

Title I, Part C

District Staff Manual

Education of Migratory Children and Youth
2026-2027



Alaska Department of Education and Early Development

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Program & Policies Overview

The Alaska Title I, Part C Program

The U.S. Department of Education provides formula grants to states to establish or improve education programs for migratory children and youth. In turn, the Alaska Title I-C program provides grants to school districts to improve educational opportunities for migratory children to help them succeed in the regular school program, meet the challenging State academic standards that all children are expected to meet, and graduate from high school.

History

The program is authorized by Title I, Part C of the Elementary and Secondary Education Act of 1965. Congress established the national Title I-C program in 1966 to provide funds to establish or improve educational programs designed to meet the unique needs of migratory children and youth. Congressional support has increased steadily since then.

The State of Alaska became involved with the Title I-C program in 1980 when the federal definition of qualifying migratory activity was expanded to include both logging and fishing. Currently, 39 of Alaska's school districts operate a Title I-C program.

Today, the Title I-C program identifies roughly 250,000 children across the country with approximately 14,500 migratory children in Alaska. With these funds, states and local schools provide a broad range of instructional and support services to supplement regular classroom instruction and to help migratory children overcome barriers arising from lifestyle, mobility, and educational interruption.

Purpose

The purpose of the Title I-C program is to:

- Assist states in supporting high-quality and comprehensive educational programs and services during the school year and, as applicable, during the summer or intersession periods, that address the unique educational needs of migratory children.
- Assure that migratory children who move among the States are not penalized in any manner by disparities among the States in curriculum, graduation requirements, and challenging State academic standards.
- Ensure that migratory children receive full and appropriate opportunities to meet the same challenging State academic standards that all children are expected to meet.
- Help migratory children overcome educational disruption, cultural and language barriers, social isolation, various health-related problems, and other factors that inhibit the ability of such children to succeed in school.
- Help migratory children benefit from State and local systemic reforms.¹

Goal

The primary goal of the Title I-C program is to ensure that all migratory children and youth reach challenging academic standards and graduate with a high school diploma that prepares them for responsible citizenship, further learning, and productive employment.

¹ ESEA §1301.

Legal/Authoritative Reference

The Title I-C Education of Migratory Children Program is authorized by the following legal and authoritative references:

- **Statute** – Elementary and Secondary Education Act (ESEA), Title I, Part C, §1301-1309, as amended by the Every Student Succeeds Act (ESSA)
- Code of Federal Regulations – 34 CFR §§ 200.81-200.89
- **Guidance** – Title I-C Policy Non-Regulatory Guidance

Organization

The Title I-C Education of Migratory Children Program is organized at several different levels of government and operation:

- U.S. Department of Education - Office of Migrant Education (OME)
- Alaska Department of Education & Early Development (DEED)
- School Districts - Local Title I-C Programs

Role of the Federal Title I-C Staff

At the federal level, the [U.S. Department of Education \(ED\) - Office of Migrant Education \(OME\)](https://ed.gov/grants-and-programs/formula-grants/formula-grants-special-populations/migrant-education-program-title-i-part-c-state-grants) (ed.gov/grants-and-programs/formula-grants/formula-grants-special-populations/migrant-education-program-title-i-part-c-state-grants) administers the Title I-C program nationally and provides guidance and support to states that receive grants. The OME has several responsibilities, including providing national leadership, conducting special initiatives, helping U.S. Department of Education (ED) to calculate state Title I-C allocations, monitoring state programs for compliance with federal requirements, collecting and analyzing student performance data, developing regulations and guidance, and providing technical assistance on how to implement the Title I-C program. A federal program officer (i.e., contact person) is assigned to each state to assist and monitor its implementation of the Title I-C program.

Role of the State Title I-C Staff

OME awards Title I-C formula grants to the [Alaska Department of Education & Early Development \(DEED\)](https://education.alaska.gov/ESEA/TitleI-C) (education.alaska.gov/ESEA/TitleI-C). DEED is then responsible for the operation and administration of the state Title I-C program. DEED sub-grants the funds to districts to administer and operate local Title I-C education programs. DEED Title I-C staff are responsible for overseeing all aspects of the administration of the program, including the state's Identification & Recruitment (ID&R) system. The focus of the DEED Title I-C team is to provide overall leadership and direction for the state as a whole, and to ensure that local programs comply with all applicable laws and other requirements. The state is responsible for finding and enrolling migratory children from across the state, for determining their unique needs, and for developing a service delivery plan that uses resources in an equitable and effective manner. The DEED Title I-C team also provides statewide leadership and guidance to recruiters. When a recruiter asks a question that cannot be answered at the local level, the district should raise the question at the state level for a response.

Role of the District Title I-C Staff

At the district level, the emphasis is on finding and serving individual migratory children. The recruiter, perhaps with assistance from other local staff, finds potentially eligible migratory children, determines whether they may be eligible for the Title I-C program, and helps connect them with appropriate services. Once the child is identified and the child's needs are assessed, Title I-C educators and others at the district level may provide extra services that are beyond those offered by the local school. For example, Title I-C

instructional staff may provide in-home tutoring, after school coursework, or summer programs. Migratory children may also be eligible to receive services through other programs serving migratory children.

Local school districts that receive a sub-grant from the State Education Agency (SEA) to serve migratory children are responsible to the state Title I-C program. When a recruiter or anyone else at the local level has a question or needs support, the recruiter should turn to an immediate supervisor for assistance. The supervisor may be an ID&R staff member or a local program coordinator who has broader duties. Local projects are often asked to gather local data for the state for evaluation purposes and to inform state decision makers.

Family Educational Rights and Privacy Act (FERPA)

Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99) is a Federal law that protects the privacy of student education records. The law applies to all schools that receive funds under an applicable program of the U.S. Department of Education.

FERPA gives parents certain rights with respect to their children's education records. These rights transfer to the student when he or she reaches the age of 18 or attends a school beyond the high school level.

Parents or eligible students (eligible students are children who have reached the age of 18 or have otherwise had FERPA rights transferred to them) have the right to inspect and review the student's education records maintained by the school. Schools are not required to provide copies of records unless, for reasons such as great distance, it is impossible for parents or eligible students to review the records. Schools may charge a fee for copies.

Parents or eligible students have the right to request that a school correct a record which they believe to be inaccurate or misleading. If the school decides not to amend the record, the parent or eligible student then has the right to a formal hearing. After the hearing, if the school still decides not to amend the record, the parent or eligible student has the right to place a statement within the record setting forth his or her view about the contested information.

Generally, schools must have written permission from the parent or eligible child to release any information from a student's education record. However, FERPA allows schools to disclose those records, without consent, to the following parties or under the following conditions (34 CFR § 99.31):

- school officials with legitimate educational interest,
- other schools to which a student is transferring,
- specified officials for audit or evaluation purposes,
- appropriate parties in connection with financial aid to a student,
- organizations conducting certain studies for, or on behalf of, the school,
- accrediting organizations,
- to comply with a judicial order or lawfully issued subpoena,
- appropriate officials in cases of health and safety emergencies, and
- state and local authorities, within a juvenile justice system, pursuant to specific State law.

Schools may disclose, without consent, directory information such as a child's name, address, telephone number, date and place of birth, honors and awards, and dates of attendance. However, schools must tell parents and eligible students about directory information and allow parents and eligible students a reasonable amount of time to request that the school not disclose directory information about them. Schools must notify parents and eligible students annually of their rights under FERPA. The actual means of notification (special letter, inclusion in a PTA bulletin, student handbook, or newspaper article) is left to the discretion of each school.

[Student Privacy at the U.S. Department of Education](#)

1-800-USA-LEARN

U.S. Department of Education

400 Maryland Avenue, SW

Washington, D.C. 20202-8520

(studentprivacy.ed.gov)

FERPA Overview

The Family Educational Rights and Privacy Act (FERPA) of 1974 is a Federal law which:

- Protects the privacy of student education records (including the hard copy Certificate of Eligibility (COE), as well as any electronic versions of the COE).
- Applies to all schools and educational agencies that receive funds under an applicable program of the U.S. Department of Education.
- Gives parents certain rights with respect to their children's education records. These rights transfer to students when they turn 18 or attend a school beyond high school.
- Requires that educational agencies and institutions adopt a policy regarding how they meet the requirements of FERPA and how they notify parents and eligible students annually of their rights.

Parent Information

- Parents or eligible students have the right to access and inspect the student's educational records.
- Parents or eligible students have the right to request that education records be corrected if they are found to be inaccurate or misleading.
- Generally, schools and districts must have written permission from the parent or eligible student before releasing any information from a student's education record (including the COE).

Recruiter Information

When closing interviews with families, the following conditions and FERPA rights must be explained to parents/guardians:

- Before the interviewee signs the COE, have them review the COE for accuracy. By signing the COE, they are confirming that this move is an economic need for their family.
- Tell the parent: "The information that you have provided to us is confidential. By signing the COE, you give us permission to enroll your child into the Title I-C program (if they are approved). FERPA gives you the right to access and update your children's records upon request."
- Obtain a signature from the parent/guardian.
- Explain that the COE will be reviewed and after a determination of eligibility is made, the parent will be contacted and will be given a copy of the approved COE.
- Tell the parent: "If approved into the program, your children may be eligible to receive services such as: enrollment in the free lunch program, educational tutoring, and educational books."
- Tell the parent: "You might receive a call from the state Title I-C program (DEED) to verify the information on the COE."
- Thank parents for their time and inform them that somebody will follow up with them once an official eligibility determination has been made.

FERPA Best Practices

Personally Identifiable Information

- Personally Identifiable Information includes but is not limited to: child's name, date/place of birth, parents' names, addresses, student ID, etc.
- Personally Identifiable Information is protected under FERPA. Any notes with personally identifiable information should be shredded once the interview has concluded.
- Personally Identifiable Information may not be disclosed without written consent.

Paper Security

- Be sure to shred any extra copies of the COE or any COEs with mistakes on them. Securely retain the final COE with signatures.
- If recruiters keep notes of interviews, be sure to properly store/destroy them if they contain personally identifiable information (child's name, parents' names, address, student ID, date/place of birth, etc.).

Electronic Security

- Electronic COEs must be completed using official district computers (not personal computers) and copies must be securely deleted (not stored on the computer).
- Laptop computers are required to have encryption to protect child data.
- If transmitting COEs to a parent's personal email account, consider obtaining parent permission (even verbal permission) prior to emailing. The district may consider password protecting the COE before emailing it to parents.
- Always use official district email accounts to send child data (COEs).
- When receiving reports containing personally identifiable information, consider saving the report to a secure location and deleting the email. When sending reports, consider deleting the sent email.
- Consider password protecting documents containing personally identifiable information before saving or sending them.

COE Requests

If another district or state requests a copy of a COE:

- Ask if that child has moved to their district/state and is enrolling in their district/state.
- Ask if the parent signed a written release.
- Check if the current district/state has a written release on file.
- Inform DEED of the child's move and a member of the DEED Title I-C team will coordinate with the receiving district.

The Recruiter

This section outlines the essential responsibilities of recruiters involved in identifying and recruiting migratory children in the Title I, Part C program under the Elementary and Secondary Education Act (ESEA). Recruiters play a critical role in ensuring eligible children and youth receive the services and support they are entitled to, beginning with understanding their general duties and the processes used to locate and recruit migratory families. The following subsections provide guidance on effective identification and recruitment practices, conducting interviews with families, determining potential eligibility, and accurately completing required documentation.

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General Responsibilities of the Recruiter

District recruiters participate in the effort to identify and recruit families of eligible migratory children. Recruiters work closely with district records managers during fall recruitment and throughout the year to collaborate on identification tasks and eligibility reviews. The responsibilities of the district recruiter are:

Attend Training

- Attend annual fall training on identification and recruitment of migratory children.
- Review all training materials to better understand the necessary information needed to make eligibility determinations for the Title I-C program.

Identify and Recruit Migratory Children

- Become familiar with locations where migratory families and youth live and work.
- Be able to explain the Title I-C program to parents/guardians.
- Use district resources to develop a list of potential families of migratory children to interview.
- Interview all current eligible migratory children to verify eligibility and update information.
- Interview families of potential migratory children.
- Follow ethical standards and confidentiality laws.
- Implement state quality control procedures.

Fill out Required Paperwork

Certificate of Eligibility (COE)

- Complete a COE on all families that appear to meet eligibility requirements.
- Keep accurate records of all contacts made.

Obtain Signatures on the COE

- The interviewee must sign the COE first.
- The recruiter signs the COE after the interviewee.
- Submit the completed COE to the district records manager for review and the designated SEA signature.

Certificate of Eligibility Recertification (COE Recert)

- When applicable, complete a COE Recert form for children that did not make a new move but still have eligibility with the program.
- Keep accurate records of all contacts made.
- Submit the completed COE Recert to the district records manager for review.

Follow-Up with Families

- The COE is reviewed by the DEED Title I-C staff and eligibility status is determined; however, if DEED has additional questions before an eligibility determination can be made, the records manager is notified. The records manager in turn contacts the recruiter for more information. The recruiter should stay in contact with the family and may be required to contact the family for additional information.
- Recruiters stay in contact with the records manager until all potential families of migratory children have been contacted, interviewed, and all eligibility decisions have been made.

Identification & Recruitment (ID&R) of Migratory Children

Importance of ID&R

Identification means actively looking for and finding migratory children and youth. Recruitment means contacting the family or youth and obtaining the necessary information to document the child's eligibility and enroll them into the Title I-C program.

The ID&R of migratory children is essential because the district must create a record of eligibility for each migratory child before he or she can receive any of the Title I-C program's educational or supportive services. The longer it takes a district to find a migratory child, the more time passes before the child receives the extra services he or she may need to succeed. Furthermore, the children who are most in need of Title I-C program services are often the most difficult to find. Migratory children who are not identified may experience problems such as delays in placement or incorrect school assignment; failure to count partial credits or inappropriate course sequence for graduation from the student's home-based school; and obstacles to receiving necessary supplemental services. Even if an individual migratory child does not receive direct services, it is important to identify all migratory children so their needs can be assessed and monitored to plan future services if a need does arise.

Timely and effective identification & recruitment (ID&R) is a challenge for the Title I-C program for the following reasons:

- The eligibility requirements for the Title I-C program require strong analytical skills to evaluate eligibility properly. Not all temporary or seasonal workers are eligible for the Title I-C program because the worker must have moved due to economic necessity and must have met all the program requirements.
- Migratory families are inclined to be self-sufficient and are not accustomed to seeking help outside of their own circle of family and friends.
- The Title I-C program may not be able to serve all migratory children, the children may not currently need supplemental academic help, or they may not be deemed a priority for service. Therefore, some families may not see an immediate benefit to their child being identified and may forgo the process.

To find and enroll eligible migratory children into the Title I-C program, the district Title I-C program relies on trained staff called recruiters. Recruiters are the individuals who contact migratory families, explain the Title I-C program to them, and collect the necessary information to determine whether a child is eligible for the Title I-C program.

Forms Used for ID&R

Being ready with the correct tools and resources to effectively and efficiently screen, interview, and document eligibility will make the ID&R process easier for the recruiter and allow the children to receive promptly the necessary instructional and support services needed for optimal individual personal and academic success. ID&R is a cyclical progression that involves quality control measures, a system of maintaining a high standard for processes and procedures, to ensure that only true migratory children are being located and identified. The forms in this section will be utilized for identifying and recruiting migratory children and youth into the Title I-C program.

Certificate of Eligibility (COE)

This is the official legal document that contains the child's eligibility. The form is completed by the recruiter after interviewing the parent/guardian, the worker, the spouse, or someone who has knowledge of the worker's and the child's moves and family demographic data. If the child and the worker do not make other

qualifying moves, the form is valid for three years from the child's qualifying arrival date. Detailed instructions on [Certificate of Eligibility \(COE\) Form](#) can be found starting on page 39.

Certificate of Eligibility Recertification (COE Recert)

This form is used when eligible migratory children have not made any additional qualifying moves since their last certification, but they are still currently eligible for the Title I-C program. A Certificate of Eligibility Recertification (COE Recert) recertifies a child's eligibility in the recruiter's district. Detailed instructions on [completing a COE Recert](#) can be found starting on page 71. Note: This form was previously called an Annual Recertification of No New Moves (ARC).

Characteristics of a Successful Recruiter

Generally, it takes about three years for a recruiter to fully learn the job. The specific skills required to be a great recruiter are developed over time. If the recruiter does not initially possess these skills, the records manager can help the recruiter cultivate them.

When ID&R coordinators and Title I-C program administrators are asked about "a great recruiter" or "their best recruiter," certain characteristics emerge. A great recruiter can:

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

Few recruiters come to the job with all the skills that make a great recruiter. Effort, enthusiasm, and a willingness to learn are necessary. Although it may take several years to be considered great, it is within the grasp of every recruiter to achieve excellence.

Lessons Learned

Each recruiter has stories about things that went wrong or that could have been done differently in carrying out his or her roles and responsibilities. These lessons learned may help the new recruiter avoid pitfalls that experienced recruiters have faced.

Know About the Local Title I-C Program

The recruiter must know more than just recruitment. The recruiter is often the face of the Title I-C program to families, out of school youth, schools, and the local community. A migratory family will often ask the recruiter questions about Title I-C program services that the school and other programs offer such as: does the Title I-C program offer a pre-school program, is there a summer school, are dropouts eligible for the Title I-C program, and what programs are available to help my son/daughter graduate? The recruiter should learn about the Title I-C program and other school and community programs that migratory children and families are eligible for.

Develop a Recruitment Network

A recruitment network is a system of contacts including individuals, agencies, and other institutions that provide information on how to identify and locate potentially eligible children. Establishing a recruitment network and developing a strong working relationship with each member of that network is an important way of finding migratory children who may be eligible for Title I-C program services. Key sources of information include employers, schools, community-based agencies, commercial establishments, and others.

Determine Work Priorities

Recruiters often have many roles. If a recruiter is expected to recruit and do other work duties, the recruiter should determine the work the supervisor considers the highest priority and allocate time accordingly.

Give the Title I-C Program its Due

If a recruiter is paid by more than one funding source, the recruiter should ask an immediate supervisor how much of his or her time is paid from Title I-C program funds and how many hours per week should be spent on ID&R activities. The recruiter should then devote that amount of time to Title I-C program work. Similarly, a recruiter who works full-time for the Title I-C program should guard his or her time to make sure all work activities benefit the Title I-C program.

Ask Questions

There are many people who work in the Title I-C program who are willing to help the recruiter do the job correctly. If the recruiter has a question or does not understand how something should be done, the recruiter should ask someone who is knowledgeable and write down the answer. In this way, the recruiter will become increasingly knowledgeable over time.

Make Ethical Decisions

The recruiter will meet families and youth who have great needs. The recruiter may believe that those children need and deserve help, even if they do not qualify for the Title I-C program. On the other hand, the recruiter may meet families whose children clearly qualify for the Title I-C program but may not find them as deserving. Because of these feelings, the recruiter may experience internal conflict about making accurate eligibility decisions. Each recruiter brings a set of personal beliefs and biases to the job; the recruiter will need to put these personal feelings aside to make objective decisions based on the Title I-C program eligibility criteria.

Be Aware of Federal, State, and Local Requirements

States and districts may have their own requirements for the recruiter that go beyond the federal requirements. State and district-specific requirements may include responsibility for knowing and understanding privacy laws and reporting suspected cases of child abuse or child abduction. Recruiters also need to become familiar with the Family Educational Rights and Privacy Act (FERPA) – the Federal law that protects the privacy of student education records from unauthorized release. While these areas should be part of every recruiter's training, if the recruiter is not aware of FERPA or the applicable state privacy, child abuse, or other relevant laws, the recruiter should ask a supervisor.

Remember that a Recruiter is Not Alone

Being a recruiter can sometimes seem like a lonely job. However, ID&R is a team effort. It is important for the recruiter to understand that identifying, recruiting, and determining initial eligibility of migratory children is the mutual responsibility of the recruiter and the ID&R team. When the recruiter has questions or needs help, there are other people who work in the Title I-C program at the local and state levels who can assist.

Interviewing Families of Migratory Children

The Recruiter as the Interviewer

Recruiting requires a great deal of knowledge, skill, and sensitivity. In particular, the recruiter needs to thoroughly understand the Title I-C program child eligibility requirements and be able to ask probing, yet, not leading, questions to make informed decisions about whether a child or youth may qualify to receive Title I-C program services. Furthermore, the recruiter needs to solicit this information without offending the migratory family or youth. This section addresses how the recruiter prepares to interview families of migratory children and youth, as well as how the recruiter should conduct the interview.

The recruiter must strike a balance between having a relaxed conversation and gathering the very specific information needed to determine child eligibility. Conducting a thorough interview and accurately documenting the information collected is key to determining a child's eligibility for the Title I-C program. This section will walk the recruiter through the process immediately before visiting prospective families or youth all the way through what to do after completing the interview. It is important to note that recruiters cannot act as an interviewer for their own family. Another member of the Title I-C program staff must interview such families.

Recommended Interviewing and Recruitment Order

While districts have the freedom to choose their own recruitment order, DEED recommends the following order to ensure that eligible children receive as much uninterrupted services time as possible:

1. Interview families with children who have ended their eligibility since last school year.
2. Interview families with children whose eligibility will soon end.
3. Interview families with children who are currently eligible.
4. Interview new families
 - a. with children who are new to the district but have Title I-C eligibility from another district
 - b. with children new to the Title I-C program

Preparing for an Interview

Supplemental Interview Forms

To determine whether a child or youth is eligible for the Title I-C program, the recruiter needs to interview the migratory worker or another responsible adult to obtain information regarding eligibility. Supplemental interview forms may be used to guide the recruiter through a series of questions to create a structured, yet comfortable, conversation to draw out the information needed to make a preliminary eligibility determination. It is the recruiter, not the migratory worker, with the help of other Title I-C program staff, who makes the preliminary eligibility determination of whether a child qualifies for the Title I-C program. In Alaska, the DEED Title I-C team makes the final eligibility decision.

While a supplemental interview form is a useful tool in determining child eligibility, it is not all-inclusive. There are situations where the recruiter may need to ask additional questions to address an interview situation. However, supplemental forms provide two purposes: a starting point for new recruiters to understand the basic questions to determine child eligibility, and a supporting record of the underlying information the national COE is designed to collect.

The [Interview Framework](#) on page 151 is formatted to guide the new recruiter through an eligibility interview.

Ask Screening Questions

After the new recruiter has conducted several interviews and has gained experience with the structure and questions, he or she might want to select a few questions that can be used to screen families and youth. This practice helps by quickly screening whether anyone in the household meets the primary eligibility criteria, thereby warranting a full interview. Although the most reliable way to determine which children or youth are eligible for the program is to conduct a full interview with every prospect, because of time constraints, the recruiter may decide to focus on those children and youth who are most likely to be eligible.

If the recruiter uses screening questions, he or she should not make a preliminary eligibility determination without asking all the eligibility questions. The type of friendly conversation that often occurs during an initial screening will not give the recruiter enough information on each of the basic child eligibility factors to make a reliable child eligibility determination. During the full interview, the recruiter will need to ask enough follow-up questions to gather all the necessary information. Asking screening questions may help the recruiter use time wisely by only conducting interviews when it is likely that a child or youth will be eligible for the Title I-C program. However, screening questions cannot replace a full interview.

Interviewing Families

Before the Visit

The following list provides general steps the recruiter may wish to follow prior to visiting a family:

- Pre-screen families or youth prior to the visit, if possible.
- Develop a schedule of whom to visit each day.
- Determine whether an interpreter is needed and, if so, make suitable arrangements.
- Bring a copy of the family's previous Certificate of Eligibility (COE), if available.
- Dress neatly, but not too formally, so that the family feels comfortable.
- Give a colleague a copy of the day's schedule, complete with locations, approximate times, and when the recruiter expects to return to the office or home. Notify the office or a co-worker if plans change.
- Print a copy of the Sample Interview Script and the child eligibility factors.
- Bring any materials the recruiter will need to complete the COE.
- Take time to get organized before conducting each interview.

During the Interview

Introduction

The recruiter should begin by introducing himself or herself and explaining what the Title I-C program is and the reason for the visit. It is not necessary to go into detail about Title I-C program services, but the recruiter should provide enough information to put the interviewee at ease so the recruiter can gather accurate information. A parent or youth may feel less apprehensive and may be more forthcoming if he or she understands the reason for the interview. The recruiter may also want to point out that he or she is not selling anything; the Title I-C program is free for eligible children and the information they provide is confidential.

Common Ground

The recruiter will need to think about how to build a rapport with families of migratory children. Making friendly conversations may make parents feel more comfortable.

Conversational Tone

This will help put the interviewee at ease and will make the recruiter more likely to obtain accurate information. Administrators often try to hire recruiters who are friendly, non-threatening, and if possible, from similar cultural backgrounds so families and youth feel comfortable talking with them. Being too “business-like” or asking probing questions too quickly can make a family or youth feel uneasy and unwilling to share information. An understanding of possible cross-cultural differences will help to set the proper tone of the interview.

Note Taking

The recruiter should always take notes during the interview rather than relying on memory. These notes, which can be filed with the completed COE or on a supplemental interview form, become important when an eligibility determination is questioned or when a third-party requests additional information on how the decision was made (e.g., as in the case of a quality control re-interview, or in an appeal by a parent).

Active Listening

The recruiter can only get the information that is needed when the interviewee is talking. Therefore, the recruiter should be sure not to dominate the conversation. The recruiter should use active listening skills, including techniques like the following:

- Focus on the speaker.
- Sit near the speaker.
- Lean forward in an engaged pose.
- Restate the speaker’s key points.
- Summarize the conversation.
- Ask relevant questions.
- Show interest through facial expressions and gestures like nodding.
- Let the speaker rest after talking.

Repeat/Reword Questions

The recruiter should feel comfortable asking a question a second time or approaching it from a different angle. Rewording a question may help the interviewee understand what information the recruiter is seeking.

Change the Order of Questions Asked

Another adaptation or modification that a recruiter might consider is changing the order of the questions to start with the questions that would be most likely to disqualify a particular child or youth first. For example, if the recruiter is interviewing a mother who has three young children with her, the recruiter might find it more productive to begin the interview by asking whether the family has moved within the last 36 months rather than by asking the ages of the children. If the family has not moved, there is no reason to proceed further with the interview. Also, the recruiter may want to change the phrasing of questions to use language that local families might be more familiar with or may want to translate the questions into the family’s native language. Although recruiters have the flexibility to modify the order of questions, recruiters must examine the basic eligibility factors to determine whether a child is eligible for the Title I-C program.

Answer Questions / Follow-Up

If the family or youth asks a question that the recruiter cannot answer, the recruiter should not be afraid to say, “I do not know the answer to that, but I’ll be glad to find out for you.” It is much better for the recruiter to admit not knowing something than to give the wrong answer. Writing down any questions or concerns the family or youth might have and following up with them later will help build the recruiter’s credibility within the district’s migratory community.

Additional Information or Documentation

There are scenarios in which the recruiter is advised to ask more questions or to get additional documentation.

Scenario	Guidance
The facts are unclear.	An interviewee may give conflicting or unclear answers because of fear or stress, an inability to recall specific information, language issues, or other unintentional reasons. Another example is where language issues prevent the recruiter from getting clear responses to eligibility questions (e.g., the person being interviewed speaks a language that is not typically spoken in that area, and the district is unable to find a good translator). The child should not be enrolled until the Title I-C program has enough information to determine if he or she is eligible.
The recruiter suspects that the family has not been truthful.	In some cases, families may say whatever they need to say to try to get their child(ren) eligible for the program to get desired Title I-C program service(s) (e.g., extra tutoring). The recruiter should be aware of these motivations and clarify any information that does not appear to be accurate.
If there is a question regarding economic necessity.	If a move was of an extremely short duration of time, it may be questionable whether the family moved due to economic necessity. The Title I-C program considers economic necessity to mean the worker moved either because he or she could not afford to stay in the current location or went to a new location to earn a living.
It is not clear that the employment the worker is engaged in or actively sought is qualifying work.	If the worker moved to find work that the state has not qualified previously, it may not be clear whether the work meets the definition of being agricultural/fishing or of being temporary/seasonal employment. In this case, the recruiter will need to collect enough information to allow the state to determine if the work qualifies for the purposes of the Title I-C program.
The worker did not engage in qualifying work soon after the move, information (1) on the ways in which the worker actively sought such employment and (2) the recent history of the worker's moves for qualifying work is not evident.	For workers who did not engage in qualifying work soon after the move, the recruiter needs information on both (1) and (2). The recruiter should ask the worker about where he or she applied for work and how many potential employers he or she contacted within 60 days after the move.
The family made a short duration move.	For workers who did not engage in qualifying work soon after the move, the recruiter needs information on both (1) and (2). The recruiter should ask the worker about where he or she applied for work and how many potential employers he or she contacted within 60 days after the move.

Confirm Information and Form Signing

The recruiter should review the COE with the person who was interviewed to make sure that everything recorded on the form is accurate. The interviewee may make corrections or remember additional details; the recruiter should take the time to get it right. The recruiter should summarize the information gathered from the interview and repeat it back to allow the interviewee to make corrections if necessary. Once any needed corrections have been made to the COE, the recruiter can then ask the interviewee to sign the form to verify that he or she provided the information and that it is true to the best of his or her knowledge.

The recruiter must inform the family that by signing the COE they are willing to be contacted by the district, DEED or the US Department of Education for a re-interview. An interviewee signature on a COE certifies that a parent is willing to talk to a representative from the Title I-C program for a potential re-interview. The re-interview is a quality control measure that DEED conducts to confirm how eligibility is being determined and to identify and fix problems in the ID&R process.

Information necessary to determine a child's eligibility for the Title I-C program, and to document such eligibility on the COE, is based on an interview with the child's parent/guardian or spouse, the child (if the child is the migratory worker), or another individual who is not the child's parent/guardian or spouse (e.g., an older sibling or other household member), but who has direct knowledge of the information needed by the recruiter to determine eligibility. While it is preferable to obtain information regarding qualifying work directly from the worker, the workers' statements may be relayed by the interviewee if the worker is not available at the time of the interview.²

It is important to remember that the recruiter cannot interview members of their immediate family for the Title I-C program or sign the COE for members of their immediate family as the interviewer. Another Title I-C program staff member will need to complete the interview form and sign as the interviewer for members of the recruiter's immediate family.

After the Visit

After the recruiter has completed the interview portion of the visit, he or she should do the following:

- Check the COE to make sure it is complete, clear, signed, and correct.
- If needed, consult with the translator to verify the information on the COE and observations regarding the interview.
- Make a note of any observations about the family or youth that may assist in making the final eligibility determination.
- Follow up on any promises made to the family during the interview.
- Avoid sharing private information about the family that came out of the visit. Respecting confidences is a way of gaining the respect and trust of the family. Much of this information is also protected by privacy laws.

² Non-Regulatory Guidance, Chapter II.

Difficulties While Interviewing

The recruiter may encounter any number of difficulties during an interview. While it is impossible to anticipate every possible issue a recruiter might encounter, some of the most common difficulties are discussed below.

Resistance

A migratory family or youth may refuse to be interviewed or may not want to disclose information about their employment, particularly if the family or youth is not familiar with the program. It is important that the recruiter assures the interviewee that the COE will only be used to document the child's eligibility for the Title I-C program. By explaining the Title I-C program's basic purpose, the recruiter may be able to persuade the family to allow the recruiter to interview them. Another strategy is to give the family time to think about the request and come back later.

To overcome resistance, it might be helpful for the recruiter to make the following points:

- The State is required to look for all children who are eligible for Title I-C program services.
- The Title I-C program is a supplemental educational program that helps migratory children who are struggling to keep up in school due to factors such as lack of educational continuity, lost instructional time, difficulty adjusting to a new school, lack of educational support in the home, health issues, and access to services.
- Even if a child does not need help at this time, the family should know about the Title I-C program for future reference.

Leading Questions

Because the interview is critical to determining the child or youth's eligibility for the Title I-C program, the recruiter should avoid asking questions that lead families to give vague or untruthful answers. Leading questions can often be answered by "yes" or "no" responses and prompt the interviewee to give a particular answer. On the other hand, open-ended questions prompt the interviewee to provide more information than simply "yes" or "no."

<u>DO</u> Ask Open-Ended Questions	<u>DO NOT</u> Ask Leading Questions
Why did you move here?	You moved here to work in fishing, right?
What kind of work were you looking for?	Did you move to engage in any type of fishing work?
How did you know this type of work was available?	
Has anyone in your family moved recently?	You have moved recently, have you not? Say, within the past three years?
When did they move?	
How long has your family been living in [name of current hometown]?	You know we have a great summer program for children who have moved. I will bet your kids have moved in the last few years, have they not?
Did you ever travel anywhere else?	

Chronological Confusion

Experienced recruiters often report that it is easier to get a worker to tell what was done than when it was done. For example, a worker may recall having driftnet for salmon but may have trouble remembering the exact start date. Many people have trouble remembering specific dates; this can be even more difficult for families of migratory children who move frequently. It is critical that the recruiter gets the most accurate date possible since the child or youth must have moved within the preceding 36 months to be eligible for the Title I-C program.

To help the worker place the event on time, the recruiter may wish to:

- Review a calendar with the worker and ask the worker to point to the date of the move.
- Help the worker recall important news, school, or family events and try to determine if the move happened before or after that event.
- Ask the worker to recall the ages or grade levels of the children at the time of the move.
- Check with other family members.

Contradictions

During an interview, a family may give answers that appear to be contradictory or inconsistent with what the recruiter has observed. If a situation is unclear or if the recruiter is not satisfied with the answers that the interviewee provided, the recruiter should tell the interviewee that he or she must consult with a supervisor and that he or she will inform the family of the supervisor's decision. A family or interviewee may feel pressure to give false or exaggerated information for a variety of reasons: to qualify for services, to please a friendly recruiter, to appease another family member, or to compensate for not knowing or remembering the answers to certain questions. The recruiter should be aware of these motivations and clarify any information that does not appear to be accurate.

Premature Determinations

The recruiter should avoid telling the interviewee whether the child or youth is eligible for the Title I-C program during the initial visit. There may be circumstances or issues that the recruiter did not consider during the interview that may later affect the eligibility determination. The recruiter should inform the family that others need to review the COE before a final eligibility determination is made, and that someone from the Title I-C program will notify the family of the outcome.

Similarly, the recruiter should avoid telling the interviewee that the child or youth will receive Title I-C program services. The Title I-C program is not required to serve every eligible migratory child. In some areas, an eligible child may not be served because there are other eligible children who have greater needs. Funds are limited and local programs are often forced to make tough decisions. Families often ask what kind of services their children will receive, and the recruiter may be tempted to list all the services the local program provides. However, the recruiter should keep in mind that not all eligible children will receive all the services. Therefore, while most programs assess migratory children and do their best to deliver the most appropriate services, there is no guarantee that every child will be served or receive every service the district offers.

Assumptions and Judgements

The recruiter is susceptible to making assumptions and judgments about people they encounter that may make interviewing difficult.

Assumption	Fact
Every child in a family qualifies for the Title I-C program .	There are times when one or more children in a family may not be eligible for the program For example, a child may have been born after the family made the qualifying move or an older child may already have graduated.
If the children did not move with the worker, they do not qualify for the Title I-C program.	In some cases, a worker may move alone, leaving the children with a spouse or grandparent. In these cases, the children are not eligible for the Title I-C program because they did not move. However, it is possible that some or all the children made a subsequent qualifying move with the worker.
All workers at a particular job site (fish camp) qualify.	Some sites have both permanent and temporary/seasonal jobs. The recruiter should make sure that the job the worker sought is temporary/seasonal.
All migratory families or workers are Alaska Native.	Migratory workers have been identified in many different ethnic groups.
If the worker's most recent qualifying move was not to find qualifying work, their children do not qualify.	If a child makes a qualifying move with or to join a parent/guardian who is a migratory worker, regardless of whether this particular move was to find qualifying work, the child could still be eligible for the Title I-C program if the child's move was within the 36 months preceding the date of the interview, and the parent still retains his/her status as a migratory worker.
Children who have qualified in another district or state are already Title I-C eligible and do not need to be interviewed.	A recruiter should not rely on a COE made by another district or state. Even though a child may already be on an eligible COE, districts are responsible for making their own eligibility determinations. The recruiter should still interview the family and use that as the basis for preliminary eligibility determination. A COE should be completed for the recruiter's district if applicable.

Migratory Child Eligibility Requirements

The term migratory child means a child or youth who is entitled to free public education or is not yet at grade level at which free public education is offered, made a **qualifying move** due to economic necessity across school district boundaries (or 20 or more miles to a temporary residence in a school district of more than 15,000 square miles) in the preceding 36 months:

- A. as a migratory agricultural worker or a migratory fisher; or
- B. with, or to join, a parent/guardian or spouse who is a **migratory agricultural worker** or a **migratory fisher**.

Start of Eligibility

A child may be identified as a migratory child when the child and the migratory agricultural worker or migratory fisher (if the child is not the worker) complete the qualifying moves due to economic necessity. This is often referred to as the qualifying arrival date, or QAD, for purposes of the COE. However, a child is only eligible to be counted and served as an eligible migratory child after DEED has determined that:

1. the child meets all Title I-C eligibility criteria (see definition of “migratory child”), including that the worker (if the child is not the worker) meets the definition of a “migratory agricultural worker” or “migratory fisher,” **and**
2. all information has been properly recorded on a COE.³

Length of Eligibility

Once DEED has approved their COE, a child is eligible to receive services for up to three years (36 months) from their most recent qualifying arrival date (QAD). **Eligibility does not start until their COE has been approved by DEED. Annual verification and recertification of eligibility in the Title I-C program is a requirement of the State of Alaska.** If the child continues to qualify for the program and does not graduate, services may be provided to this child from birth up to age 20. If a child has an active IEP on file, they are eligible for services until the age of 22.

The Four Migratory Child Eligibility Requirements



A child is eligible for the Alaska Title I-C program if all the following conditions are met:

1. The **child**, is eligible for free public education⁴, and
2. made a **qualifying move(s)** due to economic necessity across school district boundaries⁵
3. **as, with or to join** a parent/guardian or spouse
4. who is a migratory agricultural worker or migratory fisher.

³ Non-Regulatory Guidance, Chapter II, #E1.

⁴ To be eligible for Title I-C recruitment, a child must be eligible for a free public education. In Alaska, this means that the child must be younger than 20 and must not have a high school diploma. A child who has a Certificate of Achievement or GED, but not a high school diploma, is eligible for a free public education. A child who is eligible for special education (active IEP on file) is entitled to a free public education until the age of 22.

⁵ In all school districts that have an areas less than 15,000 square miles, qualifying moves must cross school district boundaries. In school districts that have an area greater than 15,000 square miles, qualifying moves must cross school district boundaries or be a distance of 20 miles or more, one way, to a temporary residence.

Eligibility Requirement 1: Child



The **child** is:

- (a) [under the age of 20 \(22 with an active IEP\)](#), and
- (b) must include either (i) or (ii)
 - (i) [entitled to a free public education \(through grade 12\) under state law](#), or
 - (ii) [not yet at a grade level for which the district provides a free public education](#)

The child is under 20 years of age, and

To be eligible for the Title I-C program the child **needs to be under 20 years of age**, or under 22 years of age with an active Individualized Education Program (IEP) on file.

There is **no minimum age requirement** for the Title I-C program. Children from birth up to age 20 (22 with an active IEP) are potentially eligible for the program.⁶

The child is under 20 years of age exception

A child who is eligible for special education (active IEP) is entitled to a free public education until the age of 22. An active IEP is a written document required for each child who is eligible to receive special education services. Determining if a student has an active IEP on file is the responsibility of the records manager.

The child has not graduated from high school or is too young to be enrolled in school

The child is entitled to a free public education (through grade 12) under state law, or

The child has not graduated from high school. In the State of Alaska, a child is not considered to have graduated from high school if they have received a Certificate of Achievement or GED, but not a high school diploma.

For the purposes of the Title I-C program, out of school youth means children up to age 20 who are entitled to a free public education in the State and who meet the definition of a migratory child, but who are not currently enrolled in a K-12 institution. This term could include children who have dropped out of school or youth who are working on a high school equivalency diploma (GED) outside of a K-12 institution.

The child is not yet at a grade level for which the district provides a free public education

The child is too young to be enrolled in school. Children can be eligible for the program from birth, so long as they meet all eligibility criteria.

⁶ AS §14.03.070, AS §14.03.080, and 4 AAC 52.090
2026-2027 Title I-C District Staff Manual

Eligibility Requirement 2: Qualifying Move



The **child** made a **qualifying move** within the previous 36 months:

- (a) [due to economic necessity](#), and
- (b) [from one residence to another residence](#), and
- (c) [from one school district to another school district](#), except
 - (i) [in districts greater than 15,000 square miles](#) a qualifying move must cross district boundaries or be at least 20 miles, one way, to a temporary residence, and
- (d) [the length of the qualifying move](#) must be at least 1 night/2 days with a total of 7 nights/8 days within a one-year period.

Moved due to an economic necessity, and

The child and the worker (if the child is not the worker) moved because they could not afford to stay in their current location. The Title I-C program considers economic necessity to mean the worker moved either because he or she could not afford to stay in the current location or went to a new location to earn a living.

To establish Title I-C program eligibility, **all qualifying moves must occur due to an economic necessity**. The Title I-C program is premised on the Federal government’s understanding that migratory children have unique needs because of their mobility and generally are in low-income families. Economic necessity is integral to a move that makes a child a “migratory” child.⁷

A person who leaves from the place where he or she lives to, for example, visit family or friends, attend a wedding or another event, take a vacation, have an educational or recreational experience, or take care of a legal matter would not have “changed residence due to economic necessity” because the person did not go the new place because of financial need. Similarly, this person would not have “changed residence due to economic necessity” upon returning home from one of these visits. By itself, moving because of split custody is also not considered moving for economic necessity.

There is no income test for eligibility under Title I-C regulations, and the recruiter may not ask the amount of income derived from employment. Neither the worker, nor his/her family, is expected to maintain, nor is the state expected to review written documentation on income or work history as a condition of determining the eligibility of children for the Title I-C program.

Parents and/or migratory agricultural workers and migratory fishers certify the truth of economic necessity by signing the COE as the interviewee. Similarly, recruiters attest that they verified the moves documented on the COE were due to economic necessity by signing the COE as the interviewer.

Refer to page 157 for the [Guide to Economic Necessity and Personal Subsistence](#).

Changed residences, and

A **residence** is a place where one lives and not just visits. In certain circumstances, boats, vehicles, tents, trailers, etc. may serve as a residence.⁸

⁷ Non-Regulatory Guidance, Chapter II, #D3.

⁸ Non-Regulatory Guidance, Chapter II, #D2.

Crossed school district boundaries, and

In all school districts which have an area less than 15,000 square miles, qualifying moves **must cross school district boundaries**.

School districts with an area less than 15,000 square miles:

Anchorage	Hoonah	Pelican
Annette Island	Hydaburg	Petersburg
Bristol	Juneau	Pribilof
Cordova	Kake	Saint Mary's
Craig	Kashunamiut	Sitka
Delta-Greely	Ketchikan	Skagway
Denali	Klawock	Unalaska
Dillingham	Kuspuk	Valdez
Fairbanks	Mt. Edgecumbe	Wrangell
Galena	Nenana	Yupit
Haines	Nome	

Crossed School District Boundaries Exception

In districts greater than 15,000 square miles, a qualifying move must cross district boundaries or be at least 20 miles, one way, to a **TEMPORARY RESIDENCE**.

- Under ESSA, this exception has been expanded. The 20+ mile rule applies to all qualifying moves made within a district greater than 15,000 square miles, instead of those qualifying moves for fishing work only. This only applies to moves to a temporary residence within the district. **Moves made to a permanent residence within the district are not considered qualifying moves.**

Further documentation for qualifying moves in districts with more than 15,000 square miles must be done during the interview process. **A map is required to document moves of 20 miles or more to a temporary residence.** The map must have a legend/scale for determining distance and must be attached to the original COE and be kept on file at the district office. For moves where distance of 20 miles is unclear, the map must show the start point, the end point, and the route taken.

Districts must adopt necessary procedures to ensure the validity of the qualifying move. On the COE, the specific geographic location of the most recent qualifying move must be listed to determine eligibility.

School districts with an area greater than 15,000 square miles:

Alaska Gateway	Iditarod	North Slope
Aleutian Region	Kenai	Northwest Arctic
Aleutians East	Kodiak	Southeast Island
Bering Strait	Lake & Peninsula	Southwest Region
Chatham	Lower Kuskokwim	Yakutat
Chugach	Lower Yukon	Yukon Flats
Copper River	Mat-Su	Yukon-Koyukuk

Moved for at least 7 nights/8 days within a one-year period

The length of the qualifying move(s) must be **at least one night/two days, with a total of at least seven nights/eight days within a one-year period**. Same day moves do not qualify. Qualifying migratory moves always include overnight stays. Any activity that involves only day trips does not qualify for the Title I-C program.

A migratory worker and a migratory child must stay in a new place long enough to show that the worker and child “moved,” i.e., changed residence due to economic necessity.⁹ Recruiters should carefully examine and evaluate relevant factors, such as whether the move to work was a one-time act or a series of short moves to work to augment the family’s income. Recruiters must verify that the migratory worker and the migratory child are indeed spending the night and changing residences, since merely returning past midnight or early in the morning is not considered a qualifying move of one night/two days. Families must stay in a place long enough to change residences. Recruiters should explain in the **COMMENTS** section of the COE why they believe that a move of very short duration would be considered a qualifying move.

The total qualifying moves of at least seven nights/eight days do not have to occur on consecutive nights. For example, a migratory worker and a migratory child can go commercial fishing across school district boundaries for three nights/four days, and then do the same move for four nights/five days after a month. In this situation, both the worker and the child would have met the minimum length of seven nights/eight days within a one-year period.

Other Important Move Factors

Both the child and the worker must make qualifying move(s) for the child to be eligible for the Title I-C program.

With respect to moves of short duration (less than a week), an independent reviewer might question whether the move was due to an economic necessity. It is important to have sufficient documentation that such moves meet the definition of qualifying moves.

The Title I-C program was established to benefit families who perform qualifying work in the United States. Therefore, moves to another country are not considered to be qualifying moves. However, if an individual’s move to another country is a “change of residence,” the individual’s move back to a school district in the U.S. might be a qualifying move.¹⁰

⁹ Non-Regulatory Guidance, Chapter II, #D5.

¹⁰ Non-Regulatory Guidance, Chapter II, #D15.

Eligibility Requirement 3: As, With, or To Join



The **child** made a **qualifying move** within the previous 36 months:

- (a) **as** the [migratory agricultural worker](#) or [migratory fisher](#), or
- (b) **with** a [parent/guardian](#) or [spouse](#), or
- (c) **to join** a [parent/guardian](#) or [spouse](#)

Moved **as** the migratory agricultural worker or migratory fisher, or

The migratory child is at least fourteen years of age and is the migratory agricultural worker or migratory fisher.

The child must be at least fourteen years old prior to moving as the worker. This includes additional qualifying moves.

The Title I-C program recommends that a comment verifying that the income made and/or catch from the qualifying activity directly supports the child's household be included in the **COMMENTS** section of the COE. It should be clear that the family could not afford to live in their current location if the child did not make the move.

If the child is not the migratory agricultural worker or migratory fisher, the child must move with, or to join a parent/guardian or spouse who is a migratory agricultural worker or migratory fisher.¹¹

Moved **with** a parent/guardian or spouse, or

The child and the migratory agricultural worker or migratory fisher make the qualifying move at the same time.

Moved **to join** a parent/guardian or spouse

The **child made the qualifying move independently** from the migratory agricultural worker or migratory fisher. The child's **qualifying move may either precede or follow** the migratory agricultural worker's or migratory fisher's qualifying move.¹²

For example, the child may move before the migratory agricultural worker or migratory fisher to start the school year on time, or the migratory agricultural worker or migratory fisher may move before the child to set up fish camp. In either case, the fact that the child and his or her parent/guardian or spouse do not move at the same time does not nullify the child's eligibility for the Title I-C program.¹³ However, all qualifying moves must be made due to economic necessity and meet all other qualifying move requirements.

An explanation is required in the **COMMENTS** section of the COE if the child preceded the migratory agricultural worker or migratory fisher or joined the migratory agricultural worker or migratory fisher at a later date.¹⁴

¹¹ Non-Regulatory Guidance, Chapter II, #E2.

¹² Non-Regulatory Guidance, Chapter II, #E2.

¹³ Non-Regulatory Guidance, Chapter II, #E2.

¹⁴ Non-Regulatory Guidance, Chapter II, #E2.

The U.S. Department of Education – Office of Migrant Education believes that as a best practice, the child’s move and the worker’s move should occur within one year of each other. After one year, it is difficult to link the child’s move to the worker’s move. Nonetheless, if there are unusual circumstances preventing the move from occurring within 12 months of each other, these can be documented in the **COMMENTS** section of the COE.¹⁵

Parent/Guardian

The **legal guardian or other person standing *in loco parentis*** (such as a grandparent, stepparent, aunt or uncle, older sibling with whom the child lives, or a person who is legally responsible for the welfare of the child).

A guardian is any person who stands in the place of the child’s parent (“*in loco parentis*”), whether by voluntarily accepting responsibility for the child’s welfare or by a court order.¹⁶ A legal document establishing the guardianship is **not** necessary.¹⁷ A sibling may act as a guardian for the child. However, siblings must be at least 14 years of age at the time of the move(s) to do so.

Spouse

The husband or wife of the **migratory child**.

Qualifying Arrival Date (QAD) Depends on Move Type

The Qualifying Arrival Date (QAD) is the day the child and the migratory agricultural worker or migratory fisher (if the child is not the worker) complete the qualifying moves due to economic necessity to be together. For example,

- If the child moved **as** the worker, the QAD is the date the **child arrived**.
- If the child moved **with** the worker, the QAD is the date the **child and the worker arrived**.
- If the child’s move **preceded** the migratory worker’s move, the QAD is the date that **the migratory worker arrived**.
- If the child’s move **followed** the migratory worker’s move, the QAD is the date the **child arrived**.¹⁸

¹⁵ Non-Regulatory Guidance, Chapter II, #E4.

¹⁶ Non-Regulatory Guidance, Chapter II, #B2.

¹⁷ Non-Regulatory Guidance, Chapter II, #B3.

¹⁸ Non-Regulatory Guidance, Chapter II, #E4.

Eligibility Requirement 4: Migratory Agricultural Worker or Migratory Fisher



The **child** made a **qualifying move** within the preceding 36 months **as, with or to join** a **parent/guardian** or **spouse** who is a **migratory agricultural worker** or **migratory fisher**.

Definition of migratory agricultural worker or migratory fisher:

- (a) The [migratory agricultural worker](#) or [migratory fisher](#) made a [qualifying move](#) in the preceding 36 months, and
(must include either b or c)
- (b) after doing so [engaged in](#) new [temporary](#) or [seasonal](#) employment or [personal subsistence](#) in [agriculture](#) or [fishing soon after the move](#), or
- (c) if the individual [did not engage in such new employment soon after the move](#),
 - (i) The individual [actively sought](#) such new employment, and
 - (ii) The individual has a [recent history of moves](#) for [temporary](#) or [seasonal](#) employment in [agriculture](#) or [fishing](#)

A migratory child must make a qualifying move as, with or to join a **migratory agricultural worker** or **migratory fisher**.

Migratory Agricultural Worker

The term **migratory agricultural worker** means an individual who is at least fourteen (14) years old, who made a **qualifying move** in the preceding 36 months and, after doing so, **engaged** in new **temporary** or **seasonal employment** or **personal subsistence** in agriculture, which may be dairy work or the initial processing of raw agricultural products.

If an individual did not engage in such new employment **soon after the move**, the individual may be considered a **migratory agricultural worker** if he or she meets both of the following criteria:

1. The individual actively sought such new employment; and
2. The individual has a **recent history of moves** for temporary or seasonal agricultural employment.¹⁹

Migratory Fisher

The term **migratory fisher** means an individual who is at least fourteen (14) years old, who made a **qualifying move** in the preceding 36 months and, after doing so, **engaged** in new **temporary** or **seasonal employment** or **personal subsistence** in fishing.

If the individual did not engage in such new employment **soon after the move**, the individual may be considered a **migratory fisher** if he or she meets both of the following criteria:

1. The individual **actively sought** such new employment; and
2. The individual has a **recent history of moves** for temporary or seasonal fishing employment.²⁰

¹⁹ ESEA §1309(2)

²⁰ ESEA §1309(4)

Individuals Engaged in Qualifying Work Soon After the Move

As amended, ESEA establishes that an individual could be considered a **migratory agricultural worker** or **migratory fisher** depending on whether the individual **engaged** in new qualifying work **soon after the move**.

Engaged In

To do or take part in new temporary or seasonal employment or personal subsistence in agricultural or fishing work. To be considered a migratory worker, an individual must be physically engaged in qualifying work for at least 7 nights/8 days within a one-year period.

Soon After the Move

Within 60 days after the qualifying move.²¹

The 60-day window allows for extenuating circumstances which would delay an individual's engagement in new qualifying work immediately after a qualifying move (e.g., local conditions in agricultural or fishing operations, illness or other personal circumstances), while still proving a reasonable temporal (chronological) connection between the move and the worker's engagement in qualifying work. A worker who takes a non-qualifying job for a limited period of time after a move may still be considered a **migratory agricultural worker** or **migratory fisher** based on that move, so long as the worker either engages in new qualifying work that is still "soon after the move" or meets the alternative requirements listed below.²²

Individuals Who Do Not Engage in New Qualifying Work Soon After the Move

An individual who, for whatever reason, **does not engage** in new qualifying work **soon after the move** may only be considered a migratory worker if that individual has both **actively sought** new qualifying work **and** has a **recent history of moves** for qualifying work.

Actively Sought

May occur before or after the qualifying move (e.g., the individual, or someone on his or her behalf, may have: applied for qualifying work at a particular agricultural or fishing job site, applied at a center that coordinates available temporary or seasonal employment, applied for such employment before moving, or have moved reasonably believing, based on newspaper ads or word of mouth, that such work would be available after the move.) The process of actively seeking new qualifying work should happen within 60 days of the move.²³

Recruiters may rely on the worker's statement regarding his or her attempts to obtain new qualifying work. Recruiters must note in the **COMMENTS** section of the COE when and how the individual actively sought qualifying work. The information which would include the worker's statement together with any additional information the recruiter chooses to add based on his or her knowledge of the area and type of work available, should provide sufficient information to the COE reviewers and third parties to assess the reasonableness.²⁴

²¹ Non-Regulatory Guidance, Chapter II, #C5.

²² Non-Regulatory Guidance, Chapter II, #C7.

²³ Non-Regulatory Guidance, Chapter II, #C10.

²⁴ Non-Regulatory Guidance, Chapter II, #C11.

Recent History of Moves

A recent history of moves (at least 2) that resulted in temporary or seasonal agricultural or fishing employment (i.e., qualifying work) within the preceding 36 months of the recruiter's interview.²⁵

Recruiters may rely on the worker's statement regarding his or her history of moves for qualifying work. The recruiter should ask whether the worker has ever moved before and request information on the dates of the moves, and whether the worker, or his or her parent/guardian or spouse, engaged in qualifying work after these moves. The recruiter must note this information in the **COMMENTS** section of the COE. The information, which would include the worker's statement together with any additional information the recruiter chooses to add, should provide sufficient information to allow COE reviewers and third parties to assess the reasonableness.²⁶

Given the plural form of the word "moves" an individual must have made at least two moves for qualifying work within the preceding 36 months of the recruiter's interview.²⁷

The statute uses the phrase "recent history of moves," but does not state that these moves must be "qualifying moves" (i.e., moves from one school district to another or 20 miles or more in districts of at least 15,000 square miles). Therefore, an individual's recent history of moves for qualifying work does not have to meet the distance requirements. However, any such historic moves must meet the regulatory definition of "move" which requires a change from one residence to another residence that occurs due to economic necessity.²⁸

Qualifying Work

The term **qualifying work** means temporary or seasonal employment or personal subsistence in agriculture or fishing.²⁹

Temporary Employment

Work conducted for a limited time frame (usually only a few months, but no longer than 12 months) as stated by the employer or the worker, or as otherwise determined by DEED on a reasonable basis.³⁰

Regulations identify three ways to determine that employment is temporary:

- **Employer Statement** – The employer states that the worker was hired for a limited time frame, not to exceed 12 months;
- **Worker Statement** – The worker states that he or she does not intend to remain in that employment indefinitely (i.e., the worker's employment will not last longer than 12 months);
- **State Determination** – The state has determined on some other reasonable basis that employment will not last longer than 12 months.

²⁵ Non-Regulatory Guidance, Chapter II, #C16.

²⁶ Non-Regulatory Guidance, Chapter II, #C15.

²⁷ Non-Regulatory Guidance, Chapter II, #C17.

²⁸ Non-Regulatory Guidance, Chapter II, #C18.

²⁹ 34 C.F.R 200.81(n)

³⁰ 34 C.F.R 200.81(p)

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.³¹

- The phrase “cycle of nature” is used to describe the basis for why certain types of employment in agricultural or fishing work only occur during certain, limited periods in the year. The length of seasonal employment is based on the distinct period of time associated with the cultivation or harvesting cycles of agricultural or fishing work and is not employment that is continuous or carried on throughout the year.
- Seasonal employment may not last longer than 12 months.

Personal Subsistence

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 fish they catch.³²

Agricultural/Logging

Agricultural Work

The production or initial processing of raw agricultural products, such as crops, poultry, or livestock; dairy work; as well as the cultivation or harvesting of trees that is performed for wages or personal subsistence.³³

For a detailed list of [Agriculture/Logging/Crop Terms](#), refer to page 159.

- All agricultural activities require special comments. See the [COE Comments Menu](#) on page 161 for more detailed information on required comments.
- For the purposes of the Title I-C program, cultivation or harvesting of trees for personal subsistence is not considered qualifying work.

Agricultural Production

Work on farms, ranches, dairies, orchards, nurseries, and greenhouses engaged in the growing and harvesting of crops, plants, or vines, and the keeping, grazing, or feeding of livestock or livestock products for sale. The term also includes the production of bulbs, flower seeds, vegetable seeds, and specialty operations such as sod farms, mushroom cellars, and cranberry bogs.³⁴

Crop

A plant that is harvested for use by people or by livestock.³⁵

- OME considers a crop to be a plant that is harvested for use by people or by livestock. Therefore, the gathering of wild plants such as roots and tubers for personal subsistence may be considered qualifying work.³⁶
- The agricultural production of crops involves work such as preparing land or greenhouse beds, planting, seeding, watering, fertilizing, staking, pruning, thinning, weeding, transplanting, applying pesticides, harvesting, picking, and gathering.³⁷

³¹ 34 C.F.R 200.81(o)

³² 34 C.F.R 200.81(m)

³³ 34 C.F.R 200.81(a)

³⁴ Non-Regulatory Guidance, Chapter II, #F2.

³⁵ Non-Regulatory Guidance, Chapter II, #F3.

³⁶ Title I-C Policy Q&As, April 2018.

³⁷ Non-Regulatory Guidance, Chapter II, #F4.

Livestock

Any animal produced or kept primarily for breeding or slaughter purposes, including, but not limited to, beef cattle, hogs, sheep, goats, and horses. For the purposes of the Title I-C program, livestock does not include animals that are raised for sport, recreation, research, service, or pets. **Animals hunted or captured in the wild are not considered livestock.**³⁸

- The agricultural production of livestock involves raising and taking care of animals described in the definition of livestock. This includes herding, handling, feeding, watering, caring for, branding, tagging, and assisting in the raising of livestock.³⁹

Initial Processing

Work that is beyond the production stage of agricultural work and precedes the transformation of the raw product into something more refined. It means working with the raw product.⁴⁰

- Examples of initial processing work in the poultry and livestock industries include stunning, slaughtering; skinning; eviscerating; splitting carcasses; hanging; cutting; trimming; deboning; and enclosing the raw product in a container.⁴¹
- Examples of initial processing work in the crop industries include cleaning; weighing; cutting; grading; peeling; sorting; freezing; and enclosing the raw products in a container.⁴²
- A product is no longer considered to be in the stage of initial processing once transformation of the raw product into something more refined begins.⁴³

Cultivation of Trees

Work that promotes the growth of trees.⁴⁴

- Examples: soil preparation, plowing or fertilizing land, sorting seedlings, planting seedlings, staking, watering, removing diseased or undesirable trees, applying insecticides, shearing tops and limbs, and tending, pruning, or trimming trees.⁴⁵

Harvesting of Trees

The act of gathering or taking of the trees.⁴⁶

- Examples: topping, felling, and skidding. This does not include harvesting for personal use.⁴⁷
- **CLEARING TREES IN PREPARATION FOR CONSTRUCTION, TRIMMING TREES AROUND POWER LINES, and CUTTING LOGS FOR FIREWOOD** are not considered part of the cultivation or harvesting of trees.⁴⁸
- The transporting of trees is not agricultural work for purposes of the Title I-C program because it occurs after the cultivation or harvesting trees.⁴⁹
- The initial processing of trees is considered agricultural work for the purposes of the Title I-C program because trees are a raw agricultural product.⁵⁰

³⁸ Non-Regulatory Guidance, Chapter II, #F6.

³⁹ Non-Regulatory Guidance, Chapter II, #F7.

⁴⁰ Non-Regulatory Guidance, Chapter II, #F20.

⁴¹ Non-Regulatory Guidance, Chapter II, #F21.

⁴² Non-Regulatory Guidance, Chapter II, #F22.

⁴³ Non-Regulatory Guidance, Chapter II, #F24.

⁴⁴ Non-Regulatory Guidance, Chapter II, #F9.

⁴⁵ Non-Regulatory Guidance, Chapter II, #F10.

⁴⁶ Non-Regulatory Guidance, Chapter II, #F11.

⁴⁷ Non-Regulatory Guidance, Chapter II, #F12.

⁴⁸ Non-Regulatory Guidance, Chapter II, #F13.

⁴⁹ Non-Regulatory Guidance, Chapter II, #F4.

⁵⁰ Non-Regulatory Guidance, Chapter II, #F15.

Fishing

Fishing Work

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.⁵¹

For a detailed list of [Commercial Fishing Terms](#), refer to page 158. For a detailed list of [Subsistence Fishing Terms](#), refer to page 158.

- **CATCHING FISH FOR SPORT OR RECREATIONAL PURPOSES** is not qualifying work for the Title I-C program.⁵²
- Qualifying activities are performed by fishers, or by the operator of a commercial fishing vessel, and/or any assistant on board. The migratory fisher must be an integral part of the fishing activity.

Fish Farm

A tract of water, such as a pond, a floating net pen, a tank, or a raceway reserved for the raising or harvesting of fish or shellfish. Large fish farms sometimes cultivate fish in the sea, relatively close to the shore. The fish are artificially cultivated, rather than caught, as they would be in “fishing.”

- Fish species raised on fish farms may include: catfish, tilapia, salmon, cod, carp, eels, oysters, and clams.⁵³
- Examples of qualifying work on a fish farm include raising, feeding, grading, collecting, and sorting of fish, removing dead or dying fish from tanks or pens, and constructing nets and cages.⁵⁴

Initial Processing

Work that is beyond the production stage of fishing work precedes the transformation of the raw product into something more refined. It means working with the raw product.⁵⁵

- Examples of initial processing work in the fishing industry include scaling, cutting, freezing, dressing and enclosing the raw product in a container.⁵⁶
- A product is no longer considered to be in the stage of initial processing once transformation of the raw product into something more refined begins.⁵⁷

⁵¹ 34 C.F.R 200.81(c)

⁵² Non-Regulatory Guidance, Chapter II, #F19.

⁵³ Non-Regulatory Guidance, Chapter II, #F17.

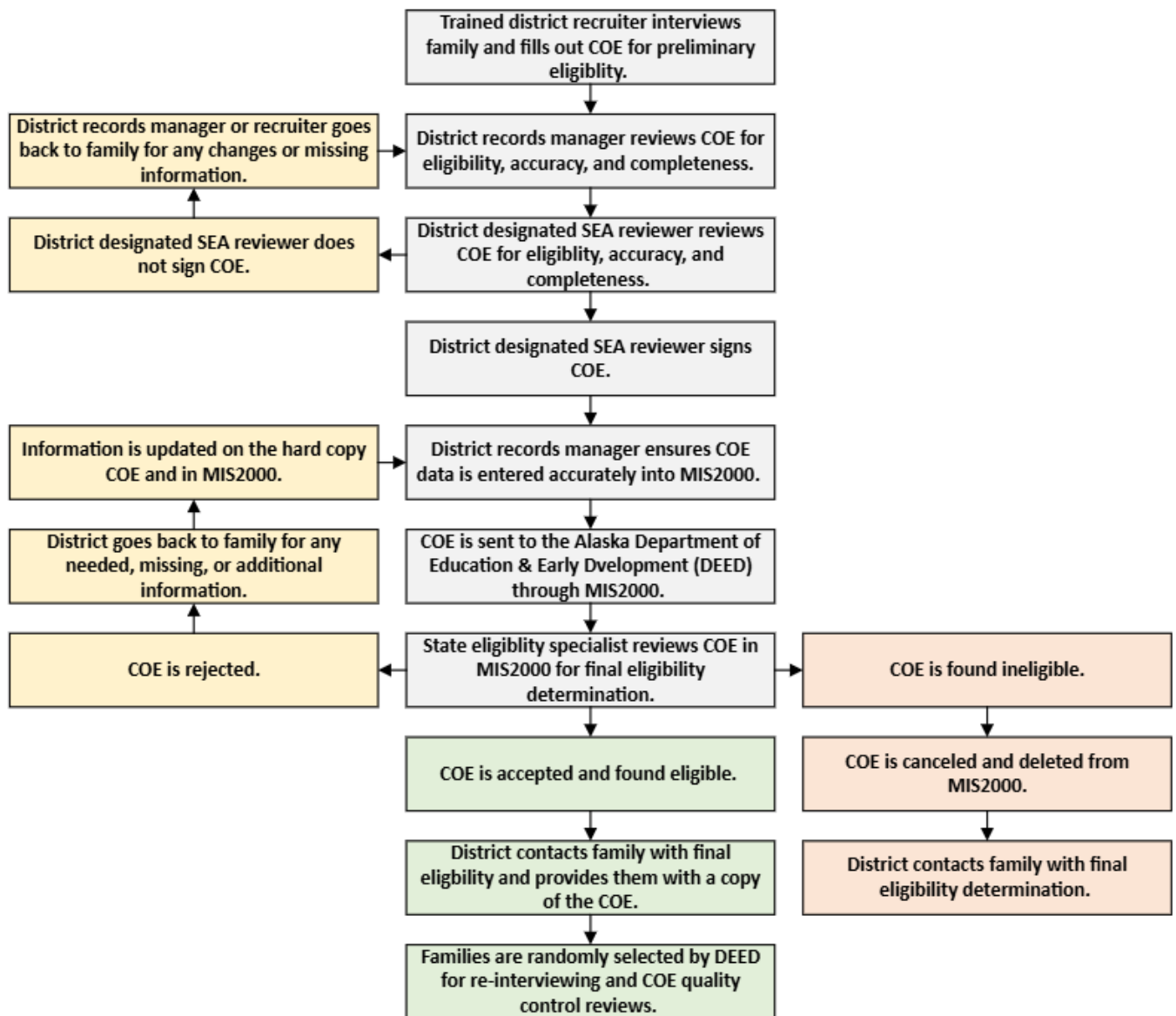
⁵⁴ Non-Regulatory Guidance, Chapter II, #F18.

⁵⁵ Non-Regulatory Guidance, Chapter II, #F20.

⁵⁶ Non-Regulatory Guidance, Chapter II, #F23.

⁵⁷ Non-Regulatory Guidance, Chapter II, #F24.

Eligibility Determination Process



Determining Eligibility

Determining eligibility for the Title I-C program is not a simple task. Interpreting Title I-C education rules is difficult when considering a family's unique situation. For this reason, the recruiter should take special care to collect complete and accurate information during the interview.

In making the initial eligibility determination, the recruiter should always keep in mind the intent of the program. The intent of the Title I-C program is to meet the needs of the children whose education or living situations are somehow disrupted because of moves they make, due to economic necessity, with family members that have performed seasonal or temporary fishing work, logging, or agriculture work. In making an eligibility determination, the decision must be based on facts and evidence, not simply on gut feelings, because that may result in an inaccurate determination.

- A trained recruiter interviews the family and fills out the COE for preliminary eligibility.
- The COE is reviewed by the records manager, the designated SEA reviewer, and DEED. The district staff goes back to the family for any needed, missing, or additional information.
- By signing the COE, each district staff member certifies that the COE is complete, filled out correctly, and that the information meets Title I-C program eligibility requirements.
- The records manager ensures that COE data is entered into MIS2000 accurately before submitting it to DEED.
- A final eligibility determination is made by DEED. Recruiters and records managers do not determine final eligibility.
- If there are questions or doubts regarding eligibility or other unusual factors at the district level, the district office should contact DEED.
- Children are not eligible for services in the Title I-C program until the COE is approved by DEED.
- The district contacts the family with final eligibility and sends them a copy of the paper COE.

Prospective Re-interviewing

The United States Department of Education's Office of Migrant Education requires each state to conduct an annual review of the program's eligibility determinations. Re-interviewing may alert DEED to misunderstandings of the eligibility requirements at the district level. It may also help to find clerical or computer errors. The prospective re-interviews are conducted by trained and qualified personnel who are independent of the original interviews. The prospective re-interviews may be conducted either in-person or by telephone.

Interviewees are selected from a random child list generated by MIS2000. Interviews are conducted using a standard eligibility interview form. Following the interview, the answers from the form are compared to the COE. If the information contradicts the information on the COE or indicates that the family is not eligible for the Title I-C program, a member of the DEED Title I-C team will bring the COE and issues raised during the re-interview to the attention of the records manager. The records manager will then have the opportunity to provide additional information such as notes from the recruiter, further information regarding the family's migratory moves, and other pertinent information. DEED staff will work with district staff until all questions and data integrity issues are resolved.

- An interviewee signature on a COE certifies that a parent is willing to talk to a representative from DEED, should they be contacted.

Certificate of Eligibility (COE) Form

The following pages provide a step-by-step guide on how to fill out each of the required sections of a COE. Guidance provided in this handbook is aligned to the U.S. Department of Education's National COE Instructions. The data elements required in each section are discussed in greater detail on the following pages.

Sections of the COE	Beginning of Section
Top of COE	41
Child Data Section	42
Family Data Section	48
Qualifying Moves & Work Section	51
Additional Qualifying Moves Section	62
Comments Section	63
Interviewee Section	67
Eligibility Data Certification Section	68

All attempts should be made to complete all data elements and sections of the COE. In cases where a response may not be required or does not apply, the recruiter must write a dash (-) or "N/A" in the appropriate blank unless instructed not to when completing a hard copy or electronic (PDF) COE. **Do NOT** write a dash (-) or "N/A" when inputting COEs into the [Alaska Migrant Web System](https://ak.msedd.com) (ak.msedd.com).

When to Fill Out a COE

Use the following procedures when:

- a child is **new** to the Title I-C program, or
- a child is already in the Title I-C program and has **made a new qualifying move** since the last parent interview, or
- a child is already in the Title I-C program and has **moved into the recruiter's district** from another district or state.

For the district to recruit a potentially eligible migratory child, the child must first meet the four [eligibility requirements](#), which are outlined beginning page 24. Additionally, one of the following must be true:

1. The child is living in the recruiter's district;
2. The child is attending school in the recruiter's district; or
3. The child is being served with Title I-C funds by the recruiter's district.

Refer to page 154 for a flowchart regarding [when to fill out a COE](#).

Changes to the COE Form

- The school year was updated to 2026-2027.

CERTIFICATE OF ELIGIBILITY

ALASKA DEPARTMENT OF EDUCATION & EARLY DEVELOPMENT

COE ID#: _____

SCHOOL YEAR: 2026-2027

SCHOOL DISTRICT NAME: _____

RESIDENCY DATE: _____

CHILD DATA

Student ID	Last Name	Last Name 2	First Name	Middle Name	SUF	Birth Date	Sex	MB	EB	VER	School Name	Enroll Date	GR

FAMILY DATA

Parent/Guardian 1 Name: _____ Telephone: _____ Email: _____

Parent/Guardian 2 Name: _____ Telephone: _____ Email: _____

Current Address: _____ City: _____ State: _____ Zip: _____

Mailing Address: _____ City: _____ State: _____ Zip: _____

QUALIFYING MOVES & WORK SECTION

1. The child(ren) listed on this form moved due to economic necessity from a residence in _____ to a residence in _____.

2. The child(ren) moved (complete both a. and b.):

a. ☐ as the worker, OR ☐ with the worker, OR ☐ to join or precede the worker.

b. The worker _____, is ☐ the child, OR child(ren)'s ☐ parent/guardian ☐ spouse.

i. (Complete if "to join or precede" is checked in #2a.) The child(ren) moved on _____.

The worker moved on _____ (provide comment)

3. The worker moved due to economic necessity on _____, from a residence in _____ to a residence in _____.

a. ☐ engaged in qualifying work soon after the move (provide comment if worker engaged more than 60 days after the move); OR

b. ☐ actively sought new qualifying work AND has a recent history of moves for qualifying work (provide comment)

4. The qualifying work, * _____, was (make a selection in both a. and b.):

a. ☐ seasonal OR ☐ temporary employment

b. ☐ agricultural OR ☐ fishing work

5. (Complete if "temporary" is checked in #4a) The work was determined to be temporary employment based on:

a. ☐ worker's statement (provide comment), OR

b. ☐ employer's statement (provide comment), OR

c. ☐ State documentation for _____.

6. The child(ren)'s Qualifying Arrival Date was _____.

ADDITIONAL QUALIFYING MOVES

The child(ren) listed above made additional qualifying moves as, with or to join a migratory agricultural worker or migratory fisher during the last year to establish a pattern of mobility. MM/DD/YY to MM/DD/YY = Nights

_____	To	_____	=	_____
_____	To	_____	=	_____
_____	To	_____	=	_____
_____	To	_____	=	_____
_____	To	_____	=	_____

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.

Signature of Interviewee

Printed Name

ELIGIBILITY DATA CERTIFICATION

I certify that based on the information provided to me, which in all relevant aspects is reflected above, I am satisfied that these children are migratory children as defined in 20 U.S.C. 639g and implementing regulations, and thus eligible as such for MEP services. I hereby certify that, to the best of my knowledge, the information is true, reliable, and valid and I understand that any false statement provided herein that I have made is subject to fine or imprisonment pursuant to 18 U.S.C. 1001.

Relationship to the child(ren)

Date

Signature of Interviewer

Printed Name

Date

Signature of Designated SEA Reviewer

Printed Name

Date

Signature of Department of Education & Early Development

Form # 05-23-028

Top of COE Walkthrough

CERTIFICATE OF ELIGIBILITY

ALASKA DEPARTMENT OF EDUCATION & EARLY DEVELOPMENT
COE ID#:

SCHOOL DISTRICT NAME: _____
RESIDENCY DATE: _____

SCHOOL YEAR: 2026-2027

School District Name

Print the name of the school district (no abbreviations). Refer to page 142 for a list of school districts found in the [School District Boundaries](#) section.

School Year

The current school year is preprinted on the upper right corner of the COE.

COE ID#

This number will be auto generated for COEs created through the Web System. For COEs not created in the Web System, records managers will fill this space with the computer-generated number from MIS2000 once the COE has been entered into MIS2000. **Do not record a dash in this field.**

Residency Date

This is the date the family establishes or reestablishes residency in the recruiter's district. Record the date, using two-digit numbers that refer to the month and day, and the last two digits of the year, (MM/DD/YY) that the child(ren) moved to (i.e., arrived in) the recruiter's school district after the most recent qualifying move.

- If the child(ren) is eligible for the Title I-C program based on a qualifying move prior to the move into the recruiter's school district (i.e., the move into the recruiter's district is not a qualifying move), the residency date will be later than the qualifying arrival date (QAD).
- If the child(ren) and the worker make a permanent move together (at the same time) into the recruiter's district, and that move is a qualifying move for economic necessity, then the Residency Date and the QAD will be the same.
- If the child(ren) moved prior to the worker's move, the residency date would precede the QAD.
- Note, although it is possible to record a residency date that precedes the QAD, a COE cannot be filled out, and a child cannot be enrolled in the Title I-C program until after the child and worker each make a qualifying move. This situation is not common and would only be possible in the case of a permanent move to a new district where a child moved first, and the worker joined the child in the new district later.

Child Data Section Walkthrough

CHILD DATA													
Student ID	Last Name	Last Name 2	First Name	Middle Name	SUF	Birth Date	Sex	MB	EB	VER	School Name	Enroll Date	GR

Child data includes the name, birth date, sex, and school enrollment information for each child listed on the COE. A recruiter should include all children with the same family and eligibility data on the same COE. If any of the family data or eligibility data is different (including different **QAD**, **RESIDENCY DATE**, or **ADDITIONAL QUALIFYING MOVES**) the children should be documented on separate COEs.

Reminders:

- List all eligible children in the family who made the qualifying move from **youngest to oldest** with the youngest child at the top of the list.
- Include children whose ages were from birth up to age 20 at the time of the qualifying move (up to age 22 with an active IEP on file with the district).
- For COEs not created in the Web System, if there are more than five children who made the qualifying move (and have all the same family and eligibility data), list the additional children on a second COE. All sections of the second COE must be completed. Obtain all signatures on both copies of the COE and staple them together. All children will be listed under one COE ID# in MIS2000.
- Only children who have made the same move with the same worker should be listed on one COE.** If some of the children in the family made qualifying moves to other locations or on different dates or with different workers, they should be listed on a separate COE.

Student ID

If a child is enrolled in a public school, the records manager can obtain the child's Alaska Student ID (AKSID) from the district registrar. For children who have never been enrolled in an Alaska public school, MIS2000 will generate a place holder number. If a child's Alaska Student ID is not known, leave this space blank. Do not enter any other number in this space, including school or district identification numbers. **Do not record a dash in this field.**

Last Name 1

Record the legal last name of each eligible child in the family. If the child has a multiple or hyphenated last name (e.g., Ramírez-García), record the first part of the name (i.e., Ramírez).

Last Name 2

If the child has a multiple or hyphenated last name (e.g., Ramírez-García), record the second part of the name (i.e., García). If the child has more than two last names, record the entire name in the correct order in the **COMMENTS** section.

First Name

Record the legal first name of each eligible child in the family. This is the name given to the child at birth, baptism, during another naming ceremony, or through a legal name change. **Do not record nicknames or shortened names** (e.g., Ale or Alex for Alejandra).

Middle Name

Record the legal middle name of each eligible child in the family. This is the secondary name given to the child at birth, baptism, or during another naming ceremony, or through a legal name change. Do not record nicknames or shortened names (e.g., Ale or Alex for Alejandra). It is best practice to obtain the child's middle name by asking the interviewee during the interview, instead of relying on student records. It is possible to fit multiple middle names in the **MIDDLE NAME** field in the Web System, but if there is insufficient space, only list the child's first middle name in the **MIDDLE NAME** field and include all middle names in the **COMMENTS** section.

Suffix (SUF)

Where applicable, record the child's generation in the family (e.g., Jr., Sr., III, 3rd).

Birth Date

Record the month, day, and year the child was born. Use the two-digit number that refers to the month and day, and the last two digits of the year. For example, September 20, 2009, would be written as 09/20/09.

Sex

Record the child's sex.

Code	Sex
M	Male
F	Female

Multiple Birth Flag (MB)

Record **Y** if the child is a twin, triplet, or other multiple births. Write **N** if the child is not a twin, triplet, etc.

Code	Multiple Birth (MB) Type
Y (Yes)	Twin, Triplet, or Other Multiple Birth
N (No)	Single Birth

Ethnic Breakdown (EB)

Ask the parent/guardian for the child's ethnic background and enter only one **EB** code. Do not make assumptions. The district can choose to use previously verified PowerSchool records to get this information. However, the parents should always confirm it is correct.

Code	Race/Ethnic Breakdown (EB)
1	White
2	Black or African American
3	Hispanic/Latino
4	Asian
5	American Indian
6	Alaska Native
7	Two or More Races
8	Native Hawaiian or Other Pacific Islander

Birthdate Verification Code (VER)

Record the four-digit code that corresponds to the evidence used to confirm each child's birth date. If written evidence is not available, the interviewer may rely on the interviewee's verbal statement. In such cases, the interviewer should record 1007 – the number that corresponds to parent's affidavit. When creating the COE in the Web System there is a drop-down box listing the various **VER** types.

Code	Birth Date Verification (VER) Type
1003	Baptismal or Church Certificate
1004	Birth Certificate
1005	Entry in Family Bible
1006	Hospital Certificate
1007	Parent's Affidavit
1008	Passport
1009	Physician's Certificate
1010	Previously Verified School Records
1011	State Issued ID
1012	Driver's License
1013	Immigration Document
2382	Life Insurance Policy
9999	Other

School Name

Print the name of the school where the child is enrolled (no abbreviations). This field cannot be left blank. All children will have information recorded in this field. Migratory children can be:

- enrolled in a public school in the recruiter's district,
- enrolled in a non-public school in a recruiter's district,
- not enrolled in school,
- enrolled in a public school in another district, or
- enrolled in a non-public school in another district.

Refer to the [School Name/Enroll Date/Grade Flowchart](#) on page 156 and the [School Name/Enroll Date/Grade Scenarios](#) on page 46 for more detailed information on how to accurately complete this field.

Enroll Date

The first day of school in the current school year that the child attends after the most recent qualifying move. All children will have an **ENROLL DATE** with two exceptions:

1. children who are too young to be enrolled in school (i.e., babies)
2. children who have dropped out of school (i.e., out of school youth)

Refer to the [School Name/Enroll Date/Grade Flowchart](#) on page 156 and the [School Name/Enroll Date/Grade Scenarios](#) on page 46 for more detailed information on how to accurately complete this field.

The **ENROLL DATE** must be the same as, or after, the **RESIDENCY DATE**. See the example below for how to record the information when a qualifying move interrupts the school year.

Example: A child started school at the beginning of the school year (08/17/26) but left due to a migratory move in September (09/09/26). The move was for seven nights/eight days. When this mid-year migratory move is documented on the COE, the **ENROLL DATE** should be the date the child returned to school after the migratory move (09/16/26).

Grade

Enter the child's current grade at the time the COE is completed. A grade must be listed for every child who is enrolled in a school program whether it is home school, private school, or in a school operated by the district. Children attending preschool programs will have **PS** reported for their grade. Children not yet attending any school are listed as grade **00**. Children who were in school at some point but are no longer attending are listed as grade **OY**.

Code	Grade (GR)
00	Not Yet in School
PS	Preschool
K	Kindergarten
1	First Grade
2	Second Grade
3	Third Grade
4	Fourth Grade
5	Fifth Grade
6	Sixth Grade
7	Seventh Grade
8	Eighth Grade
9	Ninth Grade
10	Tenth Grade
11	Eleventh Grade
12	Twelfth Grade
OY	Out of School Youth

School Name/Enroll Date/Grade Scenarios

Below are examples of different scenarios showing how to fill out the **SCHOOL NAME**, **ENROLL DATE**, and **GRADE** on the COE and COE Recert. Refer to the [School Name/Enroll Date/Grade Flowchart](#) on page 156 for more information.

For Children Attending School in the Recruiter's District

Enrolled in a Public School in the Recruiter's District

This scenario pertains to children from **preschool to grade 12** enrolled in any **public school operated by the recruiter's district**. This includes the recruiter's district operated public schools, preschools, charter schools, and homeschools. **This scenario does not include Head Start programs.**

Example Scenario: You are a recruiter for Mat-Su School District. The child you are recruiting lives in Mat-Su School District and is enrolled at Palmer Middle School, a public school operated by the Mat-Su School District. The child is in the 7th grade and their first day of school after their most recent qualifying move for the current school year was 08/17/26.

SCHOOL NAME	ENROLL DATE	GR
PALMER MIDDLE SCHOOL	08/17/26	7

Required Comment: None

Enrolled in a Non-Public School in the Recruiter's District

This scenario pertains to children from **preschool to grade 12** enrolled in any **non-public school located within the recruiter's district boundaries**. Non-public schools include Head Start programs, private schools, and homeschools (not operated by any public school district). The name of the school they attend and the name of the school district that the non-public school is located within must be recorded in the **COMMENTS** section.

Example Scenario: You are a recruiter for Mat-Su School District. The child you are recruiting is enrolled at Valley Christian School, a private school. The child is in the 3rd grade and their first day of school after their most recent qualifying move for the current school year was 08/24/26.

SCHOOL NAME	ENROLL DATE	GR
MAT-SU NON-PUBLIC SCHOOL	08/24/26	3

Required Comment: The child is enrolled at Valley Christian School in the Mat-Su School District.

For Children Not Attending Any School

Not Yet in School (Too young to enroll)

This scenario pertains to children/babies who are **too young to enroll** in school.

Example Scenario: You are a recruiter for Mat-Su School District. The child you are recruiting is too young to be enrolled in school but went on the qualifying move.

SCHOOL NAME	ENROLL DATE	GR
MAT-SU SCHOOL DISTRICT	-	00

Required Comment: None

Not Enrolled in School (Out of School Youth)

This scenario pertains to children who were in school at some point but **are no longer attending**. These children must not have a high school diploma. They can, however, possess a GED.

Example Scenario: You are a recruiter for the Mat-Su School District. The child you are recruiting has dropped out of school.

SCHOOL NAME	ENROLL DATE	GR
MAT-SU SCHOOL DISTRICT	-	OY

Required Comment: None

For Children Going to School in Another District

Enrolled in a Public School Operated by Another District

This scenario pertains to children who are enrolled in any State of Alaska public school, including preschool and homeschools that are located in and/or operated by any district other than the recruiter's district. The school district name and the name of the school the child is enrolled in must be recorded in the Comments section.

Example Scenario: You are a recruiter for Mat-Su School District. The child you are recruiting resides in Mat-Su School District, but is enrolled at Mt. Edgecumbe High School, a public high school operated by Mt. Edgecumbe School District. The child is in the 10th grade and their first day of school after their most recent qualifying move for the current school year was 08/17/26.

SCHOOL NAME	ENROLL DATE	GR
MAT-SU ANOTHER DISTRICT: PUBLIC	08/17/26	10

Required Comment: The child is enrolled in Mt. Edgecumbe School District and is attending Mt. Edgecumbe High School.

Enrolled in a Non-Public School Located in Another District

This scenario pertains to children from **preschool to grade 12** enrolled in any **non-public school located in a district other than the recruiter's district**. Non-public schools include private schools, homeschools, Head Start programs, and preschools not operated by any public school district. The school the child is enrolled in, as well as the district the school is located in, must be recorded in the **COMMENTS** section.

Example Scenario: You are a recruiter for Mat-Su School District. The child you are recruiting is enrolled in CCS Learning, a preschool that is located in the Anchorage School District but is not operated by any school district. The child's first day of preschool after their most recent qualifying move for the current school year was 08/17/26.

SCHOOL NAME	ENROLL DATE	GR
MAT-SU ANOTHER DISTRICT: NON-PUBLIC	08/17/26	PS

Required Comment: The child is enrolled in CCS Learning, located in the Anchorage School district.

Family Data Section Walkthrough

FAMILY DATA

Parent/Guardian 1 Name: _____	Telephone: _____	Email: _____
Parent/Guardian 2 Name: _____	Telephone: _____	Email: _____
Current Address: _____	City: _____	State: _____ Zip: _____
Mailing Address: _____	City: _____	State: _____ Zip: _____

In this section of the COE, the recruiter will record the contact information for the child(ren) and name of the child(ren)'s parent(s)/guardian(s) with whom the child(ren) lives in their primary household.

Parent/Guardian 1 Name

Record the name of the individual (if any) **currently** responsible for the child(ren) in the **PARENT/GUARDIAN 1** field. Record this individual's legal last name (or names) and legal first name, in that order.

- If the parent/guardian has two last names or a hyphenated last name, record the individual's last name(s) as it legally exists.
- The term "parent/guardian" on this form and in other sections of these instructions includes a legal guardian or other person who is standing in the place of the parent (*in loco parentis*), such as a grandparent or stepparent with whom the child lives.
- If the child(ren)'s legal parent/guardian is different from the current parent/guardian, it is recommended to provide the name of the child(ren)'s legal parent/guardian in the **COMMENTS** section.
- If there is no parent/guardian information disclosed, or if the child is responsible for his or her own welfare (e.g., emancipated youth), leave field blank, and as applicable, provide a comment in the **COMMENTS** section to provide additional information.
- For children who move as the worker, parent/guardian information will be the person(s) currently responsible for the child.

Parent/Guardian 1 Telephone

Record the 10-digit telephone number, including area code, of **PARENT/GUARDIAN 1**. If the parent/guardian does not have a telephone number, record a telephone number where a message can be left (not a district number).

- When the parent/guardian signs the COE, they agree to be contacted by a representative from the Title I-C program as part of a federal requirement to review random COEs.

Parent/Guardian 1 Email Address

Record the email address of **PARENT/GUARDIAN 1**. If no email address is available, leave the field blank. **This is an optional field.**

Parent/Guardian 2 Name

Record the name of the second individual (if any) **currently** responsible for the child(ren) in the **PARENT/GUARDIAN 2** field. Record this individual's legal last name (or names) and legal first name in that order.

- If the parent/guardian has two last names or a hyphenated last name, record the individual's last name(s) as it legally exists.
- The term "parent/guardian" on this form and in other sections of these instructions includes a legal guardian or other person who is standing in the place of the parent (*in loco parentis*), such as a grandparent or stepparent with whom the child lives.

- If the child(ren)’s legal parent/guardian is different from the current parent/guardian, it is recommended to provide the name of the child(ren)’s legal parent/guardian in the **COMMENTS** section.
- If there is no parent/guardian information disclosed, or if the child is responsible for his or her own welfare (e.g., emancipated youth), leave field blank, and as applicable, provide a comment in the **COMMENTS** section to provide additional information.
- For children who move as the worker, parent/guardian information will be the person(s) currently responsible for the child.

Parent/Guardian 2 Telephone

Record the 10-digit telephone number, including area code, of **PARENT/GUARDIAN 2**. If the parent/guardian does not have a telephone number, record a telephone number where a message can be left (not a district number).

- When the parent/guardian signs the COE, they agree to be contacted by a representative of the Title I-C program as part of a federal requirement to review random COEs.

Parent/Guardian 2 Email Address

Record the email address of **PARENT/GUARDIAN 2**. If no email address is available, leave field blank. **This is an optional field.**

Current Address

Record the physical address, including the complete name of the street or road where the child(ren) currently resides.

- In cases where a formal physical address is not available, include as much other identifying information as possible (e.g., trailer number, rural route, family camp, lot, or landmark).
- P.O. box addresses are not considered physical addresses.

City

Record the name of the city or town where the child(ren) currently resides.

State

Record the postal abbreviation used by the U.S. Postal Service for the state where the child(ren) currently resides. Refer to the [State Abbreviations Key](#) on page 141 for a list of states.

Zip

Record the five or nine-digit zip code where the child(ren) currently resides. The U.S. Postal Service has an [online zip code directory service](https://tools.usps.com/zip-code-lookup.htm) (tools.usps.com/zip-code-lookup.htm).

Mailing Address

Record the mailing address. The mailing address can be a P.O. box address. Include the street name or P.O. box number, city, state, and the five or nine-digit zip code.

- If the mailing address is the same as the physical address, write “same” on the COE hard copy, or select the checkbox for **SAME AS CURRENT ADDRESS** in the Web System.

City

Record the name of the city or town where the child(ren) currently resides.

State

Record the postal abbreviation used by the U.S. Postal Service for the state where the child(ren) currently resides. Refer to the [State Abbreviations Key](#) on page 141 for a list of states.

Zip

Record the five or nine-digit zip code where the child(ren) currently resides. The U.S. Postal Service has an [online zip code directory service](https://tools.usps.com/zip-code-lookup.htm) (tools.usps.com/zip-code-lookup.htm).

Qualifying Moves & Work Section Walkthrough

QUALIFYING MOVES & WORK SECTION

1. The child(ren) listed on this form moved due to economic necessity
from a residence in _____/_____/_____
to a residence in _____/_____/_____.
2. The child(ren) moved (complete both a. and b.):
 - a. ☐ as the worker, OR ☐ with the worker, OR ☐ to join or precede the worker.
 - b. The worker, _____, is ☐ the child, OR child(ren)'s ☐ parent/guardian ☐ spouse.
 - i. (Complete if "to join or precede" is checked in #2a.) The child(ren) moved on _____.
The worker moved on _____. (provide comment)
3. The worker moved due to economic necessity on _____,
from a residence in _____/_____/_____
to a residence in _____/_____/_____, and;
 - a. ☐ engaged in qualifying work soon after the move
(provide comment if worker engaged more than 60 days after the move); OR
 - b. ☐ actively sought new qualifying work AND has a recent history of moves for qualifying work
(provide comment)
4. The qualifying work, * _____, was
(make a selection in both a. and b.):
 - a. ☐ seasonal OR ☐ temporary employment
 - b. ☐ agricultural OR ☐ fishing work

*If applicable, check:
☐ personal subsistence (provide comment)
5. (Complete if "temporary" is checked in #4a) The work was determined to be temporary employment based on:
 - a. ☐ worker's statement (provide comment), OR
 - b. ☐ employer's statement (provide comment), OR
 - c. ☐ State documentation for _____.
6. The child(ren)'s Qualifying Arrival Date was _____.

In this section, record the qualifying moves and qualifying work information, which documents the child's eligibility for the program.

- Throughout this section, the term **worker** refers to the child's parent/guardian or spouse who is a migratory agricultural worker or migratory fisher.
- This term can also apply to a child who is at least 14 years of age and meets the definitions of migratory agricultural worker or migratory fisher.
- The term **qualifying work** as used in this section refers to new temporary or seasonal employment (or personal subsistence) in agriculture or fishing.
- The **qualifying moves** documented in this section are the qualifying moves that meet the Title I-C program eligibility criteria.
- Question 3 documents the move soon after which the worker engaged in new qualifying work (or after which he or she actively sought qualifying work), and question 1 documents the child(ren)'s move as, with, or to join the worker. The information described in question 1 and question 3 do not necessarily have to be the same.

No mistakes may be made in this section. Cross-outs, whiteout, or correction tape is not permitted. Any mistakes in this section would require a rewrite of the hardcopy COE and new signatures to be obtained by all signees.

Question 1: The Child(ren) Moved Due to Economic Necessity

1. The child(ren) listed on this form moved due to economic necessity

from a residence in _____ / _____ / _____ / _____

to a residence in _____ / _____ / _____.

The Title I-C program is predicated on the fact that the moves a child and the migratory worker make are made due to economic necessity. This is considered to mean that – *the child and the worker (if the child is not the worker) moved because they could not afford to stay in the current location. It is the responsibility of the recruiter to verify that all moves described on the COE were made due to economic necessity.*

From a Residence In

This location is the child(ren)'s last place of residency immediately prior to the qualifying move. Provide the **SCHOOL DISTRICT / CITY / STATE / COUNTRY** in which the child(ren)'s move was from. Note that the child(ren) might have made subsequent non-qualifying moves.

- If the child and the worker moved from different previous residences, record the child's prior residence in question 1, and record the worker's prior residence in the **COMMENTS** section.

To a Residence In

This location is where the child(ren) resided immediately following the qualifying move as the worker, with, or to join, the worker. A qualifying move can never be made to a country outside of the United States. Provide the **SCHOOL DISTRICT / CITY / STATE** in which the child(ren)'s move was to. As mentioned previously, the child(ren) might have made subsequent non-qualifying moves.

In school districts which have an area of more than 15,000 square miles:

- The child(ren) and migratory worker must have crossed school district boundaries or have traveled a distance of 20 miles or more, one way, to a temporary residence.
- If the child(ren) migrated a distance of 20 miles or more, one way, to a temporary residence in a school district of more than 15,000 square miles, record the following:
- The name of the school district where the child(ren) resided immediately prior to the qualifying move in the **FROM A RESIDENCE** field; and
- The name of the school district where the child(ren) resided immediately following the qualifying move in the **TO A RESIDENCE** field. This identifies that the move meets the 20 miles criterion.
- If the child(ren) and the migratory worker live in different households, a second map will be required to document that the move for the migratory worker made was at least 20 miles, one way, to a temporary residence within a district with an area more than 15,000 square miles.
- Documentation of the migratory moves within a school district with an area more than 15,000 square miles must exist at the district office in the form of a map with a scale to verify the distance traveled to the temporary residence. The distance must be 20 miles or more, one way.
- The map must have a scale for determining distance and **must be attached** to the COE. The starting point, end point, and route traveled should be clearly marked on the map. Electronically calculated mileage is also acceptable in lieu of a scale. The interviewee will verify the route traveled on the map to ensure the validity of the migratory move.

Question 2: The Child(ren) Moved As, With, or to Join the Migratory Worker

2. The child(ren) moved (complete both a. and b.):

a. ☐ as the worker, OR ☐ with the worker, OR ☐ to join or precede the worker.

b. The worker, _____, is ☐ the child, OR child(ren)'s ☐ parent/guardian ☐ spouse.

i. (Complete if "to join or precede" is checked in #2a.) The child(ren) moved on _____.

The worker moved on _____. (provide comment)

This establishes how the child(ren) made the qualifying move listed in 1, whether that move was made **AS THE WORKER, WITH THE WORKER, or TO JOIN OR PRECEDE THE WORKER.**

As, With, or To Join or Precede the Worker

Check one of the boxes indicating whether the child moved as the worker, with the worker, or to join or precede the worker.

- Mark the box **AS THE WORKER** if the child moved as the worker. A child must be **at least 14 years old** to be considered a worker.
- Mark the box **WITH THE WORKER** if the child(ren) moved with (at the same time as) the worker.
- Mark the box **TO JOIN OR PRECEDE THE WORKER** if the child(ren) moved either before or after the date the worker moved. If this box is marked, also complete **2bi** under **2b**. Note that the child(ren)'s move should occur within 12 months of the worker's move.

The Worker

Record the first and last name (in that order) of the individual who is a migratory agricultural worker or migratory fisher (i.e., the child(ren)'s parent/guardian or spouse, or the child – if the child is at least 14 years of age and meets the definition of migratory agricultural worker or migratory fisher).

Mark the box that indicates whether the worker is the child or the child(ren)'s relationship to the worker (i.e., parent/guardian or spouse).

To Join or Precede the Worker

If the worker moved separately from the child(ren):

- Record the **date that the child(ren) moved** to the school district listed in **question 1**.
- Record the **date the worker moved** to the school district listed in **question 1**.
- Record the reason for the different move dates, and whether the worker moved from a different location than the child(ren), in the **COMMENTS** section.
- Only complete the data fields in **2bi** if the box "to join or precede the worker" is checked in **2a**.

Question 3: The Worker Moved Due to Economic Necessity

3. The worker moved due to economic necessity on _____,
from a residence in _____ / _____ / _____
to a residence in _____ / _____ / _____, and;
- a. ☐ engaged in qualifying work soon after the move
(provide comment if worker engaged more than 60 days after the move); OR
- b. ☐ actively sought new qualifying work AND has a recent history of moves for qualifying work
(provide comment)

This is the move that establishes the individual listed in **2b** as a migratory agricultural worker or migratory fisher. The information listed in the following fields can be different from **question 1**.

The Title I-C program is predicated on the fact that the moves a child and the migratory worker are made due to economic necessity. This is considered to mean that – *the child and the worker (if the child is not the worker) move because they could not afford to stay in the current location. It is the responsibility of the recruiter to verify that all moves described on the COE were made due to economic necessity.*

Moved On

Record the date the worker moved to engage in the migratory work.

From a Residence In

This location is the migratory worker's last place of residency immediately prior to the qualifying move where they engaged in new qualifying work soon after the move.⁵² Note that the migratory worker might have made subsequent non-qualifying moves.

To a Residence In

This location is where the migratory worker resided immediately after the qualifying move. **The worker engaged in new qualifying work soon after the move in this location.**⁵⁸ A qualifying move can never be made to a country outside of the United States. As mentioned previously, the migratory worker might have made subsequent non-qualifying moves.

In school districts which have an area greater than 15,000 square miles:

- The migratory worker must have crossed school district boundaries or have traveled a distance of 20 miles or more, one way, to a temporary residence.
- If the worker migrated a distance of 20 miles or more, one way, to a temporary residence in a school district of more than 15,000 square miles, record the name of the school district where the worker resided immediately prior to and immediately following the qualifying move, in order to identify this move as one that meets the 20 miles criterion.
- Documentation of the migratory moves within a school district with an area more than 15,000 square miles must exist at the district office in the form of a map with a scale to verify the distance traveled to the temporary residence. The distance must be 20 miles or more, one way.
- The map must have a scale for determining distance and **must be attached** to the COE. The starting point, end point, and route traveled should be clearly marked on the map. Electronically calculated mileage is also acceptable in lieu of a scale. The interviewee will verify the route traveled on the map to ensure the validity of the migratory move.

⁵⁸ If the worker did not engage in new qualifying work soon after the move, the worker must have:

- (1) actively sought new qualifying work, and
- (2) a recent history of moves for qualifying work.

Engaged in New Qualifying Work Soon After the Move

Mark **box 2a** if the individual listed as the worker in **question 2b** moved due to economic necessity from a residence in one school district to another, and, soon after doing so, engaged in new temporary or seasonal employment (or personal subsistence) in agriculture or fishing.

- Explain in the **COMMENTS** section if the worker is determined to be a migratory agricultural worker or migratory fisher based on his or her engagement in new qualifying work **more than 60 days** after the qualifying move described in **question 3**.
- Please note that the majority of COEs with **3a** marked will not require a comment. A comment is only required for **3a** if the worker engaged in new qualifying work more than 60 days after the move.

Actively Sought New Qualifying Work, AND has a Recent History of Moves for Qualifying Work

Mark **box 2b** if the individual listed as the worker in **question 2b**, moved due to economic necessity from a residence in one school district to another and actively sought new qualifying work before or after the qualifying move described in **question 3**, and has a recent history of moves for qualifying work.

- Explain in the **COMMENTS** section how and when the worker actively sought new qualifying work. For example, the individual stated that he or she (or someone on his or her behalf) applied for qualifying work at a particular agricultural or fishing job site or applied at a center that coordinates available qualifying work.
- Explain in the **COMMENTS** section the worker's recent history. For example, the recruiter could write, "worker moved from Kotzebue, AK to Shungnak, AK, and set net for salmon in July 2025, and moved from Kotzebue, AK to Buckland, AK, and picked berries in August 2025."

Question 4: The Qualifying Work

4. The qualifying work, _____, was
(make a selection in both a. and b.):

- a. ☐ seasonal OR ☐ temporary employment
b. ☐ agricultural OR ☐ fishing work

*If applicable, check:

☐ personal subsistence (provide comment)

The qualifying work described here relates to the move made for economic necessity in **question 3**, which establishes an individual as a migratory agricultural worker or migratory fisher.

Gear and Activity

To describe the specific agricultural and fishing work, the recruiter will use an action verb (example: beach seining) from one of the **A** lists and a noun (example: salmon) from one of the **B** lists starting on page 158.

- Only one activity and one catch/crop can be listed. When more than one qualifying activity occurs during the move, record the activity and catch that were engaged in for most of the trip in this field. All other activities and catches will be noted in the **COMMENTS** section.

Seasonal or Temporary

- Mark the box for **SEASONAL EMPLOYMENT** if the employment 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. Note: In Alaska, most qualifying work in fishing or agriculture are seasonal.
- Mark the box for **TEMPORARY EMPLOYMENT** if the employment lasts for a limited period of time, usually a few months, but not longer than 12 months. It typically includes employment where the worker states that they do not intend to remain in that employment indefinitely, the employer states that the worker was hired for a limited time frame, or the state has determined on some other reasonable basis that the employment is temporary.

Agricultural or Fishing Work

- Mark the box for **AGRICULTURAL WORK** if the work involves the production or initial processing of raw agricultural products such as crops, poultry, or livestock, dairy work, as well as the cultivation or harvesting of trees. The work may be performed either for wages or personal subsistence.
- Activities that are *not* considered part of the cultivation or harvesting of trees include clearing trees in preparation for construction, trimming trees around electric power lines, and cutting logs for firewood.⁵⁹
- Mark the box for **FISHING WORK** if the work involves the catching or initial processing of fish or shellfish or the raising or harvesting of fish or shellfish at fish farms. The work may be performed either for wages or personal subsistence.
- If more than one type of work is performed during the move listed in question 3, choose the type of work (fishing or agriculture) that the worker was engaged in for the most part. Record the other work type in the **COMMENTS** section.

Personal Subsistence

- Mark the box for **personal subsistence** if 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.
- A comment in the family's own words must be provided in the **COMMENTS** section to document this.

⁵⁹ Non-Regulatory Guidance, Chapter II, #F13.

Commercial Fishing Terms

Qualifying activities are those required for the catching or initial processing of fish or shellfish for commercial sale. During the interview, refer to the lists of [Commercial Fishing Terms](#) on page 158 to show **(A) the type of commercial fishing gear or processing activity** and **(B) the type of catch** that describe what the migratory worker engaged in during the qualifying move described in **question 3** of the **QUALIFYING MOVES & WORK** section. The [Qualifying Work](#) (page 56) description in the **QUALIFYING MOVES & WORK** section on the **COE must match terms from boxes A and B**.

Examples:

- Drift Net (Commercial Fishing Gear), Salmon (Commercial Type of Catch)
- Freezing (Commercial Fish Processing Activity), Halibut (Commercial Type of Catch)

Only **one activity** and **one catch** can be listed in the **QUALIFYING MOVES & WORK** section.

- When more than one qualifying activity occurs during the move, record the activity and catch that the migratory worker engaged in the most during the trip listed in **question 3** of the **QUALIFYING MOVES & WORK** section. All other activities and catches will be noted in the **COMMENTS** section.

When completing the COE in the Web System the terms will be hyphenated with the word commercial.

Example: Drift Net-Commercial, Salmon-Commercial

Subsistence Fishing Terms

Qualifying activities are those required for the catching or initial processing of fish or shellfish for personal subsistence. During the interview, refer to the list of [Subsistence Fishing Terms](#) on page 158 to show **(A) the type of subsistence fishing gear or processing activity** and **(B) the type of catch** that describes what the migratory worker engaged in during the qualifying move described in **question 3** of the **QUALIFYING MOVES & WORK** section. The [Qualifying Work](#) (page 56) description in the **QUALIFYING MOVES & WORK** section on the **COE must match terms from boxes A and B**.

Examples:

- Set Net (Subsistence Fishing Gear), Whitefish (Subsistence Type of Catch)
- Seining (Subsistence Fish Processing Activity), Salmon (Subsistence Type of Catch)

Only **one activity** and **one catch** can be listed in the **QUALIFYING MOVES & WORK** section.

- When more than one qualifying activity occurs during the move, record the activity and catch that were the primary purpose of the trip in the **QUALIFYING MOVES & WORK** section. All other activities and catches will be noted in the **COMMENTS** section.

When completing the COE in the Web System the terms will be hyphenated with the word subsistence.

Example: Set Net-Subsistence, Whitefish-Subsistence

Agriculture/Logging Terms

Qualifying activities for logging are those required for the cultivation and harvesting of trees. A comment must be provided on all agricultural COEs providing a detailed description/explanation of the type of work/job duties performed, and a comment indicating if immediate or extended family members own the land the qualifying work took place on.

During the interview, refer to the list of [Agriculture/Logging Terms](#) on page 159 to show the activity that describes the qualifying work. The [Qualifying Work](#) (page 56) description in the **QUALIFYING MOVES & WORK** section must match one of the activities listed below. **List the name of the logging company on the COE after the activity performed.**

Example: Log Chasing (Logging Activity), Kake Tribal (Name of Logging Company)

Loggers frequently perform multiple activities during one season. **List the company and activity that shows what the worker did the majority of the time.**

Activities that are *not* considered part of the cultivation or harvesting of trees include clearing trees in preparation for construction; trimming trees around electric power lines; and cutting logs for firewood.⁶⁰

Only **one activity** and **one company** can be listed in the **QUALIFYING MOVES & WORK** section.

- When more than one qualifying activity occurs during the move, record the activity and company that the migratory worker engaged in the most during the trip listed in **question 3** of the **QUALIFYING MOVES & WORK** section. All other activities and companies will be noted in the **COMMENTS** section.

Agriculture/Crop Terms

Qualifying activities are those required for the production, harvesting, and initial processing of agriculture products such as grains, fruits, and vegetables. **A comment must be provided on all agricultural COEs providing a detailed description/explanation of the type of work/job duties performed, and a comment indicating if immediate or extended family members own the land where the qualifying work took place.**

During the interview, refer to the list of [Agriculture/Crops Terms](#) on page 159 to show **(A) the type of crop work or processing activity** and **(B) the type of crop** that describes the qualifying work engaged in during the qualifying move described in **question 3** of the **QUALIFYING MOVES & WORK** section. The [Qualifying Work](#) (page 56) description in the **QUALIFYING MOVES & WORK** section on **the COE must match terms from boxes A and B.**

Example: Harvesting (Agricultural Processing Activity), Corn (Type of Crop)

Only **one activity** and **one crop** can be listed in the **QUALIFYING MOVES & WORK** section.

- When more than one qualifying activity occurs during the move, record the activity and crop that the migratory worker engaged in the most during the trip listed in **question 3** of the **QUALIFYING MOVES & WORK** section. All other activities and crops will be noted in the **COMMENTS** section.

When completing the COE in the Web System the terms will be hyphenated with the word subsistence or commercial.

Example: Picking-Subsistence, Berries-Subsistence

⁶⁰ Non-Regulatory Guidance, Chapter II, #F13.

Agriculture/Livestock Terms

Qualifying activities are those required for the production or initial processing of livestock. A comment must be provided on all agricultural COEs providing a detailed description/explanation of the type of work/job duties performed, and a comment indicating if immediate or extended family members own the land where the qualifying work took place.

During the interview, refer to the list of [Agriculture/Livestock Terms](#) on page 159 to show **(A) the type of livestock work or processing activity and (B) the type of livestock** that describes the qualifying work engaged in on the qualifying move described in **question 3** of the **QUALIFYING MOVES & WORK** section. The [Qualifying Work](#) (page 56) description in the **QUALIFYING MOVES & WORK** section on **the COE must match terms from boxes A and B.**

Example: Loading and Unloading Livestock (Livestock Work or Processing Activity), Reindeer (Type of Livestock)

Only **one activity** and **one livestock** can be listed in the **QUALIFYING MOVES & WORK** section.

- When more than one qualifying activity occurs during the move, record the activity and livestock that the migratory worker engaged in the most during the trip listed in **question 3** of the **QUALIFYING MOVES & WORK** section. All other activities and livestock will be noted in the **COMMENTS** section.

Question 5: The Temporary Work Determination (if applicable)

5. (Complete if “temporary” is checked in #4a) The work was determined to be temporary employment based on:
- a. ☐ worker’s statement (provide comment), OR
 - b. ☐ employer’s statement (provide comment), OR
 - c. ☐ State documentation for_____.

If temporary was selected in **box 4a**, one of the following must be checked.

Worker’s Statement

Mark **box 5a** if the work was determined to be temporary employment based on a statement by the worker or the worker’s family, if the worker is unavailable (provide comment). For example, the worker states that he or she only plans to remain at the job for a few months. Provide explanatory comments in the **COMMENTS** section.

Employer’s Statement

Mark **box 5b**. if the work was determined to be temporary employment based on a statement by the employer or documentation obtained from the employer. For example, the employer states that he or she hired the worker for a specific time period (e.g., 3 months) or until a specific task is completed and the work is not one of a series of activities that is typical of permanent employment. Provide explanatory comments in the **COMMENTS** section.

Verification of State Documentation

Mark **box 5c**. upon verification that the State has current documentation to support that the work described in **question 4** is temporary employment for this particular employer.

- **Employer** – identify the employer, whether it is the name of or code for a farmer, a grower, a business, or a corporation, where the worker engaged in qualifying work.

Question 6: The Qualifying Arrival Date

6. The child(ren)'s Qualifying Arrival Date was _____.

Record the **QUALIFYING ARRIVAL DATE (QAD)**, using two-digit numbers to refer to the month and day, and the last two digits of the year. For example, May 20, 2025, would be written as 05/20/25.

The QAD is the date that both the child and worker completed the qualifying move, due to economic necessity, to the school district listed in **question 1**.

- The child must have moved due to economic necessity as a worker, or with or to join a parent/guardian or spouse who is a migratory agricultural worker or migratory fisher.
- As referenced in **question 2a**, the child and worker will not always move together, in which case the QAD would be:
 - the date the child joins the worker who has already moved, or
 - the date the worker joins the child who has already moved.

The QAD is the date that the child's eligibility for the Title I-C program begins, after their COE has been approved by DEED. The QAD is not affected by subsequent non-qualifying moves. For more information on determining the QAD, see the chart below.

Type of Qualifying Move	Qualifying Arrival Date (QAD) – Eligibility Begins
The child moved with the worker.	The QAD is the date the child and worker both arrived .
The child moved before the worker moved.	The QAD is the date the worker arrived where the child was residing.
The child moved to join the worker after the worker moved.	The QAD is the date the child arrived to join the worker.

Qualifying Move vs. Qualifying Arrival Date

The table below compares Qualifying Moves and Qualifying Arrival Dates.

Qualifying Move	Qualifying Arrival Date
• Due to economic necessity • One residence to another • From one school district to another, with specific exceptions ○ For single-district States, must be from one administrative area to another ○ For districts over 15,000 square miles, must be a move of 20 miles or more, one way, to a temporary residence • Must be at least 1 night/2 days with a total of 7 nights/8 days within a one-year period	• Date that begins migratory child's 36 months of eligibility • The date that the child moves as a migratory agricultural worker or migratory fisher, or (if the child was not the migratory worker) the date that the child moves with, or to join, a parent/guardian or spouse that meets the definition of migratory agricultural worker or migratory fisher • If the child and the worker moved together: ○ QAD = date they both arrived • If the child moved before the worker: ○ QAD = date that the worker arrived • If the worker moved before the child: ○ QAD = date the child arrived

Additional Qualifying Moves Section Walkthrough

ADDITIONAL QUALIFYING MOVES

The child(ren) listed above made additional qualifying moves as, with or to join a migratory agricultural worker or migratory fisher during the last year to establish a pattern of mobility. MM/DD/YY to MM/DD/YY = Nights

_____	To _____	= _____
_____	To _____	= _____
_____	To _____	= _____
_____	To _____	= _____
_____	To _____	= _____
_____	To _____	= _____

The **ADDITIONAL QUALIFYING MOVES** section documents any additional qualifying moves the child(ren) made, within the previous 12-month period (365 Days), as, with or to join a migratory agricultural worker or migratory fisher. The additional qualifying moves listed in this box along with the moves established in the **QUALIFYING MOVES & WORK** section help to document a pattern of mobility.

Use this box only if the child(ren) made additional qualifying moves which are not listed in the **QUALIFYING MOVES & WORK** section. List the dates of the other qualifying moves within the past year on the lines provided. The additional qualifying moves should be listed in descending chronological order (more recent moves at the top of the list and oldest moves at the bottom of the list).

All qualifying moves made during the previous one-year period should be listed on the form including:

- any moves that were made during the school year which interrupted the child's education, and
- any moves made during the summer.

Moves should be listed using the two-digit month, day, and year to describe the qualifying move dates. The dates are described as MM/DD/YY to MM/DD/YY. The total number of nights each additional qualifying move encompasses should be listed on the line as a whole number. There are more additional qualifying moves in a one-year period than can fit on the lines provided, please record these additional qualifying moves in the **COMMENTS** section.

- To calculate if an additional qualifying move was within the previous 12-month period of the move documented in the **QUALIFYING MOVES & WORK** section, look at the **RESIDENCY DATE** and then add one day to the **RESIDENCY DATE** and minus a year. Example: If the **RESIDENCY DATE** is 07/06/26, adding one day and subtracting a year would result in 07/07/25. In the example, all moves listed on the COE would need to be fit between 07/07/25 and 07/06/26.

Comments should be provided regarding additional qualifying moves if the additional qualifying move is at all different from the qualifying moves listed in the **QUALIFYING MOVES & WORK** section. Comments should indicate differences in location, activity, catch/crop/livestock, and migratory work as applicable. Information should be included so that an independent reviewer, without prior knowledge, can understand why the eligibility determination has been made.

Please note, if the migratory worker made additional qualifying moves separately (from the child(ren) listed on the form) to engage in new qualifying work to establish them as migratory agricultural worker or migratory fisher, this information will be documented solely in the **COMMENTS** section, not as a part of the **ADDITIONAL QUALIFYING MOVES** section.

Comments Section Walkthrough

COMMENTS Must include 2bi, 3a, 3b, 4, 5a, and 5b of the **Qualifying Moves & Work Section**, if applicable. Must include the **Interviewee Signature Section**, if applicable.

The **COMMENTS** section of the COE allows the recruiter to provide the required comments, as well as any additional information or details that clarify the reasons for the recruiter's eligibility determination. The recruiter should write clear and detailed comments so an independent party who has no prior knowledge of the eligibility determination can understand the recruiter's reasoning for determining that the child may be eligible. **Comments must be completed with the recruiter's initials and date the interview took place.** If comments are added after the initial interview, those comments will need to be initialed and dated as well. Refer to the [COE Comments Menu](#) on page 161 for details on common required comments.

Required Comments

The recruiter must provide comments that clearly explain items **2bi, 3a, 3b, 4*, 5a, or 5b** of the **QUALIFYING MOVES & WORK** section of the COE, if applicable. The recruiter must provide a comment that clearly explains why the interviewee signature was not obtained, if applicable. The district should contact DEED prior to submitting COEs without the interviewee signature.

Section	Description
2bi:	The child(ren) and worker moved separately. If the child(ren) joined or preceded the worker, record the reason for the child's later move or the worker's later move in the specified box or COMMENTS section. If the worker moved from a different school district than the child(ren), record the reason for the different move dates, and whether the worker moved from a different location than the child(ren), in the COMMENTS section.
3a:	The worker engaged in new qualifying work more than 60 days after the qualifying move. Explain why worker is determined to be a migratory worker based on his or her engagement in new qualifying work more than 60 days after the qualifying move described in question 4 of the QUALIFYING MOVES & WORK section.
3b:	The worker did not engage in new qualifying work soon after the qualifying move. In this case, the recruiter must document that: • The worker actively sought new qualifying work; and • The worker has a recent history of moves for qualifying work
4*:	The worker is a migratory agricultural worker or migratory fisher on the basis of personal subsistence , meaning that the worker and the worker's family, as a matter of economic necessity, consume, as a substantial portion of their food intake, the crops, dairy products, or livestock they produce or the fish they catch.
5a or 5b:	The employment is temporary based on the worker's statement or the employer's statement. Record the information provided by the worker or employer regarding how long they expect the employment to last. The comment should be of sufficient length to adequately document how the recruiter came to the eligibility decision.
Interviewee Signature:	The interviewer did not obtain the interviewee's signature. The comment must explain the circumstances that prevented the recruiter from obtaining the interviewee's signature. The district should contact DEED prior to submitting COEs without the interviewee signature. This only pertains to unique circumstances and must have DEED approval.

Additional Comments Required for Various COE Scenarios

In general, the **COMMENTS** section should only include information about the child and the worker's qualifying move (or moves, if more than one) and the qualifying activities that they engaged in during these moves.

- **Additional Qualifying Moves** – If the moves listed in the **QUALIFYING MOVES & WORK** section on the COE do not have enough nights to qualify, and additional qualifying nights were listed, a comment must be provided in the **COMMENTS** section (unless all eligibility information is exactly the same). This comment should include any differences in locations including district and city of the additional qualifying moves, qualifying work, or migratory worker, as applicable. If there are more additional qualifying moves than spaces available on the COE, a comment is required detailing those additional qualifying move(s).
- **Agricultural Moves** – A comment must be provided on all agricultural COEs specifying whether or not immediate or extended family members own the land the qualifying work took place on.
- **Child As the Worker Move** – If an eligible migratory child, who is over the age of 14 makes a qualifying move as the migratory agricultural worker or migratory fisher, the move must directly support the child's primary household and be an economic necessity for the family. Information to reflect that the child's move is necessary for the family to be able to live in their current location must be added in the **COMMENTS** section.
- **Extended Move (30 Day Comment)** – If the **RESIDENCY DATE** is more than 30 days from the **QUALIFYING ARRIVAL DATE** on the COE, a comment is required to verify the actual dates the migratory worker was engaged in qualifying work. This comment ensures the migratory worker was engaged in the qualifying work for at least seven nights/eight days.
- **IEP** – If a child is 20 years of age or older and has an active IEP on file, a comment is required.
- Due to confidentiality in Special Education, recruiters should not directly ask parents about IEPs. This comment may be provided by the records manager and added to the **COMMENTS** section of the COE. If the parents volunteer special education status, it can be noted on the COE.
- **Logging Move** – If the migratory worker was engaged in temporary or seasonal engagement with a logging company, include the name of the company, the address, and contact number in the **COMMENTS** section.
- **Migratory Worker (Guardian)** – The migratory worker is a guardian for the move and is not included in the **FAMILY DATA** section. Record the physical address and phone number of the migratory worker in the **COMMENTS** section, including the city and state. P.O. Box addresses are not considered physical addresses. Record the worker's relationship to the child(ren) listed on the COE in the **COMMENTS** section.
- Include a statement verifying that the child's move is an economic necessity for their family. The statement should clearly show how the family could not afford to live in their current location if the child did not go on this qualifying move and engage in the qualifying work.
- If the qualifying work was for personal subsistence and the worker does not live with the child, the recruiter must verify and provide a statement in the **COMMENTS** section that the move and personal subsistence directly supports both the child's primary household, and the worker's household.
- If the migratory worker lives in the same household as the child, record the worker's relationship to the child and include a statement that the worker lives in the same household.
- **Migratory Worker Residency Date** – If the migratory agricultural worker or migratory fisher's residency date is different than the child's (i.e., the move listed in question 1 is different than the move listed in question 3), this date should be listed in the **COMMENTS** section. The migratory

agricultural worker or migratory fisher must be engaged in qualifying work for at least seven nights/eight days in a one-year period.

- **Moves within Districts with Areas Greater than 15,000 Square Miles (Map Comment)** – A comment is required to document that the moves were at least 20 miles or more, one way, to a temporary residence when the moves are within a 15K+ district. This comment lets the reviewer know that a map with a scale is attached and the distance has been verified by the recruiter using a district map or a digital map (i.e., the Alaska Schools & Education Map or Google Maps). Refer to the [Alaska Schools & Education Map](#) section on page 144 for instructions on how to utilize this map program.
- If the guardian of the migratory move lives in a different location than the child, a separate map with a scale for both the child and the guardian must be attached to the original COE. It is possible to use the same map if the moves for both the child and guardian are clearly marked. A map comment for both the child and guardian must be provided.
- If the move listed in **question 3** of the **QUALIFYING MOVES & WORK** section of the COE is different from the move listed in question 1, and takes places in a 15K+ district, the map should document the move from **question 3**. It is also possible in this scenario that a different map would be required to document the move in **question 1**.
- If additional moves occur within a 15K+ district, either a map with a scale or a map with digitally calculated mileage is required.
- **Multiple Middle Names** – If a child on the COE has multiple middle names and the full name does not fit in the **CHILD DATA** section of the COE, please list the child’s full name in the **COMMENTS** section.
- **Multiple Migratory Workers** – When a migratory child makes multiple qualifying moves within a one-year period and the qualifying moves are made with different migratory workers, a comment is required to verify that each migratory worker has engaged in migratory work for seven nights/eight days within a one-year period. If the additional worker does not live in the child’s primary household, the worker’s name, physical address, phone number, and relationship to the child must be recorded in the **COMMENTS** section.
- **Not Attending School Operated by Recruiting District** – If a child on the COE is enrolled in a public school not operated by the recruiter’s district or is enrolled in a non-public school, list the name of the school the child is attending and the district in which the school is located in the **COMMENTS** section.
 - For more information on school names and required comments, refer to the [School Names, Enroll Dates, and Grades](#) section starting on page 46.
- **Permanent Move** – If a migratory child makes a **permanent move into the recruiter’s district, and that move is a qualifying move**, the **RESIDENCY DATE** and **QAD** will be the date they made the permanent move into the recruiter’s district. A comment is required to verify the actual dates the migratory worker engaged in the qualifying work described in **questions 3 and 4**. It is recommended that the recruiter provide additional comments on the COE when there are **any other circumstances** whereby a third party may question the eligibility determination.
- If the **permanent move into the recruiter’s district was not a qualifying move** (i.e., not made due to economic necessity, or not made as, with, or to join a migratory worker), the **RESIDENCY DATE** will be later than the **QAD**. A comment is required to verify the actual dates the migratory worker engaged in the qualifying work described in **questions 3 and 4**.
- **Pole Fishing** – A comment is required verifying that the pole was not used for either sport or recreation.

- **Series of Short Moves** – For a series of 1 night / 2 day moves, include a statement verifying that the moves are indeed 1 night / 2 day moves with a change of residence and not merely staying past midnight.
- **Unique Situations** – The Title I-C program is predicated on the fact that the moves a child and the migratory worker make, are made due to economic necessity. This is considered to mean that – *the child and the worker (if the child is not the worker) move because they could not afford to stay in the current location.* If the basis of the initial eligibility decision would not be obvious to an independent third-party reviewer, the recruiter should add additional explanatory information to the **COMMENTS** section to attest to the economic necessity of the moves described on the COE.

Recommended Comments

DEED recommends that the recruiter provides additional comments on the COE in the following circumstances and in any other circumstances in which a third party may question the eligibility determination:

- The information on the COE needs additional explanation to be clearly understood by an independent outside reviewer.
- The basis for the preliminary eligibility determination is not obvious. For example, the work is unusual enough that an independent reviewer is unlikely to understand that it is qualifying work. An explanation is needed to enable a reviewer to understand how the preliminary eligibility determination was made.
- The work could be part of a “series of activities” that, viewed together, would constitute year-round employment (e.g., mending fences on a dairy farm and baling hay could be two parts of year-round ranching with one employer).
- The work may be viewed by an independent reviewer as either temporary or year-round employment (e.g., collecting eggs or milking cows).
- A “move” is of such brief duration that one could question whether it was a move from one residence to another residence, due to economic necessity.
- The person who provided the information on the COE form (interviewee) is not the parent/guardian of the child or the worker listed on the COE.
- The child(ren)’s legal parent/guardian(s) differs from the current parent/guardian(s) listed.
- Any children living in the household who did not go on the move.
- Any children on a separate COE/COE Recert due to different move dates, etc.
- Any children over 20 with an active IEP.
- If both parents/guardians do not live in the same household as the child, the recruiter could include name, address, and contact information of the parent/guardian who does not live in the household in the **COMMENTS** section.

A Reminder Regarding Economic Necessity

Though the recruiter is not required to record an economic necessity statement for the moves listed on the COE in the **COMMENTS** section, the recruiter must verify that all the information listed on the COE is correct and that both the child’s and the migratory worker’s moves were made due to economic necessity.

The recruiter should write clear and detailed comments so an independent party who has no prior knowledge of the eligibility determination can understand the recruiter’s reasoning for determining that the child may be eligible. When in doubt, the recruiter should add information to the COE to ensure the economic necessity of the moves is clear and that it is sufficiently documented. **Moves made for personal subsistence are required to provide a personal subsistence statement that includes their economic necessity.**

Interviewee Section Walkthrough

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.

Signature of Interviewee

Printed Name

Relationship to the child(ren)

Date

The person who signs the COE must be the source of the information contained in the document and should verify any information provided by another source. The **INTERVIEWEE** signs and dates the COE on the day the interview is conducted, and the COE is completed.

The Title I-C program is predicated on the fact that the moves a child and the migratory worker make are made due to economic necessity. This is considered to mean that – *the child and the worker (if the child is not the worker) move because they could not afford to stay in the current location.* **By signing the COE, the interviewee is attesting that the qualifying moves described on the COE were made due to economic necessity. By signing the COE, the interviewee is also agreeing to be contacted by a representative from the Title I-C program or a third-party reviewer if a re-interview is required.**

Interviewee Signature Language

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, program. To the best of my knowledge, all of the information I provided to the interviewer is true.

Signature

This signature is required for a child to be enrolled in the Title I-C program. An **INTERVIEWEE** signature is required on all COEs. COEs can be signed manually or electronically. The person who signs the COE must be the source of the information contained in the document and should verify any information provided by another source.

COEs with ink signatures do not have to be original. Signed COEs can be faxed or scanned, as long as the quality of the signatures on the COE are clear. Electronic signatures may be obtained through the [Alaska Migrant Web System](#) or through a district-approved, FERPA-compliant program.

After the parent, or the person interviewed, reviews the COE, and certifies it for accuracy, he/she signs indicating all the information is true to the best of his/her knowledge. Parents and/or migratory workers certify the truth of economic necessity by signing the COE. Without this verification, the child will not be enrolled in the Title I-C program. Furthermore, their signature on a COE also certifies that a parent/guardian is willing to talk to a representative from the state Title I-C program, should they be contacted.

Printed Name

The person who is interviewed legibly prints his/her full name.

Relationship

The person who is interviewed records his/her relationship to the child(ren).

Date

The person who is interviewed records the date on which he/she signed the form.

Eligibility Data Certification Section Walkthrough

ELIGIBILITY DATA CERTIFICATION

I certify that based on the information provided to me, which in all relevant aspects is reflected above, I am satisfied that these children are migratory children as defined in 20 U.S.C. 6399 and implementing regulations, and thus eligible as such for MEP services. I hereby certify that, to the best of my knowledge, the information is true, reliable, and valid and I understand that any false statement provided herein that I have made is subject to fine or imprisonment pursuant to 18 U.S.C. 1001.

Signature of Interviewer

Printed Name

Date

Signature of Designated SEA Reviewer

Printed Name

Date

The Title I-C program is predicated on the fact that the moves a child and the migratory worker make are made due to economic necessity. This is considered to mean that the child and the worker (if the child is not the worker) move because they could not afford to stay in the current location. **By signing the COE, the interviewer and designated SEA reviewer are attesting that the qualifying moves described in the COE were made due to economic necessity.**

Eligibility Data Certification Language

I certify that based on the information provided to me, which in all relevant aspects is reflected above, I am satisfied that these children are migratory children as defined in 20 U.S.C. 6399 and implementing regulations, and thus eligible as such for Title I-C program services. I hereby certify that, to the best of my knowledge, the information is true, reliable, and valid and I understand that any false statement provided herein that I have made is subject to fine or imprisonment pursuant to 18 U.S.C. 1001.

Signature of Interviewer

After completing the interview and entering all necessary information on the COE, the **INTERVIEWER** should review the COE for completeness and accuracy. An **INTERVIEWER** signature is required on all COEs.

- The **INTERVIEWEE** should always sign and verify information on the COE before the **INTERVIEWER** and **DESIGNATED SEA REVIEWER** sign. There will be situations where the **INTERVIEWER** is unable to sign the same day as the interview because the **INTERVIEWEE** has not yet signed the COE. In this case, the interviewer should submit the COE to the **INTERVIEWEE** to sign first, then it should be signed by the **INTERVIEWER** and dated when the COE is returned.
- By signing the COE, the **INTERVIEWER** does not guarantee eligibility.
- A final determination will be made by DEED and then the district will notify the family.
- Recruiters cannot interview, or sign for, their own family.

Signature of Designated SEA Reviewer

A **DESIGNATED SEA REVIEWER** must check each completed COE to ensure that the written documentation is sufficient and that, based on the recorded data, the children on the form are eligible for Title I-C program services. A **DESIGNATED SEA REVIEWER** must sign and date the COE on the day it was reviewed. Note: Any individual signing as the **DESIGNATED SEA REVIEWER** must have a **DESIGNATED SEA REVIEWER** form on file with DEED.

Printed Name

The **INTERVIEWER** and the **DESIGNATED SEA REVIEWER** legibly print their full names.

Date

The **INTERVIEWER** and **DESIGNATED SEA REVIEWER** record the dates on which they reviewed and signed the COE.

Maps

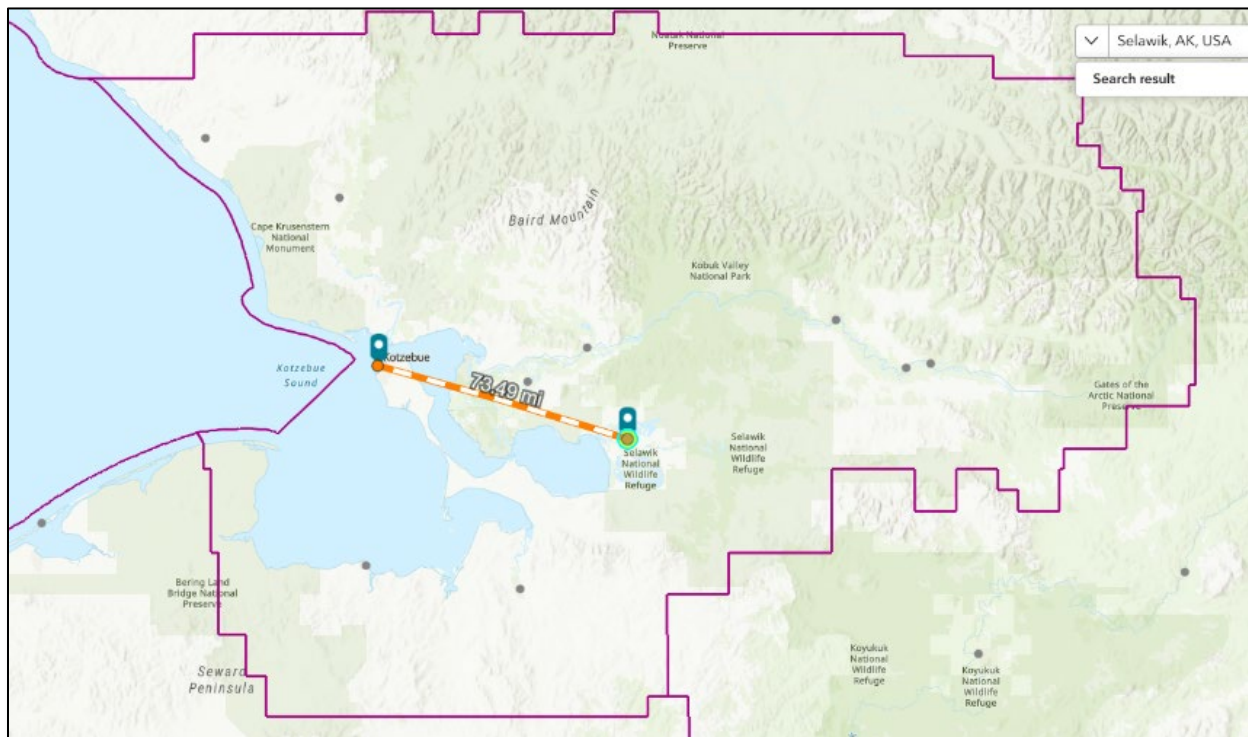
Further documentation is required for qualifying moves within districts with more than 15,000 square miles. **A map is required to document moves of 20 miles or more one way to a temporary residence.** The map must be uploaded to the Web System before the COE is sent for review by the DEED Title I-C team. For a list of districts that are more than 15,000 square miles, refer to page 27.

For COEs created earlier than 2021-2022 that document moves within districts with more than 15,000 square miles, the map must be attached to the original COE. If a physical file is kept, then the COE and the corresponding map must be filed together. If an electronic file is kept, then the district must have a system in place to allow them to identify the corresponding map attached to the COE. Even if a family moves to the same place each year, a map must be attached to every COE. For more information on filing, records managers can refer to the sections on [Physical Records Maintenance](#) (page 91) and [Electronic Records Retention](#) (page 92).

The map must have a legend/scale for determining distance and must be attached to the original COE. Maps attached to COEs must show the starting point, the end point, and the route taken. Electronically calculated mileage is also acceptable in lieu of a scale. Records managers are responsible for ensuring that the maps are properly labeled.

Districts are required to have a map with district boundaries available to recruiters. If a physical map is unavailable, districts can also utilize online mapping tools (e.g., [Google Maps](#) (google.com/maps), [Alaska Schools & Education Map](#) (experience.arcgis.com/experience/c89597c7ea574a42b7e01d5e09cb69d2)).

Instructions on how to use the [Alaska Schools & Education Map](#) (experience.arcgis.com/experience/c89597c7ea574a42b7e01d5e09cb69d2) from the Alaska Community Database Online (CDO) from the State of Alaska's [Community Database Online](#) (dcra-cdo-dcced.opendata.arcgis.com/) can be found starting on page 144.



Important Reminders About COEs

QAD/Residency Date/Enroll Date

In most cases, this is the order of the three most important dates on the COE:

1. **QAD** (Question 6 of the **QUALIFYING MOVES & WORK** section) – The date that the child and migratory agricultural worker or migratory fisher completes the moves. This often, but not always, happens at the location where the migratory worker is engaged in qualifying work.
2. **RESIDENCY DATE** (Top of the COE)– The date when the child returns to, or establishes residency in, the recruiter’s district. This is generally the return date of the trip. This could also include the date the child made a permanent move into the recruiter’s district.
3. **ENROLL DATE** (**CHILD DATA** section) – The first day the child attends school after the qualifying move for the current school year. Often different than the first day of school they attended for the year.

If a migratory child is making a permanent move to the recruiter’s district, the dates could potentially all be the same. For questions about the order of dates, please contact the [DEED Title I-C team](#) (page 184).

Enrolling Transfer Children

All potentially eligible migratory children that have transferred/permanently moved into the recruiter’s district should be interviewed. If the children are currently certified as migratory from another school district, an interview and new COE will still need to be completed by the receiving district.

While the child(ren) needs to make a qualifying move, he or she does not need to go on the move that qualifies the parent/guardian/spouse as a migratory agricultural worker or migratory fisher. If the permanent move to the school district was done for economic necessity and the move was conducted with a parent/guardian/spouse who is a migratory agricultural worker or migratory fisher, then that move could qualify the child(ren) for the Title I-C program.

COE Corrections

Qualifying Moves & Work Section Corrections:

- No corrections may be made in this section of the COE.
- Recruiters often find it helpful to start the COE with the **QUALIFYING MOVES & WORK** section, since no errors are accepted in this section. Any mistakes made require rewriting the entire form and new signatures need to be obtained. Cross-out, whiteout, and correction tape are not permitted.

Corrections on all other sections of the COE:

- Draw a single line through the incorrect information. The original text should still be readable. To distinguish corrections from the original text easily, use blue ink if the original was written in black or black ink if the original was written in blue. Do not use whiteout or correction tape.
- If additional information is added to a newly written COE by the recruiter or records manager, the correct information should be initialed and dated by the person making the change.
- The source of the correct information should be indicated in the **COMMENTS** section.

Additional Information

It may be helpful to fill out a draft of the COE, or another form designed by the district, when collecting information from the parents. Once all the information is collected and the child appears to meet the eligibility requirements, transfer the information onto an official COE. The interviewee must sign the official COE form after it is completed. There are three ways to obtain signatures for COEs created in the Web System: via ink signatures, electronic signatures, or a combination of both. The interviewee and interviewer signatures must be obtained prior to submission of the COE.

COE Recertification (COE Recert) Form

This form is used when eligible migratory children have not made any additional qualifying moves since their last certification, but they are still currently eligible for the Title I-C program. A COE Recert recertifies a child's eligibility in the recruiter's district. Detailed instructions for completing a COE Recert can be found in the [Certificate of Eligibility Recertification \(COE Recert\) Guide](#) starting on page 73. Note: This form was previously called an Annual Recertification of No New Moves (ARC). The name has changed to align with the [Alaska Migrant Web System](#) (ak.msedd.com) processes.

When to Fill Out a COE Recert Form

COE Recert forms can only be used to recertify eligible migratory children in the recruiter's district if all three of the following criteria are met:

1. a child has an active COE in the recruiter's district,
2. a recruiter has contacted the family to confirm a new move was not made since their last interview, and
3. the child is still living in the recruiter's district, the child is attending school in the recruiter's district, or the child is being served by the recruiter's district with Title I-C funds.

Refer to page 155 for a flowchart regarding [When to Fill Out a COE Recert](#).

Changes to the COE Recert Form

- School year has been updated to 2026-2027.

CERTIFICATE OF ELIGIBILITY RECERTIFICATION (COE RECERT)

STATE OF ALASKA DEPARTMENT OF EDUCATION & EARLY DEVELOPMENT

SCHOOL YEAR: 2026-2027

SCHOOL DISTRICT NAME:

End of Eligibility Date:

INSTRUCTIONS

Annual Recertification Forms should only be filled out when:

1. a child still has eligibility in the recruiter's district,
2. a recruiter has contacted the family to confirm a new move was not made since their last interview, and
3. the child is still living in the recruiter's district, the child is attending school in the recruiter's district, or the child is being served by the recruiter's district with MEP funds.

CHILD DATA

Student ID	Last Name 1	Last Name 2	First Name	Middle Name	SUF	School Name	Enroll Date	GR

COMMENTS

ELIGIBILITY DATA CERTIFICATION

I certify that based on the information provided to me, which in all relevant aspects is reflected above, I am satisfied that these children are migratory children as defined in 20 U.S.C. 6399 and implementing regulations, and thus eligible as such for MEP services. I hereby certify that, to the best of my knowledge, the information is true, reliable, and valid and I understand that any false statement provided herein that I have made is subject to fine or imprisonment pursuant to 18 U.S.C. 1001. I certify that the children listed on this form still have eligibility in the district; the family has been contacted to confirm a new move was not made since their last interview; and the children on this form are still living in the district, attending school in the district, or the children are being served by the district with MEP funds.

(Signature of Interviewer)

(Date)

(Signature of Designated SEA Reviewer)

(Date)

Form # 05-15-031

Alaska Department of Education & Early Development

Top of COE Recert Walkthrough

CERTIFICATE OF ELIGIBILITY RECERTIFICATION (COE RECERT)

STATE OF ALASKA DEPARTMENT OF EDUCATION & EARLY DEVELOPMENT

Most Recent Eligible COE ID #: _____

SCHOOL YEAR: _____ **2026-2027**

SCHOOL DISTRICT NAME: _____

End of Eligibility Date: _____

School District Name

Print the name of the recruiter's school district (no abbreviations).

School Year

The current school year is preprinted on the upper right corner of the COE Recert.

Most Recent Eligible COE ID

Record the COE ID number located on the top of the child(ren)'s most recent COE.

End of Eligibility Date

Record the child(ren)'s **END OF ELIGIBILITY (EOE)** date. This date is three years (36 months) from a migratory child's most recent **QUALIFYING ARRIVAL DATE (QAD)** listed on the child(ren)'s most recent COE. After this date a child is no longer eligible for the Title I-C program and services, unless they make another qualifying move.

Instruction Section Walkthrough

INSTRUCTIONS

Annual Recertification Forms should only be filled out when:

1. a child still has eligibility in the recruiter's district,
2. a recruiter has contacted the family to confirm a new move was not made since their last interview, and
3. the child is still living in the recruiter's district, the child is attending school in the recruiter's district or the child is being served by the recruiter's district with MEP funds.

COE Recert forms can only be utilized to recertify a child's Title I-C eligibility if all the following criteria are met:

- a child has eligibility in the recruiter's district, and
- the recruiter has contacted the family to confirm that a new move was not made since their last interview, and
- the child is still living in the recruiter's district, the child is attending school in the recruiter's district, or the child is being served by the recruiter's district with Title I-C funds.

Enrolling Transferring Children Who are Currently Title I-C Eligible

If a child is currently certified as migratory from another school district an interview and new COE will still need to be completed to establish the child's eligibility in the new district and for the district to receive funding. If the permanent move to the school district was done for economic necessity and the move was conducted with a parent/guardian/spouse who is a migratory agricultural worker or migratory fisher, then that permanent move could be recorded as the child's move on the new COE. The qualifying arrival date and the residency date is the date the child and migratory worker moved into the district.

However, if the permanent move to the school district was not for economic necessity, even if it was made with a parent/guardian/spouse who is a migratory worker, then the most recent qualifying move prior to the permanent move should be the qualifying move recorded on the new COE.

Child Data Section Walkthrough

CHILD DATA								
Student ID	Last Name 1	Last Name 2	First Name	Middle Name	SUF	School Name	Enroll Date	GR

The **CHILD DATA** section includes information about the child(ren) including **STUDENT ID**, **LAST NAME 1**, **LAST NAME 2**, **FIRST NAME**, **MIDDLE NAME**, **SUF**, **SCHOOL NAME**, **ENROLL DATE**, and **GRADE**. If any Title I-C eligible children in the household were listed on a separate COE due to different qualifying move information, they need to be listed on a separate COE Recert form.

- Only eligible migratory children living in the same household can be listed on the same COE Recert form.
- If any child(ren) in the household are not Title I-C eligible (this includes children who have reached the end of their eligibility) in the recruiter's district, they cannot be listed on this form.
- Migratory children should be listed from youngest to oldest with the **youngest child at the top**.

Student ID

If a child is enrolled in a public school, the records manager can obtain the child's Alaska **STUDENT ID** from the district registrar. For children who have never been in an Alaska public school, MIS2000 will generate a number. If a child's Alaska **STUDENT ID** is not known, leave this space blank. Do not enter any other number in this space, including school or district identification numbers. **Do not record a dash in this field.**

Last Name 1

Record the legal last name of each eligible child in the family. If the child has a multiple or hyphenated last name (i.e., Ramírez-García), record the first part of the name (i.e., Ramírez).

Last Name 2

If the child has a multiple or hyphenated last name (i.e., Ramírez-García), record the second part of the name (i.e., García). If the child has more than two last names, record the entire name in the correct order in the **COMMENTS** section. If the child does not have a multiple or hyphenated name, leave the field blank.

First Name

Record the legal first name of each eligible child in the family. This is the name given to the child at birth, baptism, during another naming ceremony, or through a legal name change. Do not record nicknames or shortened names (i.e., Ale or Alex for Alejandra).

Middle Name

Record the legal middle name of each eligible child in the family. This is the secondary name given to the child at birth, baptism, during another naming ceremony, or through a legal name change. Do not record nicknames or shortened names (i.e., Ale or Alex for Alejandra). If a child has multiple middle names, list the first middle name only in the **MIDDLE NAME** field and make a comment. If the child does not have a middle name, leave the middle name field blank and provide a comment in the **COMMENTS** section. If the child has an initial for their middle name, record the initial in the **MIDDLE NAME** field and make a comment in the **COMMENTS** section.

Suffix (SUF)

Where applicable, record the child's generation in the family (e.g., Jr., Sr., III, 3rd). Otherwise, leave the field blank.

School Name

Print the name of the school where the child is enrolled (no abbreviations). This field cannot be left blank. All children will have information recorded in this field. Migratory children can be:

- enrolled in a public school in the recruiter's district
- enrolled in a non-public school in a recruiter's district,
- not in school,
- enrolled in a public school in another district, or
- enrolled in a non-public school in another district.

Refer to the [School Name/Enroll Date/Grade Flowchart](#) on page 156 for more detailed information.

Enroll Date

The first day of school the child attends after the most recent qualifying move for the current school year. All children will have an **ENROLL DATE** with two exceptions:

- children who are too young to be enrolled in school (i.e., babies)
- children who have dropped out of school (i.e., out of school youth)

For more information, refer to the [School Name/Enroll Date/Grade Flowchart](#) on page 156.

Grade (GR)

Enter the child's current grade at the time the COE Recert is completed. A grade must be listed for every child who is enrolled in a school program whether it is home school, private school, or in a school operated by the district. Children attending preschool programs will have **PS** reported for their grade. Children not yet attending any school are listed as grade **00**. Children who were in school at some point but are no longer attending are listed as grade **OY**.

For grade codes, refer to the Grade (GR) reference chart in [Key Charts](#) on page 140.

Comments Section Walkthrough

COMMENTS

Provide any additional or updated information in the **COMMENTS** section. Examples could include updated addresses or phone numbers, new children to the household, and any other pertinent information. Comments must be initialed and dated by the recruiter.

Eligibility Data Certification Section Walkthrough

ELIGIBILITY DATA CERTIFICATION

I certify that based on the information provided to me, which in all relevant aspects is reflected above, I am satisfied that these children are migratory children as defined in 20 U.S.C. 6399 and implementing regulations, and thus eligible as such for MEP services. I hereby certify that, to the best of my knowledge, the information is true, reliable, and valid and I understand that any false statement provided herein that I have made is subject to fine or imprisonment pursuant to 18 U.S.C. 1001.

I certify that the children listed on this form still have eligibility in the district; the family has been contacted to confirm a new move was not made since their last interview; and the children on this form are still living in the district, attending school in the district, or the children are being served by the district with MEP funds.

(Interviewer Certification)

(Date)

(Designated SEA Reviewer Certification)

(Date)

For instructions on how to complete a COE Recert in the Web System, review the section on **COE RECERTS** in the [MIS2000 User Guide](http://education.alaska.gov/ESEA/TitleI-C) (education.alaska.gov/ESEA/TitleI-C).

Eligibility Data Certification Language

I certify that based on the information provided to me, which in all relevant aspects is reflected above, I am satisfied that these children are migratory children as defined in 20 U.S.C. 6399 and implementing regulations, and thus eligible as such for Title I-C program services. I hereby certify that, to the best of my knowledge, the information is true, reliable, and valid and I understand that any false statement provided herein that I have made is subject to fine or imprisonment pursuant to 18 U.S.C. 1001.

I certify that the children listed on this form still have eligibility in the district; the family has been contacted to confirm a new move was not made since their last interview; and the children on this form are still living in the district, attending school in the district, or the children are being served by the district with Title I-C funds.

Interviewer Certification

After completing the interview and entering all necessary information on the form, the **INTERVIEWER** should review the form for completeness and accuracy. Note: An electronic signature is generated for the interviewer when the recruiter or records manager completes the COE Recert in MIS2000.

Date

Record the date on which the COE Recert was completed and signed by the interviewer. Note: When COE Recerts are created in MIS2000, the system automatically records the date.

Designated SEA Reviewer Certification

At least one designated SEA reviewer must check each completed COE Recert to ensure that the written documentation is sufficient and accurate. Note: An electronic signature is generated for the designated SEA reviewer when they approve the COE Recert in MIS2000.

Note: It is possible for the records manager to complete both the interviewer and the designated SEA reviewer portions of the COE Recert. It is recommended, however, that two separate individuals complete each COE Recert to ensure accuracy of all data.

Date

Record the date on which the COE Recert was reviewed and signed by the designated SEA reviewer. Note: When COE Recerts are approved in MIS2000, the system automatically records the date.

Important Reminders About COE Recerts

COE Recert Corrections

- For hard copy COE Recerts, draw a single line through the incorrect information. The original text should still be readable. Use an ink other than the initial pen color to make it easy to distinguish from the original text. Do not use whiteout or correction tape.
- If additional information is added to a newly written COE Recert by the recruiter or records manager, the correct information should be initialed and dated by the person making the change.
- The source of the correct information should be indicated in the **COMMENTS** section.
- If there are changes required on a COE Recert that has been approved in MIS2000, notify DEED so that corrections can be made by DEED.

Additional Information

It may be helpful to fill out a draft of the COE Recert, or another form designed by the district, when collecting information from the parents. Once all the information is collected and the child appears to meet the criteria to recertify them on a COE Recert, transfer the information onto an official COE Recert in the Alaska Migrant Web System. Recruiters or records managers completing COE Recerts through the Web System are required to certify the information documented by checking an **INTERVIEWER CERTIFICATION** box. For directions on how to complete a COE Recert in the Alaska Migrant Web System (MIS2000), refer to the **COE RECERTS** section in the [MIS2000 User Guide](https://education.alaska.gov/ESEA/TitleI-C/) (education.alaska.gov/ESEA/TitleI-C).

The Records Manager

This section outlines the responsibilities of the Title I-C records manager, a key role in ensuring the accuracy, compliance, and integrity of the Title I-C program at the district level. The records manager oversees the identification and recruitment of migratory children, coordinates all Title I-C reporting requirements, provides local training to staff involved in identification and recruitment, and maintains the district's Title I-C files in accordance with records retention policies. Together, these responsibilities support consistent implementation of program requirements and ensure that essential data and documentation are properly maintained.

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General Responsibilities of the Records Manager

This guide provides an in-depth timeline of a records manager's responsibilities throughout the school year. DEED recommends that these procedures be followed as closely as possible by district Title I-C staff to ensure that all Title I-C files are accessible, organized, and updated. There are some unique needs and circumstances that may cause districts to modify their procedures; however, records managers should consult DEED before making changes. Records management and reporting procedures are intended to:

- provide systematic procedures for tracking COEs/COE Recerts through the ID&R process;
- simplify filing procedures, eliminate duplicate copies, and make file retrieval easier; and
- ensure that records are organized and maintained in compliance with State and Federal guidelines.

Records managers are responsible for ensuring that all forms, resource materials, reports, and lists are prepared for migratory child recruitment. Districts must keep all Title I-C files and related information in a central location. Most districts begin recruitment at the start of the school year and continue through the **November 15** deadline. Records managers are encouraged to recruit on a year-round basis as they become aware of new children or children with new migratory activity.

If records managers have questions, need assistance with file maintenance or with other job duties, they should contact DEED. **Refer to the [DEED Title I-C Program Contacts](#) section on page 184.** The responsibilities of the district records manager are listed below.

Attend Training

- Attend the annual fall training on identification and recruitment of migratory children and records managing.
- Review all training materials to better understand the necessary information needed to make eligibility determinations for the Title I-C program.
- Train new recruiters and other district staff about the Title I-C program.

Manage Recruitment Process

- Provide recruiters with the necessary materials: Certificates of Eligibility (COEs), COE Recerts, maps, etc.
- Set recruiter deadlines for interviews and COE/COE Recert completion.
- Obtain designated SEA reviewer signature on COEs.
- Review and enter complete and accurate COEs/COE Recerts into MIS2000.
- Review and validate recruiter COEs in MIS2000.
- Review and approve COE Recerts in MIS2000.
- Regularly submit entered COEs/COE Recerts in MIS2000 to DEED for approval.
- Work with the DEED Title I-C team to correct COEs/COE Recerts.
- Make sure every child on the Fall Recruitment Report has been contacted.
- Provide parents with their eligibility determinations and a signed copy of their completed COE.

Manage Title I-C Reports and Migratory Child Files

- Maintain COE/COE Recert records and all other Title I-C files following guidelines set forth in this guide. Refer to the [Records Retention](#) section on page 88.
- Ensure all required [Title I-C Reports](#) (page 97) are submitted by due dates to DEED.
 - The [Title I-C Important Dates](#) (education.alaska.gov/Media/Default/ESEA/Title%20I-C%20Important%20Dates.pdf) resource provides all key dates for the program.

Manage Identification & Recruitment of Migratory Children

Identification Methods

Federal regulations require that a satisfactory effort be made to identify all eligible migratory children. Every effort must be made to find and enroll every migratory child who lives in the district, regardless of when they arrive in the district, whether they enroll in school, or how long they stay.

It is not enough to enroll children that come to school. Special efforts need to be made to find and certify eligible children not in an Alaska public school including private school children, homeschool children, dropouts, infants, and preschoolers. Records managers often assist with migratory child identification. This section describes various identification and recruitment methods. Each district must have a written identification and recruitment plan on file.

Questionnaires

Within the school district, questionnaires given to parents as part of the annual school enrollment packet are a valuable tool for finding potentially eligible migratory children. Refer to page 166 for [sample questionnaires](#). Questionnaires can be brief, including a few questions concerning basic migratory child eligibility requirements. The Title I-C staff member will collect the questionnaires and determine which families should be contacted for an interview based on their answers.

This identification method can be very useful throughout the school year if the district continues to use the questionnaire for all new and transferring students.

The sample forms are included only as a guide; each district may want to develop its own questionnaire. It is important that the questions are worded carefully to avoid confusion and frustration for the parents. The DEED Title I-C team is always available for assistance.

District Outreach

- **Referrals** – Referrals from school officials are another valuable identification method. Teachers, counselors, and administrators should be provided with basic instructions concerning the eligibility requirements for the Title I-C program. If school officials believe a child might qualify for the Title I-C program, they can let Title I-C staff know. This referral can be done informally, or a referral form can be made available by the district's Title I-C program.
- **Newsletter** – Another way to bring attention to the Title I-C program is to include articles explaining the importance of the program in the school newsletter.
- **Information Booths** – Many districts find it effective to set up information booths at school events such as assemblies, start of school parent/student orientation meetings, parent-teacher conferences, literacy nights, etc.

Community Outreach

Districts are responsible for informing the community about their Title I-C program. Examples include:

- **Posters/Flyers** – Posters and/or flyers placed in prominent places and in areas of migratory work activity are used to notify the public of the Title I-C program. Many districts find harbors, post offices, grocery stores, laundromats, community halls, housing units, fish processors, and preschools to be locations that are useful for reaching families of migratory children.
- **Newspaper Articles, Radio Announcements, TV Advertisements** – Articles concerning the Title I-C program can be submitted to the local newspaper, radio, TV station.
- **Community Organizations** – Many community organizations can provide connections to families. Providing information to and communicating with social service agencies, tribal councils, employers, libraries, PTAs, employment centers, and other community organizations can facilitate referrals.
- **Word of Mouth** – Many families are referred through word of mouth by other families of migratory children.
- **Social Media** – Many families frequently turn to social media platforms to connect with districts, schools, and programs. Utilizing social media to advertise the program and connect to community members and families is a valuable tool for the Title I-C program. Social media posts might include information on recruitment, services, and family engagement activities.

Identification & Recruitment Materials

Each year, records managers must obtain and provide their recruiters with:

- copies of the COE (printed, electronic, web) for the current school year;
- copies of the COE Recert (printed, electronic, web) for the current school year;
- [Title I-C District Staff Manual](http://education.alaska.gov/ESEA/TitleI-C) (education.alaska.gov/ESEA/TitleI-C)
- [MIS2000 User Guide](http://education.alaska.gov/ESEA/TitleI-C) (education.alaska.gov/ESEA/TitleI-C)
- Fall Recruitment Report (FRR) (as needed); and
- other training materials and notes.

Training materials are updated annually and distributed at the annual training. They can also be downloaded from the [DEED Title I-C webpage](http://education.alaska.gov/ESEA/TitleI-C) (education.alaska.gov/ESEA/TitleI-C). Current manuals and materials should be stored with Title I-C files. All training materials from previous years should be discarded to avoid confusion.

Maps

Each district should have a map that outlines the area of its school district. The map needs to be more detailed than a map of the entire State. The school district maps must be:

- reviewed annually, and updated showing common migratory activity sites, distances, and school district boundaries;
- have a legend/scale for determining distance;
- available in the district's Title I-C office; and
- distributed to recruiters.

Districts are responsible for ensuring that all Title I-C staff understand the location of the school district boundaries and any important details (landmarks, water boundaries) that are required to indicate that a move was across school district boundaries, or that the move was 20 miles or more, one way, in a school district of more than 15,000 square miles.

Moves across district boundaries do not require a map attached to the official COE on file at the district and in MIS2000.

Moves within a district that is greater than 15,000 square miles always require a map to be attached to the official COE on file at the district and in MIS2000 to document that both the child's moves and the worker's moves were at least 20 miles or more, one way, to a temporary residence.

One map tool the districts may use is the [Alaska Schools & Education Map](http://dced.maps.arcgis.com) (dced.maps.arcgis.com). This map will show all of Alaska's public school district boundaries, as well as the communities & schools within them. Districts can use this resource to track routes, measure distances, and print custom maps. [Instructions](#) for using the Alaska Schools & Education Map can be found on page 144.

Important Lists and Reports

During recruiting, there are several lists and reports that the records manager will need to prepare and refer to during the recruiting process. Lists (Snap reports) pulled from MIS2000 that will be highly useful during recruitment include:

- **APPROVED COE RECERTS LIST**
- **APPROVED COEs LIST**
- **CERTIFIED & RECERTIFIED MIGRATORY CHILDREN LIST**
- **CHILDREN NEAR END OF ELIGIBILITY LIST**
- **ELIGIBLE CHILDREN WITHOUT AN ENROLLMENT LIST**
- **IN PROCESS COEs LIST**
- **PDFs OF APPROVED COEs**
- **RECENTLY EOE'D CHILDREN LIST**

Refer to the [MIS2000 User Guide](http://education.alaska.gov/ESEA/TitleI-C) (education.alaska.gov/ESEA/TitleI-C) for a detailed list and descriptions of these Snap reports. Descriptions of each available Snap report can also be found in the [Definitions](#) section of the **GLOSSARY** at the end of this manual on page 131

Additional Paperwork Preparation

The next step is to prepare the paperwork for recruiters. Recruiters will need to have:

- new blank COE and COE Recert forms and/or electronic COE and COE Recert forms with current school year;
- access to the web COE and COE Recert (as applicable);
- pre-printed COEs (copies of last year's COEs), if requested;

- copies of the parent questionnaires/surveys that indicate the family may have made a qualifying move, if applicable; and
- a list of children from the district's Fall Recruitment Report (FRR) that they must contact, **listed in order of priority**.

The blank hard copy and electronic COE and COE Recert must have the current school year printed on the top right corner. Use of a previous year's COE/COE Recert forms is not permitted.

Tracking Recruitment Progress

During the fall recruitment period, records managers should establish a regular schedule for receiving progress reports from recruiters regarding their contacts and interviews with families of migratory children. This is important because it allows the records manager to provide updates to DEED and assess whether the recruiting strategies need to be adjusted. Records managers are encouraged to contact DEED for assistance, as needed. Refer to the [DEED Title I-C Program Contacts](#) section on page 184 for emails and phone numbers.

Records managers should establish a procedure for regular communication with the district recruiters to ensure the district will meet the **November 15** recruiting deadline. The records manager should continue to keep regular communication with recruiters throughout the school year.

Each district will need to have a system for tracking the progress of migratory child recruitment. Effective processes include:

- setting recruitment deadlines;
- regular communication between recruiters and records managers;
- a uniform method of noting progress on recruitment paperwork;
- a system in place for collecting completed COEs and COE Recerts from recruiters; and
- an organized filing system.

Submitting COEs

Records managers should submit their COEs to DEED as early as possible. This allows the DEED Title I-C team to review the information and get back to the districts with questions, if necessary, before the **November 15** deadline.

On **November 15**, districts are required to:

- submit the completed Fall Recruitment report; and
- have entered and submitted all COEs for review and approval to DEED.

The COEs submitted to DEED and approved as eligible by the November 15 deadline establish the district's Federal child count for funding purposes.

For more information and instructions, refer to the **CREATE COEs AND SUBMIT TO RECORDS MANAGER FOR REVIEW** section in the [MIS2000 User Guide](http://education.alaska.gov/ESEA/TitleI-C) (education.alaska.gov/ESEA/TitleI-C).

Submitting COE Recerts

COE Recerts should be submitted to DEED as early as possible. This allows DEED to review the information and get back to the districts with questions, if necessary, before the **November 15** deadline.

COE Recerts should not be entered if the family made a new qualifying move and a COE is in process. A COE Recert should only be used to recertify an eligible migratory child after a recruiter has contacted the family to confirm a new move was not made since their last interview and the child is still either living in

the recruiter's district, attending school in the recruiter's district, or is being served by the recruiter's district with Title I-C funds.

The COE Recerts entered and approved by the November 15 deadline establish the district's Federal child count for funding purposes.

For more information and instructions, refer to the **CREATE COE RECERTS AND SUBMIT TO RECORDS MANAGER FOR REVIEW** section in the [MIS2000 User Guide](https://education.alaska.gov/ESEA/TitleI-C) (education.alaska.gov/ESEA/TitleI-C).

Eligibility Notification

Records managers are responsible for notifying families of their child's eligibility determination, including those not approved. Records managers need to provide families with a copy of their child's current school year COE. The COE copy sent to families can be a copy showing actual signatures, or the approved PDF version from MIS2000 with only typed signature information. Refer to page 171 for a [sample eligibility notification letter](#). If there are any questions about eligibility at the district level, the issue should be referred to the eligibility specialist at DEED for guidance. [DEED Title I-C Program Contacts](#) can be found on page 184.

Run the Snap report named **APPROVED COEs CHILDREN LIST** and use it to assist in determining which COEs have been approved. For more information on the **APPROVED COEs CHILDREN LIST** Snap report, refer to the [MIS2000 User Guide](https://education.alaska.gov/ESEA/TitleI-C) (education.alaska.gov/ESEA/TitleI-C).

Appeals Process

DEED makes the final eligibility determination on all COEs. If a district or a parent would like to appeal a decision from DEED, they may do so using the processes detailed below.

District Appeals Process

If a district would like to appeal the eligibility determination of a COE made by DEED, it may submit a written request (via email) to the DEED Title I-C team for a second review. DEED will conduct a team review of the COE and provide a written response to the district's records manager regarding eligibility determinations. If the district is still not satisfied with the decision, it may contact the Title I-C program manager directly. If the situation continues to be unresolved, the Title I-C program manager will contact the regional representative from OME to assist.

Parent Appeals Process

If parents would like to appeal the eligibility determination made by their district or DEED, they must first contact their district's records manager. The records manager will review the eligibility determination with the parent. If the parents are not satisfied with the response from the records manager, the parent may contact the [DEED Title I-C team](#) (page 184) directly. DEED will review the eligibility determination as a team and provide a written response to the parents. If the situation continues to be unresolved, the Title I-C program manager will contact the regional representative from OME to assist.

DEED Informal Review of Complaints

Alaska Regulation [4 AAC 06.888](https://akleg.gov/basis/aac.asp#4.06.888) (akleg.gov/basis/aac.asp#4.06.888) outlines the process for any person to file a complaint with the department alleging that the school district or the department has failed to comply with the requirements of the federal programs under the Elementary and Secondary Education Act, as amended by the Every Student Succeeds Act. The regulation outlines what must be included in the complaint and the timelines in which a review is conducted.

Data Quality Control

The Alaska Title I-C program has created quality control processes that ensure that only eligible migratory children are recruited for the Title I-C program and that all eligibility decisions are supported by appropriate documentation. These processes reflect the regulatory requirements of 34 CFR § 200.89.

All school districts that receive Title I-C funding from the Alaska Department of Education & Early Development must develop and follow a local quality control plan. The district quality control plan must describe how the district intends to follow Alaska's Title I-C quality control guidelines and procedures.

The Alaska Title I-C program's quality control goals are to:

1. identify and recruit all eligible migratory children and youth, including migratory children too young for school, preschool migratory children and migratory children who have dropped out of school, in Alaska;
2. ensure that proper migratory eligibility determinations are made by Title I-C program personnel; and
3. ensure that the districts and State maintain strong and accurate documentation.

Quality Control Procedures

Analysis and Accuracy of Title I-C Reports

Any discrepancies between reports generated by the district and DEED need to be reported to the DEED Title I-C team immediately. Refer to page 184 for the [DEED Title I-C Program Contacts](#).

Staff Training

Statewide Training

The identification and recruitment (ID&R) of eligible migratory children in Alaska is mission critical. Each year, approximately 14,500 children in Alaska, and their families, are identified and recruited for the Title I-C program by district personnel. It is a requirement of the Alaska Title I-C program to annually train and guide recruiters and records managers on how to identify and recruit migratory children, and how to make appropriate eligibility determinations. It is the Alaska Title I-C program's responsibility to make sure district personnel carry out quality control procedures designed to ensure accuracy of recruiters' and records managers' eligibility determinations and written eligibility documentation. This is accomplished through recruiter and records manager training.

Recruiters, records managers, designated SEA reviewers, and new Title I-C program coordinators are required to receive annual Title I-C program training on identification and recruitment. The Title I-C program's training for recruiters and records managers are currently conducted virtually. If training is conducted in person, districts may use Title I-C funds to cover travel costs for district personnel to attend in-person training. On an as-needed basis, webinars are hosted to any personnel who could not attend training.

Topics covered during DEED's statewide trainings include, but are not limited to: program overview, eligibility requirements, detailed walkthrough of the COE, interviewing, COE completion, FERPA, cyber security, [Alaska Migrant Web System](#) (ak.msedd.com) otherwise known as MIS2000, eligibility determination process, administering the program overview, recruiters and records managers duties, quality control requirements, and reporting requirements. Annual training materials on the identification and recruitment of migratory children, the Title I-C District Staff Manual, and the MIS2000 User Guide can be found on the [Title I-C webpage](#) (education.alaska.gov/ESEA/TitleI-C).

Local Training

All staff involved with the district's Title I-C program should be given local training regarding local procedures and issues. The district should ensure that new manuals and training materials are given to all Title I-C staff. Local Title I-C training should include all people involved with migratory child identification, recruitment, and eligibility certification. Depending on the district, this may include:

- Recruiters
- Records Managers
- Data Entry Specialists
- Title I-C Program Coordinators
- Designated SEA Reviewers
- Superintendents
- Principals
- Federal Programs Coordinators
- Teachers
- Counselors
- Registrars
- Paraprofessionals

District Title I-C Staff Communication and Coordination

There should be effective workflow and communication between Title I-C staff members. The roles and responsibilities of each staff member should be understood by everyone in the program. Communication and coordination steps should include:

- All Title I-C staff should understand the district's Title I-C program including the program structure, purpose, requirements, services offered, and families served.
- Title I-C staff should know their individual job requirements and understand how they fit into the workflow of the program.
- The lines of communication within the district, with DEED, or with other districts should be clear.
- The district staff structure should be such that the workflow ensures the district's program meets all requirements for State and Federal Title I-C statutes and regulations.

Accuracy of Eligibility Determinations

The Alaska Title I-C program has several layers of review prior to a child being approved as eligible for the program. Every Certificate of Eligibility (COE) and COE Recertification (COE Recert) must be quality reviewed by the recruiter, records manager, and designated SEA reviewer. By signing a COE or COE Recert, each district staff member ensures that the COE or COE Recert is complete, filled out correctly, and that the information meets the Title I-C program eligibility requirements. Recruiters and records managers do not determine final eligibility.

After the COE or COE Recert data is entered into MIS2000 and uploaded, DEED reviews the information to ensure that it meets all eligibility requirements. DEED makes the final eligibility determination on all COEs and COE Recerts. For more information on the [appeals process](#), refer to page 83. Children new to the Title I-C program are not eligible for services until the COE is approved by DEED.

- Each COE is reviewed by qualified and trained records managers at each district. Training occurs each fall and additional training can be provided on a case-by-case basis, if necessary.
- DEED reviews each COE. If corrections are needed or information is unclear, the COE is sent back to the district for revision. It is reviewed again by DEED once it is returned.
- If needed, the eligibility specialist will bring COE questions to the ID&R specialist and/or data specialist at DEED. If questions still exist regarding child eligibility, the COE will go to a team meeting for team review. Team meetings are held weekly.
- If there are questions or doubts regarding eligibility, contact [DEED](#) (page 184).
- Children are not eligible for services in the Title I-C program until the COE is approved by DEED.

Quality Control and Identification & Recruitment (ID&R) Plans

Quality Control Plan

Quality control is a vital part of a successful Title I-C program. All districts with Title I-C program should follow basic quality control procedures. A quality control process must be established through a written quality control plan. The quality control plan protects the integrity and accuracy of identification and recruitment policies and procedures. It also ensures that all potential migratory children are identified and recruited, only eligible children are certified as eligible, and policies are in place to ensure migratory children files and data are accurate.

Each district must have a written quality control plan on file. It is a document that establishes a quality control process for ensuring the integrity and accuracy of the identification and recruitment policies and procedures of a district-level Title I-C program. This includes:

- evaluating the recruitment practices of individual recruiters;
- maintaining accurate migratory child data records in MIS2000 with all required data elements;
- resolving data discrepancies;
- sending and receiving migratory child records;
- validating and verifying all information on COEs and migratory child records;
- entering information into MIS2000 in a timely manner; and
- validating and verifying all information reported to DEED.

DEED reviews districts' quality control plans during monitoring and technical assistance visits. Districts are encouraged utilize the [District Level Guiding Documents Template](http://education.alaska.gov/ESEA/TitleI-C/docs/District%20Level%20Guiding%20Documents%20Template.docx) (education.alaska.gov/ESEA/TitleI-C/docs/District%20Level%20Guiding%20Documents%20Template.docx).

Refer to the [Sample Recruiter Observation Skills Form](#) on page 182 for an example form to evaluate the recruitment practices of individual recruiters.

ID&R Plan

In Alaska, identification and recruitment (ID&R) consists of a well-conceived and well-coordinated process to ensure that the State is making timely and accurate eligibility determinations. **Each district must have a written ID&R Plan on file.** The purpose of an ID&R Plan is to ensure efficient identification and recruitment of migratory children within a district-level Title I-C program.

Important roles within ID&R are the recruiter and the records manager. Coordination between these two positions is crucial for a successful ID&R process. In districts in Alaska, there may be one or more people in each position, depending on the size of the district. The two positions work closely during fall recruitment and collaborate on identification tasks and COE reviews. The recruiter works directly with families and the community. The records manager usually works with records, reports, and the Title I-C database. The duties are divided between the two positions as follows:

- **Recruiter** – responsible for identification, recruitment, and COE completions.
- **Records manager** – responsible to review and verify COEs and submit them through MIS2000 to DEED, conduct enrollment and withdrawal activities, generate Title I-C lists and reports, and maintain the student records files.

DEED reviews districts' ID&R plans during monitoring and technical assistance visits. Districts are encouraged utilize the [District Level Guiding Documents Template](http://education.alaska.gov/ESEA/TitleI-C/docs/District%20Level%20Guiding%20Documents%20Template.docx) (education.alaska.gov/ESEA/TitleI-C/docs/District%20Level%20Guiding%20Documents%20Template.docx).

Prospective Re-Interviewing

The United States Department of Education's Office of Migrant Education (OME) requires each State to conduct an annual review of the program's eligibility determinations. Re-interviewing may alert DEED to misunderstandings of the eligibility requirements at the district level. It may also help to find clerical or computer errors. The prospective re-interviews are conducted by trained and qualified personnel who are independent of the original interviews. The prospective re-interviews may be conducted either in-person or by telephone.

Interviewees are selected from a random child list generated by MIS2000. Interviews are conducted using a standard eligibility interview form. Following the interview, the answers from the form are compared to the COE. If the information contradicts the information on the COE or indicates that the family is not eligible for the Title I-C program, DEED will bring the COE and issues raised during the re-interview to the attention of the records manager. The records manager will then have an opportunity to provide additional information such as notes from the recruiter, further information regarding the family's migratory moves, as well as other pertinent information. DEED will work with district staff until all questions and data integrity issues are resolved. An interviewee signature on a COE certifies that a parent is willing to talk to a representative of the Title I-C program, should they be contacted.

COE Quality Control Review

Each year, at the conclusion of the major fall recruitment push, DEED conducts a COE quality control review. Districts not being monitored or receiving a technical assistance visit by DEED will have a random sample of COEs reviewed. The sample size is based on the migratory population size of the district and risk factors. DEED pulls a sample of students approved in the current recruiting season. If inconsistencies are found between the hard copies and the data in MIS2000, DEED alerts the district's records manager, and the records manager then addresses the issues with the recruiters. This quality control process ensures accurate data at both the district and DEED.

Technical Assistance (TA) Visits

DEED conducts technical assistance visits with districts in conjunction with the ESEA Consolidated Monitoring visits. Each school year, DEED conducts technical assistance visits with Title I-C staff of selected school districts chosen for ESEA Monitoring. These technical assistance visits will be conducted virtually, or onsite at the district. During these visits, a staff member from DEED will conduct a thorough review of the district's identification and recruitment procedures, quality control procedures, Title I-C files, and compliance with eligibility requirements.

Technical Assistance Eligibility Verification from DEED – This process involves calling a small percentage (10% of a district's migratory population with a maximum of 20), drawn at random, of families of migratory children within that district to verify that the information on the COE is accurate. This is done prior to the technical assistance visit. Technical assistance eligibility verification will also be used to verify that original COEs in district files match what is in MIS2000.

Technical Assistance Form – An interview based on the technical assistance form will be conducted. DEED will ask the records manager a series of questions about the district's identification and recruitment procedures, review the district's COE and COE Recert files, and review supporting files. This helps guide the visit, noting any areas of strength or where improvements could be made.

Training – The technical assistance visit also provides a retraining or extended training opportunity for Title I-C staff. During the on-site visit, a staff member from DEED will devote time to answering questions, assisting records managers with MIS2000 entry and reports, developing, and improving recruitment procedures, and responding to any other specific requests.

Records Retention

This section pertains to Title I-C ID&R and reporting retention requirements. Regarding all other Title I-C related records, in general, records tied to a federal award need to be kept for about five years. The Uniform Grant Guidance requires that records be retained for three years after the final expenditure report is submitted. And since districts typically have 27 months to spend those funds, the full retention period ends up being closer to five years.

Records managers are responsible for ongoing recruitment of new children, providing migratory child eligibility information to school district staff, and maintaining Title I-C files. It is the job of the records manager to ensure that COE and COE Recert files are kept in an orderly fashion. The following section describes recommended Title I-C ID&R and reporting file organization. Files may be stored physically or electronically, and this section will cover both hard-copy and electronic records retention.

As of the 2021-2022 school year, the MIS2000 database stores all new COEs and COE Recerts, so retention of these documents at the district level will not be required. Previous year COEs and COE Recerts must still be retained for their entire retention periods. Signed hardcopy COEs submitted for approval to DEED should be kept in district files until the COE has been approved by DEED.

Definition of a “Record”

Per AS 40.21.150(6), a record is defined as “any document, paper, book, letter, drawing, map, plat, photo, photographic file, motion picture film, microfilm, microphotograph, exhibit, magnetic or paper tape, punched card, electronic record, or other document of any other material, regardless of physical form or characteristic, developed or received under law or in connection with the transaction of official business and preserved or appropriate for preservation by an agency or a political subdivision, as evidence of the organization, function, policies, decisions, procedures, operations, or other activities.” In other words, school districts may store records in any format as long as the record remains readable and accessible for its retention period.

Additionally, the Uniform Guidance (2 CFR §200.335) states that when original records are paper, electronic versions may be substituted through the use of duplication or other forms of electronic media if they are subject to periodic quality control reviews, provide reasonable safeguards against alteration, and remain readable. Therefore, the district may choose to scan copies of their migratory child eligibility records (e.g., Certificate of Eligibility, Certificate of Eligibility Recertification (COE Recert)) and store them electronically. Refer to the [Destroying Old Records](#) section (page 96) for more information on the required retention period of migratory child eligibility forms.

All records should be stored securely so that only individuals with a business need can access them.

Types of Records

There are a variety of records that districts will need to retain. Below is a list of Title I-C record types that districts will likely keep on file, as well as recommended naming conventions to help with the organization of these records.

Certificate of Eligibility (COE) Filing

The COE is the most important document in the Title I-C files; it is the basis for each child’s migratory eligibility. The original signed COE must be kept by the district office for **ten school years**. COEs created prior to the 2021-2022 school year must be kept on file at the district until the COE has reached the end of its retention period. COEs created in school year 2021-2022 and after will be stored by the MIS2000 database, so these COEs are not required to be retained at the district level once they have been approved by DEED.

COE Recertification (COE Recert) Filing

COE Recerts (previously known as Annual Recertification of No New Moves or ARCs) created prior to the 2021-2022 school year must be filed with the most recent eligible COE until the COE Recert has reached the end of its retention period (**ten school years**). COE Recerts created during school year 2021-2022 and after are stored by the MIS2000 database and are not required to be printed and filed with the original COE. Refer to [MIS2000 Retention of COEs and COE Recerts](#) on page 95.

Active Files

These are COEs and COE Recerts for families with at least one currently eligible migratory child. The COEs and COE Recerts have been reviewed and approved by DEED. They should be organized into family bundles and kept in the **ACTIVE** file, as long as at least one child listed on the COE and COE Recert remains eligible in the program. Active files for COEs and COE Recerts must be retained for **ten school years**.

Pending Files

These are COEs and COE Recerts that have not yet been approved by DEED. Pending files should be retained by the district until the COE or COE Recert has been approved or cancelled by DEED and then can be securely disposed of once a final determination has been made by DEED. Depending upon the number of COEs and COE Recerts a district has, the records manager may want to file these in categories, as follows:

- District Review – Completed COEs and COE Recerts that need the signature of the designated SEA reviewer.
- Questions – COEs with specific eligibility concerns that require review or approval from DEED.
- To Be Entered – COEs and COE Recerts that have been approved at the district level but have not been entered into MIS2000.
- Uploaded – COEs and COE Recerts that have been entered into MIS2000 and uploaded for DEED review. Hold COEs in this file until they have been reviewed by DEED.
- Corrections and Clarification – COEs and COE Recerts that have been reviewed by DEED, but more information or corrections are required from the district to determine eligibility. The corrections must be entered into MIS2000 and uploaded to DEED for another review once that information is provided.

Inactive Files

These are COEs and COE Recerts for families of migratory children who are not currently eligible but could become eligible in the future. For a COE or COE Recert to be categorized as inactive, every child listed on the COE or COE Recert must be in **INACTIVE** status. Some possible reasons why COEs and COE Recerts may become inactive: all children on the COE or COE Recert move out of the district, their eligibility ends or parents/guardians withdraw children from the program. If any child could become eligible again, the family bundle is kept in this file. COEs or COE Recerts that become inactive should be retained for the entire duration of **ten school years**.

Gone Forever File

These are COEs and COE Recerts for migratory children who cannot become eligible again, because they graduated from high school, aged out (turned 20 years old or 22 if an active IEP is on file), or are deceased. A family bundle can only be placed in this file if every child listed on the COE is in **GONE FOREVER** status. Many districts combine the **GONE FOREVER** files with the **INACTIVE** files. **Note:** COEs must be kept on file until they have met the duration of their retention period (**ten school years**) even if filed under the **GONE FOREVER** section.

Canceled COEs

COEs for children who did not qualify for the program because they did not meet all the eligibility requirements. Districts should retain such COEs until the end of the school year before they are securely shredded.

Other ID&R Related Files

- **Documentation on Termed out Children** – This could include correspondence with families of migratory children, or district documentation on the termination of eligibility for a child.
- **Other Paperwork** – Any other documentation provided to DEED for eligibility verification.
- **Map of School District** – Every district is required to maintain a school district map showing district boundaries and work locations such as fish camps, rivers, etc. Maps must have a scale. One map tool districts may use is the [Alaska Schools & Education Map](http://dced.maps.arcgis.com) (dced.maps.arcgis.com). This map will show all of Alaska's public school district boundaries, as well as the communities & schools within them. Districts can use this resource to track routes, measure distances, and print custom maps. [Instructions](#) for the [Alaska Schools & Education Map](http://dced.maps.arcgis.com) can be found on page 144. Maps may be shredded when no longer needed.

Note: Interview notes, or other ID&R related documentation that are not COEs or COE Recerts, can be securely destroyed when no longer needed or once mandatory retention time has been met.

Correspondence

This includes printed letters, e-mail messages, or other important information sent by DEED or U.S. Office of Migrant Education (OME) regarding the Title I-C program in general. It may include guidance, deadlines, trainings schedules, or correspondence sent by the records manager to DEED.

MIS2000 Migratory Child Lists

There are several useful lists of migratory children and youth that can be kept filed with the Title I-C records; however, once a district no longer has need of a Snap report printed from MIS2000, it can choose to securely destroy them. For descriptions and purpose of each Snap report listed below, refer to the **SNAP REPORTS AVAILABLE TO DISTRICTS** section in the [MIS2000 User Guide](http://education.alaska.gov/ESEA/TitleI-C) (education.alaska.gov/ESEA/TitleI-C).

- Approved COE Recerts List
- Approved COEs List
- Certified & Recertified Migratory Children List
- Children Near End of Eligibility List
- Eligible Children Without an Enrollment List
- In Process COEs List
- Migrant Lunch List
- MIS2000 School Names List
- PDFs of Approved COEs
- Priority for Service (PFS) Children List
- Recently EOE'd Children List
- DEED Provided Lists (Missing Eligible)

Title I-C Reports

Districts are required to submit several reports throughout the year. These should be kept with the district's Title I-C files. These reports must be kept for **five school years**, after which they can be securely destroyed. For more information on each report, refer to the [Title I-C Reports](#) section on page 97.

- Priority for Services (PFS) K-2 Report
- Summer Services Report (SSR)
- Fall Recruitment Report (FRR)
- Course History (CH) Reports: First Semester (Fall), Second Semester (Spring), and Summer Term
- Fidelity of Strategy Implementation (FSI) Report
- Mass Withdrawal (MW) Report
- Title I-C Literacy Grant Final Report

Physical Records Maintenance

This section will provide guidance for districts wishing to continue storing physical copies of Title I-C records. Physical records should be kept in a secure, locked location to prevent unauthorized access to student data.

COE/COE Recert Filing

The COE is the most important document in the Title I-C files; it is the basis for each child's migratory eligibility. The information on the COE is sent to DEED through MIS2000 where it is entered and uploaded. Instructions on creating COEs in the [Alaska Migrant Web System](#) (ak.msedd.com) can be found in the [MIS2000 User Guide](#) (education.alaska.gov/ESEA/TitleI-C).

COE Recerts created prior to 2021-2022 should be filed with the original corresponding COE in family bundles. Information on the COE Recert is sent to DEED through MIS2000 where it is entered and submitted. Instructions on entering COE Recerts into the [Alaska Migrant Web System](#) (ak.msedd.com) can be found in the [MIS2000 User Guide](#) (education.alaska.gov/ESEA/TitleI-C). COE Recerts created in school year 2021-2022 and after are stored by the MIS2000 database and are not required to be printed or kept in physical files.

Both COEs and COE Recerts must be retained for **ten school years**. Refer to the [MIS2000 Retention of COEs and COE Recerts](#) section on page 95.

For districts storing paper copies of COEs & COE Recerts, it is recommended that districts file their COEs according to the following specifications:

- When filing COEs & COE Recerts, they should be grouped into family bundles by family last name. COE Recerts should be kept with the most recent COE.
- The family name is determined by the last name of the first child listed on the COE/COE Recert, who is the youngest qualifying child in the family.
- Within the family bundle, COEs/COE Recerts should be in descending chronological order, with the most recent COE in the front of the family bundle.
- After eligibility has been confirmed, all COEs/COE Recerts should be attached to the front of the appropriate family bundle.
- The family bundle must be filed according to the most recently approved COE/COE Recert.
- Due to blended families and other circumstances, the family last name may change from year to year.
- Remember that COEs and COE Recerts must be kept for **ten school years** before being destroyed.

Electronic Records Retention

Districts can store their Title I-C records electronically.

Per AS 40.21.150(6), a record is defined as “any document, paper, book, letter, drawing, map, plat, photo, photographic file, motion picture film, microfilm, microphotograph, exhibit, magnetic or paper tape, punched card, electronic record, or other document of any other material, regardless of physical form or characteristic, developed or received under law or in connection with the transaction of official business and preserved or appropriate for preservation by an agency or a political subdivision, as evidence of the organization, function, policies, decisions, procedures, operations, or other activities.” In other words, school districts may store records in any format as long as the record remains readable and accessible for its retention period.

Additionally, the Uniform Guidance (2 CFR §200.335) states that when original records are paper, electronic versions may be substituted through the use of duplication or other forms of electronic media if they are subject to periodic quality control reviews, provide reasonable safeguards against alteration, and remain readable. Therefore, the district may choose to scan copies of their migratory eligibility records (e.g., Certificate of Eligibility, Certificate of Eligibility Recertification (COE Recert)) and store them electronically. Refer to the [Destroying Old Records](#) section (page 96) for more information on the required retention period of migratory child eligibility forms.

General Electronic Records Guidance

Electronic records must be reliably and securely maintained:

- Electronic records should be maintained in their electronic form, because preserving the context and structure of records and facilitating access to them are best accomplished in the electronic environment.
- Records created and maintained within reliable electronic recordkeeping systems should serve, in most cases, as the official record copy.

Electronic records must be preserved without loss of any vital information for as long as required by law and policy:

- The future usability of electronic records must be ensured through the development of migration or conversion strategies designed to update hardware, software, and storage media.
- Electronic records must include or be linked to the essential metadata describing content and structure of the business record and the context of its creation.

Electronic records must be accessible and retrievable in a timely manner throughout their retention period:

- Electronic records must be easily accessible in the normal course of business.
- Electronic records must be searchable and retrievable for reference and secondary uses including audits, legal proceedings, and historical research.

Access to electronic records must be controlled according to well-defined criteria. Recordkeeping systems must ensure that electronic records are protected from unauthorized access:

- School districts must take measures to prevent unauthorized access to private and confidential electronic records by identifying records that are subject to restrictions.
- Records must be accessed to the minimum amount necessary to perform a business activity or function.
- Records should be stored securely on the school district drives and not on personal computers.

Maintenance and Long-term Preservation of Electronic Records

To ensure that electronic records are readable for future use a proactive maintenance plan must be implemented. The maintenance plan would involve migrating records when operating systems and/or software applications are changed or upgraded. It is best practice to create a documentation trail when files are migrated from one system to another, and this documented trail file should include: systems and software specifications, date of migration, name, and job title of person responsible for migration, and description of any loss of information that may occur during the migration process. Electronic records are best maintained in a managed environment that includes regular system back-ups and a disaster recovery plan.

The National Archives publishes a list of [preferred formats for electronic records](https://www.archives.gov/records-mgmt/policy/transfer-guidance-tables.html) (archives.gov/records-mgmt/policy/transfer-guidance-tables.html).

Title I-C Electronic Records Retention

If a district chooses to begin maintaining their Title I-C records electronically, they must follow the [General Electronic Records Guidance](#) outlined on page 92. This section provides additional expectations for maintaining electronic migratory child eligibility records.

Districts must have the final approved version of any COE/COE Recert securely saved in their electronic filing structure. These forms must match what is approved in MIS2000.

The COE/COE Recert must be easily readable. Poor quality scan/faxes are not acceptable.

For each COE that requires a map to be attached, it is best practice to save the map and the COE as a single file to avoid them being separated. Even if a family moves to the same place each year, a map must be attached to each COE. Districts may also refer to the [Possible Electronic File Structures and Naming Conventions](#) section beginning page 94.

The filing structure and naming conventions must be consistent and easily understandable. Districts are not required to go back in time and save the previous year's migratory child eligibility records electronically. They can continue to maintain the paper files until the end of their retention period. However, if a district chooses to migrate the previous year's migratory child eligibility forms to their electronic records, each migratory child eligibility form (with applicable required attachments) must be saved as individual files. It is not acceptable to scan all migratory child eligibility forms into one document; this would not meet the requirements of being easily accessible and retrievable.

Districts must work with their IT department to ensure that the electronic records are maintained in a managed environment that includes regular system back-ups and a disaster recovery plan and to implement measures to prevent unauthorized access to the confidential migratory child eligibility forms.

Plans must be in place around migrating records when operating systems and/or software applications are changed or upgraded. It is imperative that the district avoids file format obsolescence. There should also be a plan regarding migrating records from one format to another to ensure continued access using new technologies. Districts should avoid media and hardware/software obsolescence (i.e., floppy disks).

Written Plan

Districts choosing to save migratory child eligibility forms electronically must have clear written procedures that describe how the records are:

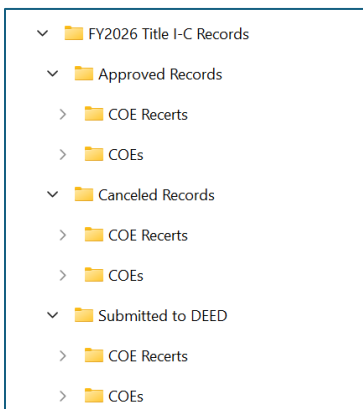
- reliably and securely maintained;
- preserved for future readability;
- accessible and retrievable in a timely manner;
- protected from unauthorized access;
- kept for the entirety of their required retention period; and
- where the electronic records are stored.

Refer to the [Electronic Records Retention](#) (page 92) section for more information regarding the requirements for electronic records.

Possible Electronic File Structures and Naming Conventions

Example of File Structure

In general, DEED strongly encourages districts to create folders for each fiscal year. Within the fiscal year, there would be folders for approved, submitted to DEED, and canceled records. This would allow records managers to keep track of the records while they are in process for approval. Districts must keep approved records separate from those in process and canceled. As COEs and COE Recerts are moved through the process, the records managers would move the COEs and COE Recerts from the “Submitted to DEED” file to the appropriate “Approved” file. Below is a screen shot of what one year’s filing structure could look like. This could also simplify the destruction of files that have met their retention requirements.



Possible COE/COE Recert Naming Conventions

DEED does not have a mandatory naming convention. However, it is expected that the district is consistent in their naming convention and that the naming enables individuals to efficiently find specific COEs and COE Recerts. Below are two examples of naming conventions districts could use.

Option 1

Save the COEs by the COE ID # (generated from the Alaska Migrant Web System plus the last name of child(ren) on the COE, e.g., COE-AK0-26-123123 Smith.

Save the COE Recerts by the COE Recert ID # (generated by the Alaska Migrant Web System) of the COE that it recertified plus the last name of child(ren) on the COE, e.g., COERecert-AK0-23-120120 Smith.

Examples:

- The approved 2026-2027 COE for the Anderson family is COE ID# of AK0-26-15595. The electronic record name would then be: “COE-AK0-26-654321 Anderson”

- The approved 2026-2027 COE Recert for the White/Kendall family who recertified their 2025-2026 COE (COE ID# AK0-25-99999). The electronic record name would then be: “COERecert-AK0-25-99999 WhiteKendall”

Option 2

Save the COEs and COE Recerts by the last name, then the first names of the children.

Examples:

- An approved 2026-2027 COE for the Anderson family that has two children named Alicia Anderson and Matthew Anderson on it could be saved as: “COE-AK0-26-654321 AndersonAliciaMatthew”
- An approved 2026-2027 COE Recert for the White/Kendall family that has three children named Tom White, Jessica Kendall, and Levon Kendall on it could be saved as: “COERecert-AK0-25-99999 WhiteKendalTomJessicaLevon”

MIS2000 Retention of COEs and COE Recerts

Beginning in school year 2021-2022, districts are no longer required to retain COEs and COE Recerts created in 2021-2022 and later. **All COEs and COE Recerts prior to 2021-2022 must continue to be retained at the district for their required retention period (10 school years).** Due to the changes to signature collection for COEs and COE Recerts, all COEs and COE Recerts (beginning 2021-2022 school year) will be stored by the MIS2000 database. COE Recerts now include electronic assurances that take the place of ink signatures. COEs can be signed electronically within the MIS2000 database. For COEs that cannot be completely signed electronically in the [Alaska Migrant Web System](http://ak.msedd.com) (ak.msedd.com), quality control checks require that those COEs are scanned and uploaded into the database this will include any COEs with one or more ink signatures, and any COEs with one or more electronic signatures obtained outside of the Web System. Move maps must also be uploaded into the database, where appropriate. These changes mean that the MIS2000 database now houses all relevant data related to records retention for these documents, and that districts are no longer required to retain/maintain these documents moving forward. All COEs and COE Recerts prior to 2021-2022 must be retained securely at the district for the required ten years.

Districts are strongly encouraged to abide by the following guidelines regarding this change in retention of COE Recerts and COEs:

- Securely store all new COEs (and move maps, if applicable) containing one or more signatures obtained outside of the Web System (ink or electronic) until approved by DEED.
- Securely store all new COEs (and move maps, if applicable) until the end of the school year.
- When uploading COEs with signatures obtained outside of the Web System (ink or electronic) and/or move maps to the Web System, please use the following file naming conventions:
 - **COEs:** COE ID # followed by the last name(s) of the children included (Example: COE-AK0-26-123456 SmithAnna COE)
 - **Move Maps:** COE ID #, followed by the last name(s) of the children included, followed by the word “Map” (Example: COE-AK0-26-123456 SmithAnna Map)

Please note that COEs and COE Recerts prior to 2021-2022 must still be maintained by districts for the entirety of their retention period (10 years). Title I-C reports completed by the district are not affected by these changes and must also be retained for their required retention period (5 years).

Destroying Old Records

COEs/COE Recerts are kept for a total of 10 years. Districts should only have COEs and migratory child paperwork dating back to the 2017-2018 school year in their files. Older COEs/COE Recerts should be shredded, even if the family still has active children in the program. COEs/COE Recerts from 2016-2017 and all prior years must be securely shredded.

Example: A COE that indicates that a child made a qualifying move in October 2016 means that the child will remain eligible, without another qualifying move, until October 2019. A child eligible in October 2019 would be included in the Federal child count for the period 09/01/2019-08/31/2020 and would generate Federal FY21 (State FY22) funding for Alaska. Federal FY21 (State FY22) funds may be used until September 30, 2023. DEED does not need to submit the final expenditure report for these funds to USED until December 31, 2023. *The three-year record retention period begins in December 2023 when DEED submits the final expenditure report and runs until December 31, 2026. Therefore, the district would have to keep the COE until December 31, 2026.*

Reports can be shredded/destroyed after **five years** and printed MIS2000 lists (Snap reports) can be shredded as the district no longer has need of them. All Title I-C records (including COEs, COE Recerts, Title I-C reports, migratory child lists, correspondence, and other notes) should be reviewed, and old files shredded annually.

All Title I-C records should be reviewed annually, and any files that have met their required retention times should be discarded appropriately. Districts are required to have written policies and procedures which include the process for maintaining, storing, and securely destroying files once the required retention time has been met.

COE/COE Recert Retention

School Year	Retention Requirement
2026-2027 (Current)	Keep (MIS2000 Retains)
2025-2026	Keep (MIS2000 Retains)
2024-2025	Keep (MIS2000 Retains)
2023-2024	Keep (MIS2000 Retains)
2022-2023	Keep (MIS2000 Retains)
2021-2022	Keep (MIS2000 Retains)
2020-2021	Keep (District Retains)
2019-2020	Keep (District Retains)
2018-2019	Keep (District Retains)
2017-2018	Keep (District Retains)
2016-2017	District Securely Destroy

Title I-C Reports Retention

School Year	Retention Requirement
2026-2027 (Current)	Keep (District Retains)
2025-2026	Keep (District Retains)
2024-2025	Keep (District Retains)
2023-2024	Keep (District Retains)
2022-2023	Keep (District Retains)
2021-2022	District Securely Destroy

Title I-C Reporting

States are required to collect and report minimum data elements (MDEs) to the U.S. Department of Education Office of Migrant Education (OME). MDEs are data elements that States must collect and maintain in their migratory child databases (i.e., MIS2000) for each of their eligible migratory children to make the data available to other States via the national migratory child database, MSIX.

Alaska collects the federally required MDEs for each migratory child through COEs, COE Recerts, statewide data collections, and the various Title I-C reports listed below. If the district has questions regarding Title I-C reports, contact the data specialist at DEED. For [DEED Title I-C Program Contacts](#), refer to page 184.

Reports are exchanged between DEED and district staff utilizing the [Alaska Migrant Web System](#) (ak.msedd.com). This is done to protect Title I-C data and child privacy. For more information, refer to the [MIS2000 User Guide](#) (education.alaska.gov/ESEA/TitleI-C).

Report	Due Date	Page
Summer Services Report	September 30	98
Course History Report (Summer Term)	September 30	99
Priority for Services K-2 Report	October 15	100
Fidelity of Strategy Implementation (FSI) Tool	November 5	101
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Course History Report (1st Semester)	January 31	99
Title I-C Literacy Grant Final Report	June 15	103
Mass Withdrawal Report	June 15	104
Course History Report (2nd Semester)	June 30	99

Summer Services Report (SSR)

Due: September 30

This report is for districts that run a Title I-C funded summer program or provide Title I-C funded supplemental services to eligible migratory children over the summer term. All districts receive the Summer Services Report (SSR). Records managers then report on the supplemental program services migratory children received during the summer term on the Summer Services report.

This report should be completed for any Title I-C funded summer services provided to migratory children regardless of whether it crosses the fiscal year. Services migratory children received during the summer should be reported in the Summer Services report, not the Mass Withdrawal report.

- **2026 Summer** (Between 2025-2026 and 2026-2027 school years) report due **September 30, 2026**
- **2027 Summer** (Between 2026-2027 and 2027-2028 school years) report due **September 30, 2027**

Information collected on the Summer Services report for children that received Title I-C funded services during the summer:

Data Element	Description
Title I-C Services Start Date	Enter the first day the child received Title I-C funded services during the summer term.
Title I-C Services End Date	Enter the last day the child received Title I-C funded services during the summer term.
Term Type	List any term code (the reason a migratory child exited the Title I-C program before the end of their eligibility), if applicable. Refer to page 140 for a complete list of term codes .
Term Date	Provide the date the student "termed out," if the term code was provided. Make sure to list all graduates and their graduation dates (term date).
SP Codes	Enter SP codes provided to each child. A full list of SP Codes starts on page 179. SP codes need to be separated by a comma and a space. SP codes do not need to be listed alphabetically.
COS Provision	Enter which continuation of services provision that was used to provide services after a child's eligibility ends. See page 115 for more information on continuation of services .
COS SP Codes	List any SPs that the child received during the summer term after their EOE Date. A full list of SP Codes starts on page 179. SP codes need to be separated by a comma and a space. SP codes do not need to be listed alphabetically.
IEP over 20	Use this field to verify if any child that turns 20 prior to the end of the summer term and has an active IEP on file with the district. If the district has an active IEP on file for the child, they should indicate Y for Yes in the column. If there is no active IEP on file for the child, a comment should be made in the COMMENTS section, and the field should remain blank. This field is only applicable to children that turn 20 prior to or during the school year or term as applicable.
Comments	Provide any other information DEED should know about each student (e.g., name change, AKSID update, term code information).

[Sample Title I-C Reports](#) can be found starting on page 175.

Course History (CH) Reports

Due: January 31 (Fall Semester), June 30 (Spring Semester), and September 30 (Summer Term)

Each district is required to report course history on all currently eligible migratory children, grades 9-12. This data is collected and reported to DEED three times a year. Districts will receive the Course History report three times a year (mid-December, early May, and early Fall), which will include all eligible migratory children for the current school year, grades 9-12. The deadline for submission of the Course History report to DEED are three times a year, on **January 31** (semester one), **June 30** (semester two) and **September 30** (Summer Term).

Information collected on the Course History (CH) reports:

Data Element	Description
Subject	Subject options include: Career and Tech Ed, Fine Arts, Health, Language Arts, Math, Other, Performing Arts, Physical Education, Science, Social Sciences, Social Studies, World Languages.
Course Title	Provide name of the course the student is taking/has taken.
Course Type	Course Type options include: Regular, Honors, Pre-Advanced, Advanced Placement, International Baccalaureate, Dual Enrollment, Other, Not Applicable.
Course Section	Course Section options include: Full Yr (01), Section A (02), Section B (03)
Term Type Code	Term Type options include: Full School Year, Semester, Trimester, Quarter, Summer, Other.
Clock Hours	This field is applicable if the course was not completed. Provide the number of clock hours the student has completed to date. Must also complete Grade to Date. If this field is completed, do not complete Credits Granted or Final Subject Grade fields.
Grade to Date	This field is required only if the course was not completed. Provide a percentage grade, rounded to the nearest whole number, that the student has completed on the course at the time of withdrawal. The grade to date should be entered as a decimal between .00 and .99. Do not enter a letter grade. Must also complete Clock Hours. If this field is completed, do not complete Credits Granted or Final Subject Grade fields.
Credits Granted	Credits Granted options include: .00, .25, .50, .75, 1.00, 1.25, 1.50, 1.75, 2.00. All other credits granted not available in the drop down can be specified in notes column. Must also complete Final Grade. If this field is completed, do not complete Clock Hours or Grade to Date fields.
Final Grade	Final Subject Grade options include: A+, A, A-, B+, B, B-, C+, C, C-, D+, D, D-, F, P (Pass) Must also complete Credits Granted. Note: only final grades listed will be accepted. Do not list any unaccepted final grades in this column such as I, Inc, W, WF, U, NC, NG, etc. If this field is completed, do not complete Clock Hours or Grade to Date fields.
Notes	Provide any pertinent notes DEED should know. (e.g., name change, why the district was unable to collect course information for the child).

[Sample Title I-C Reports](#) can be found starting on page 175.

Priority for Services (PFS) K-2 Report

Due: October 15

This list will contain the names of students in grades K-2 (based on the previous school year's recruitment) who have made a qualifying move within the previous 1-year period and will be sent to districts by DEED. Districts will receive the PFS K-2 list from DEED by early August each year. Districts will be responsible for sending back the list of K-2 students to DEED by **October 15**, noting which of the students are failing, or at risk of failing, to meet the challenging State academic standards. These students should be selected based on district-determined criteria, such as DIBELS, preschool recommendation, etc.

Information collected on the Priority for Services (PFS) K-2 report:

Data Element	Description
Qualify as PFS	This is a yes (Y) or no (N) field used by the district to denote whether the child qualifies as PFS.
What Method Used to Determine "At Risk of Failing"	In this field, the district will describe the method used to determine that the migratory child is at risk of failing to meet the challenging State academic standards. Note: Criteria used must be consistent within grade levels.

[Sample Title I-C Reports](#) can be found starting on page 175.

Fidelity of Strategy Implementation (FSI) Tool

Due: November 5

Required by the U.S. Department of Education’s Office of Migrant Education, the FSI Tool is a self-assessment resource for districts to evaluate their level of implementation of Title I-C-funded strategies they applied to implement from the [State Service Delivery Plan \(SDP\)](https://education.alaska.gov/ESEA/TitleI-C/docs/migrant_service_delivery_plan.pdf) (education.alaska.gov/ESEA/TitleI-C/docs/migrant_service_delivery_plan.pdf). This resource will help address the implementation evaluation of the Title I-C program, aid in determining the extent to which Title I-C services are delivered with fidelity and inform State Title I-C staff and the program evaluator about the level of Strategy implementation at each local Title I-C program. Reflecting on services provided during the 2025-2026 school year, districts will complete the FSI Tool for Regular School Year and Summer Programs (as applicable). Districts will rate only those activities that were planned and carried out (do not rate planned activities that have not yet occurred), and only those activities implemented using Title I-C funds. Districts should receive the FSI Tool in the summer and the report will be due to DEED by **November 5**.

Information collected on the FSI Tool:

Data Element	Description
Strategy #	This section lists the strategy number the district is self-evaluating on that page. The district will only complete the page if the district applied for the specific strategy number listed. If they did not apply for the strategy in their ESEA Consolidated Application, the district will select the NOT APPLICABLE field, and the rest of the page can remain blank. Otherwise, if the district did apply for the strategy the rest of the sections of the evaluation tool should be completed.
Implementation Level	If the district applied for the strategy, they should select the checkbox corresponding to one of the options: Not Aware, Aware, Developing, Succeeding, or Exceeding.
How was the strategy implemented	In this column there are several checkboxes that districts can select based on their self-evaluation of the implementation of the strategy in their district. One or more options could be selected.
How did you use Title I-C funds?	In this column there are several checkboxes that districts can select based on their self-evaluation of the implementation of the strategy in their district. One or more options could be selected.
What documentation is kept on site?	In this column there are several checkboxes that districts can select based on their self-evaluation of the implementation of the strategy in their district. One or more options could be selected.
Comments	Districts may add comments to support or provide additional information related to the strategy they applied to implement. If the district selected “Developing” or a lower implementation level in the implementation section, the district is required to provide a comment to provide information the district is using to improve and what steps the district is taking to implement the strategy.

[Sample Title I-C Reports](#) can be found starting on page 175.

Fall Recruitment Report (FRR)

Due: November 15

The Fall Recruitment Report (FRR) serves as a to-do list showing all the eligible children in the district who have not yet reached their End of Eligibility date. The records manager must contact the families of all the children on the FRR. It is the main report used for fall recruitment; completion of this report by the district records manager is mandatory. Districts will receive the Fall Recruitment report from DEED by mid-August. The report must be filled out and returned to DEED in electronic format by the **November 15** deadline and the district must keep a copy on file (electronic or hard copy) with the Title I-C records for the required retention period.

All families of the children on the Fall Recruitment report should be contacted and interviewed to determine if their children:

- are still living in the district; **and**
- have made a new move(s); **and**
- are still attending school in the district.

Information collected on the Fall Recruitment Report (FRR):

Data Element	Description
Term Code Updated by District	List a term code (reason why the student exited the Title I-C program before the end of their eligibility), if applicable. Example: family moved to another district; district would enter term code "M." Refer to page 140 for a complete list of term codes .
Term Date Updated by District	Provide the date the student "termed out," if term code was provided. Example: family moved to another district on 10/15/26. Make sure to list all graduates and their graduation dates (term date).
Family Interviewed	Mark if the family was interviewed.
New COE for Family (New Move COE)	Indicate "Y" or leave blank to inform DEED whether a new COE was created for the child.
COE Recert (No New Move)	Indicate "Y" or leave blank to inform DEED whether a COE Recert was created for the child.
Uploaded to DEED	Indicate "Y" or leave blank if the COE or COE Recert was submitted to DEED in MIS2000.
Why No COE/COE Recert	List reason why there was no COE or COE Recert completed, if applicable.
Comments	Enter any other information DEED should know regarding the student (e.g., name change, new AK Student ID number, additional term code information).

If the district does not recertify all eligible children by **November 15** each year, those children may not be in the district count and the district may not receive Title I-C funding for them. However, they are still eligible for, and entitled to receive, Title I-C supplemental program services and free meal benefits.

[Sample Title I-C Reports](#) can be found starting on page 175.

Title I-C Literacy Grant Final Report

Due: June 15

This report is for districts that choose to participate in the Alaska Title I-C Literacy Grant. It is a short, final report that serves as the conclusion of the Literacy Grant year. The Final Report will be sent to districts in the spring. Districts will indicate how many books were ordered and how many migratory children received books. Districts will also describe the book distributions, and any associated activity, on the report that were paid for using Title I-C Literacy Grant funds.

Information collected on the Alaska Title I-C Literacy Grant Final Report:

Data Element	Description
Impact of the Literacy Grant	Briefly describe how the district utilized the Literacy Grant funds. How did the literacy grant help raise academic achievement for the district's migratory children? How did the literacy grant help the district achieve its local Title I-C measurable program goals?
Number of Books	Total number of books purchased through the Literacy Grant.
Number of Children Who Received a Book	Number of eligible migratory children who received a book (or other literature) funded through the Literacy Grant.
Certificated Teacher Led Literacy Instruction or Activity – Number of Children Attended	Number of eligible migratory children who participated in a related literacy instruction/activity led by a certificated teacher whose time to conduct the activity was funded through the Literacy Grant.
Non-Certificated Led Literacy Instruction or Activity – Number of Children Attended	Number of eligible migratory children who participated in a related literacy instruction/activity led by a non-certificated individual whose time to conduct the activity was funded through the Literacy Grant.

[Sample Title I-C Reports](#) can be found starting on page 175.

Mass Withdrawal (MW) Report

Due: June 15

Districts will receive the Mass Withdrawal report from DEED in April each year. The Mass Withdrawal report serves two purposes: to withdraw all migratory children and youth from MIS2000 each year, and to provide DEED with a list of Title I-C funded supplemental services each migratory child received during the school year. Through the Mass Withdrawal report, districts also report term codes and dates, such as graduates, out of school youth, and families who have moved out of district. The Mass Withdrawal report is one of the major resources consulted for preparing State and Federal reporting. Instructions on the Mass Withdrawal report are provided in the spring. Federal programs coordinators/Title I-C coordinators need to review the Mass Withdrawal report and complete the cover page worksheet. The deadline for submission of this report to DEED is **June 15**.

Information collected on the Mass Withdrawal (MW) report:

Data Element	Description
Withdraw Date	Enter the date of the last day of school for the district. Note: term date and withdrawal date do not have to match.
Term Type	List a term code (the reason a migratory child exited the Title I-C program before the end of their eligibility), if applicable. Example: family moved to another district; district would enter term code "M." Refer to page 140 for a complete list of term codes .
Term Date	Provide the date the student "termed out," if term code was provided. Example: family moved to another district on 12/15/25. Make sure to list all graduates and their graduation dates (term date).
SP Codes	Enter SP codes provided to each student. A full list of SP Codes starts on page 179. SP codes need to be separated by a comma and a space. SP codes do not need to be listed alphabetically.
COS Provision	Enter which continuation of services provision was used to provide services after a child's eligibility ends. See page 115 for more information on continuation of services .
COS SP Codes	List any SPs provided to the student after their EOE date during the regular school year. SP codes need to be separated by a comma and a space. SP codes do not need to be listed alphabetically. A full list of SP Codes starts on page 179.
IEP over 20	Use this field to verify if any child that turns 20 prior to the end of the school year has an active IEP on file with the district. If the district has an active IEP on file for the child, they should indicate Y for Yes in the column. If there is no active IEP on file for the child, a comment should be made in the COMMENTS section, and the field should remain blank. This field is only applicable to children that turn 20 prior to or during the school year.
Comments	Provide any other information DEED should know about each student (e.g., name change, term code information).

[Sample Title I-C Reports](#) can be found starting on page 175.

The Title I-C Coordinator

The purpose of this section is to provide guidance to the Title I-C coordinator in the design and execution of the district's Title I-C program. Federal programs coordinators and/or Title I-C coordinators have several responsibilities for the Title I-C program including but not limited to oversight of the Title I-C program, program planning, fiscal management, data collection, coordination of all Title I-C components, professional development and training, cross-program coordination, and quality control.

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General Requirements of the Title I-C Program

Districts that receive Title I-C funds must carry out a variety of activities as a condition of participating in the program including, but not limited to:

- [Identifying and recruiting](#) migratory children and youth.⁶¹
- Establishing and implementing a [system of quality controls](#) for proper ID&R of children.⁶²
- Promoting [interstate and intrastate coordination](#) of services for migratory children.⁶³
- Conducting [parent and family engagement](#) in the planning and operation of the Title I-C program.⁶⁴
- [Identifying and addressing the unique educational needs](#) of migratory children and youth.⁶⁵
- [Evaluating the effectiveness of the program](#) to improve services provided to migratory children.⁶⁶

⁶¹ ESEA, Section 1304(c)(8)

⁶² 32 CFR § 200.89(d)

⁶³ ESEA, Section 1304(b)(3)

⁶⁴ ESEA, Section 1304(c)(3)

⁶⁵ ESEA, Section 1306(a)(1)

⁶⁶ 32 CFR § 200.84

General Responsibilities of the Title I-C Coordinator

Federal program coordinator and/or Title I-C coordinator responsibilities include, but are not limited to:

Program Planning and Oversight

Identifying the Unique Needs of Migratory Children and Youth

- Work with the district Parent Advisory Council to help identify the unique needs of the migratory children and youth within the district.
- Send the annual Title I-C statewide survey to parents of migratory children to get feedback on the district Title I-C program, and the unique needs of the district's migratory children and youth.
- Send the annual Title I-C statewide survey to district staff to get feedback on the district Title I-C program, and the unique needs of the district's migratory children and youth.

Planning Supplemental Activities

- Use the identified unique needs of the district's migratory children and the grant application to plan supplemental activities and services for migratory children.
- Ensure Title I-C funds supplement services provided by other State or local funds for migratory children.
- Ensure Title I, Part C funded activities and services align with the identified needs outlined in the [State Comprehensive Needs Assessment \(CNA\)](https://education.alaska.gov/ESEA/TitleI-C/docs/cna_final_report.pdf) (education.alaska.gov/ESEA/TitleI-C/docs/cna_final_report.pdf) and the strategies outlined in the [State Service Delivery Plan \(SDP\)](https://education.alaska.gov/ESEA/TitleI-C/docs/migrant_service_delivery_plan.pdf) (education.alaska.gov/ESEA/TitleI-C/docs/migrant_service_delivery_plan.pdf).
- Ensure Title I-C costs of the service or activity follow the cost principles described in the Uniform Grant Guidance (2 CFR Part 200).

Grant Planning and Fiscal Management

- Use the [Grants Management System \(GMS\)](https://gms.education.alaska.gov) (gms.education.alaska.gov) to submit the Title I-C portion of the ESEA Consolidated Application.
- Complete revisions to the Title I-C portion of the ESEA Consolidated Application, as required.
- Ensure the application for the Title I-C Literacy Grant is completed and sent to DEED.

Ensuring all Required Plans are Written and Updated

- Establish written plans for identification & recruitment, quality control, needs assessment, service delivery, evaluation, and parent and family engagement.

The Alaska Department of Education and Early Development has created an optional template for districts to use that consolidates the required written policies and procedures districts must have for the Title I-C program into one document. It includes the: **IDENTIFICATION & RECRUITMENT PLAN**, **QUALITY CONTROL PLAN**, **COMPREHENSIVE NEEDS ASSESSMENT**, **SERVICE DELIVERY PLAN**, and **EVALUATION RESULTS**. Please note that the template is optional, but districts must have written policies and procedures that are covered in the [District Level Guiding Documents Template](https://education.alaska.gov/ESEA/TitleI-C/docs/District-Level-Guiding-Template.docx) (education.alaska.gov/ESEA/TitleI-C/docs/District-Level-Guiding-Template.docx).

Data Collection and Reporting

Tracking the Title I-C Funded Services Migratory Children and Youth Receive

- Establish and maintain a method of tracking supplemental services provided with Title I-C funds.
- Develop a written local service delivery plan.

Ensuring all Reports are Submitted

- Work with the district records manager to ensure that data provided on reports are accurate.
- Work with the district records manager to ensure that all reports are submitted by the due dates.

Identification & Recruitment

Training

- Federal programs coordinators and Title I-C coordinators should attend training within one year of hire.
- Federal programs coordinators and Title I-C coordinators should attend an in-person training once every three years to keep up to date with identification, recruitment, and records management procedures.
- Ensure that recruiters and records managers attend fall training annually or as directed by DEED.

Quality Control

- Establish a quality control process for ensuring the correctness of the information used to determine each child's eligibility under the Title I-C program definitions.
- Evaluate the recruitment practices of individual recruiters. Refer to the [Sample Recruiter Observation Skills Form](#) on page 182 for an example form.

Recruit and Re-recruit Migratory Children and Youth by November 15

- Develop a written ID&R Plan that includes recruitment efforts year-round throughout the community.
- Hire qualified staff and provide for annual training related to the State's ID&R procedures.
- Meet all deadlines for the submission of records and adhere to the State's established procedures for the identification and recruitment of migratory children and youth.
- Work with the district records manager to ensure that all migratory children and youth in the district are recruited annually before the November 15 deadline.
- Continue recruitment year-round as children come to the attention of the Title I-C program (i.e., mid-year transfers, new qualifying moves).

Continuous Improvement Cycle

Statewide Title I-C Continuous Improvement Cycle

The Alaska Title I-C Program is based on two guiding documents required of all States. They are the Comprehensive Needs Assessment (CNA) and the Service Delivery Plan (SDP). Both documents for Alaska can be found on DEED's [Title I-C webpage](https://education.alaska.gov/ESEA/TitleI-C/) (education.alaska.gov/ESEA/TitleI-C/).

Comprehensive Needs Assessment (CNA)

The primary purpose of a Comprehensive Needs Assessment (CNA) is to guide the overall design of the Title I-C program on a statewide basis. Alaska's most recent CNA was finalized in July 2025. The CNA committee identified four areas of need for the Alaska Title I-C Program: academic support in English language arts (ELA) and mathematics, early learning and school readiness, high school graduation and out of school youth (OSY) achievement, and support services.

A needs assessment is a systematic assessment and decision-making process that progresses through a defined series of phases to determine needs, examine their nature and causes, and set priorities for future action. A needs assessment is comprehensive as long as it:

- includes both needs identification and the assessment of potential solutions;
- addresses all relevant performance targets established for migratory children (i.e., proficiency in ELA and mathematics, graduation rates, dropout rates, and any other program goals set for migratory children);
- identifies the needs of migratory children at a level that is useful for program design purposes;
- collects data from appropriate target groups (i.e., parents, or teachers)
- examines data disaggregated by key subgroups; and
- is conducted on a statewide basis.

Service Delivery Plan (SDP)

States are required by ESEA to develop a Title I-C specific plan that will assist migratory children in making progress toward the achievement of the State's long-term goals and measurements of interim progress. This plan, known as the Service Delivery Plan (SDP), outlines the delivery and evaluation of the services provided to migratory children through their local Title I-C program. The SDP is developed from the results of an up-to-date statewide CNA.

The SDP is a comprehensive plan that describes the services the State will provide directly or through districts to meet the unique needs of migratory children; in other words, it is the State's operational plan for the Title I-C Program.

Alaska's most recent Service Delivery Plan was updated as of February 2026. This plan outlines strategies for meeting the needs of migratory children and youth identified in the CNA. It also sets Measurable Program Outcomes (MPOs) on which the Title I-C program will be evaluated.

Evaluation of Effectiveness

States are required to evaluate the effectiveness of the Title I-C program and to provide guidance to their local projects on how to conduct local evaluations. A proper evaluation can provide powerful information regarding how best to use Title I-C funds to achieve the desired result. The evaluation determines whether and to what degree the program is effective in relation to the performance targets and measurable outcomes. The main methods used to do this are by measuring:

- The progress toward the desired measurable program outcomes (MPOs) the Title I-C program aimed to achieve in the SDP.

- The level of implementation of each strategy in the SDP to determine the extent to which Title I-C funded services were delivered with fidelity.

Fidelity of Strategy Implementation (FSI) Tool

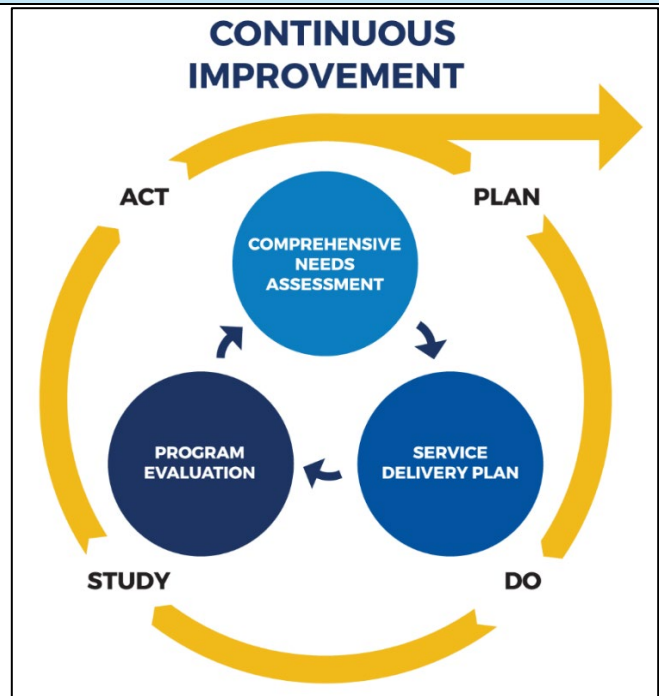
The Fidelity of Strategy Implementation FSI Tool is a self-assessment resource for districts to evaluate their level of implementation of Title I-C-funded strategies they applied to implement from the [State Service Delivery Plan \(SDP\)](https://education.alaska.gov/ESEA/TitleI-C/docs/migrant_service_delivery_plan.pdf) (education.alaska.gov/ESEA/TitleI-C/docs/migrant_service_delivery_plan.pdf). More information can be found in the [Title I-C Reports](#) section, which starts on page 97. The state uses the submitted reports for the statewide evaluation of the program.

District Title I-C Continuous Improvement Cycle

Overview

In planning the district's Title I-C program, consider the annual continuous improvement cycle of the Title I-C program. In this cycle, each step in developing a program—assessing needs, identifying strategies, implementing strategies, and evaluating the results builds on the previous activity and informs the subsequent activity.

The needs assessment provides an opportunity to review data about migratory children and review the progress toward program goals included in the Title I-C program evaluation. This information is used to identify further needs and to propose evidence-based strategies to meet those needs. The needs assessment, in turn, informs the service delivery plan. In the process of developing a plan for providing services to migratory children, a planning team reviews the strategies, prioritizes them, and develops a plan for implementing them.



The program evaluation assesses the level of implementation, and the Title I-C program uses the results to improve its delivery of services, particularly for migratory children identified under the Priority for Services (PFS) provision. The Title I-C program also uses the program evaluation to determine the progress of migratory children toward Federal and State goals. The program evaluation feeds into the needs assessment process and the cycle continues.

Needs Assessment

A needs assessment is a systematic assessment and decision-making process that progresses through a defined series of phases to determine needs, examine their nature and causes, and set priorities for future action. Similar to the State CNA, districts conduct a local needs assessment to determine the needs of local migratory children. The district can consult a variety of sources for the needs assessment including, but not limited to: annual staff surveys, annual parent surveys, annual State assessment results, and progress monitoring assessment results. During the monitoring process, DEED will verify that the district needs assessment is aligned with the State CNA, including elements in the following four goal areas: academic support in ELA and mathematics, high school graduation, school readiness, and support services. DEED will also verify that the needs assessment has identified the unique educational needs of

migratory children that result from their migratory lifestyle and other needs of migratory children that must be met for them to participate effectively in school.

The district cannot reasonably design the Title I-C program or determine the grade levels and instructional areas on which individual projects should focus without information on the unique educational needs of all eligible children identified in the district. At the district level, a needs assessment determines:

1. the extent of the needs of migratory children and youth in the district area and how those needs relate to the priorities the State has established;
2. how to design local services; and
3. which students should receive services.

For more information, refer to DEED's [Needs Assessment Guidance](https://education.alaska.gov/ESEA/TitleI-C/docs/NeedsAssessmentGuidanceTitleI-C.pdf) (education.alaska.gov/ESEA/TitleI-C/docs/NeedsAssessmentGuidanceTitleI-C.pdf).

Service Delivery Plan

The district's service delivery plan should be a written document that outlines many of the district's policies and procedures. In the district's service delivery plan, the district must choose the applicable strategies from the list of service delivery strategies in the State SDP to implement to meet the needs of the district's migratory children. The service delivery plan is the basis for the use of all Title I-C funds in the district.

States must develop measurable program outcomes (MPOs) for the Title I-C program that are appropriate measures of the success of the program and that contribute to the achievement of the State's performance targets. Districts must develop measurable program outcomes (MPOs) that are aligned with the State's measurable outcomes for the Title I-C program.

The service delivery plan helps the district develop and articulate a clear vision of:

1. the needs of migratory children;
2. the district and State's Title I-C measurable program outcomes (MPOs) and how they help achieve the State's performance targets;
3. the services the district Title I-C program will provide; and
4. how to evaluate whether, and to what degree, the program is effective.

For additional information regarding services, refer to DEED's [Provision of Services Guidance](https://education.alaska.gov/ESEA/TitleI-C/docs/ProvisionofServicesGuidanceTitleI-C.pdf) (education.alaska.gov/ESEA/TitleI-C/docs/ProvisionofServicesGuidanceTitleI-C.pdf).

Evaluation

Districts must conduct a local project evaluation that measures both the implementation of the project and student performance against the district's measurable outcomes, the State's measurable outcomes, and the State's performance targets.

Evaluations allow districts to:

1. determine whether the program is effective and document its impact on migratory children;
2. improve program planning by comparing the effectiveness of different types of interventions;
3. determine the degree to which projects are implemented as planned and identify problems that are encountered in program implementation; and
4. identify areas in which children may need different Title I-C services.

As a resource, DEED provides districts with an Education of Migratory Children Program Summative Data Report (MSDR) annually in the spring. This document is just one of several resources districts should utilize when evaluating their local Title I-C program.

The results from the evaluation can be incorporated into the needs assessment for the following year.

For additional information regarding Title I-C evaluations, refer to DEED's [Program Evaluation Guidance](https://education.alaska.gov/ESEA/TitleI-C/docs/ProgramEvaluationGuidanceTitleI-C.pdf) (education.alaska.gov/ESEA/TitleI-C/docs/ProgramEvaluationGuidanceTitleI-C.pdf).

Fidelity of Strategy Implementation (FSI) Tool

The Fidelity of Strategy Implementation FSI Tool is a self-assessment resource for districts to evaluate their level of implementation of Title I-C-funded strategies they applied to implement from the [State Service Delivery Plan \(SDP\)](https://education.alaska.gov/ESEA/TitleI-C/docs/migrant_service_delivery_plan.pdf) (education.alaska.gov/ESEA/TitleI-C/docs/migrant_service_delivery_plan.pdf). More information can be found in the [Title I-C Reports](#) section, which starts on page 97.

Consultation Requirements

Parents of Migratory Children

Parent and family engagement is an integral part of all Title I programs, including the Title I-C program. Research shows that parents play a significant role in the academic achievement of their children. Therefore, it is important for parents and schools to develop partnerships and build ongoing dialogues to improve student achievement. Title I supports parent and family engagement by enlisting individual parents to help their children do well in school. To receive Title I-C funds, districts must implement programs, activities, and procedures that effectively engage parents of migratory children.

Districts must consult with parents of migratory children in the planning and operation of the Title I-C program.⁶⁷ This consultation must be in a format and language understandable to the parents. Districts are required to have, at minimum, one annual meeting of parents of migratory children, although a local Parent Advisory Council (PAC) is recommended.

The annual meeting should address the following:

- consultation with parents of migratory children regarding the planning and operating of the local Title I, Part C program;
- the design and implementation of the local Title I-C Service Delivery Plan;
- migratory child data showing progress on performance targets and measurable program outcomes;
- information about the Title I-C program services available to their children; and
- strategies to increase engagement of parents of migratory children in supporting their children's education.

Benefits of Parent Consultation

As the first teachers of their children, parents know the needs of their children best and can provide insight into their children's strengths and weaknesses. As such, parents of migratory children can play a pivotal role in planning the educational programs and projects in which their children participate. Engaging parents of migratory children in planning the Title I-C program also builds their capacity to assist in their children's learning at home. In addition, parental engagement in the planning of the program enables parents to understand the program and have informed conversations with Title I-C program and school staff regarding their children's education. Through their participation in the planning process, parents of migratory children are also more likely to become advocates and supporters of the program because they have a personal stake in its success.

⁶⁷ ESEA, Section 1304(e)

Tribes or Tribal Organizations

To ensure timely and meaningful consultation on issues affecting American Indian and Alaska Native students, districts that meet certain requirements⁶⁸ must consult with appropriate officials from tribes or tribal organizations approved by the tribes located in the area served by the districts prior to the district's submission of their ESEA Consolidated Application. Such consultation must be done in a manner and in such time that provides the opportunity for such appropriate officials from tribes or tribal organizations to meaningfully and substantively contribute to such plan.⁶⁹

Each district that is required to conduct this consultation must maintain in the district's records and provide the State a written affirmation signed by the appropriate officials of the participating tribes or tribal organizations approved by the tribes, that the consultation required by this section has occurred. If such officials do not provide such affirmation within a reasonable period of time, the district must forward documentation that such consultation has taken place to the State.⁷⁰

Additional information can be found on [DEED's ESEA General Provisions webpage](http://education.alaska.gov/esea/general-provisions) (education.alaska.gov/esea/general-provisions).

Private Schools

Districts must engage in timely and meaningful consultation with appropriate private school officials.⁷¹ The district and private school officials shall both have the goal of reaching agreement on how to provide equitable and effective programs for migratory eligible private school children, on issues such as:

- how the children's needs will be identified;
- what services will be offered;
- how, where, and by whom the services will be provided;
- how the services will be assessed and how the results of the assessment will be used to improve services;
- the size and scope of the equitable services to be provided to the eligible private school children, the amount of funds available for those services, and how that amount is determined;
- how and when the district will make decisions about the delivery of services; and
- whether the district shall provide services directly or through a separate government agency, consortium, or entity, or through a third-party contractor.

Each district shall maintain in their records, and provide to the State, a written affirmation signed by officials of each participating private school that the meaningful consultation required by this section has occurred. The written affirmation shall provide the option for private school officials to indicate such officials' belief that timely and meaningful consultation has not occurred or that the program design is not equitable with respect to eligible private school children. If such officials do not provide such affirmation within a reasonable period of time, the district shall forward the documentation that such consultation has, or attempts at such consultation have taken place, to the State.⁷²

Additional information can be found on [DEED's Private School webpage](http://education.alaska.gov/esea/private-schools) (education.alaska.gov/esea/private-schools).

⁶⁸ Districts that are required to consult with tribes or tribal organizations are districts: (A) with an enrollment of American Indian or Alaska Native students that is not less than 50 percent of the total enrollment of the local educational agency; or (B) that received a grant in the previous fiscal year under Title VI (Indian Education) that exceeded \$40,000. (ESEA, Section 8538(c)(1))

⁶⁹ ESEA, Section 8538(a)

⁷⁰ ESEA, Section 8538(b)

⁷¹ ESEA, Section 8501(c)(1)

⁷² ESEA, Section 8501(c)(5)

Title I-C Activities and Service Delivery

For purposes of the Title I-C program, services are a subset of all the activities that the Title I-C program provides through the program. Although districts may spend Title I-C funds on many types of allowable activities, some of these activities do not constitute a service (e.g., identification and recruitment or parent and family engagement activities). Services are distinct in that they are the educational or educationally related activities provided to migratory children to enable them to succeed in school. Because student success is the overarching goal of the Title I-C program, services are a vital aspect of the program. In providing services, districts must give priority to migratory children who are priority for service (PFS).

In general, districts may use Title I-C funds for allowable activities and supplemental services, as long as those activities and services address an identified need of migratory children. Refer to the [General Spending Considerations](#) section on page 126 for information regarding how to determine if Title I-C funds may be used for a particular activity or service.

Activities

Some expenses are allowable that are not used to provide direct services to students.

Possible activities a district could fund:

- Identification & Recruitment
- Records Management
- Administration of the Program
- Parent and Family Engagement
- Parent Meetings
- Professional Development (i.e., training programs for school personnel to enhance their ability to understand and appropriately respond to the needs of migratory children)

Supplemental Services

The U.S. Department of Education, Office of Migrant Education (OME) has issued specific non-regulatory guidance to define what constitutes a service in the Title I-C program. For purposes of the Title I-C program, services are a subset of all the activities that the Title I-C program provides through its programs and projects. Although States and districts may spend Title I-C funds on many types of allowable activities, some of these activities do not constitute a service (i.e., identification and recruitment or parent and family engagement activities). Services are distinct in that they are the educational or educationally related activities provided to migratory children to enable them to succeed in school. Because student success is the overarching goal of the Title I-C program, services are a vital aspect of the program.

Services are those educational or educationally related activities that:

- directly benefit a migratory child;
- address a need of a migratory child consistent with the State's [Comprehensive Needs Assessment](#) (education.alaska.gov/ESEA/TitleI-C/docs/cna_final_report.pdf) and [Service Delivery Plan](#) (education.alaska.gov/ESEA/TitleI-C/docs/migrant_service_delivery_plan.pdf);
- are evidence-based or, in the case of support services, are a generally accepted practice; and
- are designed to enable the program to meet its measurable outcomes and contribute to the achievement of the State's performance targets as outlined in the Service Delivery Plan.⁷³

⁷³ Non-Regulatory Guidance, Chapter V, #A1
2026-2027 Title I-C District Staff Manual

Types of Supplemental Services

- **Instructional** – Title I-C funded⁷⁴ supplemental services that provide evidence-based instruction to migratory children in a subject area on a regular or systematic basis, usually for a predetermined period of time. It can include instruction provided by Title I-C-funded certificated teachers or Title I-C-funded non-certificated individuals (e.g., paraprofessionals). It can include correspondence courses taken by a student. The one-time act of providing instructional packets to a child or family does not constitute an instructional service.
- **Support** – Title I-C funded⁷⁵ supplemental services to provide support and advocacy to migratory children. These services include, but are not limited to, health, nutrition, counseling, and social services for migratory children, necessary educational supplies, and transportation.

Possible services a district could offer:

- Academic Instruction
- Tutoring
- After School Programs
- Help with School Supplies
- Graduation Support
- Career Education Services
- Support Services
- Health Services
- Distance Learning Programs
- Counseling and Testing Services
- Parent and Family Engagement Activities
- Referral to Local Agencies
- Preschool Services
- Literacy Materials through the Literacy Grant
- Family Literacy Nights
- Saturday Programs
- Summer or Intersession Programs
- Credit Recovery Programs

Types of Service Delivery

Districts have used a wide variety of service delivery designs. Districts can offer one or more types of programs to migratory children:

- During school day, during regular school year
- Extended time during regular school year
- Summer
- Preschool

Note: It is often difficult to show that Title I-C services are supplemental if the district's Title I-C program is offering services during the school day, during the regular school year.

Consolidation of Title I-C Funds into a Title I-A Schoolwide Program

Under certain conditions, ESEA allows Title I-A Schoolwide schools to consolidate Title I-C funds with other Federal, State, and local funds to support any component of the educational schoolwide plan. Consolidation of Title I-C funds is a three-step process:

1. prerequisites must be met;
2. data must be gathered and analyzed; and
3. documentation must be uploaded in GMS.

For further information about consolidation of Title I-C funds into the schoolwide program, please consult the guidance located in the [GMS Document Library](https://gms.education.alaska.gov/DocumentLibrary) (gms.education.alaska.gov/DocumentLibrary) and/or contact the Title I-C program manager. [DEED Title I-C Program Contacts](#) can be found on page 184.

⁷⁴ Title I-C-funded is any supplemental service that is funded in whole or in part with Title I-C funds.

⁷⁵ Title I-C-funded is any supplemental service that is funded in whole or in part with Title I-C funds.

Selecting Migratory Children for Supplemental Services

When selecting children for services, the district should:

1. identify the eligible migratory children with unique educational needs who reside in the area;
2. determine the educational and educationally related needs of the children to be served;
3. determine the focus of the program (i.e., instructional areas) based on a needs assessment; and
4. select children with the greatest need for Title I-C services according to the [priority for services criteria](#)⁷⁶ on page 118.

Priority for Services

In accordance with the Priority for Services (PFS) provision⁷⁷, the districts must prioritize services for migratory children who have made a qualifying move within the previous one-year period and who: are failing, or most at risk of failing, to meet the challenging State academic standards; or have dropped out of school.

Alaska's districts receiving Title I-C funds must target funds to provide services to migratory children. Districts may serve children who do not meet the "priority for services" criteria so long as they serve children who meet the criteria first. For example, a Title I-C project that operates only in the summer may serve migratory children who reside in the area during the summer, provided it gives priority for summer services to migratory children who meet the priority for services criteria. Refer to page 118 for [Alaska's PFS Criteria](#).

Preschool and Dropped Out of School

In addition to children who meet the criteria of the PFS provision, the needs of preschool migratory children and migratory children who have dropped out of school must also be addressed by the districts, as part of their efforts to address the unique educational needs of migratory children more generally. It is a requirement that the unique needs of migratory children, including preschool migratory children and migratory children who have dropped out of school, are identified and addressed.⁷⁸ Furthermore, districts must, in carrying out their programs and projects, address the unmet needs of preschool migratory children and migratory children who have dropped out of school.⁷⁹

Continuation of Services

Under the continuation of services provision,⁸⁰ school districts may choose to offer continuation of services (COS) to migratory children whose eligibility has ended, under the following conditions:

1. A child who ceases to be a migratory child during a school term shall be eligible for services **until the end of such term** (i.e., fall, spring, summer).
 - The first subsection of the COS provision provides that any child who ceases to be migratory (i.e., reaches the end of their Title I-C eligibility period) during a school term shall be eligible for services until the end of such term. The USED Office of Migrant Education (OME) interprets this to be applicable to any formerly eligible child, including OSY, and regardless of whether the child received Title I-C funded services during their eligibility period.
2. A child who is no longer a migratory child may continue to receive services for **1 additional school year**, but only if comparable services are not available through other programs.

⁷⁶ ESEA, Section 1304(d)

⁷⁷ ESEA, Section 1304(d)

⁷⁸ ESEA, Section 1304(b)(1)

⁷⁹ ESEA, Section 1304(c)(4)

⁸⁰ ESEA, Section 1304(e)

- The second subsection of the COS provision allows a child who is no longer Title I-C-eligible to continue to receive Title I-C services for one additional school year, but only if comparable services are not available. This may be applied to OSY, if he/she received Title I-C-funded services at some point during his/her period of eligibility and provided that the Title I-C program is able to document that comparable services are not available.
3. Students who were eligible for services in secondary school may continue to be served through **credit accrual programs until graduation**.
- OME interprets the third subsection of COS to be applicable to a specific subset of all formerly eligible migratory children, based on the use of the term “students” rather than “children,” so only those children who meet all the following criteria may be served through credit accrual programs until graduation:
 - Received Title I-C-funded services at some point during their period of eligibility (not necessarily credit accrual services),
 - Were Title I-C-eligible while in secondary school, and
 - Are considered by the State to be secondary school students.

Examples:

COS Provision	Brief Description	Example
1	If EOE is mid-semester, child can <u>continue</u> to be served until end of that semester.	Child EOE's in October. Serving him/her until winter break would be COS 1.
2	Already EOE'd, child can <u>continue</u> to receive services for 1 more school year if comparable services are not available elsewhere.	Child EOE's in October. Serving him/her until the end of the school year would be COS 2.
3	Already EOE'd <i>secondary students</i> can <u>continue</u> to receive services (credit accrual only) until graduation, if comparable services are not available elsewhere (must have previously received services in grades 7-12).	Child EOE's in June after 10 th grade. He/she received services in 8 th , 9 th , & 10 th grade. Providing credit accrual services (only), until he/she graduates would be COS 3.

Before the district provides services under these provisions, it should consider whether the child's unmet unique educational needs are addressed by the general school program and whether migratory children who have been identified as priority for services have already been served.

Please note that utilizing any of the above COS provisions needs to be a *continuation* of services. That is, a migratory child must have previously received supplemental services through the Title I-C program during his/her eligibility period to qualify for continuation of services. A formerly eligible child should not be receiving Title I-C services for the first time after his/her eligibility has ended.

Be aware that children who have aged out of the program, graduated, or whose eligibility has ended due to a canceled COE (and do not have eligibility from a previous COE) are **not** eligible for continuation of services.

Refer to page 181 for a [Sample Continuation of Services Approval Form](#).

Children Who Have Aged Out of the Title I-C Program

The Office of Migrant Education (OME) does not consider individuals who aged out of the program to be eligible for the Title I-C program, nor do they consider such individuals eligible to receive Title I-C program services under the COS authority, because such individuals do not meet the definition of “child.” As described in Chapter II of the Title I-C Non-Regulatory Guidance (NRG), to be eligible for the Title I-C program, a child must meet the definition of “migratory child” and “eligible children” in the statute and regulations that apply to the Title I-C program and have the basis for Title I-C program eligibility documented on a Certificate of Eligibility (COE). According to section 1115(c)(1)(A) of the Elementary and Secondary Education Act of 1965 (ESEA) as amended (incorporated into the Title I-C program by sections 1304(c)(2), 1115(b), and 1309(3) of the ESEA and 34 CFR §200.103(a)), a “child” needs to be under 20 years of age, or under 22 years of age with an active Individualized Education Program (IEP) on file.

As described in the NRG, in certain situations, a district may continue to provide Title I-C program services to children whose Title I-C program eligibility has ended. However, given the use of the term “child” in this statutory provision (section 1304(e)), OME interprets COS to be applicable only to individuals who meet the definition of “child”. OME acknowledges that the third COS provision (section 1304(e)(3))) uses the term “students” as opposed to “child”, but they consider students to be a subset of all children for purposes of the Title I-C program.

Priority for Services (PFS) Criteria

The State of Alaska receives Title I-C funds from the U.S. Department of Education, Office of Migrant Education (OME), to carry out the Federal Title I, Part C law which requires that priority must be given to migratory children who have made a qualifying move within the previous 1-year period **and** who— (1) are failing, or most at risk of failing, to meet the challenging State academic standards; or (2) have dropped out of school. ⁸¹

Alaska's Migratory Children Priority for Services Criteria

One factor from criteria A and one factor from either criteria B1 or criteria B2 must be met for a migratory child/youth to be considered PFS. Criteria A + (Criteria B1 or Criteria B2) = PFS Student.

Criteria A

A student meets the criteria for making a qualifying move within the previous 1-year period of:

- ☐ The Qualifying Arrival Date (QAD) of the most recent migratory move was within the previous 1-year period,

AND

Criteria B1

A student meets the criteria for failing, or most at risk of failing, to meet the challenging State academic standards if one of the following criteria exists:

- ☐ Any eligible migratory child in grades K-2 who is determined to be at risk of failing to meet the challenging State academic standards through a district-determined assessment such as the DIBELS, the English language proficiency assessment, or appropriate universal screening assessment; or
- ☐ Any eligible migratory child in grades 3-9 who is below proficient in English language arts and/or math on the State summative assessment; or
- ☐ Any eligible migratory child in grades 10-12 who is determined to be at risk of failing to meet the challenging State academic standards through failing grades – student receiving D grade or below, or an incomplete, in a course during the previous 1-year period; or
- ☐ Any eligible migratory child in grades 10-12 who is determined to be at risk of failing to meet the challenging State academic standards through retention of grade – student is enrolled in same grade level from one school year to the next.

OR

Criteria B2

A student meets the criteria for dropping out of school if:

- ☐ The eligible student has dropped out of school.

Identifying Priority for Services (PFS) Students

Grades K-2

1. For students who were in grades K-2 during the 2025-2026 school year, DEED will identify those students who meet Criteria A of the PFS definition by having made a qualifying move within the previous 1-year period. DEED will send this list of K-2 students to the districts at the beginning of the 2026-2027 school year. Refer to page 115 for [PFS definition](#).
 - This list will contain names of students in grades K-2 during the 2025-2026 school year who had a qualifying arrival date (QAD) between 06/01/2025 through 05/31/2026.

⁸¹ ESEA, Section 1304(d)

2. Districts will be responsible for sending back the list of K-2 students to DEED by October 15, 2026, noting which of the students are failing or at risk of failing, to meet the challenging State academic standards.
 - These students should be selected based on district determined criteria, such as DIBELS, the English language proficiency assessment, or another appropriate universal screening assessment.
3. DEED will flag these students as PFS in MIS2000.
 - The data field that flags students as PFS can only be accessed for data entry by DEED.
 - District personnel will be able to see whether a student has been flagged as PFS in MIS2000.
4. To view the list of children identified as PFS, districts pull lists of PFS children from the Alaska Migrant Web System. It is recommended that districts periodically pull this report to ensure that they have the complete list of PFS children. Refer to the **PULLING REPORTS IN THE WEB SYSTEM** section in the [MIS2000 User Guide](https://education.alaska.gov/ESEA/TitleI-C) (education.alaska.gov/ESEA/TitleI-C) for more information on how to pull lists of PFS children.
5. Records managers should ensure that the list of PFS students is communicated to the Title I-C program coordinator and/or person overseeing the PFS program so that appropriate services are targeted to these students.

Grades 3-9

1. For students who were in grades 3-9 during the 2025-2026 school year, DEED will identify those students who meet Criteria A and Criteria B1 or B2 of the PFS definition using a combination of data from MIS2000 and the State summative assessment data.
2. DEED will flag these students as PFS in MIS2000.
 - The data field that flags students as PFS can only be accessed for data entry by DEED.
 - District personnel will be able to see whether a student has been flagged as PFS in MIS2000.
3. In the fall, DEED will notify districts once the PFS determinations have been made. Refer to page 115 for [PFS definition](#).
 - The determinations will include children in grades 3-9 during the 2025-2026 school year who had a qualifying arrival date (QAD) between 06/01/2025 through 05/31/2026 and were below proficient in English language arts and/or math on the 2025-2026 State summative assessment or had dropped out of school.
 - The timeframe in which the determinations are made is dependent upon when the State summative assessment results are made available.
4. To view the list of children identified as PFS, districts pull lists of PFS children from the Alaska Migrant Web System. It is recommended that districts periodically pull this report to ensure that they have the complete list of PFS children. Refer to the **PULLING REPORTS IN THE WEB SYSTEM** section in the [MIS2000 User Guide](https://education.alaska.gov/ESEA/TitleI-C) (education.alaska.gov/ESEA/TitleI-C) for more information on how to pull lists of PFS children.
5. Records managers should ensure that the list of PFS students is communicated to the Title I-C program coordinator and/or person(s) overseeing the PFS program so that appropriate services are targeted to these students.

Grades 10-12

1. For students who were in grades 10-12 during the 2025-2026 school year, DEED will identify those students who meet Criteria A and Criteria B1 or B2 of the PFS definition using a combination of data from MIS2000.
2. DEED will flag these students as PFS in MIS2000.
 - The data field that flags students as PFS can only be accessed for data entry by DEED.
 - District personnel will be able to see whether a student has been flagged as PFS in MIS2000.
3. In the fall, DEED will notify districts once the PFS determinations have been made. Refer to page 118 for [PFS definition](#).
 - The determinations will include children in grades 10-12 during the 2025-2026 school year who had a qualifying arrival date (QAD) between 06/01/2025 through 05/31/2026 and had failing grades, retention of grade, or had dropped out of school.
4. To view the list of children identified as PFS, districts pull lists of PFS children from the Alaska Migrant Web System. It is recommended that districts periodically pull this report to ensure that they have the complete list of PFS children. Refer to the [PULLING REPORTS IN THE WEB SYSTEM](#) section in the [MIS2000 User Guide](#) (education.alaska.gov/ESEA/TitleI-C) for more information on how to pull lists of PFS children.
5. Records managers should ensure that the list of PFS students is communicated to the Title I-C program coordinator and/or person overseeing the PFS program so that appropriate services are targeted to these students.

Identifying PFS Migratory Children During the School Year

If any additional migratory children meet the PFS criteria during the 2026-2027 school year, the records manager must alert the data specialist at DEED to flag that student as PFS.

Examples:

- A 5th grade student is newly certified as migratory and has a qualifying arrival date within the previous 1-year period. The student scored below proficient on the State summative assessment.
- An 11th grade migratory child, who has a qualifying arrival date within the previous 1-year period, drops out of school.

Coordination with Other Programs

Districts must identify and address the unique educational needs of migratory children by providing them a full range of services from appropriate local, State, and Federal educational programs.⁸² In providing these services, districts must plan jointly with local, State, and Federal programs and integrate the Title I-C program with services provided by other programs. By coordinating with other programs, the districts ensure that the needs of migratory children are met through a variety of sources in a way that leverages other program funds and optimizes the use of Title I-C funds for the unique needs of migratory children. Districts must determine the children's needs and identify all the available services that address these needs. Districts should then coordinate with those programs and agencies to provide services that meet the identified needs and help ensure that migratory children have access to appropriate programs and services.

Districts need to consider a full range of programs and carefully determine which ones to coordinate with to maximize the quality of, and access to, educational opportunities for migratory children. Below are a few examples of programs with which districts may coordinate to meet the needs of migratory children.

Other ESEA Programs

Title I-A – Improving Basic Programs

Districts that receive Title I-A must ensure that eligible migratory children and formerly migratory children are selected to receive Title I-A services on the same basis as other eligible children.⁸³ In a schoolwide program, schools must implement reform strategies that address the needs of all children in the school.⁸⁴ In a targeted assistance school, migratory children are eligible to participate in the Title I, Part A program on the same basis as other eligible children.⁸⁵

Title III-A – Language Instruction for English Learners and Immigrant Students

If the district qualifies for a Title III sub-grant, migratory children who are English Learners must be selected to receive Title III services on the same basis as all other English Learner children.

Title IV-A – Student Support and Academic Enrichment

This program is intended to improve students' academic achievement by increasing the district's capacity to: 1) provide all students with access to a well-rounded education; 2) improve school conditions for student learning; and 3) improve the use of technology to improve the academic achievement and digital literacy of all students.

Title IV-B – 21st Century Community Learning Centers

This program supports the creation of community learning centers that provide academic enrichment opportunities during non-school hours for children, particularly students who attend high-poverty and low-performing schools.

⁸² ESEA, Sections 1304(b) and 1306(a)

⁸³ ESEA, Section 1112(c)(1)

⁸⁴ ESEA, Sections 1114(b)(7)(i) and (iii)

⁸⁵ ESEA, Sections 1115(c)(2)(A) and (C)

Title V-B – Rural & Low-Income School Program (RLIS) & Small Rural School Achievement Program (SRSA)

The purpose of these programs is to provide rural districts with financial assistance for initiatives aimed at improving student achievement. Awards are issued annually through the U.S. Department of Education (USED).

Title VI-A – Indian Education

The purpose of this program is to support the efforts of districts, tribes and tribal organizations, and other entities in developing programs for American Indian/Alaska Native students that are designed to: meet the unique cultural, language, and educational needs of such students; and ensure that all students meet the challenging State academic standards. USED manages these awards.

McKinney-Vento Homeless Assistance Act – Education for Homeless Children

Collaboration between Title I-C program and the local Homeless Liaison to serve migratory children and youth experiencing homelessness ensures that services are provided in an efficient, non-duplicative fashion and that students receive a full range of support to meet their needs.

Title I-C personnel can provide the local Homeless Liaison with the following: insights on the work patterns of local migratory communities, understanding of the educational, health, emotional, or social needs unique to migratory children; locations of migratory camps and communities; referrals of migratory children and youth who may be experiencing homelessness; and contact and communication with families of migratory children whose children may be eligible for, and in need of, the educational services provided by the McKinney-Vento Act.

The local Homeless Liaison can provide Title I-C personnel with the following: guidance in determining which migratory children and youth are eligible for McKinney-Vento services according to the definition of homeless; understanding of the provisions of the McKinney-Vento Act and ways it may be used to provide services, including immediate school enrollment and school stability, to eligible migratory children; assistance with accessing supports available through Title I, Part A, homeless set-aside funds; and knowledge of community referral resources, including providers of health, mental health, housing, and basic needs services.

By working together, the Title I-C program and the local Homeless Liaison benefit migratory children and youth experiencing homelessness in their education and beyond by ensuring they are served efficiently and effectively with a comprehensive array of services.

Other Federal Programs

Below are examples of some other federally funded programs in which the Title I-C program could coordinate with.

U.S. Department of Agriculture – Child Nutrition Programs

Child Nutrition Programs provide healthy, nutritious meals and snacks to the Nation's children. Through the National School Lunch Program and School Breakfast Program, school children have access to healthy meals. Through the Special Milk Program, school children who do not have access to other meal programs can supplement their day with a serving of milk. Through the Child and Adult Care Food Program, children in childcare settings have access to healthy meals and snacks. Day care centers and home day care providers can participate in these programs. Through the Summer Food Service Program, children are provided with healthy meals during those times when school is closed for the summer.

U.S. Department of Education – Individuals with Disabilities Education Act (IDEA)

IDEA provides early intervention, transitional services, professional development, technical assistance, and dissemination of knowledge about best practices to improve results for children with disabilities, including migratory children with disabilities.

U.S. Department of Health and Human Services – Head Start Program

Provides comprehensive developmental services to income eligible children from birth to age 5 to increase their school readiness.

U.S. Department of Education – Carl D. Perkins Career and Technical Education Act

The purpose of this program is to develop more fully the academic knowledge and technical and employability skills of secondary education students and post-secondary education students who elect to enroll in career and technical education programs and programs of study.

Federal Migrant Programs

U.S. Department of Education Migrant Programs

Title I, Part C Program

Helps ensure that all migratory children reach challenging academic standards and graduate with a high school diploma (or complete a HSED) that prepares them for responsible citizenship, further learning, and productive employment.

High School Equivalency Program (HEP)

Helps migratory and seasonal farm workers (or immediate family members of such workers) who are 16 years of age or older and not currently enrolled in school to obtain the equivalent of a high school diploma and, subsequently, to gain employment or begin postsecondary education or training.

College Assistance Migrant Program (CAMP)

Assists students who are migratory or seasonal farmworkers (or immediate family members of such workers) enrolled in their first year of undergraduate studies at an institution of higher education (IHE).

Alaska institutions of higher education with CAMP programs:

- [University of Alaska Anchorage](http://uaa.alaska.edu/about/student-affairs/camp-program.cshtml) (uaa.alaska.edu/about/student-affairs/camp-program.cshtml)
- [University of Alaska Anchorage - Kenai Peninsula College](http://kpc.alaska.edu/admissions-aid/registration/camp-grant) (kpc.alaska.edu/admissions-aid/registration/camp-grant)
- [University of Alaska Anchorage - Kodiak College](http://koc.alaska.edu/programs/camp-grant.cshtml) (koc.alaska.edu/programs/camp-grant.cshtml)

U.S. Department of Health and Human Services Programs

- Migrant Health Program (MHP)
- Migrant and Seasonal Head Start Program (MSHS)

U.S. Department of Labor Migrant Programs

- National Farmworker Jobs Program (NFJP)

Interstate and Intrastate Coordination

It is a requirement that Title I-C funds are used to promote interstate and intrastate coordination of services to migratory children.⁸⁶ This effort must include, but is not limited to, providing educational continuity through the timely transfer of pertinent school records, including health information, when children move from one school to another, and whether such moves occur during the regular school year. Interstate and intrastate coordination helps reduce the effects of educational disruption that migratory children experience as a result of repeated moves.

Interstate coordination refers to collaborative activities undertaken by two or more States to improve the education of migratory children in those States. Ideally, this term refers to the collaborative activities that two or more States assume to improve the education of migratory children who move between those States. Intrastate coordination refers to efforts involving two or more districts within a State to improve educational services to migratory children in that State.

Interstate and intrastate coordination strategies may include, but are not limited to, the following types of services between and among districts and States:

- Notifying "receiving" school districts about families of migratory children who have moved to those districts.
- Promoting the exchange of student educational records.
- Developing academic credit accrual and academic credit exchange programs.
- Collaborating in the development of summer-term project curriculum.
- Exchanging teachers and teaching materials.
- Exchanging information on health screenings and health problems that interrupt a student's education.

A State meets its requirements for student records transfer by participating in the Migrant Student Information Exchange (MSIX), the nationwide system administered by the U.S. Department of Education for linking and exchanging specified educational and health information for all migratory children. Regulations require states to collect, maintain, and submit to MSIX 76 Minimum Data Elements (MDEs) and otherwise exchange and use that information to facilitate enrollment, placement, and accrual of secondary credits towards graduation and Title I-C program participation.⁸⁷

Transfer of Student Records

Section 1304(b)(3) requires interstate and intrastate coordination by providing for educational continuity through the timely transfer of pertinent school records (including health information) when children move from one school to another, whether the move occurs during the regular school year.

The timely transfer of student records can be an effective means of reducing the effects of educational disruption on migratory children. It enables school officials (e.g., school registrars, teachers, and guidance counselors) to make appropriate decisions regarding a student's enrollment in school, grade placement, and academic plans (including, but not limited to, credit accrual and exchange).

Districts must request the records of eligible migratory children who arrive in their district and must transmit records of those migratory children who move out of their State or district to another location in a timely manner.

⁸⁶ ESEA, Section 1304(b)(3)

⁸⁷ 34 CFR § 200.85

Fiscal Management

Subgrants to School Districts

Below are brief descriptions of each of the sub-grants a district may receive through Title I-C. For more information regarding the applications, award determinations, and funding periods refer to the [Title I-C Spending Handbook](https://education.alaska.gov/ESEA/TitleI-C/docs/SpendingHandbook-TitleI-C.pdf) (education.alaska.gov/ESEA/TitleI-C/docs/SpendingHandbook-TitleI-C.pdf).

ESEA Consolidated Application

Each school district operating a local Title I-C program is funded by the Alaska Department of Education & Early Development (DEED) through a sub-granting process. The total amount allocated to applicants is based on the availability of Federal funds and on sub-granting factors determined by DEED. Title I-C subgrant funds are not guaranteed. School districts are authorized by DEED to expend Title I-C funds through the approval of grant applications called the ESEA Consolidated Grant Application.

DEED considers the following factors in determining sub-grants to school districts:

- The availability of other funds.
- The number of migratory eligible children served during the regular school year.
- The number of migratory eligible children who were not served.
- The number of migratory children served during the summer.
- The number of migratory children in grades 3-9 scoring below or far below proficient on at least one State summative assessment in ELA and mathematics.
- The number of migratory children meeting the priority for services (PFS) definition.
- Identification & recruitment needs based on the total number of eligible migratory children and youth.

Alaska Title I-C Literacy Grant

The Alaska Title I-C Literacy Grant is a supplemental Title I-C grant awarded to districts who choose to participate. The goal of this supplemental grant is to support districts in improving literacy with migratory children and their families. Family literacy nights are encouraged, as well as supporting literacy efforts of migratory children who are not yet in school and those who have dropped out of school.

DEED considers the following factors when determining the award amount:

- how many districts applied, and
- the estimated number of migratory eligible children that will be participating (taken from a district's submitted application).

State Parent Advisory Council (PAC)

The Alaska Title I-C State Parent Advisory Council meets annually and is comprised of members from six (6) regions in Alaska. The council helps DEED develop, implement, and review plans for the State Title I-C program.

DEED considers the approximate number of in-person meetings and the distance which the PAC representative would have to travel to attend the meetings when determining the allocation amount for each grant.

General Spending Considerations

All Federal Funds

There are three general issues that affect districts spending Federal funds.

First, all costs charged to U.S. Department of Education (USED) grants must be **necessary and reasonable** considering the amount of money being spent and the needs of the program.⁸⁸ This requirement comes from a set of Federal regulations known as the Uniform Grant Guidance (UGG), which applies to all Federal grants including ED grants.⁸⁹

UGG affects ED grant spending in several ways. The Uniform Grant Guidance (UGG):

- **lists costs that may never be paid for with Federal funds.**⁹⁰ For example, Federal funds can never pay for alcohol⁹¹ and typically cannot pay for lobbying.⁹²
- **lists general criteria all costs supported with Federal funds must satisfy.**⁹³ For example, Federal funds can only pay for costs that are allocable to the relevant grant.⁹⁴
- **sets additional requirements for certain costs supported with Federal funds.**⁹⁵ For example, districts that use Federal funds for employee salaries and benefits must keep records documenting how much time the employees spend on grant activities.⁹⁶
- **sets rules for how districts procure goods and services** with Federal funds,⁹⁷ how they **track items** paid for with Federal funds,⁹⁸ and the **kinds of records** they must keep about their grant spending.⁹⁹

Second, activities supported by ED funds must be **consistent with the district's application** for funds approved by DEED.¹⁰⁰

Third, as discussed throughout this document, some ESSA programs require districts to spend on activities that are supported by evidence, are demonstrated to be effective, or that are consistent with a formal needs assessment. Even where this is not required, ED grant spending has the most impact when districts spend Federal funds on effective activities designed to meet program goals. To do this, districts are encouraged to:

- carefully consider the needs of students, educators, and other relevant stakeholders,
- determine which activities are most likely to effectively address those needs, and
- prioritize those activities when deciding what costs to support with ESSA funds (unless those activities are being paid for by other funding sources).

Visit DEED's [Federal Grants Management webpage](https://education.alaska.gov/grants/fed-grants) (education.alaska.gov/grants/fed-grants) for more information.

⁸⁸ 2 CFR 200.403(a)

⁸⁹ The Uniform Grant Guidance (UGG) is contained in Part 200 of Title 2 of the [Code of Federal Regulations](https://www.ecfr.gov/) (ecfr.gov). U.S. Department of Education's [Technical Assistance for ED Grantees](https://ed.gov/policy/fund/guid/uniform-guidance) (ed.gov/policy/fund/guid/uniform-guidance) contains more Federal guidance and other resources about the UGG.

⁹⁰ See 2 CFR Part 200, Subpart E

⁹¹ 2 CFR § 200.423

⁹² 2 CFR § 200.450

⁹³ See 2 CFR § 200.403

⁹⁴ 2 CFR § 200.403(a)

⁹⁵ See 2 CFR §§ 200.420-200.475

⁹⁶ 2 CFR § 200.430

⁹⁷ 2 CFR §§ 200.317-200.326

⁹⁸ 2 CFR §§ 200.313-200.314

⁹⁹ See, for example, 2 CFR § 200.318(h)(i) for procurement records or 2 CFR § 200.302(b)(3) for financial records.

¹⁰⁰ 34 CFR § 76.700

Title I-C Funds

Determining Allowability

When determining if Title I-C funds may be used to support a particular activity or service, the district must determine the following:

1. the activity or service comports with the results of the State's [Comprehensive Needs Assessment](https://education.alaska.gov/ESEA/TitleI-C/docs/cna_final_report.pdf) (education.alaska.gov/ESEA/TitleI-C/docs/cna_final_report.pdf) and the strategies outlined in the State's [Service Delivery Plan](https://education.alaska.gov/ESEA/TitleI-C/docs/migrant_service_delivery_plan.pdf) (education.alaska.gov/ESEA/TitleI-C/docs/migrant_service_delivery_plan.pdf);¹⁰¹
2. the Title I-C funds must first be used to meet the identified needs of migratory children that result from their migratory lifestyle, and to permit these children to participate effectively in school;¹⁰²
3. the activity or service meets the needs of migratory children that are not addressed by services available from other Federal or non-Federal programs;¹⁰³
4. the Title I-C funds are used to supplement, rather than supplant, the use of non-Federal funds;¹⁰⁴ and
5. the costs of the service or activity must comport with the cost principles described in the Uniform Grant Guidance (2 CFR Part 200). The cost principles require, among other things, that costs of the service or activity be reasonable, necessary, and allocable (or chargeable) to the Title I-C program relative to the benefit received.¹⁰⁵

In terms of numbers 3 and 4 in the list above, documentation of efforts to investigate non-Title I-C resources are important for quality control. It also serves as evidence of compliance with the statute in case of a State or Federal monitoring or audit. For example, if speaking with service agencies, another Federal Program Coordinator, or district officials, be sure to document the name and title of individuals spoken with and the date of the conversation.

Supplement, Not Supplant and Unaddressed Needs

Supplement, not supplant, means that funds must be used to provide extra support or services. ESEA specifically applies the following rule to Title I-C funds: all Federal funds under this program shall supplement and not supplant all other non-Federal funds.¹⁰⁶ The Title I-C statute makes it clear that **Title I-C services are in addition to, not in lieu of**, other services that can or should be provided by the core educational program or by any other program.

Each of the instructional services provided with Title I-C funds must be supplemental to the core instruction provided by a district, and whenever possible, should NOT occur during the regular school day. If services are provided during the school day, the district must document the supplemental nature of those services.

The Title I-C statute also requires that Title I-C funds be used to address the needs of migratory children that are not addressed by services available from other Federal or non-Federal programs.¹⁰⁷ This is very similar to the supplement, not supplant rule, but it applies to services funded by Federal or non-Federal programs. In essence, it means that if there are other services available that address the needs of migratory children (including services provided with Title I- A or Title III funds), then **migratory children must be**

¹⁰¹ ESEA, Section 1306(a)

¹⁰² ESEA, Section 1306(b)(1)

¹⁰³ ESEA, Section 1306(b)(2)

¹⁰⁴ 34 CFR § 200.87

¹⁰⁵ 2 CFR § 200

¹⁰⁶ 34 CFR § 200.87

¹⁰⁷ ESEA, Section 1306(b)(2)

selected for, and provided those services, on the same basis as other eligible children—prior to applying Title I-C funds.

For more information, refer to the DEED reference brief on [ESEA Supplement Not Supplant Requirements](https://education.alaska.gov/ESEA/documents/ESEA%20SNS%20Requirements.pdf) (education.alaska.gov/ESEA/documents/ESEA%20SNS%20Requirements.pdf).

ESEA Compliance Monitoring

Districts' ESEA grants are monitored through the Federal programs monitoring process. DEED utilizes a risk assessment to determine the districts monitored each year. During the monitoring visit, the Title I-C program manager reviews the Title I-C program, and a separate DEED Title I-C staff member provides a technical assistance visit with the district records manager.

Common documents that could be requested during the monitoring and technical assistance visits are:

- Identification & Recruitment Plan
- Quality Control Plan
- Evaluations of individual recruiters
- ID&R Resources (e.g., questionnaires, flyers)
- Official copies of COEs and COE Recerts from the past 10 years
- Student Records Transfer Forms
- Evidence of Parent and Family Engagement and Consultation (e.g., communication, flyers, agendas, sign-in sheets, notes)
- Local written Needs Assessment
- Local written Service Delivery Plan
- Local Title I-C program evaluation
- Staff schedules and assignments
- Local cost allowability written procedures
- Evidence of services provided to migratory children and how services are tracked
- Title I-C funded contracts
- Migratory children and youth data
- Title I-C consolidation documentation (if applicable)

The current ESEA Monitoring Form can be found on DEED's [Forms page](https://education.alaska.gov/forms) (education.alaska.gov/forms).

For more information about technical assistance visits, refer to the [Technical Assistance Visit](#) (page 87) and [Technical Assistance Preparation Checklist](#) (page 183) sections.

Title I-C Reporting

Refer to the [Title I-C Reporting](#) section starting on page 97 for detailed information regarding each Title I-C report. Refer to the [Sample Title I-C Reports](#) section starting on page 175 for examples of each Title I-C report.

Resources

Alaska Resources

- [Alaska Title I-C Website](https://education.alaska.gov/ESEA/TitleI-C) (education.alaska.gov/ESEA/TitleI-C)
- [Fall Training Resources](https://livebinders.com/play/play?id=2029583) (livebinders.com/play/play?id=2029583)
- Alaska Guidance Documents
- [Title I-C Spending Handbook](https://education.alaska.gov/ESEA/TitleI-C/docs/SpendingHandbook-TitleI-C.pdf) (education.alaska.gov/ESEA/TitleI-C/docs/SpendingHandbook-TitleI-C.pdf)
- [Needs Assessment](https://education.alaska.gov/ESEA/TitleI-C/docs/NeedsAssessmentGuidanceTitleI-C.pdf) (education.alaska.gov/ESEA/TitleI-C/docs/NeedsAssessmentGuidanceTitleI-C.pdf)
- [Provision of Services](https://education.alaska.gov/ESEA/TitleI-C/docs/ProvisionofServicesGuidanceTitleI-C.pdf) (education.alaska.gov/ESEA/TitleI-C/docs/ProvisionofServicesGuidanceTitleI-C.pdf)
- [Program Evaluation](https://education.alaska.gov/ESEA/TitleI-C/docs/ProgramEvaluationGuidanceTitleI-C.pdf) (education.alaska.gov/ESEA/TitleI-C/docs/ProgramEvaluationGuidanceTitleI-C.pdf)
- [Parent Engagement](https://education.alaska.gov/ESEA/TitleI-C/docs/ParentEngagementGuidanceTitleI-C.pdf) (education.alaska.gov/ESEA/TitleI-C/docs/ParentEngagementGuidanceTitleI-C.pdf)
- [District Level Guiding Documents Template](https://education.alaska.gov/ESEA/TitleI-C/docs/District-Level-Guiding-Template.docx) (education.alaska.gov/ESEA/TitleI-C/docs/District-Level-Guiding-Template.docx)
- [Alaska Statutes](https://akleg.gov/basis/statutes.asp#14) (akleg.gov/basis/statutes.asp#14)
- [Alaska Administrative Code](https://akleg.gov/basis/aac.asp#4) (akleg.gov/basis/aac.asp#4)

Federal Resources

Statute

- [Every Student Succeeds Act \(ESSA\) \(Section 1301-1309\)](https://govinfo.gov/content/pkg/COMPS-748/pdf/COMPS-748.pdf) (govinfo.gov/content/pkg/COMPS-748/pdf/COMPS-748.pdf)

Regulations

- [Title I-C Regulations \(34 CFR Part 200.81-200.89\)](https://ecfr.gov/current/title-34/subtitle-B/chapter-II/part-200/subpart-C) (ecfr.gov/current/title-34/subtitle-B/chapter-II/part-200/subpart-C)
- [Education Department General Administrative Regulations \(EDGAR\) \(34 CFR Part 75-99\)](https://ecfr.gov/current/title-34/subtitle-A) (ecfr.gov/current/title-34/subtitle-A)
- [Uniform Grant Guidance \(UGG\) \(2 CFR Part 200\)](https://ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200) (ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200)
- [Family Education Rights and Privacy Act \(FERPA\)](https://studentprivacy.ed.gov/ferpa) (studentprivacy.ed.gov/ferpa)

Guidance

- [Title I-C Non-Regulatory Guidance](https://ed.gov/sites/ed/files/2020/07/MEP-Non-Regulatory-Guidance-March-2017.docx) (ed.gov/sites/ed/files/2020/07/MEP-Non-Regulatory-Guidance-March-2017.docx)

Federal Office of Migrant Education Websites

- [Office of Migrant Education](https://ed.gov/about/ed-offices/oese/office-of-migrant-education) (ed.gov/about/ed-offices/oese/office-of-migrant-education)
- [Migrant Education Basic State Formula Grants](https://ed.gov/grants-and-programs/formula-grants/formula-grants-special-populations/migrant-education-program-title-i-part-c-state-grants) (ed.gov/grants-and-programs/formula-grants/formula-grants-special-populations/migrant-education-program-title-i-part-c-state-grants)

Glossary

Acronyms and Abbreviations

Acronym	Meaning
AKSID	Alaska Student ID
CFR	Code of Federal Regulations
CNA	Comprehensive Needs Assessment
CH	Course History
COE	Certificate of Eligibility
COE Recert	Certificate of Eligibility Recertification
COS	Continuation of Services
DEED	Alaska Department of Education & Early Development
EB	Ethnic Breakdown
ED	US Department of Education
EL	English Learner
EOE	End of Eligibility
ESEA	Elementary and Secondary Education Act
ESSA	Every Student Succeeds Act
FERPA	Family Education Rights and Privacy Act of 1974
FRR	Fall Recruitment Report
FSI	Fidelity of Strategy Implementation
FY	Fiscal Year
GED	General Education Diploma
GR	Grade
GPRA	Government Performance and Result Act
ID&R	Identification and Recruitment
IEP	Individualized Education Program
IM	Immunizations Records
MA	Medical Alert
MB	Multiple Birth
MDEs	Minimum Data Elements
MEO	Migrant Education Office at the State of Alaska, DEED
MEP	Migrant Education Program
MPO	Measurable Program Outcomes
MSIX	Migrant Student Information Exchange
MW	Mass Withdrawal
NRG	Non-Regulatory Guidance
OME	U.S. Department of Education's Office of Migrant Education
OSY or OY	Out of School Youth
PAC	State Parent Advisory Council
PFS	Priority for Services
QAD	Qualifying Arrival Date
RES	Residency Date
RM	Records Manager
SDP	Service Delivery Plan
SEA	State Education Agency
SP	Supplemental Programs
SSR	Summer Services Report
TA	Technical Assistance
VER	Birth Date Verification Code

Definitions

Word	Definition	Reference, if applicable
Activities	Activities related to identification and recruitment, parental involvement, program evaluation, professional development, or administration of the program are examples of allowable activities that are not considered services.	
Active/Accepted COE	A COE is active/accepted when the COE has been reviewed and all children on the COE are deemed eligible by DEED.	
Actively Sought	The individual takes positive actions to seek new qualifying work. The process of actively seeking new qualifying work should happen within 60 days of the move. Actively sought is not actual engagement in qualifying work.	NRG, Chapter II, C10
Agricultural Production	Work done at facilities engaged in the growing and harvesting of crops or the keeping of livestock.	NRG, Chapter II, F1
Agricultural Work	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.	34 C.F.R. §200.81(a)
Alaska Migrant Web System	The Alaska Migrant Web System is a secure website utilized in several ways to help streamline Alaska's Migrant Education Program. Listed below are some of the applications of the Alaska Migrant Web System: • A secure transmission portal of migratory children and youth data between recruiters, records managers and DEED. • A recruiting tool for recruiters and records manager to use to complete a COE and submit it to the district migratory database, MIS2000 • A generator of migratory children and youth reports	
Allocation	Amount of Title I-C funds given by the Alaska Department of Education & Early Development to an eligible school district. The funds are based on a formula and the child count generated by that district.	
Annual Verification	The State of Alaska requires all migratory children to be contacted each year for verification of eligibility in the Title I-C program.	
As the Worker Move	The child is at least 14 years of age and made a qualifying move as a migratory fisher or migratory agricultural worker.	
Canceled COE	The status of a COE which, for a variety of factors, DEED has found the children to not be eligible for the Title I-C program. There are several reasons for cancelling a COE including: move was too short in length, the family did not travel far enough, no economic necessity indicated, etc. Canceled COEs will be deleted from MIS2000 soon after they have been deemed ineligible.	
Certificate of Eligibility (COE)	A form adopted by the U.S. Department of Education and the Alaska Title I-C program that is used to document a child's eligibility. The COE contains the information needed to certify a child as eligible for the Title I-C program.	
Certificate of Eligibility Recertification (COE Recert)	The form used to recertify eligible migratory children in the recruiter's district who have not made any additional qualifying moves since the last interview. A Certificate of Eligibility Recertification (COE Recert) recertifies a child's eligibility in the recruiter's district.	

Word	Definition	Reference, if applicable
Continuation of Services (COS)	School districts may choose to offer services to migratory children whose eligibility has ended under the following conditions: • a child who ceases to be a migratory child during a school term shall be eligible for services until end of such term; • a child who is no longer a migratory child may continue to receive services for one additional school year, but only if comparable services are not available through other programs; and • children who are eligible for services in secondary school may continue to be served through credit accrual programs until graduation.	§1304(c) of ESEA, as amended
Course History	As part of the minimum data elements (MDEs) required by OME, districts report course history information on their migratory children in grades 9-12, three times a year. This information is uploaded to MIS2000.	
Crop	A plant that is harvested for use by people or by livestock.	NRG, Chapter II, F3
Cultivation of Trees	Work that promotes the growth of trees.	NRG, Chapter II, F9
Designated SEA Reviewer	The staff member at the district office that has agreed to be the district's final reviewer on all COEs.	
Emancipated Youth	Children who have not yet reached adult age who are no longer under the control of a parent/guardian and who are solely responsible for their own welfare.	NRG, Chapter II, A6
Economic Necessity	The child and the worker (if the child is not the worker) moved because they could not afford to stay in the current location.	NRG, Chapter II, D3
Emancipated Youth	Children who have not yet reached adult age who are no longer under the control of a parent/guardian and who are solely responsible for their own welfare.	NRG, Chapter II, A6
Engaged In	To do or take part in new temporary or seasonal employment or personal subsistence in agricultural or fishing work.	
Enroll Date	The first day the child attends school in the recruiter's district after making a qualifying move for the current school year.	
End of Eligibility Date (EOE)	Also called the EOE, this date is three years (36 months) from a migratory child's most recent Qualifying Arrival Date. After this date, a child is no longer eligible for the Title I-C program and Title I-C services, unless they make another qualifying move.	
ESEA Consolidated Application	A single, consolidated application for all ESEA formula entitlements, including the following titles: Title I-A, Title I-C, Title I-D, Title II-A, Title III-A, and Title IV-A. The consolidated application is completed using an electronic web-based application, known as GMS.	
Extended Move (30 days or more)	The comment required when the move listed in question 1 or question 4 of the Qualifying Moves & Work section is more than 30 days long. When this occurs, the recruiter must verify the length of time the migratory worker was engaged in the qualifying work.	
Fall Recruitment Report (FRR)	This report is a list of the eligible migratory children in a district from the previous school year (and those who have EOE'd since the previous school year). This report serves as a "to do" list for the district at the start of the school year. The district must contact all children and families on the list prior to the November 15 th recruitment deadline.	

Word	Definition	Reference, if applicable
FERPA	The Family Education Rights and Privacy Act (FERPA) is a Federal law that protects the privacy of student education records.	20 U.S.C §1231(g) & 34 C.F.R §99
Fishing Work	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.	34 C.F.R. §200.81(c)
Fish Farm	A tract of water, such as a pond, a floating net pen, a tank, or a raceway reserved for the raising or harvesting of fish or shellfish. Large fish farms sometimes cultivate fish in the sea, relatively close to shore. The fish are artificially cultivated, rather than caught, as they would be in fishing.	NRG, Chapter II, F17
Grants Management System (GMS)	The electronic web-based grants management system used for the ESEA Consolidated Grant application and reimbursement requests.	
Guardian	Any person who stands in the place of the child's parent, <i>in loco parentis</i> , whether by voluntarily accepting responsibility for the child's welfare or by a court order.	NRG, Chapter II, B2
Guardian Move	Type of qualifying move where the migratory worker is not the children's parent and/or legal guardian. The migratory worker is the guardian of the children during the move only. The guardian must be 14 years or older. The qualifying move must be an economic need for the child(ren)'s primary household. If applicable, the subsistence must go back to support the child(ren)'s primary household.	
Harvesting of Trees	The act of gathering or taking of the trees. Some examples of harvesting are: topping, felling, and skidding. This does not include harvesting for personal use.	NRG, Chapter II, F13-F14
Identification	Determining the location and presence of potentially eligible migratory children.	NRG, Chapter III, A1
ID&R Plan	A document that establishes an identification and recruitment process for a district- level Title I-C program that encompasses training of staff, identifying potential children, and effective recruitment.	
Individualized Education Program (IEP)	A written document required for each child who is eligible to receive special education services that is developed, reviewed, and revised in an annual meeting.	34 C.F.R. §300.22 & §300.320
Initial Processing	Work that is beyond the production stage of agricultural work and precedes the transformation of the raw product into something more refined.	NRG, Chapter II, F 20
Instructional Service	Services that provide evidence-based instruction to migratory children.	
Literacy Grant	The Alaska Department of Education & Early Development's Title I-C Literacy Grant is a grant-based program for the purchase of literary materials for migratory children. Allocation size depends on the number of qualifying migratory children served by the district.	
Literacy Grant Final Report	This report is for districts that choose to participate in the Title I-C Literacy Grant. The report describes what a district did with its literacy grant funds.	
Livestock	Any animal produced or kept primarily for breeding or slaughter purposes, including, but not limited to, beef cattle, hogs, sheep, goats, and horses.	NRG, Chapter II, F6

Word	Definition	Reference, if applicable
Local Education Agency (LEA)	The local agency responsible for the implementation of program services to identify eligible migratory children. In Alaska, this is usually the school district.	
Mass Withdrawal (MW) Report	The end of school year report provided to district records managers. The records manager reports the supplemental program services received by migratory children during the school year on this report. This report also allows DEED to withdraw all migratory children from the program at the end of the school year.	
Measurable Program Objectives (MPOs)	Measurable outcomes are the results the Title I-C program hopes to achieve at the State and district levels through the provision of specific educational or educationally related services. Measurable outcomes help the Title I-C program determine whether and to what degree it has met the unique educational needs of migratory children that the SEA identified through the comprehensive needs assessment. The measurable outcomes at both the State and districts help migratory children achieve the State's performance targets.	NRG, Chapter VIII, B1, 4 §1306(a)(1)
Migratory Agricultural Worker	An individual who made a qualifying move in the preceding 36 months and, after doing so, engaged in new temporary or seasonal employment or personal subsistence in agriculture, which may be dairy work or the initial processing of raw agricultural products. If an individual did not engage in such new employment soon after a qualifying move, such individual may be considered a migratory agricultural worker if the individual actively sought such new employment and has a recent history of moves for temporary or seasonal agricultural employment.	§1309(2) of ESEA, as amended
Migratory Child	A child or youth under the age of 20 (22 with an active IEP) who made a qualifying move in the preceding 36 months— • as a migratory agricultural worker or a migratory fisher; or • with, or to join, a parent/guardian or spouse who is a migratory agricultural worker or a migratory fisher.	§1309(3) of ESEA, as amended
Migratory Fisher	An individual who made a qualifying move in the preceding 36 months and, after doing so, engaged in new temporary or seasonal employment or personal subsistence in fishing. If the individual did not engage in such new employment soon after the move, the individual may be considered a migratory fisher if the individual actively sought such new employment and has a recent history of moves for temporary or seasonal fishing employment.	§1309(4) of ESEA, as amended
Migratory Worker	Shortened term for migratory agricultural worker or migratory fisher.	
Minimum Data Elements (MDE)	States are required to collect and report minimum data elements (MDEs) to the U.S. Department of Education – Office of Migrant Education (OME). MDEs are data elements that states must collect and maintain in their migratory children and youth databases (i.e., MIS2000) for each of their eligible migratory children to make those data available to other states via the national migratory student database, MSIX.	
MIS2000	The Alaska Migrant database. All Title I-C eligibility information, as well as all MDEs required for the program are entered, stored, and reported through this database.	
Missing Eligible Report	A report that lists the children in the district that still have migratory eligibility but were not recertified for the current school year. This report is useful to districts after fall recruitment is over. DEED can run the missing eligible child list for the district upon request.	

Word	Definition	Reference, if applicable
Monitoring	A review of fiscal and program records to determine if those activities are in compliance with federal and state regulations and in conjunction with the district application.	
Move	A change from one residence to another that occurs due to an economic necessity.	34 C.F.R. §200.81(j)
MSIX	The Migrant Student Information Exchange (MSIX) system is the technology that allows states to share educational and health information on migratory children who travel from state to state and who, as a result, have student records in multiple states' information systems. MSIX works in concert with the existing migratory child information systems that states currently use (MIS2000 in Alaska) to manage their Title I-C data to fulfill its mission to ensure the appropriate enrollment, placement, and accrual of credits for migratory children nationwide.	
Needs Assessment	A needs assessment is a systematic assessment and decision-making process that progresses through a defined series of phases to determine needs, examine their nature and causes, and set priorities for future action.	NRG, Chapter III, A2
Not Yet in School	A child who is usually under the age of 5 and has not yet enrolled in any school. These children will have a grade listed on the COE as 00.	
Out of School Youth (OSY/OY)	Children under the age of 20 who are entitled to free public education in the State and who meet the definition of migratory child, but who are not currently enrolled in a K-12 institution. This term could include children who have dropped out of school or youth who are working on a high school equivalency diploma (GED). This term would not include children in preschool, or children not yet old enough to be enrolled in school	NRG, Chapter II, A5
Parent Advisory Council (PAC)	A council comprised of parents of migratory children representing all regions of the state to provide a means for community and parent input during the planning, operation and evaluation of a Title I-C program project.	
Parent/Guardian	The legal guardian or other person standing in <i>loco parentis</i> (such as a grandparent, stepparent, aunt or uncle, older sibling with whom the child lives, or a person who is legally responsible for the welfare of the child).	NRG, Chapter II, B2
Permanent Move	A move into a new district, where the family intends to remain and live indefinitely. This move could be made by the child individually, to attend school in another school or district (i.e., Mt. Edgecumbe, Galena, etc.)	
Personal Subsistence	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.	34 C.F.R. §200.81(m)
Priority for Services (PFS)	A term used to identify children in greatest need of Title I-C services. In providing services with Title I-C funds, the district shall give priority to migratory children who have made a qualifying move within the previous 1-year period and who— (1) are failing, or most at risk of failing, to meet the challenging State academic standards; or (2) have dropped out of school.	§1304(d) of ESEA, as amended

Word	Definition	Reference, if applicable
Production (Agricultural)	Work on farms, ranches, dairies, orchards, nurseries, and greenhouses engaged in the growing and harvesting of crops, plants, or vines and the keeping, grazing or feeding of livestock or livestock products for sale. The term also includes, among other things, the production of bulbs, flower seeds, vegetable seeds, and specialty operations such as sod farms, mushroom cellars, and cranberry bogs.	NRG, Chapter II, F2
Qualifying Arrival Date (QAD)	The date the child and the migratory agricultural worker or migratory fisher (if the child is not the worker) complete a qualifying move to be together. If the child and the worker move at the same time, the QAD is the date they both arrive. If the child's move precedes the worker's move, the QAD is the date that the worker arrived. If the child's move follows the worker's move, the QAD is the date the child arrived.	NRG, Chapter II, E1 & E3
Qualifying Move	A move due to economic necessity— 1. from one residence to another residence; and 2. from one school district to another school district, except— • in the case of a State that is comprised of a single school district, wherein a qualifying move is from one administrative area to another within such district; or • in the case of a school district of more than 15,000 square miles, wherein a qualifying move is a distance of 20 miles or more to a temporary residence.	§1309(5) of ESEA, as amended
Qualifying Work	Temporary or seasonal employment, or personal subsistence in agricultural work or fishing work.	34 C.F.R. §200.81(n)
Quality Control Plan	A document that establishes a quality control process for ensuring the integrity and accuracy of the identification and recruitment policies and procedures of a district-level Title I-C program.	
Records Manager (RM)	The district-level staff member assigned the responsibility of collecting and reporting all pertinent migratory child data in a timely basis and transmitting such information to DEED through MIS2000.	
Recent History of Moves	At least 2 moves that resulted in temporary or seasonal agricultural or fishing employment or personal subsistence (i.e., qualifying work) within the preceding 36 months of the recruiter's interview.	NRG, Chapter II, C13-C17
Recruiter	The district-level staff member assigned to identify and recruit families of migratory children. This person usually conducts the parent interviews and completes the COEs. A recruiter's primary responsibilities are: 1. to obtain information provided by parents, guardians, and others regarding the child's eligibility for the Title I-C program; 2. to make initial determinations of eligibility; and 3. to accurately and clearly record information that establishes that a child is eligible for the Title I-C program on a COE or COE Recert form.	
Recruitment	The process of making contact with families of migratory children, explaining the Title I-C program, securing the necessary information to make a determination that the child is eligible for the Title I-C program, and recording the basis of the child's eligibility on a COE.	NRG, Chapter III, A1
Referred Service	Referred services are those provided to a migratory child by another agency through a referral by the Title I-C program (or Title I-C funded staff).	

Word	Definition	Reference, if applicable
Rejected COE	A COE is marked Rejected if more information is needed, this could be due to missing or inaccurate information on the COE. A rejected COE is only editable by the owner of the COE.	
Residence	A place where one lives and not just visits. In certain circumstances, boats, vehicles, tents, trailers, etc., may serve as a residence.	NRG, Chapter II, D2
Residency Date (RES)	The date the child establishes or reestablishes residency in the recruiter's district after the most recent qualifying move.	
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.	34 C.F.R. §200.81(o)
Service Delivery Plan (SDP)	Guiding document for the implementation of the Alaska Title I-C Program. It identifies performance targets, measurable program outcomes, service delivery, and evaluation.	
Snap Report: Approved COE Recerts List	Produces a list of migratory children who have approved COE Recertifications (COE Recerts) for the district based on the School Year provided. The list displays each child along with the COE Recert(s) that has been approved for them for the specified school year. This list only includes children that were recertified on a COE Recert and does not include children that were only on a new move COE.	
Snap Report: Approved COEs List	Produces a list of approved Certificates of Eligibility (COEs) for the district based on the School Year provided. The list includes the children on each COE and the date their COE was approved. Children must be certified on a COE for the current school year to be on this report. Children only recertified through a school history line/COE Recert will not be included.	
Snap Report: Certified & Recertified Migratory Children List	Produces a list of migratory children who have been certified, or recertified, on a new COE or COE recert based on the Start Date provided. This list excludes children who do not have an approved COE or COE Recert as of the Start Date provided, have graduated, moved, or are deceased. This report includes Priority for Services (PFS) status.	
Snap Report: Children Near End of Eligibility List	Produces a list of migratory children whose eligibility will end within 6 months of the date the report was pulled. This list includes children who are close to aging out or are approaching the end of their three-year eligibility period. The list excludes children who have reached the end of their three-year eligibility period, have graduated, aged out, or are deceased as of the date the report was pulled.	
Snap Report: Eligible Children Without An Enrollment List	Produces a list of eligible migratory children who have not been recertified on a COE or COE Recert for the School Year provided. The list excludes children who have reached the end of their three-year eligibility period, have graduated, aged out, or are deceased. This report is useful to districts for their fall count to find currently eligible migratory children who have not yet been recertified or approved on a new move COE.	
Snap Report: In Process COEs List	Produces a list of COEs that have been entered into MIS2000 but have not yet been approved by DEED (i.e., in process, incomplete status, new status, rejected status). Please note all canceled COEs will be deleted by DEED from MIS2000 at the beginning of the new school year, on or after July 1.	

Word	Definition	Reference, if applicable
Snap Report: Migrant Lunch List	Produces a list of all children with Qualifying Arrival Dates (QADs) within 36 months of the State Date provided, regardless of whether they have been certified or recertified on a new COE or COE Recert for the current school year. The list may include children who have graduated, aged out, or are deceased. The list includes children that the district did not recertify during the current or previous school year. This list contains all children recruited by the district who are within their three years of migratory eligibility as of July 1.	
Snap Report: MIS2000 School Names List	Produces a list of current schools in the district. Includes both the district's public-school names and the MIS2000 school names used when children are not enrolled in a district-operated public school.	
Snap Report: PDFs of Approved COEs	Produces PDF copies of all active/eligible COEs in the district based on the Start Date provided.	
Snap Report: Priority for Services (PFS)	Produces a list of migratory children who have been identified as Priority for Services (PFS) based on the School Year provided.	
Snap Report: Recently EOE'd Children List	Produces a list of children whose migratory eligibility ended within 12 months of the date the report was pulled. The list excludes children who have aged out, graduated from high school, or are deceased.	
Soon After the Move	Within 60 days after the qualifying move.	NRG, Chapter II, C5
Spouse	The husband or wife of the migratory child.	
State Education Agency (SEA)	The government agency responsible for statewide education program supervision and administration. The legal entity in each state recognized by the U.S. Department of Education as being the governing agency eligible to receive Title I-C funds and administer the Title I-C program.	
Summer Services Report (SSR)	This report is provided to districts who run a Title I-C funded summer program or provide Title I-C funded services, and it is very similar to the Mass Withdrawal Report. Title I-C funded supplemental services received during the summer are recorded on this report and returned to the DEED by September 30.	
Supplement, not Supplant	"Supplement, not supplant" is the phrase used to describe the requirement that Title I-C funds may be used only to supplement the level of funds that would, in the absence of Title I-C funds, be made available from non-Federal sources for the education of children participating in Title I-C projects. SEAs and LEAs may not use Title I-C funds to supplant (i.e., replace) non-Federal funds.	NRG, Chapter X, A1
Supplemental Program Services	Services provided to eligible migratory children. The supplemental program services are those educational or educationally related activities that: • directly benefit a migratory child; • address a need of a migratory child consistent with the state's comprehensive needs assessment and service delivery plan; • are evidence-based or, in the case of support services, are a generally accepted practice; and • are designed to enable the program to meet its measurable outcomes and contribute to the achievement of the state's performance targets.	

Word	Definition	Reference, if applicable
Support Service	Services to provide support and advocacy to migratory children.	
Technical Assistance (TA)	Individual identification and recruitment process and procedure training for Title I-C staff at each school district as needed. Need is determined by the district and DEED. Technical assistance is provided by the assigned ID&R specialist or Title I-C program manager. This assistance can be provided on site or through virtual means.	
Temporary Employment	Employment that is conducted for a limited time frame (usually only a few months, but no longer than 12 months).	34 C.F.R. §200.81(p)
Temporary Residence	A place where one lives and not just visits. It is expected that an individual would only live in temporary housing for a limited period of time, usually a few months, but no longer than 12 months.	
Title I-C Coordinator	The district-level staff member responsible for ensuring local quality control of the migratory identification, recruitment, and eligibility certification process. The coordinator also ensures that key tasks are completed by the deadline and may also develop a program plan or be involved with the federal grant application.	
To Join/Precede Worker	When the child and the migratory worker make the qualifying move listed in question 1 of the Qualifying Moves & Works section of the COE separately. The child's move may either precede or follow the worker's move. The date of the child's move must be within 12 months of the date the migratory worker's move. The QAD will be the date the child and the worker complete the move to be together.	

Appendix A: ID&R Resources

General Resources

Key Charts

Sex

Code	Definition
M	Male
F	Female

Multiple Birth (MB)

Code	Definition
Y	Yes (Twin, Triplet, or other Multiple Birth)
N	No (Single Birth)

Birth Date Verification Code

Code	Definition
1003	Baptismal or Church Certificate
1004	Birth Certificate
1005	Entry in Family Bible
1006	Hospital Certificate
1007	Parent's Affidavit
1008	Passport
1009	Physician's Certificate
1010	Previously Verified School Records
1011	State Issued ID
1012	Driver's License
1013	Immigration Document
2382	Life Insurance Policy
9999	Other

Ethnic Breakdown (EB)

Code	Definition
1	White (Caucasian)
2	Black or African American
3	Hispanic/Latino
4	Asian
5	American Indian
6	Alaska Native
7	Two or More Races
8	Native Hawaiian or Pacific Islander

Immunizations Records Flag (IM)

Code	Definition
Y	Yes (Immunizations Records on File at District)
N	No (Immunizations Records not on File at District)

Grade (GR)

Code	Definition
00	Not Yet in School
PS	Preschool
K	Kindergarten
1	First Grade
2	Second Grade
3	Third Grade
4	Fourth Grade
5	Fifth Grade
6	Sixth Grade
7	Seventh Grade
8	Eighth Grade
9	Ninth Grade
10	Tenth Grade
11	Eleventh Grade
12	Twelfth Grade
OY	Out of School Youth

Permanent Termination Codes (Term)

Code	Definition
D	Deceased
G	Graduated
Y	Aged Out

Temporary Termination Codes (Term)

Code	Definition
M	Moved
N	Parental Refusal
O	Dropped Out
U	Unreachable

Type of Enrollment (Type)

Code	Definition
R	Regular School Year
S	Summer Program

Medical Alert Indicator (MA)

Code	Definition
C	Chronic
A	Acute
N	None

State Abbreviation Key

State	Abbreviation
Alabama	AL
Alaska	AK
Arizona	AZ
Arkansas	AR
California	CA
Colorado	CO
Connecticut	CT
Delaware	DE
Florida	FL
Georgia	GA
Hawaii	HI
Idaho	ID
Illinois	IL
Indiana	IN
Iowa	IA
Kansas	KS
Kentucky	KY
Louisiana	LA
Maine	ME
Maryland	MD
Massachusetts	MA
Michigan	MI
Minnesota	MN
Mississippi	MS
Missouri	MO

State	Abbreviation
Montana	MT
Nebraska	NE
Nevada	NV
New Hampshire	NH
New Jersey	NJ
New Mexico	NM
New York	NY
North Carolina	NC
North Dakota	ND
Ohio	OH
Oklahoma	OK
Oregon	OR
Pennsylvania	PA
Rhode Island	RI
South Carolina	SC
South Dakota	SD
Tennessee	TN
Texas	TX
Utah	UT
Vermont	VT
Virginia	VA
Washington	WA
West Virginia	WV
Wisconsin	WI
Wyoming	WY

U.S. Districts & Territories Key

District or Territory	Abbreviation
American Samoa	AS
District of Columbia (Washington DC)	DC
Federated States of Micronesia	FM
Guam	GU
Marshall Islands	MH
Northern Mariana Islands	MP
Palau	PW
Puerto Rico	PR
Virgin Islands	VI

School District Boundaries

School Districts with an Area Less than 15,000 Square Miles

In all school districts which have an area less than 15,000 square miles, qualifying moves **must cross school district boundaries**.

Anchorage Annette Island Bristol Cordova Craig Delta-Greely Denali Dillingham Fairbanks Galena Haines	Hoonah Hydaburg Juneau Kake Kashunamiut Ketchikan Klawock Kuspuk Mt. Edgecumbe Nenana Nome	Pelican Petersburg Pribilof Saint Mary's Sitka Skagway Unalaska Valdez Wrangell Yupit
---	--	--

School Districts with an Area Greater than 15,000 Square Miles:

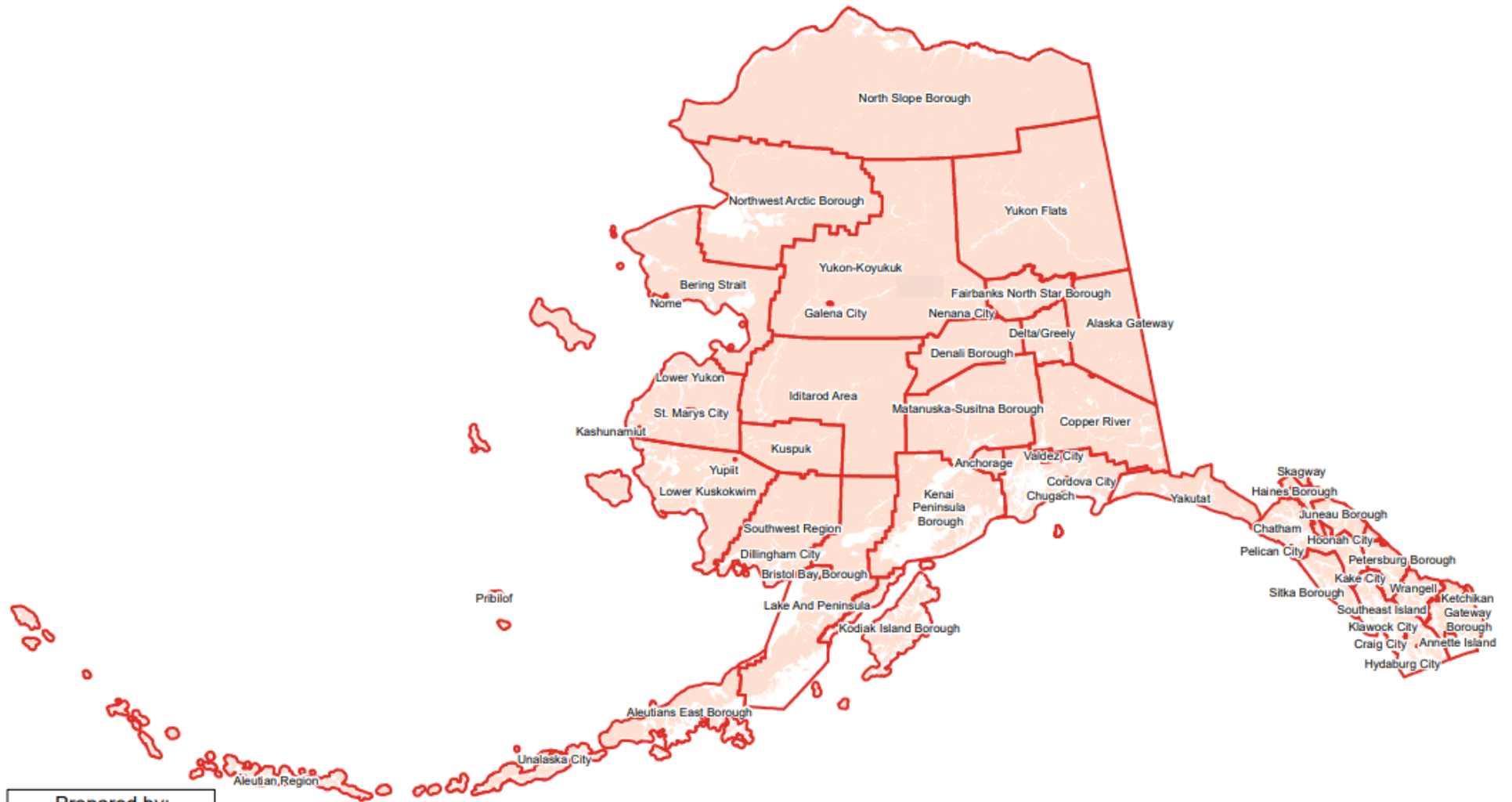
In districts greater than 15,000 square miles, a qualifying move **must cross district boundaries or be at least 20 miles, one way, to a temporary residence**.

Alaska Gateway Aleutian Region Aleutians East Bering Strait Chatham Chugach Copper River	Iditarod Kenai Kodiak Lake & Peninsula Lower Kuskokwim Lower Yukon Mat-Su	North Slope Northwest Arctic Southeast Island Southwest Region Yakutat Yukon Flats Yukon-Koyukuk
--	---	--

Further documentation for qualifying moves in districts with more than 15,000 square miles must be done during the interview process. **A map is required to document moves of 20 miles or more to a temporary residence.** The map must have a legend/scale for determining distance and must be attached to the original COE and be kept on file at the district office. For moves where distance of 20 miles is unclear, the map must show the start point, the end point, and the route taken.

Districts must adopt necessary procedures to ensure the validity of the qualifying move. On the COE, the specific geographic location of the most recent qualifying move must be listed to determine eligibility.

Alaska School District Map



Prepared by:
Alaska Department of
Labor & Workforce
Development

November 2022

Source: US Census
2020 TIGERLine

Alaska Schools & Education Map from the Alaska Community Database Online (CDO)

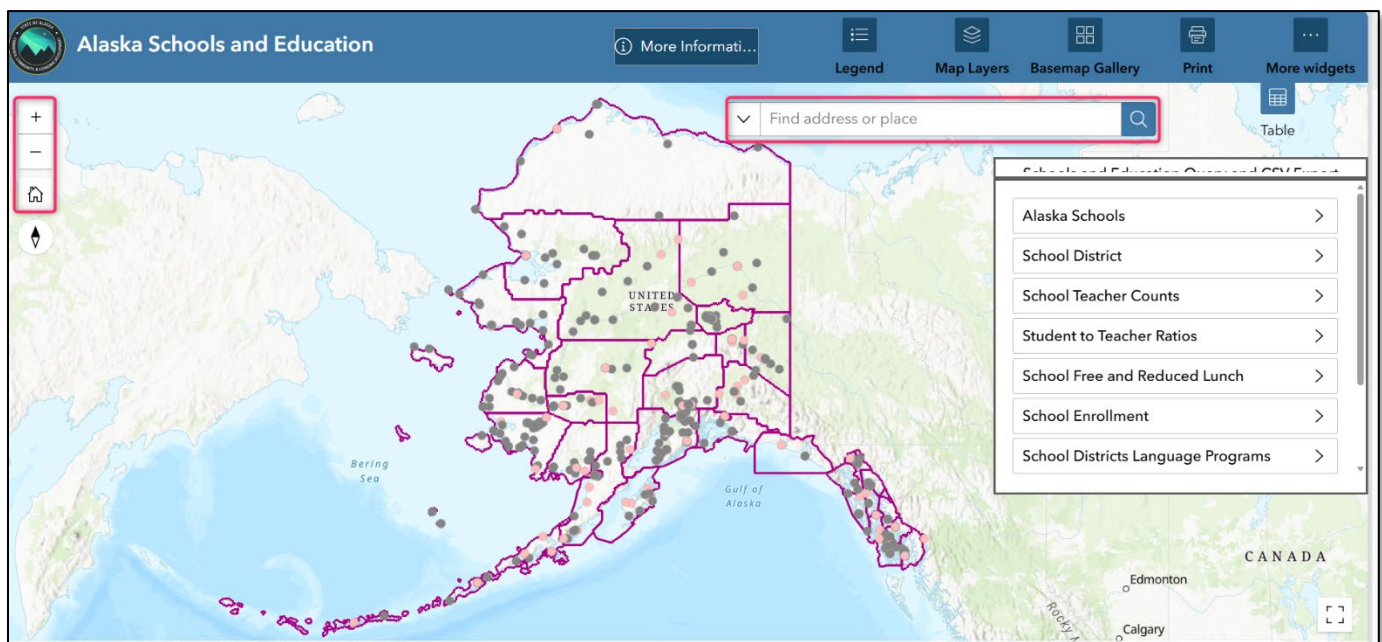
This map can be a useful tool during recruitment. Among its possible uses, it can generate maps to help determine whether moves made by potential migratory children and workers meet distance requirements. Below are instructions on how to find and use this resource.

To use this map, it is recommended to **use Google Chrome or Mozilla Firefox** as the Internet browser.

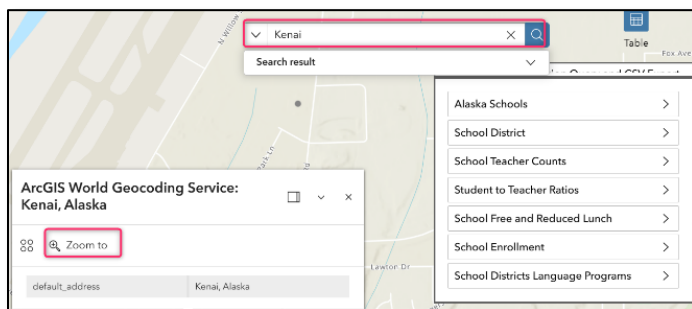
The [Alaska Schools & Education Map](http://dccc.maps.arcgis.com) (dccc.maps.arcgis.com) is part of the State of Alaska's [Community Database Online](http://dcra-cdo-dccc.opendata.arcgis.com) (dcra-cdo-dccc.opendata.arcgis.com), hosted by the [Division of Community and Regional Affairs](http://commerce.alaska.gov/web/dcra), (commerce.alaska.gov/web/dcra) within the [Department of Commerce](http://commerce.alaska.gov) (commerce.alaska.gov). This map shows all of Alaska's public school district boundaries, as well as the communities & schools within them.

By clicking on the link that leads directly to the [Alaska Schools & Education Map](http://dccc.maps.arcgis.com) (dccc.maps.arcgis.com), users can zoom in on the school district to start exploring. To measure distances between places, follow these steps:

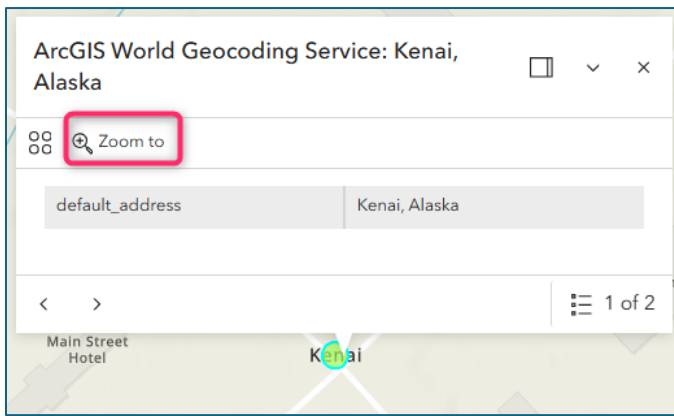
1. Navigate to/zoom in on the desired part of the map using the **PLUS + SIGN**, or
2. type in the desired location in the search bar and then hit enter. The map will automatically zoom into the chosen location.



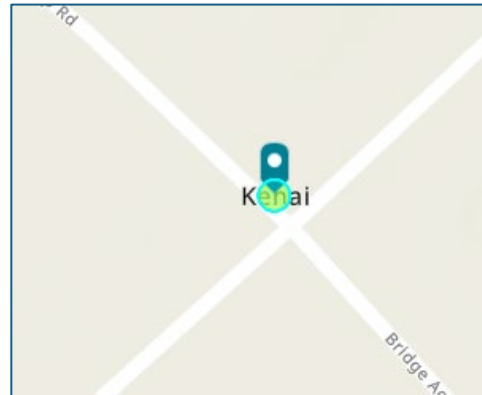
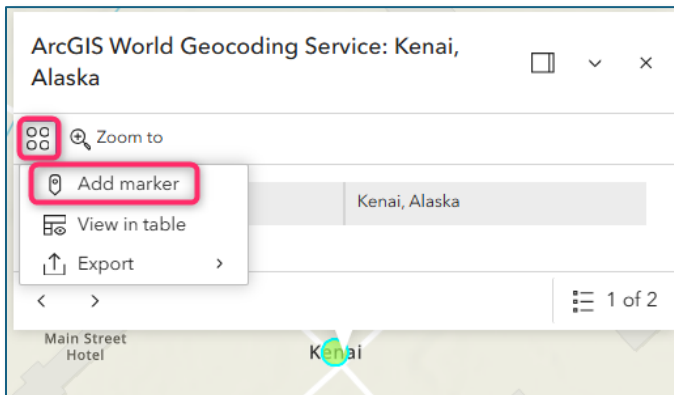
3. Click on the **Zoom to** button in the pop-up that appears to view the location up close



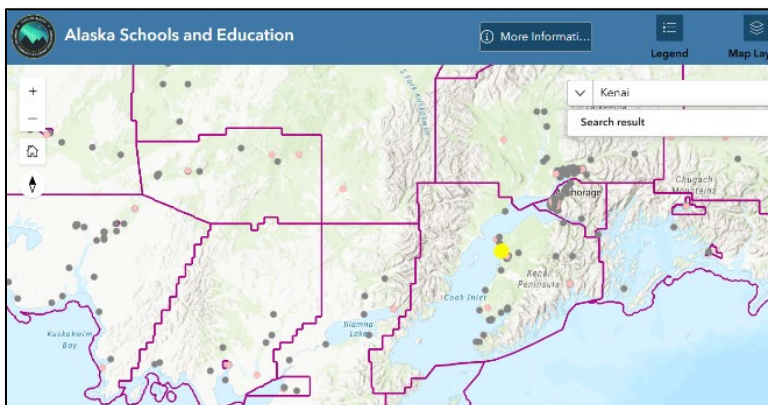
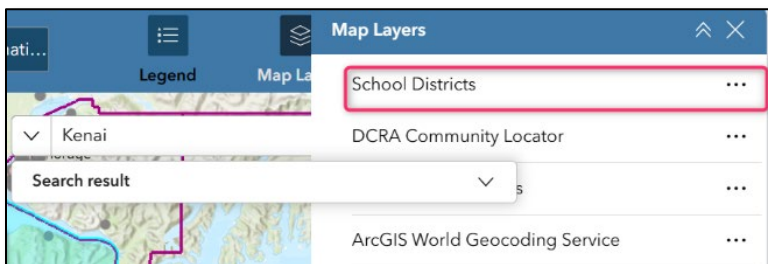
4. Alternatively, clicking on any location will also open a pop-up with an option to **Zoom to**.



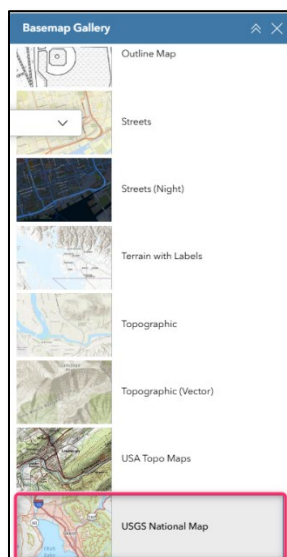
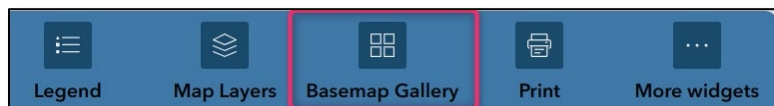
5. Click on the **ICON WITH FOUR CIRCLES**. Options will appear. Click **ADD MARKER**.



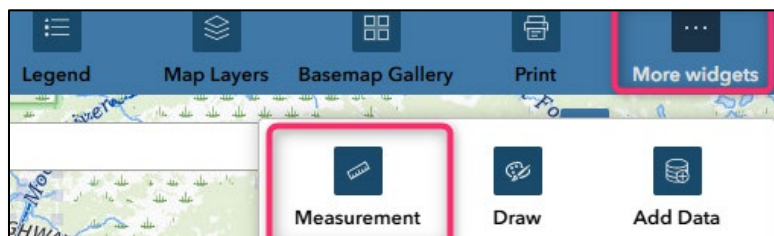
6. School district boundaries should be visible on the map. If they are not visible, click on **MAP LAYERS** and then select **SCHOOL DISTRICT** to show school district boundaries on the map.



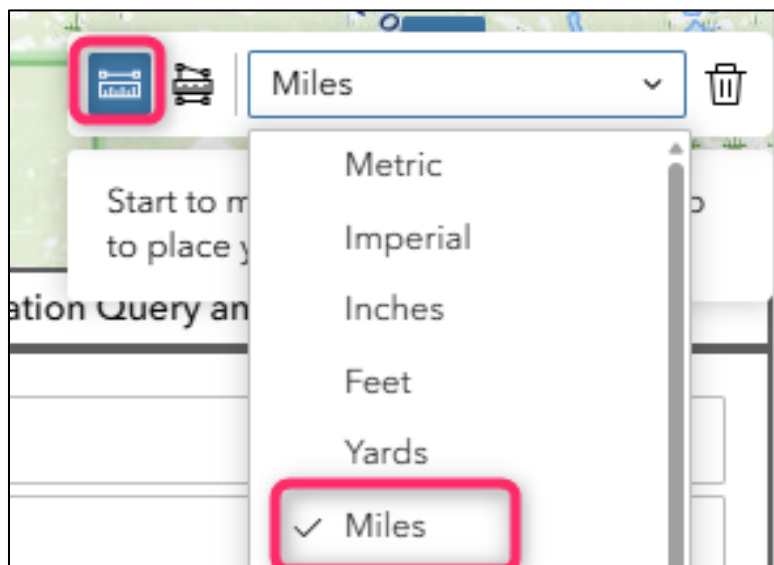
7. Next, click on **BASEMAP GALLERY** and choose the desired basemap. Using the **USGS NATIONAL MAP** is recommended because it will show more defined geographical features, such as rivers, lakes, and mountains.



8. In the window that opens, click on **MORE WIDGETS** on the right-hand side of the window and select **MEASUREMENT**.

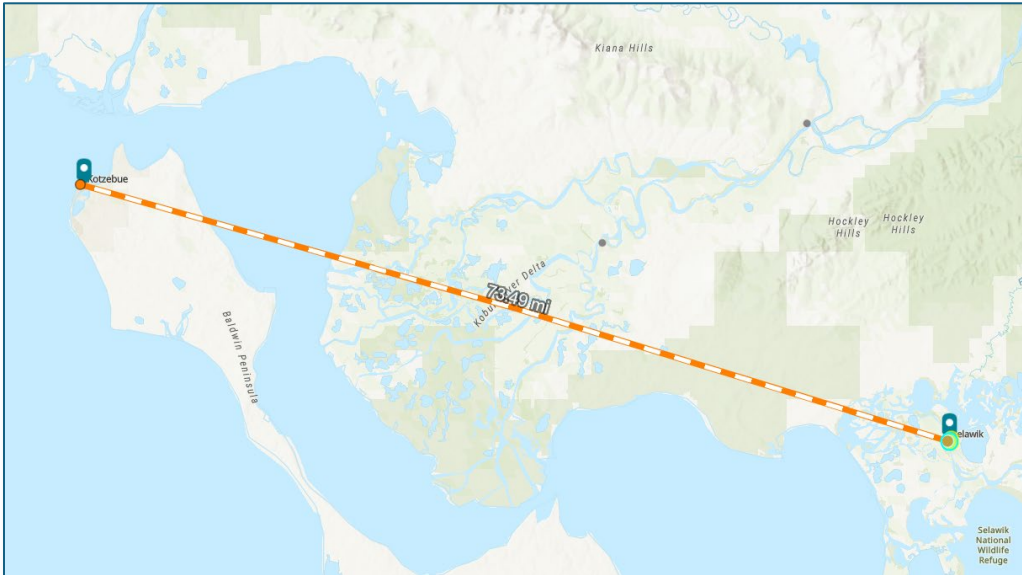


9. This will open a **MEASUREMENT** sidebar on the left-hand side of the opened; click on **MILES** from the drop-down menu.

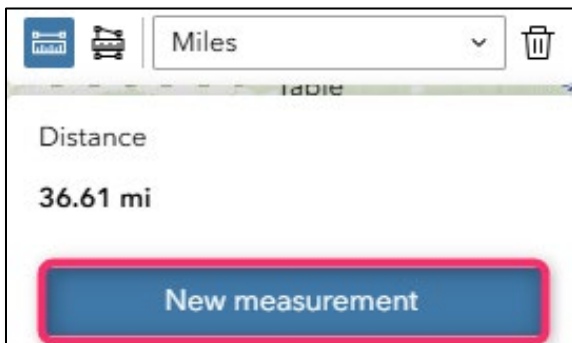


10. Hover over the desired starting point (the cursor will turn into a **+ SIGN**) and click to begin measuring.

11. Move the cursor to the next desired spot (an orange dotted line should be following the cursor) and click once to drop a pin along the route taken
12. Do this as many times as necessary to plot the route taken to the desired end location – **double click on the end location to stop drawing the distance line.** The distance will be calculated automatically and will appear on the map.



13. The user can clear the pins/distance lines at any time by clicking on the **NEW MEASUREMENT** button.
Note: If a printed copy or PDF of a map with the pins/distance line is desired, do not clear them until after printing/downloading the map. See instructions below.

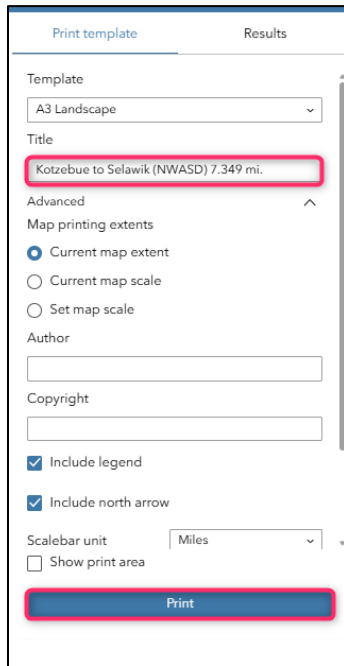


14. To create a PDF of a map for downloading or printing, click on the **PRINT** icon in the menu in the upper-right corner of the map again. To capture district boundaries, zoom out to view or print.

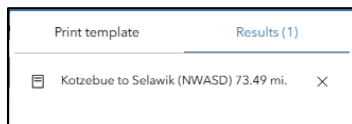


15. This will open a **PRINT** sidebar to the right of the map where the user can enter a map title, choose a page layout, and other advanced options, such as including a legend and including a north arrow.
Note: Clicking on **SHOW PRINT AREA** will show print area. Unclick before clicking the **PRINT** button.

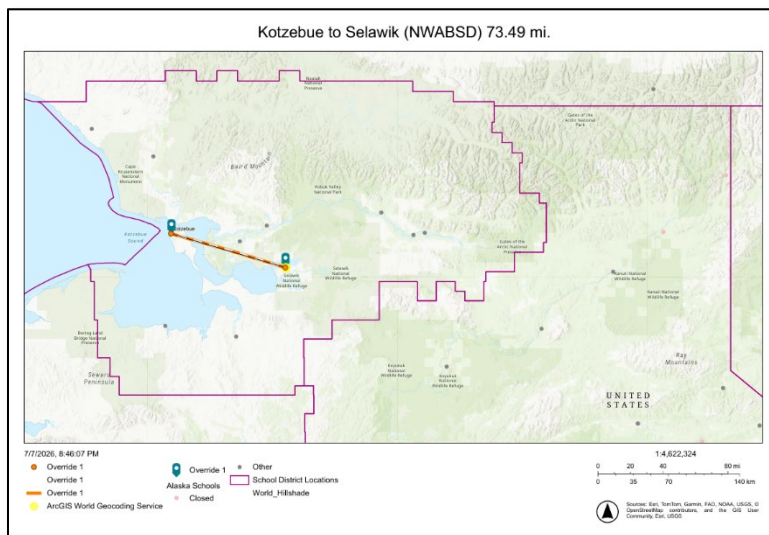
16. Click the **PRINT** button once selections are satisfactory to create a print file that will appear in the **PRINT** top right of the sidebar named **RESULTS**.



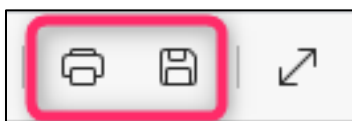
17. Open a PDF of the map by clicking on the map name in the **RESULTS** tab in the **PRINT** sidebar.



18. A PDF of the map will open in a new tab in the browser.



19. When the map opens in a new tab, the user can download it by clicking on the **SAVE** icon and/or print PDF by clicking on the **PRINT** icon; both should be in the upper-right corner of the browser.



20. Repeat these steps to create any additional maps, as needed.

Eligibility Flowchart

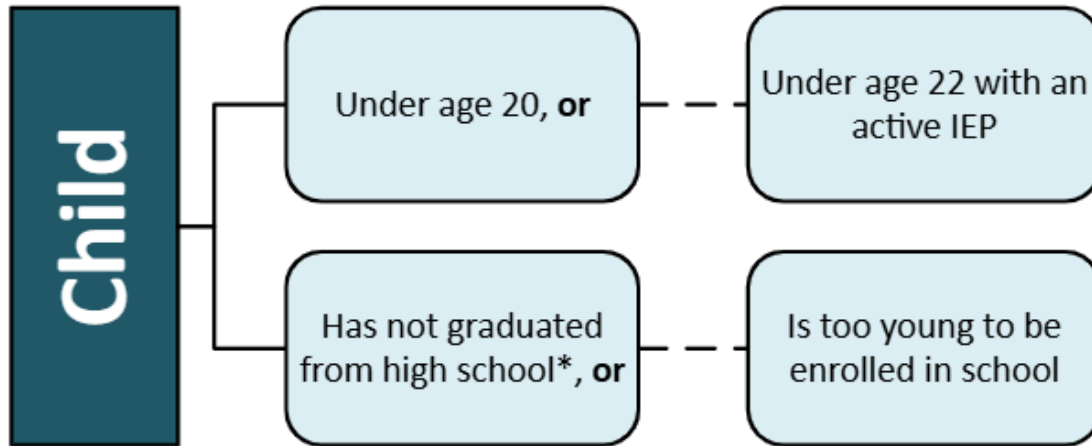
Key for Flowcharts:

— = AND

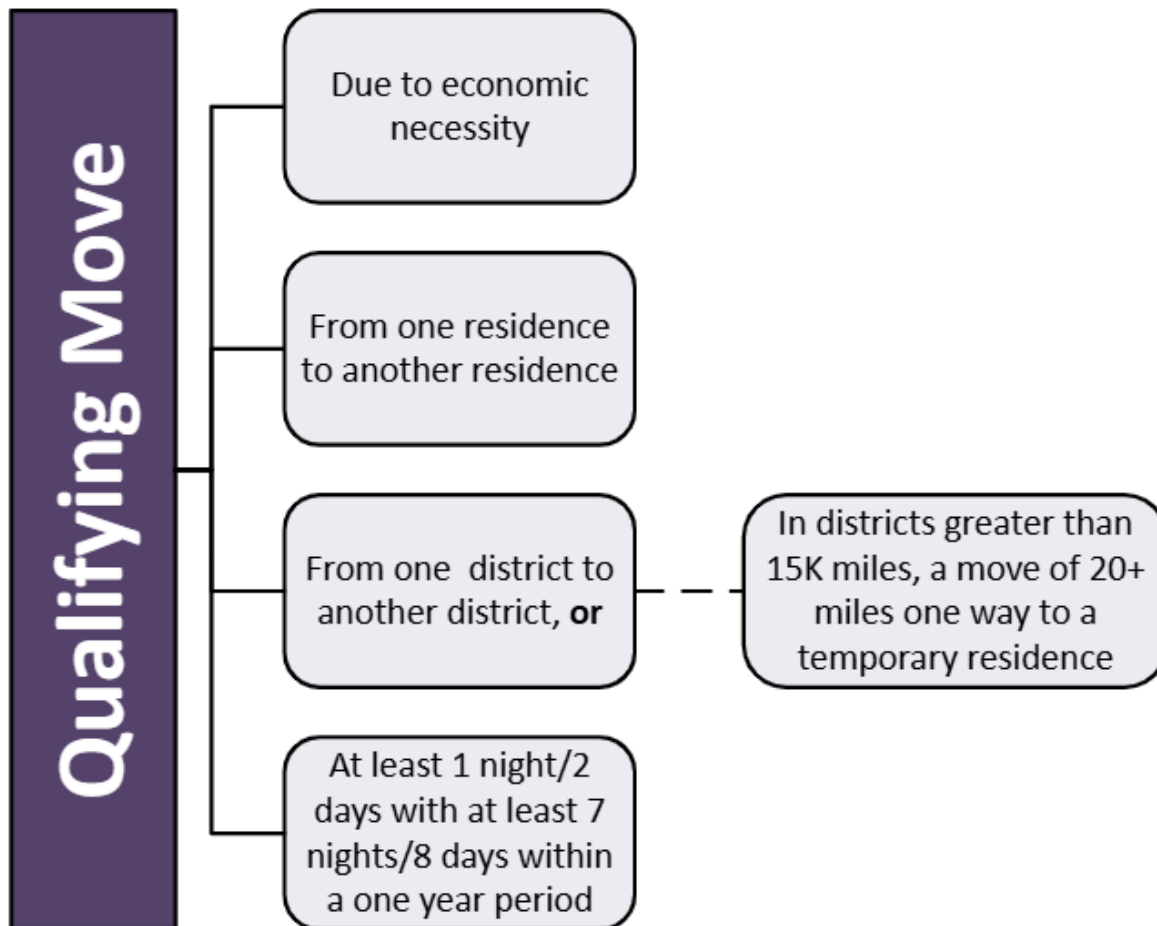
..... = OR

1. Determine if there is an individual in the household who meets the definition of child:

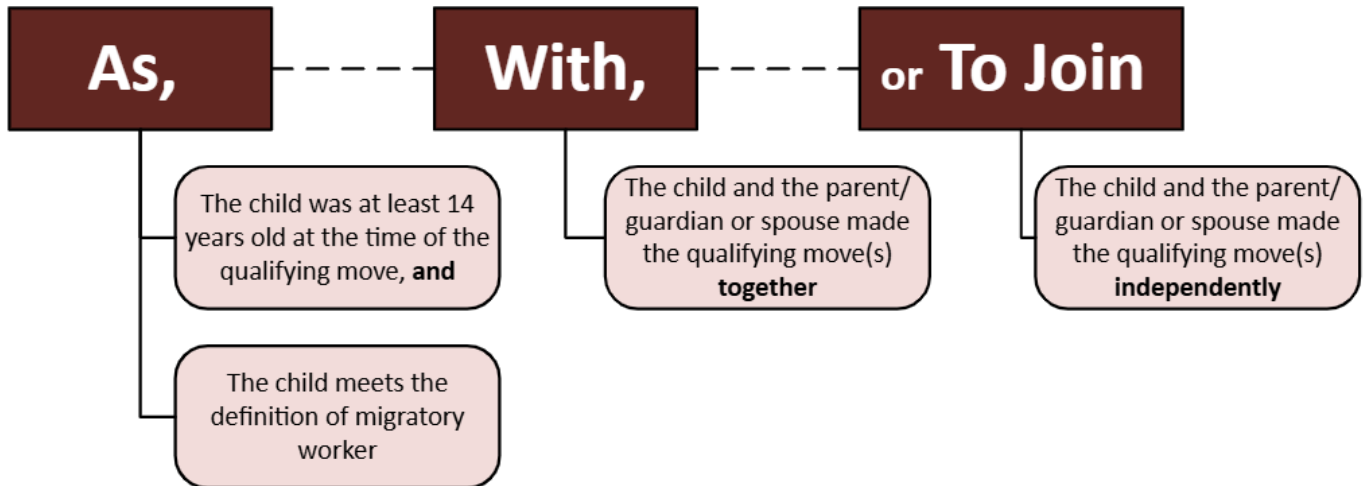
*For the purposes of the program, a GED and certificate of achievement are not considered the same as graduating with a high school diploma.



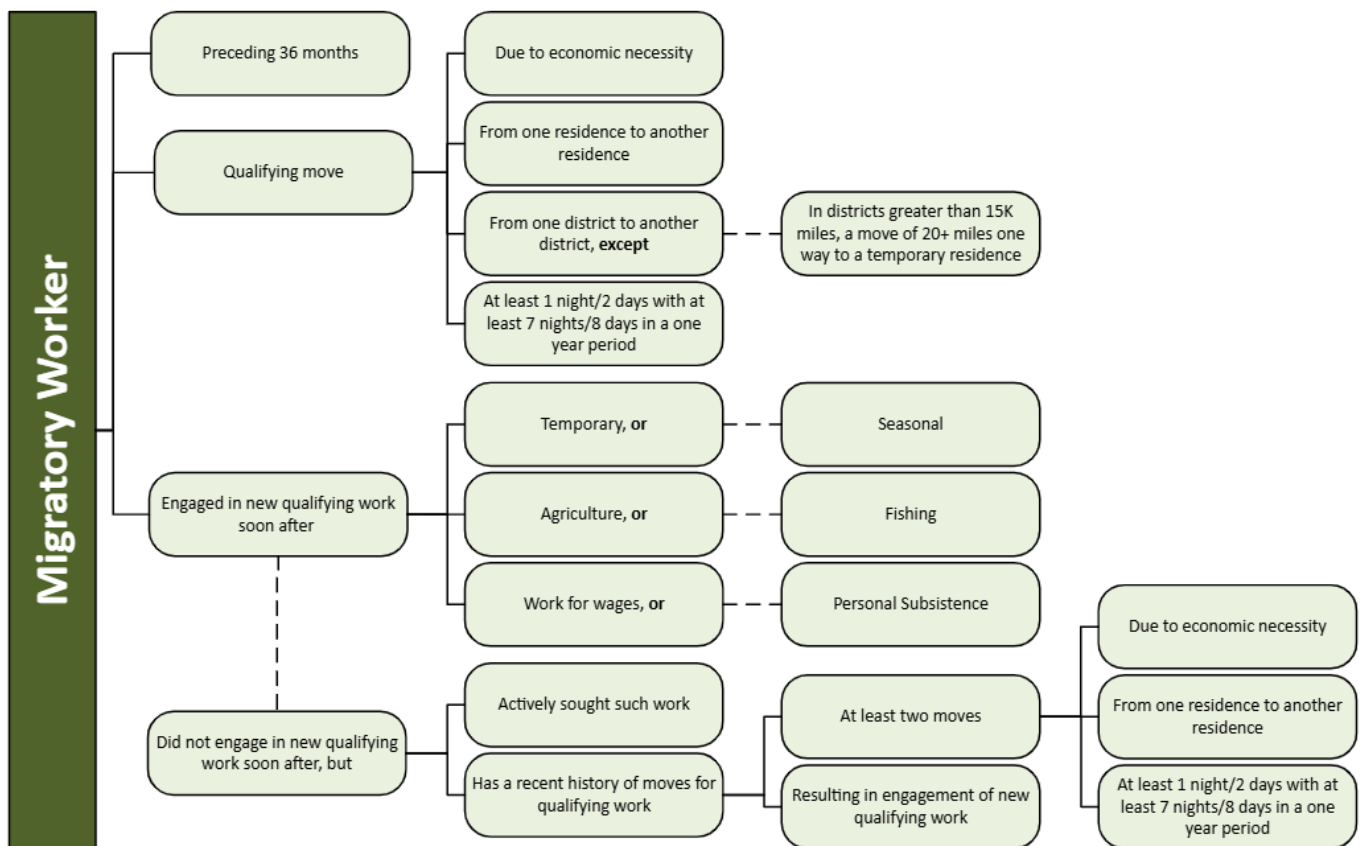
2. Determine if the child made a qualifying move:



3. Determine how the child made the qualifying move (either as, with, or to join a parent/guardian or spouse who is a migratory worker):



4. Determine if the child, the child's parent/guardian, or the child's spouse meets the definition of migratory agricultural worker or migratory fisher:



Interview Framework

Section 1: Lay the Groundwork for the Interview

Introduce Yourself

Hello, my name is _____. I work with the [DISTRICT NAME] Title I-C program. It is a program that is related with the local school that could help you or your children with their education. If I can speak to you for a few minutes about your family and your work, some members of your family might be eligible for services.

Build Rapport

(Look for connections that you can make with the family. For example, did your children go to the same school that the children attend? Finding something positive to say about the parent or child may also help to put the family at ease.)

Credentials

Here is my identification (or business card). It shows that I work for the Title I-C program.

Not in Sales

I am not selling anything. Here is a brochure about the Title I-C program.

Privacy

The information you share with me is private and will be used for educational purposes only. I don't share information with other agencies or government departments unless I have your permission to do so.

Better Time

Is this a good time to talk? I can talk with you at another time if that would be more convenient.

Section 2: Transition to the Interview

Explain the Interview

The Title I-C program helps families that have worked in agriculture or fishing. I need to ask some questions about you and your family to find out if this program can help you. For example, I'll ask about your children's ages, the work you've done, and where you have lived, and where the children have gone to school. We will talk about those things for a little while and then I will summarize what you have told me.

Repeat Questions

Just to be sure that I understood what you told me, I might repeat questions or ask for the same information in a different way.

Probes

If you don't remember something, I will try to help you by asking other questions.

Documents

If you have documents that have information about your family, you can use them to help you answer my questions.

Time to Recall

If you don't know the answers to some of my questions, I can always call you or come by later to finish up our conversation.

Personal Information

I apologize in advance if any of my questions feel personal. I don't mean to offend you, but I need this information to see if this program can help you.

Section 3: Gather Information on Child Eligibility

Eligibility Requirements

1. The **child** is eligible for free public education¹⁰⁸, and
2. made a **qualifying move(s)** due to economic necessity across school district boundaries¹⁰⁹
3. **as, with or to join** a parent/guardian or spouse
4. who is a migratory agricultural worker or migratory fisher.

Section 4: Complete COE

Complete COE

Now I want to fill out the remaining information on the Certificate of Eligibility (COE) Form for the Title I-C program.

Section 5: Transition to the Confirmation Process

Wrap Up

You've been very helpful. I'm going to follow up with my office so they can decide if you and your family are eligible for the program. After all this discussion, do you have anything else to add, or any questions for me?

Introduce Summary

Now I am going to summarize some of the information you told me. Please listen carefully and see if I understand the information that you provided. If I don't understand something you said, please let me know and I will change it.

Section 6: Confirm Responses

Confirm Data

Go through each section of the COE with the parent/guardian and confirm that the information on the form is accurate. Verify all sections of the COE. Be sure to verify move dates and locations, economic necessity, and the four eligibility requirements.

Make Corrections

If necessary, make corrections or clarifications to the COE based off the information garnered while confirming COE data with the interviewee.

¹⁰⁸ To be eligible for Title I-C recruitment, a child must be eligible for a free public education. In Alaska, this means that the child must be younger than 20 and must not have a high school diploma. A child who has a Certificate of Achievement or GED, but not a high school diploma, is eligible for a free public education. A child who is eligible for special education (active IEP on file) is entitled to a free public education until the age of 22.

¹⁰⁹ In all school districts that have an areas less than 15,000 square miles, qualifying moves must cross school district boundaries. In school districts that have an area greater than 15,000 square miles, qualifying moves must cross school district boundaries or be a distance of 20 miles or more, one way, to a temporary residence.

Section 7: Close the Interview

Remind About Privacy

The information you share with me is private and will be used for educational purposes only. I don't share information with other agencies or government departments unless I have your permission to do so. [Additional information may be explained regarding Family Educational Rights and Privacy Act (FERPA).]

Sign COE Form

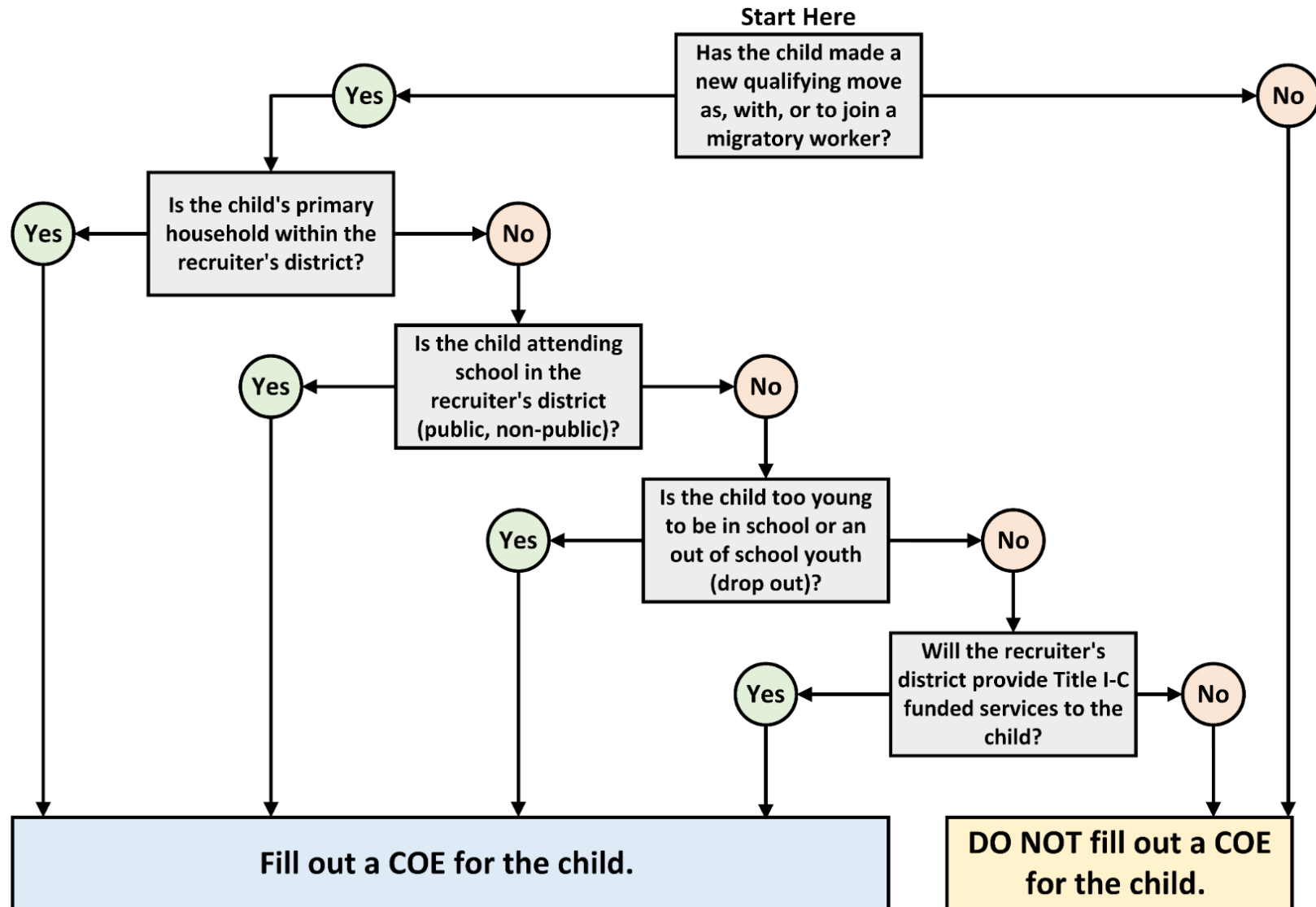
If the information that I have confirmed with you is correct, the interview is now over. Would you please sign the Certificate of Eligibility (COE) form here to confirm that the information that you have provided is correct? Your signature means that you confirm that I've written what you told me. This also certifies that you are willing to talk to a representative from the DEED Title I-C program for a possible re-interview.

Give Copy of COE

Here is a copy of the form that I went over with you so that you can keep a record of the questions that I asked you. If your child/you is/are determined to be eligible, I will mail a completed copy of this form to you.

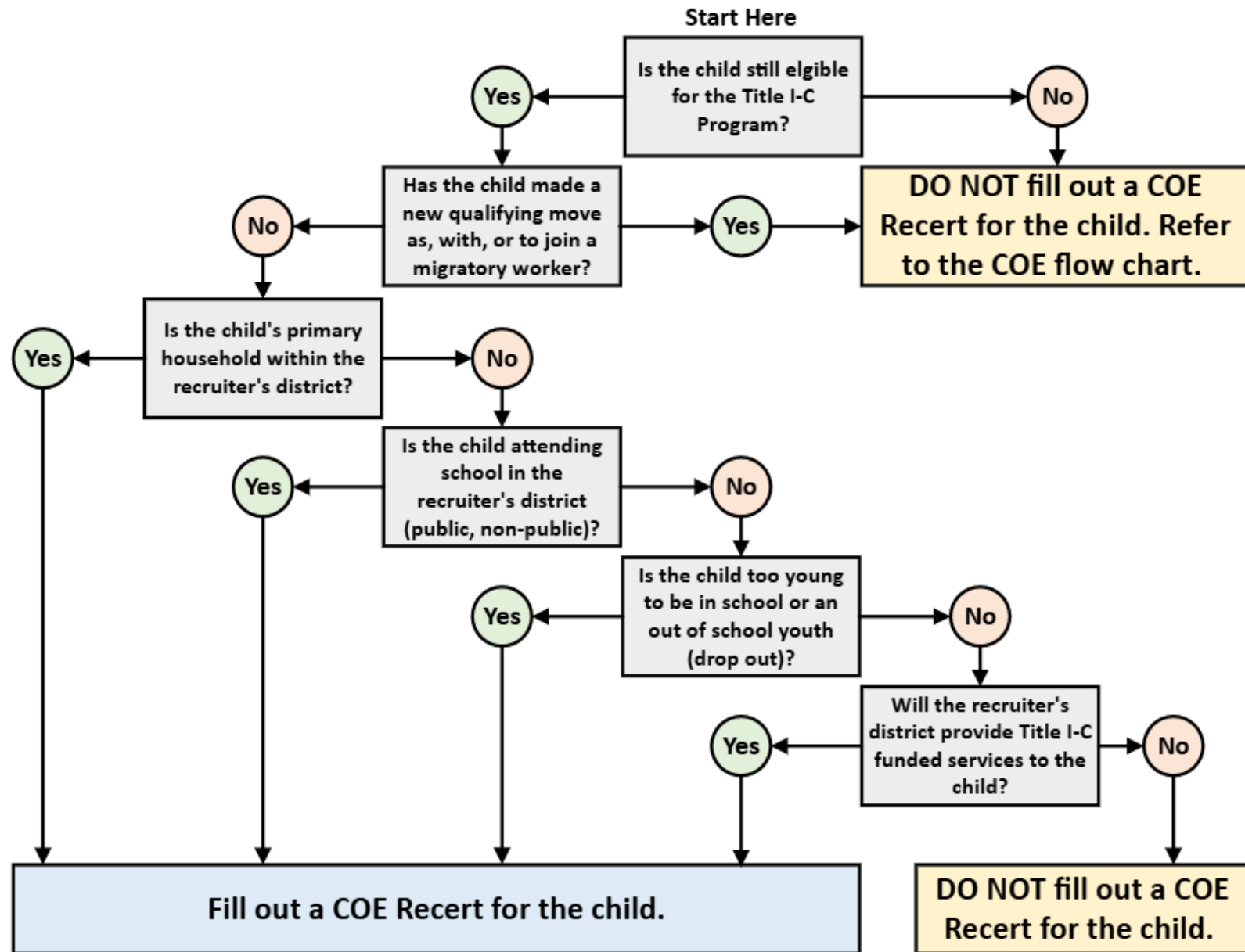
When to Fill out a COE

Use the flow chart below to determine whether it is reasonable for the district to complete a COE for a child.



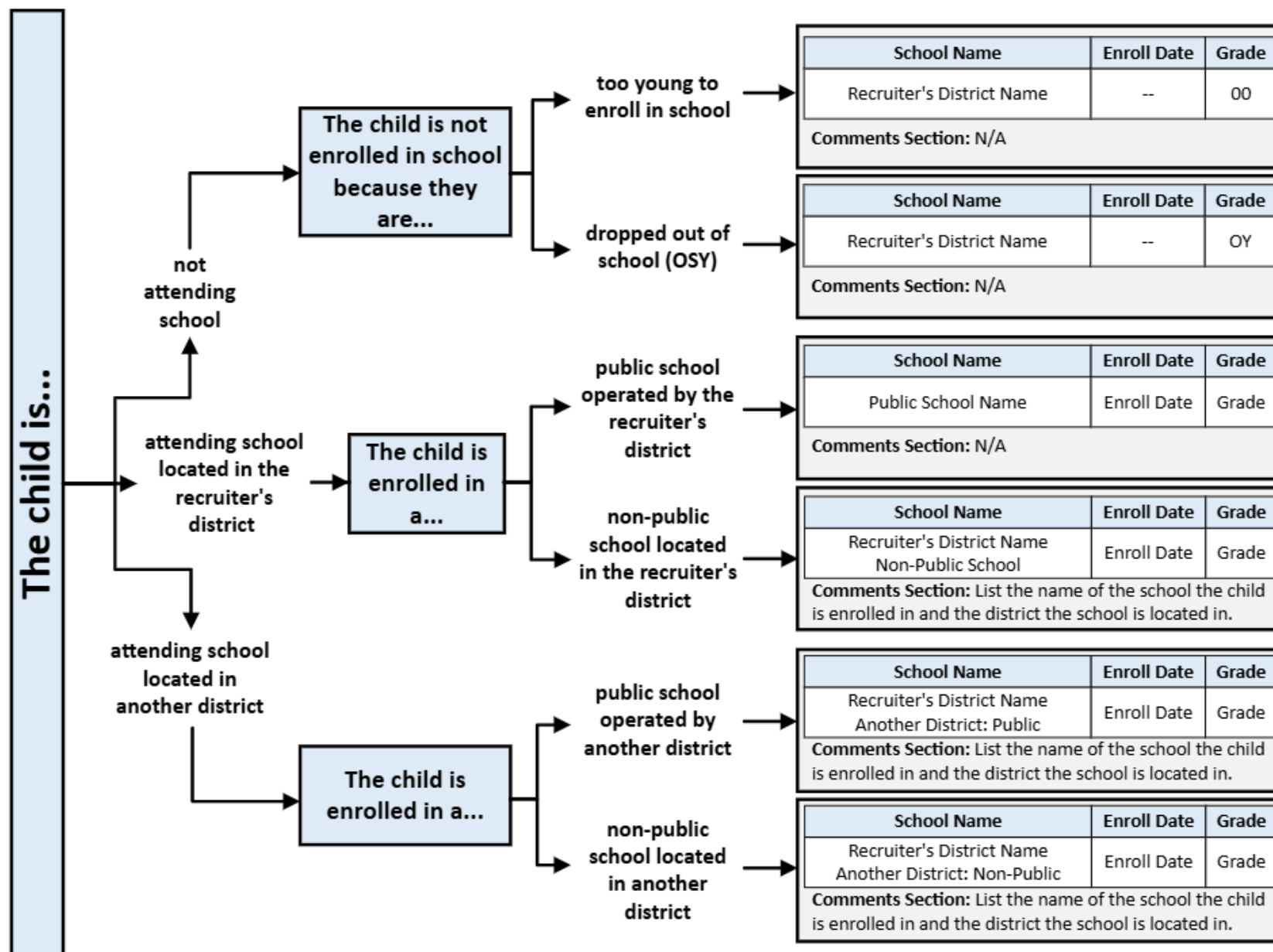
When to Fill out a COE Recert

Use the flow chart below to determine whether it is reasonable for the district to complete a COE Recert for a child.



School Name/Enroll Date/ Grade Flowchart

Below is a flow chart showing different scenarios on how to fill out the **SCHOOL NAME**, **ENROLL DATE** and **GRADE** on the Coe and COE Recert. Further information is available showing [School Name/Enroll Date/Grade Scenarios](#) starting on page 46.



Guide to Economic Necessity and Personal Subsistence

Economic Necessity is the backbone of the Title I-C program. It is crucial that the recruiter verify that the moves recorded on the COE were due to economic necessity.

What is
Economic
Necessity?

- The child and the worker(if the child is not the the worker) move because they could not afford to stay in their current location.

What is
Personal
Subsistence?

- 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.

**Possible
Questions to
Verify that the
Moves were
Due to
Economic
Necessity**

Do you rely on the outcome of the move as a basic/essential source of support for the family? How?

Please explain how the move helps/assists your family.

What hardships would your family encounter if not for this move?

Why is this move a need for your family?

Could you please give me some examples of how this move helps your family?

What basic needs could you not provide your family if not for this move?

**Possible
Questions to
Ask to Obtain
a Personal
Subsistence
Statement**

How do you use the fish/berries?

What do you do with the fish/berries?

Could you please give me some examples of why you bring the fish/berries home?

What would happen if you did not bring the fish/berries home?

Commercial Fishing Terms

A – Commercial Fishing Gear or Processing Activity

Beach Seining	Dragging	Hand Picking	Packing Eggs	Scow
Boxing Line	Dredging	Hand Trolling	(Roe)	Shoveling
Worker	Drift Net	Jigging	Pots	Spotting
Cold Storage	Farming	Laying Skates	Pound	Sunken Net
Worker	Fish Wheel	Line Worker	Power Trolling	Trawling
Digging	Freezing	Loading Dock	Preparation for	Unload and Sort
Dinglebar	Glazing	Worker	Shipping	
Dip Netting	Gillnetting	Longlining	Purse Seining	
Diving	Halibut Cheeking		Set Net	

AND

B – Type of Commercial Catch

Abalone	Geoduck	Lobster	Rockfish (Redfish)	Shrimp
Arctic Cisco	Halibut	Mussels	Sablefish	Sole
Atka Mackerel	Herring	Octopus	Salmon	Squid
Clams	Herring Eggs	Oysters	Scallops	Tuna
Crab	Hooligan - Smelt	Pacific Cod	Sea Cucumber	Turbot
Flounder	Lingcod	Pollock	Sea Urchins	

Subsistence Fishing Terms

A – Subsistence Fishing Gear or Processing Activity

Beach Seining	Drift Net	Hand Picking	Pole*	Storing
Cutting	Drying	Hand Trolling	Purse Seining	Power Trolling
Digging	Fish Trapping	Jigging	Rendering	
Dip Netting	Fish Wheel	Laying Skates	Set Line	
Diving	Freezing	Longlining	Set Net	
Dragging	Gillnetting	Pots	Spear	

AND

B – Type of Subsistence Catch

Abalone	Burbot	Herring	Pacific Cod	Shrimp
Atka Mackerel	Clams	Herring Eggs	Pike	Smelt
Arctic Char	Crab	Hooligan	Pollock	Stickleback
Arctic Cisco	Dolly Varden	Lingcod	Rockfish (Redfish)	Tuna
Arctic Grayling	Flounder	Lobster	Salmon	Trout
Arctic Lampreys	Geoduck	Longnose Sucker	Sablefish	Whitefish
Bering Cisco	Gumboot Chiton	Mussels	Scallops	
Black Fish	Halibut	Oysters	Sheefish	

***Pole fishing** is an acceptable subsistence migratory work activity. However, a statement is required in the **COMMENTS** section verifying that the pole was not used for either sport or recreation.

Agricultural/Logging Terms

Logging Activities

Boom Boat Operator	Creek Clearing	Log Chasing	Skidder Operating
Boom Manning	Cutting	Log Loader Operating	Soil Preparing
Booming	Falling	Log Scaling	Tending Seedlings
Bucking	Front End Loader	Log Towing	Tree Thinning
Bull Bucking	Grapple Yarder Operator	Planting Seedlings	Marking
Bushing	Hook Tending	Rigging Slinger	Shifting
Choke Setting	Log Banding	Side Rodding	Shovel Operator

Agricultural/Crop Terms

A – Crop Work or Processing Activity

Applying Herbicides	Fertilizing	Loading	Thinning
Applying Insecticides	Freezing	Packaging	Washing and Sorting
Breaking/Tilling Soil	Growing	Picking	Watering
Cultivating/Plowing	Harvesting	Planting	Weeding
Cutting	Hoeing	Preparing Land	
Digging	Irrigating	Pruning	

AND

B – Type of Crop

Apples	Corn	Oranges	Tobacco
Barley	Fireweed	Papaya	Vegetables
Berries	Grass Seed	Pinecone Seeds	Wheat
Cherries	Hay	Potatoes	
Coconut Palms	Mushrooms	Spruce Tips	

Agricultural/Livestock Terms

A – Livestock Work or Processing Activity

Branding/Tagging	Loading and Unloading Livestock
Cleaning Animals, Stalls, Barns, etc.	Packaging
Cleaning, Maintaining Area & Equipment	Slaughtering
Feeding, Watering and Tending	Weighing
Fencing/Building & Repairing Fences	Preparing for Transport to Processor

AND

B – Type of Livestock

Cattle	Horses	Reindeer
--------	--------	----------

***Berries:** Subsistence berry picking is different from agricultural berry picking. Agricultural berry picking is usually performed for wages.

Templates / Forms

Eligibility Checklist

A child is Title I-C eligible if all four of the following conditions are met:



Use the checklist below to determine whether a child meets each of the four migratory child eligibility requirements. Circle each sub criteria (1,2,3, a, b, c, i, ii, etc.) that a particular child meets. If a child meets the required sub criteria, check the “Yes” check box under “Meets Criteria”. For a child to be considered a migratory child, all four “Yes” boxes must be checked.

Meets Criteria	Eligibility Criteria
☐ Yes ☐ No	The child is eligible for a free public education, and - the child is under 20 years old (or under 22 with an active IEP), and (choose one of the following) - the child has not graduated from high school with a diploma, or - the child is too young to be enrolled in school (baby, toddler, etc.)
☐ Yes ☐ No	made a qualifying move within the preceding 36 months - the move was due to economic necessity, and - the move was from one residence to another residence, and (choose one of the following), and - the move was from one school district to another school district, or - the move was 20 miles or more, one way, to a temporary residence in a district that is greater than 15,00 square miles - the length of the qualifying move was at least 1 night/2 days with a total of 7 nights/8 days within a one-year period (365 Days).
☐ Yes ☐ No	as, with or to join a parent/guardian or spouse - The child made the qualifying move (choose one of the following) - as the worker, or - with the worker, - a parent/guardian, or - a spouse - to join the worker, - a parent/guardian, or - a spouse
☐ Yes ☐ No	who is a migratory agricultural worker or migratory fisher - A migratory agricultural worker or migratory fisher - made a qualifying move in the preceding 36 months, and - soon after doing so (choose one of the following) - engaged in new temporary or seasonal employment or personal subsistence in agriculture or fishing or - did not engage in such new employment soon after the move, but - the individual actively sought such new employment, and - the individual has a recent history of moves (at least two moves) for temporary or seasonal agricultural or fishing employment

COE Comments Menu

Below is a list of the required comments needed for various scenarios, a COE could have multiple required comments. For a more detailed explanation on [required comments](#) and [recommended comments](#), refer to the [Comments](#) section starting on page 63.

Additional Qualifying Moves

- ☐ List any differences that the moves listed in the **ADDITIONAL QUALIFYING MOVES** section have compared to the moves listed in the **QUALIFYING MOVES & WORK** section such as different locations, qualifying work, or migratory worker (if applicable).
- ☐ Provide any other clarifying information (if applicable).

Agricultural Move

- ☐ Document if the immediate or extended family owns the land where the migratory worker was engaged in the qualifying work.
- ☐ Provide any other clarifying information (if applicable).

Child As the Worker Move

- ☐ Economic necessity statement that verifies that the fish and/or income went back to support child's main household.
- ☐ Provide any other clarifying information (if applicable).

Child Listed in Facility Not Operated by the Recruiter's District

- ☐ List the name of the school.
- ☐ List the school district that the school is located in.

Children Not on Move / Siblings on Another COE

- ☐ List any children living in the same household who did not go on the move (if applicable).
- ☐ Document whether these children are listed on a COE Recert (if applicable).
- ☐ List siblings that are on another COE due to different move dates, etc. (if applicable).
- ☐ Provide any other clarifying information (if applicable).

Did Not Engage in New Qualifying Work (#4b)

- ☐ Document how the migratory worker actively sought new qualifying work.
- ☐ Document the migratory worker's recent history of moves (at least 2 moves) for qualifying work.
- ☐ Provide any other clarifying information (if applicable).

Extended Move (30+ days)

- ☐ Verify dates of engagement in qualifying work.
- ☐ Provide any other clarifying information (if applicable).

IEP

- ☐ Document if the child is 20 years of age or older and has an active IEP on file.
- ☐ Due to confidentiality in Special Education, recruiters should not directly ask parents about IEPs. This comment may be provided by the records manager. If the parents volunteer special education status, it can be noted on the COE.

Logging Move

- ☐ Document the name of the logging company, address, and contact number.

Migratory Worker Engaged in Work More than 60 Days After the Move (#4a)

- ☐ Explain why worker is determined to be a migratory worker based on his or her engagement in new qualifying work more than 60 days after the qualifying move described in question 4 of the **QUALIFYING MOVES & WORK** section.
- ☐ Provide any other clarifying information (if applicable).

Migratory Worker (Guardian)/Different Household

- ☐ Guardian's physical address, phone number and relationship to child (P.O. Box addresses are not considered physical addresses).
- ☐ Verify that the fish and/or income went back to support child's main household and the worker's household if qualifying work was for personal subsistence.
- ☐ Guardian must be 14 years of age or older at the time of the qualifying move.
- ☐ Provide any other clarifying information (if applicable).

Migratory Worker Residency Date

- ☐ Document migratory worker residency date if the move listed in question 1 is different than the move listed in **question 4** of the **QUALIFYING MOVES AND WORK** section to show at least 7 nights/8 days of engagement in qualifying work.
- ☐ Provide any other clarifying information (if applicable).

Moves Within a 15K+ District

- ☐ Map with a scale is attached which verifies that the moves were at least 20 miles or more, one way, to a temporary residence when the moves are within a 15K+ district.
- ☐ If the guardian lives in a different location than the child, a separate map with a scale for both the child and the guardian must be attached to original COE and a map comment for both the child and guardian must be provided.
- ☐ Provide any other clarifying information (if applicable).

Multiple Middle Names

- ☐ List child's full name if it does not fit in the **CHILD DATA** section (if applicable).
- ☐ Provide any other clarifying information (if applicable).

Multiple Migratory Workers

- ☐ Verify that each migratory worker has engaged in migratory work for 7 days/8 nights within a one-year period.
- ☐ Verify that the moves made were for economic necessity.
- ☐ Provide any other clarifying information (if applicable).

Not Attending School in Recruiting District

- ☐ Document school name.
- ☐ Document district name.
- ☐ Provide any other clarifying information (if applicable).

Permanent Move

- ☐ Document the actual dates of engagement in qualifying work.
- ☐ Provide any other clarifying information (if applicable).

Personal Subsistence (#4*)

- ☐ Document if 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.
- ☐ Provide any other clarifying information (if applicable).

Pole Fishing

- ☐ Verify that the pole was not used for either sport or recreation. Pole must only be used for subsistence purposes.
- ☐ Provide any other clarifying information (if applicable).

Temporary Employment (#5a or 5b)

- ☐ Verify the method of determining that the work was temporary
- ☐ Worker's Statement
- ☐ Employer's Statement
- ☐ Provide any other clarifying information (if applicable).

To Join/Precede Worker (#2bi)

- ☐ Verify the reason for child to either join/precede worker.
- ☐ Provide any other clarifying information (if applicable).

COE Review Checklist

Recruiters may use this checklist to help review the COE. Please note that this is not an all-inclusive list of requirements.

General Checklist Items	Met
A trained recruiter completed the COE.	☐
COE is written in blue or black ink, if using a paper COE.	☐
Every field on the COE is reviewed for spelling and consistency.	☐
Dates are listed in the MM/DD/YY format.	☐
A new COE is used for each child with a different QAD, different eligibility information, or different residence.	☐
Qualifying Moves & Work section: No corrections made. No cross-out, whiteout, or correction tape.	☐
Other sections: Corrections are made by drawing a single line through the mistake and is initialed and dated.	☐

Top of COE Section Checklist Items	Met
COE is for the current school year.	☐
Residency date is provided. (date child establishes/reestablishes residency in the recruiter's district.)	☐

Child Data Section Checklist Items	Met
Children are listed youngest to oldest.	☐
The full legal name for each child is provided. Names are spelled correctly.	☐
The following fields are completed for each child: Birthdate, Sex, MB, EB, and VER	☐
Each child has a school name, enroll date (if applicable), and grade. Enroll dates are required for all children, except children who are not yet enrolled in school (00), or out of school youth (OY).	☐
Enroll dates are for the current school year and are on/after the QAD and residency date.	☐

Family Data Section Checklist Items	Met
Parent/Guardians' names are listed in the order of Last Name, First Name .	☐
A current physical address is provided. Mailing address is provided if different than current physical address.	☐
At least one telephone number that can be used to reach the family is provided. The number isn't a district number.	☐

Qualifying Moves & Work Section Checklist Items	Met
All moves are within the preceding 36 months.	☐
All moves are due to economic necessity.	☐
The worker's name is listed First Name then Last Name .	☐
The child's relationship to the worker matches whether they moved with/as/to join or precede the worker.	☐
The eligibility data is clear and appears reasonable (i.e., the child meets all Title I-C eligibility criteria, including that the worker meets the definition of a migratory worker).	☐
The Qualifying Work activity (i.e., catch and gear) is provided.	☐
Temporary or Seasonal is selected accordingly.	☐
Agricultural or Fishing is selected accordingly.	☐
Personal subsistence is selected, if applicable.	☐
The QAD makes sense in accordance with the Residency Date and place of residence.	☐

Additional Qualifying Moves Section Checklist Items	Met
Additional qualifying moves are older than the QAD .	☐
Additional moves are listed in order of most recent (after QAD) to oldest.	☐

Comments Section Checklist Items	Met
Required comments are provided for 2bi, 3a, 4*, 5a, and 5b, if applicable.	☐
Comments provided allow for a 3 rd party reviewer to understand eligibility determination.	☐
Comments are initialed and dated.	☐

Interviewee Section & Eligibility Data Certification Section Checklist Items	Met
The COE is printed with blank signature fields. Signature fields are not pre-filled prior to getting signatures.	☐
The COE is signed and dated in this order: the interviewee, the interviewer, and the designated SEA reviewer.	☐

Sample Calendar

2026/2027 Calendar for the Title I-C Program

Keep this calendar on your refrigerator until your children have finished fishing/berry picking for the school year. Please mark all the nights your children spent away from home on your fishing or berry picking trips. Please return this to your children's school or the local Title I-C Program located at_____.

If you have any questions or concerns, please contact the _____ School District Title I-C Program at_____.

2026														2027													
May							June							May							June						
S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S
					1	2		1	2	3	4	5	6							1		1	2	3	4	5	
3	4	5	6	7	8	9	7	8	9	10	11	12	13	2	3	4	5	6	7	8	6	7	8	9	10	11	12
10	11	12	13	14	15	16	14	15	16	17	18	19	20	9	10	11	12	13	14	15	13	14	15	16	17	18	19
17	18	19	20	21	22	23	21	22	23	24	25	26	27	16	17	18	19	20	21	22	20	21	22	23	24	25	26
24	25	26	27	28	29	30	28	29	30					23	24	25	26	27	28	29	27	28	29	30			
31														30	31												
July							August							July							August						
S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S
				1	2	3							1							1	2	3	4	5	6	7	
5	6	7	8	9	10	11	2	3	4	5	6	7	8	4	5	6	7	8	9	10	8	9	10	11	12	13	14
12	13	14	15	16	17	18	9	10	11	12	13	14	15	11	12	13	14	15	16	17	15	16	17	18	19	20	21
19	20	21	22	23	24	25	16	17	18	19	20	21	22	18	19	20	21	22	23	24	22	23	24	25	26	27	28
26	27	28	29	30	31		23	24	25	26	27	28	29	25	26	27	28	29	30	31	29	30	31				
							30	31																			
September							October							September							October						
S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S
				1	2	3							1							1	2	3	4	5	6	7	
6	7	8	9	10	11	12	4	5	6	7	8	9	10	5	6	7	8	9	10	11	3	4	5	6	7	8	9
13	14	15	16	17	18	19	11	12	13	14	15	16	17	12	13	14	15	16	17	18	10	11	12	13	14	15	16
20	21	22	23	24	25	26	18	19	20	21	22	23	24	19	20	21	22	23	24	25	17	18	19	20	21	22	23
27	28	29	30				25	26	27	28	29	30	31	26	27	28	29	30			24	25	26	27	28	29	30
																					31						

☐ My family did not go fishing or berry picking this year.

List all individuals who went on the fishing and/or berry picking trips:

List any other fishing or berry picking dates within the last 12 months:

Contact Information

Parent/Guardian Name: _____

Contact Phone Number: _____

Address: _____

Sample Migratory Work Questionnaire #1

Please take time to complete this quick survey. All your answers will be kept confidential. The information you provide may help _____ School District qualify for Federal funding to provide more education services to our students.

This program serves children of migratory families who participate in fishing, logging, and/or agricultural industries.

1. **Within the past three years, has anyone in your family engaged in any of the following activities? If so, please check the appropriate categories.**

- ☐ Commercial Fishing (cannery work, fishing boat, deckhand, etc.)
☐ Subsistence Fishing (catching fish for personal use, fish camps, etc.)
☐ Logging (cultivation or harvesting of trees)
☐ Agriculture, including berry picking (producing or processing crops, dairy products, livestock, etc.)

If you **have not** checked any of the above, please go no further and discard this survey.

If you **have** checked one of the above, please complete the rest of this survey.

2. **Who was/were the individual(s) that engaged in the activity checked above?**

Name	Relationship to Children (parent, guardian, grandparent, sibling, self, etc.)

3. **Please list the names of the children living in the household:**

Name	School	First Day	Grade

4. **Please provide contact information so that the _____ School District Title I-C Program may get in touch with you.**

Parent/Guardian Name: _____

Home Phone Number: _____

Cell Phone Number: _____

Work Phone Number: _____

Address: _____

Please give this survey to your school secretary or mail it to:

District:

Mailing Address:

Sample Migratory Work Questionnaire #2

Dear Parents/Guardians:

To better serve your children, _____ School District would like to identify students who may qualify to receive additional educational services and/or free lunch. The information provided below will be kept confidential. Please answer the following questions and return this survey to your child(ren)'s school or the local Title I-C Program located at _____. Or, if you prefer, for more information call your district's Title I-C at_____.

1. **Have your children (from birth up to 20 without a high school diploma) made overnight trips for commercial fishing, subsistence fishing, logging, or agricultural work (including subsistence berry picking) within the past three years?**

☐ Yes ☐ No

2. **Have you or your children recently (within the last three years) moved to the [INSERT SCHOOL DISTRICT NAME] or [INSERT CITY/TOWN/VILLAGE NAME]?**

☐ Yes ☐ No

3. **Which of the following activities, if any, have you, your children, or any member of your household participated in within the past three years?**

- ☐ Commercial fishing
☐ Cannery/fish processing work
☐ Subsistence fishing (fish camp, personal use – including preparing and processing for home pack)
☐ Logging (commercial)
☐ Agricultural work (including subsistence berry picking)
☐ None of the above, nobody in my household has done any of the above activities

4. **If “Yes” has been selected in either question 1 or 2, please list the name(s) of the child(ren) living in the household:**

First Name	Last Name	School (if any)

5. **Please provide the following information. A recruiter may contact you to find out if your children are eligible for the Title I-C Program.**

Parent/Guardian Name:_____

Home Phone Number:_____

Cell Phone Number:_____

Work Phone Number:_____

Address:_____

Sample Interview Script

Interviewee's First/Last Name: _____

Date of Interview: _____

Eligible Children in Household

1. **Do you have children under 20¹¹⁰ years of age that have not graduated from high school¹¹¹ including children who are too young to be enrolled in school? (COE QMW Q1)**
☐ No *(Re-word the question to confirm whether all children in the household have graduated high school. If no eligible children, exit interview.)*
☐ Yes *(Continue to question 2)*
2. **Have you or anyone in your household moved or traveled from your home or another location to do fishing, logging, or agricultural activities (including berry picking) within the past 3 years? (COE QMW Q2)**
☐ No *(Re-word the question to confirm and if none, exit interview.)*
☐ Yes *(Continue to question 3)*

Qualifying Move for the Migratory Agricultural Worker or Migratory Fisher

3. **Who was engaged in the work? (COE QWM Q3)**

4. **Did anyone else outside of the household go on the move? (COE QMW Q3)**
☐ No
☐ Yes *(If the child was the worker, ask if the child traveled with a worker from another household. Refer to page 64 for recording moves made with a guardian from another household.)*

5. **What work specifically was [WORKER NAME from #3] engaged in? (COE QMW Q4)** *(Verify type of gear/activity and type of catch. Refer to page 140 for term lists. Ask about the nature of job duties if unclear.)*

6. **When was the last time [WORKER NAME from #3] engaged in the [SPECIFIC WORK LISTED from #4]? (COE QMW 3)**

7. **Where did [WORKER NAME from #3] travel from/to for the [SPECIFIC WORK LISTED from #4]? (COE QMW Q3)** *(City might not be an actual city. Ask names of fish camps or river, if applicable.)*
 - a. **From** (Record school district, city, state):

 - b. **To** (Record school district, city, state):

 - c. **Miles**¹¹² *(If move was within the same district):*

(The distance of 20 miles or more to a temporary residence does not have to be in a straight line. For example, they could be river miles.)

¹¹⁰ A child who has an active IEP on file is entitled to a free public education until the age of 22.

¹¹¹ A child who has a Certificate of Achievement or GED, but not a high school diploma, is eligible for a free public education.

¹¹² In all school districts that have an area less than 15,000 square miles, qualifying moves must cross school district boundaries. In school districts that have an area greater than 15,000 square miles, qualifying moves must cross school district boundaries or be a distance of 20 miles or more, one way, to a temporary residence.

8. How long¹¹³ was [WORKER NAME in #3] engaged in the [SPECIFIC WORK LISTED from #4]? (COE QMW Q3 and Residency Date)

(It might be necessary to ask additional questions to determine the number of nights and length of eligible moves. "How many nights were you gone?" If less than 7 night/8 days of worker engagement, ask if there were any other additional qualifying moves where the worker engaged in qualifying fishing, agriculture, or logging activity. "Did you just go on one trip this year or did you travel more than once?")

9. Did your children travel with [WORKER NAME from #3] on the move for the [SPECIFIC WORK LISTED from #4]? (COE QMW Q2a)

- ☐ No (Continue on to question 10)
☐ Yes (Skip to question 13)

Qualifying Move for the Child(ren)

10. If no, did the children travel separately to join [WORKER NAME from #3] there? (COE QMW Q2a)

- ☐ No (Continue on to question 11)
☐ Yes (Answer a, b, and c then skip to question 13)
a. What was the date the children moved? _____
b. What was the date the [WORKER NAME from #3] moved? _____
c. Why did they travel on separate dates? _____

11. If no, was one or more of the children at least 14 years old at the time of the move, and traveled to engage in the [SPECIFIC WORK LISTED from #4] themselves? (COE QMW Q2a)

- ☐ No (Continue on to question 12)
☐ Yes (Skip to question 13)

12. If no, did the children make a different move¹¹⁴ with or to join [WORKER NAME from #3]? (COE QMW Q2a)

- ☐ No (Re-word the question to confirm and if none, exit interview)
☐ Yes (Answer a, b, and c then continue to question 12)
a. If yes, what was the date of this move? _____ (insert QAD)
b. On this date, where did children and [WORKER NAME from #3] travel from? (Record school district, city, state) _____

13. Where did the children and [WORKER NAME from #3] move to? (Record school district, city, state) (COE QMW Q1 & Q3)

¹¹³ The length of the qualifying move(s) must be at least one night/two days, with a total of at least seven nights/eight days within a one-year period.

¹¹⁴ Reminder: the move that the child makes with the worker does not have to be the move that was made to engage in the work.

Economic Necessity of Move(s)

14. Please explain how the move/trip helps your family. (COE QMW Q4)

(Verify that the move(s) were an economic necessity¹¹⁵ for the family. What hardships would your family encounter if not for the move?" "Why is this move a need for your family?" "What would change if you didn't have the food/money from this move?" "Could you afford to stay in your current location without this move?" DO NOT ASK about the amount of money derived from the activity.)

Child Data

15. Please list the information for the children who went on the qualifying move(s) in the table below:

First/Middle/Last Names	Birth Date	Ethnicity	School Name	Grade	Enroll Date

¹¹⁵ Economic necessity means that the child and the worker move because they could not afford to stay in their current location.

Sample Eligibility Related Letters to Parents/Guardians

Notification of Title I-C Eligibility Letter

Dear Parent/Guardian:

A representative from the *District Name* Title I-C program recently visited with you and/or your family to determine if the children listed below may be eligible for the Title I-C program. This letter is to inform you that, based on information that the Alaska Department of Education & Early Development reviewed, *insert child(ren)'s name(s)* has been approved for the *District Name* Title I-C program. Your children's eligibility for the Title I-C program will end on *Insert EOE Date*.

As a participant in the Title I-C program, your children are now eligible to receive *Insert List of Supplemental Services Available through the Title I-C program*. Additionally, your child(ren) will receive free meal benefits. These benefits and services will be available to your child(ren) until *Insert EOE Date*. It is important to note that a recruiter from our district will contact you annually to get updated information to extend this eligibility, if possible.

Attached you will find a copy of the information submitted and approved for the children. Please be aware that the Alaska Department of Education & Early Development will periodically call a small, random sample of families. These phone calls are to help ensure that information for the program has been documented accurately.

If you have questions or need assistance for your child(ren), contact *Insert Title I-C Contact Name* at *Phone Number*.

Sincerely,

District Representative Name, Title

Notification of Title I-C Ineligibility Letter

Dear Parent/Guardian:

A representative from the *District Name* Title I-C program recently visited with you and/or your family to determine if *insert child(ren)'s name(s)* may be eligible for the Title I-C program. Based on a review of the forms completed, it was determined that *insert child(ren)'s name(s)* is ineligible for services in the Title I-C program.

Thank you for allowing the representative the opportunity to visit you and/or your family and to review your Title I-C program eligibility information. If you have questions or concerns, contact *Insert Title I-C Contact Name* at *Phone Number*.

Sincerely,

District Representative Name, Title

End of Eligibility Notification Letter

Dear Parent/Guardian:

This letter is to inform you that your child(ren), *insert child(ren)'s name(s)*, is no longer eligible for *District Name* Title I-C program funded support services in your school or home. Your child(ren)'s last qualifying move was on *Insert QAD*, and their eligibility to be included in the program ended on *Insert EOE Date*.

The Title I-C program can only serve children who made qualifying move(s) within a three-year period. Our records indicate that your child(ren) has not made a qualifying move within the past three years. Any services for your child(ren) provided through the Title I-C program will stop at the end of the current semester. Additionally, if your child(ren) is enrolled in school, the eligibility to receive free meal benefits will continue for remainder of the regular school year.

If you have questions or would like to be interviewed for a recent move, contact *Insert Title I-C Contact Name* at *Phone Number*.

Sincerely,

District Representative Name, Title

Appendix B: Records Manager / Title I-C Coordinator Resources

General Resources

Title I-C Important Dates

Date	Task	Page
August 1	Beginning of Recruitment Season First day of migratory child recruitment for the school year.	11
August 15	Migrant Web System User Access Form(s) due For district staff to have access to the Alaska Migrant Web System, this form must be completed and submitted to DEED.	N/A
September 15	Designated SEA Reviewers Form due Districts must appoint an individual to sign the Certificate of Eligibility (COE) as the designated SEA reviewer. DEED will not review any submitted COEs until this form is submitted.	N/A
September 30	Summer Services Report (SSR) due This report collects the Title I-C supplemental services provided to each migratory child during the summer. The report also collects enrollment and withdrawal dates for each child served and any applicable term codes and dates, such as graduates, out of school youth, and families who have moved out of district. Summer Term Course History Report due Each district is required to report course history information on all current eligible migratory children in grades 9-12.	98
October 15	Priority For Service K-2 Report due This report is the mechanism for determining the priority for service status of migratory children for which there is no statewide assessment or course history data available.	100
November 5	Fidelity of Strategy Implementation (FSI) Tool due This report is a self-evaluation of the district's level of strategy implementation and of the extent to which Title I-C services were delivered with fidelity during the previous fiscal year.	101
November 15	Fall Recruitment Report due This report serves as a to-do list showing all the eligible children in the district that were certified as migratory from the previous school year. Annual Migratory Child Recruitment Deadline All eligible migratory children should be certified, or re-certified, in MIS2000 for the current school year to be included in Federal reporting child counts. Note: Districts can recruit year-round; however, every effort should be made to recruit children by November 15.	102
January 31	First Semester Course History Report due Each district is required to report course history information on all current eligible migratory children in grades 9-12.	99
March 31	Annual Statewide Parent and Staff Surveys Close DEED sends surveys to the districts in early February to distribute to parents/guardians of migratory children and staff who work with migratory children. Once surveys close, district-specific results are shared with each district.	109

Date	Task	Page
May 15	Literacy Grant Application for the next fiscal year due This grant is a supplemental Title I-C grant awarded to districts who choose to participate. The goal of this supplemental grant is to support districts in improving literacy of migratory children and their families.	125
May 30	PAC Nomination Form due Districts can nominate individuals to serve on the Alaska Migrant Parent Advisory Council (State PAC). The PAC helps advise the department in the planning, implementation, and evaluation of programs.	125
June 15	Mass Withdrawal Report due This report collects the Title I-C supplemental services provided to each migratory child during the regular school year. This report also collects the withdrawal date for each child and any applicable term codes and dates, such as graduates, out of school youth, and families who have moved out of district. Literacy Grant Final Report for the current fiscal year due This report collects information regarding the implementation of the district's Title I-C Literacy Grant.	104
June 30	Second Semester Course History Report due Each district is required to report course history information on all current eligible migratory children in grades 9-12. End of Recruitment Season Final day of migratory child recruitment for the school year.	99
July 15	Summer OASIS Report due Migratory eligibility is part of the validation process in the Summer OASIS Report. Any student in the district who was certified as Title I-C eligible between July 1 to June 30 should be marked as migratory in this file.	N/A

Alaska School Districts Operating and Not Operating a Title I-C Program

Currently, 38 of Alaska's 53 school districts operate a Title I-C program.

Districts Operating a Title I-C Program
Alaska Gateway School District
Aleutians East School District
Anchorage School District
Bering Strait School District
Bristol Bay School District
Copper River School District
Cordova School District
Craig School District
Delta Greely School District
Dillingham School District
Fairbanks School District
Galena School District
Haines School District
Hydaburg School District
Kake School District
Kashunamiut School District
Kenai School District
Klawock School District
Kodiak School District
Kuspuk School District
Lake & Peninsula School District
Lower Kuskokwim School District
Lower Yukon School District
Mat-Su School District
Mt. Edgecumbe School District
Nenana School District
Nome School District
Northwest Arctic School District
Petersburg School District
Saint Mary's School District
Sitka School District
Southeast Island School District
Southwest Region School District
Valdez School District
Wrangell School District
Yakutat School District
Yukon-Koyukuk School District
Yupiit School District

Districts Not Operating a Title I-C Program
Aleutian Region School District
Annette Island School District
Chatham School District
Chugach School District
Denali School District
Hoonah School District
Iditarod School District
Juneau School District
Ketchikan School District
North Slope School District
Pelican School District
Pribilof School District
Skagway School District
Unalaska School District
Yukon Flats School District

Sample Title I-C Reports

Please note that all data and pictures of data shown throughout this guide are fictitious. This is done to protect child privacy and give the user an accurate look at systems and requirements. For information about specific reporting requirements refer to the [Title I-C Reporting](#) section starting on page 97.

Priority for Service (PFS) K-2

Due: October 15

District Name	Facility	Student ID	Last Name	First Name	Grade	Quality as PFS? (Y or N)	What method was used to determine “at risk of failing”?
District	School	456123	Rogers	Kevin	1	Y	AIMSWEB
District	School	789456	Sacchi	Joclyn	2	N	MAP Testing
District	School	987654	Anderson	Joshua	K	Y	Failing Grade in Math/ELA

Summer Services Report (SSR)

Due: September 30

Sh Seq	District Name	Facility Name	Student ID	Last Name	First Name	Grade	EOE Date	Title I-C Services Start Date	Title I-C Services End Date	Term Type	Term Date	SP Codes	COS Provision	COS SP Codes	IEP Over 20	Comments
123	District	School	222222	Gaffaney	Kristine	11	05/25/26	05/20/26	08/21/26			R, D, X1	1	R, D		
321	District	School	123456	Roust	Tanya	12	09/15/26	05/20/26	08/21/26			B, S			Y	
444	District	School	111111	Endsley	Nicole	00	11/13/27	05/20/26	08/21/26	M	08/25/26	X2				Moved to Tampa. FL

Fall Recruitment Report (FRR)

Due: November 15

District Name	Student ID	Last Name	First Name	Middle Name	GR	Facility Name	EOE	Prev Term Code IN MIS2000	Term Code UPDATED BY DISTRICT	Term Date UPDATED BY DISTRICT	Family Interview ed	C O E	COE Rece rt	Uploaded to DEED	Why not recertified	Comments
District	999999	Jones	Jaden	Vik	12	School	8/9/26		G	05/16/26	Y				Graduated	
District	888888	Long	Clark	Lee	PS	School	8/11/26				Y	Y		Y		
District	444444	Martin	Lyle		00	School	6/3/27				Y		Y	Y		
District	333333	Moore	May	M	5	School	5/12/25	M	M	03/12/25	N				EOE'd & Moved	Moved to Georgia

Course History (CH)

Due: First Semester (Fall) January 31, Second Semester (Spring) June 30, and Summer Term September 30

Sh Seq	District Name	Student ID	Last Name	First Name	Middle Name	Subject	Course Title	Course Type	Course Section	Term Type Code	Clock Hours (if course was not completed)	Grade to Date (if course was not completed)	Credits Granted	Final Subject Grade
123	District	123456	Smith	Kari	Jo	Fine Arts	Ceramics	Regular	Full Yr (01)	Quarter			0.25	A
123	District	123456	Smith	Kari	Jo	World Languages	French 3	Regular	Section A (02)	Full School Year	36	.25		
123	District	123456	Smith	Kari	Jo	Science	Biology	Regular	Section B (03)	Full School Year			1.0	B-
123	District	123456	Smith	Kari	Jo	Math	Algebra 1	Regular	Section B (03)	Full School Year			0.0	F
222	District	555555	Adam	Ryan	K	Language Arts	Honors English	Honors	Section B (03)	Full School Year			0.5	B
222	District	555555	Adam	Ryan	K	Social Studies	World History	Regular	Full Yr (01)	Semester			0.5	A
222	District	555555	Adam	Ryan	K	Career & Tech Ed	Welding Tech 2	Regular	Full Yr (01)	Semester			0.5	C

Mass Withdrawal (MW)

Due: June 15

Sh Seq	District Name	Facility Name	Student ID	Last Name	First Name	Birth Date	G R	Enroll Date	EOE Date	PFS	Withdrawal Date	Term Type	Term Date	SP Codes	COS Provision	COS SP Codes	IE P Over 20	Comments
123	District	School	222222	Jones	Ryan	10/27/08	11	8/25/25	4/17/26		4/16/26	M	5/16/26	R, D, L1	1	R, D		Moved to Fresno, CA
321	District	School	123456	Roust	Tanya	3/8/05	12	8/25/25	6/1/26	Y	5/15/26	G	5/16/26	A, X2			Y	
444	District	School	111111	Lee	Eli	12/3/22	00		7/1/25		5/15/25							

Fidelity Strategy Implementation (FSI) Report

Due: November 5

District Name: Alaska School District

Goal Area 1: English Language Arts and Mathematics

Strategy 1.1

Deliver targeted supplemental English language arts instruction for migratory children identified as PFS, EL, or at-risk of failure, based on their English language arts needs that were identified through a standards-based assessment.

Implementation Level

☐ Not Applicable (did not apply for this strategy – skip to next strategy)

☐ Not Aware	☐ Aware	☒ Developing	☐ Succeeding	☐ Exceeding
We are not aware that our program applied to implement supplemental ELA instruction for migratory children based on their ELA needs.	We are aware that our program applied to implement supplemental ELA instruction for migratory children, but we have not started developing or providing services yet.	We are developing supplemental ELA instruction for migratory children identified as PFS, EL, or at-risk of failure, but services were not provided or not targeted to needs.	We have provided sufficient ELA instruction for migratory children identified as PFS, EL, or at-risk of failure, based on their English language arts needs that were identified through a standards-based assessment.	We have provided comprehensive ELA instruction targeted to the appropriate groups based on needs identified through a standards-based assessment, and could share our successful program with other programs in the state.

How was the strategy implemented?

- ☐ Curriculum/computer-based intervention programs/software
- ☐ Distance/online instruction
- ☐ Enrichment activities/ programs
- ☐ Evidence-based instructional materials/strategies
- ☐ Migrant tutor program
- ☐ One-on-one or small group after-school tutoring
- ☐ Peer tutoring
- ☐ Push-in or pull-out intervention
- ☐ Reading groups/book studies
- ☐ Summer school
- ☐ Weekend support
- ☐ Other:

How did you use Title I-C funds?

- ☒ Certified staff
- ☐ Coordination with partners
- ☐ Educational resources/materials
- ☐ Electronic devices for check-out
- ☐ Evidence-based supplemental curriculum and materials
- ☐ Fees for instructional services
- ☐ MOUs with partners
- ☐ Paraprofessionals
- ☐ Professional development
- ☐ Software/site licenses (evidence-based programs)
- ☐ Student travel
- ☒ Support staff
- ☐ Tuition/fees
- ☐ Other:

What documentation is kept on site?

- ☐ Agendas
- ☐ Attendance logs
- ☐ Communication with parents/guardians (flyers, announcements, contact logs, etc.)
- ☒ Evaluations/surveys
- ☐ Fiscal records
- ☐ Formative assessment results
- ☐ Individual learning plans
- ☐ Interim assessment results
- ☒ Meeting notes
- ☐ MOUs
- ☐ Participation of PFS, EL, and at-risk students
- ☐ Personnel contracts
- ☐ Procedures and policies
- ☒ Sign-in sheets
- ☐ Staff schedules
- ☐ Summative assessment results
- ☐ Time and effort logs
- ☐ Other:

Comments (add a comment about what needs to improve, and what steps you are taking, if a strategy is marked "developing" or lower)

We are working on implementing this strategy, we had a year of struggles trying to hire support staff that would stay in the position and offer services. We continue to work on this by posting recruitment notices, surveying staff and families and trying to gather the necessary materials to provide the best support.

Literacy Grant Final Report

Due: June 15

State Service Delivery Plan Strategies Implementation

Strategy

In 2026-2027, the district implemented the Title I-C Literacy Grant to (check all that apply):

- ☒ increase access to literature in the homes of migratory families,
- ☒ support literacy activities that increase family engagement, and
- ☒ provide parents/guardians with strategies to support reading in the home.

Impact of the Migrant Literacy Grant

Briefly describe how the district utilized the Title I-C Literacy grant funds. How did the literacy grant help **raise academic achievement** for the district's migratory children? How did the literacy grant help the district **achieve its local Title I-C measurable program goals**?

The district utilized Title I-C Literacy Grant funds to purchase high-quality books for migratory children and to host two family-centered literacy nights. Providing students with their own books helped increase access to age-appropriate reading materials that support skill development at home, especially for children who often experience interrupted schooling. The literacy nights offered families strategies to support reading, strengthened home-school connections, and encouraged consistent literacy engagement outside the classroom.

These activities contributed to increased academic achievement by expanding opportunities for migratory students to practice reading and build foundational literacy skills. The grant-funded books and literacy events directly supported the district's Title I-C measurable program goals by promoting reading readiness, improving student engagement with literacy, and helping families reinforce learning—key components in reducing literacy gaps for migratory children.

Counts of Books and Migratory Children Served Through the Title I-C Literacy Grant

Numbers provided in the table below should align with what is reported on the Mass Withdrawal report and/or the Summer Services report.

Title I-C Literacy Grant Use of Funds	Supplemental Service Code	District Response
Total number of books (or other literature) funded through the Title I-C Literacy Grant	N/A	150
Number of eligible migratory children who received a book (or other literature) funded through the Title I-C Literacy Grant	A	50
Number of eligible migratory children who participated in a related literacy instruction/activity led by a certificated teacher whose time to conduct the activity was funded through the Title I-C Literacy Grant.	L1	25
Number of eligible migratory children who participated in a related literacy instruction/activity led by a non-certificated individual whose time to conduct the activity was funded through the Title I-C Literacy Grant.	L2	0

Supplemental Services (SP) Codes

Services are those educational or educationally related activities that:

- directly benefits a migratory child;
- addresses a need of a migratory child consistent with the State's [Comprehensive Needs Assessment](#) and [Service Delivery Plan](#);
- are evidence-based or, in the case of support services, are a generally accepted practice; and
- are designed to enable the program to meet its measurable outcomes and contribute to the achievement of the State's performance targets as outlined in the Service Delivery Plan.¹¹⁶

Instructional Supplemental Service Codes

Instructional Service: Title I-C funded¹¹⁷ supplemental services that provide evidence-based instruction to migratory children in a subject area on a regular or systematic basis, usually for a predetermined period of time. **The one-time act of providing instructional packets to a child or family does not constitute an instructional service.**

Code	Service Title	Description
L1	Literacy Event with Instructional Service by Teacher	Participation in literacy instruction/activities led by a certificated teacher. Certificated teacher must be paid using literacy grant funds.
L2	Literacy Event with Instructional Service by Non-Certificated Individual	Participation in related literacy instruction/activities led by an individual who is not certificated. The non-certificated individual must be paid using literacy grant funds.
B	Reading by Teacher	Reading instruction provided by a certificated teacher.
C	Reading by Non-Certificated Individual	Reading instructional support provided by an individual who is not certificated.
D	Math by Teacher	Math instruction provided by a certificated teacher.
E	Math by Non-Certificated Individual	Math instructional support provided by an individual who is not certificated.
F	Language Arts by Teacher	Language Arts instruction provided by a certificated teacher.
G	Language Arts by Non-Certificated Individual	Language Arts instructional support provided by an individual who is not certificated.
H	Science	Science instructional support provided by a certified teacher or an individual who is not certificated.
R	High School Credit Accrual	Instruction in courses that accrue credits needed for high school graduation provided by a certificated teacher for students on a regular or systematic basis, usually for a predetermined period of time. This includes correspondence courses taken by a student under the supervision of a certificated teacher. Please also provide an SP code for the corresponding content area in which the service was provided for the students reported as receiving High School Credit Accrual.
S	Social Studies	Social Studies instructional support provided by a certificated teacher or an individual who is not certificated.
T	Other Academic Content or Study Skills Support	Study skills, instructional support in other academic content areas such as art and music.
U	Career and Technical Education	Title I-C funded instructional support in career and technical education.
V	Preschool	Title I-C funded preschool.

¹¹⁶ Non-Regulatory Guidance, Chapter V, #A1

¹¹⁷ Title I-C-funded is any supplemental service that is funded in whole or in part with Title I-C funds.

Support Supplemental Service Codes

Support Service: Title I-C funded¹¹⁸ supplemental services to provide support and advocacy to migratory children. These services include, but are not limited to, health, nutrition, counseling, and social services for migratory children, necessary educational supplies, and transportation.

Code	Service Title	Description
A	Literacy Support	Book(s) or other literature funded through the Title I-C Literacy Grant.
W	Counseling	Services to help a student better identify and enhance his or her educational, personal, or occupational potential; relate his or her abilities, emotions, and aptitudes to educational and career opportunities; utilize his or her abilities in formulating realistic plans; and achieve satisfying personal and social development. These activities take place between one or more counselors and one or more students as counselees, between students and students, and between counselors and other staff members. The services can also help the child address life problems or personal crisis that result from the culture of migrancy. These counseling services are outside of the regular counseling provided to all district students.
X1	Educational Support Resources	Support services to provide educational resources to migratory children. Examples include books for the home, school supplies, and technology support.
X2	Social Work, Outreach or Advocacy, Nutrition, Health/Safety Education, and Family Support Services	Support services other than counseling and educational resources provided to migratory children funded by the Title I-C program. Examples include health, nutrition, transportation, necessary winter clothing, and related social services.
P	Academic Success Coaching	Support services to provide academic success coaching to migratory students, which could include progress monitoring and assistance when a student is at risk of failing to meet the challenge State academic standards.

¹¹⁸ Title I-C-funded is any supplemental service that is funded in whole or in part with Title I-C funds.

Templates / Forms

Sample Continuation of Services Approval Form

This form must be submitted to the Title I-C Coordinator for approval **prior** to serving a child that met the end of their migratory eligibility (EOE'd).

Student Information

Student Name: _____ Alaska Student ID: _____

Birth Date: _____ Grade: _____

End of Eligibility (EOE) Date: _____

COS Proposal

1. Check the box that applies to this request for Continuation of Services:

- ☐ A child's eligibility ends during the school term and the district provides services ***until the end of the term*** (fall, spring, summer).
- ☐ A child's eligibility ends and the district provides services for ***an additional school year*** because comparable services are not available through other programs.
- ☐ A district continues to serve students who were eligible for services in secondary school through ***credit accrual programs until they graduate***.

2. List of Title I-C funded service(s) to be **continued**:

3. Explanation of why the educational service(s) listed above should be continued:

4. Explanation of the process used to determine that the Title I-C program is the only resource available to meet this student's need for the continuation of services(s) listed above:

Requestor Information

Requestor: _____ Title: _____

Email: _____ Phone: _____

Title I-C Coordinator Review

- ☐ **REQUEST ACCEPTED**
COS Services End Date: _____
Reason for Decision: _____
- ☐ **REQUEST DECLINED**
Reason for Decision: _____

Title I-C Coordinator: _____ Date: _____

Sample Recruiter Observation Skills Form

The Title I-C Program is responsible for annually evaluating the recruitment practices of individual recruiters ([32 CFR 200.89\(d\)\(2\)](#)). Evaluating/observing recruiters is one part of a larger system of quality controls for proper identification and recruitment of eligible migratory children. Results of the observations should be used to plan professional development and other supports to assist the recruiter in effectively identifying and recruiting migratory children.

Recruiter Information

Recruiter Name: _____ Observer's Name: _____

District: _____ Date of Observation _____

Interviewing Families

Skill	Met?
Brings materials needed to conduct interview and complete COE	☐
Uses proper attire	☐
Introduces themselves	☐
Clearly explains the Title I-C program to parents/guardians	☐
Uses Conversational Tone / Approachable	☐
Uses Language Family Speaks (or ensures translator is present)	☐
Asks Screening Questions	☐
Takes Notes During Interview	☐
Actively Listens	☐
Repeats/Rewords Questions	☐
Asks Follow-up Questions	☐
Asks Open Ended Questions	☐
Confirms Information with Family	☐

Program Understanding

Skill	Met?
Understands Migratory Child Eligibility Requirements • Child • Qualifying Move • As, With, or To Join/Precede • Migratory Worker	☐
Accurately completes COEs	☐
Accurately completes COE Recerts	☐
Knowledgeable about district's Title I-C services	☐
Utilizes Title I-C Resources (e.g., manuals, scripts, district resources)	☐

Communication / Organization

Skill	Met?
Keeps supervisor updated on recruitment efforts	☐
Effectively coordinates and collaborates	☐
Successfully prioritizes work	☐
Capably works independently	☐
Efficiently manages time	☐
Consistently meets deadlines	☐
Has a clear system to document leads and follow-up needed	☐
Follow through is consistent	☐
Careful to not promise families more than is possible	☐

Comments

Technical Assistance Visit Preparation Checklist

Each school year, DEED conducts technical assistance visits with Title I-C staff. During these visits, a staff member from DEED will conduct a thorough review of the district's identification and recruitment procedures, migratory child files, and compliance with eligibility requirements.

Checklist

- ☐ Files organized according to recommended DEED procedures.
- ☐ Title I-C reports and lists readily available and filed for easy access.
- ☐ Identification & Recruitment materials are up-to-date and readily available.
- ☐ Knowledgeable about the supplemental services provided to migratory children.
- ☐ Knowledgeable about the mass withdrawal (MW) and summer services process, including reporting.
- ☐ Documented identification and recruitment procedures.
- ☐ Written Identification and Recruitment (ID&R) plan.
- ☐ Written procedures for collection of migratory parent and staff surveys.
- ☐ Written Title I-C staff job descriptions.
- ☐ Written Quality Control Plan on file.
- ☐ Maps of district boundaries and common fishing areas readily available.
- ☐ Access to the [Alaska Migrant Web System](http://ak.msedd.com) (ak.msedd.com).
- ☐ Knowledgeable about the Web System (MIS2000).

Potential Resources

[District Level Guiding Documents Template](http://education.alaska.gov/ESEA/TitleI-C/docs/District-Level-Guiding-Template.docx)

education.alaska.gov/ESEA/TitleI-C/docs/District-Level-Guiding-Template.docx

[Alaska School District Map](http://education.alaska.gov/pdf/schoolmap.pdf)

education.alaska.gov/pdf/schoolmap.pdf

[Alaska Schools and Education Map CDO Website](http://experience.arcgis.com/experience/c89597c7ea574a42b7e01d5e09cb69d2)

experience.arcgis.com/experience/c89597c7ea574a42b7e01d5e09cb69d2

[Fall Training Materials](http://livebinders.com/play/play/2029583)

livebinders.com/play/play/2029583

Questions for DEED

DEED Title I-C Program Contacts

DEED Staff Photo



DEED Staff Contact Information and Roles

Sarah Emmal, Title I-C Program Manager

Email: sarah.emmal@alaska.gov

Phone: 907-465-3826

- Program Guidance and Questions
- Continuous Improvement Cycle
 - Needs Assessment, Service Delivery Planning, and Evaluation
- Title I-C Funding (e.g., Allocations, Uses of Funds, Applications)
 - Grants Management System (GMS)
 - Consolidation of Title I-C Funds into a Title I-A Schoolwide Program
- State Parent Advisory Council (PAC)
- ESEA Monitoring
- ESEA Federal Programs Weekly Newsletter



Jannessa Luerra, Title I-C Data Specialist

Email: jannessa.luerra@alaska.gov

Phone: 907-465-8231

- MIS2000 Support and Technical Assistance
- Title I-C Reporting
 - Mass Withdrawal (MW), Summer Services (SSR), Course History (CH), Fall Recruitment (FRR), Priority for Service (PFS)
 - Fall OASIS, Participation Rate (P-Rate), Summer OASIS
- Fall Training on the Identification and Recruitment of Migratory Children
- Technical Assistance (TA) Visits
- National Title I-C Database (MSIX) Coordinator



Felicia Wells, Title I-C Identification & Recruitment Specialist

Email: felicia.wells@alaska.gov

Phone: 907-465-8722

- Re-interviewing - Statewide and Technical Assistance Calls
- Literacy Grant – Paper Applications and Final Reports
- Fall Training on the Identification and Recruitment of Migratory Children
- Technical Assistance (TA) Visits
- COE Quality Control Reviews
- Website and Email Contact List
- Multi-Factor Authentication (MFA) Support



Jacqueline Drulis, Title I-C Eligibility Specialist

Email: jacqueline.drulis@alaska.gov

Phone: 907-269-7987

- COEs - MIS2000 Entries, Eligibility Determinations, COE Submissions
- Eligibility Questions
- Registration for Fall Training
- MIS2000 Support and Technical Assistance
- Title I-C Forms: Designated SEA Reviewer, and Web System User Access