

## DOCUMENT RESUME

ED 321 927

RC 017 628

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TITLE A Review and Description of Services for Migrant Children.  
INSTITUTION Advanced Technology, Inc., Washington, DC.; Education Analysis Center for State and Local Grants (ED), Washington, DC.  
SPONS AGENCY Department of Education, Washington, DC. Office of Planning, Budget, and Evaluation.  
PUB DATE Sep 85  
CONTRACT 300-82-0380  
NOTE 177p.  
PUB TYPE Reports - Descriptive (141) -- Reports - Evaluative/Feasibility (142)

EDRS PRICE MF01/PC08 Plus Postage.  
DESCRIPTORS Coordination; Data Collection; Eligibility; \*Federal Programs; \*Financial Support; Legal Aid; Migrant Education; \*Migrant Programs; \*Migrant Welfare Services; Needs Assessment; Outreach Programs; \*Program Evaluation; Research Problems; Seasonal Employment; State Federal Aid  
IDENTIFIERS Client Identification; Migrant Tracking; Program Duplication

## ABSTRACT

American migrant and seasonal agricultural workers are a population needing categorical assistance due to low income, difficult working and living conditions, and a mobile lifestyle. The purpose of this study was to identify, describe, and analyze federally funded migrant services. This study, based on interviews with program officials and available literature, offers information on the following subjects, relating to federal migrant programs: (1) definitions and eligibility; (2) geographical locations and seasonal variations; (3) migrant services provided, funding levels, and numbers served; (4) identification, recruiting, and tracking; (5) coordination and duplication of services; and (6) data, databases, and evaluation methods. The study identified 16 migrant or migrant-related programs, each designed to provide a specific set of services. These included educational, health, nutritional, legal, and social services. Most federal programs awarded grants to state and local service agencies. The Department of Education funded three educational and one vocational rehabilitation program. Problems occur because official definitions of migrants vary. Also, data concerning size, location, and seasonal mobility of the population are subject to inconsistencies. A great deal of variation was found in the collected data. The most common method of outreach was staff visits to labor and housing camps. Federal officials recognize the need to coordinate their programs. The analysis indicates that duplication of federal migrant services is limited. Most of the programs are evaluated on the basis of numbers served and cost-effectiveness. Only education programs used improvement gains as effectiveness measures. (TES)

ED321927

# A REVIEW AND DESCRIPTION OF SERVICES FOR MIGRANT CHILDREN

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Prepared For  
**STATE AND LOCAL GRANTS DIVISION  
OFFICE OF PLANNING, BUDGET AND EVALUATION  
U.S. DEPARTMENT OF EDUCATION**

**Contract No. 300-82-0380**

**SEPTEMBER 1985**

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FOR STATE AND LOCAL GRANTS

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This report was prepared pursuant to Contract Number 300-82-0380, U.S. Department of Education. The cost of the project was \$27,611. The opinions and conclusions expressed in this report are those of the authors and do not necessarily represent the position or policies of the U.S. Department of Education.

Technical Monitors for this project were Mr. James J. English and Dr. Judith Anderson, U.S. Department of Education.

## ACKNOWLEDGMENTS

We wish to thank those individuals who gave freely of their time and thoughts during telephone and personal interviews. We are especially thankful to those officials involved in the 16 programs presented in this report. They not only were informative during interviews, but were also kind enough to share program documentation with us. Without their cooperation and assistance this study would not have been possible.

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## ACRONYMS

The following is a list of abbreviations used in this report:

- CAMP - College Assistance Migrant Program
- CETA - Comprehensive Employment and Training Act
- CREST - Comprehensive Recruiter Effectiveness Skills Training
- ED - U.S. Department of Education
- EPA - Environmental Protection Agency
- FLCRA - Farm Labor Contractor Registration Act
- GED - General Education Development Certificate
- HEP - High School Equivalency Program
- HHS - U.S. Department of Health and Human Services
- IMSSP - Interstate Migrant Secondary Services Program
- JTPA - Job Training Partnership Act
- LEA - Local Education Agency
- MEP - Migrant Education Program
- MERLIN - Migrant Education Resource List and Information Network
- MSPA - Migrant and Seasonal Agricultural Worker Protection Act
- MSRTS - Migrant Student Record Transfer System
- OSHA - Occupational Safety and Health Administration
- SEA - State Education Agency
- USDA - United States Department of Agriculture
- VOC - Verification of Certification
- WIC - Women, Infants and Children

## EXECUTIVE SUMMARY

American migrant and seasonal agricultural workers have been identified as a population in need of categorical assistance due to low family income, difficult working and living conditions, and a highly mobile lifestyle. The combination of these factors and the resulting effects prompted the establishment of federal programs that target services for migrants and their families. Numerous federal programs now exist that provide a wide range of assistance focusing on health care, education, nutrition, legal aid, and social services. These programs employ various methods for identifying and recruiting program participants and providing services on a continuous basis. Additionally, variations exist among the programs concerning definitions and eligibility criteria for migrants, as well as efforts to coordinate services with other programs in an attempt to avoid duplication of services. These issues are of concern to the U.S. Department of Education (ED) and provided the impetus for this research.

The purpose of this study was to identify, describe and analyze various aspects of services provided to migrants through federally funded programs. This study employed a methodology of interviewing federal program officials and reviewing available documents and literature. The following topics provided the structure to the research:

- Services provided, funding levels, number of grantees and numbers served
- Definitions and eligibility criteria
- Geographical locations and seasonal variations

- Identification, recruiting and tracking
- Coordination and duplication of services
- Data collected, data bases maintained and evaluation methods

The study identified 16 programs that serve migrants, either exclusively or as a subset of a larger target population. Each federal program is designed to provide a specific set of services to a sector of the population. These include educational, health, nutritional, legal, and social services. The majority of these programs award grants to State and local agencies which, in turn, serve the migrant population.

The Department of Education funds three educational and one vocational rehabilitation grant program. The Department of Health and Human Services supports one health and one social services grant program. The Department of Labor and the Legal Services Corporation directly provide services to migrants through local offices. All of these programs provide services exclusively for migrants. Funding for these programs totaled \$416 million. The Department of Education accounts for 66 percent of this amount; the Migrant Education Program alone accounts for 63 percent.

The other group of programs provides services to migrants as part of a broader population. These range from Food Stamp and Food Distribution Programs to Occupational Safety and Health Administration (OSHA) and Environmental Protection Agency (EPA) safety programs. Funding for programs not specifically targeted at migrants totaled over \$11 billion. It was not possible to estimate the proportion of funds that were provided to migrants, because these programs do not identify migrants and the services they receive separately from other service recipients.

The definition of migrants varies across programs on two dimensions: type of labor (agricultural or fisher) and mobility. Program eligibility criteria similarly vary by program and include the definitional differences cited above. There are age and income requirements for several programs, although income requirements are limited to programs not specifically targeted at migrants.

Data concerning the size, location and seasonal mobility of the migrant population are subject to inconsistencies. Few sources agree on numbers or migration patterns, except on the grossest levels. Most did agree that the largest numbers of migrants originate in Texas, California, and Florida (home base States), and annually follow eastern, midwestern and western streams. Sources of data on seasonal concentrations in States within these streams were not readily available.

The lack of a uniform definition of migrants hampers consistency of data. Estimates range from 700,000 to 800,000 migrants and about 2 million to 6 million for migrants and seasonal agricultural workers combined (some of whom may be inactive migrants). The problem is not merely definitional, however. The Census, often the most reliable source of such data, does not enumerate migrants because their mobility would result in duplicative counts. In addition to the difficulties inherent in enumerating a mobile population, structural changes in the agricultural economy and weather variations alter migration patterns and may in fact cause migrants to "settle out", that is, no longer migrate to obtain agricultural work.

Information collected during this study indicates that identification and recruitment are an integrated function in those programs that exclusively serve migrants. The most commonly reported method of outreach involves visits by trained program staff to labor and housing camps to locate eligible migrants and inform them about available services. Some programs surveyed do not use outreach techniques but rely on referrals or informal identification methods. (The Food Stamp Program was the only program that did not recruit.)

A great deal of variation was found in the data collected and the data maintained by these programs. The Migrant Student Record Transfer System (MSRTS) is the national standard for migrant data bases. It is a computerized national data base that contains individual records for each person served by the ED programs. Other programs maintain some form of computerized or paper-based system at the federal level, although none maintain individual records at this level. Such records are typically located at the local level. With the exception of MSRTS, all computerized national data bases contain only program or general participation information.

Although tracking of migrants is fundamental in order to provide services on a continuous basis, the program officials indicated that attempts to track have been unsuccessful. Because tracking of migrants has proven an unsatisfactory approach, several programs rely on referring the migrant to another project in the area to which they move. This type of referral system may assist the migrant in receiving categorical services on a continuous basis despite their mobility. One program that

does attempt to track migrants is the Migrant Education Program (MEP). Through the Migrant Student Record Transfer System (MSRTS), MEP program staff may access or input educational, health or other such historical data on migrant children. One of the major shortcomings of this system is that the migrant child may move to an area where MEP services are unavailable and they consequently are unable to receive services. Additionally, school personnel do not always keep the data up-to-date.

Because services available to migrants are provided by numerous agencies, the need for coordination among the programs - each of which provides different services - is well recognized by federal program officials. Officials interviewed suggested, however, that coordination efforts to date at the federal level have been largely unsuccessful. Despite an apparent lack of success in coordinating programs targeted at migrants on the federal level, officials interviewed were unaware of duplication of efforts. Our analysis further indicates that the opportunities for duplication of services to occur across programs are limited by the type of services provided and the eligible populations. Respondents suggested that program requirements, a system of referrals and scarce program funds ensure that no duplication occurs. Because the methodology was limited to federal-level research, the study provides no data to confirm these assertions.

Most programs surveyed require some form of annual evaluation. Most are evaluated on the basis of numbers served and cost effectiveness of services. Only five (four of the ED programs and Migrant Head Start) used improvement gains as effectiveness measures.

## SECTION 1.0 INTRODUCTION

According to the 1980 report of the Presidential Commission on World Hunger the American migrant population faces startlingly depressed circumstances, despite their importance to the agricultural economy. They work for low wages; suffer periodic, often extended unemployment; have a shortened life expectancy; are at risk of malnutrition; and their children have the lowest educational attainment of any group in the country. Many of these circumstances are created by the nature of their work and the high mobility of the population.

A variety of categorical federal programs have been created to provide migrants with educational, health, nutritional, legal and social services. In addition to these programs targeted at migrants, numerous other programs provide services to migrants as part of a larger population (e.g., Food Stamps for the low income).

This study identified a total of 16 programs that serve migrants; 9 of which provide services exclusively to migrants. The Department of Education (ED) funds three educational and one vocational rehabilitation grant program. The Department of Health and Human Services (HHS) supports one health and one social services grant program. The Department of Labor and the Legal Services Corporation directly provide services to migrants through local offices. The Department of Agriculture supports the Women, Infants and Children (WIC) program for nutritional assistance. All of these programs provide services exclusively for migrants. Funding for programs totaled \$416 million in Fiscal Year 1984. ED provided two thirds of this funding.



A second group of programs provides services to migrants as part of a broader target population. These range from Food Stamp and Food Distribution Programs to Occupational Safety and Health Administration (OSHA) and Environmental Protection Agency (EPA) safety programs. Funding for programs not specifically targeted at migrants totaled over \$11 billion, although it was not possible to estimate the proportion of funds that were provided to migrants.

Although categorical programs have been instituted to provide services to the migrant and seasonal farmworker population, these programs have experienced difficulties not only in providing their services, but also in providing them on a continuous basis. These difficulties arise from:

- Differing definitions of the same population under various federal programs which may allow participation in one federal program and ineligibility under another.
- The mobility of this population which makes recordkeeping problematic and can result in rediagnosis and redetermination of eligibility.
- Mobility which often results in disrupted education for children and also provides problems in obtaining adequate and continuous health care.
- The unavailability of special services in an area migrants move to in search of employment which results in discontinuity of services.

## 1.1 Study Objectives and Design

Two objectives guided the design and conduct of this study. The objectives were:

- To identify federal programs targeted to migrant persons; and
- To review and describe those programs for definition, identification and recruitment of migrant persons.

In order to accomplish these objectives, interviews were conducted at the federal level and relevant federal program documentation was collected and analyzed. A snowballing technique was used in the interviews, i.e., interviewee identification was accomplished in a structured manner, starting with a review of the Catalog of Federal Domestic Assistance Programs, referrals by U.S. Department of Education staff members and contacts with relevant interest groups and associations. Each of these initial contact persons was asked to identify federal programs which serve migrants and these leads were then pursued. This interviewing technique resulted in identification of 16 programs, 9 of which target their services specifically for migrants and 7 of which include migrants as a subset of a larger eligible population. (A list of persons contacted and their affiliations is provided as Appendix A.)

In addition, federal program officials interviewed for each of the 16 identified programs were asked to provide pertinent documentation. Upon receipt of this documentation, the study team synthesized relevant information which was then incorporated into this report. The comparative study analyzed:

- Services provided, funding levels, number of grantees and numbers served
- Definitions and eligibility criteria
- Geographical locations and seasonal variations
- Identification, recruiting and tracking
- Coordination and duplication of services
- Data collected, data bases maintained and evaluation methods

These topics are presented in the following chapters.

## SECTION 2.0 DESCRIPTION OF PROGRAMS SERVING MIGRANTS

Based on interviews and document reviews conducted as part of this project, the study team identified various programs which provide services to the migrant and seasonal agricultural workers in this country. Interviews and document reviews indicate that migrants and seasonal agricultural workers are offered a wide range of services through a variety of programs. This section examines these 16 programs by the focus of their target population and the type of services provided.

The programs identified in this study may be placed in two separate categories:

- 1) Those programs which are specifically designed for delivery of services to the migrant population
- 2) Those programs under which migrants may be eligible to receive services based on certain eligibility criteria (e.g., low income) and thus are served as a subgroup of a larger target population

There are several programs which provide services to the migrant population specifically, for example, Migrant Education Programs, Migrant Health Centers Program, Migrant and Seasonal Farmworker Program, Migrant Legal Action Program, and Migrant Head Start Programs. There are also several programs which serve migrants as a subset of a larger target population such as Community Health Centers Program, Pesticides Farm Safety Program, Food Stamp Program, Food Distribution Program, Employment Services, Occupational Safety and Health Administration. These programs

are categorized according to the focus of its basic program objective focusing on:

- Education
- Health
- Nutrition
- Employment
- Legal
- Social services

Table 1 presents the 16 programs by basic program objective. Although each may be categorized into one of these six basic areas of program objectives, several programs provide a combination of services. For example, Migrant Education Programs provide educational services targeted for migrants, but may also provide other supportive services such as health and nutrition. Another example is the Employment and Training Administration which, although primarily interested in placing a migrant in a non-migratory or seasonal occupation, also provides health and legal aid or transportation assistance for migrant workers when necessary.

Table 1  
Program Objectives

Programs Primary Service Objective	Programs Specifically for Migrants	Programs Which Serve Migrants as a Subset of the Eligible Population
EDUCATIONAL SERVICES	<ul style="list-style-type: none"> <li>● High School Equivalency Program (HEP) Department of Education</li> <li>● College Assistance Migrant Program (CAMP) Department of Education</li> <li>● State Migrant Education Program (MEP) Department of Education</li> </ul>	
NUTRITIONAL SERVICES	<ul style="list-style-type: none"> <li>● Women, Infants, Children (WIC) Program Department of Agriculture</li> </ul>	<ul style="list-style-type: none"> <li>● Food Stamp Program Department of Agriculture</li> <li>● Food Distribution Program Department of Agriculture</li> </ul>
EMPLOYMENT SERVICES	<ul style="list-style-type: none"> <li>● Migrant and Seasonal Farmworker Program Department of Labor</li> <li>● Handicapped Migratory Agriculture and Seasonal Farmworkers Vocational Rehabilitation Service Program Department of Education</li> </ul>	<ul style="list-style-type: none"> <li>● Employment Service Department of Labor</li> <li>● Employment Standards Administration Department of Labor</li> </ul>

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Table 1 (Continued)  
Program Objectives

Programs Primary Service Objective	Programs Specifically for Migrants	Programs Which Serve Migrants as a Subset of the Eligible Population
HEALTH SERVICES	<ul style="list-style-type: none"> <li>● Migrant Health Centers Program Department of HHS</li> </ul>	<ul style="list-style-type: none"> <li>● Pesticide Farm Safety Program Environmental Protection Agency</li> <li>● Community Health Centers Program Department of HHS</li> <li>● OSHA Department of Labor</li> </ul>
LEGAL SERVICES	<ul style="list-style-type: none"> <li>● Migrant Legal Action Program Legal Services Corporation</li> </ul>	
SOCIAL SERVICES	<ul style="list-style-type: none"> <li>● Migrant Head Start Program Department of HHS</li> </ul>	

2-4

## 2.1 Programs Specifically for Migrants

There are ten programs specifically designed for the migrant population. The following are descriptions of these programs.

### Migrant Education Program

A national education program for migrant children was established in November 1966 with the enactment of P.L. 89-750 which amended Title I of the Elementary and Secondary Education Act of 1965 (now Chapter 1 of the Education Consolidation and Improvement Act of 1981). P.L. 89-750 provided for federal funds to be awarded to State agencies as grants to "establish or improve programs to meet the special needs of children of migratory agricultural workers" (GAO/HRD-83-40:1).

In 1967, P.L. 90-247 of the Elementary and Secondary Education Act Amendments extended the Migrant Education Program coverage to include (without additional funding) formerly migrant children for up to five years if they resided in any area served by a migrant program or project and had parental consent. This amendment "provided for the continuity of effort needed to dislodge such children from the migrant stream and integrate them successfully into the local educational system" (GAO/HRD-83-40:18). In 1974 and 1978 the program was amended again, extending eligibility for the program to migrant fishers, providing funds for formerly migrant children, and calling attention to the need for summer education programs.



The currently reported priority for providing educational services for migrant children is:

- 1) Currently migrant school-age children
- 2) Currently migrant preschool children
- 3) Formerly migrant school-age children
- 4) Formerly migrant preschoolers

The Department of Education has found that it is important to prioritize in order that educational assistance is provided to those children most in need of services. For example, if a State can show that older brothers or sisters are not attending school to care for younger siblings, preschool age children will receive services before formerly migrant children.

The Migrant Education Program also funds the Migrant Student Record Transfer System (MSRTS) which is located in Little Rock, Arkansas. The MSRTS is "a national automated telecommunications system which provides academic and other information on migrant children to participating schools on request" (GAO/MWD-76-21:1). The information provided through this system not only includes the educational background of migrant children, but health records as well. The MSRTS may be utilized not only to retrieve education and health data that have previously been entered, but also to enter pertinent data for a newly enrolled student. The MSRTS also provides information for determining allocations to the States for migrant program funds. Funding is based on the number of full-time equivalent students, ages 5 to 17, in the MSRTS.

The funding for migrant education programs is "taken 100 percent 'off the top' of the total Chapter 1 funding authorization" (GAO/HRD-83-40:5). Funds are awarded as grants to each State education agency (SEA) which in turn administers and operates the migrant program. The SEAs provide basic and special grants to local school districts and other public and private organizations that operate migrant projects.

Services provided under the Migrant Education Program are primarily compensatory instruction in math and reading. However, "regulations also allow States and operating agencies to design and operate projects that provide health, nutritional, social and other supportive services necessary to enable eligible migratory children to benefit from instructional services" (GAO/HRD-83-40:2). These services must first be requested by the State or operating agency from other State and federal programs. If it is determined that such services are not available or are inadequate to meet the migrant's needs, then the State or locally operated migrant education project may provide these services.

The Migrant Education-Interstate/Intrastate Coordination Program is administered by the U.S. Department of Education. This program is designed to improve the interstate and intrastate coordination of Migrant Education Program activities. The following are examples of projects created by States in an effort to produce modules, resources or services of value and utility for all States:

- Indiana developed the Comprehensive Recruiter Effectiveness Skills Training (CREST) program which is a competency-based, multi-media training package for identification and recruitment personnel. Additionally, Indiana (in a

cooperative effort with Texas) created the Parent Training Network which involves a training program for migrant parents and provides the opportunity for them to learn organizational skills and assume greater responsibility for planning and conducting meetings and various other activities.

- New York created the Interstate Migrant Secondary Services Program (IMSSP) in an effort to lower the drop-out rate among migrant secondary school students.
- Pennsylvania developed the Migrant Education Resource List and Information Network (MERLIN) which is a data base containing a list of up-to-date resources (e.g., people, programs, documents and other materials) that any State may access for information. MERLIN also provides a search service of various other data bases for those migrant educators who do not have other access. This data base was designed to improve interstate coordination of migrant education activities through a networking resource system available to all States and Puerto Rico.

These are three examples of projects developed under the Migrant Education-Interstate/Intrastate Coordination Program. Most projects proposed for funding fall under one or more of 10 categories of suggested activities. These activities are:

- Parental involvement
- Resource centers
- Identification and recruitment
- Secondary school services
- Information and dissemination
- Staff development
- Interagency coordination
- Records transfer system
- Project evaluation
- Summer school project services

For FY 1985 approximately \$2.1 million was awarded to 14 grantees through discretionary grants funded by the Migrant Education Program.

The Migrant Education-Interstate/Intrastate Coordination Program coordinates the activities provided by the Migrant Education Program (HEP), the High School Equivalency Program (HEP), and the College Assistance Migrant Program (CAMP), therefore analysis of the activities coordinated through this program will be provided through MEP, CAMP, and HEP.

For FY 1985 the total appropriation for the Migrant Education Program was \$264,524,000 (which included funds for the MSRTS and the Interstate/Intrastate coordination project) and approximately 3,300 projects received funding. An estimated 800,000 students were enrolled on the MSRTS and were eligible for services, and approximately 593,000 were served under the Migrant Education Program (Fiscal Year 1983 Annual Evaluation Report: 102-3).

#### The High School Equivalency Program

The High School Equivalency Program (HEP), currently administered under the U.S. Department of Education, was previously administered under the U.S. Department of Labor, Title III, Section 303(c)(2) of the Comprehensive Employment and Training Act (CETA). The administration of this program was transferred in 1980 to the U.S. Department of Education.

HEP is designed to assist in the attainment of higher education for migrants above the compulsory school age of 16 or older. HEP assists students who perform or whose families perform migrant or other seasonal type farmwork to obtain the equivalent of a high school diploma and to subsequently gain employment or be enrolled in an institution of higher education or other post-secondary education and/or training.

A HEP project may provide the following services to program participants:

- Recruiting of program participants (local institutions make contacts with high schools, health agencies, and Department of Labor for recruiting)
- Instruction in study skills, math, reading, writing, and communication skills
- Academic, career, and personal guidance, counseling, and testing services
- Housing support or on-campus residential aid while participating in the HEP project (program participant may be a commuter or a resident)
- Services to expose participants to a range of career options
- Support services for intellectual, social, cultural and personal development (e.g., participation in cultural events)

These services are provided to assist the student in obtaining (listed by priority according to an interviewee):

- (1) GED accomplishment
- (2) Military service placement
- (3) Job training assistance
- (4) Admittance to a higher education institution

The total budget for HEP for program year 1983-84 was approximately \$6.3 million (an average of \$1,500-2,000 per student) and served approximately 2,800 students under 20 HEP projects.

#### The College Assistance Migrant Program

The College Assistance Migrant Program (CAMP) (also previously administered under the U.S. Department of Labor and transferred to the

U.S. Department of Education in 1980) assists students who perform or whose families perform migrant or other seasonal type farmwork, to successfully pursue a program of post-secondary education while enrolled in their first undergraduate year at an institution of higher education.

The services provided under CAMP are:

- Recruiting of program participants (e.g., grantees go to area high schools to recruit)
- Academic, career, and personal guidance, counseling and testing services
- Housing support or on-campus residential aid while participating in the program
- Services to expose participants to a range of career options
- Support services for intellectual, social, cultural, and personal development (e.g., participation in cultural events)
- Tutoring and supplementary instruction in basic skills, subject areas in which student is enrolled, and other areas such as study skills
- Counseling (One interviewee noted there is a heavy emphasis on counseling - that it is mandated to ensure success.)

The total budget for program year 1983-84 was \$1.2 million (average of \$2,100 per student) and 565 students were served under 6 CAMP projects.

Handicapped Migratory Agricultural and Seasonal Farmworkers Vocational Rehabilitation Service Program

This program is authorized under Section 312 of the Rehabilitation Act as amended by P.L. 98-221 and the Amendments of 1974, and is administered under the U.S. Department of Education. The services provided under this program are comprehensive vocational rehabilitation

services which include a strong emphasis on outreach efforts, specialized bilingual counseling, physical and mental restoration, prevocational adjustment, vocational training and job placement. The objective is to aid disabled migrants between the ages of 16 and 65 in either returning to their previous work or in obtaining new employment. Handicapped agricultural workers may be eligible whether they are migratory (employment requires temporary residency near the work site) or seasonal workers (employment is within commuting distance).

In the program review undertaken by RSA, the agency reported that there is a high degree of disability within the migrant worker population which affects its employability. As a group, migrant workers frequently encounter accidents, are exposed to unusual chemical processing, inferior sanitation, extremes of weather, and poor housing conditions that may lead to ill health and disability. When confronted with a disability, migrant/seasonal workers tend to become socially isolated and often will not seek assistance outside of their culture, if at all. Because of the unique characteristics of the target population (i.e., mobility, cultural differences and language barriers) project staff are usually bilingual and culturally sensitive.

The total budget for FY 1984 was \$950,000 awarded as project grants to 11 State grantees (the average award being \$86,400) and served approximately 3,000 migrant/seasonal workers.

#### Migrant Health Centers Program

The Migrant Health Centers Program is administered under the U.S.

Department of Health and Human Services (HHS). With the enactment of the Migrant Health Act in 1962 (Public Law 87-692), the Congress initiated a federal grant program to make health services accessible to the migrant population. The types of services provided under this program are primary health services, preventative health services, preventative dental services, pharmaceutical services, and transportation for such services if necessary.

Some of the funds for the Migrant Health Centers Program are combined with funds from the Community Health Centers Program which is also administered through the Department of Health and Human Services and is discussed in the following section. The Community Health Centers are located in medically underserved areas which may be urban or rural communities. Of the 125 Migrant Health Centers, 83 were jointly funded with Community Health Program monies (74 in rural areas and 9 in urban communities). Migrant and seasonal farmworkers are eligible to receive services under both programs; however, because the Community Health Centers are not specifically designed for assistance to the migrant and seasonal farmworker population, services may not adequately meet their unique needs.

The annual budget for FY 1984 was \$42.0 million which was awarded as project grants to 125 grantees (funding levels for each grantee are dependent upon numbers served) and approximately 450,000 are served on a yearly basis.



### Migrant Head Start Program

The Migrant Head Start Program is administered under the Administration for Children, Youth and Families, U.S. Department of Health and Human Services. The Head Start Program has an overall goal of bringing about a greater degree of social competence in children (age birth to five years) of low income families - a comprehensive developmental program. Social competence is defined as the child's effectiveness in dealing with both present environment and later responsibilities of school and life. Social competence takes into account the "interrelatedness of cognitive and intellectual development, physical and mental health, nutritional needs, and other factors that enable a developmental approach to helping children achieve social competence" (Project Head Start, 1985:2). These types of developmental services are not only targeted at the migrant children, but also are offered for the parents and siblings of eligible children because parents/siblings are viewed as having principal influence on the child's educational and developmental process. Other services also included are educational, medical, dental, and nutritional.

The budget for FY 1984 was approximately \$37.5 million which was awarded as project grants to 33 States serving 18,000 children at an average cost of \$2,200 per child.

### Migrant and Seasonal Farmworker Program

The Migrant and Seasonal Farmworker Program is administered by the U.S. Department of Labor's Employment and Training Administration. The

program is authorized under Title IV, Section 402 of the Job Training Partnership Act (JTPA), P.L. 97-300. The Act provides services "for those individuals who suffer chronic seasonal unemployment and underemployment in the agricultural industry" (Federal Register, Vol. 48, No. 204, 1983: 48771).

The objectives of this program are to provide employment and training services to migrant and seasonal farmworkers with the intent of moving the migrants out of migrant or seasonal labor and moving them into permanent jobs that would get them out of poverty.

Although the primary focus is on training and employment services, program officials report they provide any legitimate services which help an individual become employed, such as emergency health services, housing assistance, transportation assistance or other such support services.

The total budget for program year 1984 was \$57.0 million which was awarded as formula grants to 53 grantees in 49 States. This program served 16,000 persons in 1983 and was expected to serve approximately the same number for program year 1984.

#### Migrant Legal Action Program

The Migrant Legal Action Program, under the administration of Legal Services Corporation, provides support services for 70 field offices across the country which provide legal assistance to migrant farmworkers. These support services include:

- Research
- Training
- Advice to attorneys on legal matters
- Resource materials

The field office site is where direct representation and counseling of clients occurs. These offices will handle civil legal matters (such as pesticide poisonings); however, they do not handle criminal cases. The objective of these programs is to provide legal assistance to "indigent migrant farmworkers." Staff members in the field offices also provide awareness services to educate the migrants concerning their legal rights.

Legal Services Corporation provided \$450,000 to the Migrant Legal Action Program for 1985. Additionally, there are 70 field offices which receive approximately \$300,000 each from a separate budget channelled through Legal Services Corporation. The service unit of this program is legal cases; numbers of migrants served under these programs are not available.

#### Women, Infants, and Children Special Supplemental Food Program

The Special Supplemental Food Program for Women, Infants, and Children (WIC) is administered through the Food and Nutrition Service in the U.S. Department of Agriculture. In 1972, P.L. 92-433 amended the Child Nutrition Act of 1966 and authorized the WIC program for fiscal years 1973 and 1974 on a pilot basis. The WIC Program has since been

amended by various laws and funding levels have steadily increased. In 1977 the final WIC regulations were published which identified migrants as a special population to be served by the program.

According to the program design, the WIC Program:

- Is operated through health departments or equivalent State agencies
- Has health professionals determine participant eligibility
- Provides nutritious food supplements to program participants
- Provides educational information concerning nutrition, taking into account the participant's individual nutritional needs and household situations
- Funds the administrative and management expenses of the program

The budget for 1984 was \$1.4 billion (\$5M for migrant projects) awarded as project grants to approximately 30 States. In 1984 between October and June, a total of 238,592 migrants were served under this program. (The number served includes duplicative counts. It is based on a participation log kept by each local agency which indicates the monthly caseload. Therefore, each time a person receives services, he/she is entered on the log at the agency which provides the services.)

## 2.2 Programs That Serve Migrants as a Subset of Eligible Program Participants

The following section provides a description of the seven programs which serve migrants as part of a larger target population.

### Pesticides Farm Safety Program

The Pesticides Farm Safety program implemented under the Environmental Protection Agency (EPA), focuses on "protection of agricultural workers and communities" (Billings, 1985:1). The program was established in 1970 and consists of several projects including regulatory, research, training, and enforcement efforts.

The EPA has recently produced two new educational tapes which provide training on pesticide safety, not only for the farmworkers but for those agricultural workers who are involved in the mixing, loading and application of pesticides (both tapes are available in English and Spanish). EPA has conducted research concerning pesticide exposures and toxicity to evaluate the potential hazards to children who are involved in agricultural work. Additionally, EPA has provided laboratory analysis, technical support and training to approximately 2,000 staff members of Migrant Health Centers across the country. They provide a toll-free telephone service for medical personnel who need assistance in diagnosing and treating pesticide poisonings.

The total budget for the pesticides program in 1984 was \$67.7 million. EPA estimates there are four million farmworkers and they represent the population that the EPA protects through regulations and awareness/training programs. Although actual numbers served by this program are unavailable, the EPA conducted a study between 1971 and 1976 to gather data on hospital admissions for pesticide poisonings. Their study revealed that "approximately 27 percent of all poisonings were among occupational groups such as farmers, farmworkers, applicators, and manufacturing plant employees" (Billings, 1985:1). This, as noted by the EPA, represents only partial data on pesticide poisonings because many victims are undiagnosed or are not treated in a hospital setting.

#### Food Distribution Program

Through the Food Distribution Program, the U.S. Department of Agriculture (USDA) provides food to help meet some of the nutritional needs of children and adults in this country. The Food Distribution Program basically has two purposes:

- (1) To help strengthen the agricultural market by purchasing (from farmers) surplus foods they are unable to sell
- (2) To improve the nutrition of the elderly, needy families, and other special populations

The USDA has the purchased food processed, packaged and transported to designated locations in each State. The State distributing agencies (usually located in the State department of agriculture or education) then supply the food to eligible institutions and other distributors of donated food such as schools and child care centers. The foods are then

passed on to individuals (and their families) who are low-income or unemployed. Migrants are eligible to receive services not only due to their low income level, but also because they experience repeated periods of unemployment.

The total budget for this program is \$50.0 million which is allocated to States based on the number of unemployed and low income persons (formula grants). In 1983, over 2.5 billion pounds of food were purchased and distributed to the total eligible population. (The number of individuals who received food under this program is not available.)

### The Food Stamp Program

The Food Stamp Program is administered nationally by the U.S. Department of Agriculture's Food and Nutrition Service, and locally by the State welfare agencies. The main goal of this program is to provide a nutritionally balanced diet among low income households. The Food Stamp Program became a national program in 1974 at which time the Congress required that States offer food stamps to the poor.

The program provides food stamps on a monthly basis, which are to be used to supplement the food purchasing ability of eligible low income households. In order to qualify for the program, households must meet eligibility criteria and provide proof of their statements about household circumstances. Individuals and their families may qualify if they:

- Work for low wages

- Either are unemployed or only work part time
- Receive welfare or other assistance payments
- Are elderly or disabled and live on a small income

The requirements which migrant farmworkers must meet to be eligible for services under this program will be discussed in Section 3.1.2 - Eligibility Criteria for Program Participation.

The total budget for the Food Stamp Program in fiscal year 1983 was \$12.7 billion, and served 21.6 million people (at an average of \$42.99 per person) each month. (The number served includes all individuals who received food stamps.)

#### Employment Services

The Employment Services program is administered under the U.S. Department of Labor's Employment and Training Administration. The Wagner-Peyser Act of 1933 established the Federal-State Employment Service consisting of a nationwide network of public employment offices. In 1982, Title V of the Job Training Partnership Act (JTPA), P.L. 97-30, amended the Wagner-Peyser Act with one of the key changes resulting in services for special groups such as veterans, migrant and seasonal farmworkers, handicapped and disadvantaged job seekers, youth, minorities, and older workers.

The employment services available to migrant and seasonal farmworkers are related to both agricultural and non-agricultural employment. Counseling and testing services are available for job applicants who are



then referred to potential employers. The State employment agencies work closely together as a network of labor exchanges matching migrants to the work available.

This program is structured on an equivalent service concept, that is that migrants should be provided services the same as other job applicants. Therefore, in an effort to eliminate discrimination towards migrant or seasonal farmworkers (as well as other special groups included under JTPA) who seek assistance at State employment offices, each State employs a monitor advocate who reports to the monitor advocate at the federal level. These staff members monitor services to migrants, and also receive and investigate complaints made by migrant applicants.

The total budget for 1984 was approximately \$740.0 million and is awarded as formula grants to State employment agencies (including Puerto Rico, Guam and the Virgin Islands). In 1984, approximately 116 135 migrant and seasonal farmworkers received employment assistance through Employment Services.

#### Employment Standards Administration

Under the U.S. Department of Labor, Wage and Hour Division, the Employment Standards Administration enforces compliance with existing employment standards affecting both employees and employers. In 1983, the Farm Labor Contractor Registration Act (FLCPA) was replaced by the Migrant and Seasonal Agricultural Worker Protection Act (MSPA), P.L. 97-470.

The MSPA provides important workers' protections to migrant and seasonal agricultural workers including:

- Vehicle safety
- Housing safety and health requirements
- Disclosure of wages, hours and other working conditions
- Maintenance of necessary records
- Provisions to workers of itemized information concerning pay and withholdings

In the event that migrant agricultural workers are recruited for employment by farm labor contractors, agricultural employers and agricultural associations, the following information must be disclosed to them in writing (English, Spanish or other languages as appropriate):

- Where they will work and if there is currently a strike, work stoppage, slowdown or interruption of operations by employees at the work site
- The crops and types of activities on which they will work
- Length of employment
- Wages to be paid
- Whether housing, transportation or other benefits are available and charges for such benefits
- The terms and conditions for occupying migrant housing
- Whether the employer will receive commissions or other such benefits for sales made to the workers by an establishment at the area of employment

Seasonal workers receive the above information upon request when they are offered work (as opposed to migrants who must be provided this information when recruited for employment).

The following rights of migrant and seasonal workers are protected under the MSPA:

- To have the terms of employment met
- To have the farm labor contractors show proof they are registered with the Department of Labor
- To be paid wages when due
- To receive written, itemized statements of wages earned for each pay period including any deductions and the reason for deductions
- To buy goods and services from sources of their choice
- When provided transportation, vehicles are to be insured, operated by licensed drivers and meet federal and State safety standards
- For migrants who are provided housing, the housing must meet federal and State health and safety standards and the terms of occupancy must be posted in a conspicuous place at the housing site, or presented to them
- At the job site all rights must be posted in a conspicuous place

Additionally, farm labor contractors must register with the Department of Labor and obtain registration certificates which specify the type of activities they are allowed to perform. Employees of farm labor contractors must also be registered with the Department of Labor. Contractors and employees must carry the registration certificates with them.

In 1984, according to the FY 1984 Annual Report, the Wage and Hour Division accomplished the following:

- 5,273 MSPA compliance actions ... which resulted in civil money penalties totaling almost \$900,000 assessed against violators

- 164 farm labor contractors were cited for employing a total of 1,398 illegal alien workers (the MSPA prohibits farm labor contractors from knowingly hiring illegal alien workers)
- 190 revocations, refusals to issue and refusals to renew farm labor contractor certificates of registration
- 12,500 registrants (including 9,400 farm labor contractors and 3,100 farm labor contractor employees) who employed approximately 375,000 crew members

The total budget for 1984 was approximately \$3.0 million which fund advisory services, counseling and investigations of complaints.

### Occupational Safety and Health Administration

The Occupational Safety and Health Administration (OSHA) is administered by the U.S. Department of Labor. In an effort to reduce employment related injuries and illnesses at the workplace, OSHA:

- Develops and promulgates occupational safety and health standards
- Develops and issues regulations
- Conducts investigations/inspections to determine compliance or non-compliance with health and safety standards and regulations
- Issues citations and processes penalties for non-compliance with safety and health regulations and standards

The most important service provided by OSHA which directly affects the migrant population is that of housing inspections. OSHA inspects temporary labor housing camps for migrants to check for safety and health violations. OSHA will also handle complaints made by migrants living in temporary labor housing.

Migrant housing camps are inspected by OSHA while they are occupied. The Employment Standards Administration handles post-occupancy inspections and the Employment and Training Administration carries out pre-occupancy housing inspections (both are also administered under the Department of Labor). These three administrations, in a tri-agency agreement, maintain a network of referrals that enables them to maintain a roster of housing camps. Agricultural employers and employees names are obtained when they apply for certificates of registration and these are passed among the three agencies.

In 1984, the total budget for OSHA was \$200 million. OSHA counts the number of migrants who live at a housing camp at the time of inspection and for October of 1983 through September of 1984, a total of 969 inspections were conducted with a total of 21,184 migrants living at the camps.

#### Community Health Centers Program

The Community Health Centers Program, administered under the U.S. Department of Health and Human Services, was established under the Public Health Service Act, Section 330 in 1975. Under this Act, medically underserved areas and populations became eligible for health assistance. Although the Migrant Health Program is a categorically separate program, it operates in conjunction with the Community Health Centers Program for the medically underserved. Because of the overlap of target areas and service recipients between migrant programs and programs for the medically underserved, HHS decided it would, in some cases, be more

efficient and economical to operate one health center in a community that would serve migrants as well as the medically underserved. The funds are often combined to serve both groups at one center, resulting in over one half of the funds designated for migrants being used in support of integrated health centers for the medically underserved. (The Department of Health and Human Services funds them with monies from both programs.)

Under the Community Health Centers Program, areas or groups meeting three of the following four criteria are given priority in consideration of grantee awards:

- A high migrant impact area
- Medically underserved
- Has a health personnel shortage
- Has high infant mortality

Additionally, according to a program official, there are two other criteria also considered beyond the above mentioned four. They are:

- The percentage of people in poverty
- The ratio of doctors to the population in the area

Although the emphasis for both programs is on primary care (i.e., physician services, diagnostic laboratory and radiology services, preventative health and dental care, emergency health services, and transportation as needed for adequate patient care) and the health assistance provided is basically identical, the Community Health Centers target the medically underserved population. Consequently, although migrants may receive services at the Community Health Centers, the

services are not always adequate for migrants. The Migrant Health Centers provide three services that the Community Health Centers Program does not. They are:

- Hospitalization and environmental programs
- Health screenings for infectious and parasite diseases and presentation of accident protection programs when appropriate
- Provision of mandated bilingual services which the Community Health Centers provide only as supplemental health services

The funding level for the Community Health Centers Program for 1984 was approximately \$360.0 million which was awarded to 600 grantees. Of the 600 grantees 83 are jointly funded with Migrant Health Program monies. In 1984, 300,000 migrants were served under this program.

### 2.3 Total Budget, Number of Grantees and Reported Number Served Annually

Federal agencies provided approximately \$416 million in grants and direct services to migrants in FY 1984 through 9 programs targeted at migrants. In addition to this funding, over \$11 billion supports programs which serve migrants as part of a larger population. It is not possible to determine what portion of these funds are provided to migrants, therefore analysis in this section will be directed towards those 10 programs which specifically serve the migrant population.

As indicated in Exhibit A and Table 2, of the 9 programs we examined that are specifically designed to provide services for migrants, 3 are educational programs and account for 66 percent of all funding. The State Migrant Education Program alone accounts for 63 percent of total funding for migrant programs. The WIC Program, which provides nutritional assistance for migrants, accounts for approximately two percent of all funds; Migrant Legal Action Program monies are less than one percent of total funds. Funds for the employment services offered through the Migrant and Seasonal Farmworker Program and the Handicapped Migratory Agricultural and Seasonal Farmworker Vocational Rehabilitation Services Program combined are 14 percent of total funding (the Migrant and Seasonal Farmworker Program accounting for approximately 13.7 percent). And finally, Migrant Head Start monies account for approximately nine percent of the total funding.

Of the 9 programs specifically for migrants 3 award grants on a formula basis and 6 award grants on a competitive project or



Exhibit A.  
Total Budget  
By Primary Service Objective

Programs Primary  
Service Objective

Programs Specifically for Migrants

Programs Which Serve Migrants as a  
Subset of the Eligible Population

EDUCATIONAL	• HEP	\$ 6.3M			
	• CAMP	\$ 1.2M			
	• MEP*	\$264.5M			
	SUBTOTAL	\$274.1M			
NUTRITIONAL	• WIC Migrant Program	\$ 5M**			
			• Food Stamp Program	\$ 10B	
			• Food Distribution Program	\$ 50M	
	SUBTOTAL	\$ 5M	SUBTOTAL	\$10.05B	
EMPLOYMENT	• Migrant and Seasonal Farmworker Program	\$ 57M		• Employment Services	\$740M
	• Handicapped Migratory Agricultural and Seasonal Farmworker Voc. Rehab. Services Program	\$ 950K		• Employment Standards Administration	\$ 3M
				SUBTOTAL	\$743M
		SUBTOTAL	\$57.9M		
HEALTH	• Migrant Health Centers Program	\$ 42M		• Pesticides Farm Safety Program	\$ 67.7M
				• Community Health Centers Program	\$ 360M
				• OSHA	\$ 200M
		SUBTOTAL	\$ 42M	SUBTOTAL	\$ 627.7M
LEGAL	• Migrant Legal Action Program	\$450K			
	SUBTOTAL	\$450K			
SOCIAL	• Migrant Head Start Program	\$ 37M			
		SUBTOTAL	\$ 37M		
	TOTAL	\$416.54M	TOTAL	\$11.42B	

\*This figure includes \$2.1M for the Intra/Interstate Coord. Project

\*\*Total WIC budget is approximately \$1.4 billion.

**Table 2**  
**Total Budget, Number of Grantees, Reported Number Served Annually**

Program	Total Budget	Number of Grantees	Reported Number Served Annually
High School Equivalency Program (HEP)	\$6.3 million	20 grantees (formula grants) average grant award is \$315,000 (\$1500-2000 per student)	2,800
College Assistance Migrant Program (CAMP)	\$1.2 million	6 grantees (discretionary project grants) average grant award is \$200,000 (\$15,000 per student)	565
Handicapped Migratory Agricultural and Seasonal FarmWorker Vocational Rehabilitation Services Program	\$950,000	11 grantees (discretionary project grants) average grant award is \$86,400	3,000
State Migrant Education Program	\$264,524,000	51 grantees (formula grants)	593,000
Migrant Head Start Program	\$37.0 million	33 grantees (project grants) (\$2200 per child)	18,000
Migrant Health Centers Program	\$42.0 million	125 grantees (project grants)	450,000
Migrant Legal Action Program	\$450,000	1 migrant center	N/A

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**Table 2 (Continued)**  
**Total Budget, Number of Grantees, Reported Number Served Annually**

Program	Total Budget	Number of Grantees	Reported Number Served Annually
Migrant and Seasonal Farmworker Program	\$57.0 million	53 grantees (formula grants)	16,000
Occupational Safety and Health Administration (OSHA)	\$200.0 million	States receive funding by matching Federal dollars.	N/A
Employment Services	\$740.0 million	Grantees are the States, Guam, Virgin Islands & Puerto Rico (formula grants)	116,135 (total migrants)
Employment Standards Administration	\$3.0 million	\$3.0 million dollar budget covers salaries and expenses of advisors, counselors & investigators of complaints	<p>In FY 1984 there were:</p> <ul style="list-style-type: none"> <li>● 12,500 registrants (including 9,400 farm labor contractors and 3,100 farm labor contractor employees) who employed approximately 375,000 crew members</li> <li>● 5,273 MSPA compliance actions</li> <li>● 190 revocations, refusals to issue and refusals to renew farm labor contractor certificates of registration</li> <li>● 164 farm labor contractors cited for employing 1,398 illegal alien workers.</li> </ul>

2-32

**Table 2 (Continued)**  
**Total Budget, Number of Grantees, Reported Number Served Annually**

<b>Program</b>	<b>Total Budget</b>	<b>Number of Grantees</b>	<b>Reported Number Served Annually</b>
Pesticide Farm Safety Program	\$67.7 million	N/A	N/A
Food Distribution Program	\$50.0 million	Formula grants to states - awards based on 40% unemployed and 60% low income	Over 2.5 billion pounds of food were distributed in 1983
Women, Infants and Children (WIC) Program	\$1.4 billion total budget - \$5 million for migrants	Project grants to approximately 30 states	Between October and June 1984, 238,592 migrants were served (cumulative total for 1983 was 293,870)
Food Stamp Program	\$12.7 billion	54 grantees - program pays for 100% of costs for benefits - splits administrative costs 50/50 with states (average of \$42.99 per participant)	21 million per month
Community Health Centers Program	\$360.0 million	600 grantees (380-400 are located in rural areas and are jointly funded with Migrant Health Centers)	300,000 (total migrants)

2-33

discretionary basis. The Migrant Health Centers Program has the largest number of grantees and provides services to the second largest number of participants with the third largest amount of funds. The Migrant Education Program serves the largest number of participants with the largest amount of monies.

The Department of Education provides services to migrants through 3 programs and serves a total of 526,365 migrants of all ages. Employment services are provided to 19,000 migrants under 2 programs. Of the 9 programs which specifically serve migrants the total cumulative reported number served is 1,307,235 (excluding the Migrant Legal Action Program which did not provide us with a number served). If the estimate of 2.7 million migrant and seasonal farmworkers and their families made by GAO in a study of the Migrant Health Program is compared to the number of migrants served under the nine programs we have examined, it would appear that up to 50 percent of migrant and seasonal farmworkers could be receiving categorical services under various programs. However, this estimate, is overstated. It includes duplicative counts since some migrants and their families are receiving services from more than a single program. Other problems with this type of estimate are described in later sections.

### SECTION 3.0 COMPARATIVE ANALYSES

This section provides comparative analyses of the 16 programs across the following 8 categories:

- Definition of the migrant or participant population
- Eligibility criteria for program participation
- Numbers served, geographical locations and seasonal variations
- Identification procedures for recruiting
- Tracking procedures
- Coordination of services provided
- Data bases and data collected and maintained
- Methods of program evaluation

### 3.1 Definitions of and Eligibility Criteria for the Migrant or Participant Population

As part of this study, program-specific definitions of the migrant or participant population were obtained, as well as the eligibility requirements that must be met to obtain services from each program. The following two sections provide a description and analysis of these definitions and eligibility criteria.

#### 3.1. Definitions of the Migrant or Participant Population

There is no single, universally accepted definition of a "migrant" and various federal programs which serve migrants define them in different manners. The following section analyzes how migrants or the participant population are defined - it does not look at how these definitions are interpreted in practice. To analyze how the various definitions are interpreted would require research at the local level. After analyzing the various definitions for the programs, three factors appeared with differing frequency:

- (1) Performance of agricultural work
- (2) The search for employment requires travel that results in the inability to return to a permanent residence
- (3) Employment requires travel and the inability to return to a permanent residence or employment is within commuting distance of a permanent residence

As shown in Exhibit B and Table 3, the main criterion in establishing a definition of a migrant is that the person (or the family) is employed in and performs agricultural work. All but 3 of the 16 programs (OSHA, Food

**EXHIBIT B  
COMPARISON OF DEFINITIONS**

<b>Program</b>	<b>Performance of Agricultural work</b>	<b>Travel While Seeking Employment</b>	<b>Work Within Commuting Distance</b>
State Migrant Education	X	X	X
College Assistance Migrant	X	X	
High School Equivalency	X	X	
Handicapped Migratory Agric/Seas. Farmworker Voc. Rehab.	X	X	X
Migrant Health Centers	X	X	X
Migrant Legal Action	X	X	
Migrant Head Start	X	X	
Migrant and Seasonal Farmworker	X	X	
Employment Standards Admin.	X	X	X
Employment Services	X		
Occupational Safety and Health Admin.			
Food Distribution			
Food Stamp		X	
Pesticides Farm Safety	X		
Community Health Centers	X	X	X
Women, Infants and Children	X	X	X



Table 3

## Definitions of Migrant or Participant Population

PROGRAM/AGENCY	DEFINITION	REPORTED NUMBER SERVED ANNUALLY
State Migrant Education Program	A child who has moved from one school district to another during the past year and who has a parent/guardian who moved from one district to another to obtain temporary/seasonal employment in agriculture, fishing or related food processing work. A child may be considered migratory for up to an additional 5 years after the parent/guardian has ceased to migrate (with the consent of the parent/guardian).	593,000
College Assistance Migrant Program (CAMP)	Migrant Farmworker - a seasonal farmworker (i.e., a person who within the past 24 months, was employed for at least 75 days in farmwork and primary employment was in farmwork on a temporary or seasonal basis - not a constant year-round activity) whose employment required travel that precluded the farmworker from returning to their permanent place of residence within the same day.	565
High School Equivalency Program (HEP)	Migrant Farmworker - a seasonal farmworker (i.e., a person who within the past 24 months, was employed for at least 75 days in farm work and primary employment was in farmwork on a temporary or seasonal basis - not a constant year-round activity) whose employment required travel that precluded the farmworker from returning to their permanent place of residence within the same day.	2,800

Table 3 (Continued)

## Definitions of Migrant or Participant Population

PROGRAM/AGENCY	DEFINITION	REPORTED NUMBER SERVED ANNUALLY
Handicapped Migratory Agricultural and Seasonal Farmworker Vocational Rehabilitation Service Program	<p>Two definitions:</p> <ul style="list-style-type: none"> <li>● <u>Migratory</u> agricultural worker is a person who occasionally or habitually leaves their residency to engage in agricultural employment in another locality in which they reside during the period of such employment.</li> <li>● <u>Seasonal</u> agricultural worker engages in agricultural work on a seasonal or temporary basis within commuting distance from normal residency.</li> </ul>	3,000
Migrant Health Centers Program	<p>Two definitions:</p> <ul style="list-style-type: none"> <li>● <u>Migratory</u> agricultural worker is a person whose principal employment is in agriculture on a seasonal basis, who has been so employed within the last 24 months and who establishes a temporary abode for purposes of such employment.</li> <li>● <u>Seasonal</u> agricultural worker is a person whose principal employment is in agriculture on a seasonal basis and who is not a migratory agricultural worker.</li> </ul>	450,000
Migrant Legal Action Program	A person who has moved from one district to another to obtain temporary/seasonal employment in agricultural, fishing or related food processing work.	N/A

Table 3 (continued)

## Definitions of Migrant or Participant Population

PROGRAM/AGENCY	DEFINITION	REPORTED NUMBER SERVED ANNUALLY
Migrant Head Start Program	Informal*, Family wage earners who migrate within a 12 month period (with their children) in pursuit of agricultural work.	18,000
Migrant and Seasonal Farmworker Program	Seasonal farmworker who performs or has performed agricultural work 12 consecutive months in the last 24 months preceding application-which requires travel and inability to return to domicile within same day.	16,000
Employment Standards Admin.	<p>Two definitions:</p> <ul style="list-style-type: none"> <li>● <u>Migrant</u> agricultural workers are employed in agricultural work of a seasonal or temporary nature who are required to be absent overnight from their permanent residence.</li> <li>● <u>Seasonal</u> agricultural workers are employed in agricultural work of a seasonal or temporary nature who return to their permanent residence at night.</li> </ul>	<p>In FY 1984 there were:</p> <ul style="list-style-type: none"> <li>● 12,500 registrants (including 9,400 farm labor contractors and 3,100 farm labor contractor employees) who employed approximately 375,000 crew members</li> <li>● 5,273 MSPA compliance actions</li> <li>● 190 revocations, refusals to issue and refusals to renew farm labor contractor certificates of registration</li> <li>● 164 farm labor contractors cited for employing 1,398 illegal alien workers.</li> </ul>

\* Informal - there is no written definition, however a definition is "understood"

Table 3 (continued)

## Definitions of Migrant or Participant Population

PROGRAM/AGENCY	DEFINITION	REPORTED NUMBER SERVED ANNUALLY
Employment Services	Very broad and basically economic: A person who has historically performed seasonal or agricultural work.	116,135
Occupational Safety and Health Administration (OSHA)	Informal*: Those persons who live in temporary labor camps.	N/A
Food Distribution Program	No specific definition for migrants. Broad program eligibility criteria are low-income level and whether the person is also eligible for other family assistance programs.	Over 2.5 billion pounds of food were distributed in 1983
Food Stamp Program	Informal*: Those persons who, for purposes of finding work, must be away from their homes overnight or longer.	21 million (per month)
Environmental Protection Agency - Pesticides Farm Safety Program	No specific migrant definition - seasonal or agricultural workers.	N/A
Community Health Centers Program	Migrants may be served in rural areas where Community Health Centers are located (some rural centers are jointly funded with Migrant Health Centers).	300,000 (total migrants)

\* Informal - there is no written definition, however a definition is "understood"

Table 3 (continued)

## Definitions of Migrant or Participant Population

PROGRAM/AGENCY	DEFINITION	NUMBER SERVED
Women, Infants and Children (WIC) Program	<p>Two definitions:</p> <ul style="list-style-type: none"> <li>● <u>Migratory</u> agricultural worker is a person whose principal employment is in agriculture on a seasonal basis, who has been so employed within the last 24 months and who establishes a temporary abode for purposes of such employment.</li> <li>● <u>Seasonal</u> agricultural worker is a person whose principal employment is in agriculture on a seasonal basis and who is not a migratory agricultural worker.</li> </ul>	Between October and June 1984, 238,592 migrants were served (cumulative total for 1983 was 293,870)
	Migrant farmworker means an individual whose principal employment is in agriculture on a seasonal basis who has been so employed within the last 24 months and who establishes, for the purposes of such employment, a temporary abode.	

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Distribution Program and Food Stamp Program) include performance of agricultural work as part of their definition.

OSHA defines the participant population only as those persons who live in temporary labor camps, and the Food Stamp and Food Distribution Programs base their definitions of program participants primarily on low income levels. Additionally, two programs (State Migrant Education Program and Migrant Legal Action Program) include fishers in their definition.

The second most common factor in the various definitions is consideration of mobility. The following six programs require that the participants (or their parents) travel while seeking employment and may be unable to return to their permanent residence the same day:

- College Assistance Migrant Program
- High School Equivalency Program
- Migrant Legal Action Program
- Migrant Head Start Program
- Migrant and Seasonal Farmworker Program
- Food Stamp Program

There are six programs which allow participation if the workers are migratory or if they perform agricultural work on a seasonal basis which is within commuting distance of their permanent residence. These programs are:

- Handicapped Migratory Agricultural and Seasonal Farmworker Vocational Rehabilitation Service Program
- State Migrant Education Program
- Migrant Health Centers Program
- Employment Standards Administration
- Women, Infants and Children Program
- Community Health Centers Program

These programs, as previously stated, allow those persons who must establish a temporary living arrangement due to the inability to return to their permanent residence to receive program services as well as those persons who, although they also perform similar agricultural work, return to their permanent residence that same day.

The State Migrant Education Program considers children to be migratory for an additional five years after the parent/guardian has ceased to migrate and may receive migrant educational services with the consent of the parent or guardian. This resulted from Public Law 90-247 which amended the Migrant Education Program in 1968 to include formerly migrant children for up to five years if they resided in an area served by a migrant education project and had their parents' consent. This amendment was the outcome of congressional belief that, after leaving the migrant stream, children of migrant parents are often placed in homes with friends or relatives and they may experience cultural difficulties when enrolled in a local school system even after receiving services in their first year of living in a community. It was believed that such continuity of efforts was necessary to integrate these children successfully into the local educational system.

It appears that 6 of the total of 13 programs which have a specific definition for migrants and seasonal farmworkers, allow non-migratory agricultural workers to participate in their programs. Non-migratory workers are "little better off in terms of wages, working conditions, and options for alternative employment" because they are also dependent upon agriculture as their primary source of income (Mankiewicz, 1981:184). Additionally, migratory and non-migratory populations may overlap. As one interviewee stated:

"... sometimes they're migrants and sometimes they're not - their status changes."

Migrants may "settle out" either on a temporary or permanent basis becoming non-migratory. On the other hand, non-migratory workers may reenter the migrant stream either within or outside of their home States if they need to travel to find work.

Because there is no national definition applicable to all federal programs, migrant and seasonal farmworker participation is not reported in a uniform manner. To attempt to compare and contrast the number of program participants based on the definition of the eligible program participants would be much like comparing apples to oranges.



### 3.1.2 Eligibility Criteria For Program Participation

There are four basic criteria which must be met in some combination for participation in the programs identified in this study. For purposes of analysis these criteria have been categorized as follows:

- Employment
- Mobility
- Ages served
- Income level or other criteria

As shown in Exhibit C and Table 4, 13 of the 16 programs require that the participant or their parents be engaged in the performance of agricultural work. These are the same 13 that include performance of agricultural work in their definitions. Similarly, the three programs that do not specify performance of agricultural work in their definitions (OSHA, Food Distribution Program and Food Stamp Program), do not require that program eligibility be based on performance of agricultural work or any other specified employment activity.

Additionally, the State Migrant Education Program and Migrant Legal Action Program also include fishers as eligible under their programs. The Migrant Health Centers Program, however, excludes fishers as part of the eligible population.

Exhibit C  
COMPARISON OF ELIGIBILITY CRITERIA

Program	Employed In		Age Limits	Mobility			Low Income
	Agric.	Fishing		Must Be	May Be	Not Specified	
State Migrant Education	X	X	X		X		
College Assistance Migrant	X			X			
High School Equivalency	X		X	X			
Handicapped Mig. Agric. Seas. Farmworker Voc. Rehab.	X		X		X	X	
Migrant Legal Action	X	X		X			
Migrant Head Start	X		X	X			
Migrant and Seasonal Farmworker	X		X	X			
Migrant Health Centers	X				X		
Employment Standards Admin.	X				X		
Employment Services	X		X			X	
Pesticide Farm Safety	X					X	
Community Health Centers	X				X		
Women, Infants and Children	X		X		X		
Occupational Safety and Health Admin.						X	
Food Distribution						X	
Food Stamp				X			X

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Table 4

## Eligibility Criteria for Program Participation

Program	Employment	Mobility	Ages(s) Served	Other Criteria
State Migrant Education Program	Parent works in temporary or seasonal employment in agricultural, fishing or related food processing work	Child has moved from one school district to another and whose parent or guardian moved from one district to another. May be considered migratory for up to an additional 5 yrs. after parent has ceased to migrate.	Funded for ages 5-17 however, serve 5-21	May not be high school graduate
3-14 College Assistance Migrant Program (CAMP)	Must have been employed for at least 75 days of the last 24 months in farmwork and primary employment was farmwork on a temporary or seasonal basis - not a constant year-round basis	Employment requires travel that precludes them (students and/or parents) from returning to permanent residence within the same day.	No age limit	Student must have high school diploma or GED and be enrolled or admitted as full-time student at the participating IHE and not be beyond the first academic year of study
High School Equivalency Program (HEP)	Must have been employed for at least 75 days of the last 24 months in farmwork and primary employment was farmwork on a temporary or seasonal basis - not a constant year-round basis	Employment requires travel that precludes them (students and/or parents) from returning to permanent residence within the same day.	Above the compulsory school age of 16 years	May not be currently enrolled in an elementary or secondary school

Table 4

## Eligibility Criteria for Program Participation (Cont.)

Program	Employment	Mobility	Ages(s) Served	Other Criteria
Handicapped Migratory Agricultural and Seasonal Farmworker Vocational Rehabilitation Service Program	Engaged in seasonal or temporary agricultural work	May be eligible whether employment is within commuting distance, or requires temporary residency near work site.	16-65	
Migrant Health Centers Program	Principal employment is on an agricultural or seasonal basis	May be eligible whether employment is within commuting distance or requires temporary residency near work site.	All ages	
Migrant Legal Action Program	Person works in temporary seasonal employment in agriculture, fishing or related food processing work	Work requires travel from one district to another	All ages	
Migrant Head Start Program	Family wage earners are in agricultural work	Family wage earners migrate within a 12 month period for agricultural work	Birth through 5 years	
Migrant and Seasonal Farmworker Program	Seasonal farmworker who performs or has performed agricultural work 12 consecutive months in the last 24 months preceding applications	Work requires travel and inability to return to domicile within same day	Will serve all ages above the State regulated working age	

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Table 4

## Eligibility Criteria for Program Participation (Cont.)

Program	Employment	Mobility	Ages(s) Served	Other Criteria
Employment Standards Administration	Employed in agricultural work of a seasonal or temporary basis	May be eligible whether work is within commuting distance or requires temporary residency near work site	All ages	
Employment Services	Seasonal or agricultural work		All ages above the State regulated working age	
Occupational Safety and Health Administration(OSHA)			All ages	Lives in temporary labor housing
Food Distribution Program			All ages	Low income level and if eligible for other family assistance programs
Food Stamp Program		Those persons who for purposes of finding work must be away from home over night or longer	All ages	Low income level

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Table 4

## Eligibility Criteria for Program Participation (Cont.)

Program	Employment	Mobility	Ages(s) Served	Other Criteria
Pesticide Farm Safety Program	Seasonal or agricultural workers		All ages	
Community Health Centers Program	Principal employment is on an agricultural or seasonal basis	May be eligible whether employment is within commuting distance or requires temporary residency near work site	All ages	Resides in medically underserved area
3-17 Women, Infants, and Children (WIC) Program	Principal employment is on an agricultural or a seasonal basis	May be eligible whether employ- ment is within commuting distance or requires temporary residence near work site	Pregnant, postpartum, breastfeeding women, and infants and children up to age 5	Nutritionally disad- vantaged low income

The following six programs require that a worker travel for purposes of employment:

- College Assistance Migrant Program
- High School Equivalency Program
- Migrant Legal Action Program
- Migrant Head Start Program
- Migrant and Seasonal Farmworker Program
- Food Stamp Program

Four of the above programs not only require that farmworkers are mobile, but also specifically state that the travel to work must preclude them from returning to their permanent residency within the same day. These programs are:

- College Assistance Migrant Program
- High School Equivalency Program
- Migrant Seasonal Farmworker Program
- Food Stamp Program

Six of the programs will allow participation whether the farmer is in commuting distance of the agricultural work or if it is necessary to establish a temporary residency near the work site. These six programs are:

- Handicapped Migratory Agricultural and Seasonal Farmworker Vocational Rehabilitation Service Program
- Migrant Health Centers Program
- Community Health Centers Program
- Women, Infants and Children Program
- Employment Standards Administration
- State Migrant Education Program

The State Migrant Education Program considers a child migratory for up to an additional five years after their parent or guardian has ceased to migrate.

The Food Stamp Program has a monthly reporting system where many households must submit a statement of their income each month to their local food stamp office. Under retrospective budgeting, once a household has been certified for food stamps, benefits are calculated on the basis of a family's financial circumstances during a previous month. Migrant farmworkers are by law exempt from this requirement. Instead, migrants have their eligibility and level of benefits calculated for the month of application by considering only income which is received between the first of the month and the date of application. Additionally, various other special considerations are applicable to migrant farmworkers, such as:

- The Food Stamp Program can expedite services - applicants can be eligible for coupons in five days, which is especially good for migrants because they move so quickly.
- Migrants may also apply for stamps under destitute provisions which means they have little or no income at the time of application.



- Vehicles used for long distance travel for migrants are not counted - the amount of money in stamps provided is usually based in part on if a person owns a vehicle.
- If migrants left their permanent home because of employment, they may claim expenses for the shelter they left and the one they currently have, which can increase the amount of food stamps they may receive.

By taking into account the mobility and the fluctuating nature of income which accompanies employment for migrant farmworkers, the Food Stamp Program is able to provide more efficient services for this population.

As indicated in Exhibit C, of the 16 programs, 9 will provide services to eligible persons of any age. All four of the identified health service programs fall under this category. Of the three programs identified as having a nutritional service objective, only the WIC program has age restrictions. Although CAMP has no formal age requirement, participants in this program would logically be at or above the average age of 17 when a person would graduate from high school. Finally, although the Employment Standards Administration also has no restriction on age, it again would be logical that their enforcement services would affect a concentration of persons in the age range of approximately 16-65, the same working age group that is the focus of vocational rehabilitation.

The WIC Program provides nutritional assistance to those women who are pregnant, postpartem or breastfeeding as well as infants and children up to the age of five years. Similarly, the Migrant Head Start Program provides assistance to children from birth through five years.

The State Migrant Education Program is funded for children ages 5 to 17; however, allowances are made for preschoolers as well as for those students who are between the ages of 17 and 21, provided the student does not have a high school diploma. The CAMP program does not have an age ceiling; however, the participant must have a high school diploma or equivalent and be enrolled or admitted as a full-time student at a participating institute of higher education and not have completed the first academic year of study. The HEP program will serve any participant who is not currently enrolled in an elementary or secondary school who is above the compulsory school age of 16 years. Through these programs, the Department of Education offers educational opportunities to migrants of all ages. Although there are age restrictions, a migrant of any age or educational level may obtain services under one of these programs.

The programs administered through the Department of Labor are divided between providing employment placement services and standards enforcement. The two programs which provide employment placement services, the Migrant and Seasonal Farmworker Program and Employment Services, will provide assistance to those persons who are above the State regulated working ages. The two enforcement agencies, OSHA and the Employment Standards Administration, provide enforcement services regardless of age.

### 3.1.3 Numbers Served, Geographical Locations and Seasonal Variations

There are many inconsistencies in the migrant demographic data in general. The many factors involved in attempting to collect and report data on the agricultural farmworker population result in inaccuracies which contribute to these inconsistencies. After analyzing these different estimates of the migrant population, the inconsistencies may be attributed to the fact that various programs do not actually count the number of migrants per se, but are, in fact, counting the number of migrants who potentially could receive services under their programs. Therefore, the estimates of the migrant population would be based on program eligibility requirements unique to each program. The following are examples of programs that provide various estimates of the migrant population which may actually be estimates of the eligible population:

- In a 1981 GAO Report entitled Problems in the Structure and Management of the Migrant Health Program, estimates were reported of 800,000 migrant workers and about 1.9 million seasonal farmworkers (both numbers include their families).
- In a 1981 report by H. Mankiewicz, Hunger and Malnutrition Among Migrant/Seasonal Farmworkers in the United States, "estimates range from 1.5 to 6 million people."
- A program official with the Migrant Health Center Program estimated that there are "2 million seasonal farmworkers and 700,000 domestic migrants. However, due to an unknown number of illegal alien migrants there could be close to 2 million migrants total."
- The Migrant Head Start Program interviewee stated that "we reach approximately 18,000 kids in 33 States, but that only constitutes about 6 or 7 percent of those who are eligible for services under our program."

- The EPA estimates that there are "hundreds of thousands of migratory and seasonal workers" and "every year farm populations numbering almost 4 million (2.7 million farmer families and 1.2 million hired workers)" are exposed directly or indirectly to pesticides and their residues.

The difficulties in identifying, recruiting and tracking such a highly mobile and changing labor force also present problems in attempting to count this population. The Bureau of the Census, as a statistical agency, collects a wide variety of data concerning the people and economy of this country which are used to develop and evaluate economic and social programs. As part of our research, the Bureau of the Census was contacted. The official we spoke with made the following comment:

"We don't count migrants - we would end up counting them over and over again as they move. We can tell you about migration patterns associated with regular moving but we don't count migrant workers".

Another barrier to accurately counting the number of migrant and seasonal farmworkers is that "changes in farmwork itself which may cause massive alterations in the farm labor force, and in the case of migrants, the streams they follow around the country" (Interamerica, 1980:10).

Because of the mobility of a portion of the migrant population, geographic and seasonal variations in the number of migrant workers influence the demands on local programs. In addition to the inherent difficulties in collecting accurate demographic data on migrants, these changes in the economy introduce barriers to collecting accurate data.

The streams which migrants have historically followed are shown in Exhibit D (GAO/HRD-83-40:4). The classic migration streams are:

- The Western Stream which includes California, Washington, Oregon, and the Rocky Mountain states
- The Midwestern Stream which originates in Mexico and Texas and extends northward into Illinois, Wisconsin, and Michigan
- The Eastern Stream which extends from Florida northward along the eastern coast

These streams which migrants follow in pursuit of agricultural work, originate in three home base States:

- California
- Texas
- Florida

Home base States are where migrant farmworkers reside when they are not working, which is typically during the winter months. In the home base areas, migrants are usually of the same ethnic or racial group as their neighbors who do not migrate in search of work (GAO/HRD-81-02:1981). Additionally, these home base States were repeatedly cited by the program officials as areas with high concentrations of migrants (see Table 5) and where many projects which provide services to this population are located. Several other "stream" States were identified as areas with large numbers of migrants. The following list includes some of these stream states:

- Illinois
- Washington

Exhibit D  
Migration Routes of Migrant Farmworkers

THE MAJOR MIGRANT STREAMS

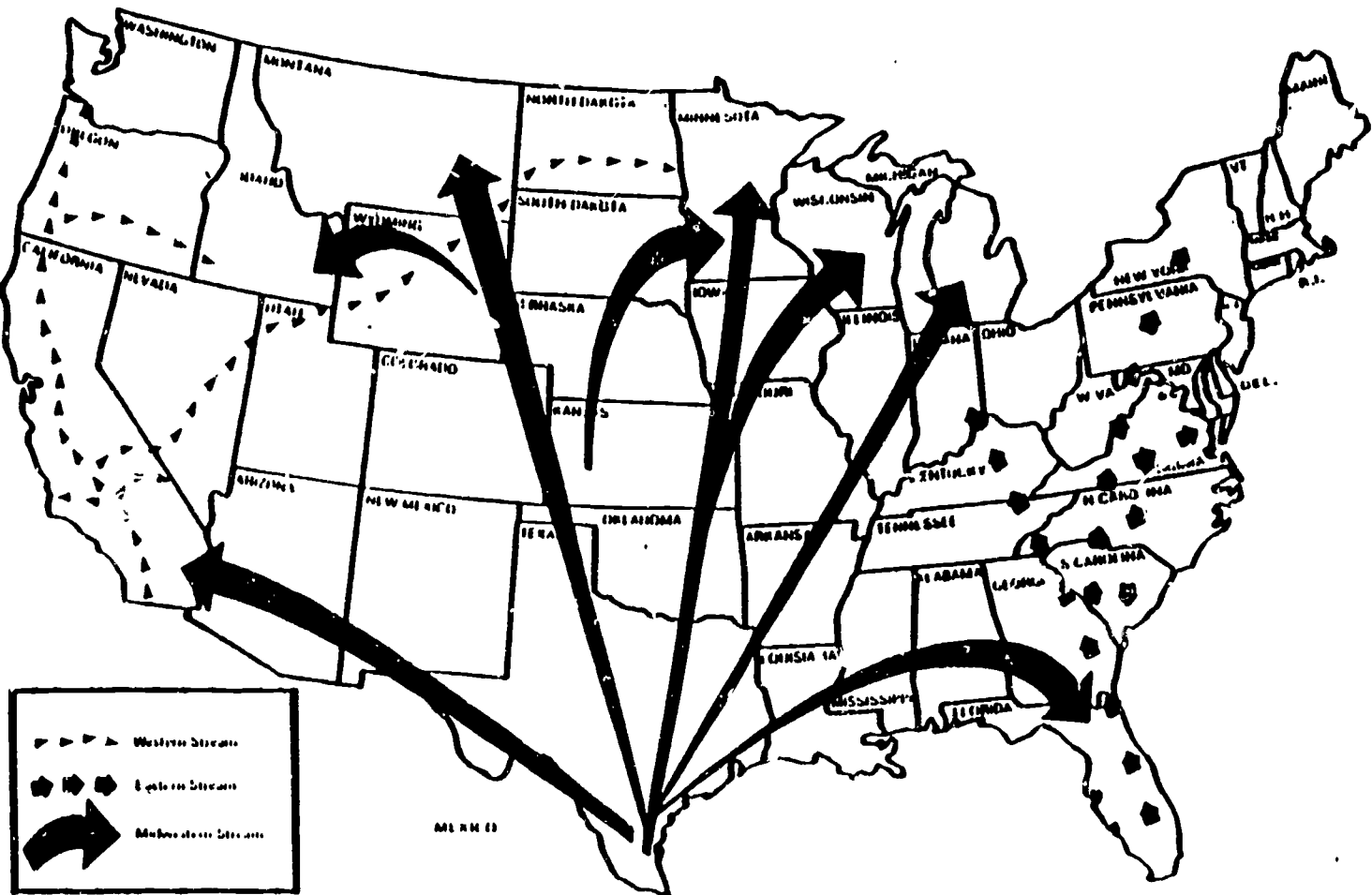


Table 5

**Geographical Locations  
with Concentrations of Migrants**

Program	States with Concentrations of Migrants or Locations of Grantees
State Migrant Education Program	Currently Migrant: FL, TX, CA, WA, MI Formerly Migrant: MA, NY, NC, LA, AZ, ID Fishers are located in Alaska
High School Equivalency Program (HEP)	Grantees are located in 14 states: CA, CO, ID, ME, MD, MA, MS, NM, OR, PR, TN, TX, WA, WI.
College Assistance Migrant Program (CAMP)	Grantees are located in 6 states: AZ, CA, ID, MD, TN, TX
Handicapped Migratory Agricultural and Seasonal Farmworker Vocational Rehabili- tation Service Program	Grantees are located in 10 states: NY, VA, IL, WI, TX, CO, UT, CA, ID, WA
Migrant Health Centers Program	Grantees are located in 36 states: AZ, CA, CO, DE, FL, ID, IL, IN, IO, KN, MD, MA, MI, MN, MO, MT, NB, NJ, NM, NY, NC, ND, OH, OK, OR, PA, PR, SC, TN, TX, UT, VA, WA, WV, WI, WY

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Table 5

Geographical Locations  
with Concentrations of Migrants (Cont.)

Program	States with Concentrations of Migrants or Locations of Grantees
Migrant Legal Action Program	States with high concentrations are CA, FL, and TX. All stream states will also have large numbers, e.g. SC, NC, AL, VA, MD, OH, WI, MI, WA
Migrant Head Start Program	Grantees are located in 15 states: AZ, AK, CA, CO, ID, IL, MI, MN, NM, OR, TN, TX, UT, VA, WA
Migrant and Seasonal Farmworker Program	Concentrations of migrants are in CA, FL, TX. Projects are located in 49 states
Employment Standards Administration	No information available
Employment Services	Grantees which serve migrants are located in 48 states, however "significant states" which serve large numbers of migrants are NY, NJ, PA, VA, FL, GA, NC, SC, IL, MI, MN, OH, NM, TX, CO, AZ, CA, ID, OR, WA
Occupational Safety and Health Administration (OSHA)	There is a list of migrants camps used by OSHA, however this list may be accessed on the Information Management System (IMS) and the system is not yet fully operational
Food Distribution Program	Program available in 50 states, D.C., Puerto Rico, Virgin Islands, American Samoa, and Guam

3-27



Table 5

Geographical Locations  
with Concentrations of Migrants (Cont.)

Program	States with Concentrations of Migrants or Locations of Grantees
Food Stamp Program	The states with more populated areas with higher poverty levels will have higher numbers of participants (no other geographical data available)
Peatitudes Farm Safety Program	States with high concentrations of farmworkers include FL, TX, CA, NJ, OR, WA, MI.
Community Health Center Program	No information provided
Women, Infants and Children (WIC) Program	Grantees are located in 37 states: AL, AZ, CA, CO, DE, FL, GA, ID, IL, IN, IA, KA, LA, MD, MI, MN, MS, MT, NB, NJ, NM, NY, NC, ND, OH, OR, PA, SC, SD, TN, TX, UT, VA, WA, WV, WI, WY (projects which serve large numbers of migrants are CA, CO, FL, ID, IL, IN, KA, MI, MN, NB, NY, NC, ND, OH, OR, TX, VA, WA, WV, WY)

3-28

- Michigan
- Massachusetts
- Idaho
- North Carolina
- South Carolina
- Wyoming
- Colorado

However, as one respondent stated: "There are migrants virtually in every State."

Uncertainties that are encountered in the agricultural sector affect the patterns of migrating farmworkers or may necessitate a seasonal or settled-out farmworker to travel for pursuit of employment. Because weather conditions are unpredictable, the migrant streams may vary from one year to the next and weather trends such as droughts may affect migration patterns for years (Interamerica, 1980).

In addition to the influences of weather on migration, structural changes in the agricultural economy are altering migrant mobility. "Advanced agricultural technologies and competition for available work have altered traditional migratory patterns in recent years" (GAO/HRD-83-40:3). In many States the advanced agricultural industry has resulted in more demand, service and attention for the migrant labor force and consequently has induced many migrants to stay year-round and settle-out rather than migrate.

There is a great deal of variation in the numbers served under each of the 16 programs. This variation may be attributed to the following factors:

- Differing eligibility criteria for program participation such as mobility
- Differing definitions of the target population, for example some programs target only specific age groups
- Funding levels vary among the programs specifically for migrants from \$450,000 to \$264.5 million

One or several of these factors can influence the number of migrants served in each program. Additionally the outreach efforts implemented by individual programs potentially affect the numbers served as well. Because of these factors, valid comparisons of numbers served across the programs cannot be made.

From our analysis of the numbers served, we conclude that inconsistency in program data stems from the varying definitions of the migrant or seasonal farmworker population as noted in Section 3.1.1. Without a common definition of who constitutes the population to be counted, numbers collected by various federal agencies may or may not account for the same population.

## 3.2 Outreach Efforts

Outreach activities - identification and recruiting - are a crucial factor in the ultimate success of any program that focuses its services exclusively on the migrant population. The population's mobility and needs make outreach a constant effort for many programs.

At the early stages of this study, program identification and recruiting procedures were identified as key components of the study and were to be researched and analyzed separately. However, having completed the interviews and documentation analysis, it is evident that in practice there is little, if any difference between identification and recruiting procedures. These functions are integrated in most programs surveyed. Consequently, these mechanisms will be discussed under the broader category of Identification Procedures for Recruiting.

### 3.2.1 Identification Procedures for Recruiting

Most programs surveyed employ procedures to identify and recruit program participants, although one is forbidden by law from recruiting. Outreach procedures range from sending trained program staff into labor camps and door-to-door, to inter- and intra-agency referrals. Some programs use several procedures. One program relies mainly on word-of-mouth.

The most frequently cited method for outreach purposes (as shown in Exhibit E and Table 6) was site visits to labor and/or housing camps. Of the 16 identified programs, 9 use this form of outreach. Outreach in these programs typically involves visits to camps by local staff who are trained specifically for identification and recruitment activities and often share a common language and culture with the migrant population served.

Five of the programs mentioned above not only make visits to the labor and/or housing camps, some also will speak with the crew leaders or growers for outreach purposes. The Migrant Head Start Program, Migrant Health Centers Program, OSHA, Employment Services, and Employment Standards Administration use this approach. Perceptions regarding the responses of the crew leaders and growers to these outreach techniques vary. The Migrant Head Start Program staff members are not only accepted by the crew leaders and growers, they are welcomed. This positive reaction to Head Start program members may be because the program offers the migrant parents relief from day care responsibilities, which in turn benefits the employers (i.e., the growers and crew leaders). However, the Migrant Health Centers Program staff members are met with a very different attitude from the crew leaders and growers. The staff members are not welcome in labor or housing camps because the growers and crew leaders are fearful of any type of interference from officials that have an enforcement objective. The Migrant Health Program is apparently perceived to be an interfering program similar to OSHA and unions.

Exhibit E  
IDENTIFICATION AND RECRUITING METHODS

Program	Site Visits		Talk to Growers/ Crew Leaders	Referrals		Adver- tisements	Word- of- Mouth	Varies at Local Level	Not Allowed
	Labor Camps	Housing Camps		Other Organi- zations	Inter- Intra- Agency				
State Migrant Education	X	X							
College Assistance Migrant				X					
High School Equivalency				X	X				
Handicapped M'g. Agric/Seas Farmworker Voc. Rehab.								X	
Migrant Health Centers	X	X	X						
Migrant Legal Action		X							
Migrant Head Start	X	X	X						
Migrant and Seasonal Farmworker	X	X							
Employment Standards Admin.	X	X	X			X			
Employment Services	X	X	X			X			
Occupational Safety and Health Admin.	X	X	X			X			
Food Distribution								X	
Food Stamp									X
Pesticides Farm Safety					X				
Community Health Centers								X	
Women, Infants and Children	X	X				X			

3-33

Table 6

## Identification Procedures for Recruiting

Program	Procedures	Reported Number Served Annually
High School Equivalency Program (HEP)	At the local level, institutions of higher education make contacts with high schools, the Department of Labor, and health agencies for students to be recommended for participation in HEP program.	2,800
College Assistance Migrant Program (CAMP)	Students are identified and recruited for participation in this program from local high schools by local CAMP staff members.	565
State Migrant Education Program	Teacher aides are trained to visit migrant housing/labor camps or visit fields where migrants work for identification and recruiting purposes.	593,000
Handicapped Migratory Agricultural and Seasonal Farmworker Vocational Rehabilitation Service Program	Identification and recruiting of program participants accomplished by the State Vocational Rehabilitation Project staff.	3,000
Migrant Head Start Program	Staff members with local grantees make site visits to schools, camps, and service agencies who also deal with migrants (e.g., day cares). Also talk to growers who employ migrants.	18,000
Migrant Health Centers Program	Staff members with grantees make site visits to housing/labor camps and will also talk to growers who employ migrants.	450,000

3-34

Table 6

## Identification Procedures For Recruiting (Cont.)

Program	Procedures	Reported Number Served Annually
Migrant Legal Action Program	Paralegals are trained to visit housing camps - they do not visit actual work sites (fields) - and will present programs to educate migrants about their legal rights.	N/A
Migrant and Seasonal Farmworker Program	Grantees establish recruiting centers and staff members visit labor/housing camps to identify and recruit. They also print articles in the newspapers or visit State Employment Services to publicize the program and services.	16,000
OSHA.	In a tri-agency agreement with Employment Standards and Employment and Training Administrations, OSHA obtains employees and employers names when they register for certification. OSHA also maintains an on-going list of labor and housing camps for site inspections.	N/A
Employment Services	State Employment Office staff members visit working and living areas.	116,135
Employment Standards Administration	Officials make site visits to ensure MSPA regulations are posted in working areas to ensure migrants are aware of their rights and where to seek help if their rights are violated. Officials also check for proper certification of registration for all employers and employees, and do post-occupancy housing inspections.	<p>In FY 1984 there were:</p> <ul style="list-style-type: none"> <li>● 12,500 registrants (including 9,400 farm labor contractors and 3,100 farm labor contractor employees) who employed approximately 375,000 crew members</li> </ul>

3-35



## Identification Procedures For Recruiting (Cont.)

Program	Procedures	Reported Number Served Annually
		<ul style="list-style-type: none"> <li>● 5,273 MSPA compliance actions</li> <li>● 190 revocations, refusals to issue and refusals to renew farm labor contractor certificates of registration</li> <li>● 164 farm labor contractors cited for employing 1,398 illegal alien workers</li> </ul>
Pesticide Farm Safety Program	EPA staff members work with community programs that deal with farmworkers and are more successful in educating farmworkers on pesticide hazards than if they did outreach by themselves.	N/A
Food Distribution Program	Food Banks at the local levels do outreach - identification procedures for recruiting would be unique to each area.	Over 2.5 billion pounds of food were distributed in 1983
WIC Program	WIC staff are located in health departments and identify and recruit migrants at these centers. Program staff members and volunteers visit migrant camps and posters, newspaper articles, flyers and pamphlets are distributed to publicize program and services.	Between June and October of 1984, 238,592 migrants were served (cumulative total for 1983 was 293,870)

Table 6

## Identification Procedures For Recruiting (Cont.)

Program	Procedures	Reported Number Served Annually
Food Stamp Program	Identification for recruiting of participants is prohibited. However, the program is so widely known, recruiting is unnecessary.	21 million per month
Community Health Centers Program	After a Center is established in a medically underserved area, program participants are referred to the Center by word-of-mouth.	300,000 (total migrants)

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111

The Migrant Legal Action Program trains the paralegals in the field offices to visit housing camps to educate the migrants concerning their legal rights. However, they visit the housing camps but not the work sites. Unless the attorneys or paralegals have a direct invitation by a client (migrant) they will not go to the field. The practice of not visiting the labor sites stems from the attitude that such visits are unfair to the employer. The Migrant Legal Action Program sees itself as an enforcement agency (much like OSHA), but differs in that it takes the position of not interfering with the daily operations at the work site.

It is evident that the usefulness of talking to growers and crew leaders for outreach purposes varies and is based on the basic thrust of the program. It appears that if the services provided by a program are beneficial to the migrants as well as their employers, then program staff members are welcomed into the labor and housing camps and receive cooperation from the crew leaders and growers. If on the other hand, the services offered by a program are more of an enforcement nature and will only prove advantageous to the migrants and appear threatening to employers, then program staff members are viewed by crew leaders and growers as an interfering body. The amount of cooperation received by the other programs who also employ this type of outreach technique would also vary. This hypothesis could not be validated within the scope of this study because interviews were conducted only at the federal level. The program staff members at the local level who are involved directly with outreach could offer explanations as to why attitudes vary towards different programs.

Several programs also cited other agencies or organizations as contacts for outreach efforts. The Pesticide Farm Safety Program works with community programs which deal with migrants on a regular basis. This has been found to be more successful than when program officials attempt to contact migrants directly.

The Occupational Safety and Health Administration not only relies on a previously identified list of labor and housing camps for inspection purposes, but has a tri-agency agreement with the Employment and Training and Employment Standards Administrations (within the Department of Labor) for referrals. OSHA inspects the housing while occupied, Employment and Training performs pre-occupancy housing inspections, and Employment Standards performs post-occupancy inspections and all work jointly as a network of referrals. The Employment Standards officials also obtain employers and employees names when applying for certificates of registration and refer these names to OSHA. This tri-agency referral system is an effective means of outreach for the Department of Labor because the three programs cover all stages of housing inspections and are also able to check adherence to various labor regulations at the same time.

In an effort to identify and recruit students for participation in the High School Equivalency Program, institutions of higher education at the local level make contacts with area high schools, the Department of Labor, and health agencies to obtain names of students as potential participants in the HEP program. Similarly, potential participants are recruited for participation in the College Assistance Migrant Program by contacting local high schools for student referrals.

The Women, Infants and Children Programs are located in health departments across the country. When individuals arrive for health care they are also, if they meet the eligibility criteria, identified and recruited by WIC staff members for participation in the WIC program. WIC officials also distribute posters, newspaper articles, flyers and pamphlets, as well as visit labor and housing camps in an effort to publicize their program and the services which are available.

The Community Health Centers Program relies heavily on "word of mouth" as stated by one program official. These health centers are located in areas where there are shortages of health care personnel. Once there is a demonstrated need for a Community Health Center, a needs assessment is conducted based on:

- Percentage of the population considered at the poverty level
- Percentage of the population over the age of 65 years
- A high infant mortality rate
- The ratio of doctors to residents

Once there is clearly an identified need and an area is designated medically underserved, a Community Health Center is established, and recruiting is accomplished by referrals through service recipients.

The Food Stamp Program is unique compared with other programs in that it is not allowed by law to identify potential food stamp recipients. However, as one respondent noted: "We are so widely known that we do not have to recruit."

### 3.2.2 Tracking Procedures

Subsequent to successful identification and recruiting, special categorical services may be provided to the migrants and their families. However, the only manner in which a migrant can receive services on a continuous basis is if the programs which offer assistance know where the migrant will be traveling to. Tracking such a highly mobile and often times invisible group is not only complicated, but largely unsuccessful. The unpredictable path of migration serves as a barrier to linking services for migrants on an on-going basis. In spite of the difficulties, however, some programs do have some form of tracking system.

From our analysis, tracking procedures for the 16 programs may be categorized in the following 4 basic areas (see Table 7):

- Unable to track, but making an attempt (2 programs)
- No attempt made to track because it is not a program objective (6 programs)
- Tracking consists of referring a person to a project in the area they are traveling to (6 programs)
- Tracking is (or may be) done at the State or local level but not at the Federal level (3 programs)

As indicated in Exhibit F, the most common response to questions concerning tracking procedures was that there were no attempts made to track service recipients. Of the six programs which make no effort to track program participants, five are programs which do not specifically serve the migrant population (i.e., migrants may receive services but are

Exhibit F  
TRACKING PROCEDURES

Program	Attempts To Track	No Attempt - Not Program Objective	Referral System	Done At State/Local Level
State Migrant Education	X	.		
College Assistance Migrant		X		
High School Equivalency				X
Handicapped Mig. Agric/Seas. Farmworker Voc. Rehab.				X
Migrant Health Center			X	
Migrant Legal Action			X	
Migrant Head Start				X
Migrant and Seasonal Farmworker			X	
Employment Standards Admin.		X		
Employment Services			X	
Occupational Safety and Health Admin.		X		
Food Distribution			X	
Food Stamp		X		
Pesticide Farm Safety		X		
Community Health Centers		X		
Women, Infants and Children			X	

Table 7

## Tracking Procedures

Program	Tracking Procedures
State Migrant Education Program	"Unable to do tracking - no idea where they'll go or just where they've been." - Interviewee
College Assistance Migrant Program (CAMP)	This program provides support for the first year in college and regular counseling sessions with students are mandatory to track progress. Once the first year is completed the institution of higher education commits itself thereafter.
High School Equivalency Program (HEP)	There is no attempt to track at the federal level, however some institutes do their own form of tracking.
Handicapped Migratory Agricultural and Seasonal Farmworker Vocational Rehabilitation Service Program	Each state implements its own tracking system. However, it was recommended in the 1985 Program Review that the State of Virginia's tracking system be assessed for utilization by other state projects. An RSA MAW ( Migrant Agricultural Worker) Grant Program was initiated in 1979 with the MSRTS. As the disabled migrant moves from state to state MAW can contact the rehabilitation agency and that agency can contact MSRTS via a WATTS line and obtain data.
Migrant Health Centers Program	There is no attempt to track, however clinics have a Migrant Health Referral Directory which lists all clinics where migrants may receive services, and program officials will refer migrants to the clinic in the area they are migrating to.
Migrant Legal Action Program	"There is no effort to track in the literal sense - nothing formal. Legal programs in streams coordinate their activities to try to provide continuous services." - Interviewee

3-43



Table 7

## Tracking Procedures

Program	Tracking Procedures
Migrant Head Start Program	The program officials use information contained in MSRTS and also have a highly coordinated system between grantees who transfer information for continuity of services (not a computerized system).
Migrant and Seasonal Farmworker Program	It is not necessary to track because once a person enrolls in the program they stay for training and placement in a permanent job. However, if a person is relocating to an area where there is an existing project, staff members will contact the next grantee to assist and continue services.
Employment Standards Administration	There is no attempt to track, however a network of labor exchange exists among state agencies that matches migrants to available work.
Employment Services	There is no attempt to track.
Occupational Safety and Health Administration (OSHA)	The only form of tracking is follow-up inspections with employers who were not in compliance with OSHA regulations.
Food Distribution Program	Although there is no actual tracking, local levels will inform persons of where they may receive services when they relocate.
Food Stamp Program	There is no attempt to track.
Pesticides Farm Safety Program	There is no attempt to track.

3-44

Table 7

## Tracking Procedures

Program	Tracking Procedures
- Community Health Centers Program	There is no attempt to track outside of the service area. Within service areas, patients will be contacted if they do not come in for follow-up treatment.
- Women, Infants and Children (WIC) Program	Although they do not actually track migrants, Verification of Certification (VOC) cards are issued to each participating migrant which have helped migrants continue participating in the program even when they change location. The VOC card is accepted as proof of eligibility for program benefits. Additionally, participants receive a directory with locations of other WIC facilities.

part of a larger target population). These programs do not include tracking those persons who receive services as an objective of their program. The Community Health Centers Program does not attempt to track patients - however, if the patient remains in the immediate service area of the clinic where services were received, there will be attempts made to contact the patients for follow-up care. Similarly, OSHA performs follow-up investigations when a safety or health regulation has been violated. OSHA staff officials will return to a housing camp to re-inspect and ensure compliance with regulations.

As observed by the College Assistance Migrant Program interviewee, tracking really is not necessary in this program. The program objectives and eligibility criteria negate the need to track. CAMP provides support for the first year in college and regular counseling sessions with students are mandatory to track the student's progress. After the first academic year is completed, the institution takes responsibility for assisting students in successfully finishing their academic career. Therefore tracking by CAMP would be unnecessary because the student would either have dropped out of the program due to academic failure or would voluntarily terminate participation in the program.

Six of the programs do not have a procedure for tracking. However, referrals are provided by program staff members for migrants to receive services in the areas they may be traveling to if a project exists in that location. The six programs that will refer participants for services in other locations are the Migrant Legal Action Program,

Migrant Health Centers Program, Migrant and Seasonal Farmworker Program, Employment Services, Food Distribution Program, and WIC Program.

The Seasonal Farmworker Program finds that it is not necessary to track for reasons similar to CAMA. Once an applicant enrolls in the program they stay for training and placement in a permanent job. However, if a program participant is relocating to an area where there is an existing project, staff members will contact the next grantee to assist the applicant and continue services.

In the Migrant Legal Action Program there is no effort to formally track. Legal programs in streams coordinate their services in an effort to provide continuity of services. They will refer the migrant clients to another project in the State to which they are moving.

The local agencies involved in the Food Distribution Program inform migrants of where they may receive services when they move, however, there is no actual tracking. Employment Services provides assistance to migrant and seasonal farmworkers which are related to both agricultural and non-agricultural work. The State employment agencies coordinate their efforts in placing migrants in jobs through a network of labor exchange. Through the network, migrants are matched with work that is available and are referred for employment.

Both the WIC Program and the Migrant Health Centers Program provide referrals to migrants, but in a slightly different manner than the other three programs. These two programs actually provide the migrant with a

directory of locations where other projects under each program may be found. The Migrant Health Centers Program prints the Migrant Health Referral Directory which not only lists all of the clinics where migrants may receive health care, but also includes maps for each State and the time period when each clinic is operating. Similarly, WIC staff members will also supply their program participants with copies of a directory which lists the locations of other WIC facilities. Additionally, WIC participants are issued Verification of Certification (VOC) cards which are accepted as proof of eligibility for program benefits. These help the migrant participants continue services when they change locations. These two programs appear to approach the problem from the position that attempting to track migrants as they move from area to area is futile. They have implemented an alternative approach through referral directories in an effort to assist the migrants in receiving continuous health care and nutritional assistance. The responsibility for continuity rests on the program participant rather than the program administrators.

There are three programs which are not tracked at the federal level, but some of the State/local level grantees do tracking. The Migrant Head Start Program is reported to have a highly coordinated system among the grantees. Although this system is not computerized, grantees transfer participant information to each other in an effort to provide services on a continuous basis. It is important to note, however, that coordination of efforts in this program may not be as complicated and costly a task as for the State Migrant Education Program. MEP funds 51 grantees which serve approximately 593,000 migrant children. The Migrant Head Start

Program funds 33 grantees which serve 18,000 migrant children. Obviously, coordinating information among 51 grantees concerning 523,000 participants is a more arduous process than one involving 33 grantees with 18,000 children to track.

HEP program participants are not tracked at the federal level; however, some of the local institutions do track the students who participate in this program. Finally, the State grantees in the Handicapped Migratory Agricultural and Seasonal Farmworker Vocational Rehabilitation Service Program each implement their own intra- and interstate tracking system. In the March 1985 program review, it was suggested that an assessment be made of the current tracking system used by Virginia under this program. This tracking mechanism has been quite successful and should be reviewed to determine whether it could be used by other States serving the migrant population.

Two programs are designed to halt migration - the Seasonal Farmworker Program and CAMP. Under the Seasonal Farmworker Program, after an applicant enrolls in the program to receive employment assistance, the objective of the program is to train the applicant and to subsequently place that applicant in a permanent job. Similarly, once a student is participating in CAMP, the program mandates counseling of the student's progress by program staff. Because a student is attending an institute of higher education and his/her academic progress is monitored so closely, such a situation would preclude mobility for the student. The efforts of both programs are channelled towards assisting the participant in achieving a non-migratory lifestyle.

Through the Migrant Student Record Transfer System (MSRTS), the Migrant Education Program attempts to track the educational progress of migrant children. This tracking system places emphasis on where the migrant child has been versus the referral system which focuses on where the migrant will relocate. Information on children enrolled on the MSRTS is historical in nature, i.e., past educational and health data are contained in the system on individual children, as well as the school districts in which these children have been enrolled. There are several problems associated with the MSRTS and its operation. These difficulties, as noted in the RTI study and the 1976 GAO evaluation of the MSRTS, include:

- Incorrect data entered in the system
- Insufficient use of the system in general
- Data are not kept up-to-date
- Data on newly identified migrant children are not always entered
- Duplication of data

These are a few of the problems encountered in the operation of this tracking system which are due to the magnitude of the operation and numerous variables involved. However, there are other difficulties with the population the MEP officials are trying to track through this system. One problem is that migrants may travel to an area where there is no migrant education project available for their children. These projects are concentrated in rural areas, therefore cities to which migrants move may not have the services available. In this case, the migrants become invisible and their progress cannot be followed. Another

difficulty is that MEP officials have no idea where the migrants will travel to once they have left a migrant project area.

Although an objective behind the MSRTS is compiling historical data on migrant children enrolled in the system, educational services to migrant children could potentially be provided on a more continuous basis if a referral system was implemented similar to the one used by the WIC and Migrant Health Programs. Although use of such a referral system may not prove useful in maintenance of data entered in the MSRTS, it would provide information to parents where migrant education projects are located and assist in retaining children in this program.



### 3.3 Coordination Efforts

This section discusses the efforts made by federal programs to coordinate delivery of their services. Federal program manager's assessments of the extent of duplication of services across programs are discussed as well.

#### Coordination

Migrants are served by numerous programs designed to meet a wide range of needs. Each of these categorical programs meets at least one of several needs. During interviews with program officials in each of the 16 identified programs, they were asked questions concerning efforts to coordinate their program services with those of other programs. Additionally, each official was asked if they were aware of any duplication of services they provide or in the populations served.

Of the 16 programs identified, 14 of the program officials indicated there are agencies with which they coordinate their program services (see Table 8). (The two programs which do not coordinate their efforts with any others are the Migrant Legal Action Program and the Food Distribution Program.) Although the majority of program officials did report some coordination, several of them indicated they believe further coordination is needed. What they want to accomplish through coordination and what they do to coordinate varies. Purposes of coordination ranged from meetings of federal staff members "to learn about each other" to efforts to influence another program's regulations and the way in which services are delivered.

Table 8

## Coordination Efforts

Program	Programs Which Services Are Coordinated With
High School Equivalency Program (HEP)	<ul style="list-style-type: none"> <li>● Migrant Health Centers Program</li> <li>● Department of Labor (JTPA)</li> <li>● State Migrant Education Program</li> </ul>
College Assistance Migrant Program (CAMP)	<ul style="list-style-type: none"> <li>● Migrant Health Centers Program</li> <li>● Department of Labor (JTPA)</li> <li>● State Migrant Education Program</li> </ul>
State Migrant Education Program	<ul style="list-style-type: none"> <li>● State Chapter 1 Program (regular and bilingual)</li> <li>● Vocational Rehabilitation Program</li> <li>● Migrant Health Centers Program</li> <li>● Department of Labor (JTPA)</li> </ul>
Handicapped Migratory Agricultural and Seasonal Farmworker Vocational Rehabilitation Service Program	<ul style="list-style-type: none"> <li>● Department of Health and Human Services (Migrant Health)</li> <li>● State Migrant Education Program</li> <li>● Department of Labor (Migrant and Seasonal Farmworker Program)</li> </ul>
Migrant Head Start Program	<ul style="list-style-type: none"> <li>● State Migrant Education Program</li> <li>● Migrant Health Center Program</li> <li>● Department of Agriculture</li> <li>● Environmental Protection Agency</li> <li>● Department of Labor (training)</li> <li>● State Department of Social Services</li> </ul>

## Coordination Efforts (Cont.)

Program	Programs Which Services Are Coordinated With
Migrant Health Centers Program	<ul style="list-style-type: none"> <li>● State Migrant Education Program</li> <li>● Migrant Head Start Program</li> <li>● Environmental Protection Agency</li> <li>● Community Health Centers Program</li> </ul>
Migrant Legal Action Program	N/A
Migrant and Seasonal Farmworker Program	<ul style="list-style-type: none"> <li>● Department of Agriculture</li> <li>● Migrant Health Centers Program</li> <li>● Department of Labor (OSHA)</li> </ul>
Occupational Safety and Health Administration (OSHA)	<ul style="list-style-type: none"> <li>● Department of Labor's Employment Standards Administration</li> <li>● Department of Labor's Employment and Training Administration</li> </ul>
Employment Services	<ul style="list-style-type: none"> <li>● Department of Labor (OSHA)</li> <li>● Department of Justice (Immigration and Naturalization Service)</li> </ul>
Employment Standards Administration	<ul style="list-style-type: none"> <li>● All facets of the Department of Labor</li> <li>● Environmental Protection Agency</li> <li>● Department of Agriculture</li> <li>● State Employment Services</li> </ul>

Table 8

## Coordination Efforts (Cont.)

Program	Programs Which Services Are Coordinated With
Pesticide Farm Safety Program	<ul style="list-style-type: none"> <li>● Department of Health and Human Services (Migrant Health)</li> <li>● Department of Labor (Employment Standards)</li> </ul>
Women, Infants and Children (WIC) Program	<ul style="list-style-type: none"> <li>● Department of Health and Human Services (local health agencies)</li> </ul>
Food Stamp Program	<ul style="list-style-type: none"> <li>● Department of Health and Human Services (Aid for Dependent Children)</li> </ul>
Community Health Centers Program	<ul style="list-style-type: none"> <li>● Migrant Health Centers Program</li> </ul>
Food Distribution Program	N/A

There were also differing perceptions and practices reported relative to the organizational unit responsible for coordination. These perceptions ranged from "it's the State's responsibility to coordinate" to "we have met 10 or 12 times with the Department of Agriculture ...". However, virtually all recognized the need for some form of program coordination.

After analyzing the various responses to questions regarding efforts to coordinate, it appears that actual administrative coordination between federal level program officials rarely occurs. However, coordination does occur as a system of referrals at the local level. This type of coordination operates in one of two ways:

- (1) One program requests referrals of program participants from another or a program will refer a participant to another program
- (2) Programs have a reciprocal referral system

An example of the first type of coordination was found between the High School Equivalency Program and the Migrant and Seasonal Farmworker Program. HEP staff members will contact the Migrant and Seasonal Farmworker Program to request referrals of program participants. However, the official from the Migrant and Seasonal Farmworker Program did not state that requests for referrals are made of HEP staff members. Similarly, the official with the Handicapped Migratory Agricultural and Seasonal Farmworker Vocational Rehabilitation Service Program indicated coordinating with the Migrant Health Centers Program. However, this coordination actually is a referral of a vocational rehabilitation program participant for health care services at a migrant health clinic

and would explain why the migrant health official did not state that they coordinate with the vocational rehabilitation program.

Various program officials stated they coordinate their services with those of other programs. While our analysis of their response patterns did not always indicate reciprocal situations, the findings from this study, which did not include interviews of local program staff, should not be taken as absolute. Further study would be required to fully explain such discrepancies. For instance, the CAMP official stated that they coordinate with the Migrant Health Center Program, but the Migrant Health official did not list CAMP as a program with which they coordinate. In the case of the CAMP and Migrant Health situation, the federal level respondent reported CAMP staff members contact Migrant Health staff members to request referrals of program participants. This situation may be attributed to variations in federal level officials' familiarity with local practices. CAMP serves only 565 students and has 6 grantees, whereas the Migrant Health Program serves 450,000 with 125 grantees. Information concerning local level coordination with other programs would be more readily obtained from the CAMP grantees than the Migrant Health grantees.

Another possible explanation for the discrepancies in responses is that officials state that they coordinate with another program when in fact they may never actually contact that program, but instead refer the migrant to that program for services unavailable through their own program. An example of such a situation was noted in the Migrant Head Start Program. The Migrant Head Start program will serve children from birth through age five. If the younger migrant child in a Head Start

project has older siblings, staff members will refer those children to a Migrant Education project. Through this type of coordination, persons who are not eligible to receive services under one program may be referred to a program where they can receive services. This type of referral system could also explain why a reciprocal coordination effort is not indicated.

The second way in which some programs coordinate their services is through a reciprocal referral system. This type of system apparently is common among the local programs. For instance, Migrant Head Start and Migrant Health will refer program participants to each other when a migrant requires a service which they cannot provide under their respective programs. Migrant Health and the Migrant and Seasonal Farmworker Programs also use this type of referral system.

Local level coordination can be required by federal level policies ordering referrals. For example, the Migrant Education Program may, in addition to its educational services, also offer health care services. However, before providing health services to migrant children, Migrant Education Program staff must first contact health agencies for provision of these services. If services cannot be provided by the health agencies, then the Migrant Education Program may arrange for health care.

The concept of coordinating efforts by way of a referral system has its foundation in the sharing of program information among agencies. Staff members must be aware of what other federal programs offer as services to the migrant population and must also know where these other

programs are located. This type of coordination system is achieved at the local level where program staff are in contact with the migrants. Only the Migrant Education Program was found to mandate referrals, primarily to avoid duplication of services. At the local level, the intent of such cooperative efforts may, in fact, be influenced more by efforts to ensure that migrants receive more comprehensive services while they remain in one area.

From our analysis, it is apparent that coordination of services is desirable in order to best serve the migrant population and to avoid inefficient duplication. However, such coordination among programs is affected by several factors that result from diverse agencies attempting to administer categorical programs to the migrant population. Two are discussed below:

- Different physical locations of various program facilities
- Varying eligibility requirements for each program

Different physical locations of projects make it difficult for some programs to coordinate services at all but the local level. The manner in which the WIC program operates its projects provides an example of direct local coordination. WIC projects are located in local health agencies. When a migrant arrives for health care, WIC staff members may also screen that migrant as a potential recipient of nutritional assistance under their program. The advantages to this form of coordination are clear. Not only is this an effective means of identifying and recruiting, this situation lends itself towards reduction



in administrative costs by sharing the facility. Additionally, the migrant individual may be more likely to continue with services if they are provided in a more convenient manner, i.e., they do not have to visit several facilities to obtain the services they need. Coordination of programs within a single facility is not always feasible when the purposes of the programs are not as closely aligned as in this case.

Another factor influencing coordination of services is that each program has varying eligibility requirements for participation in their programs. As discussed in Section 3.1.2. employment activity, mobility, age and income are used as eligibility criteria in the various programs - either as a single requirement or in some combination. The various programs often target a different subset of the migrant population. Coordination can occur when persons who are not eligible to receive services under one program are referred to a program where they can receive services. Later in this section, we discuss how the eligibility criteria limit the need to coordinate for purposes of avoiding duplication of services.

### Duplication

During the interviews with program officials in each of the 16 identified programs, they were asked if they were aware of any duplication of services they provided or the population which they provided assistance to. None of the program officials with whom we spoke were aware of any duplication of efforts.

Federal level respondents perceive that duplication of efforts is avoided through coordination of referrals among the various programs at the local level. The program officials responses appear to be based on knowledge of the existence of referral systems. An additional factor perceived to control against local level duplication is funding. Each program receives funds to provide specific services to the migrant population and therefore they are under fiscal constraints that prevent them from providing any additional services outside their primary program objective. Consequently, when a migrant requires a categorical service that is outside the realm of one program, staff will refer the migrant to the program which provides the specific assistance they cannot offer. The use of referrals to other programs would explain why the program officials were unaware of duplication of efforts in serving the migrant population.

The opportunity for duplication to occur is also limited when all of the 16 programs are considered. The three basic service areas that did initially appear to offer duplication are nutritional, health and employment services.

The Food Distribution, Food Stamp, Women, Infants and Children, and Migrant Head Start programs all offer nutritional assistance. However, eligibility for the Food Stamp and Food Distribution Programs is based primarily on low income of participants. Although participants in the WIC Program must also meet low income criteria, the program is geared towards providing nutritional assistance to migrant children from birth to age five and pregnant, post partem or breastfeeding women.

Additionally, the participants (or their parents) who would receive assistance through WIC are screened prior to receipt of services. This screening allows staff members to determine the individual nutritional needs of each participant and would also determine if the migrant is currently receiving dietary supplements from other sources. Consequently, if a migrant were receiving food stamps or food through a local food bank, the nutritional assistance provided through WIC would be supplemental in nature, that is, whatever nutritional deficiency that was not met through the other programs would then be corrected through services from WIC. Similarly, if a child between birth and age five were participating in a Migrant Head Start project, WIC staff who screen potential participants would know that the child was receiving nutritional assistance from Head Start and this would prevent duplication of services.

Migrants may receive employment assistance through the High School Equivalency, Migrant and Seasonal Farmworker, and the Handicapped Migratory Agricultural and Seasonal Farmworker Vocational Rehabilitation Programs. All three programs will serve persons in virtually the same age range. However, a migrant must be handicapped to receive vocational rehabilitation services and therefore, services under that program would be specialized training and job placement assistance. The HEP participant receives job placement services after or in conjunction with educational services. One feasible reason a migrant who was involved in a HEP program would seek assistance from a Migrant and Seasonal Farmworker project would be if the participant were dissatisfied with the employment assistance received from HEP. These three programs do offer

similar employment services, however, the different eligibility criteria would not lend themselves towards duplicating services.

Finally, as previously discussed in this section, the Migrant Education Program and Migrant Health Centers Program may offer health care services to children of school ages. In this instance, duplication of efforts is avoided through a referral system mandated by Migrant Education Program regulations. The Migrant Education Program may provide health services for migrant children only after requests have been made of State/local health agencies to provide the services. However, duplication of services on an individual basis may occur within a program. For example, a migrant child could receive duplicative inoculations because health records are not forwarded with the child as he/she moves and therefore duplication of services to an individual could occur.

### 3.4 Program Monitoring and Evaluation

The following section will discuss the information obtained concerning data bases and data collected and maintained by the various agencies, and the methods by which the various programs are evaluated to measure effectiveness.

#### 3.4.1 Data Bases and Data Collected and Maintained

According to the program officials interviewed, only one program - Employment Standards Administration - does not maintain some variation of a data base. The other 15 programs did maintain some type of data base ranging from basic files on individuals served (e.g., Migrant Legal Action Program) to a national computerized system such as the Migrant Student Record Transfer System (see Exhibit G and Table 9).

There are a great deal of inconsistencies with respect to data bases and data collected by these various federal programs.

The variations in data bases and data collected range from:

- National to local level data bases
- Individual information to broad program participant characteristics
- Computerized to paper-based data bases

Of all the data bases identified just one - the MSRTS - maintains information on a national basis for individual children (i.e., nationally representative data are maintained at and available on the national

Exhibit G  
COMPARISON OF DATA BASE AND ELEMENTS MAINTAINED

Program	STORAGE MEDIUM		LOCATION		TYPE OF DATA		
	Data Base Not Maintained	Computerized	Paper-Based	Maintained at Federal Level	Maintained at Grantee Level	Individual Information	Broad Participant or Program Information
Pesticide Farm Safety		X		X			X
Food Distribution			X		X		X
Women, Infants and Children		X		X			X
Food Stamp			X		X		X
Community Health Centers		X		X			X
Migrant Health Centers		X		X			X
Migrant Legal Action		X	X		X	X	
Migrant and Seasonal Farmworker		X		X			X
Occupational Safety and Health Admin.		X		X			X
High School Equivalency		X	X		X	X	
College Assistance Migrant		X	X		X	X	
State Migrant Education		X		X		X	
Handicapped Mig. Agric. and Seas. Farmworker Voc. Rehab.			X		X	X	
Migrant Head Start		X		X			X
Employment Services			X		X	X	
Element Standards Admin.	X						

3-65

Table 9

## Data Bases and Elements Maintained

Program	
High School Equivalency Program (HEP)	Data bases are maintained at the institutional level. Grantees are required to maintain complete accounting, performance and personnel records.
College Assistance Migrant Program (CAMP)	Data bases are maintained at the institutional level. Grantees are required to maintain complete accounting, performance and personnel records.
State Migrant Education Program	MSRTS is a national automated telecommunications system which contains educational and health data on individual students. (Contains approximately 800,000 names.) Additionally, grantees are required to maintain records concerning accounting, personnel and performance.
Handicapped Migratory Agricultural and Seasonal Farmworker Vocational Rehabilitation Service Program	Each State collects general information for the State program for the handicapped. Data elements maintained include numbers served and cost per person.
Migrant Head Start Program	National computerized information system. All grants are computerized and make up the initial base of the system. Performance indicators such as number served, location, and health and education services provided are entered as well as cost data - each grantee submits an indepth analysis of fiscal expenditures based on program services (these analyses deal with quantity not quality).

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## Data Bases and Elements Maintained (Cont.)

Program	
Employment Services	Data bases are not maintained on a national level, however applicant files are maintained at the grantee level.
Employment Standards Administration	Data bases are not maintained.
Pesticide Farm Safety Program	Data base maintained at the Federal level. Data elements collected include: number of exposures to pesticides, products are registered with health effects of pesticides, clothing to be worn when applying chemicals and residue levels allowed on food for consumers. All of these elements are industry input data.
Food Distribution Program	Data bases are maintained at the State level and data elements are "declarations of need", that is what eligibility criteria a person qualified with for services.
Women, Infants and Children (WIC) Program	Data base is maintained as a computerized Program Report at the Federal level. Data elements are number of migrant participants and fiscal expenditures.
Foods Stamp Program	Data base is maintained at the grantee level - files are maintained on activities such as numbers served and cost data.
Community Health Centers Program	Data bases are maintained at the Federal level. Program indicators are maintained at the grantee level which include: average cost per patient, number of patients, charges as a % of reimbursable costs, collections as a % of billings, % of total ambulatory costs attributable to administration, documentation of immunizations, counseling sessions, follow-up treatment, and adherence of treatment for hypertension. All of the program indicators are based on the Bureau of Common Reporting Requirements (BCRR) - each project is required to submit a report every 6 months.

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Table 9

## Data Bases and Elements Maintained (Cont.)

Program	
Migrant Health Centers Program	Data bases are maintained at Federal level. Program indicators are maintained at the grantee level which include: average cost per patient, number of patients, charges as a % of reimbursable costs, collections as a % of billings, % of total ambulatory costs attributable to administration, documentation of immunizations, counseling sessions, follow-up treatment, and adherence of treatment for hypertension. All of the program indicators are based on the Bureau of Common Reporting Requirements (BCRR) - each projects is required to submit a report every 6 months.
Migrant Legal Action Program	Data bases are not a national system. Some grantees computerize the number served or individuals served, but the main data bases are the case files, which due to confidentiality, are not accessible unless required to assist in counseling a case.
Migrant and Seasonal Farmworker Program	At the federal level, the data collected and maintained are the numbers served. On grantee level, data includes costs, participant characteristics, and numbers served.
Occupational Safety and Health Administration (OSHA)	Data base maintained at federal level. Data elements are the number of: inspections, referrals, complaints, accidents, follow-up inspections, citations, penalties, contested penalties, employees at a camp at time of inspection, total violations and OSHA man hours expended. (IMS is the new data system, however it is 6 months behind.)

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level). The MSRTS is a national automated telecommunication system which contains academic and other information on migrant children. The information provided to participating schools through this system not only concerns the educational background of migrant children, but health records as well.

The costs associated with utilization and maintenance of the MSRTS are covered by the States, which provide a portion of their Chapter 1 funds which are allocated for migrant programs to the Secretary of Education for operating the system. The MSRTS may be utilized for two basic purposes:

- (1) To retrieve education and health data that have previously been entered into the system for a migrant child; and
- (2) To enter pertinent data for a newly enrolled migrant student.

When a student has been entered into the system, a student identification number is assigned. If a migrant child moves to another school, the student identification number can be inputted on a terminal and the personnel at the child's new school can access the student's record. Essentially, this data collection and retrieval cycle is intended to aid school personnel in tracking of migrant students to ensure they are receiving the necessary program services suitable for their unique educational needs. (The difficulties with the MSRTS for purposes of tracking are discussed in Section 3.2.2.)

The MSRTS also provides information for determining allocations to the States for migrant program funds. For purposes of allocating funds,

a migrant program allocation subsystem was created which essentially extracts from the system's data base that information necessary for calculating allocations to the States.

According to an interviewee at the Migrant Legal Action Program:

"The best data base is MSRTS - and even that vastly, vastly undercounts the number of children (due to their mobility). The MSRTS is the only data base that has made an attempt to keep track of migrants individually."

As shown in Exhibit H, nine programs collect data based on program management issues such as funding, expenditures, numbers served, and cost per participant served, or on broad participant characteristics such as eligibility criteria (e.g., level of income). Of the 15 programs which maintain data bases, 11 have computerized systems, 7 are paper-based (i.e., files and records), and 3 maintain data bases in either form depending upon the grantee. However, although 11 programs have a computerized data base, only two (the MSRTS for Department of Education Programs and the Migrant Head Start Program) maintain the data base on a national level. However, the MSRTS is the only data base with information on individuals maintained at the national level.

Thirteen of the 15 programs which do maintain data bases do not have a national system. Of these 13 programs, 6 program data bases are maintained at the federal level and the remaining 7 are at the grantee level. These programs are as follows:

Federal Level

- Pesticide Farm Safety Program
- Women, Infants and Children Program
- Community Health Centers Program
- Migrant Health Centers Program
- Occupational Safety and Health Administration
- Migrant and Seasonal Farmworker Program

Grantee Level

- High School Equivalency Program
- College Assistance Migrant Program
- Handicapped Migratory Agricultural and Seasonal Farmworker Vocational Rehabilitation Services Program
- Employment Services
- Migrant Legal Action Program
- Food Distribution Program
- Food Stamp Program

It would seem that inconsistencies in funding levels, target population and possibly evaluation measures could influence whether a data base is maintained and what specific information is collected. The MSRTS would appear to be the most sophisticated data base maintainer.

### 3.4.2 Evaluation Methods

After analyzing the evaluation methods used to gauge effectiveness in each of the 16 programs, the programs are generally evaluated in either one or a combination of these four areas:

- Numbers served (12 programs)
- Cost effectiveness (6 programs)
- Improvement measures (5 programs)
- Quality of services (2 programs)

Of the 16 programs, 4 are evaluated based on only 1 of the 4 criteria listed above. The remaining 11 programs are evaluated based on a combination of 2 or 3 of the criteria. The Pesticides Farm Safety Program is not included in this count because the program is not evaluated for measures of effectiveness. This most likely can be attributed to the nature and intent of this program, i.e., it is an informational/educational service.

As shown in Exhibit H and Table 10, 12 of the 15 programs are evaluated on the basis of numbers served. The three programs which are not evaluated on this criteria are:

- Migrant Head Start Program
- Migrant Legal Action Program
- OSHA

Exhibit H  
Comparison of Evaluation Criteria

Program	Numbers Served	Cost Effectiveness	Improvement Measures	Quality of Services	Number of Compliance Actions
State Migrant Education	X		X		
College Assistance Migrant	X		X		
High School Equivalency	X		X		
Handicapped Mig. Agric. Seas. Farmworker Voc. Rehab.	X	X	X		
Migrant Legal Action				X	
Migrant Head Start			X		
Migrant and Seasonal Farmworker	X	X			
Migrant Health Centers	X	X			
Employment Standards Admin.	X				X
Employment Services	X				
Pesticide Farm Safety					
Community Health Centers	X	X			
Women, Infants and Children	X	X			
Occupational Safety and Health Admin.				X	X
Food Distribution	X				
Food Stamp	X	X			

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Table 10

## Methods of Evaluation

Program	Methods of Evaluation
High School Equivalency Program (HEP)	Grantees must submit an evaluation report annually which includes: (1) number of students served, (2) number of successful placements, (3) number of students who do not complete the program, and (4) achievements measured as grade point averages (GPA).
College Assistance Migrant Program (CAMP)	Grantees must submit an evaluation report annually which includes: (1) number of students served, (2) number of successful placements, (3) number of students who do not complete the program, and (4) achievements measured as grade point averages (GPA).
State Migrant Education Program	Program will be evaluated on number of children served and achievement gains.
Handicapped Migratory Agricultural and Seasonal Farmworker Vocational Rehabilitation Service Program.	Grantees are evaluated on: (1) the number of disabled persons served, (2) the number rehabilitated and/or assisted to live more independently, (3) improvement in work or independent living status following receipt of services, (4) new services or improved service delivery systems, (5) increased participation by other kinds of program improvements, and (6) budget and cost effectiveness.
Migrant Head Start Program	Grantees submit a self-assessment based on program performance standards and are evaluated by program officials site every 3 years. Measures of effectiveness include: (1) improved performance on school achievement tests, (2) gains in cognitive development, (3) decrease in grade retentions and special class placements, (4) positive impact in child socialization and development of socially mature behavior, (5) lower absenteeism from school, (6) more immunizations, (7) better nutritional practices and generally better health, (8) improved interactions between parents and children, and (9) increase in later parent participation in public schools.

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## Methods of Evaluation (Cont).

Program	Methods of Evaluation
Migrant Health Centers Program	Grantees are evaluated based on program indicators which include: average cost per patient, number of patients, charges as a % of reimbursable costs, collections as a % of billings, % of total ambulatory costs attributable to administration, documentation of immunizations, counseling sessions, follow-up treatment, and adherence to treatment for hypertension. All of the program indicators are based on the Bureau of Commor. Reporting Requirements (BCRR) - each project is required to submit a report every 6 months.
Migrant Legal Action Program	Evaluation measures are not quantitative, rather they are based on the quality of resources such as personnel. Grantees are required to submit evaluation reports based on quality of services and refunding decisions are based on these reports.
Migrant and Seasonal Farmworker Program	Grantees submit quarterly reports and evaluations are based on performance standards which are: (1) the cost per entered employment, (2) entered employment rate, (3) the number the grantee proposes to place versus number actually placed. All of these indicate the rate of placement and cost per placement.
Occupational Safety and Health Administration (OSHA)	Evaluations based on number of inspections and the types and quality of inspections.
Employment Services	Monitoring of program is conducted as opposed to evaluation. Monitor Advocates (at federal and State level) monitor services to migrants to ensure they receive proper services. Each staff member at an office which serves significant numbers of migrants (there are over 100 such offices) must reach 5 migrants per staff member.



Table 10

## Methods of Evaluation (Cont).

Program	Methods of Evaluation
Employment Standards Administration	Evaluation based on number of registrants and number of compliance actions.
Pesticide Farm Safety Program	This program is not evaluated for measures of effectiveness.
Food Distribution Program	Measure of effectiveness based on numbers served, and determination of waste, fraud and abuse that could potentially deny needed services to the target population.
Women, Infants and Children (WIC) Program	Monitoring procedures based on quarterly and cumulative figures representing migrant participation, migrant expenditures, unspent migrant monies and remaining migrant monies available for the remainder of the fiscal year.
Food Stamp Program	States are required to submit activity reports every one to three years depending on the size of the project (small projects are reviewed every 3 years). Activity reports include number of persons and households served, geographic locations of projects, cost data, number of issuance units and certification offices.
Community Health Centers Program	Grantees are evaluated based on program indicators which include: average cost per patient, number of patients, charges on a % of total ambulatory costs attributable to administration, documentation of immunizations, counseling sessions, follow-up treatment, and adherence to treatment for hypertension. All of the program indicators are based on the Bureau of Common Reporting Requirements (BCRR) - each project is required to submit a report every 6 months.

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A Migrant Legal Action Program official commented that:

"Ours is not a business of counting. Refunding is based on quality of work and the type of support given - nothing quantitative."

Another respondent at the Migrant Legal Action Program echoed this comment by saying:

"We're not in the numbers game - we're monitored based on the quality of work."

The unit of measure for these programs is legal cases. The lack of available numbers served may be attributed to a different philosophy guiding this program in comparison to the others. Legal Services are provided on a qualitative basis - attorneys are concerned with the quality of legal aid they provide, not with the number of clients they counsel. Attorneys are evaluated by their professional peers based on professional norms and standards of performance. Therefore, based on a qualitative philosophy this program stresses excellence in services provided and de-emphasizes the number of clients served. Similarly, the Occupational Safety and Health Administration is evaluated based on quality of the inspections as well as the number and type of inspections.

Of the 12 programs which are evaluated based on numbers served, the following 6 are also evaluated on cost and budget effectiveness:

- Handicapped Migratory Agricultural and Seasonal Farmworker Vocational Rehabilitation Service Program
- Migrant Health Centers Program

- WIC Program
- Food Stamp Program
- Community Health Centers Program
- Migrant and Seasonal Farmworker Program

Cost effectiveness is measured in terms of whether the costs are reasonable in relation to the objectives of the program, and if the budget is adequate to support the program activities.

There are five programs which are also evaluated on improvement measures (such as nutrition levels, students' grade point averages, general achievement gains, etc.). The following is a list of these programs:

- High School Equivalency Program
- College Assistance Migrant Program
- State Migrant Education Program
- Handicapped Migratory Agricultural and Seasonal Farmworker Vocational Rehabilitation Service Program
- Migrant Head Start Program

Since the transfer of administrative responsibility for HEP and CAMP in 1980 from the Department of Labor to the Department of Education, an evaluation of these two programs has not yet been performed. However, these programs will be formally evaluated this year by ED. The last evaluation conducted in 1979-80 by Clark, Phipps, Clark and Harris, Inc. (under contract to the Department of Labor) calculated program effectiveness on the following criteria for HEP:

- Number of students
- Cost per student
- Job placement rates
- Number of students who passed the GED examination

CAMP was also evaluated based on:

- Number of students
- Cost per student
- Retention rates
- Number of terminations
- Grade attainment of students

The success rate for the full four years of college will be researched in the evaluation conducted this year as well.

The Migrant Head Start Program is evaluated on several different criteria, all of which are improvement oriented. Measures of program effectiveness focus on improvements in school achievement, cognitive development, socialization and socially mature behavior, absenteeism, nutrition, general health and parental involvement. This program focuses on the general development of a child and is evaluated based on the gains in general development of the children who receive services.

Similarly, the Handicapped Migratory Agricultural and Seasonal Farmworker Vocational Rehabilitation Service Program is also evaluated on the basis of improvements in the lifestyle of service recipients. Effectiveness is measured not only in terms of the numbers served, but

also the number who are rehabilitated and assisted by program services to live a more independent life through improvement in their work status.

It appears that the major focus of evaluation is on the numbers served and cost effectiveness. Only five of the programs are evaluated based on improvement gains in program participants. The number of persons served under a program may have some bearing on whether the program is evaluated on numbers served or on improvement measures. For example, the Migrant Head Start Program measures improvement in nutrition and health of the children it serves, whereas the Food Stamp and Food Distribution Programs do not measure gains in nutrition of program participants and the Migrant and Community Health Centers are not evaluated on the basis of health improvements. However, Migrant Head Start serves 18,000 children and the other 4 programs serve between 450,000 a year to 21 million a month. Therefore, large numbers served under a program may prevent a program from calculating improvement gains and would consequently not be evaluated on such a criteria. Although the Migrant Education Program serves a large number of children, virtually any program which provides educational services would be evaluated on the basis of achievement gains in those persons who receive educational services.

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**B**

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## APPENDIX B

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