

# Idaho Migrant Education Program Quality Control Policies & Procedures

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# Introduction

The Idaho Migrant Education Program (MEP) Identification and Recruitment (ID&R) Quality Control Plan provides a process to ensure that only eligible migrant children are recruited for the MEP and that all eligibility decisions are supported by appropriate documentation. The Plan reflects the statutory requirements of 34 CFR Part 200 Sec. 200.89 MEP allocations; re-interviewing; eligibility documentation; and Quality Control (see following page). All local projects that receive MEP funding from the Idaho State Department of Education must develop and follow an approved local quality control plan as part of the annual Consolidated Federal and State Grant Application process. The plan describes how the LEA intends to follow the guidelines and procedures delineated in the Idaho MEP State plan.

The Idaho MEP quality control goals are:

- To identify and recruit all eligible migrant children residing in Idaho.
- To ensure that proper MEP eligibility determinations are made in a collaborative manner by MEP personnel.
- To ensure that proper MEP eligibility determinations are supported by accurate documentation.

These goals will be accomplished by the following three components:

- Recruiter quality controls
- Proper eligibility determinations and documentation submission quality controls
- Prospective re-interviewing

Each component is of equal importance; all three must be implemented to achieve high quality ID&R in the Idaho MEP.

**Note:** We anticipate that regulations for Migrant Education will be updated to reflect Every Student Succeeds Act language and changes to ESEA based on the new law. This will be updated at that time. 12/6/16

***Federal Register: July 29, 2008 Volume 73, Number 146 Rules and Regulations Part IV  
United States Department of Education***

**34 CFR Part 200**

**Improving the Academic Achievement of the Disadvantaged; Migrant Education Program; Final Rule**

**Sec 200.89 MEP Allocations; Re-Interviewing; Eligibility Determination; and Quality control**

(d) Responsibilities of an SEA to establish and implement a system of quality controls for the proper identification and recruitment of eligible migratory children. An SEA must establish and implement a system of quality controls for the proper identification and recruitment of eligible migratory children on a statewide basis. At a minimum, this system of quality controls must include the following components:

- (1) Training to ensure that recruiters and all other staff involved in determining eligibility and in conducting quality control procedures know the requirements for accurately determining and documenting child eligibility under the MEP.
- (2) Supervision and annual review and evaluation of the identification and recruitment practices of individual recruiters.
- (3) A formal process for resolving eligibility questions raised by recruiters and their supervisors and for ensuring that this information is communicated to all local operating agencies.
- (4) An examination by qualified individuals at the SEA or local operating agency level of each COE to verify that the written documentation is sufficient and that, based on the recorded data, the child is eligible for MEP services.
- (5) A process for the SEA to validate that eligibility determinations were properly made, including prospective re-interviewing as described in paragraph (b)(2).
- (6) Documentation that supports the SEA's implementation of this quality-control system and of a record of actions taken to improve the system where periodic reviews and evaluations indicate a need to do so.
- (7) A process for implementing corrective action if the SEA finds COE's that do not sufficiently document a child's eligibility for the MEP, or in response to internal State audit findings and recommendations, or monitoring or audit findings of the Secretary

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

## Training

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

The Idaho Department of Education (SDE) carries out the following required trainings:

- A. Idaho MEP policy requires family liaisons/recruiters who will be completing a COE during the school year to attend one fall and one spring State training, and one fall and spring Regional training.
- B. Regional ID&R coordinators are required to attend one national migrant conference and 2 State trainings. Regional ID&R coordinators will conduct two regional trainings for family liaisons/recruiters and district MEP directors/coordinators.
- C. District MEP directors/coordinators will be provided with training during a portion of the fall and spring State trainings and are encouraged to attend regional trainings.
- D. Liaisons will meet with the regional ID&R coordinator twice per month for individual training and support. Directors will meet with the regional ID&R coordinator at least once per month.
- E. Migrant family liaisons/recruiters will partake in additional trainings as SDE sees necessary, including additional one-on-one training by the regional ID&R coordinator.

## New Recruiter Certification Procedures

Idaho MEP policy requires that new recruiters demonstrate that they can conduct interviews with migrant families and complete a COE on their own.

The recruiter is required to complete the following requirements:

- (1) New migrant family liaisons/recruiters will be trained by the SDE and regional ID&R coordinators on COE completion, ID&R and eligibility
- (2) Fieldwork
  - a. Observe Interviewing and COE protocol—minimum of 3 interviews and COEs conducted by a regional ID&R coordinator or experienced migrant family liaison/recruiter
  - b. Complete Interview and COE protocol—successful completion of a minimum of 3 COE's while accompanied by a regional ID&R coordinator or experienced migrant family liaison/recruiter

When a migrant family liaison has completed these requirements, the Regional ID&R Coordinator will notify SDE and request the recruiter be certified. A certificate will then be issued.

## Supervision, Annual Review and Evaluation

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

The Idaho Department of Education requires supervision, annual review and evaluation of individual migrant family liaisons/recruiters by their LEA supervisor.

The Idaho MEP policy for the completion of the supervision, annual review and evaluation of the identification and recruitment (ID&R) practices of individual recruiters incorporates the following procedures:

- a. LEA directors will review a sample of COEs and any COE Error Correction Forms received as part of the liaison's annual evaluation.
- b. Ongoing problems with a migrant family liaison/recruiter must be reported to the LEA migrant director/coordinator by the State MEP or Regional ID&R Coordinator.
- c. If the LEA director has concerns about the liaison's quality of work completing COEs, he or she will contact the regional ID&R coordinator to request additional training and support for the liaison.
- d. The MEP Recruitment Log is reviewed and signed by the LEA migrant director/coordinator monthly to assure proper documentation is being maintained.
- e. Regional ID&R coordinators are evaluated by their home districts with feedback provided by the SDE through the collection of surveys of the LEA liaisons and directors they serve, evidence through regional contact logs, and direct feedback from SDE MEP staff.

The above terms must be met by LEA migrant programs to ensure the Idaho MEP is in compliance with the OME rules and regulations.

## Process for Resolving Eligibility Questions

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

The Idaho department of Education (SDE) develops and implements a process for resolving eligibility questions and ensures that information on the process is communicated to LEA migrant directors/coordinators and family liaisons/recruiters.

Idaho MEP policy for resolving eligibility questions raised by migrant family liaisons/ recruiters and regional ID&R coordinators incorporates the following procedures (see Eligibility Determination Protocol (Appendix A).

LEA Migrant family liaisons/recruiters eligibility questions are sent to regional ID&R coordinator. If regional ID&R coordinator is unable to answer eligibility questions, it is then forwarded on to the State MEP coordinator.

If the State MEP coordinator and State MEP director are unable to answer the eligibility question, the State MEP Director will forward the eligibility question to the USDE Office of Migrant Education (OME). Answers received by the SDE from OME will be disseminated to all districts as soon as possible. Questions and responses will also be used for state and regional training.

## Certificate of Eligibility (COE) Quality Control Procedures

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

The Idaho Department of Education (SDE) Migrant Education Program develops and implements COE quality control processes.

Idaho MEP policy for providing quality control of the COE incorporates the following procedures:

- A. As directed by the Idaho MEP, regional ID&R coordinators and the Idaho MEP administrative assistant review 100% of COEs submitted by LEA migrant family liaisons/recruiters. See flow of COE (Appendix B).
- B. If a COE passes the “Review of Certificate of Eligibility—Errors/Issues” examination (see Appendix C), the COE is placed in the official state files maintained at the Idaho State department of education and held for 10 years.
- C. If a COE does not pass the “Review of Certificate of Eligibility—Errors/Issues” examination, the Idaho MEP and LEAs proceed with the following process:
  1. The COE Error Correction form is used by the regional ID&R coordinator and State MEP to document changes/corrections made to the COE after the original interview has taken place. (Appendix D)
  2. The regional ID&R coordinator or Idaho MEP program specialist identifies the errors or issues on a COE.
  3. The COE Error Correction form and the original COE are sent back to the appropriate person to make corrections.
  4. The family liaison/recruiter must make the necessary changes to the COE determined to have errors/issues on all three copies of the COE: original, LEA copy and parent copy.
    - a. If corrections require parent initials, the recruiter visits the family to secure them.
    - b. If parent initials CANNOT be obtained, the recruiter checks the “Changes Without Parent Initials” box. If the changes don’t affect the eligibility of the student(s), the recruiter must sign on the recruiter line and the LEA migrant director/coordinator must sign in the appropriate place.
    - c. All corrections are properly initialed in red by the recruiter.
  5. The recruiter gives/sends the COE and COE Error Correction form to the regional ID&R coordinator for verification that changes have been made.
  6. The regional ID&R coordinator signs the Error Correction form to verify corrections have been made.
  7. The regional ID&R coordinator forwards updated COE and Error Corrections form to the Idaho MEP for final review and approval in the Migrant Student Information System (MSIS).

If the COE correction form is coming from the State MEP, it should be returned for State files and a copy retained for LEA files. Otherwise, all COE Correction Forms are maintained at the LEA level as evidence of quality control documentation.

- D. If a COE does not pass the “Review of Certificate of Eligibility—Errors/Issues” examination, and through the correction process the family appears to NOT qualify for the Idaho migrant education program, the Idaho MEP will follow the following steps:
1. A memo will be sent to the LEA explaining the findings.
  2. The LEA will have 30 days to contest the findings and submit additional evidence in written form to the Idaho MEP.
  3. If the LEA does not contest the findings and accepts the findings then the Idaho MEP will void the family COE and follow up with a memo to the LEA stating such. It is then the LEA's responsibility to communicate the findings to the family.

## Validation of Eligibility Determinations: Prospective Re-Interviewing

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

Idaho is committed to following the federal requirement that each state Migrant Education program implements a re-interview process to comply with federal regulation CFR 200.89.

The Idaho State Department of Education (SDE) utilizes rolling re-interviews carried out by districts working together with neighboring districts to carry out these re-interviews for federal compliance and quality control. In addition, districts report the results for each re-interview through the Migrant Student Information System (MSIS). Every three years, the Idaho MEP contracts with an out of state agent to conduct 50 additional re-interviews.

The Idaho migrant education program rolling re-interview procedures are as follows (also see Appendix D-F):

1. The district selects a district or districts with which to collaborate. Districts will run a report from MSIS that provides a randomized list of children whose COE has been approved by the Idaho MEP since September 1<sup>st</sup> of the current year.
2. The re-interviews will occur throughout the year as families and re-interviewers are available, but at least two each per district will be completed by the end of November, February, and April.
3. The liaison (or other) will print the list, select the students and prepare the documents. He or she will provide the documents to the re-interviewing liaison.
4. Information on any family found not to qualify by the re-interviewer will be followed immediately by a second re-interview by the regional ID&R coordinator.
5. If the family is found not to qualify the information will be forwarded to the Idaho MEP immediately. Any irregularities (whether or not they result in a change in qualification) will also be used by the district or regional ID&R coordinator for future local or regional training.
6. Re-interviewing results will be submitted in the Annual Re-Interviewing Summary Report. (Appendix G).

## Documentation

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

This document will be the official representation of the Idaho MEP Quality Control Policies and procedures and the implementation there of.

A record of actions taken to improve the system, where periodic reviews and evaluations indicate a need, will be documented, compiled and held at both the LEA and SEA. examples of such documentation shall include, but not be limited to: completed COEs with signatures validating accuracy, COE Error Correction forms, training participation certificates and/or sign-in sheets, migrant recruiter log, prospective re-interviewing documentation, Re-Interviewing Summary Reports, etc.

## Process of Corrective Action

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

In general, the process for corrective action should the SEA identify a COE that does not sufficiently document a child's eligibility is listed under the COE Quality Control Procedures (4) of this document.

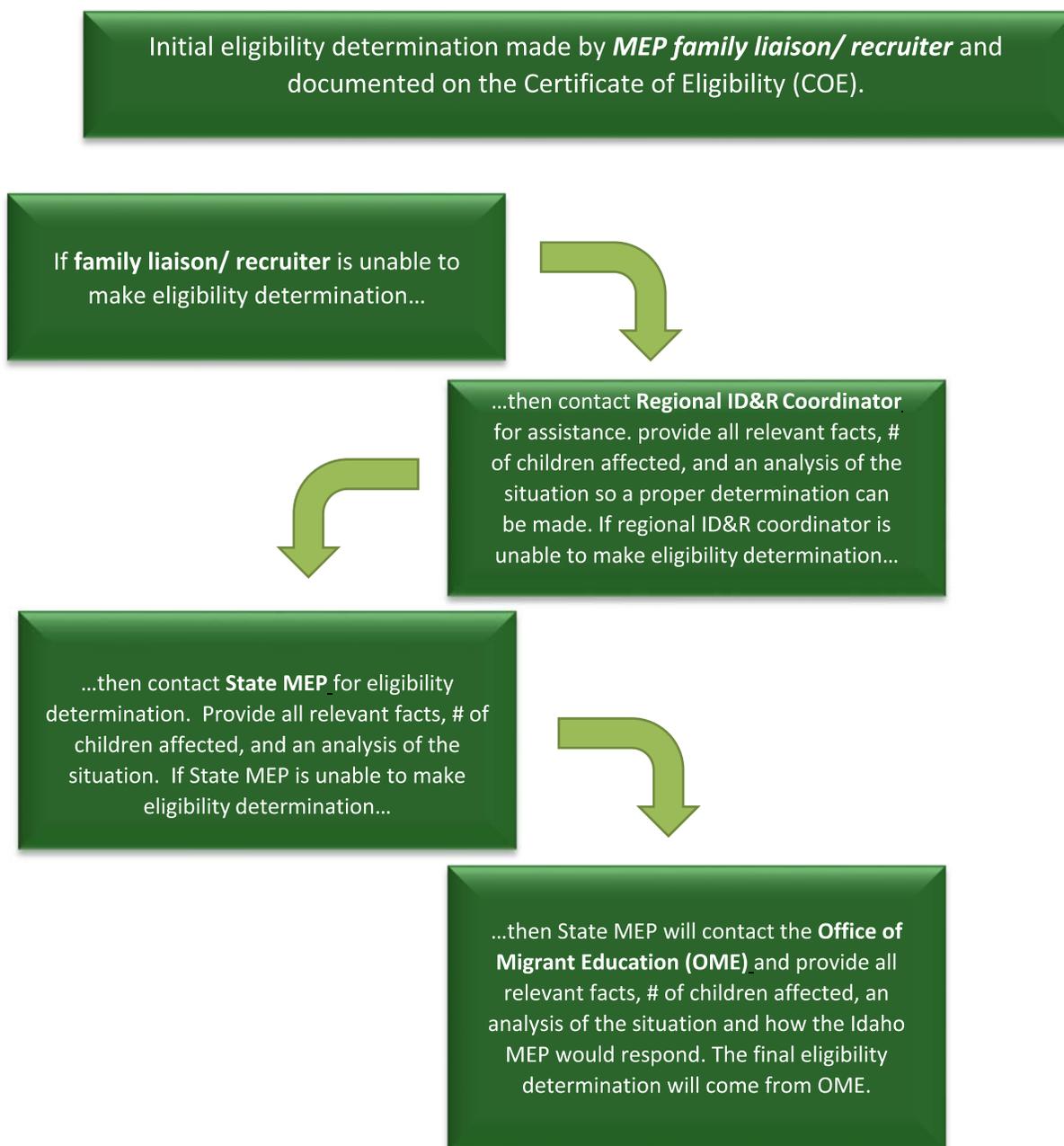
If a district receives errors on COEs frequently as shown by the error correction process, the regional ID&R coordinator will work with the liaison/recruiter to provide re-training and support. The LEA director/coordinator will also work with the regional ID&R coordinator at least monthly to ensure adequate support of the program and quality control for student identification.

If the problem does not improve, the Idaho MEP director and/or coordinator will work with the LEA director/coordinator to improve systems to assure that quality control guidelines provided in the Consolidated Federal and State Grant Application are robust and utilized fully. If these efforts are unsuccessful, the district will be advised to replace a staff member shown to recruit ineligible families.



# Idaho Migrant Education Program

## Eligibility Determination Protocol (Appendix A)





# Idaho Migrant Education Program

## Flow of the COE (Appendix B)





# Idaho Migrant Education Program

## COE CORRECTION FORM (Appendix C)

COE Received Date \_\_\_\_\_ District \_\_\_\_\_

Recruiter \_\_\_\_\_

Regional ID&R \_\_\_\_\_

Coordinator \_\_\_\_\_

First Child Name	Qualifying Arrival Date	COE #

Error requiring correction: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

*Please sign and return this form after corrections or alterations are made to the COE.*

### Regional ID&R Coordinator:

Verified by \_\_\_\_\_ Date \_\_\_\_\_

**Changes without parent initials**

Errors were made on the COE while documenting the eligibility of the child(ren). Corrections were necessary and the parent's initials were unable to be obtained. The corrections do not change the eligibility of the child(ren), therefore, the recruiter has made the necessary corrections and initialed them accordingly.

Family Liaison/Recruiter Signature: \_\_\_\_\_

Regional ID&R Coordinator or Supervisor Signature: \_\_\_\_\_

# Idaho Migrant Education Program

## District Rolling Re-Interview Guide (Appendix D)

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### Part I: Before the Interview

#### *District Steps to prepare for re-interviews:*

1. Run a random sample using the MSIS Re-Interview Randomized List Worksheet and select 2 families.
2. Contact the re-interviewer for availability.
3. Contact the families selected to schedule re-interviews at parents' convenience.
4. If the family has moved or is not able to be contacted, pull the name of an alternate student (see sampling instructions) and contact that family for availability.
5. Copy the COE of the family selected and highlight the name of the student to be re-interviewed.
6. Provide packet for the re-interviewer:
  - a. Questionnaire (English and Spanish)
  - b. Sealed copy of COE in an envelope
  - c. Write the name and EDUID of the student selected on the outside of the envelope containing the COE copy.
7. The initial qualifying family liaison accompanies the re-interviewer to introduce the re-interviewer to the parent(s).

#### *Re-interviewer Steps to Prepare for the re-Interview:*

1. Provide the days and times that you are available to the district requesting that you re-interview families.
2. DO NOT call the subject ahead of time to prearrange a time for the interview. The original liaison will schedule the appointment and inform you the date and time.
3. Determine a place to meet with original liaison before the re-interview (i.e. school, at the family's home, etc.).
4. When you arrive at the home, if the subject is home, proceed to **PART II**.
5. If the subject is **NOT** home, check the appropriate box on the questionnaire. The district will attempt to reschedule the re-interview and contact you with to proceed.

6. If the subject has moved away, check the appropriate box on the questionnaire.

## Part II: Conducting the Interview

1. Whenever possible have the initial qualifying family liaison introduce you to the parent(s).
2. The original liaison should leave the immediate area during the re-interview itself. Decide where this will be in advance if possible (i.e. car, other room, etc.)
3. Explain the purpose of the visit and any risks to the respondent. For example:

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

(If the subject declines the interview, thank the subject and mark it on the questionnaire.)

4. Follow the questionnaire in the order it appears.
5. DO NOT leave any part of the questionnaire blank. If the subject does not wish to respond, write DID NOT RESPOND in the space provided.
6. Remove a copy of the subject's COE from the sealed envelope and compare answers from the re-interview.
  - If any answer received during the re-interview is different than the original COE, explore why by asking parents further questions on any differences. Note the follow-up comments by the parents on the additional page provided for differences. You may ask follow up questions if an answer is unclear or ambiguous.
7. Obtain signatures.
8. Make the final determination and record any notes as needed after completing the interview.

## Part III: After the Interview

1. Bring the original liaison back into the room
2. Ask the parents if they have any questions for either of you. (The district should follow up as needed.)
3. Thank the subject for his or her cooperation and participation in the re-interview process.
4. You may wish to leave a district program brochure, children's book or information on the district PAC with the parents.

## Part IV: Back at the Office – District responsibilities

### *If the child is found to be eligible:*

1. Enter the student information and results into the Annual Migrant Re-Interview Summary in MSIS in the Data Collection area. If you add names and results as you complete the re-interviews, the final report takes only a few minutes of reflection at the end of the process.
2. By the end of May you should have complete a minimum of 6 re-interviews, provided you have enough new students.
3. Complete the reflection questions in the Annual Migrant Re-Interview Summary and submit by the end of May.

### *If the child is found to be ineligible:*

1. **CONTACT THE REGIONAL ID&R COORDINATOR AND MEP COORDINATOR FOR ASSISTANCE IN MOVING FORWARD.**



# Idaho Migrant Education Program Child Eligibility Re-Interview Questionnaire (Appendix E)



### Child/Student Information

Name:		Date of birth:	
District Name and #:		EDUID #:	Grade:

### Visit:

<input type="checkbox"/> Date of Attempt #1		<input type="checkbox"/> Home	<input type="checkbox"/> Not Home	<input type="checkbox"/> Declined interview
<input type="checkbox"/> Date of Attempt #2		<input type="checkbox"/> Home	<input type="checkbox"/> Not Home	<input type="checkbox"/> No longer in residence
<input type="checkbox"/> Verified Eligibility from other locations (explain)				
<input type="checkbox"/> Other (i.e. phone re-interview)				

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

Interviewee Name:		Relationship to child/student:	
Interviewee Name:		Relationship to child/student:	
Qualifying worker:		Relationship to child/student:	
Home address:			

### Person(s) Interviewing

Interviewer:		Date of Interview:	
Person Accompanying Interviewer:		Title:	
Town/City of Interview:		State of Interview:	
Language(s) of Interview:		COE Original Interviewer:	

**Qualifying Questions**

1. Have you or your spouse moved and taken your child(ren) to find work in agriculture or fishing work?	<input type="checkbox"/> Yes <input type="checkbox"/> No
2. When was the most recent move?	
3. What specific kind of work were you looking for?	
4. What kind of work did you apply for? <i>(Note if temporary or seasonal)</i>	
5. Did you get the job? What kind of work did you obtain? <i>(Note if temporary or seasonal)</i>	
6. Did this work play an important part in providing a living for your family?	<input type="checkbox"/> Yes <input type="checkbox"/> No
7. When you moved to obtain this work, where did you move from?	
8. Where did you move to?	
9. At the time of this move did <b>(name of child)</b> move with or to join you?	
<input type="checkbox"/> Yes, moved with <input type="checkbox"/> Yes, moved to join. Date: _____ <input type="checkbox"/> No <input type="checkbox"/> Self	
10. Open the copy of the original COE that you brought. Compare it with the re-interview. Is the information the same?	
<input type="checkbox"/> Yes: Continue	<input type="checkbox"/> No: Use the following information to solicit more information.

**Signatures**

<b>The Information as obtained and documented from this interview is correct to the best of my knowledge.</b>			
<b>Parent Signature:</b>		<b>Date:</b>	
<b>Interviewer Signature:</b>		<b>Date:</b>	
<b>District of interviewer:</b>			

**Eligibility (complete after the visit)**

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The student is eligible:  Yes  No

Reasons for the determination:

Eligible on a move other than on the COE. *(Please describe)*



# Programa Educación Migrante de Idaho

## Cuestionario de Re-entrevista de Elegibilidad del Niño (Appendix F)



### Información del Niño/Estudiante

Nombre:		Fecha de nacimiento:	
Distrito nombre & #		EDUID #:	Grado:

### Visita

<input type="checkbox"/> Fecha de Intento #1		<input type="checkbox"/> Casa	<input type="checkbox"/> No está en Casa	<input type="checkbox"/> Renuncia Entrevista
<input type="checkbox"/> Fecha de Intento #2		<input type="checkbox"/> Casa	<input type="checkbox"/> No está en Casa	<input type="checkbox"/> Ya no vive en la residencia
<input type="checkbox"/> Elegibilidad Verificada desde otra localidad ( <i>Explicar</i> )				
<input type="checkbox"/> Otro ( <i>por ejemplo entrevista por teléfono</i> )				

### Persona(s) entrevistada(s) (*Intente entrevistar a la persona que firmo el COE primero*):

Nombre del entrevistado:		Relación con el niño(a)/estudiante:	
Nombre del entrevistado:		Relación con el niño(a)/estudiante:	
Trabajador calificado:		Relación con el niño(a)/estudiante:	
Dirección del hogar:			

### Persona(s) entrevistando

Entrevistador:		Fecha de la Entrevista:	
Persona acompañando al entrevistador:		Ocupación:	
Ciudad (Entrevista):		Estado (Entrevista):	

Idioma(s) de la Entrevista:		Entrevistador del COE Original:	
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**Preguntas de Calificar**

11. ¿Se ha mudado usted o su pareja llevando a su hijo(s) para encontrar trabajo en la agricultura o la pesca?	<input type="checkbox"/> Sí <input type="checkbox"/> No
12. ¿Cuándo fue la última vez que usted se movió?	
13. ¿Qué tipo de trabajo específico estaba usted buscando?	
14. ¿Qué clase de trabajo aplicó usted? <i>(Anotar si el trabajo es temporal o de temporada)</i>	
15. ¿Obtuvo usted el trabajo? ¿Qué clase de trabajo obtuvo usted? <i>(Anotar si el trabajo es temporal o de temporada)</i>	
16. ¿Supone este trabajo una parte importante para el mantenimiento de su familia?	<input type="checkbox"/> Sí <input type="checkbox"/> No
17. ¿Cuándo se mudó usted para obtener este trabajo, de donde se mudó usted?	
18. ¿A dónde se mudó usted?	
19. ¿En qué momento de esta mudanza <b>(nombre del niño estudiante)</b> se mudó con usted o vino para acompañarle?	
<input type="checkbox"/> Si, se mudó con <input type="checkbox"/> Si, se mudó para acompañarme en Fecha: <input type="checkbox"/> No <input type="checkbox"/> Solo(a)	
20. Abra la copia del COE original que usted trajo. Compare con la re-entrevista. ¿Es la misma información?	
<input type="checkbox"/> Sí: continua con elegibilidad	<input type="checkbox"/> No: usa la siguiente página a solicitar más información

**Firmas**

<b>La información obtenida de esta entrevista en este documento es correcta en lo mejor de mi conocimiento.</b>			
Firma del padre:		Fecha:	

Firma del entrevistador:		Fecha:	
Distrito de entrevistador:			

**Elegibilidad (completar después de visita)**

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Estudiante es elegible: <input type="checkbox"/> Sí <input type="checkbox"/> No
Razones para determinación:
Elegible en otra mudanza diferente que la del COE. <i>(Por favor describe)</i>

# Idaho State Migrant Education Program



## Migrant Re-Interview Summary Report in MSIS (Appendix G)

<b>District:</b>				<b>School Year:</b>		
1. What process was used by the district to complete the re-interview process?						
2. Re-interviewed students and results				<b>Sampling procedure: RANDOM or EDUID</b>		
<b>EDUID</b>	<b>Name</b>	<b>Original Liaison</b>	<b>Re-interviewer</b>	<b>Re-interviewer District</b>	<b>Date</b>	<b>Result</b>
3. What was the defect rate?		_____%				
4. What concerns or difficulties, if any, were noted as part of the re-interview process? How will they be addressed or corrected for the coming year?						
5. What training priorities, if any, were identified through the process?						

