



New York State Office of the State Comptroller
Thomas P. DiNapoli

Division of State Government Accountability

Selected Aspects of the Migrant Education Program

State Education Department



Report 2014-S-48

May 2015

Executive Summary

Purpose

To determine whether the State Education Department (Department) properly oversees the Migrant Education Program (Program) to ensure that it complies with all requirements and achieves its program goals.

Background

The Migrant Education Program (Program) is a federal grant program authorized by the Federal Elementary and Secondary Education Act. A migrant child is anyone between 3 and 21 years old whose parent, guardian, or spouse – or the child him- or herself – is a migratory agricultural worker or fisher, and who has moved between school districts within the past three years to obtain temporary or seasonal employment in an agricultural or fishing activity as a principal means of livelihood. The Program’s goals are to ensure that all eligible students reach challenging academic standards and graduate with a high school diploma (or its equivalency), and/or participate in life skills as well as career education services and, to the extent practicable, successfully complete vocational instruction to college occupational programs. The Department is responsible for administering the program and ensuring the intended goals are met. To meet this obligation, the Department contracted for five State University of New York (SUNY) campuses and four Boards of Cooperative Education Services (BOCES) to establish the Migrant Education Tutorial Services (METS) program teams, which deliver supplemental academic and advocacy services to migrant children throughout the State. SUNY campuses also operate three statewide resource centers devoted to the Program.

Key Findings

- For the 2012 and 2013 program years, the Program failed to meet three of ten measurable performance outcomes and three of seven broader Program goals. For example, one Program goal is to have all migrant students who have been enrolled in a school in New York since the ninth grade earn a high school diploma at the same rate as children in the “economically disadvantaged” subgroup of students. For 2013, however, the graduation rate was 40 percent for migrant students, but 69 percent for a similar group of economically disadvantaged students. In addition, migrant students were less proficient in English and mathematics than other economically disadvantaged students.
- The Department did not complete in a timely manner all federally required guidance documents necessary to establish Program goals, monitor METS operations, and measure performance. These delays, in turn, hampered the availability of timely and relevant performance data that managers should have to effectively oversee the Program.
- A significant portion of METS staff face challenges obtaining student performance data due to a lack of linkages with public schools. This data is necessary to monitor and evaluate student performance, as well as to adjust services as needed.

Key Recommendations

- Develop methods to periodically provide evaluation results both at the METS level and Program-wide to monitor performance against established goals.

- Establish a method to facilitate the exchange of information between METS programs and school districts.

Other Related Audit/Report of Interest

[State Education Department: Compliance With the Safe Schools Against Violence in Education Act \(2013-S-71\)](#)

State of New York
Office of the State Comptroller

Division of State Government Accountability

May 15, 2015

Ms. Elizabeth R. Berlin
Acting Commissioner
State Education Department
89 Washington Avenue
Albany, NY 12234

Dear Ms. Berlin:

The Office of the State Comptroller is committed to helping State agencies, public authorities, and local government agencies manage government resources efficiently and effectively and, by so doing, providing accountability for tax dollars spent to support government operations. The Comptroller oversees the fiscal affairs of State agencies, public authorities, and local government agencies, as well as their compliance with relevant statutes and their observance of good business practices. This fiscal oversight is accomplished, in part, through our audits, which identify opportunities for improving operations. Audits can also identify strategies for reducing costs and strengthening controls that are intended to safeguard assets.

Following is a report of our audit entitled *Selected Aspects of the Migrant Education Program*. This audit was performed according to the State Comptroller's authority under Article V, Section 1 of the State Constitution and Article II, Section 8 of the State Finance Law.

This audit's results and recommendations are resources for you to use in effectively managing your operations and in meeting the expectations of taxpayers. If you have any questions about this report, please feel free to contact us.

Respectfully submitted,

Office of the State Comptroller
Division of State Government Accountability

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Background

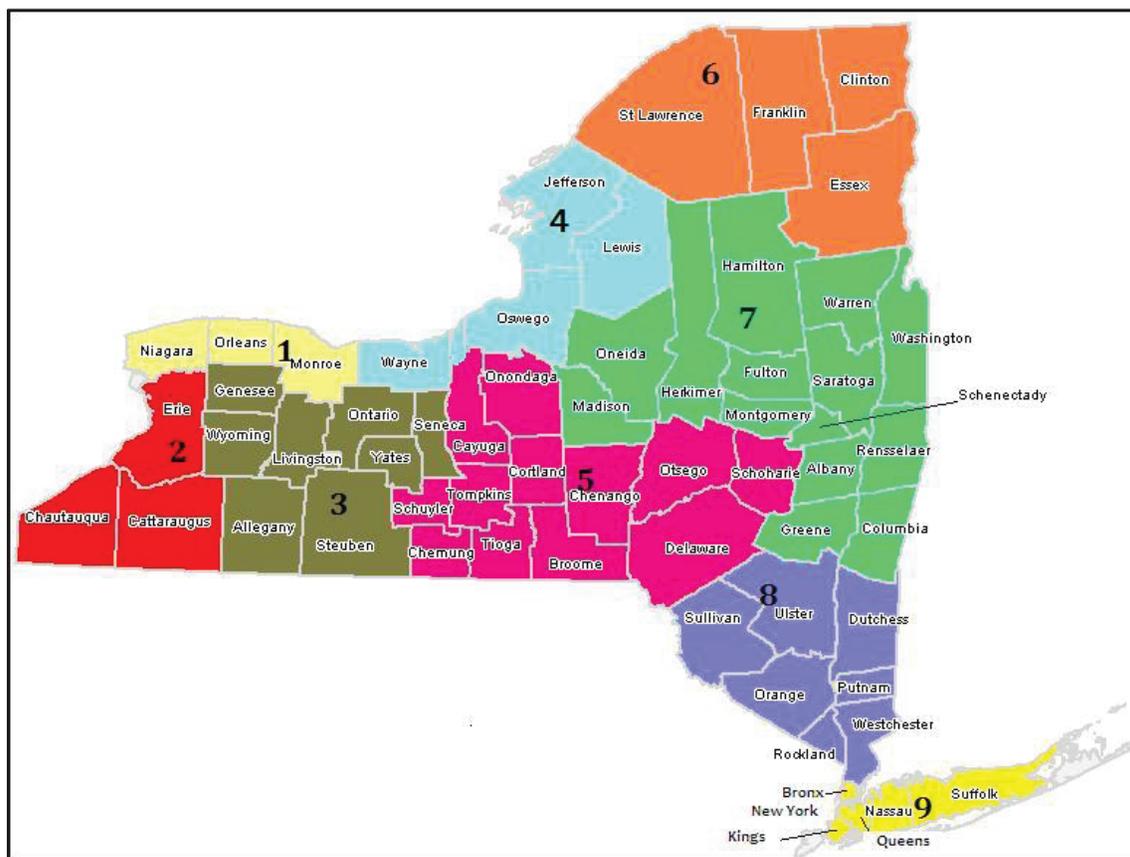
The Migrant Education Program (Program) is a federal grant program authorized by the Federal Elementary and Secondary Education Act (ESEA) under Title 1, Part C, as amended by the No Child Left Behind Act. The Program's goals are to ensure that all eligible students reach challenging academic standards and graduate with a high school diploma (or equivalency), and/or participate in life skills and career education services and, to the extent practicable, successfully complete vocational instruction to college occupational programs. The occupational programs aim to prepare the migrant students for responsible citizenship, further learning, and productive employment. The Department is responsible for administering the program and ensuring the goals are met.

Migrant children are defined as any child between 3 and 21 years old whose parent, guardian, or spouse – or the child him- or herself – is a migratory agricultural worker or fisher and who has moved within the past 36 months between school districts to enable the child or the child's guardian, spouse, or immediate family member to obtain temporary or seasonal employment in an agricultural or fishing activity as a principal means of livelihood. These children face enormous challenges and obstacles in maintaining continuity in their education and completing school, including poverty as well as cultural and language barriers. In addition, they often lack a sense of belonging and a connection to their school and community.

Migrant students may be in New York State for only a portion of the school year, or they may change school districts within the State multiple times a year over their academic life. According to Department information, migrant students often function at a level two or more grades behind their peers, are 20 percent less likely to continue their education past the eighth grade, and have only a 50 percent chance of graduating from high school. As a result, migrant children need special attention and services to compensate for the challenges they face. Migrant students are designated as having "Priority For Services" (PFS) if they are failing, or are at risk of failing, to meet the State's content and performance standards and if their education has been interrupted during the regular school year.

The Department has established Migrant Education Tutorial and Support Services (METS) programs whose staff are charged with delivering high-quality individualized academic and advocacy services to address the special needs of every migrant child in the State. The METS provide these specialized services to migrant students while they attend regular school along with other students. The services include educational and support services for migrant youths in the areas of reading, writing, mathematics, and English as a second language. There are currently nine regional METS programs operated under contract either by individual State University of New York (SUNY) campuses or by regional Boards of Cooperative Education Services (BOCES), as shown in the following chart.

Migrant Education Tutorial and Support (METS) Services by Region



Region	METS	Counties Served
1	Brockport METS (SUNY Brockport)	Monroe, Niagara, Orleans
2	Fredonia METS (SUNY Fredonia)	Cattaraugus, Chautauque, Erie
3	Genesee Valley METS (Genesee Valley Educational Partnership)	Allegany, Genesee, Livingston, Ontario, Seneca, Steuben, Wyoming, Yates
4	Oswego METS (Oswego County BOCES)	Jefferson, Lewis, Oswego, Wayne
5	Cortland METS (SUNY Cortland)	Broome, Cayuga, Chemung, Chenango, Cortland, Delaware, Onondaga, Otsego, Schoharie, Schuyler, Tioga, Tompkins
6	North Country METS (SUNY Potsdam)	Clinton, Essex, Franklin, St. Lawrence
7	Mohawk Regional METS (Herkimer County BOCES)	Albany, Columbia, Fulton, Greene, Hamilton, Herkimer, Madison, Montgomery, Oneida, Rensselaer, Saratoga, Schenectady, Warren, Washington
8	Mid-Hudson METS (SUNY New Paltz)	Dutchess, Orange, Putnam, Rockland, Sullivan, Ulster, Westchester
9	Long Island Metro METS (Eastern Suffolk BOCES)	Nassau, Suffolk, New York City, Boroughs of Brooklyn, Bronx, Queens, Manhattan, Staten Island

The METS provide services to migrant children throughout the State and in various settings, including schools and in the home. They also link migrant families with necessary academic, health, and social services. In addition to the nine METS programs, two SUNY campuses also operate three statewide resource centers devoted to the Program: the Migrant Resource Center and the Identification and Recruitment Center located at SUNY Oneonta and the Professional Development and Inclusion Resource Center at SUNY Brockport. These three centers support the METS in areas such as parent involvement and early childhood services; migrant youth and out-of-school youth services; child identification and recruitment; and technical assistance and professional development.

The Program provides services to migrant students during the regular school year and through summer programs. During 2013 and 2014, the Program averaged about 5,430 students and was funded almost exclusively through federal grants totaling \$9.7 million.

Audit Findings and Recommendations

The Department did not complete required Program documents necessary to establish the Program goals, provide guidance to the METS for program implementation, and measure performance in a timely manner. The delays in turn hampered the availability of relevant and timely performance data to Program and METS managers. Between program years 2012 and 2013, the Program did not achieve three of ten performance outcomes and three of seven broader program goals pertaining to migrant students' graduation rates and proficiency in mathematics and English language arts (ELA). Additionally, some METS staff face challenges obtaining access to student performance data they need to monitor and evaluate their students' performance and adjust services accordingly.

Implementation and Monitoring

Implementation

The ESEA (Title 1, Part C, §1306(a)(1)) requires the Program to develop a Comprehensive Needs Assessment (Assessment) and a Service Delivery Plan (Plan). These key program documents identify the needs of migrant students, describe the scope of services, and provide details on the goals, outcomes, activities, and systems for accountability that are aimed at increasing the achievement of all migrant children. Both the Assessment and Plan are necessary to establish the goals of the Program as well as to measure its performance and effectiveness. However, the creation of both documents was significantly delayed.

The Department began creating the Assessment in 2002, but didn't finish it until 2009. Also, the Plan wasn't finalized until March 2011. Additionally, both of these documents should be updated as needed when Program changes occur. An updated Plan was due to the U.S. Department of Education by September 30, 2014, but was not yet complete as of February 2015. The Program Manager stated the Plan is underway, with completion expected by September 2015. We note that since 2002 the Program has had four different Managers, which may have had some impact on the preparation and late completion of these documents.

Monitoring

To ensure the Program complies with the ESEA and regulatory requirements and achieves its goals, Program managers need to routinely monitor compliance and program performance against the established criteria (i.e., the Assessment and Plan). Doing so provides managers with opportunities to measure activities and their associated outcomes, and enables them to identify good performance along with non-compliance and lagging performance and take corrective action in a timely fashion. Federal regulations (34 CFR §200.84 and §200.85) require the Department to determine the effectiveness of its program through a written evaluation that measures the implementation and results achieved by the Program against the State's performance targets, particularly for those students who have PFS, and to use the evaluation results at the State and local levels for Program improvements.

Department monitoring activities include on-site visits to the METS to ensure compliance with Program requirements. During the visits, Department staff interview METS staff representing all aspects of the program such as directors, data specialists, tutors, and liaisons for parent advisory, adolescent outreach, and out-of-school youth. Staff also review program records such as training agendas, students' certificates of eligibility, student intake forms, and financial records. The Department completed visits to six METS between 2012 and 2013, but no visits were conducted in 2014. The Department attributed this to the focus on development of its Assessment and Plan and the transition to a new Program manager in March 2014. While visits provided beneficial information on how the METS implemented their individual programs, they did not evaluate the METS performance toward the target goals and performance measures in the Plan.

The Department also receives a biennial evaluation report from a consultant. The report provides performance data and indicates whether program goals established in the Plan were met for each year of the two-year period. The report lags the program period covered by approximately two months. However, neither the Department nor the METS receive interim performance information on their progress toward the goals and outcomes periodically during the two-year period. Therefore, they are less likely to identify lagging performance, and the need to identify and consider alternative approaches to improve performance, in a timely manner. In fact, in September 2013, a U.S. Department of Education review of the Program found that there was little evidence that the Department or the local METS used program data for program improvement.

In addition to assessing their overall performance, the METS also need to be able to monitor and assess the progress of individual students. However, during our interviews with METS staff, we learned some of them encounter challenges obtaining the student performance data they need. The METS operating out of BOCES generally have sufficient access to student data. BOCES provide services in all but nine of the State's school districts and, therefore, already have strong alliances with local school districts, which facilitates such access. In contrast, four of the five SUNY-based METS stated they had difficulties obtaining data from school districts about their migrant students. As a result, these METS are disadvantaged in their ability to properly track their students' performance and to promptly adjust the services they provide as needed.

The Program manager stated he is aware of the issue, and is working toward a solution to provide the METS greater access to school district data for their migrant students. He explained many of the delays are those that the school districts face as well (e.g., privacy issues), and the only way to significantly speed up the process may be to retrieve assessment results directly from the Office of Information Reporting Services or the local Regional Information Centers. As an immediate step, the Department agreed to include a statement providing METS personnel with access to migrant students' records via the Certificate of Eligibility letter which informs school districts that they have migrant students.

As detailed subsequently in this report, migrant students have struggled to achieve certain important Program goals and intended outcomes. Consequently, we believe that more effective Department monitoring of the Program will be essential to help ensure acceptable academic performance for migrant students in the future.

Attainment of Program Goals

The Program's current Plan, which was developed in 2011, includes goals for all children in four areas as mandated by the No Child Left Behind Act: School Readiness, ELA, Mathematics, and Graduation. The Plan also includes targeted goals in three additional program areas: Parent Involvement, Out-of-School Youth, and Student Records. A complete list of the goals is presented in Exhibit A at the end of this report. The Plan further includes certain measurable program outcomes that represent achievement benchmarks for the seven program areas, which are presented in Exhibit B.

According to the performance data developed by the Department's consultant, the Program has not met all of the goals or measurable outcomes established in the Plan. In particular, the Program failed to meet three of the seven overall goals and three of the ten measurable performance outcomes, as shown in the attached Exhibits. Generally, the unmet goals and outcomes relate to the broader measures of student achievement in mathematics and ELA (as mandated by the No Child Left Behind Act) and to graduation or credit accrual rates as compared to other students statewide.

For example, one of the Program's unmet goals is to have all migrant students who have been enrolled in a school in New York since the ninth grade earn a high school diploma at the same rate as children in the "economically disadvantaged" subgroup of students in the State. For 2013, the graduation rate was 40 percent for this cohort of migrant students but 69 percent for the similar group of economically disadvantaged students. In 2014, the rates were 51 and 71 percent, respectively, indicating the performance gap had closed by about one-third but nonetheless remains significant.

Between the 2012-13 and 2013-14 school years, the State significantly changed the way student performance is measured statewide. Therefore, changes in student achievement toward the math and ELA goals could not be specifically measured. However, the Department's consultant did report that the Program had not met its goal in reducing the achievement gap in either math or ELA in program years 2011 and 2012, just prior to our audit period.

The Department measured achievement for both PFS and non-PFS migrant students as compared to the economically disadvantaged subgroup of students. The achievement gaps between non-PFS migrant students and economically disadvantaged children widened 13 percent in ELA and 1 percent in math. The gap between the PFS migrant and the economically disadvantaged students did shrink by 6 percent in math and by 1 percent in ELA, but still remained relatively significant at 20 percent and 22 percent, respectively.

The four goals and seven performance outcomes that were met pertained to Program services. For example, services for early child development are closely aligned with the Program's NYS Migrant Early Childhood Assessment, and have shown achievement gains. Unlike the statewide goals and outcomes, these goals are aligned with Program services. As a result, there are no complications obtaining data from the school districts, and METS staff can therefore monitor performance and adjust services as needed.

Recommendations

1. Take steps to expedite the Plan update, and complete future programmatic updates in a timely fashion.
2. Develop methods to periodically provide evaluation results both at the METS level and Program-wide to monitor performance against established goals.
3. Establish a method to facilitate the timely exchange of information between METS and school districts.

Audit Scope and Methodology

The objective of our audit was to determine whether the State Education Department (Department) properly oversees the Migrant Education Program (Program) to ensure that it complies with all requirements and achieves its program goals. Our audit scope included the period September 1, 2012 through February 12, 2015.

To accomplish our audit objective, we interviewed Department officials, and conducted site visits to and interviewed officials from all nine METS as well as the Identification and Recruitment statewide office. We obtained and reviewed a 2012 Evaluation Report issued in October 2012 and prepared by the Program's consultant, which provided performance data for program years 2011 and 2012. We also obtained and reviewed Program performance data for program years 2013 and 2014 from the consultant. In addition, we reviewed Program data provided by the Director of the Identification and Recruitment Center for program years 2013 and 2014, which included student enrollment, needs assessments, approved and denied applications, and graduation rates. We reviewed Title 1, Part C of the ESEA, which was amended in 2002 as the No Child Left Behind Act; the Program's Service Delivery Plan; and the Comprehensive Needs Assessment. We examined the Department's internal controls as they related to the Program, and assessed their adequacy as they related to our audit objective.

We conducted our performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

In addition to being the State Auditor, the Comptroller performs certain other constitutionally and statutorily mandated duties as the chief fiscal officer of New York State. These include operating the State's accounting system; preparing the State's financial statements; and approving State contracts, refunds, and other payments. In addition, the Comptroller appoints members to certain boards, commissions, and public authorities, some of whom have minority voting rights. These duties may be considered management functions for purposes of evaluating organizational independence under generally accepted government auditing standards. In our opinion, these functions do not affect our ability to conduct independent audits of program performance.

Authority

This audit was performed according to the State Comptroller's authority under Article V, Section 1 of the State Constitution and Article II, Section 8 of the State Finance Law.

Reporting Requirements

A draft copy of this report was provided to State Education Department officials for their review and comment. Their comments were considered in preparing this final report and are attached in their entirety to the end of the report. The Department agreed with our recommendations and indicated steps it will take to implement them.

Within 90 days after final release of this report, as required by Section 170 of the Executive Law, the Commissioner of Education shall report to the Governor, the State Comptroller, and the leaders of the Legislature and fiscal committees, advising what steps were taken to implement the recommendations contained herein, and where recommendations were not implemented, the reasons why.

Contributors to This Report

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Vision

A team of accountability experts respected for providing information that decision makers value.

Mission

To improve government operations by conducting independent audits, reviews and evaluations of New York State and New York City taxpayer financed programs.

Exhibit A

Migrant Education Program (MEP) Performance Goals Included in 2011 Service Delivery Plan

Goal Area	NCLB Mandated	NYS MEP Target Goal	Target Goal Met?
School Readiness	All students will enter kindergarten ready to learn.	By 2014, all migrant children who have been in New York State for at least two years will demonstrate the skills needed to successfully complete kindergarten.	Yes
English Language Arts (ELA)	By 2014, all students will demonstrate proficiency in ELA on state assessments.	By 2014, all migrant students will demonstrate proficiency in ELA on the state assessments at the same rate as the “economically disadvantaged” subgroup of New York State students.	No
Mathematics	By 2014, all students will demonstrate proficiency in mathematics on state assessments.	By 2014, all migrant students will demonstrate proficiency in math on the state assessments at the same rate as the “economically disadvantaged” subgroup of New York State students.	No
Graduation	By 2014, all students will earn a high school diploma.	See Note below.	N/A
Graduation, Credit Accrual, and Grade Promotion	Not specified	By 2014, all migrant students who have been enrolled in a NYS school since 9 th grade will earn a high school diploma at the same rate as the “economically disadvantaged” subgroup of New York State students in their cohort.	No
Out-of-School Youth	Not specified	Migrant out-of-school youth will increase their English language proficiency and/or make progress toward achieving their educational or career goals.	Yes
Student Records Exchange/Technology	Not specified	By 2014, duplicate MIS-2000 student records will be reduced by 50% and all data specialists will have been trained in the means to accomplish this goal.	Yes
Parent Involvement	Not specified	Migrant parents will develop the skills to enable them to become independent in supporting their children’s education.	Yes

Note. N/A, could not be measured.

Exhibit B

Migrant Education Program (MEP) Measurable Program Outcomes

Goal Area	Measurable Program Outcomes (MPOs)	Was the MPO Achieved?		
		2011	2012	2013
Mathematics	1.a. 80% of students in the MEP summer instructional program will show a significantly meaningful pre-post increase on the MEP approved summer math assessment.	Yes	Yes	Yes
	1.b. Reduce the NYS Mathematics Assessment achievement gap between migrant students who have received at least 8 months of services in NYS and the “Economically Disadvantaged” subgroup of NYS students by 5% each year.	No	No	N/A
Out-of-School Youth (OSY)	2.a. 80% of all surveyed migrant OSY will receive a minimum of three educational contact visits, pro-rated per 12-month cycle, following identification.	Yes	Yes	Yes
	2.b. 75% of OSY with at least 20 hours of English acquisition instruction will demonstrate a statistically meaningful raw score pre-post increase on the Oral Language/Basic English Screening Tool or an appropriate alternative assessment.	Yes	Yes	Yes
English Language Arts	3. Reduce the NYS English Language Arts Assessment achievement gap between migrant students who have received at least 8 months of services in NYS and the “Economically Disadvantaged” subgroup of NYS students by 5% each year.	No	No	N/A
Parent Involvement	4.a. Each METS will have at least three parents who serve on the local Parent Advisory Council (PAC) and at least one of those parents will serve on the state PAC providing meaningful consultation in the planning, operation, and evaluation of the local and state programs demonstrated by attendance and notes taken at the meeting.	Yes	Yes	Yes
	4.b. Migrant parents will increase the number and range of strategies used to help their children learn, including increased engagement with their children’s schools.	Yes	Yes	Yes
Credit Accrual/ Graduation/ Grade Promotion	5. The percentage of migrant students who will accrue eleven credits by the end of the tenth grade will increase by two percentage points per year.	No data	No data	No
School Readiness	6. Increase school readiness of migrant preschool children through referral to MEP approved preschool programs and as indicated by a statistically meaningful increase on the NYS Migrant Early Childhood Assessment for Children ages P3-P5.	Yes	Yes	Yes
Student Records Exchange/ Technology	7. Duplicate migrant student records in MIS-2000 will be held to less than 1% of all records at the time of CSPR submission.	Yes	Yes	Yes

Note. N/A, could not be measured.

Agency Comments



THE STATE EDUCATION DEPARTMENT / THE UNIVERSITY OF THE STATE OF NEW YORK / ALBANY, NY 12234

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March 19, 2015

Mr. John F. Buyce
Audit Director
Office of the State Comptroller
Division of State Government Accountability
110 State Street – 11th Floor
Albany, NY 12236

Dear Mr. Buyce:

The following is the New York State Education Department's (SED) response to the draft audit report (2014-S-48) of the State Education Department: *Selected Aspects of the Migrant Education Program*.

Recommendation 1: Take steps to expedite the Plan update, and complete future programmatic updates in a timely fashion.

We agree with this recommendation. SED will review and make adjustments to the current Comprehensive Needs Assessment (CNA) process and protocols as noted in the report; review the Service Delivery Plan (SDP) annually; revise it, as necessary; and update it in a timely fashion to reflect changes in the State's strategies and programs as per requirements of Title I, Part C § 1306(a)(2).

Recommendation 2: Develop methods to periodically provide evaluation results at both the METS level and Program-wide to monitor performance against established goals.

We agree with this recommendation. SED will develop methods, including processes and protocols, to conduct annual goals-based, process-based, and/or outcomes-based evaluations of the nine (9) regional Migrant Education Tutorial and Support Services Programs (METS), the three (3) Migrant Statewide Support Services Programs, and Program-wide to assess student growth against established program goals. These evaluations will include one or more of the following elements:

- Questionnaires, surveys, checklists
- Interviews
- Documentation Review
- Observations
- Focus Groups
- Case Studies

Recommendation 3: Establish a method to facilitate the timely exchange of information between METS and school districts.

We agree with this recommendation. SED will build instructional data systems (MIS2000 and MSIX) that measure student success and inform educators of migrant students how to improve practice. SED will also establish method(s) to ensure the timely exchange and "...linkage of migrant student record systems for the purpose of electronically exchanging...health and educational information regarding all migratory students" (Title I, Part C § 1304(b)(1)) among the nine (9) regional Migrant Education Tutorial and Support Services Programs (METS), the three (3) Migrant Statewide Support Services Programs, the State Education Department (SED), and school districts to drive programming and services.

If you have any questions regarding this response, please contact Maxine Meadows-Shuford, Supervisor, at 518-473-0295.

Sincerely,



Sharon Cates-Williams

cc: Ira Schwartz
Maxine Meadows-Shuford
Kin T. Chee