



Bureau of Federal Educational Programs Florida Migrant Education Program

Remote Certificate of Eligibility (COE) Completion Protocol September 2023

Introduction

On July 28, 2022, the United States Department of Education Office of Migrant Education (OME) sent a letter to clarify OME’s policy regarding “the use of remote methods (telephone, video conference and other electronic means) to identify and recruit eligible migratory children.” In the letter, OME encourages States to conduct “recruitment interviews in-person if considered safe and practical given local conditions.”

However, OME does recognize that there could be extenuating circumstances when conditions render in-person contact with migratory families unsafe or impractical. In these cases, the State may use its discretionary authority to allow remote recruiting and waive the interviewee signature on the Certificate of Eligibility (COE). OME clarified that only the interviewee’s signature can be waived – **the recruiter and SEA-designated reviewer must still sign and date the COE.**

This Florida Migrant Education Program (FMEP) Remote COE Completion Protocol (September 2023) is authorized for use effective immediately and replaces the FMEP COVID-19 COE Completion Protocol released in September 2020. The Remote COE Completion Protocol contains three sections: technical assistance on determining when remote eligibility interviews may be conducted, the process for completing COEs based on remote interviews, and examples of what to write on COEs completed via remote interviews.

Conducting Remote Interviews

Local Educational Agencies (LEAs) or Local Operating Agencies (LOAs) should strive to conduct eligibility interviews with migratory children and families in-person. Benefits of face-to-face eligibility interviews include:

- Parent signature is collected immediately.
- Residency in the LEA is verified.
- Immediate services and assistance can be provided at the time of the interview.
- Informal needs of children and families can be determined.

Remote Interview Methods

FMEP does not require LEAs to use any specific software or hardware when conducting remote interviews. Remote interviews are typically conducted using phone calls or video calls.

Maintaining Remote Interview Records

As indicated by the OME remote recruitment letter, “MEP staff should keep and maintain for review, monitoring or auditing contemporaneous records of remote interviews for the same duration as the COEs those records support, in accordance with record retention requirements in 2 C.F.R. § 200.334.”

FMEP Remote Interview COE Completion Process

COE Comments and Interviewee Signature

For Florida COEs completed using remote interview methods, the recruiter will:

- In the COE comments section (Section IV), write the following statement:

“The following [*conditions*] made a face-to-face interview [*unsafe* or *impractical*]: [*describe the conditions*]. The interviewee, [*interviewee’s first and last name and relationship to the migratory child(ren)*], verified all eligibility information via [*remote interview method*] and gives permissions as marked in Section V.”

- In the interviewee signature section of the COE (Section V):
 - Write either **“Impractical to obtain”** or **“Safety concern”** on the interviewee’s signature line.
 - Write the relationship of the interviewee to the child(ren).
 - Enter the date of the remote interview.
 - Check “Yes” or “No” for the permission statements in Section V.

Sample Remote COE Completion Statements

The following statements are examples of statements recruiters may use in the COE comments section when describing the conditions that made a face-to-face interview unsafe or impractical. These examples are not exhaustive, and recruiters should clearly describe the specific conditions they encountered.

Sample Impractical Conditions Statements:

“The following conditions made a face-to-face interview impractical:”

- “After multiple attempts to visit family, family was only available by phone.”
- “Family is not available in person.”
- “Family remains at work until late at night and is unable to meet face-to-face.”
- “Family’s home is several hours away, making a home visit cost prohibitive.”

Sample Unsafe Conditions Statements:

“The following conditions made a face-to-face interview unsafe:”

- “Family was only available late at night and recruiter felt unsafe.”
- “Recruiter observed suspicious activity in the area.”
- “Recruiter was unfamiliar with the location and felt unsafe recruiting alone.”
- “Due to [*weather condition, such as ‘tornado,’ ‘hurricane,’ ‘wildfire’*], in-person visit was unsafe.”

When to Collect Interviewee’s Signatures

Efforts should be made to collect the interviewee signatures for COEs completed remotely once the conditions in the area are “safe and practical.” Signatures may be completed during the provision of services, when verifying residency or during another in-person interaction with the original interviewee. The effort to collect the signatures should take place within the performance period when the remote COE completion takes place, if feasible. LEAs should document efforts to obtain the interviewee’s signature and maintain those records in accordance with Federal and State records retention requirements.

Appendix A: Examples of Remote Interview COE Completion

Impractical Conditions Example

Section IV: Comments – Impractical Conditions Remote COE Completion Example

SECTION IV: COMMENTS (Must include <input type="checkbox"/> 2bi, <input type="checkbox"/> 4a, <input type="checkbox"/> 4b, <input type="checkbox"/> 5*, <input type="checkbox"/> 6a, and <input type="checkbox"/> 6b of the Sec III: Qualifying Moves & Work Section, if applicable.)
<i>The following conditions made a face-to-face interview impractical: the interviewee remains at work until late at night and is unable to meet face-to-face. The interviewee, Mario Lopez (child's father), verified all eligibility information via phone and gives permissions as marked in Section V.</i>

Section V: Interviewee Signature – Impractical Conditions Remote COE Completion Example

SECTION V: 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.		
<u>Impractical to obtain</u>	<u>Father</u>	<u>04/01/2023</u>
Signature	Relationship to the child(ren)	Date
<i>Check all that apply</i>		Yes / No
1. I give my permission for my child(ren) to participate in the Title I Migrant Program.		<input checked="" type="checkbox"/> <input type="checkbox"/>
2. I give my permission for my child(ren) to be given emergency medical referral services.		<input checked="" type="checkbox"/> <input type="checkbox"/>

Unsafe Conditions Example

Section IV: Comments – Unsafe Conditions Remote COE Completion Example

SECTION IV: COMMENTS (Must include <input type="checkbox"/> 2bi, <input type="checkbox"/> 4a, <input type="checkbox"/> 4b, <input type="checkbox"/> 5*, <input type="checkbox"/> 6a, and <input type="checkbox"/> 6b of the Sec III: Qualifying Moves & Work Section, if applicable.)
<i>The following conditions made a face-to-face interview unsafe: recruiter was unfamiliar with the location and felt unsafe recruiting alone. The interviewee, Mario Lopez (child's father), verified all eligibility information via phone and gives permissions as marked in Section V.</i>

Section V: Interviewee Signature – Unsafe Conditions Remote COE Completion Example

SECTION V: 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.		
<u>Safety Concern</u>	<u>Father</u>	<u>04/01/2023</u>
Signature	Relationship to the child(ren)	Date
<i>Check all that apply</i>		Yes / No
1. I give my permission for my child(ren) to participate in the Title I Migrant Program.		<input checked="" type="checkbox"/> <input type="checkbox"/>
2. I give my permission for my child(ren) to be given emergency medical referral services.		<input checked="" type="checkbox"/> <input type="checkbox"/>