible family.

Effective immediately, when recruiters are completing the COE, they must follow this protocol.

1. Conduct recruitment activities via telephone or video conferencing until advised to resume face-to-face interviews.
2. If all the required information is collected on the COE except for the interviewee's signature, the MEP staff may proceed with its eligibility determination and COE approval process.
3. Add a note to the COE SDF Comments section explaining the circumstances that prevented the recruiter/interviewer from obtaining the interviewee's signature.
4. After normal activities resume, if MEP staff are able to contact the interviewee in-person, we recommend that the interviewee's signature be added to the COE and the Comments section be updated. Signatures may also be collected by mail.

TEA is aware that certain precautionary or containment measures taken in response to the pandemic such as school closures and social distancing can compound the challenges already faced by migratory families, such as access to health care and food assistance, social isolation, etc. Recognizing the key role that MEP staff often play in outreach and advocacy for migratory families, TEA urges MEP recruiters and other staff to use telephone or video contact as an opportunity to assess the immediate needs of migratory children and their families and work to

either address those needs directly or connect the families to other available resources for assistance.

Read each section of the protocol thoroughly before completing a COE by phone or video interview.

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Eligibility Interview Process

PREPARATION

To prepare for an eligibility interview during this time, the recruiter must follow these steps:

1. Research available resources for MEP and non-MEP families within your district or region.
2. Be prepared to share the MEP services that will be provided to the family if they are eligible.
3. Collect all necessary eligibility resources that may aid your eligibility determination.
4. Completing an eligibility interview over the phone is different than in person. Below are some additional tips that may be helpful.
 - Be mindful that it may be more difficult to gain the interviewee's trust over the phone.
 - Have a calendar, digital or paper, available for reference.
 - Be prepared to create a timeline of the family's moves using the Eligibility Checklist and Eligibility Flowchart.
 - Do not volunteer any student identifiable information.

CONDUCTING THE INTERVIEW

1. Identify yourself and purpose. (Sample Introductory sentence:
Good morning (afternoon, etc.). My name is _____ and I represent the _____ school district. Is this a convenient time to discuss if your child/children is/are eligible for our program services?)
2. To put the family at ease, begin the phone or video conversation by letting the individual know that the MEP is here to keep them informed about information and resources available to them during the Coronavirus pandemic.
3. Provide information about all available resources in the area and ask if they have any questions.
4. Conduct the eligibility interview by asking all relevant questions to determine if the family/youth is eligible for the MEP.

MEP ELIGIBILITY CRITERIA MET

1. If the family/youth is eligible, complete the COE, taking extra time to carefully review all the information with the interviewee.
2. The recruiter will write the following statement in the comment section of the COE SDF:
"Due to the pandemic, the interviewee [insert Full Name and relationship to the child(ren)] verified by phone interview the eligibility information on [insert date XX/XX/XX]."
3. The recruiter must follow these additional procedures:

- To complete the Interviewee signature section, take the following steps:
 - When asking for their verification, read all the statements in the interviewee's signature section regarding the MEP and FERPA and **check the box.**
 - The recruiter will write “**COVID-19 Interview**” on the interviewee's signature line, then will draw a dash (-) for the relationship to child(ren) and date in Section F of the COE.
 - Select the box for the language that was used during the interview.
 - On “Place of Interview” select “Other” and indicate how the interview was conducted.
 - The recruiter will then sign the COE electronically. For instructions how to electronically sign a PDF document (See PDF COE), please refer to instructions in the following link:
https://zoom.us/rec/play/tMB_Jbv5r203GdCTsgSDU_FwW43vKays03Qf-aJYmBvgWyZQMVeizbVEZetn92PoOFk6jsEMt-hg4xi-?startTime=1586449895000
 - The recruiter will then submit the COE to the Reviewer to electronically sign it as well. **(All communication regarding student information should be transmitted in an encrypted manner)**

MEP ELIGIBILITY CRITERIA NOT MET

1. If the family/youth is determined to be ineligible, it is still important to provide them with all available non-MEP funded resources in the area.

AFTER THE INTERVIEW

1. Thank the interviewee for their cooperation.
2. Remind the individual that the MEP is here to share information with them about the resources that are available during the Coronavirus pandemic and inquire if there is anything that the MEP can help with.
3. Inform the individual of any services that the MEP will provide during the pandemic.
4. If a COE was completed, secure the COE with all related information and follow the normal COE submission procedures.

Example COE Sections

COMMENTS SECTION OF THE COE SDF

Residency Verification for P2s Turning P3 (Complete when applicable.)

Person Interviewed _____ Date _____ Place of Interview _____

Qualifying Conditions that Require Comments (Check when applicable)

<input type="checkbox"/> (2bi) "To Join" Move	<input type="checkbox"/> Early Move
<input type="checkbox"/> (4a) Engaged in a new qualifying work more than 60 days after the move	<input type="checkbox"/> Qualifying Move to Homebase
<input type="checkbox"/> (4b) Actively sought new qualifying work AND has a history of moves for qualifying work	<input type="checkbox"/> Short Distance Move
<input type="checkbox"/> (6a) Temporary Employment (worker's statement)	<input type="checkbox"/> Short Duration Move (7 days or less)
<input type="checkbox"/> (6b) Temporary Employment (employer's statement)	<input type="checkbox"/> Unusual Qualifying Work

COMMENTS

Due to the pandemic, the interviewee [insert Full Name and relationship to the child(ren)] verified by phone interview the eligibility information on [insert date XX/XX/XXXX.]

SIGNATURE SECTION OF THE COE

F. INTERVIEWEE SIGNATURE

I understand the purpose of this form is to help the State determine if the child(ren)/youth listed on this form is/are eligible for the Title I, Part C Migrant Education Program. To the best of my knowledge, all of the information I provided to the interviewer is true.

The rules for migrant eligibility, services, student record transfer, and the Family Educational Rights and Privacy Act (FERPA) have been explained to me. I hereby authorize this school district, the Texas Education Agency, the New Generation System (NGS) and the Migrant Student Information Exchange (MSIX) to release, transfer, and/or receive my child's educational and health records, including immunization records and standardized test results, to/from other schools and educational agencies. To possibly qualify for more educational, health, or social services, I further consent that student/family information, including student/parent name, address, phone number, student date of birth, and student district/campus enrollment, otherwise confidential under the provisions of FERPA.

COVID-19 INTERVIEW

Signature

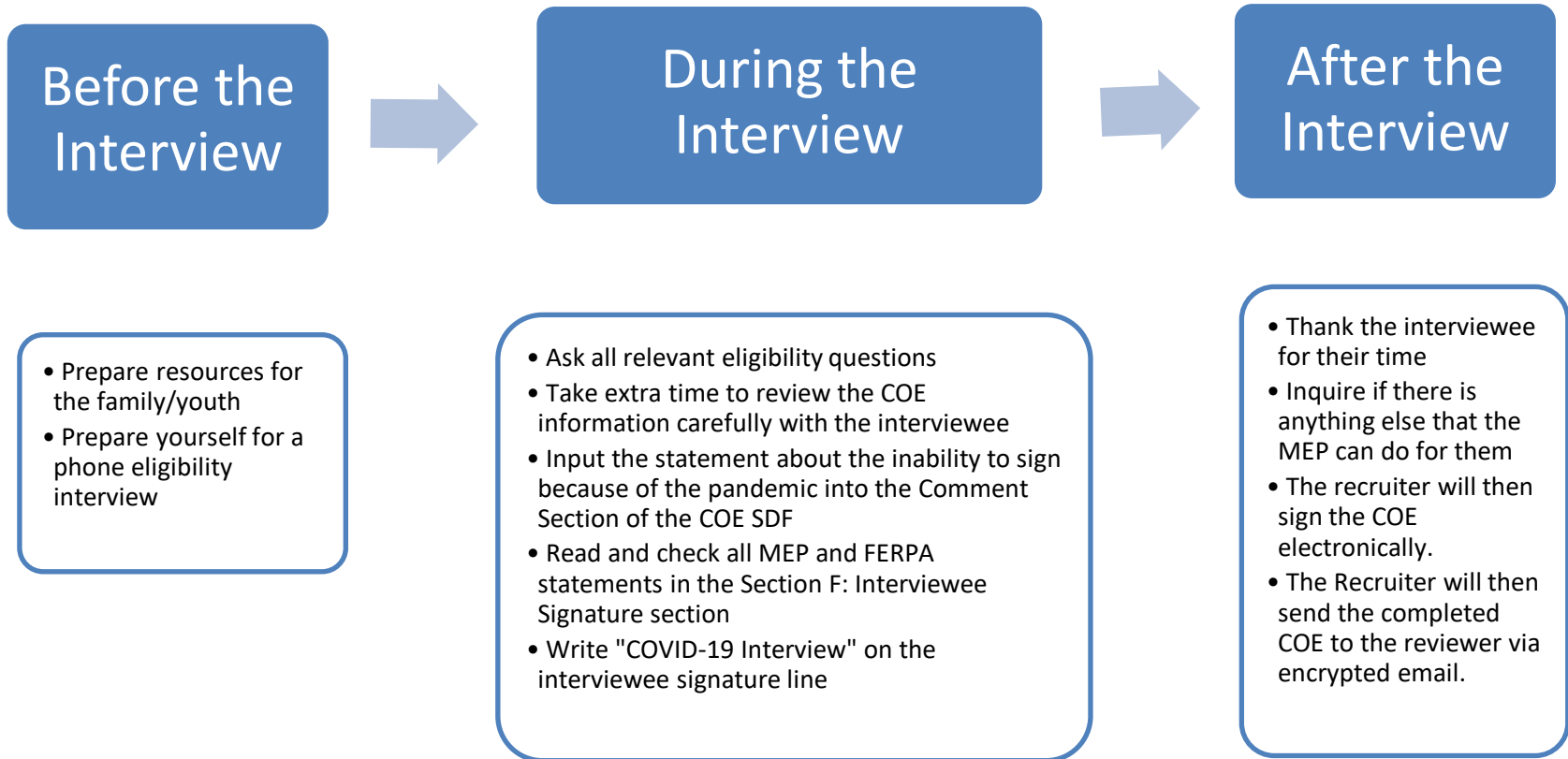
Relationship to child(ren)

Date (MM/DD/YY)

Language Used to Explain the Contents of This Document: English Spanish Other (specify):

Place of Interview: Home Visit Office Visit Other (specify): (Phone or teleconference)

COVID-19 COE Protocol Flowchart



Continued Residency Verification and Residency Verification for P2s turning P3

CONDUCTING RESIDENCY VERIFICATION

MEP staff must record residency verification on the COE each year between September 1 and November 1 for all COEs dated prior to September 1. To prepare for the Continued Residency Verification during this time, the recruiter must follow these steps:

1. If the COE is not available, please conduct Continued Residency Verification via phone or teleconference and document in a call log or document the necessary information:
 - “Reporting Period”
 - “RV Date”
 - “Method Used” please indicate how the interview was conducted (Phone or teleconference)
 - “Person Interviewed” write down the name of the interviewee.
 - “Signature of Person Interviewed” is not needed
 - “District/ESC Representative Signature / Date” write down the name of the interviewer and that date the interview was conducted.
2. If the COE is available please, please conduct the RV via phone or teleconference and record the necessary information on Section “H” of the COE:
 - “Reporting Period”
 - “RV Date”
 - “Method Used” please indicate how the interview was conducted (Phone or teleconference)
 - “Person Interviewed” write down the name of the interviewee.
 - “Signature of Person Interviewed” write down “COVID-19 Interview”
 - “District/ESC Representative Signature / Date” provide the signature of the interviewer and the date of the interview.
 - Additionally, in the “Comment” section of the COE SDF provide the following comment **“Due to the pandemic, the interviewee verified by phone or videoconference the residency of the following student(s)_____”**

CONDUCTING RESIDENCY VERIFICATION FOR P2S TURNING P3

MEP staff must record residency verification on the COE SDF for a P2 turning 3 on or after the child's 3rd birthday. To prepare for the Residency Verification during this time, the recruiter must follow these steps:

1. If the COE and SDF are not available, please conduct Continued Residency Verification via phone or teleconference and document in a call log or document the necessary information:
 - "Person Interviewed" write down the name of the interviewee.
 - "Date" write down the date the interview was conducted.
 - "Place of Interview" please indicate if the interview was conducted via "phone or teleconference"
2. If the COE is available please, please conduct the RV via phone or teleconference and record the necessary information on Section "H" of the COE:
 - "Reporting Period"
 - "RV Date"
 - "Method Used" please indicate how the interview was conducted (Phone or teleconference)
 - "Person Interviewed" write down the name of the interviewee.
 - "Signature of Person Interviewed" write down "COVID-19 Interview"
 - "District/ESC Representative Signature / Date" provide the signature of the interviewer and the date of the interview.
 - Additionally, in the "Comment" section of the COE SDF provide the following comment **"Due to the pandemic, the interviewee verified by phone or videoconference the residency of the following student(s)_____"**