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March 21, 2006

Control Number
ED-OIG/A06F0013

Sandy Garrett
State Superintendent of Public Instruction
Oklahoma State Department of Education
2500 North Lincoln Boulevard
Oklahoma City, Oklahoma 73105-4599

Dear Superintendent Garrett:

This **Final Audit Report**, entitled *Oklahoma State Department of Education's (Oklahoma) Migrant Education Program (MEP)*, presents the results of our audit. The purpose of the audit was to determine if Oklahoma implemented systems that accurately count the students eligible to participate in the program. Our review covered the period September 1, 2003, through August 31, 2004. We found that 121 of the 124 migrant children, from the three audited school districts, in our sample were ineligible. Based on the sample results, we project that Oklahoma included 1,211 ineligible migrant children from the three audited school districts in its State-wide migrant child count, which resulted in Oklahoma inappropriately expending \$509,000 in MEP grant funds. Our interviews with Oklahoma's MEP recruiters revealed that they did not understand the Federal requirements when enrolling students in the program.

BACKGROUND

The MEP is authorized under Title I, Part C of the Elementary and Secondary Education Act of 1965, as amended. Federal regulations define a MEP eligible migratory child as a child who is, or whose parent, spouse, or guardian is, a migratory agricultural worker, including a migratory dairy worker, or a migratory fisher, and who, in the preceding 36 months, has moved from one school district to another, to obtain temporary or seasonal employment in agricultural or fishing work. The goal of the MEP is to ensure that all migrant students reach challenging academic standards and graduate with a high school diploma or its equivalent, a General Education Development (GED) certificate, that prepares them for responsible citizenship, further learning, and productive employment. Federal funds are allocated by formula to state education agencies, based on each state's per pupil expenditure for education and counts of eligible migratory children, aged 3 through 21, residing within the state. Oklahoma's MEP authorized funding for award year 2003-2004 was \$2,076,465. A total of 4,945 migrant children were counted in the MEP during the award year.

Our mission is to promote the efficiency, effectiveness, and integrity of the Department's programs and operations

On July 6, 2004, the U. S. Department of Education's Office of Migrant Education (OME) requested that each state complete a re-interview of the migrant child count for the year 2003/2004. This was voluntary but highly recommended. Oklahoma has decided to complete the re-interview project and plans to have it completed on or before September 2006.

AUDIT RESULTS

Oklahoma did not implement a system that accurately counted the migrant children eligible to participate in the migrant education program.

FINDING NO. 1 – Oklahoma State Department of Education Included Ineligible Migrant Children in their 2003/2004 Count

Oklahoma did not implement systems that accurately counted students eligible to participate in the MEP. Specifically, 121 of 124 (98%) students reviewed in three districts (Guymon, Clinton and Poteau) were ineligible to participate in the migrant program. We selected a 10% unbiased random sample for each of the three districts, reviewed the Certificate of Eligibility (COE)¹ for the 124 migrant students, and conducted interviews with family members. Based on those reviews and interviews, we determined that 121 of the sampled students were ineligible and an additional 173 siblings were also ineligible. Based on the results of the random sample, we project that out of a universe of 1,242 migrant children in the three districts, 1,211 migrant children were ineligible. At a calculated rate of \$419.91 per student, we estimate that Oklahoma expended an overpayment of \$509,000.²

During our review of the MEP, we identified two major areas for which the children were considered ineligible. One hundred and twenty-one (121) migrant children were ineligible based on eligibility requirements set forth in 20 U.S.C. § 6399(2) and 34 C.F.R. § 200.81(d).

Migrant Eligibility

Pursuant to 34 C.F.R. § 200.81(d), "*Migratory child* means a child who is, or whose parent, spouse, or guardian is, a migratory agricultural worker . . . and who, in the preceding 36 months, in order to obtain, or accompany such parent, spouse, guardian in order to obtain, temporary or seasonal employment in agricultural or fishing work . . . has moved from one school district to another."

¹ A COE is a form to document migrant eligibility.

² Questioned costs were based on a rate of \$419.91 per ineligible migrant child. The calculation was based on the count reported for the 2003/2004 school year, which was 4,945, and the amount of Migrant funds received for the same year, \$2,076,465 ($\$2,076,465/4945 = \419.91). See attachment for details of calculation.

To determine whether Oklahoma had adequate systems in place to correctly identify and count eligible migrant students, we selected a 10% unbiased random sample at the three districts audited—Guymon, Clinton, and Poteau. We reviewed the COE for 124 children identified as migrant students in those three school districts. Based on the COE reviews and re-interviewing some families, we determined that 121 children were ineligible migrant children because the families did not meet the basic requirements set forth in 34 C.F.R. § 200.81(d). For 65 of the 121 families, the families either did not make a qualifying move (39), did not work in a qualifying job (14), did not have the intent of working in a temporary agriculture field which is required to be considered an eligible migrant child (9), were ineligible due to the age of the child (1), or an error was made by the district recruiter (2). During our work in one district, we identified several families who have lived in the district for several years, and one family that had lived there since the 1960s. Additionally, we identified 99 siblings of the ineligible migrant students who also were not eligible migrant children. As a result, Oklahoma inappropriately expended \$68,865 in migrant funds for 164 ineligible migrant children. A breakdown of our finding for each school district is shown in the Attachments to this report.

Temporary versus Permanent Work

In addition to the above 65 ineligible migrant children identified as not meeting the migrant eligibility requirements, we also identified 56 ineligible migrant children whose families worked in positions that were not temporary or seasonal. The positions were permanent and available year-around at processing plants or in livestock farming.

Based on the information provided on the COEs, we identified 56 ineligible migrant children in our sample, and an additional 74 siblings who also were ineligible migrant children. Although the guidance allows a state to complete an industrial survey to establish permanent positions as temporary positions, Oklahoma did not complete the industrial survey nor did Oklahoma have any alternative documentation that showed how they determined those jobs were temporary. In lieu of conducting the required surveys, Oklahoma accepted letters from the processing plants self-certifying their turnover rates.

Additionally, the jobs at the processing plants and livestock farms do not meet the definition of temporary. According to 34 C.F.R. § 200.81(c) a “Migratory agricultural worker means a person . . . in order to obtain **temporary** or seasonal employment in agricultural activities (including dairy work) as a principal means of livelihood.” Although the regulation does not define temporary, Merriam Webster Online Dictionary defines temporary as “**lasting for a limited time**” (Emphasis Added). The enrollment records that we reviewed for the migrant children in our sample showed that many of the children were enrolled in the districts for three or four years. Therefore, employment at the processing plants and livestock farming are not for a limited time.

On October 23, 2003, OME issued Draft Non-Regulatory Guidance, Section L, which allows states to classify permanent positions as temporary positions if an industrial survey is conducted. The guidance states: “An industrial survey is an alternate way to establish that work that is available year-round is ‘temporary’ for purposes of the MEP because of a high degree of turn

over, frequent layoffs without pay, or few or no opportunities for permanent full-time employment. An industrial survey may only be used for specific job categories in which workers are engaged in qualifying work. Furthermore, SEAs may only rely on an industrial survey if the survey meets all of the requirements in this section.”

Some of the significant requirements of the Industrial Survey are as follows:

- Analyze the data to determine if the turnover rate is sufficiently high for the job to be considered temporary.
- Prepare a summary report that documents the process of the industrial survey and the findings regarding each job category.
- Description of how turnover information was obtained.
- The date the survey was conducted, the survey’s expiration date, and pertinent explanatory comments.
- The Draft Guidance also provides the formula of how to calculate the turnover rate.

Because the jobs held by the children’s parents were not temporary, we determined 56 students and 74 of their siblings to be ineligible migrant students. As a result, Oklahoma inappropriately expended \$54,588 in migrant funds for 130 ineligible migrant students. This occurred because the recruiters stated they had received little to no training and they did not receive a copy of the Non-Regulatory Draft Guidance until the beginning of the 2004/2005 school year. Additionally, all the forms and guidance from the U.S. Department of Education are written in English while many of the families and recruiters have limited English proficiency. Consequently, the recruiters did not fully understand the regulations and guidance on classifying children as eligible migrant children, and the Oklahoma Department of Education did not implement adequate controls to ensure that all children counted as eligible migrants met the regulatory requirements.

Based on the results of the random sample, we project that out of a universe of 1,242 migrant children in the three districts, 1,211 migrant children were ineligible. As a result of the high error rates in each of the three districts reviewed, we estimated that Oklahoma inappropriately expended \$509,000³ in migrant education funding based on the three-audited districts. Additionally, because the migrant count in those districts was overstated, the Department has no assurance that other Oklahoma districts accurately counted migratory children for the 2003/2004 migrant children count, as well as other counts performed by Oklahoma since 2003/2004. Based on our review we concluded that Oklahoma did not have sufficient internal controls in place to ensure an accurate migrant child count. During the exit conference, the Migrant Director stated that due to the results of the OIG review that Oklahoma has now decided to complete the re-interview for the state.

³ The estimated questioned cost is calculated at a rate of \$419.91 for 1,211 ineligible migrant children. $419.91 * 1,211 = 508,511$.

Recommendations

We recommend that the Assistant Secretary for the Office of Elementary and Secondary Education require the Oklahoma Department of Education to:

- 1.1 Conduct a State-wide migrant child count for the \$2,076,465 of MEP funds allocated to Oklahoma in fiscal year 2003/2004, as well as for subsequent years, and return to the Department any funds expended for ineligible children. For the three districts we audited, we estimate that \$509,000 should be returned for the period covered by the audit.
- 1.2 Establish adequate controls to ensure recruiters understand and follow Federal requirements when identifying and recruiting children into the program.
- 1.3 Implement internal controls to ensure future migrant child counts are accurate.

Oklahoma's Comments

In Oklahoma's response to the OIG draft report, Oklahoma neither agrees nor disagrees with the OIG audit finding. However, Oklahoma stated that they are investigating the finding, gathering additional information regarding MEP eligibility, and are working closely with OME to prepare a corrective action plan to improve current procedures and ensure compliance with Federal requirements.

Oklahoma disagrees that they did not complete the required Industrial Surveys. Oklahoma contends that the Draft Non-Regulatory Guidance (DNRG) allows SEAs to use sample comparable workplaces to conduct an industrial survey. Oklahoma contends that they complied with and met the industrial survey requirements. Oklahoma said they conduct a statewide videoconference every August before the school year begins to provide training for recruitment and data collection for migrant staff and that the DNRG was provided for all participants.

Oklahoma maintains that all MEP and local district staff, such as the migrant state recruiter, teachers, assistants, and records clerk, recruit migrant children through personal interviews either at home or school, and update existing COEs through the verification process of SEA monitoring visits, telephone interviews, home visits, and school records. Oklahoma asserts that Oklahoma staff (migrant director, migrant coordinator, and state recruiter) conducts ongoing professional development in the areas of recruiting efforts, accuracy of COEs, data collection, and MEP guidance.

Oklahoma said they volunteered to complete the re-interview process. But by January 2005, Oklahoma did not have sufficient migrant funds to conduct the re-interview process and had not identified any vendor to conduct the audit. It was later learned that states could use migrant consortium monies to fund the re-interview project, which Oklahoma plans to complete on or before September 2006.

Oklahoma stated that they send out forms in Spanish, including Pre-Information forms and COEs, and the state director regularly communicates (via telephone, email, and videoconference) with recruiters, records clerks, teachers, and parents in Spanish, as needed. Oklahoma asserted their commitment to providing accurate information and appropriate technical assistance and professional development and outlined a five-step corrective action plan. They vow to continue

to collaborate with the U.S. Department of Education's Office of Migrant Education to develop and carry out this plan in a manner that is consistent with Federal program and grants management requirements.

OIG's Response

After reviewing Oklahoma's response, we have not changed our finding or recommendations. Oklahoma's response did not provide any information to contradict our finding that the Oklahoma Migrant Education Office did not adequately count migrant children. However, we included in the audit report that Oklahoma has decided to complete the re-interview project and plans to have it completed on or by September 2006.

Oklahoma stated that they are "investigating this finding and gathering additional information regarding MEP eligibility." They have also provided a corrective action plan to ensure an accurate migrant child count in the future. However, for the response to the Draft Audit Report, they did not provide the OIG any new or additional information that would change the findings and recommendations.

Oklahoma disagreed that they have not provided training to their recruiters for the identification and recruitment of migrant children. We reviewed the documentation provided; however, from speaking with the recruiters, they informed us that they do not have a sufficient understanding of all the requirements. The recruiters also told us that they did not receive the Draft Guidance until the 2004/2005 school year.

Oklahoma also disagreed with the portion of our finding related to the Industrial Survey. Oklahoma believes they obtained sufficient information from the processing plants. However, from our review of the documentation, we disagree that the letters from various plants support a conclusion that positions at the processing plants are temporary. One letter even stated, "[S]eaboard hires the employees as probationary employees (usually 60 to 90 days). After successful completion of this introductory period these employees are considered regular full time employees instead of temporary employees." Also, the documentation provided showed that several of the positions did not have the 50 percent turnover rate. Although the guidance provides for alternatives, the information should be sufficient to support that the positions are temporary. On several occasions during the audit, the OIG auditors requested a complete Industrial Survey. However, we were never provided anything more than the letters.

OBJECTIVE, SCOPE, AND METHODOLOGY

The objective of our audit was to determine whether Oklahoma implemented systems that accurately counted the students eligible to participate in the migrant education program. To accomplish the audit objectives, we interviewed officials from Oklahoma's MEP. In addition, we conducted interviews and verified the information included in the COEs with the parents of MEP participants. We performed our fieldwork at the State Department of

Education's offices in Oklahoma City, Oklahoma from May 16 – May 20, 2005, and we held an exit conference with Oklahoma on September 29, 2005.

To verify the information included on the COE, we interviewed 68 MEP participants at their homes within the school districts of Guymon, Clinton, and Poteau, Oklahoma. The interviews in Guymon were conducted from June 20 – June 29, 2005; in Clinton from July 18 – July 22, 2005 and August 11 – 12, 2005; and in Poteau from August 8 – 10, 2005. For the remaining 56 migrant children in our sample we made the eligibility determination based on the COE.

We selected a 10% unbiased random sample of the MEP participants from the two largest migrant school districts and the largest school district with migrant children but did not have a migrant program for the award period July 1, 2003, through June 30, 2004, from the list provided by Oklahoma. At Guymon, we randomly selected 53 migrant children out of a universe of 530. At Clinton, we randomly selected 55 migrant children out of a universe of 554. At Poteau, we randomly selected 16 migrant children out of a universe of 158.

We relied on computer-processed data provided by Oklahoma. To test the reliability and completeness of Oklahoma's data, we verified that the students were enrolled in the school district in 2003/2004, that each student had the required COE, and we attempted to interview the family of the students in our sample. For the siblings of the students, we also verified if they were included on the list for each district. We concluded that the data provided by Oklahoma was sufficiently reliable to use in meeting the audit's objective. Our testing disclosed instances of non-compliance with Federal regulations that led us to conclude that internal control weaknesses existed in each of the three districts audited.

Our audit was performed in accordance with generally accepted government auditing standards appropriate to the scope of the review described above.

ADMINISTRATIVE MATTERS

Statements that managerial practices need improvements, as well as other conclusions and recommendations in this report, represent the opinions of the Office of Inspector General. Determinations of corrective action to be taken will be made by the appropriate Department of Education officials.

If you have any additional comments or information that you believe may have a bearing on the resolution of this audit, you should send them directly to the following Education Department official, who will consider them before taking final Departmental action on this audit:

Henry Johnson
Assistant Secretary
Office of Elementary and Secondary Education
400 Maryland Avenue SW
FOB – 6, Room Number 3W314
Washington D.C. 20202

It is the policy of the U. S. Department of Education to expedite the resolution of audits by initiating timely action on the findings and recommendations contained therein. Therefore, receipt of your comments within 30 days would be appreciated.

In accordance with the Freedom of Information Act (5 U.S.C. §552), reports issued by the Office of Inspector General are available to members of the press and general public to the extent information contained therein is not subject to exemptions in the Act.

Sincerely,

/s/

Sherri L. Demmel
Regional Inspector General
for Audit

Attachments

Attachment 1 Ineligible Migrant Students Per District

A summary of our results at the three audited districts is as follows:

Oklahoma	<u>Guymon</u>	<u>Clinton</u>	<u>Poteau</u>	<u>Total</u>
Sample Size	53	55	16	124
200.81(d) Basic Eligibility Requirements				
No Qualifying Move	6	28	5	39
No Qualifying Job/Work	7	6	1	14
Ineligible Intent	3	5	1	9
Age Ineligible	0	1	0	1
Error Made by District Recruiter	2	0	0	2
Ineligible – Permanent Jobs	35	12	9	56
Total Ineligible	53	52	16	121
Siblings				
Sample Size	65	93	19	177
200.81(d) Basic Eligibility Requirements				
No Qualifying Move	3	57	4	64
No Qualifying Job/Work	12	6	1	19
Ineligible Intent	3	8	1	12
Age Ineligible	2	2	0	4
Error Made by District Recruiter	0	0	0	0
Ineligible – Permanent Jobs	45	16	13	74
Total Ineligible	65	89	19	173
Total Ineligible Based on 200.81(d) Requirements (Sample + Siblings)	38	113	13	164
Total Ineligible – Permanent Jobs	80	28	22	130
Total Students Reviewed	118	148	35	301
Total Ineligible	118	141	35	294
Error Rate (Total Ineligible/Sample Size)	100%	95%	100%	98%

Attachment 2

Questioned Cost Per District

We questioned cost based on a rate of \$419.91 per ineligible migrant child. The calculation was based on the count reported for the 2003/2004 school year, which was 4,945, and the amount of Migrant funds expended for the same year, \$2,076,465 ($\$2,076,465/4945 = \419.91). Based on Oklahoma's Single Audit Report for the year ending June 30, 2004, Oklahoma expended \$2,120,840; therefore, Oklahoma expended all of the Migrant funds awarded, \$2,076,465, for the 2003/2004 Migrant Child Count.

Guymon:

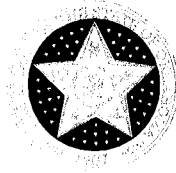
We reported 118 ineligible migrant children based on our review of the migrant child count for 2003/2004 for the Guymon School District. Guymon expended \$49,549 in ineligible migrant funds for those students. Based on the audited results of the unbiased random sample, we projected that out of a universe of 530 migrant children we can consider 530 migrant children ineligible based on the 100% error rate. At a calculated rate of \$419.91, we estimate that Oklahoma expended \$222,552 in ineligible migrant funds.

Clinton:

We reported 141 ineligible migrant children based on our review of the migrant child count for 2003/2004 for the Clinton School District. Clinton expended \$59,207 in ineligible migrant funds for those students. Based on the audited results of the unbiased random sample, we projected that out of a universe of 554 migrant children we can consider 523 migrant children ineligible based on the 95% error rate. At a calculated rate of \$419.91, we estimate that Oklahoma expended \$219,613 in ineligible migrant funds.

Poteau:

We reported 35 ineligible migrant children based on our review of the migrant child count for 2003/2004 for the Poteau School District. Poteau expended \$14,697 in ineligible migrant funds for those students. Based on the audited results of the unbiased random sample, we projected that out of a universe of 158 migrant children we can consider all 158 migrant children ineligible based on the 100% error rate. At a calculated rate of \$419.91, we estimate that Oklahoma expended \$66,346 in ineligible migrant funds.



**SANDY GARRETT
STATE SUPERINTENDENT OF PUBLIC INSTRUCTION
STATE OF OKLAHOMA**

January 13, 2006

Sherri Demmel
Regional Inspector General for Audit
1999 Bryan Street
Suite 1440
Dallas, Texas 75201

Dear Ms. Demmel:

On December 15, 2005, the United States Department of Education, Office of Inspector General, issued Draft Audit Report Control Number ED-OIGA06F0013. This Draft Audit Report presented the results of OIG's audit of Oklahoma's Department of Education, Migrant Education Program (OKMEP).

The Oklahoma Department of Education has the following response to the findings contained in the draft audit report.

RESPONSE

The draft audit findings state that during the covered period OIG found that 121 of the 124 migrant children from the three audited school districts in the sample were ineligible. Based on the sample results, the OIG project that Oklahoma has 1,211 ineligible migrant children, and estimate that Oklahoma inappropriately received \$508,511 in MEP grant funds.

OKMEP is investigating this finding and gathering additional information regarding MEP eligibility. OKMEP is also working in close cooperation with MEP officials from the U.S. Department of Education to prepare a corrective action plan that will improve current procedures and institute new procedures that will ensure that federal migrant program funds are spent in accordance with federal requirements.

Findings with supporting documentation

Industrial Survey

One OIG finding states that OKMEP did not complete an industrial survey, nor did OKMEP have any alternative documentation that showed how they determined those jobs were temporary. In lieu of conducting the required surveys, OKMEP accepted letters from the processing plants self-certifying their turnover rates.

- As stated in the Draft Non-Regulatory Guidance, SEAs may use sample comparable workplaces to conduct an industrial survey.

This finding goes on to state some of the significant requirements of the industrial survey.

- The OKMEP completed the following industrial survey requirements:
 1. identified the employer for the district;
 2. identified location: Guymon (Seaboard Farms, Inc.); Owasso (National Steak and Poultry); Ponca City (Tyson Foods Inc.); Altus (Bar S Foods Co.); Commerce (Fresh Solutions Inc., Englebrecht Farms, Inc., Jurgensmeyer Mushroom Inc., Foods/Ports Inc., JM Farms); Heavener (OK Farms Inc.);
 3. districts contacted the local employer with letter of explanation of the data needed and why;
 4. OKMEP obtained the survey from each district sampled;
 5. OKMEP analyzed the data to determine if the turnover rate met the 50% turnover rate as prescribed by the DNRG for the job to be considered temporary; (As a result of this survey, one particular district's migrant program was terminated due to employees' jobs not meeting the 50% turnover rate);
 6. OKMEP approved the survey for each district participating in the sample
 7. a summary report was created indicating the date(s) the surveys were conducted, with explanatory comments as to how the turnover information was obtained.

Training

Under Recommendations in the draft audit report 1.2, it states that the OKMEP establish adequate controls to ensure recruiters understand and follow Federal requirements when identifying and recruiting children into the program.

- The OKMEP conducts a statewide videoconference (agenda electronically attached) every August before the school year begins to provide training for recruitment and data collection for migrant staff. DNRG was provided for all participants.
- All MEP and local district staff, such as the migrant state recruiter, teachers, assistants, and records clerk, recruit migrant children through personal interviews either at home or school, and update existing COEs through the verification process of SEA monitoring visits, telephone interviews, home visits, and school records.
- Ongoing professional development is conducted by the OKMEP staff (migrant director, migrant coordinator, and state recruiter), in the areas of recruiting efforts, accuracy of COEs, data collection, and MEP guidance. See attached agenda.

Re-Interview Process

On July 26, 2004, the U.S. Department of Education's Office of Migrant Education requested that each state complete a re-interview of the migrant child count for the 2003-2004. This was a voluntary process, but highly recommended.

- Contrary to the audit report, Oklahoma did volunteer to complete the re-interview process. By January of 2005, the OKMEP did not have sufficient migrant funds to conduct the re-interview process and had not identified any vendor to conduct the audit. It was later learned that states could use migrant consortium monies to fund the re-interview project which the OKMEP plans to do on or before September 2006.

Communications with MEP staff and families

The audit states that forms and guidance from the Oklahoma State Department of Education are written in English; however families and recruiters often tend to be limited English proficient.

- The OKMEP sends out forms that are in Spanish, including Pre-Information forms and COEs. The state director regularly communicates (via telephone, email, and videoconference) with recruiters, records clerks, teachers, and parents in Spanish, as needed.

The audit report states that recruiters did not receive a copy of the DNRG until the beginning of the 2004-2005 school year.

- A memo dated February 19, 2004, was sent from the OKMEP to all migrant sites with the copy of the DNRG attached.
- A meeting was held on March 8, 2004 at the Guymon Videoconference center for Boise City, Texhoma, Hooker, Tyrone, Yarbrough, Keyes, Turpin, and Guymon.
- The Migrant DNRG is available on the SDE website (<http://sde.state.ok.us>). See attached electronic memos.

Oklahoma takes very seriously the responsibility of providing accurate information and appropriate technical assistance and professional development and continually works to provide these services.

The corrective action plan that OKMEP will take is as follows:

1. **Develop a more comprehensive industrial survey in accordance with the 2003 draft non-regulatory guidance.** The revision of the Industrial Survey is to be completed by July of 2006.
2. **Conduct an independent audit of migrant child eligibility determinations.** The OKMEP will contract with an independent reviewer to select and test (through re-interviewing) a statewide random sample of migrant child eligibility determinations. In developing the sample and analytic procedures, the auditor will develop appropriate strategies to deal with the likely situation that a large number of children in the initial sample can not be located and might therefore bias the sample and results. The re-interview process is to be completed by September of 2006.

3. **Improve identification and recruitment through improved quality control system.**

OKMEP will immediately implement the practice of re-interviewing randomly selected families upon completion of a Certificate of Eligibility by a recruiter, as well as other measures identified in this plan to improve the quality of guidance, training, and supervision of recruiters. Training for recruiters will continue to be an ongoing process in all areas of migrant education.

4. **Identify and remove all ineligible children.**

If a non-zero defect rate in Oklahoma's child eligibility determination is found in the re-interview process, OKMEP will review all children currently identified as eligible for the MEP and determine whether or not they are eligible. This process will be completed by December of 2006.

5. **Revise the child count data from prior years based on the results of the interviewing process.**

This procedure will occur at the conclusion of the re-interview process and will correct any fiscal deficiencies occurring as a result of incorrect eligibility determinations.

Conclusion

The Oklahoma Department of Education Migrant Education Program recognizes the important task of implementing a system that accurately counts migrant children eligible to participate in the migrant education program. The OKMEP will continue to collaborate with the USDE's Office of Migrant Education to develop and carry out this plan in a manner that is consistent with federal program and grants management requirements.

Sincerely,

EDITED

Frank Rexach, Director, Migrant Education
Oklahoma State Department of Education