

THE IMPLEMENTATION OF THE MIGRANT EDUCATION POLICY IN MISSOURI:
A MULTI-LEVEL ANALYSIS

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by
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The undersigned, appointed by the dean of the Graduate School, have examined the dissertation entitled

THE IMPLEMENTATION OF THE MIGRANT EDUCATION POLICY IN MISSOURI:
A MULTI-LEVEL ANALYSIS

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a candidate for the degree of doctor of philosophy,
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DEDICATION

I dedicate this work to my family and friends whose support and love made this journey possible.

I love you all!

To my parents, Sam and Annette, your unwavering support and unconditional love has always been my rock and foundation. Thank you for instilling in me the belief that I can accomplish anything. You taught me determination and perseverance in the face of adversity. You gave up so much and struggled for years to make my dreams possible. You inspire me to be a good person and a good parent. Thank you for all that you have done and all that you do.

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ABSTRACT

This embedded case study, using contemporary policy implementation research as my conceptual framework to examine the interpretation and implementation of the Migrant Education Policy across four distinct policy levels, three of which are located in Missouri. The findings of this study demonstrate that policy implementers sometimes lack the will and/or the capacity to effectively implement the Migrant Education Policy in Missouri. Differing perspectives on identifying migrant students and using the MAP to determine student achievement are two areas of concern for the policy implementers. All participants suggested that migrants' social and health needs are as important as their academic needs. While engaging migrant parents is a struggle for most districts, a single district was able to involve their migrant parents more than the other districts. The findings of this study highlight gaps and discrepancies in the way the Migrant Education Policy is adapted and implemented at different policy levels, suggesting a communication breakdown or miscommunication somewhere in the implementation process. These findings also confirm the need for additional training for the different policy implementers. The information obtained could be used to improve the implementation process, thereby, improving the state, the regions, and the districts' abilities to provided equitable access to educational opportunities to migrant students in Missouri.

CHAPTER ONE: INTRODUCTION

The 1960s brought about many changes to education policy in the United States. One major action resulting in a momentum shift was President Johnson's call for a Great Society in 1964 to reduce poverty, promote equality, improve education, rejuvenate urban cities, and protect the environment (PBS, n.d.; Schugurensky, n.d.). A centerpiece of Johnson's Great Society, was the War on Poverty in 1965 (PBS, n.d.; Schugurensky, n.d.). The Elementary and Secondary Education Act (ESEA) of 1965 was arguably the centerpiece legislation in Johnson's War on Poverty, in that it created and provided funding for many disadvantaged youth programs to eliminate poverty and promote equality (PBS, n.d.; Schugurensky, n.d.). A year following the ESEA, in 1966, another piece of legislation enacted was the Migrant Education Program (MEP). The Office of Migrant Education (OME) administers the enactment of the Migrant Education Policy in the ESEA. Despite being in place for more than 50 years, there is still a commitment to this policy as evidenced in the No Child Left Behind Act (NCLB) in 2001 (Branz-Spall & Wright, 2004). The MEP specifically targeted disparities for migrant youth in educational systems across the country.

To adequately address the educational disparities for migrant students, the MEP established a specific definition of what constitutes a migrant child, and, therefore, eligible for MEP services. The MEP defines a migrant child as:

1. The child is not older than 21 years of age; *and*
2. The child is entitled to a free public education (through grade 12) under State law or is below the age of compulsory school attendance; *and*

3. The child is a migratory agricultural worker or a migratory fisher, or the child has a parent, spouse, or guardian who is a migratory agricultural worker or a migratory fisher; *and*
4. The child moved within the preceding 36 months in order to seek or obtain qualifying work, or to accompany or join the migratory agricultural worker or migratory fisher identified in paragraph 3, above, in order to seek or obtain qualifying work; *and*
5. With regard to the move identified in paragraph, above, the child:
 - a. Has moved from one school district to another; *or*
 - b. In a State that is comprised of a single school district, has moved from one administrative area to another within such district; *or*
 - c. Resides in a school district of more than 15,000 square miles and migrates a distance of 20 miles or more to a temporary residence to engage in or to accompany or join a parent, spouse, or guardian who engages in a fishing activity. (This provision currently applies only to Alaska.)
(Title I, Part C Draft Non-Regulatory Guidance, 2010, p. 9-10).

In addition, the MEP established specific, defined outcomes for these migrant children. The essence of the MEP is to improve school readiness, access to educational opportunities, and increase parental involvement with schools for migrant children. Noting that there are gaps in the educational system that cause migrant students to not have the same opportunities, this policy embraces the need to improve educators' skillset in working with migrant families and children. Specifically, the policy addresses professional development, integration of appropriate technologies in these schools to reduce barriers for students and families when they transfer between schools, and a commitment to provide support and resources to increase graduation rates (Title I, Part C Draft Non-Regulatory Guidance, 2010).

At the heart of the War on Poverty, the ESEA and the MEP is that all children deserve an education. These are not the only contributing influences to demand access to educational opportunities for migrant students. Several landmark court cases support migrant students' entitlement to education, including *Brown v. Board of Education* (1954) and *Plyler v. Doe*

(1982). *Brown v. Board of Education* (1954) declared that “separate” is not equal. This case allowed for desegregation and the integration of the races in a single school and a single classroom. *Plyler v Doe* (1982) declared that schools must allow undocumented immigrants in their schools without charging them extra tuition fees. Both of the cases listed above illustrate how differences between students, based on social and/or legal constructs or other distinguishing factors, could not be used to substantiate unequal educational opportunities or access.

Unlike other children living in poverty, migrant children are identified for specific at-risk concerns in the educational system because of their transient nature due to their families’ seeking available agricultural work (Branz-Spall, Rosenthal & Wright, 2003; Gouwens, 2001). Specifically, migrant students’ frequent mobility leads to low school attendance because children enroll late, withdraw early, or simply not attend school (Gouwens, 2001; Valenzuela, Garcia, Romo, & Perez, 2012). This results in students falling behind and/or unable to earn credits needed for graduation.

There are data that migrant students are at a further disadvantage because curriculum is a localized policy and when students, such as transient migrant students, move across state and district lines, they find that there are different requirements for graduation (Duron, 2004; Gouwens, 2001; Kandel, 2008; Salinas & Reyes, 2004a, 2004b; Solis, 2004). Graduation rates are not the only indication that unequal experiences exist for migrant students. There are also data showing higher dropout rates for migrant students compared to students more broadly (Solis, 2004) with drop-out estimates for this migrant students estimated at 65 percent to 80 percent (Triplett, 2004). A migrant student’s inability to earn credits and graduate high school (or equivalent) means that migrant students will have difficulty seeking post-secondary

education. Potentially, it could also promote the cycle of poverty from which these students cannot escape. The highly mobile nature of this population and the changes in the agricultural industry suggests that the historical migrant routes are shifting and migrant students are appearing in new school districts.

Additionally, a large portion of the migrant population are Latino and speak Spanish within their communities (Kandel, 2008). In following the U.S. Census Bureau, this study defines Latina/o individuals as those whose ethnic heritage and origins are from Mexico, Cuba, Puerto Rico, Central America, or South America (US Census, n.d.). As a result, one of the most pressing needs of the students and their families is the acquisition of the English language (Duran, 2003). English Language Learners (ELLs) encounter substantial challenges in U.S. schools that include, among others, inadequate and/or unequal resources, the lack of quality instruction by well-prepared teachers (Crawford, 2007; McNeil, 2000; McNeil & Valenzuela, 2001; Valenzuela 1999; Valenzuela et al., 2012), and scrutiny in the form of “exclusion, discrimination, segregation and marginalization” (Coulter & Smith, 2006, p. 334). For migrant students, language acquisition can be more challenging because of their frequent mobility (Ashiabi, 2005; Keogh, Halpenny, & Gilligan, 2006; Rumbaut, 1997; Valenzuela et al., 2012).

The challenges for migrant students to succeed in the educational system are not solely rooted in educational issues; rather, social and cultural challenges also present issues that can influence migrant students’ abilities to be academically successful. For example, research found that high levels of parental involvement are related to higher levels of academic success for students (Beckett, Glass, & Moreno, 2012; Jasis & Jasis, 2012; Lee & Bowen, 2006; Lopez, Scribner, & Mahitivanichcha, 2001). In her study of a Hispanic migrant community in western

North Carolina, Velasquez (1996) found that many migrant parents viewed school as an added pressure that required conformity to the dominant culture reinforced by teachers and rejection of their own culture. While many migrant parents viewed their schooling experience as meaningless and useless, most want a good education and a better life for their children. These views of schooling lead many students to do poorly in school, and in some cases, eventually drop-out altogether (Valencia & Black, 2002; Velasquez, 1996). However, this does not reflect migrant families' lack of value in education; rather it reflects the cultural differences and disconnect migrant students feel toward their own culture and the school's culture (Lopez, Scribner, & Mahitivanichcha, 2001; Valencia & Black, 2002). For these parents, they may want their children to have access to a better life, just not at the expense of conforming to the dominant culture and dismissing their cultural traditions.

Studies show that migrant families value the family and cultural traditions (Parra-Cardona, Bullock, Imig, Villarruel, & Gold, 2006) as well as retaining their culture and values, including customs, traditions, and language (Velasquez, 1996). The schools' lack of understanding or misunderstanding of these and other cultural differences results in a perceived lack of parental involvement (Jasis & Jasis, 2012; Lopez, 2004; Sosa, 1997; Valenzuela, 1999) which is many times masked by the parents' lack of English-language understanding and/or masked by the cultural differences between the schools and the family (Jasis & Jasis, 2012). In many instances, the children must act as cultural and linguistic brokers between their parents and the outside English-speaking world (Dorner, Orellana, & Grining, 2007; Morales, Yakushko, & Castro, 2012; Valenzuela, 1999). This challenge presents positives and negatives. While students develop a better appreciation of the challenges their parents face, students sometimes

feel burdened by the demand this role creates (Duran, 2003; Morales, Yakushko, & Castro, 2012).

Purpose of the Study

The intention behind the MEP is to improve the educational experience for migrant youth, but the outcomes of this policy also addresses the needs of students within the larger educational system. One of the aspects of this policy outlines how schools and educators face challenges and may not be appropriately prepared. Educators, schools and policy makers must find ways to serve this group of students across district boundaries and across state boundaries in a way that does not hinder the educational success for the student to meet accountability and performance metrics (Branz-Spall & Wright, 2004; Cobb-Clark, Sinning, & Stillman, 2012; Free, Kriz, & Konecnik, 2014; Green, 2003; Kandel, 2008).

The barriers for migrant children are extensive and go beyond just socio-economic status. Nationally, efforts to remove these barriers for all students exist, but even with the integration of strategies, data still demonstrate a decline in the number of migrant students annually since 2008 enrolled in schools (see Table 3 and Table 4 in Appendix A) and educational needs and expectations remain unchanged. Similar to national trends illustrated in Tables 3 and 4 (see Appendix A), Tables 5 and 6 in Appendix A focus on Missouri and demonstrate a parallel to the national trends. The specific reasons why these declines are not clear, but any decrease in the number of migrant students enrolled in the school translates to fewer dollars for the districts and schools leaving schools without adequate funding to meet the needs of the Migrant Education Policy.

The purpose of this study is to gain a better understanding of the process of interpretation and implementation of the Migrant Education Policy across different policy levels. Again, the MEP seeks to improve migrant children’s educational opportunities and improve their academic success (Title I, Part C Draft Non-Regulatory Guidance, 2010). The goal of the study is to understand how migrant education policy changes and shifts in its implementation as it moves across multiple levels of the system in a single state (Missouri). Presently, there is limited research on the implementation of Migrant Education Policy nationally. Presently, no other study has examined Missouri’s Migrant Education Policy. However, the Cambio Center at the University of Missouri conducted a four-year study on Latina/o newcomers in three rural Missouri communities. Their study produced numerous publications on these new Latino destinations (MU Cambio, 2014). Most of the research focuses on larger numbers of migrant students in a single district, or identifies areas of need without examining how those needs align to the policy’s intended goals and purposes (Branz-Spall & Wright, 2004; Branz-Spall, Rosenthal, & Wright, 2003; Cobb-Clark, Sinning, & Stillman, 2012; Duron, 2003; Free, Kriz, & Konecnik, 2014; Gouwens, 2001; Lopez, 2004; Parra-Cardona, Bullock, Imig, Vilarruel, & Gold, 2006; Salinas, 2013; Salinas, 2011; Salinas & Reyes, 2004a; Salinas & Reyes, 2004b; Solis, 2004; Velasquez, 1996). This study sought to answer the following questions:

1. How does the US Department of Education’s Office of Migrant Education interpret and implement the Migrant Education Policy?
2. How does the Missouri Department of Elementary and Secondary Education’s Office of Migrant Education, ELL, Immigrant & Refugee (MELL) interpret and implement the federal Migrant Education Policy?

3. How do the regions interpret and implement the federal Migrant Education Policy?
4. How are Missouri school districts interpreting and implementing the Migrant Education Policy?

Missouri, is a state now being defined as part of the new Latino diaspora (Artz, Jackson, & Orazem, 2010; Burnett & Luebbering, 2007; Clotfelter, Ladd, & Vigdor, 2011; Dozi & Valdivia, 2005; Flores, Mendoza, Ojeda, He, Meza, Medina, & Jordan, 2011; Gouveia & Saenz, 2000; Hamann & Harklau, 2010; Hamann, Wortham, & Murillo, 2002; Lazos & Jeanetta, 2002; Kipp, 2011). Understanding this process of implementation from the federal (macro level), the state level, the various regions of the state (Missouri), and the various school districts (micro level), revealed how the intended outcomes of this policy were being met, and contributes to the knowledge base on policy and practice for migrant students.

By examining policy shifts across four distinct policy levels, this study examined how the policy is interpreted and implemented. This understanding allowed for the discovery of gaps in the implementation process in meeting the policy goals that aspire to ensure equitable educational opportunities to migrant students. Within policy implementation, implementers make policy adaptations based on their individual beliefs and the local context. While this makes policy implementation strong and appropriate, it can also create weaknesses in the process when implementers lack the knowledge and the desire to create sound processes. This is important because it allowed for the discovery of variations based on the application of the policy in various communities. Analysis of these details allowed for a better understanding of how the federal policy and the intended outcomes were adapted and applied by the different policy implementation levels.. This process better identifies if a policy is current or if aspects are

obsolete as the needs of the target population change. To understand this process, I used a policy implementation theoretical framework to analyze the implementation of the MEP as it was adapted and implemented from the macro level to the micro level.

Theoretical Framework

A policy implementation theoretical framework guided this study as it takes into account the various levels, agencies, and individuals who influence the execution of a policy. More specifically, this lens highlights the interconnectedness of the macro, intermediary, and micro levels of policy implementation and may increase the understanding for how a policy meets intended outcomes and identifies any unintended consequences (Honig, 2006a; McLaughlin, 1987; Young & Lewis, 2015) of the policy. The contemporary generation of policy implementation research focuses on understanding differences between organizational entities' implementation processes and priorities (Honig, 2006a; Owens, 2014; Young & Lewis, 2015).

This framework provided an appropriate lens to analyze the data and answer the research questions because it allowed for the discovery of how the Migrant Education Policy, its implementation and its processes, changed and shifted at different policy levels. It also considered the re-interpretations by the different policy levels' implementers, therefore demonstrating how the policy and its outcomes were adapted until reaching the target population. Additionally, this lens allowed for an understanding of the implementers' beliefs and knowledge of the policy that influenced the way they interpreted and implemented the policy.

Research Design

A multi-level, embedded multi-case study is a natural fit for a study built around policy implementation because it focuses on relationships within the case (Yin, 2014). Embedded

multi-case studies are appropriate for this study because the primary unit of study is the implementation of the Migrant Education Policy. These various units of analysis serve as the bounds for the embedded case studies, all of which are bounded by the larger context of the implementation of the policy (Yin, 2014). This creates embedded multiple cases within a larger case study about the implementation of the Migrant Education Policy.

Significance of the Study

This study addresses a gap in the literature by examining the implementation of the MEP in a new setting, specifically, Missouri. As noted previously, no other study has yet to examine the implementation of the MEP in Missouri. Additionally, the findings of this study can improve the educational equity and access for migrant students throughout the educational pipeline, specifically, the primary, secondary, and post-secondary arenas. Barriers for migrant students in secondary education create reduced access for these students to pursue post-secondary educational options (Baum & Flores, 2011; Long, 2014). Hindering migrant students' access to educational opportunities limits their ability to escape the cycle of poverty, thereby limiting their ability to improve their socioeconomic status and livelihood, and that of their family. Arguably, this is the foundational premise of the MEP, the ESEA of 1965, and the War on Poverty. This study does not provide all the answers, or fill all the gaps in the literature. However, it is a beginning for further exploration in an area that is not explored fully. The most significant piece is the potential information learned about the Migrant Education Policy in Missouri and can be used to potentially improve its implementation at the state level and/or regional and/or the district level.

Organization of the Study

This study is a multi-level embedded multi-case study addressing implementation of the Migrant Education Policy in a single state, Missouri. In chapter two, I present a historical review of migrant farmworker policies as well as four federal policies that assist migrant students. I also explore how the new Latino diaspora is shaping the conversation about migrant education. Finally, I present scholarship about barriers influencing migrant children's education. Chapter three presents policy implementation as the theoretical lens to guide the research questions designed to understand how the Migrant Education Policy is interpreted and adapted at each of the four distinct policy levels. Chapter four describes the methodology and methods used to discover how Migrant Education Policy is interpreted, adapted, and implemented at each of the distinct policy levels. I use an embedded, multi-case study including ten participants. In chapter five, I present the findings from this study. In this chapter, I answer the research questions in the order they were originally presented. The chapter begins by presenting how the federal (macro) level, U.S. Department of Education's Office of Migrant Education, implements the MEP. Next, the chapter presents a description of how the state (intermediary) level, the Missouri Department of Elementary and Secondary Education's Office of Migrant Education, ELL, Immigration & Refugee, interprets and implements the MEP. Third, the chapter presents how the regional (intermediary) level interprets and implements the MEP. The chapter concludes by presenting a description of how Missouri school districts, represent the micro, street-level bureaucrat policy level, interprets, and implements the MEP. The final chapter, Chapter six, reviews and summarizes the findings of this study. Next, I discuss implications and recommendations for future policy implementation at the state, regional and district level. I close the last chapter by presenting potential areas of future research based from the findings of this study.

CHAPTER TWO: LITERATURE REVIEW

In order to develop a contextual perspective about migrant education in the United States, I use the existing scholarship to share a historical perspective about Federal policies associated with migrant workers in the United States, an overview current Federal policies assisting migrant students, and, finally, an examination of the New Latino Diaspora (NLD). In addition, this review concludes with an examination of migrant students' cultural, social, and educational disparities.

Introduction

When considering the nature of humans and their survival, the tendency to be nomadic searching for and following food sources across vast distances was essential for survival. Although societal advances shifted, the necessity to be transient based on food availability, there is still a segment of the population who patterns that nomadic behavior for work. Similar to nomadic ancestors, migrant workers use the seasonal changes and agricultural needs as an occupational template, moving across vast distances to participate in harvesting foods and products for survival. The US Department of Agriculture (USDA) defines hired farmworkers as persons who are employed on a cash or salary basis and include “field crop workers, nursery workers, livestock workers, farmworker supervisors, and hired farm managers” (Aguirre International, “Background,” 2006, para1). In fact, migrant works are integral to the agribusiness sector as they perform many of the jobs not filled by the local workforce. Migrant farmworkers do jobs that many US citizens will not do because the wages are low and the work is difficult (Clotfelter et al., 2011; Gouveia & Saenz, 2000; Kipp, 2011) and is often undervalued and stigmatized (Rochin, 2000). The positions these workers fulfill include picking fruit and

vegetables, processing meat (including chicken, beef, turkey, pork), and fishing. These efforts to harvest food, often unacknowledged, as many people in the United States are not aware of how food gets from the farm to the table.

Understanding the migrant workers plight is beyond the scope of this research, but inherent components associated with migrant work, such as moving frequently and possible non-native speaking language barriers of parents and family members, work environment (e.g., long hours, workload, and living conditions) and possible consequences, if any, influencing the educational opportunities for offspring of these families. While the purpose of this study is to understand how the interpretation and implementation of the Migrant Education Policy across four distinct policy levels in Missouri, it is first necessary to review the prior scholarly research on migrant students to situate this study.

Historical Review on Migrant Farmworker Policies

Contextualizing migrant workers in the United States from a historical perspective is necessary to establish the necessity for federal policies and practices to address disparate experiences, particularly educational experiences, for this population. Historically, a surge of migrant workers in the United States surfaces after the Civil War when Southern Farmers needed laborers and tenant farmers to pick crops. These roles, prior to the Civil War, were completed by slaves. Following the Emancipation Proclamation, legal action to abolish slavery in the 1860s created a gap in the workforce for large farms and plantations. Owners of these properties associated these crops with income and needed to find workers to harvest crops. The economy of necessity was resolved by replacing one population with another. Triplett (2004) reported that in the 1860s, the fields of California filled with approximately 200,000 Chinese men and women.

Additionally, approximately 55,000 Mexican immigrants worked in the cattle ranches of the Southwest and the fruit orchards in California. The populations met an immediate need in the workforce, but World War I generated another shortage of available workers because many of the men, particularly American men, went to Europe to fight in the war (Triplett, 2004). As a result, Congress passed the Immigration and Nationality Act (INA) of 1917. This Act established a legal process for hiring workers from other countries to meet domestic needs. Specifically, 73,000 Mexican workers (National Center for Farmworker Health (NCFH), Inc., “History,” 2014) were brought into the country to fulfill labor needs; however, hiring laborers outlined through this act did not account for adequate work conditions. Consistent complaints by Mexican laborers who came to the United States to work were so widespread that the Mexican government issued Article 123 of the Mexican Political Constitution in 1917 (Fitzgerald, 2011; Marentes & Marentes, 1999). Based on the circumstances described by Mexican workers in the United States, Article 123 outlined an expectation that ranch employers from the United States needed to provide Mexican workers a contract that specified the rate of pay, work schedule, and number of hours, and place of employment (Marentes & Marentes, 1999). While these policies influenced the work environment for Mexican workers, and US ranchers this practice would not remain status quo. Seven years later, in 1924, more changes took place in the United States that directly affected the availability of the Mexican laborers. In 1924, the United States passed the Labor Appropriation Act and one of the specific outcomes of this law established the Border Patrol (U.S. Customs and Border Protection, “History,” n.d). The time between the initial law, that produced opportunities for Mexican people to work in the United States and the creation of the Border Patrol, reflected a change in American attitudes toward immigrants. Quickly

following the Labor Appropriation Act and putting the Border Patrol in place, the United States experienced a major economic shift with the onset of the Depression in 1929. The financial implications associated with the Depression for the United States also created implications for Mexican workers. In 1929, the United States initiated a visa requirement for all Mexican migrant farmworkers (Gratton & Merchant, 2013; Massey, 1999) and identified limits for the number of migrant workers entering the United States (Massey, 1995). Because of the limits on number of Mexican laborers, many immigrants lost their jobs. This forced deportation of Mexican immigrants and Mexican-American citizens created openings in the agricultural workforce; however, domestic workers were initially reluctant to fill these vacated migratory positions until the Dust Bowl left them with little choice (NCFH, "History," 2014).

The onset of the Depression in 1929 that continued through the 1930s resulted in immigrant farmworkers out of jobs. Many American farmers were forced off their farms either by foreclosure or by the devastation of the Dust Bowl. American farmers not only lost access to workers for their land, but the environmental conditions shifted because of the Dust Bowl. The situation drove many farmers west toward California to work in the fields and orchards, creating the new face of migrant laborers in the United States (NCFH, "History," 2014). This was more than just an isolated group of farmers; there are examples from literature of that time highlighting the plight of migrant farmworkers. One example is *The Grapes of Wrath* by John Steinbeck where the author focused on farmworkers from Oklahoma and the conditions under which they worked (NCFH, "History," 2014). The plight of farmworkers yielded a legislative response to provide aid for displaced Midwestern farmers. An intentional effort to generate more agricultural jobs for *native-born* (white) citizens was part of the governmental action.

Specifically, the Immigration and Naturalization Service worked with local authorities to, “deport Mexican immigrants and Mexican-American citizens by the thousands. In all, more than 400,000 ‘repatriados’ were deported” (NCFH, “History,” 2014, para 8). Because of the aforementioned federal legal acts, not only were Mexican laborers deported, those who remained in the United States were required to obtain visas and those that did not have proof of secured employment were denied entry (Gratton & Merchant, 2013; Marentes & Marentes, 1999; Massey, 1995).

As the years passed, the United States government enacted more changes to migrant farmworker policy. The beginning of World War II signified a shift in the sentiment of the American population toward Mexican farmworkers rooted in a need to expand the workforce due to sending native-born men off to war in a similar pattern to World War I (Calavita, 2010; Driscoll, 1999; Gratton & Merchant, 2013; Marentes & Marentes, 1999). The legislative actions over the years of more than half a century indicate a cyclical pattern based on the internal needs of the domestic community (Gratton & Merchant, 2013; Marentes & Marentes, 1999).

One example of policies in 1942 that contradicted earlier legislation included the Bracero Program. Mexican migrants were necessary to feed the soldiers and the country (Calavita, 2010; Driscoll, 1999) and resulted in the development of this program creating a legal avenue for Mexicans to work as migrant workers in the United States (Triplett, 2004). When the war ended and native men returned from war, the United States no longer needed the Mexican farmworkers. Therefore, policies made it more difficult for Mexican laborers to remain in the U.S. (Calavita, 2010, Triplett, 2004). This established a pattern of pushing Mexican workers away when they not needed anymore and then enticing them back into the workforce when local workers were

unavailable or unwilling. The next example of this policy shift happened again when the United States entered the Korean War. However, in 1964 the Bracero Program ended again because of pressure from organized labor and other interested parties (Reichert & Massey, 1980; Triplett, 2004). One outcome of the Bracero Program was the migration pattern from Mexico to the various parts of the United States as planting and harvesting needs emerged; however, once the work was finished, these laborers returned to Mexico. The strength or weakness of the economy drove these cyclical patterns of migration (Gratton & Merchant, 2013; Marentes & Marentes, 1999; Massey, 1995, 1999; Triplett, 2004).

Although the Bracero Program ended, as previously mentioned, the need for migrant workers continued to be economically driven instead of legally driven. Decades later, the on-going cycles of migrant workers persisted, creating state laws like the Agricultural Labor Relations Act passed in 1975 in California, which granted rights to farmworkers in California. The federal government followed suit in 1983 when Congress passed the Migrant and Seasonal Agricultural Worker Protection Act. Three years later, the Immigration Reform and Control Act penalized employers who hired undocumented workers as well as granted amnesty to millions of undocumented workers. As a result, many farmworkers who received amnesty were eligible for work in other sectors, seeking opportunities in manufacturing due to higher wages, and consequently produced a shortage of farmworkers thus increasing new undocumented workers into the system (Triplett, 2004).

Historical Laws and Policies Influencing Migrant Families and Children

The abovementioned historical context about migrant workers illustrates how policies and legislation in the United States over the last century indicate a governmental sensitivity to

support marginalized migrant workers; however, this support also waived based on the needs of the U.S. economy. The migrant and labor laws were about addressing the labor environment, but did not consider the family members in these laws (Reichart & Massey, 1980). As these children came into the country, there was a need to find a space in U.S. schools for them. However, there were barriers influencing the seamless integration of this population including, frequent moves (for parents to find work), the children were put to work in the field or orchards, and the laws did not protect children or force schools to provide access (Triplett, 2004).

Specifically, the laws were designed to protect the adult laborers, and did not account for children and their needs. For example, children in the agricultural sector were exempt from early child labor laws. The differentiations between agricultural and nonagricultural labor laws for children remain separate to this day. Child labor laws specify age limitations on children working on farms under the age of 12 and under the age of 14 for children in the business sector (with exceptions around television and radio) (Mayer, 2013). The economic base of the community, as either agricultural or non-agricultural, directly relates to the educational system. Observable outcomes included timelines for academic years and rules to reflect the best needs of the community. For example, migrants, as well as agriculture children, often started the school year weeks or even months after the school year had started in order to meet the work demands. The work expectations for these children, and subsequent delay, to start the school year placed these students at a perpetual disadvantage each year leading to a cumulative problem (Green, 2003; Kandel, 2008; Triplett, 2004; Romanowski, 2003).

Summary of Historical Policies

While this historical review provides context to the disparities experienced by migrant farmworkers, and their children, it also highlights the governmental legislation and policies enacted over the last hundred years. The governmental actions, typically driven by the strength of the economy and needs of the country at that time, were often cyclical and restrictive. The United States Government first recognized the educational difficulties and disparities the children of migrant farmworkers experienced in 1965 with the enactment of the Title I of the Elementary and Secondary Education Act, also known as the Migrant Education Program (MEP). The basis of this study is the Migrant Education Policy; however, it is not the only federal policy assisting migrant students.

Current Federal Policies Assisting Migrant Students

Currently, there are four federal policies assisting migrant students. Prior to the enactment and implementation of these federal policies, the onus of defining and creating access for all students was located at the school district level (Branz-Spall & Wright, 2004; Branz-Spall, Rosenthal, & Wright, 2003)

The Migrant Education Program (MEP)

The first policy is the Migrant Education Program (MEP) and the goal for this policy is to provide educational and social services to children and their families to address barriers in the educational process and increase their chance for success. The MEP, authorized by Title I of the Elementary and Secondary Education Act (ESEA) of 1965 and reauthorized, most recently, by the No Child Left Behind Act (NCLB) of 2001, provides grants to state education agencies. The MEP, through the state education agencies and local school districts, seeks to accomplish six goals (or outcomes): (1) improve migrant children's school readiness; (2) promote equal access

to educational opportunities; (3) increase parental involvement; (4) provide educator professional development; (5) promote technological implementation of migrant students' school records to facilitate between-school transfers; and (6) increase graduation rates of migrant students (Title I, Part C Draft Non-Regulatory Guidance, 2010). Eligibility for these services is contingent upon a person/child adhering to a definition of migrant. Title I-C, sections 1115(b)(1)(A) and 1309(2) and section 200.18(d) define a migratory child as:

a child under 22 years of age who is a migrant agricultural worker or fisher, or who has a parent, spouse, or guardian who is a migrant agricultural worker, and who has moved across school district boundaries within the previous 36 months in order to obtain temporary or seasonal employment in agricultural or fishing work – (A) has moved from one school district or another; (B) in a State that is comprised of a single school district, has moved from one administrative area to another within such district; or (C) resides in a school district of more than 15,000 square miles, and migrates a distance of 20 miles or more to a temporary residence to engage in fishing activity.

Recently, in 2008, the federal government revised aspects of the regulatory migrant policy; specifically, changing the definition of *temporary employment*. Prior to 2008, the basis for temporary employment was a qualified move within three years. The revision states that temporary employment is classified as less than 12 months. “It may include employment that is constant and available year-round only if the state documents that, given the nature of the work, virtually no workers remained employed by the same employer more than 12 months” (Improving the Academic Achievement of the Disadvantaged; Migrant Education Program; Final Rule, 2008). This change applies specifically to migrants and their families that work in

processing plants. While the mission of the MEP is to promote equal access and academic success, this change in the regulation appears to have the reverse effect as can be seen in Tables 3 through 6 in Appendix A. Although the most recent data about how many migrant students are in Missouri's schools is not publicly available, there is a decrease in the amount of migrant funding. Since the basis of the funding is on the number of migrant students, arguably a decline in funding means a decline in the number of migrant students ("2012-2013 Final Title I.C Allocations," 2013; "2013-2014 Final Title I.C Allocations," 2014).

Healthy, Hunger-Free Kids Act of 2010

The Healthy, Hunger-Free Kids Act of 2010 was originally established as the Commodity Donation Program of 1936 that used crop surpluses to provide meals at school for students who could not afford them. Research shows the detriment of hunger on academic success and argues that food insufficiency (hunger) affects children's ability to learn (Tarras, 2005). While more recently cited as a factor influencing the educational experience for children, the governmental action to address hunger in school-aged children started much earlier.

In 1946, Congress passed the National School Lunch Act to establish a permanent, federally funded school lunch program that also strived to improve child nutrition. Since then, it has expanded to include free and reduced breakfast, after-school snacks, and summer meal programs (New American Foundation, "Federal School Nutrition Programs," 2014). Students whose families' income is 130% below the annual income poverty level guidelines are entitled to free lunches. The majority of migrant students live in extreme poverty (Green, 2003; Kandel, 2008) and are, therefore, automatically eligible for free and reduced lunch (Kandel, 2008).

The free and reduced school lunch program (FRPL) is often used as a poverty or socio-economic status indicator by schools, researchers, and government offices. This metric determines eligibility for Title I funds while allowing the U.S. government to measure the NCLB's Adequate Yearly Progress (AYP) for this pre-determined subgroup of children. This program ensures that migrant students received at least one nutritious meal a day and in the fiscal year 2013, more than five billion lunches were served to 31 million students across the U.S. (New American Foundation, "Federal School Nutrition Programs," 2014).

Equal Educational Opportunities Act of 1974

Section 1703(f) of the Equal Education Opportunities Act of 1974 "requires state educational agencies (SEAs) and school districts to take action to overcome language barriers that impede English Language Learner (ELL) students from participating equally in school districts' educational programs" (Justice "Ed Opportunities," n.d., para 8). Multiple court cases elucidated the importance of embedding this policy in schools for ELL students. The first example was *Castaneda v. Pickard* (1981) where a three-test tool determined if schools denied equal education opportunities to ELL students. This tool defines an acceptable program for ELL students: (1) uses a curriculum grounded in research and recognized by experts in the field; (2) the program and/or methods used are effective in delivering the curriculum; and (3) the program is successful in help ELL students overcome their language barriers.

Another example argued is in the case of *Plyler v. Doe* (1982). During this case, immigrant and undocumented children could not be denied access to public education. *Plyler v. Doe* (1982) is applicable to migrant students because, as Kandel (2008) argued, at least 50% of migrant farmworkers are undocumented. While the number and percentage of undocumented

migrant students is unknown, it is reasonable to assume that at least a portion of these children fall into this category. The final court case I reference is *Flores v. Arizona* (2000) where it is argued that educational programs must be properly funded and adequate teachers available to support a successful academic experience of ELL students.

All of the above examples of court cases reinforce the importance of equal access and opportunities for ELL students in the American school system. It is necessary to recognize that migrant students, like other ELL students, may not be denied access to equitable education opportunities because of their minority language status.

Language Instruction for Limited English Proficient and Immigrant Students Act

The Language Instruction for Limited English Proficient and Immigrant Students Act is Title III of the Elementary and Secondary Education Act. The Office of English Language Acquisition, Language Enhancement, and Academic Achievement governs this policy for Limited English Proficient Students (OELA). The OELA provides grants and assistance to aid schools in helping ELLs develop proficiency and success academically using the English language (OELA, 2015). Part of the OELA mission focuses on administering discretionary grants that:

- (1) Help English learners develop proficiency in English and meet high standards for academic achievement and;
- (2) Help teachers and other educational personnel meet high professional qualifications to better serve English learners. (OELA “Mission,” 2015, para 4).

In addition, the OELA supports research to inform policy as well as disseminates information about programs to meet the needs of the ELL (OELA “Mission,” 2015). This is a critical area of support for migrant farmworker children as many of them are not native English speakers

(Kandel, 2008), and English language acquisition makes academic success for these children possible.

New Latino Diaspora

Over the last two decades, a population shift is visible through an increase of a Latino population for communities that are small, rural, and mostly white and are located in the Midwest and Southeastern parts of the United States (Clotfelter, Ladd, & Vigdor, 2011). Other communities in the U.S. (e.g., California, Texas, New Mexico, Arizona, and Florida) also experienced a growth in the Latino population, may not be as noticeable due to the pre-existing Latino population (Brown & Lopez, 2013). Despite an increase in the Latino community in these states, the basis of the growth is on the number of native-born Latinos (Clotfelter et al., 2011; Passel & Cohn, 2014). Other states such as Idaho, Nebraska, North Carolina, and Virginia show an increase in their Latino population, however, these states differ from California, Texas, New Mexico, Arizona, and Florida because their increase is foreign-born Latinos (Passel & Cohn, 2014).

Historically, population moves were associated with the expansion of the traditionally established Latino communities of the coast and Border States. More recently, population moves and agricultural work near meatpacking facilities, allowed new immigrants to find jobs and establish communities in areas of the country where the general population is small and jobs are plentiful (Kipp, 2011). These shifts and movements of the Latino population are part of the *New Latino Diaspora* throughout the country (Hamann & Harklau, 2010).

The New Latino Diaspora (NLD) refers to the increased numbers of Latinos settling, temporarily and permanently, in areas of the US that were not considered traditional Latino

settlements (Hamann & Harklau, 2010; Hamann, Wortham, & Murillo, 2002). Traditional Latino settlements are located in states like Arizona, California, Florida, New Mexico, New York, Texas, Colorado, Illinois, and New Jersey (Hamann & Harklau, 2010). Latino immigrants followed jobs in industries like agriculture, manufacturing, landscaping, and poultry and meat processing, which are often found in rural areas in these *new* settings (Artz, Jackson, & Orazem, 2010; Burnett & Luebbering, 2007; Dozi & Valdivia, 2005; Hamann & Harklau, 2010; Lazos & Jeanetta, 2002; Wortham, Clonan-Roy, Link, & Martinez, 2013). The *new* Latino settlements are found in states in the southeast and Midwest, like North Carolina, Georgia, Kansas, Arkansas, and Indiana to name a few (Hamann & Harklau, 2010).

Research on the new Latino diaspora considers not only the changing geographic locations, but also the cultural implications (Hamann, Wortham & Murillo, 2002; Villenas, 2007). This body of literature recognizes the identity building that occurs for these Latinos as they merge a pan-Latino identity with a specific national identity (i.e. Mexican, Peruvian, Bolivian, and Cuban) (Hamann & Harklau, 2010; Villenas, 2007). Additionally, these individuals must define and remake their identities in new settings that sometimes view these newcomers as unwelcome immigrants (Hamann, Wortham, & Murillo, 2002; Villenas, 2007).

In comparing the new locations to the established locations, Hamann and Harklau (2010) suggest that Latinos in these new locations have very different educational experiences. These new locations often experience rapid growth of the Latina/o population, particularly the school age students whose households primarily speak Spanish. This rapid demographic shift often requires schools' to improvise in their responses to accommodate language issues for the students and their families. Districts may not have certified ELL teachers or bilingual

individuals to communicate with the families (Hamann & Harklau, 2010; Hamann, Wortham, & Murillo, 2002). Additionally, Latinos are meeting opposition from the community and inequitable educational efforts in their new locations (Hamann & Harklau, 2010; Hamann, Wortham, & Murillo, 2002). However, many Latino families believe the educational system in their new location to be better than their previous location because of less violence (Hamann & Harklau, 2010).

Meatpacking and Processing Plants in the New Latino Diaspora

Economic growth is taking place in industries, such as meatpacking, and tends to attract a number of migrant and immigrant workers; subsequently becoming a *new* community and part of the new Latino diaspora (Artz, Jackson, & Orazem, 2010; Burnett & Luebbering, 2007; Dozi & Valdivia, 2005; Hamann, Wortham, & Murillo, 2002; Lazos & Jeanetta, 2002). As is inherent in the term *migrant*, immigrants tend to follow plentiful opportunities in industrial jobs that require little to no English and no special skills (Gouveia & Saenz, 2000; Kipp, 2011). Although the jobs were plentiful, the jobs were not glamorous and often were synonymous with long hours in poor conditions for minimal pay (Kipp, 2011). These jobs, since they were often not highly sought after, resulted in fewer barriers to employment (Clotfelter et al., 2011; Kipp, 2011). Starting in the second half of the 20th century, family farms were replaced by large corporate farms and many industries moved their manufacturing jobs overseas (Gouveia & Saenz, 2000; Kipp, 2011) and the meatpacking industry experienced significant and radical changes in the way they operated and where they were located. Packing plants moved from major cities like Chicago, Omaha, and St. Louis to rural areas in the Midwest (Clotfelter et al., 2011; Gouveia & Saenz, 2000; Kipp, 2011). To illustrate how the availability of jobs translated to an influx of

Latino population, in 1964 the Iowa Beef Packers opened a plant in a rural, mostly white town of 12,000 people in northern Nebraska offering 500 new jobs. Eventually the plant grew to over 2000 employees. In 36 years, this town almost doubled in size and diversified with 25% of the population identifying as Latino (Kipp, 2011).

Other rural communities across the Midwest, including Missouri, experienced a similar transformation in their population and inclusion of a Latino community. These towns are re-defined by new immigrants who arrived in their community by following the job opportunities and the promise of a better life than what they had in their home country. Some of the benefits of these jobs included communities with educational opportunities, healthcare, and social service resources (Clotfelter et al., 2011; Kipp, 2011). Some of the contributions from the new community members included establishing businesses, churches, neighborhoods, and services (Clotfelter et al., 2011; Flores et al., 2011; Gouveia & Saenz, 2000; Kipp, 2011). Missouri is one of the states being redefined as part of the new Latino diaspora as migrant workers and other immigrants are moving to communities where meatpacking plants are located (Clotfelter et al., 2011; Flores et al., 2011; Gouveia & Saenz, 2000).

Missouri as Part of the New Latino Diaspora

The number of migrant children in Missouri is substantially smaller than other states such as California, Kansas, Oklahoma, and Arkansas (OME, Data Resources, 2014). For those families who lived in Missouri, many of them worked in seasonal positions along the Mississippi Delta (Burnett & Luebbering, 2007). Job opportunities for migrants decreased due to technological expansions in crop production and harvesting (Artz, Jackson & Orazem, 2010; Burnett & Luebbering, 2007; Dozi & Valdivia, 2005; Lazos & Jeanetta, 2002).

As noted previously, educational systems located in states where migrant populations exist are eligible to receive federal funding. The basis of school funding allocations is on a classification system including three primary categories: Crop production; livestock production; and other agricultural establishments (Gouwens, 2001). Within the state of Missouri, mostly rural areas, the food production facilities include Tyson Foods (chicken), Triumph Foods (pork), and Farmland Foods (pork). Corresponding with these different food production facilities, the affiliated schools are the educational systems with the largest number of migrant children. These districts include Sullivan (Milan; Premium Standard Farms), Pettis (Sedalia; Tyson), McDonald (Noel; Tyson and Simmons), Barry (Monett; Tyson), Moniteau (California; Cargill), and Buchanan (St. Joseph; Triumph Foods) (“2012-2013 Final Title I.C Allocations,” 2013; “2013-2014 Final Title I.C Allocations,” 2014; Piacentini, Valentine, & Cockrell, 2007).

To show how the meatpacking plants are influencing the population of Missouri, the Latino population tripled from 1990 (1.2%) to 2011 (3.6%) (American Immigration Council, 2013). According to the Missouri Economic Research and Information center (2012), changes in the population census since 1990 indicate more than thirty Missouri counties doubled the size of their Latino population within the last decade and several counties experienced a growth of greater than 500%.

Migrant Students’ Social, Cultural, and Educational Disparities

As previously mentioned, the frequent mobility of migrant students creates not only educational disparities, but also social and cultural disadvantages for this student population. While English language instruction is necessary for this predominately Spanish speaking

population (Kandel, 2008), migrant students' greater needs are the basic, fundamental necessities (i.e. food and shelter).

Mobility and Poverty

Migrant children face excessive hardships because they typically live in extreme poverty (Branz-Spall, Rosenthal, & Wright, 2003). The combining effect of frequent mobility and extreme poverty results in many migrant families struggling to meet basic, fundamental necessities. As such, one of the most pressing challenges they face are access to the basic and fundamental necessities that most people take for granted daily: food, shelter, and health (Ashiabi, 2005; Green, 2003; Keogh et al., 2006; Valenzuela et al., 2012). Migrant children are more at-risk and frequently experience health problems due to poor nutrition and inadequate housing. As a result migrant children are at greater risk to have growth delays and learning disabilities than white, middle-class children (Solis, 2004). This is not too different from other children living in extreme poverty. Research on children living in extreme poverty, which includes migrant children, indicates a higher than average school drop-out rate, a lower than average reading ability and a higher than average probability of living in poverty in adulthood (Balfanz, Fox, Bridgeland, & McNaught, 2009; Hernandez & Napierala, 2014; Murnane, 2013; Solis, 2004).

Migrant families tend to “travel light,” leaving behind personal belongings and possessions when they move to a new location (Salinas, 2013). Additionally, locating shelter and healthcare can be difficult in new locations where they have not yet established networks. This includes locating and accessing organizations in communities that will aid them in securing housing and services in locations where they may only live for a few weeks or months (Bubolz,

2001; Browne-Yung, Ziersch, & Baum, 2013; Salinas, 2013). As a result, students may not have the proper clothing necessary for school when they arrive at their new location (Salinas, 2013). School districts are able to aid migrant students and their families in finding and accessing social services in the community. Using their Title I.C funding, schools are able to provide items like clothing and glasses (Title I, Part C Draft Non-Regulatory Guidance, 2010).

Language Acquisition Needs

English language acquisition is important for migrant children because English comprehension is the basis for academic success and literacy. Acquiring English language comprehension is a necessity for migrant students (Duran, 2003; Golden, Harris, Mercado-Garcia, Floch, & O'Day, 2014; Gouwens, 2001). Additionally, many migrant (and non-native English speaking) children act as cultural and language brokers for their parents in situations outside of the home with schools, government organizations, healthcare providers and service providers, just to name a few (Morales, Yakushko, & Castro, 2012).

Based on the political climate during their initial creation and enactment, the language policies and programs vary from school to school. These policies affect migrant students, as well as other language minority students. These students must acquire literacy and fluency in English to be “academically successful” in the educational arena (Alanis, 2004; Garcia & Kleifgen, 2010; Hornberger, 2005; NCTE, 2008). The language policies determined by the states and the districts may influence migrant students’ ability to attain English. When the student is frequently moving from district to district and state to state, acquiring the new language can be even more difficult because of the differences in curriculums, policies, and different teachers (Alanis, 2004; Green, 2003; Valenzuela et al., 2012).

Social Isolation

Due to their frequent mobility, migrant students can also feel a sense of social and cultural isolation. Migrant students, like other minority students, need to feel a connection to their teachers, peers, school and curriculum to achieve academic success. Delpit and Dowdy (2002) argue that schools and teachers must connect with the students, make the language instruction interesting and relevant and find ways to form connections between themselves, the students and the school. Connections are the key that keeps students from feeling socially isolated. Gouwens (2001) explains that the migrant students are rarely in school long enough to form relationships with other children that will lead to their feeling of belonging. Instead, many migrant children feel isolated from their peers and their schools (Gouwens, 2001; Salinas, 2013). This isolation influences a student's ability to be successful and achieve in schools (Perreira, Fuligni, & Potochnick, 2010). Moreover, there are cultural differences between migrant students and their white, mainstream peers regarding the role of family and parental involvement in schools (Lee & Bowen, 2006; Parra-Cardona et al., 2006; Snell, Miguel & East, 2009). These cultural differences between this population and schools and in some instances, the society can cause friction between the families and the schools (Perreira et al., 2010). Sometimes these differences can result in students feeling marginalized or discriminated against in schools (Perreira et al., 2010; Rosenbloom & Way, 2004; Valenzuela, 1999).

Valenzuela et al. (2012) argue that schools, including policies, practices, school staff and teachers “ignore or devalue the home culture and linguistic knowledge of Mexican origin students, thus effectively stripping them of much of the social and cultural capital, potential, and perspective that they could bring into the classroom” (Valenzuela et al., 2012, p. 26). This

creates more tension between the migrant families and the schools that furthers the students' sense of social isolation. Rumbaut (1997) and Valenzuela et al. (2012) further argue that assimilation and the expectation to assimilate tends to have negative and lasting consequences for immigrant students, especially if the result is the abandonment of the native language and ethnic ties. This creates conflict for the migrant student because family is considered to be extremely important to this population (Parra-Cardona et al., 2006), as is the retention of their own culture and values (Velasquez, 1996). The push by society for migrant students (and their families) to assimilate to the mainstream norms creates conflict and tension around which values are important and the implications cause migrant students to feel socially isolated from the mainstream peers (Degarmo & Martinez, 2006).

Creating an environment that is welcoming and supportive of migrant student culture and values is a step to combating the social isolation that many immigrant students experience (Degarmo & Martinez, 2006; Perreira, Chapman, & Livas-Stein, 2006). This welcoming and accepting environment promotes academic success and provides for equitable access that non-immigrant students take for granted. This environment is necessary to promote learning for the students, but also promotes acceptance of the family. Furthermore, Perreira, Fuligni, and Potochnick (2010) compared Latino social acceptance in North Carolina as compared to Los Angeles. They examined social acceptance in the context of daily positive experiences, positive treatment by peers, and encouragement by teachers, and other adults at their schools. Perreira, Fuligni, and Potochnick (2010) found that social acceptance increased student academic motivations and decreased discrimination felt by the students. Additionally, they found that social acceptance affects academic achievement directly and indirectly.

Summary of Migrant Students' Social and Cultural Disparities

While the focus of this study is on the implementation of the MEP, understanding and recognizing the role of social and cultural disparities is necessary because of several of the MEP's stated policy goals. If the expectation for states and districts is to increase the school readiness and increase the graduate rates of migrant students, for example, creating and fostering a welcoming and positive environment is necessary. This environment must combat some of the cultural, social, and educational disparities of migrants and must be a component of the policy implementation understanding, because migrant students are judged by the same benchmarks as all other students.

Putting the Pieces Together

From this review of the literature, the following key areas relevant to this study's focus on the implementation of the migrant education policy are historical and current policies affecting migrant students, the new Latino diaspora, and migrant students' social, cultural, and educational disparities. Many minority students, including other immigrant and language-minority students, share common challenges. Language acquisition (Duran, 2003; Golden et al., 2014; Gouwens, 2001; Valenzuela et al., 2012), cultural differences from the dominant culture norm (Green, 2003; Lopez, Scribner, & Mahitivanichcha, 2001; Valencia & Black, 2002) and social isolation (Lee & Bowen, 2006; Parra-Cardona et al., 2006; Perreira, Fuligni, & Potochnick, 2010; Snell, Miguel & East, 2009) are common among many minority students. The differences between these experiences for migrant students and other minority students is that these compounded experiences make it potentially more difficult for schools to address, because of the families' constant mobility. The importance of understanding these challenges is to

highlight how schools combat them, provide equitable access, and promote academic success for the migrant student. Additionally, understanding these challenges aids in understanding how the various policy levels implement the MEP.

The next chapter will focus on the theoretical framework that guided this examination of the implementation of the Migrant Education Policy across multiple policy levels from the macro federal level to the micro school district level. The theoretical framework guiding this study is policy implementation theory. This framework also allowed the study to investigate how the policy changed and why those changes are important in implementing the policy in Missouri and the five school districts (Honig, 2006a; McLaughlin, 1987).

CHAPTER THREE: THEORETICAL FRAMEWORK

This chapter focuses on the theoretical framework that drives this study. I applied policy implementation theory in this study, because it helps examine the implementation of migrant education policies across various policy levels from the macro federal level to the micro school district level. It is important to consider these multiple levels in examining the implementation of the migrant education policy because it takes into consideration how the policy changes and the variations in the implementation as it moves through the levels to its final implementation at the micro district level. This framework also allowed the study to investigate how the policy changes and why those changes are important in implementing the policy Missouri and the five school districts (Honig, 2006a; McLaughlin, 1987; Werts & Brewer, 2015; Young & Lewis, 2015).

I examined the macro (federal) level of the migrant education policy from the perspective of the Office of Migrant Education. In moving to the next levels, I examined the intermediate level from two perspectives: the state level and the regional level. The state level was from the perspective of the Missouri Department of Elementary and Secondary Education's Office of Migrant Education, ELL, Immigrant & Refugee (MELL). I examined the regional perspective from individuals working at the Regional Development Centers. Finally, individuals from five Missouri school districts represented the perspective of the micro level. In this study, individuals at the district level are the street-level bureaucrats that make the final interpretation and implementation of the Migrant Education Policy. Street-level bureaucrats are the policy enactors who work with the target population. They use their discretion to implement policy

based on the local context, their beliefs, and their available resources (Birkland, 2011; Honig, 2006b; Lipsky, 1979, 1980, 2010; McLaughlin, 1987; Weatherly & Lipsky, 1977).

When talking about public policy, Kraft and Furlong (2013) state that public policy is the purposeful action taken by the government to address and respond to public problems.

Essentially, public policy are the intentions, goals, plans, programs and choices that are presented in the form of laws, regulations, executive orders and judicial rulings (Birkland, 2011; Kraft & Furlong, 2013).

The Policy Process

There are multiple ways to view public policy analysis (Birkland, 2011; Kraft & Furlong, 2013). It can mean the breaking down of the issue or problem into its most basic parts to understand it better. It can also be the studying of causes and consequences of decisions. Finally, it can be an examination of the policy, the policy process, or both. When applying these definitions to education, the purpose of analysis is mostly to conduct policy or program evaluations to determine if the policy or program is working well and achieving its goals and objectives (Birkland, 2011; Fowler, 2013; Kraft & Furlong, 2013). While this study did not seek to specifically determine success or failure in meeting the migrant education policy goals, it did seek to understand how the policy is being implemented across four distinct policy levels; therefore, emphasizing how the policy interpretation, focus and priority changes as it moves through each level. In doing so, gaps in the implementation as compared to the federal outcomes were identified.

The policy process consists of six stages: (1) agenda setting; (2) policy formation; (3) policy legitimation; (4) policy implementation; (5) policy evaluation; (6) policy change

(Birkland, 2011; Fowler, 2013; Kraft & Furlong, 2013). This process is cyclical and continuous. In the policy agenda stage, a problem is defined that demands attention and makes it onto a political agenda. In the policy formation stage, the policy is designed and drafted with goals and strategies to achieve the goals. In the policy legitimation stage, the policy gets political support and formal enactment that includes justification and rationale for the action. In the policy implementation stage, the policy is given funding, if applicable, and put into effect by the relevant agencies. The implementation stage is an important part of the process, because this stage represents the organizational activities directed to carrying out the adopted policy (Fowler, 2013). In the policy evaluation stage, the policy is evaluated and assessed for effects, including its success and failures. In the final stage, policy change, the policy is modified, as necessary, based on new information or a change in the political environment. If a mismatch exists between the needs of the target population and the policy or program, the policy should begin the process cycle at the “agenda stage” in order to make appropriate changes (Birkland, 2011; Kraft & Furlong, 2013).

For this study, the implementation stage was the chosen stage of focus because I sought to understand what happened to the migrant education policy during this stage of the policy process. In this stage, formal implementers and intermediaries are the major actors in implementing the policy. The formal implementers are the government officials “who have the legal authority to see that a new policy is put into effect” (Fowler, 2013, p. 242). In this study, the formal implementers were the Office of Migrant Education (OME) at the federal (macro) level. Formal implementers give the intermediary implementers the authority and responsibility to help with the policy implementation. Intermediaries are the people and organizations who

operate between the formal implementers and the street-level bureaucrats that serve as the policy impact point on the target population (Fowler, 2013). In this study, the state Office of Migrant Education, ELL, Immigrant & Refugee (MELL) and the Regional Professional Development Centers (RPDCs) were the intermediaries between the formal policy implementers at the federal (macro) level and street-level bureaucrats at the district (micro) level. This study sought to understand how the migrant education policy changes and adapts as it moves from the macro (federal) level to the micro (district) level. With this in mind, the next section begins an analysis of implementation research on education policy. This understanding is important because it highlights similarities and differences in the policy interpretation and implementation priorities and focus at each of the distinct policy levels.

Policy Implementation Research

The implementation research conducted in this study is nestled in the contemporary generation of policy implementation research. This study focused on understanding how the migrant education policy changes and adapts as it moves from the macro (federal) level to the micro (local) level. The policy adaptations and changes at each of the distinct policy implementation levels reflect the policy priorities and focus at each of the policy levels. Policy implementation research began in the early 1970s and has four distinct periods.

First Generation of Implementation Research

The first generation of policy implementation research focused on a top-down orientation that carried the assumption that policy makers developed policies and implementers carried them out (Birkland, 2011; Honig, 2006a). Implementation was viewed as a simple transmission of the policy and its objectives, not taking into account the implementers' beliefs and desires (Birkland,

2011; Honig, 2006a). McLaughlin (1987) argued that this first generation of implementation research that began in the 1970s highlighted how policy implementation studies often showed how policy implementation failed. Birkland (2011) and Fowler (2013) describe this idea of failed implementation to mean that the studies of that time highlighted how the policy implementations were not meeting the defined policy outcomes and goals. However, the lessons learned from this generation of research include recognition of the impact the local personnel and interests have on policy implementation because local personnel often lacked training and were unaware of what they were supposed to do to implement the policy (Fowler, 2013).

Furthermore, the first generation of implementation research showed how local factors “such as size, intra-organizational relations, commitment, capacity and institutional complexity molded responses to policy” (McLaughlin, 1987, p. 172). This body of research highlighted how differently and important the local interpretations of the problem were in addressing the policy (Fowler, 2013; McLaughlin, 1987). Fowler (2013) argues that there were three primary lessons learned from this generation of policy implementation research. First, local implementers often did not understand what they are supposed to do. Second, implementation required implementers to have skills and knowledge on how to implement the policy that they often did not have. Third, adequately and appropriately implementing the policy required necessary resources (money and time). Fowler (2013) argues that the lessons learned from this generation are important because current policy implementation research still finds similar problems.

Second Generation of Implementation Research

Beginning in the late 1970s, the second generation of implementation research marked the shift from implementation top-down orientations (Birkland, 2011; Fowler, 2013;

McLaughlin, 1987) to longitudinal studies on policy implementation research (Fowler, 2013; Honig, 2006a). This research focused on the importance of policy, people, places and time in the implementation process (Birkland, 2011; Honig, 2006a). Researchers discovered that policies enacted under the Elementary and Secondary Education Act (ESEA) of 1965 were beginning to show progress in their effectiveness during this time because states and districts had had enough time to figure out how to implement these policies (Fowler, 2013). Arguably, the most important result to come from this period was the identification of key influencers in the policy implementation process. These individuals became known as “street-level bureaucrats.” These individuals shape policy in that their work “actually constitute[s] the services ‘delivered’ by the government [in that their] individual decisions ... become, or add up to, agency policy” (Lipsky, 2010, p. 3). Furthermore, street-level bureaucrats are the policy enactors who work with the target population. They use their discretion to implement policy based on the local context, their beliefs, and their available resources (Birkland, 2011; Honig, 2006a; Honig, 2006b; Lipsky, 1979, 1980, 2010; McLaughlin, 1987; Shulman, 1983; Weatherly & Lipsky, 1977). Essentially, the day-to-day practices of the street-level bureaucrats become policy and may, at times, differ from the intentions and outcomes established by the policy documents and formal implementers (Lipsky, 1980). This means that the street-level bureaucrats are putting the policy and its implementation into practice. The recognition of these individuals in this generation differs from the first generation perspectives in that the first generation typically did not recognize the role of these individuals (Birkland, 2011; Fowler, 2013). The primary focus of implementation studies in the second generation were at the school district level (Birkland, 2011; Fowler, 2013; Honig, 2006a).

Additionally, McLaughlin (1987, 2008) argues that both the macro (policy) level and the micro (implementation) level influence the implementation process as implementers try to reconcile defined policy outcomes with the micro level context. As such, the street-level bureaucrats must make discretionary decisions as they adapt the policy from the macro level to the enactors at the micro level. This adaptation by the micro level enactors (street-level bureaucrats) results in changes to the design of the policy and the behavior of the implementers as the new policy takes shape (Fowler, 2013). Furthermore, the basis of successful implementation is on not just individuals' ability to understand the policy outcomes, but also on their will and capacity to implement the policy (Fowler, 2013). As such, the street-level bureaucrats must consider the demands of the policy and their local context in determining how they will implement the policy.

Policy implementation success depends on local capacity, including funding, training, and other such resources (Birkland, 2011; Fowler, 2013; Honig, 2006a; Honig, 2006b; McLaughlin, 1987) and street-level bureaucrats' will and interpretations (Birkland, 2011; Fowler, 2013; Honig, 2006a; Honig, 2006b), specifically the "motivation, and beliefs that underlie an implementer's response to a policy's goals or strategies" (McLaughlin, 1987, p. 172). This is an important piece for policy implementation studies, because it reflects the implementer's examination of the policy's value and/or perceptions on the appropriateness of the planned policy strategy. The role these street-level bureaucrats have in the implementation of a policy is an important component of this study, because it takes into consideration whether or not the Migrant Education Policy's outcomes are consistent from district to district and accounts for the implementation adaptations made by the street-level bureaucrats at the local (micro) level.

Third Generation of Implementation Research

Beginning in the mid-1980s, the third generation of policy implementation research furthered the understanding of the significance of people, places and policies in the implementation process by focusing on policy mandates, incentives, systems change, and capacity building and revealed why policies were more or less effective (Fowler, 2013; Honig, 2006a). McLaughlin (1987) argued that this generation was “integrating the macro world of policy makers with the micro world of individual implementors” (p. 171) by incorporating the macro and micro levels (policymakers and street-level bureaucrats respectively) in ways that accommodate these “multi-level, multi-actor complexities” (p. 177). Additionally, this body of research emphasized a wider range of people, including state education leaders and staff as part of the policy implementation process (Birkland, 2011; Fowler, 2013; Honig, 2006a).

McLaughlin (1987) insisted that policy implementation studies must reflect multi-levels, multi-stages and multi-actors to accurately reflect the way a policy is implemented, including the re-interpreting of priorities of focus of the policy as it is adapted each policy level. This study sought to understand how the multiple levels reinterpreted the Migrant Education Policy, therefore involving multiple policy actors from the federal formal implementers to the state and regional intermediaries to the local district street-level bureaucrats.

In addition, this third generation of policy implementation research introduced the importance of state agencies in the implementation process (Honig, 2006a). Research during this generation revealed that implementation is a negotiated process between the federal government, state agencies, and the local districts in determining policy compliance (Fowler, 2013; Honig, 2006a). Furthermore, this generation of implementation research introduced the importance of

location. Honig (2006a) argues that the importance of geographical location takes into consideration the communities' politics, culture, and history in the way implementers respond to policy directives. These new understandings of the third generation opened the door to the current generation of implementation research.

Contemporary Implementation Research

Beginning in the 1990s, contemporary implementation research moved into a more in-depth look at people, places, and organizations in the implementation process and the implementation priorities (Honig, 2006a; Owens, 2014; Smylie & Evans, 2006). One of the new organizations and people identified in policy implementation, thus far, are policy intermediaries (Honig, 2004, 2006a; McLaughlin, 2006; Owens, 2014; Smylie & Evans, 2006). Policy intermediaries are the people and organizations that are empowered by the formal policy implementers. They serve as the mediators between the formal implementers and the street-level bureaucrats at the policy impact point with the target population (Fowler, 2013). Intermediaries could be state educational agencies, school boards, district personnel, and community organizations to name a few (Fowler, 2013; Owens, 2014).

Some contemporary implementation research elaborates on the third generations' understanding of place and location as fundamental in policy implementation (Honig, 2006a). Contemporary studies focus more on state educational agencies and district offices as central organizations in understanding differences between organizational entities' implementation processes and priorities (Honig, 2006a; Young & Lewis, 2015). Additionally, contemporary research names districts and states in an effort to highlight how implementation unfolds in specific locations and brings attention to the history, culture, and politics that shape and inform

the implementation focus and priorities (Honig, 2006a; Young & Lewis, 2015). While these themes do not reflect all contributions made in contemporary implementation research, they reflect those that are most relevant to this study, specifically the role of policy intermediaries and location.

Implementation Research Summary

Understanding the contemporary generation of implementation research was pivotal to this study, because it aimed to examine the implementation of the Migrant Education Policy from multiple policy levels. The macro level (federal level) provided the perspective of the formal implementers in determining implementation priority and focus. The state and the regional levels provided an intermediary role and perspectives on their implementations priority and focus. Lastly, the micro (district) level, in their role as the street-level bureaucrats, provided perspective on their implementation priority and focus. The policy implementation intermediaries are located within the state of Missouri and reflect Missouri's culture and politics. The street-level bureaucrats, while also located in Missouri, reflect not only Missouri culture, history and politics, but also those of their individual districts and communities. This study took into consideration these various levels and the various implementers that interpret the policy along the way. In doing so, this study examined how the different policy levels interacted in their interpretation and implementation of the Migrant Education Policy.

As the Migrant Education Policy moved from the macro level to the intermediary level to the micro level, the policy implementation framework was used to examine how the policy shifted and changed. How did it shift and change as it moved from the federal level to the state level to the regional level to the local level? Did the shifts influence the identified outcomes and

priorities as outlined by the MEP policy? With this mind, next is brief discussion of how this contemporary generation of policy implementation research considers both the macro (federal) level, the intermediary (state and regional) level, and the micro (local) level.

Migrant Education Policy Implementation in a Policy Implementation Framework

This policy implementation framework was a good fit for this study, because it examined the multiple levels and multiple actors that interpreted and implemented the Migrant Education Policy in Missouri, which allowed this study to uncover how the implementation priorities and focus changed at the various policy levels. It also took into consideration the culture and context of the policy level. It also considered how the culture and context influenced the implementation focus and priority. These theoretical underpinnings allowed this study to uncover how the interpretation and implementation of the Migrant Education Policy at multiple levels developed an understanding of how well the street-level bureaucrats at the district level are meeting the outcomes the policy prescribes. Furthermore, this study shows how five Missouri school districts are responding to the federal policy outcomes like promoting academic achievement, for example, so that migrant students in Missouri are less likely to drop-out and perhaps, more likely to attend post-secondary institutions or perhaps have better and stronger educational experiences. With this in mind, the next section begins an analysis of the implementation of the Migrant Education Policy at the macro level, intermediary level, and micro level.

Macro Level Policy Implementation

Analyzing policy at the macro level provides useful data that includes information about the process and structure of the policy, including its intended outcomes. Contemporary implementation research suggests that understanding the macro level is vital to policy

implementation research because it establishes what the policy is, including its objectives, mandates, incentives, and systems (Fowler, 2013; Honig, 2006a, McLaughlin, 1987, 2006, 2008; Young & Lewis, 2015). Examining the macro level implementation was important to this study because it took into consideration the intentions, outcomes and policy objectives. These considerations were important because they framed the federal policy and established a baseline to compare the micro level adaptations. It also considered the mandates, incentives, systems, and strategies in place to meet the stated goals. As learned from the mistakes of the first generation of policy implementation research, strategies, resources, and systems are important components to successful policy implementation (Fowler, 2013). Hamann, Wortham, and Murillo (2002) argue that policy serves as the gatekeeper and determinant of who has the right to be educated and what that education should look like. For this study, the MEP provided a clear definition of who qualifies as a migrant student, and what goals and outcomes school districts must comply with, while considering the local context where districts operate. In doing so, this study considered the will and desire to implement the policy; the knowledge and skills needed to implement the policy; and the resources available to implement the policy. Examining the MEP defines which expected programs and services school districts are to provide if they are using specifically allocated federal money. In doing so, it identified gaps between the interpretation and implementation of the policy and the stated policy outcomes.

The macro (federal) level establishes the Migrant Education Policy and its outcomes. To understand the macro (federal) level, an examination of the policy language, updated regulations, compliance regulations, and communication of this information to the states is required. Based on the contemporary generation of policy implementation research, understanding the policy

mandates, incentives and systemic changes are necessary to understanding the macro level (Honig, 2006a; McLaughlin, 1987, 2008). Furthermore, it was also necessary to understand the resources provided to accomplish these tasks (Fowler, 2013). Since districts receive federal funds to aid migrant students in achieving academic success, it was necessary to understand the macro level's role and implementation focus and priorities. A component of this study sought to understand just that by investigating the federal level's interpretation and implementation focus and priority of the Migrant Education Policy.

Intermediate Level Policy Implementation

The intermediate level considers perspectives of both the state and the regions. The intermediate levels are the policy intermediaries. Formal implementers give the intermediary implementers the authority and responsibility to help with the policy implementation. Intermediaries are the people and organizations who operate between the formal implementers and the street-level bureaucrats that serve as the policy impact point on the target population (Fowler, 2013). In this study, the state Office of Migrant Education, ELL, Immigrant & Refugee (MELL), and the Regional Professional Development Centers (RPDCs) are the intermediaries between the formal policy implementers at the federal (macro) level and street-level bureaucrats at the district (micro) level. MELL serves as an intermediary between the macro level and the regions and the street-level bureaucrats at the micro level. The regions serve as an intermediary between MELL and the street-level bureaucrats at the micro level.

Intermediaries represent a newer understanding of policy implementation. Honig (2004) defined intermediary organizations as those that operate between the policymakers and the policy implementers (street-level bureaucrats) to affect change. Additionally, she argued that

intermediaries provide a new understanding and new resources, like knowledge, political and social ties, cultural context and an administrative infrastructure that are necessary to implement a policy (Honig, 2004). McLaughlin (2006) further argues that intermediaries serve as resource brokers that have the ability to bridge gaps in the implementation structure because of their expanded knowledge and resources. By having knowledge of both the local context and the larger policy purpose, intermediaries are able to build processes that work for both perspectives (Honig, 2004; McLaughlin, 2006; Owens, 2014).

In this study, MELL's role as an intermediary between the federal government and the regions and districts in Missouri allows MELL to use its knowledge of Missouri's culture and various sub-cultures to better define an implementation focus and priorities. Since the regions serve as intermediaries between MELL and the districts, they are able to use their understanding of MELL's implementation priorities, and their knowledge and relationships with their local school districts to bridge gaps in the implementation process. As a component of this study sought to understand both the state and regions' roles, interpretations, implementation priorities, and focus of the Migrant Education Policy, understanding the role of the intermediaries is necessary, because they bridge the gap between the federal (macro) level policy enactors and the local school district (micro) level street-level bureaucrats.

Micro Level Policy Implementation

What matters in the policy implementation process are the individual and the will to implement the policy (Fowler, 2013; Honig, 2006a; McLaughlin, 1987, 2008). As the MEP moves to the micro level it passes through Missouri Department of Elementary and Secondary Education (DESE), through the Regional Professional Development Centers (RPDC) to the

micro district level. As the policy moves through each of these levels, the policy’s outcomes and objectives may refocus or change all together. By the time the policy gets to its lowest level of implementation, what the focus and priorities are may be completely or partially different (Birkland, 2011; Fowler, 2013; Honig, 2006a; McLaughlin, 1987, 2008). Perhaps the interpretation and understanding of the objectives and/or outcomes are different. Figure 1 below reflects how the implementation of the policy at each of the policy levels.

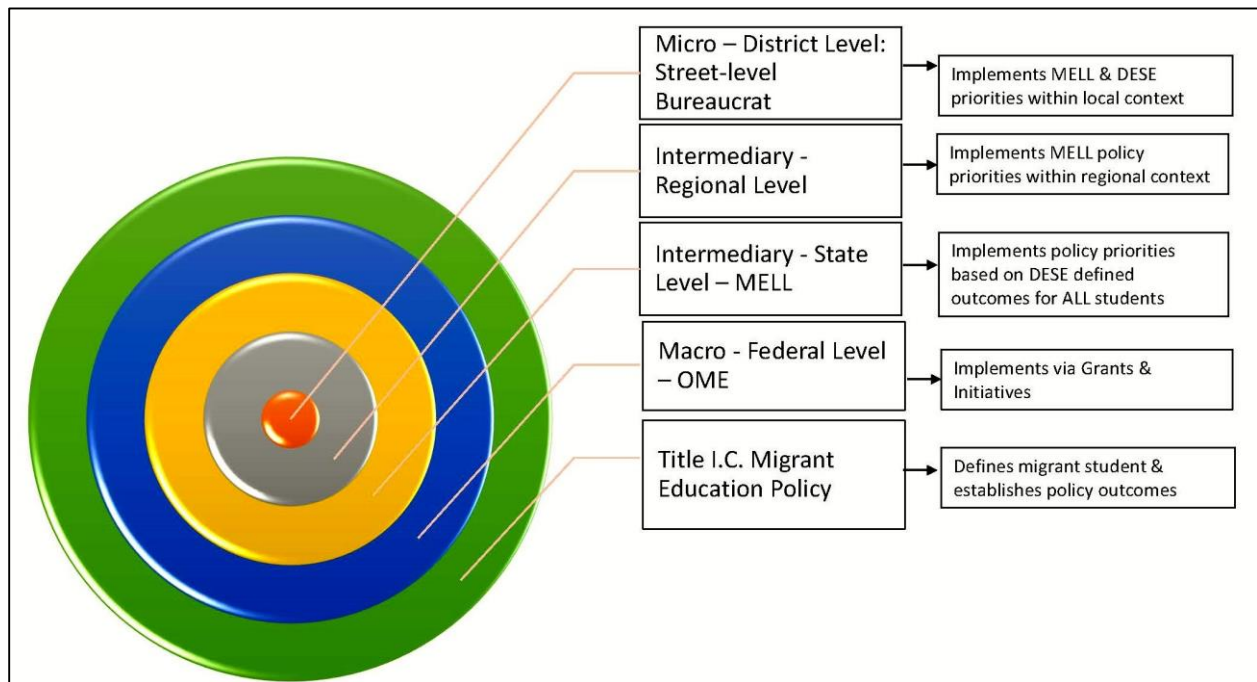


Figure 1. Visual representation of the implementation of the MEP in Missouri

As a policy moves through different layers of implementation, it changes and refocuses the interpretation of the policy, the process and thus the implementation (McLaughlin, 1987). Analyzing policy at the micro level provides useful information about the individual, which is often problematic and unpredictable because the individual’s policy interpretation and implementation are entwined with their biases and desires (McLaughlin, 1987). Alone, the macro and micro levels of analyses do not provide policymakers with sufficient information

about the implementation of a given policy; rather, “at each point in the policy process, a policy is transformed as individuals interpret and respond to it” (McLaughlin, 1987, p. 174). The individuals that actually interpret and implement the policies are the street-level bureaucrats (Birkland, 2011; Honig, 2006b; Lipsky, 1979, 1980, 2010; McLaughlin, 1987; Weatherly & Lipsky, 1977). Honig (2006b) argues that implementation by the street-level bureaucrats at the micro level involves communication with community personnel to develop policies and procedures that informs and enables the policy implementation. Given that part of the MEP is to provide support services to non-academically based social services like healthcare, connections with the community are necessary. Involving these members in the implementation of the district MEP is imperative to its success in promoting equitable access and academic success.

In this study, the street-level bureaucrats are the school district personnel. The street-level bureaucrats are the lowest level of policy implementers. They implement a policy based on their own beliefs, knowledge, resources, capacity, and personal interests (Birkland, 2011; Honig, 2006b; Lipsky, 1979, 1980, 2010; McLaughlin, 1987; Weatherly & Lipsky, 1977). Sometimes these street-level bureaucrats do not implement policies in the way that higher-level planners intended because these street-level bureaucrats may interpret the policy and act according to what they deem as “right.” Werts and Brewer (2015) argue that the basis for what is right is on the lived experiences and perspectives of those local actors implementing the policies. Failing to do so marginalizes this important component of policy implementation. Given the importance of street-level bureaucrats’ beliefs and attitudes (will) toward the policy (and its implementation) and their ability and knowledge (capacity) to implement the policy, policies can be interpreted and implemented in a variety of ways. Additionally, the policy may be intentionally flexible to

allow implementers to determine implementation based on their local context, culture, and politics (Birkland, 2011; Fowler, 2013; Honig, 2006b; Werts & Brewer, 2015; Young & Lewis, 2015). Implementers' will, capacity, and available resources are an important component of their interpretation and implementation strategies. This means that the implementers' interpretation reflects their will, capacity, and available; therefore, this study includes implementers' will, capacity, and available resources.

Good policy implementation studies should combine both an examination of the macro and micro levels, bridging the gap between the street-level bureaucrats and the systematic world of the policymakers. This type of examination can illustrate problems with the federal policy, its intended outcomes, resources needed to accomplish the outcomes, and possibly, how the policy needs reframing based on how the street-level bureaucrats are interpreting and implementing the policy.

This study sought to bridge the gap between the macro (federal) level and the micro (district) level of the street-level bureaucrats to understand how the various levels are interpreting and implementing the Migrant Education Policy. This understanding is pivotal because it reflects changes to interpretations and implementation priorities that affect the academic achievement of migrant students, and how districts are able to serve their needs. The purpose of this study was to understand the adaptations and interpretations of the MEP by the state, the RPDCs, and the districts as part of a multi-level analysis. This multi-level analysis provided necessary information about additional services that could be provided, gaps in the implementation, and adaptations to the policy based on the perspectives and experiences of the

implementers that might alter the overall policy purpose to provide equal educational access to migrant students while promoting their academic success.

Summary

Changing demographics create problems and new opportunities for schools that they previously had not encountered. Policy implementation at the local level includes the values of the implementers, the street-level bureaucrats. These local level personnel are the individuals who implement the Migrant Education Policy. However, the overarching question that remains is, do the interpretations and policy priorities of the street-level bureaucrats align with the federal government's intended outcomes outlined by the federal policy?

The theoretical framework used in this study followed the contemporary generation of policy implementation research that integrates the macro world of policy makers with the micro world of individual implementers (street-level bureaucrats). Utilizing a policy implementation framework (Birkland, 2011; Fowler, 2013; Honig, 2006a; McLaughlin, 1987, 2008; Young & Lewis, 2015) allowed this study to uncover the interpretations and implementation of the Migrant Education Policy at multiple levels to gain an understanding of how well the street-level bureaucrats at the district level are meeting the outcomes prescribed by the policy. Furthermore, this framework allowed the study to uncover differing policy interpretations and implementation priorities as it moved through the distinct policy levels. This is important because it considered Missouri's context, culture, and politics, and the individual districts, and any competing priorities that arose because of the local context.

The next chapter will discuss the methods used for this inquiry into understanding the implementation of the Migrant Education Policy from the federal level to the local level. I will

discuss why this study was best suited for qualitative methodology, outline the research design, and discuss the methods used to collect and analyze empirical data aimed at answering my research questions.

CHAPTER FOUR: METHODOLOGY

In this chapter, I explain the design of the study. Based on the theoretical framework set out in the previous chapter, I explain my choice of methodology, site selection, participant recruitment, as well as the methods I used to collect and analyze the data. Finally, I discuss how I addressed issues of validity and reliability, study limitations and ethical considerations.

Research Questions

The research questions driving this study were constructed with several things in mind. First, these questions reflect my desire to fill a gap in the body of knowledge on the implementation of the Migrant Education Policy from the federal government down to the local level. Second, the policy implementation framework of this study emphasizes how policies shift and change as they are implemented across multiple levels, from the macro level through the intermediary levels to the micro level. The research questions that drove this study are:

1. How does the US Department of Education's Office of Migrant Education interpret and implement the Migrant Education Policy?
2. How does the Missouri Department of Elementary and Secondary Education's Office of Migrant Education, ELL, Immigrant & Refugee (MELL) interpret and implement the federal Migrant Education Policy?
3. How do the regions interpret and implement the federal Migrant Education Policy?
4. How are Missouri school districts interpreting and implementing the Migrant Education Policy?

Research Design and Methodology

Qualitative research, specifically a multi-level, embedded multi-case study (Yin, 2014) was appropriate for this study of changes in policy implementation across multiple policy levels. This was the chosen design for the study, because the emphasis of embedded multiple case studies is on the investigation of a phenomenon occurring within specified boundaries (Hatch, 2002; Merriam, 1998; Yin, 2014). A case may be considered bounded when it is identified as a person, program, activity, event, university, or a policy decision (Creswell, 1998; Hatch, 2002; Heck, 2004; Merriam, 1998; Patton, 1990; Yin, 2014). As part of this examination of the policy implementation, the federal level, the state (Missouri) level, the regional level (the Regional Professional Development Centers) and the school district level, all served as units of analysis, meaning each policy level was considered a separate case. These various units of analysis served as the “bounds” for the embedded multiple case studies, all of which are bounded by the larger context of the implementation of the policy (Yin, 2014). This created multiple cases that are embedded within the large context case study about the implementation of the Migrant Education Policy, and it allowed the analysis to be multi-directional between the districts, the regions, the state, and the federal government.

At each policy level, I examined the interpretation and implementation of the Migrant Education Policy. From the federal (macro) level perspective, I examined the U.S. Department of Education’s Office of Migrant Education’s interpretation and implementation priorities and focus. From the state (intermediate) level perspective, I examined Missouri’s Department of Elementary and Secondary Education’s Office of Migrant Education, ELL, Immigrant & Refugee’s interpretation and implementation. Next, I examined the regional (intermediate) level interpretation and implementation from the perspective of the Regional Professional

Development Centers. Lastly, I examined the school district (micro), street-level bureaucrat perspective on their interpretation and implementation of the policy. The next sections of this chapter will outline the data collection, sampling procedures, and the participants, how I obtained access to the participants, the data analysis, trustworthiness, my role, the study limitations, and the ethical considerations.

Data Collection

Case studies are characterized as holistic portrays of bounded units such as organizations, groups, or individuals (Creswell, 1998; Merriam, 1998). I conducted interviews with ten participants over the course of five weeks. I also collected documents for analysis. In using multiple research methods, I triangulated my data. I describe below how I collected data using each method.

Interviews. I conducted semi-structured interviews with the research participants, which is consistent with the case study method (Yin, 2014). The interviews consisted of six individual interviews, and four were paired interviews (two participants per interview). I gave all participants the option of conducting the interviews in-person, over the phone or via Skype, whichever method was most conducive to their schedules and comfort level. Six individual interviews were conducted over the phone, one pair of interviews was conducted via Skype, and the other pair of interviews was conducted in-person. During each of the interviews, I took handwritten notes and recorded each of the interviews with a digital recorder for later transcription and data analysis. I used an interview guide to provide topics for discussion, giving direction to the interviews while also allowing flexibility to myself and my participants (see Appendix B). I was able to speak with individuals from each of the policy implementation

levels, except the federal level, that worked with both follow-the-crop and processing plant migrants as I had intended. Additionally, each participant was provided a copy of the informed consent script (see Appendix C). Each interview lasted between 45 minutes and two hours.

The purpose of the interviews in this study was to determine how the various policy levels (federal to state to region to district) interpret and implement the Migrant Education Policy. Interviewing allowed me to understand the first-hand experience of the individuals that make the implementation decisions. It also allowed me to understand the implementation priorities and focus of each policy level, while also establishing the understandings each level has in respect to the other levels. Since policy implementation is a fluid process, these interpretations were necessary to understanding the implementation process of the Migrant Education Policy from top to bottom.

Documents. I collected documents from the various policy levels. Policy documents from the U.S.' Office of Migrant Education's website were obtained. These documents outlined the specifics of the policy including the specific programs, outcomes, initiatives, and implementation priorities. Additionally, documents were obtained from the Missouri Department of Elementary and Secondary Education's Office of Migrant Education, ELL, Immigrant and Refugee regarding Missouri's specific migrant policies including programs, outcomes, objectives, and expectations. This included the most recent Migrant Education Program's Comprehensive Needs Assessment and Service Deliver Plan and the most recent Migrant Education Program Evaluation. Each of these documents provided important insight into the state's interpretation and implementation priorities. These documents also provided important information about the state's overall understanding and expectations of districts'

migrant education programs, thus influencing the direction of districts interpretation and implementation of the migrant education policy. Additionally, four out of the five districts, provided me with copies of their most recent Migrant Education Plans. These plans outline specifics regarding district programs, successes and areas of improvement needed in the migrant education programs, and how the districts are working to meet the state's identified program outcomes. These documents helped to outline the specific levels of the policy implementation process as well as how the various actors at the various levels shape the policy. Additionally, they aided in the triangulation of the data.

Site Selection. During the 2013-2014 year, 20 districts in 12 counties representing four Regional Professional Development Centers received Title I.C. Allocations in Missouri, which is the funding provided by the federal government to the states and then allocated to the districts to meet the MEP's goals (Title I, Part C Draft Non-Regulatory Guidance, 2010). I contacted 12 districts from that list. The 12 districts were chosen based on their location in the state, amount of allocation received, and type of work migrants do in that area. Location in the state was a selection criterion because different parts of the state have access to different types of resources and different cultures, some of which are more or less welcoming and inclusive than other regions in the state. Furthermore, I wanted to ensure that I was not selecting districts that were all in the same county and/or same region of the state, thus giving a broader understanding of the policy's implementation across the entire state. I received responses from five districts granting me permission and access to interview personnel about their Migrant Education Policy. A description of each of the five districts follows. Table 1 below highlights demographic data about each of the districts for the 2013-2014 academic year. The data presents the total

enrollment for the district, the percentage of students classified as white, black, and Latino, the percentage of students classified as ELL and the percentage of students receiving free and reduced lunch.

Table 1

AY 2013-2014 Districts' Demographic Information

District	K-12 Total Enrollment	% White	% Black	% Latino	% Other	% Free and Reduced Lunch	% ELL	Expenditure Per Average Daily Attendance
Apples	4811	73.70	5.30	14.90	6.10	65.60	9.18	7,740.25
Bacon	4475	62.60	2.10	31.80	3.50	63.20	24.94	7,823.70
Cherry	2252	64.70	0.60	31.00	3.70	62.90	21.60	8,302.03
Duck	2042	62.30	29.40	6.90	1.40	75.00	0.99	7,852.92
Eggs	322	88.80	0.00	10.90	0.30	84.00	9.30	9,326.73
Missouri Average	1559	83.21	9.32	3.54	3.92	56.45	1.82	10,192.04

District 1: Apples. Apples is located in the western half of the state and about 100 miles east of a major metropolitan area. It is in close proximity to an Air Force Base with 4000 residents. Apples is a small town with approximately 22,000 residents, as of the 2010 census (“Apple’ Census Quick Facts,” 2014). Although predominately white (85%), the Hispanic population makes-up 9% of the total population and is the largest minority group in the town (“Apples’ Census Quick Facts,” 2014). Historically, Apples dates back to 1860 and was a Civil War hotspot due to the arrival of the railroad in 1861. Following the Civil War, Apples was an important stop on the railroad lines. The Missouri Pacific and Missouri-Kansas Tax Railroad (KATY trail) lines passed through Apples on their way to places like Kansas City, St. Louis and Chicago. Apples served as an important stop for the massive Texas cattle drive of 1866 because of its multitude of stockyards. These two rail lines played an important part in Apples’ history,

as the livelihood of Apples' residents related to the success of the railroad. As the cattle drives slowed and eventually replaced by other means of transporting cattle to slaughter, many industrial type jobs were lost. The town had to re-invent itself and establish a new economy ("About 'Apples'", n.d.; "'Apples', Missouri, 2014).

Today, the driver of Apples' economy is manufacturing, the most relevant to this study being Tyson Foods and its poultry plant. Tyson Foods in Apples employs approximately 1500 people. The Tyson plant has been in Apples since the early 1990s. This particular poultry complex includes the "processing plant, hatchery, feed mill, live haul operations, wastewater treatment facility and a rendering operation" ("Tyson Foods," 2012). One of the dominant lures that draws migrants to Missouri are the processing plants like Tyson (Piacentini, Valentine & Cockrell, 2007).

The Apples school district has six elementary schools, one middle school, one junior high, and one high school. The total district enrollment is approximately 4900 students with a student to teacher ratio of 14:1 and a student to administrator ratio of 258:1. The district employs around 400 certified staff members. In addition to the Superintendent, there are two Assistant Superintendents and four district-level administrators. The district is predominately white (74%). Hispanic students make up the largest minority group (15%). Additionally, 66% of the students receive free or reduced lunch.

The Apples school district was chosen because it received \$20,404 in 2013-3014 in Federal Title I.C Allocations for migrant education. It was also chosen because of its location in the state and that it primarily draws migrant workers and their families because of the Tyson Foods processing plant.

District 2: Bacon. Bacon is located in the southwest part of the state, approximately 50 miles or 1 hour from populate destinations like Springfield, Missouri and Branson, Missouri. Bacon is a small town of approximately 14,000 people, according to the 2010 census. The racial composition of the town is 73.6% white. Of the 26% non-white population, 25.6% where Hispanic or Latino and is the largest minority group in the town (“‘Bacon’ Census Quick Facts,” 2014).

Historically, Bacon dates back to 1841. During the Civil War, most of the town was burned by pro-Confederate guerillas. Following the Civil War, Bacon grew rapidly with the arrival of the Missouri Western Railroad in 1872. In 1883, a now Fortune 500 company began designing and producing bedsprings (“Leggett & Platt,” 2014). In additional, lead mines and limestone quarries added significant wealth and prosperity to the town. Then, Route 66 passed through the town in the 1920s which was eventually by Interstate 44 that was rerouted to south of town in the 1960s.

Bacon’s economy has also grown thanks to the various food processing plants, including Ott Foods, Schreiber Foods, and the Goodman Manufacturing Co. Ott Foods are known for their salad dressings that were born out of the opening of a small café along Route 66 in the 1940s. By 1948, the restaurant was closed and the salad dressing business was in full swing (“Ott’s Foods History,” 2011). Schreiber Foods is an employee-owned dairy company out of Green Bay, Wisconsin that came to Bacon in 1950. They produce cheese, cream cheese and yogurt (“Schreiber Foods,” 2014; “Schreiber Locations,” 2014). Goodman Manufacturing Company began in 1909 when it purchased a vanilla formula like no other. By 1927, the company moved to Bacon and as the business grew, they opened a production facility making flavorings and

extracts still used today (“Goodman’s Vanilla,” 2012). Similar to Apples, Schreiber Foods, presumably, draws migrants to the area.

The Bacon school district has five elementary schools, one middle school, one junior high, and one high school. The total district enrollment is approximately 4650 students with a student to teacher ratio of 14:1 and a student to administrator ratio of 203:1. The district employs around 430 certified staff members. In addition to the Superintendent, there are two Assistant Superintendents and two district-level administrators. The district is predominately white (63%). Hispanic students make up the largest minority group (32%). Additionally, 63% of the students receive free or reduced lunch.

The Bacon school district was chosen because it received \$74,818 in 2013-2014 in Federal Title I.C Allocations for migrant education. It was also chosen because of its location in the state and that it primarily draws migrant workers and their families because of the processing plants.

District 3: Cherry. Cherry is located in the southwestern part of the state approximately one hour from larger cities like Springfield, Missouri and Branson, Missouri. Cherry is a small town of approximately 9000 people according to the 2010 Census (“Cherry’ Census Quick Facts,” 2014). Although a predominately-white (87%) community, Hispanics or Latinos account for 19% of the population and make-up the largest minority group.

Founded in 1887, Cherry began as a small flag stop along the St. Louis – San Francisco (i.e. the “Frisco”) Railway, then known as the South Pacific Railroad. The town has experienced rapid industrial growth over the last 10 years as companies like Tyson Foods, Hydro Aluminum, International Dehydrated Foods and Miracle, to name a few, moved to town (“Cherry,’

Missouri, 2014). The most relevant to this study is Tyson Foods, a poultry processing plant employing approximately 750 people, that was acquired by Tyson in 1969 (“Tyson History,” 2014). Similar to Apples, Tyson Foods draws migrants to Cherry.

The Cherry school district has three elementary schools, one middle school, and one high school. The total district enrollment is approximately 2300 students with a student to teacher ratio of 14:1 and student to administrator ratio of 205:1. The district employs around 200 certified staff members. In addition to the Superintendent, there is one Assistant Superintendent and two district-level administrators. The district is predominately white (65%). Hispanic students make up the largest minority group (31%). Additionally, 63% of the students receive free or reduced lunch.

The Cherry school district was chosen because it received \$23,804 in 2013-2014 in Federal Title I.C Allocations for migrant education. It was additionally chosen because of its location in the state and that it primarily draws migrant workers and their families because of the processing plants.

District 4: Duck. Duck is located in the southeastern part of the state or the “Bootheel” of Missouri, approximately 5 miles from the Arkansas border and 20 miles from the Mississippi River. It began its existence in the early 1800s as white settlers built log cabins. Originally named for the Delaware Indian chief who lived in the area, it was renamed in late 1840s. However, its name was change for a third time in the 1851 and began taking on its current form (“Duck’, Missouri,” 2014; “Duck’ History,” n.d.). According to the 2010 Census, Duck’s population was approximately 11,000 people. The racial composition is primarily white (80%),

with 16% African American and only 3.5% of the population is Hispanic or Latino (“‘Duck’ Census Quick Facts,” 2014).

Duck began as a trapping community, transitioned to a timber community, and then into an agricultural area with livestock, farming, and growing cotton and soybeans. Most notably, the first Circuit Court met here in 1846. In 1863, it seceded from the Union. Like much of the country, the town and its businesses were destroyed. Economic recovery began in 1892 with the arrival of the Little River Valley/Arkansas (Cotton Belt) Railroad. In 1893, land reclamation began with organized county drainage districts and levees on the St. Francis River. Forests were cleared and canals were constructed to drain the swamplands converting them into rich, fertile farmland. This rich, fertile land is the state’s top cotton producer (10th nationally) and is the state’s top producer of watermelons and cantaloupes (“‘Duck’ History,” n.d). Still true to its roots, Duck is an agricultural hub of goods like cotton, soybeans, rice, and watermelon that are nationally distributed (“Welcome to ‘Duck’”, 2014). Perceivably, this agricultural hub is what brings migrant workers and their families to the area.

The Duck school district has three elementary schools, one middle school, and one high school. The total district enrollment is approximately 2100 students with a student to teacher ratio of 14:1 and a student to administrator ratio of 163:1. The district employs around 180 certified staff members. In addition to the Superintendent, there is one Assistant Superintendent and six district-level administrators. The district is predominately white (62%). African-American students make up the largest minority group (29%), Hispanic students account for 7% of the student population. Additionally, 75% of the students receive free or reduced lunch.

The Duck school district was chosen because it received \$49,876 in 2013-2014 in Federal Title I.C Allocations for migrant education. It was additionally chosen because of its location in the state and that it primarily draws migrant workers and their families because crop production (cotton, soybeans, etc.).

District 5: Eggs (Fish, MO). Located in the same county as Duck, in the Bootheel of Missouri, it was incorporated in 1895 (“Fish’, Missouri,” 2014). Fish is a very small town of less than 1000 people according to the 2010 census. The racial composition is predominately white (96%). Hispanics and Latinos account for 3.4% of the population (“Fish’, Missouri,” 2014). Like its neighbor, the basis of Fish’s economy is crop production like cotton, soybeans, rice, and watermelon.

The Eggs school district has six elementary schools and one high school. The total district enrollment is approximately 350 students with a student to teacher ratio of 12:1 and student to administrator ratio of 107:1. The district employs around 40 certified staff members. In addition to the Superintendent, there is one Assistant Superintendent and two district-level administrators. The district is predominately white (89%). Hispanic students make up the largest minority group (11%). Additionally, 84% of the students receive free or reduced lunch.

The Eggs school district was chosen because it received \$23,521 in 2013-2014 in Federal Title I.C Allocations for migrant education. It was also chosen because of its location in the southeastern or “Bootheel” part of the state and that it primarily draws migrant workers and their families because crop production (cotton, soybeans, etc.).

Sampling Procedures. This study uses purposeful sampling. This means intentionally selecting “individuals or sites to learn or understand the central phenomenon” (Creswell, 2015, p.

205). Following this definition, I chose participants based their roles and duties at the various levels (Creswell, 2015). Representing the district (micro) level, each superintendent of the five districts identified key personnel to include in this study. The group included Assistant Superintendents, Federal Program Officers, Coordinators, and Principals, to name a few. These people were identified as important to this study because they are directly involved in the implementation of the Migrant Education Program in their respective school districts. Additionally, I contacted an administrator in the Missouri Department of Elementary and Secondary Education's Office of Migrant Education, ELL, Immigration & Refugee to discuss the implementation of the Migrant Education Policy from the state perspective. Lastly, I contacted several individuals, including Instructional Specialists and Migrant Identification Specialists from the Regional Professional Development Centers to discuss the implementation of the Migrant Education Policy from the regional perspective. In all, I intended to sample 10-15 participants, and the target sample was to include individuals from each of the policy implementation levels, with specific attention given to including participants that worked with both follow the crop migrants and processing plant migrants. Furthermore, I intended to sample administrators from the US Office of Migrant Education, but after multiple failed attempts, no one from that office was sampled. My final sample included ten participants in a number of capacities and locations. While in the midst of interviewing the ten participants, I was attempting to recruit additional participants because I was uncertain if I would have enough data to reach data saturation. By the conclusion of the tenth interview, I reached data saturation, as participants were echoing each other's perspectives on the implementation of the Migrant

Education Policy. Therefore, I stopped trying to recruit additional participants. Further details about these individuals are below.

Participants. I examined the macro level from the perspective of the US Department of Education’s Office of Migrant Education. While I was not able to interview anyone from this office, I was able to acquire multiple policy documents that outlined their implementation focus and priorities. In moving to the next levels, I interviewed one individual at MELL for his interpretation and implementation process and plan. Next, three individuals at three Regional Development Centers were interviewed for their role in the policy implementation. Finally, I interviewed six individuals from five Missouri school districts for their role and interpretation of the policy and its implementation. The table below outlines participants’ gender, ethnicity, location in the state, policy level, number of years as an educator, and number of years the individual has worked with migrant students. Participants’ positions and titles are not included in the table to protect the participants’ identities.

Table 2

Participants’ Information

Location	Pseudonym	Gender	Ethnicity	# Yrs. Educator	# Yrs. Work with Migrants	Policy Level
Apples	Jill	Female	White	23	10	District
Bacon	Jane	Female	White	26	12	District
Cherry	Joe	Male	White	18	3	District
Cherry	Sally	Female	White	20	10	District
Duck	Bill	Male	White	29	11	District
Eggs	Sarah	Female	White	11	9	District
NW Region	Louise	Female	Latino	0.5	0.5	Region
SE Region	Ben	Male	Latino	20	10	Region

Central Region	Jen	Female	Latino	33	27	Region
MELL	Tom	Male	White	22	16	State

Participant and Access to Sites. To gain permission and access to district personnel, I contacted the Superintendent at each of the districts via email. A copy of the email solicitation script is in Appendix D. The Superintendent gave me initial permission and the appropriate personnel to contact. In some cases, the Superintendent supplied a written letter granting permission and access to the district personnel to give to the University’s Institutional Review Board (IRB). In other cases, the district personnel I was introduced to via email supplied the written letter. In addition, the personnel the Superintendents introduced me to via email served as my point of contact with the districts. In most cases, this person was the interviewee and in one case, this person initiated introduction to another person in the district. There are potential implications in that the superintendent may deem the person I was directed to contact as doing a “good job.” Additionally, it may be a person that shares the same vision or in some cases it may be the only person in the district that deals with this population and oversees the implementation of the district’s migrant education program. For whatever reasons the superintendent chose these individuals, their personal beliefs and values influence the policy implementation process (McLaughlin, 1987). As part of the IRB and good research practices, I informed each interviewee of their rights and provided a written informed consent script, as outlined by the University of Missouri’s Institutional Review Board (see Appendix C). I assigned each participant a pseudonym to protect his/her identity.

Data Analysis

The purpose of data analysis is to search for meaning and a way to process the data so that it can be communicated to others. The data analysis provides a way to make sense of the data in such a way as to provide sharable findings to the participants, the academic community and to policymakers. Additionally, this sense making allows the data to reveal things we may have not previously known (Hatch, 2002; Yin, 2014). Inductive data analysis is the organizing and probing of the data to find patterns and themes (Hatch, 2002). The researcher's thoughts and beliefs are entwined in the methods, collection, and analysis of all data and its interpretation. Therefore, it is important to allow the data to speak for itself rather than to force the data into categories (Strauss & Corbin, 1998).

I conducted data analysis simultaneously as I collected the data. Analyzing data while simultaneously collecting data allowed the basis of further data collection to be on the findings, and to further develop the story that was unfolding. In this sense, the analysis helped to inform the collection, such as types of questions to ask and themes to follow-up (Hatch, 2002). Initial themes or categories emerged from this study's data. As new themes emerged, they were explored across the various types of data. This promoted the triangulation and credibility of the findings (Hatch, 2002; Lincoln & Guba, 1985). Open coding was used to accomplish this task. Open coding is the breaking "down [of data] into discrete parts, closely examined, and compared for similarities and differences" (Strauss & Corbin, 1998, p. 102). To put the parts back together, axial coding was used. Axial coding is the "process of reassembling data that [was] fractured during open coding" (Strauss & Corbin, 1985, p. 124). In this stage, categories that began to emerge during open coding were used to create new categories that related together the initial categories to create a more precise and complete picture of the phenomenon (Strauss &

Corbin, 1985). Finally, selective coding was used to finish the coding process. In selective coding, “the process of integrating and refining categories” (Strauss & Corbin, 1985, p. 143) occurs. These final categories were created, and aided in the writing the multiple cases and the ‘story.’

Through these coding stages, I built a coding matrix (Yin, 2014) as I identified patterns/categories (see Appendix E for a modified version) and organized them by policy level. Through this matrix building process, categories were constructed and reconstructed until clear patterns emerged from the data. One category that was constructed and then reconstructed, and then examined by policy level was access to equal educational opportunities with participants making statements like “they’re kids and we educate them” (Jill) and “You have one kid, you have to provide them with that adequate education” (Tom). Local culture, local climate, supportive community, disengaged community, lack of community support, social isolation and anti-immigrant sentiment are examples of initial categories that were merged into a single category (culture) that was then cross-referenced with access and academic achievement by policy level. My data analysis was complete when I reached data saturation with the interviews and the documents, meaning no new themes or patterns emerged in the data.

In accomplishing this analysis process, all interviews were digitally recorded and transcribed by a hired transcriber. Once each interview was transcribed, I followed-up with the interviewee via email to make sure the transcription and subsequent interpretations were reliable. These follow-ups also allowed me the opportunity to clarify any gaps in the transcript and to clarify any points in the transcript that were unclear. Next, I used NVivo 10, a qualitative research software program, to analyze the content of the transcripts and to organize my data.

Multiple case studies were created based on the level of implementation. These multiple cases are embedded within the large case context of the Migrant Education Policy. These various units of analysis serve as the “bounds” for the embedded multiple case studies, all of which are bounded by the larger context of the implementation of the Migrant Education Policy (Yin, 2014). Once these case studies were constructed, they were compared and contrasted, to generate propositions about which factors in each context accounted for differences, when they existed. For policy implementation, these multiple cases studies highlighted similarities in the implementation and differences between the implementation priorities at the different policy levels.

Trustworthiness. Trustworthiness is a major concern in qualitative research (Lincoln & Guba, 1985). In order to ensure that the trustworthiness criteria of credibility, transferability, dependability and confirmability were met in this study, triangulation, debriefing, member checks, thick descriptions and analysis of researcher’s role were used to meet the trustworthiness criteria (Lincoln & Guba, 1985). Triangulation of multiple methods of data collection (e.g. interviews and documents) was used to ensure credibility, confirmability, and dependability of the data and the study. Triangulation is the corroboration of multiple sources of data, in this study interviews, documents and artifacts. This triangulation of multiple sources provides evidence that the results are credible (Denzin & Lincoln, 2005; Yin 2014).

In addition, member checks were conducted with the participants who are willing to participate in the member checking process. The member checking process involved sharing data, analysis, interpretations, and conclusions with participants to verify and judge their accuracy and credibility (Lincoln & Guba, 1985). Participants were given the chance to provide

contact information for this purpose. Member checking with various participants was conducted to also ensure conformability, and credibility. Peer debriefing with colleagues and my committee advisor were conducted to further ensure the confirmability, and dependability of this study. Thick descriptions provided transferability and dependability of the study, as did an analysis of the researcher's role.

Researcher's Role. An important component of trustworthiness that applies to all four areas of trustworthiness is the researchers' role. In qualitative research, the researcher is an instrument in the collection and analysis process (Lincoln & Guba, 1985). As a result, my biases and beliefs play an integral part of the collection, analysis, and interpretation of data. Specifically, I believe that the good intentions of the policy are often overshadowed by the reality of this population's lives. State and district personnel, including teachers, may have every good intention of helping this population of students, but lack of resources and limited time with them makes their ability to meet the outcomes, whatever they may be at that level, very difficult. Furthermore, I believe that the literature demonstrates that the needs of this population have changed very little over the last 30 years, suggesting that there is a disconnect somewhere in the policy implementation process. The importance of recognizing my role in this study is that it forces me to be aware of my biases so that they did not overshadow the findings of the study or lean me in particular direction rather than allowing the data to tell its story. I kept my personal feelings to myself unless explicitly asked because I did not want them to overshadow what the participants were saying.

Part of my job responsibilities deals directly with policies, including government policies, university policies and college policies. I interpret and implement multiple policies daily.

Through my committee work, I am also currently involved with designing and writing a new university policy, establishing its outcomes and processes, defining and developing an implementation plan and developing an assessment plan to monitor and evaluate the success and failures of this new policy. These experiences with interpreting and implementing policies shaped my interpretations and understandings of the data by allowing me to relate with my participants' frustrations with policy mandates that contradict best practices. Additionally, my experiences allowed me to understand the policy implementation process from a real-world perspective that extends beyond theoretical knowledge. As such, my understanding of the data and, therefore, my analysis of the data was influenced by my daily responsibilities in interpreting and implementing policies.

While my experience with implementing policies is significant, my experiences with migrant students, their families and their culture is limited to the previous research that I have done on it. I have never spoken with a migrant farmworker in the US, but I have seen them in orchards and fields in several different states. The lack of interaction with this population is due to my inability to speak Spanish and my lack of time needed to spend in the "field" with this population.

Study limitations

Several limitations influenced this study's data collection and analysis. There are limitations affecting the validity of the study. For example, the school district sites are in mostly rural locations in Missouri. For the most part, these areas are mostly conservative and predominately white, middle-class. These characteristics can color the participants' perspectives differently than if the sites were in areas that are more diverse or metropolitan areas of the state.

Had school districts with lengthy histories of educating migrant children or districts with lengthy histories and large immigrant populations participated in this study, participants would have had different perspectives. For example, metropolitan areas like Kansas City and/or St. Louis that have lengthy histories of working with new immigrants, of all backgrounds, and greater diversity in their student populations would probably have more programmatic options for students. Additionally, students in these districts are more likely to be around other students that are more “like” themselves.

The research method choice also influences the generalizability of the research findings. Because this study was a qualitative, multi-level case study, findings are not applicable to other districts or states. A study conducted in metropolitan and/or suburban districts or in another state might have very different findings. For example, a study conducted in a metropolitan or suburban area could look very different because these districts tend to be larger and have more resources to use when working with disadvantaged populations such as this one. Therefore, this multi-level case study method can potentially fill gaps in the migrant education literature and potentially expand the literature on policy implementation studies based on education policies.

There are a few other noteworthy limitations to this study. First, the study does not include the perspective of the classroom teachers, the migrant students, or the migrant families. It also does not include the perspective of the community members and groups that aid this population. This is a limitation because community members and groups have established resources, procedures and mechanisms in place, many times, to aid this transient population. By not including their perspective in this study, it does not take into account these services and resources that may be available to the migrant population. In not including community members

and organizations, it is possible that an element of my interpretation and analysis of the data has been misunderstood. However, the regional participants do work closely with their communities to help migrant students and their families, and have a good understanding of the resources and services that are available to migrant students and their families. Therefore, I believe I was able to reduce the likelihood that I misinterpreted the data by not including community members and organizations. However, this is a possible area for future research. Second, this study is about of a population that could be considered highly sensitive for a variety of reasons including their legal status to work in this country. Third, participants may be reluctant to reveal their true positions and understandings of the policies and the policy implementations, for fear of retribution and/or retaliation. To help safeguard against this potential limitations, I offered participants the opportunity to conduct the interviews away from their workplace. In several cases, the interviews were conducted away from their workplace.

Ethical Considerations

As noted above, it is possible that certain findings may contradict stated policy and planned implementation. Therefore, prior to beginning the interviews, I stressed to participants that any and all information shared with me would be kept strictly confidential. This was reiterated, in writing, in the written consent script. Additionally, any participants that were reluctant to voice their true positions elected to conduct the interview away from their workplace in a space he/she considered “safer.”

Following the University’s Institutional Review Board guidelines, I assured each participant that he/she would receive a pseudonym in transcripts and any other documents that I have written, and will write, that relates to them. In addition, I gave each site a pseudonym to

further protect the confidentiality of the participants. Furthermore, all files and documents relating to this study were kept in a secure location known only to me.

Lastly, I considered my own bias as a researcher in this study and took that into account as I began collecting and analyzing data because my bias may have influence. Based on my beliefs, I hold a pro-education position for all migrant students in all aspects (legal status, language status, race, gender, etc.). As such, I refrained from expressing my own views with my participants. To ensure that my personal beliefs did not influence my participants, I only shared details with my participants if they inquired, this only occurred at the end of one interview. It is of the utmost importance that my focus and concern, as a researcher, was for my participants to have the ability to express their opinions and views without hesitation and with minimal researcher influence.

Summary

In this chapter, I outlined the methodology of this study on the implementation of the Migrant Education Policy. I presented the research questions, described the data collection and data analysis methods I used to conduct this study. Additionally, I presented the sampling procedures, participants, trustworthiness, the researcher's role, the study limitations and the ethical considerations. I also described the five school districts and their communities that encompass the micro level interpretation and implementation of the Migrant Education Policy. In the next chapter, I will present the findings of this study.

CHAPTER 5: IMPLEMENTING THE MEP IN MISSOURI

In this chapter, I present the findings of this study. I answer the research questions in the order they were initially asked.

1. How does the US Department of Education's Office of Migrant Education interpret and implement the Migrant Education Policy?
2. How does the Missouri Department of Elementary and Secondary Education (DESE)'s Office of Migrant Education, ELL, Immigrant & Refugee (MELL) interpret and implement the federal Migrant Education Policy?
3. How are the Regions interpreting and implementing the Migrant Education Policy?
4. How are Missouri school districts interpreting and implementing the Migrant Education Policy?

The findings of this chapter are presented by research question. The findings that answer the first question about how the OME, the macro level, implements the MEP focuses on the OME's role, and on the regulations and resources OME provides to states and districts. This information is necessary to develop an understanding of what services and resources are available to the states and the districts. Next, the findings that answer the second question about how the state, an intermediary organization, implements the MEP focuses on how MELL perceives itself as a mediator of policy, then describes Missouri's Migrant Education Policy. Next, I describe the challenges MELL perceives in identifying migrant students and how MELL focuses its implementation on providing access to migrant students. Lastly, I describe how MELL interprets academic achievement and success.

The findings that answer the third research question on how the regional (RPDCs), intermediaries, implement the MEP begins with RPDC concerns with how migrant students are identified. Next, I describe their perceived problems in providing access to educational opportunities. Lastly, I present RPDC administrators' beliefs about why language proficiency is necessary.

The findings that answer the last research question about how districts, the micro level street-level bureaucrats, implement the MEP, begins with a focus on district's lack of knowledge about the MEP defined outcomes. Next, I describe why districts believe migrant students need academic English. Then, I present districts' perceptions on meeting the non-educational needs of migrants. Lastly, I present districts' perceptions of parental involvement.

Federal (Macro) Level Policy Role and Implementation

This section answers the first research question: *How does the US Department of Education's Office of Migrant Education interpret and implement the Migrant Education Policy?* At the macro level, the federal government sets the Migrant Education Policy. The macro level defines the policy, defines the target population, and determines the outcomes. The Office of Migrant Education (OME) implements the Migrant Education Policy through grants and initiatives. The OME also provides guidance to state education agencies (SEAs) and monitors compliance through annual evaluation reports. Each of the OME's grants and initiatives emphasize different aspects of the defined MEP outcomes.

Federal Grants

The OME administers several types of grants to state educational agencies (SEAs) and Institutions of Higher Education (IHEs) to improve migrant students' access to educational

opportunities. The OME provides five grants to aid in the implementation of the policy and to promote the development of migrant education programs. These five grants are:

- The College Assistance Migrant Program (CAMP)
- The High School Equivalency Program (HEP)
- The MEP Consortium Incentive Grants
- Migrant Education Even Start (MEES)
- The Title I Migrant Education Program (MEP).

Each of these grants serves to provide funding to create and/or improve educational opportunities for migrant students at various stages of their lives. The MEES program focuses on early childhood education; the MEP focuses on K-12 education. HEP focuses on helping migrants at least 16 years old in obtaining their GED or equivalent to gain non-migrant employment or entry into postsecondary education. CAMP assists migrant students during their postsecondary education. Finally, the MEP Consortium Incentive Grants focus on arrangements between states and within states to aid in the delivery of educational services without interruption (OME, “Programs,” 2012).

Programmatic Initiatives

The OME has implemented several programmatic initiatives to aid migrant students in achieving academic success. These initiatives are the Binational Migrant Education Initiative (BMEI), the Comprehensive Needs Assessment, Identification and Recruitment Initiative, and the Student Records Exchange Initiative. The BMEI focuses on leadership and operation of state MEPs. Under the BMEI, the OME holds annual meetings of State Directors, aids in the coordination of efforts among the SEAs, and provides strategic plan information to SEAs while

evaluating and updating the current strategic plan based on implementation of the US-Mexico Memorandum of Understanding on Education (OME, “BMEI,” 2015). The Current Needs Assessment Initiative is a three phase comprehensive statewide needs assessment to provide reliable results and information to SEAs to improve programmatic decision-making (OME, “Comprehensive,” 2014). The Identification and Recruitment Initiative focuses on providing training and knowledge to identification and recruitment specialists. This training includes the development of identification and recruitment strategies, resources and best practices and access to current Federal policy guidance (OME, “Identification,” 2013). The final OME initiative is the Migrant Student Records Exchange (MSIX) Initiative. MSIX allows states to access to migrant student education and health records in other states. This information is necessary to track accrued credits and various state graduation requirements (OME, “Records,” 2014).

Summary of the Federal (macro) Level Implementation

Through their various grants and initiatives, the OME’s implementation of the migrant education policy seems to offer states and schools districts great flexibility in determining what their migrant education programs should be. Furthermore, this allows states and districts to prioritize their implementation based on their migrant students’ needs. Additionally, the grants and initiatives provide states and districts with resources to create and define their implementation strategies.

State (Intermediary) Level Implementation

This next section will address the second research question: *How does the Missouri Department of Elementary and Secondary Education (DESE) ’s Office of Migrant Education, ELL, Immigrant & Refugee (MELL) interpret and implement the federal Migrant Education*

Policy? The state (intermediary) level implementation focuses primarily on how MELL perceives itself to be a policy mediator, Missouri's Migrant Education Policy, challenges in identifying migrant students, access to educational opportunities and promoting academic achievement and success. To answer the research question, it is important to begin with understanding how Missouri is structured and how that structure implements the MEP.

In Missouri, the Office of Migrant Education, ELL, Immigrant, and Refugee (MELL) oversees and administers the Migrant Education Policy. MELL is a department under the Quality Schools division of the Missouri Department of Elementary and Secondary Education (DESE). The MELL office has a director, a supervisor, and an administrator of migrant identification and recruiting whom handles the migrant student information exchange (MSIX). Additionally, MELL has instructional specialists and migrant identification specialists that are housed and work with the Regional Professional Development Centers (RPDC) throughout the state. There are seven instructional specialists in five MELL regions and five migrant identification specialists in five RPDC regions. The instructional specialists provide districts, schools, and teachers with instructional materials, best practices and policy interpretations for migrant and English Language Learners (ELL), among other things. Tom, a high-level MELL administrator with authority and participant of this study, explained that the migrant identification specialists, also known as recruiters, help to identify migrant students and serve as liaisons between the schools, the state, the community, and the families.

This structure places MELL and the RPDCs in the role of intermediaries in the policy implementation process. Figure 2 below highlights this unique structure. MELL serves as an intermediary organization between the federal government and the regions and school districts in

Missouri. The RPDCs serve as the intermediary between MELL and the school districts. The role of the intermediaries in the policy implementation process is necessary because the intermediaries take their understanding of the policy and apply it to their local context (Honig, 2006a; Owens, 2014).

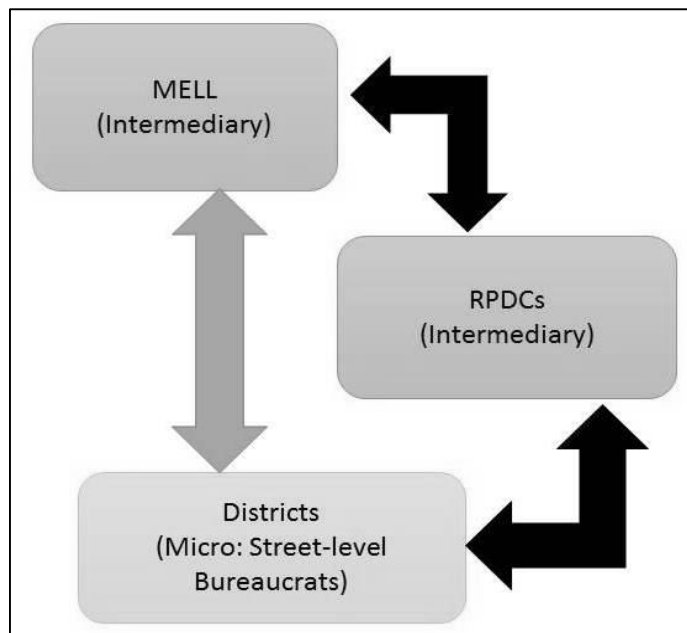


Figure 2. Missouri's MEP implementation structure

MELL's Perceives That It Does Not Set Policy; It Mediates Policy

Rather than seeing MELL as a policy setter, Tom, a high level MELL administrator with authority, sees MELL as more of an enforcer of the federal policy and a resource for school districts in implementing the federal policy. This suggests that MELL defines its role in the implementation process as an intermediary (Honig, 2006a; Owens, 2014) that simply mediates between the OME and the regions and the districts. Furthermore, Tom suggested that Missouri has no established, independent policy. Tom said,

I don't know if [the Director of MELL] has ever sent out a policy agenda...Has the state set out any kind of policy agenda to meet the needs of these children? I'd say no. It's pretty much up to [the Director of MELL] and what the federal law tells [him]...there's no state money that goes to these children, no state program or anything like that.

Arguably, Tom believes there is no official state policy regarding migrant education.

Instead, Tom believes that MELL simply interprets the policy differently than do other states. Tom said,

All of the state directors will...do definitely interpret things differently and it gets kind of interesting ... how we all are doing things a little bit differently. In my particular case, I will tell everybody who wants to listen that it's probably harder to get a child deemed to be eligible for the program in Missouri than in any other state because [we] don't want to ever have any issues of identifying ineligible children. Does that mean that there have been eligible children that have not been identified just basically because of [the director's] attitude, then yes. That's true. But [we] don't know exactly how to not do it that way.

While Tom believes Missouri has no established, independent policy and simply interprets the policy differently than do other states, it appears that Missouri and MELL does have a policy, as evidenced through the Comprehensive Needs Assessment Report (CNA Report). Tom's, and arguably MELL's, perception that there is no official Migrant Education Policy in Missouri, suggests a lack of understanding about the CNA Report's purpose. Furthermore, the expectation for school districts is to report evidence of meeting the goals and outcomes listed in the CNA Report. This suggests that Tom, and MELL, do view the CNA Report as a policy setting

document. Perhaps, this perception is because the report did not originate solely and explicitly from MELL. A second possibility is that perhaps Tom has this perception because he believes MELL is simply an intermediary that enforces federal policy. As noted, Tom, and arguably MELL, does not believe MELL and the Director of MELL to be policy setters and see their role as enforcers of the federal policy, because Tom does not believe Missouri has a separate, explicit MEP. Without a migrant education law or regulation that stems from the state legislature, Tom and MELL, believe there is not an explicit Missouri MEP. Contrary to Tom's beliefs, there appears to be a Missouri MEP, because the CNA Report outlines, clearly, a MEP for Missouri students with targets, outcomes, and policy goals.

Missouri's Migrant Education Policy

Contradictory to Tom's perception, there appears to be a migrant education policy in Missouri. The CNA Report outlines the policy, its outcomes, goals, and implementation strategies. Beginning in 2012 and concluding in 2013, a comprehensive needs assessment was conducted and a service delivery plan (CNA Report) was created for Missouri's migrant education program (CNA Report, 2013). The task force that conducted this assessment included the Director of MELL, RPDC administrators, and selected school district personnel responsible for local MEPs. This assessment was conducted as part of the OME's Current Needs Assessment Initiative and followed their suggestions (CNA Report, 2013). Based on the findings of the assessment, Missouri's MEP has defined four goal areas: communication arts achievement, mathematics achievement, school readiness and high school graduation (CNA Report, 2013). Based on these four goals, the CNA Report outlines solutions for each of the goals. The solutions include providing professional development, increasing parental

involvement, increasing access to educational tools and services, improving records transfers, improving school readiness through early childhood access, providing additional instructional services (i.e. content tutors, language tutors, and language instruction), and coordinating non-educational services and needs with local, community organizations. The complete list of solutions for each goal is in Appendix F. The solutions outlined by the state in the CNA report incorporate the federal MEP outcomes. Furthermore, these goals and their solutions provide implementation priorities to the regions and the districts, also outlined in the CNA Report.

The goals and solutions outlined in the CNA Report demonstrate that Missouri arguably has a Migrant Education Policy. It also demonstrates that Missouri's policy has outcomes, targets, and implementation priorities. Furthermore, Missouri's policy outcomes incorporate the federal MEP outcomes. The CNA Report also identifies MELL's role in this process. As such, MELL requires districts to provide annual Migrant Plans that address how they will meet each of the state's policy goals. MELL is then able to provide the OME with information on how Missouri is meeting the federal goals. While the CNA Report provides evidence of a Migrant Education Policy, arguably MELL does not necessarily understand its role as a policy setter for Missouri's MEPs; rather, MELL arguably views its role as a policy intermediary with no policy setting authority. Had the Director of MELL not be involved in the creation of the report, it could be argued that MELL was unaware of the policy. However, the Director of MELL was involved and this suggests that either MELL disagrees with the content of the report or that MELL believes the content of the report to be outlining their responsibility in implementing the federal MEP. Given that Tom believes MELL is an enforcer of the federal MEP, it suggests that MELL understands the CNA Report to be outlining their responsibilities. However, it appears

that the CNA report does more than just outline responsibilities. Through the service delivery plan (phase two of the comprehensive needs assessment), there appears to be evidence of outcomes and targets specific to Missouri's MEP, which suggests a Migrant Education Policy specific to Missouri, based on Missouri's other education policies and Missouri's migrant population.

The service delivery plan (SDP) developed because of the comprehensive needs assessment, and outlines how the state will focus its efforts and implement the migrant education program based on the comprehensive needs assessment.

The SDP will help the Missouri MEP develop and articulate a clear vision of: 1) the needs of Missouri migrant children; 2) the State MEP's measurable outcomes and how they help achieve the State's performance targets; 3) the services the State MEP will provide on a statewide basis; and 4) how to evaluate whether and to what degree the program is effective. (CNA Report, 2013, p. 26)

Furthermore, the SDP outlines how Missouri's MEP will be evaluated. This evaluation not only meets the state requirements, it meets the annual federal reporting requirements. The University of Missouri's Office of Social and Economic Analysis (OSED) conducted the most current evaluation of Missouri's MEP.

The evaluation of the Missouri MEP will be completed by the State with the assistance of an external evaluator knowledgeable about migrant education, evaluation design, Federal reporting requirements and OME guidelines, and the Missouri MEP. The evaluation will systematically collect information to improve the program and to help the State make decisions about program improvement and success. (CNA Report, p. 30)

The evaluation will report both **implementation** and **outcome** data to determine the extent to which the measurable outcomes for the MEP in communication arts, math, school readiness, and secondary/OSY achievement and high school graduation have been addressed and met. (CNA Report, p. 31)

While it appears that the SDP is requiring MELL to demonstrate this information, the list of questions that must be answered in the evaluation report relies heavily on the information provided to MELL by the districts in their annual migrant plans. A full list of these questions is in Appendix G, but includes information on local projects, parental involvement, instructional activities, MAP outcome data, and graduation rates. Additionally, the use of OSEDA as the external evaluator could be viewed as a biased evaluation because OSEDA, while external to MELL and DESE, is an office that conducts research almost explicitly in Missouri and is engrained in Missouri culture and climate. Additionally, OSEDA may not be fully aware of all the requirements and best practices associated with migrant education, as would a larger, external evaluator that conducts MEP evaluations for a variety of states. The use of a more external evaluator, like WestEd for example, could provide MELL with an evaluation that is unfamiliar with Missouri conducted by evaluators more familiar with successful MEP's across the country. Additionally, this type of evaluator could provide MELL with useful information about different strategies and ways to implement their program.

Based on this information, there appears to be a contradiction between what is stated and outlined in the CNA Report and what Tom stated about how there is no official Missouri Migrant Education Policy. While the CNA Report outlines MELL's responsibilities and how they will be evaluated, what becomes clear in the SDP plan is that the responsibility to report progress on

Missouri's policy outcomes falls onto MELL; however, the real implementation of the policy lies with the school districts. This understanding highlights MELL's role in the policy implementation process. MELL is an intermediary organization. MELL mediates between the federal policy and its defined outcomes and the regional implementers and the school district (street-level bureaucrat) implementers. MELL interprets and implements the federal MEP, and arguably the state MEP, to best address the needs of Missouri's migrant students.

Honig (2006) and Owens (2014) explain that intermediary organizations, like MELL, mediate between the federal policy and the local actors. Empowered by the OME, Missouri does have a defined Migrant Education Policy with clear definitions, outcomes, targets, and evaluation expectations. Missouri's MEP considers the goals and outcomes of the federal policy and reinterprets them to be reflective of DESE's academic expectations for all students within the local context and culture of Missouri. Embedded within Missouri's MEP goals and outcomes are the federal MEP goals and outcomes, suggesting an alignment between Missouri's goals and the federal goals. This understanding suggests that, contradictory to Tom's, and arguably, MELL's, perception, there is a Migrant Education Policy in Missouri. Perhaps Tom believes Missouri has no official policy because Missouri does not have a law, regulation, or mandate coming from the legislature. However, the CNA Report does clearly show a Migrant Education Policy. It also reinforces Tom's perception that MELL is a mediator. Arguably, MELL mediates between the federal policy and the regions and school districts in Missouri. It could be further argued that MELL mediates between the policy outlined in the CNA Report and the regions and school districts. In its role as an intermediary organization, MELL implements the policy outlined in the CNA Report.

MELL's Challenges in Identifying Migrant Students

One of the biggest challenges in working with migrant students is finding and identifying migrant students, according to Tom and three RPDC administrators, including a recruiter. These participants explained the identification process. Since MELL defines the identification process, I allowed Tom to be the authority on the topic. Tom explained that when a new student arrives in a school district, the family completes a welcome and identification packet. In this packet of information is a series of questions that asks parents if they have moved within the last three years and if the work is one of several, specific types of agricultural work. If the parent answers "yes" to any of these questions, the information is sent to MELL. MELL reviews the information provided and the location in the state. If MELL finds that this student might be eligible for migrant services, the information is sent to the appropriate regional migrant identification specialist. The specialist investigates by interviewing the family. Following the interview, a certificate of eligibility is completed with a family form. These materials are returned to MELL to certify the student as migrant and determine which services the student is eligible for (Tom). According to Tom, the limitation of this identification process is that it requires school districts to inform the state about who might be a migrant student.

Given the importance of finding and identifying migrant students, Tom emphasized how identification is one of the big priorities and goals of his office. Tom said,

...we want to find these children as quickly as we possibly can, identify the needs that they have, the unique needs because they are migrant children, and start getting those needs provided as quickly as we can. Um, so it's a matter of, a big matter of cooperation in our state. I work very hard to make sure they're asking the right questions, that

everybody gets asked those questions, so a lot of my job is monitoring that process and ensuring the districts do that. I also work, do a lot of work getting our recruiters trained to identify who's eligible and who's not. And we also will ask the parents about special needs and issues that the children have, and I do a lot of training on how to communicate that to the districts so they can quickly start providing services. So to me it's about that relationship, the speed that we have to find the children and get them the services that they need.

Tom's statement suggests not only the importance of identifying the migrant students, but also the role the districts and recruiters play in the process. Specifically, Tom suggests that districts are the initial point of contact in beginning the migrant eligibility process, or not beginning the process. Additionally, recruiters are responsible for making the determination of whether or not a student is eligible for migrant services. Since proper identification relies heavily on districts and recruiters, proper training is very important. His statement also highlights the value MELL places on ensuring that recruiters and districts are appropriately trained to identify the migrant students, including asking the right questions. However, his statement seems to contradict other statements he made about districts not being aware or informed about migrant students and practices related to migrant students, which suggests that the communication and relationships that he refers to are not as strong as he indicated. Additionally, the reliance on districts and recruiters to ensure proper identification of migrant students could be one of the possible causes for the identification problems that Tom discussed.

There are around 800 identified migrants in Missouri. However, Tom believes there are closer to 1700 migrant students in Missouri. This means that about half of all migrant students in

Missouri are not properly identified and presumably not receiving services. Arguably, the number of unidentified migrants could be the result of several possible explanations. One possibility is MELL's interpretation of the federal government's migrant definition. Another possibility is that school districts do not notify the state about possible migrants because of the amount of paperwork involved. A third possibility indicated by Tom was the decreasing patterns of mobility among migrant families across the country. A fourth possibility Tom identified, could be the advances in agricultural technology and agricultural chemistry that have eliminated many of the jobs traditionally done by migrant families in Missouri. Another possibility indicated by Tom, was the changes made to the federal policy in 2008 that specifically affected processing plant migrant workers. In 2008, the federal government changed the definition of "temporary employment." The new definition defines temporary employment to include employment in year-round jobs only if that state is able to document that workers in those positions typically do not stay in those positions, with the same employer, for more than 12 months (Improving the Academic Achievement of the Disadvantaged; Migrant Education Program; Final Rule, 2008). Tom said:

For the processing plant workers there's been some, there were some changes in the 2008 guidance. That made it much more difficult for us to identify ...not identify, but declare some of the people eligible based on temporary employment, compared to the way it used to be...Then in 2008 that was changed to where they had to tell us they were going to move away in a year, in less than a year...now they have to tell us I'm only going to be here until May, or I'm only going to be here for this long, or we're planning on moving away again. And a lot of times they just don't know. They don't know what they're

going to do five months from now. Most cases they go ahead and move; but because they weren't able to tell us that when we found them, we had a hard time signing those people up. So that's been... You know, those factors are what's caused us to go from our peak around 4,500, now around 800.

Arguably, the 2008 federal policy change likely had an impact on Missouri's migrant students.

Migrant redefined: conflicting beliefs on how to define migrant students. Part of MELL's challenge in identifying students appears to result from changes in the federal policy as well as MELL's perception of how to interpret the federal changes. As such, Tom believes there is a better way to identify migrant students in Missouri that would focus more on the historical patterns of movement.

The 2008 change in the federal policy redefined "temporary employment." The new definition of "temporary employment" is employment that is less than 12 months. "It may include employment that is constant and available year-round only if the State documents that, given the nature of the work, virtually no workers remained employed by the same employer more than 12 months" (Improving the Academic Achievement of the Disadvantaged; Migrant Education Program; Final Rule, 2008). This change in policy could be the result of pressure placed on the federal Office of Migrant Education to differentiate between the follow the crop migrants and the processing plant migrants, according to Tom. Regardless of the rationale for the policy change, the new definition appears to be making it more challenging to identify migrant students in Missouri; thus making it more difficult to provide services and creating difficulties in implementing the MEP.

Initially, the MEP was designed for migrants following the crop to address gaps in instructional time and health related issues. However, Tom explained that many migrants are now working in processing plants to make money during the off seasons. Though the processing plant work is difficult and dangerous, it does not present the same level of health issues associated with working in the fields with crops.

Arguably, this redefining of the MEP's target population creates problems in simply trying to identify migrant students. Prior to the 2008 change, MELL was able to identify migrant students based on job classifications at the processing plant. Since the 2008 policy change, MELL must ask specific questions that migrant families may not want to answer out of fear of losing their jobs. Tom explained that migrant families must be asked if they intend to stay at that job for at least a year. This is possibly just MELL's interpretation of the 2008 federal policy change. The result is that Missouri may have unidentified migrant students because MELL believes they cannot interpret the policy any differently. This presents an interesting situation given that MELL is an intermediary organization. If MELL does not believe they have the ability to interpret and implement the policy in a way that best suits their local needs, then it could be suggest that MELL may not realize the scope of their role. Perhaps, the basis of their perception is the Director's need to be in compliance. Perhaps, the basis of the perception is the Director's knowledge of how to interpret it differently; or perhaps, the driving force is the Director's lack of will to interpret differently. Regardless of whether the basis of the perception is a lack of will or a lack of knowledge, or possibly both, it is apparent that the Director's need to feel compliant overshadows any other possible interpretations.

Tom argued that a better definition of what constitutes a qualifying move would include information about the family's history of moves:

...if we were able to identify people more on history of moves, if they have a long history of moving when we find them, that's some of the factor. Especially if they're kind of iffy about how long they're going to be there. We can kind of look at that. And look at trends and just different things that happen over the years.

Tom's differing perspective on how to define and identify migrant students highlights complexities in policy implementation. Although MELL does not necessarily agree with what constitutes a qualifying move and the new definition of temporary employment, MELL does not believe it has the authority to interpret this definition any differently. Arguably, MELL is not adapting the policy to meet their local needs. This implies that there is either a lack of will or a lack of knowledge on how to adapt the policy. Given that Tom presented a possible alternative, this suggests that there is an apparent lack of will to adapt and interpret the policy differently. While Tom believes MELL is being consistent with federal policy, he defines a better alternative that could be a better solution to the challenges MELL has in identifying migrant students. Given that MELL defines the identification process in Missouri, and that the 2008 federal definition has a statement that states can make the determination if a certain job qualifies if it has employees that stay less than 12 months, this suggests that MELL is being counterproductive and acting against itself. The federal policy grants the states, and in this instance, specifically MELL, the authority to define a process by which migrant students could be identified differently. However, MELL does not appear to acknowledge they have that authority. Whether

it is the Director of MELL's fear of noncompliance or a sheer lack of will, it is apparent that MELL could be adapting the policy differently than they are.

There are several potential consequences and implications around this conflicting view. First, this conflict contradicts MELL's role as an intermediary because they simply enforce federal policy. However, MELL could interpret the redefinition of temporary employment to include information on the family's historical moves. Furthermore, Tom explained that MELL does not want to be viewed as noncompliant by the federal government. This implies that MELL maintains a very conservative, almost cautious, definition of a migrant student. The result is that there are probably unidentified migrant students in Missouri not receiving their entitled services.

What becomes clear is how vitally important the definition of migrant student is to the identification process. Unidentified migrant students are not eligible for services provided by the MEP. Furthermore, it appears that while MELL, according to Tom, does not agree with the federal definition that sets the standard by which they identify migrant students, they do not believe they can ethically interpret it any different.

MELL's Focus on Access to Educational Opportunities

Access to educational opportunities is another finding that relates directly to the second research question: *How does the Missouri Department of Elementary and Secondary Education (DESE)'s Office of Migrant Education, ELL, Immigrant & Refugee (MELL) interpret and implement the federal Migrant Education Policy?* Citing federal laws such as the Equal Education Opportunities Act of 1974 and Title IV of the Civil Rights Act, Tom was very explicit in emphasizing that every student is entitled to an education. Combined, these two laws prohibit discrimination based on race, ethnicity, and gender and require schools to provide programs and

resources to aid ELL students in overcoming language barriers. Furthermore, Tom explained that the Title I.C (migrant) and Title III (ELL) federal funding schools receive:

...is basically just supplemental to what the federal law requires them to do in the first place. But we know that the Civil Rights Act requires them to provide an adequate education to these children and there have been other... There have been appellate court cases, Supreme Court cases, there have been guidance from the Feds, Equal Educational Opportunities Act, and all these different things kind of describes what that adequate education means. And they all say that you have to, they have to have a grasp of the English language. They have to be proficient in English in order to receive an adequate education. ...it's the school district's responsibility to provide the children with the language instruction they need to be proficient, or to go out there and participate in our society. So it's all a local responsibility. So what federal dollars they get has to be on top of what they have to spend locally. So it's just supplemental. And that's sometimes a hard message to get across to people, though.

This message from MELL to the school districts is powerful because it requires districts to provide the resources necessary to educate migrant students and to promote their academic success. Tom's statements suggest that it is the districts' responsibility to provide what is necessary regardless of available resources. Tom's statements also suggest the English language acquisition is required and necessary for migrant students. However, this appears to create an interesting situation. Given that, Tom identified challenges in adapting the MEP's definitions to identify migrant students in Missouri; this emphasis on providing access is somewhat counterintuitive. Migrant students have to be identified before they can be provided services.

Perhaps the emphasis on access to services is MELL's way of substantiating their identification process. Perhaps, this is just simply MELL's implementation of the MEP by providing knowledge to school districts.

In complying with this message, districts must provide English language instruction to migrant students that need it. Districts are required to have certified teachers regardless of the number of migrant students and/or English language learner students. However, these requirements pose budgetary constraints on many small districts. Tom said:

...there are so many people out there who don't have that qualified, certified person teaching the language. So actually, they're in violation of the Civil Rights. And that's a message I try to get across to districts a lot; that you are in jeopardy of a Civil Rights violation by not having an ESL endorsed teacher on staff. It doesn't matter...and these are individual rights granted by the Constitution, so it doesn't matter that you only have ten kids. You have one kid; you have to provide them with that adequate education. So that's something that's really difficult in this state to really get to take hold. Some districts will do that, but a lot of them are not. And right now we're in a place in history where on a regular basis I get phone calls saying hey, these kids just moved in. What I do? And I'll start to explain it to them. Well, how am I going to...? Well, that's really up to you, but you've got to do it. I feel sorry for these districts when this happens, when kids just show up and I'm the guy telling them you're going to have to make some budgetary changes because I know none of them have any money just laying around to do these things. It's hard times.

According to Tom, MELL's message is very clear. Available money or not, an adequate and equitable education is necessary and required regardless of how long the student is in that district. Tom's statement suggests school districts' unwillingness, or a lack of will, to provide what is necessary to migrant, and other ELL students, specifically ESL teachers. It also suggests that school districts lack of knowledge on exactly what they are supposed to do. Given Tom's other statement about emphasizing access to services, this statement seems to contradict his previous one. If MELL were emphasizing access to services, then it would be logical to assume that districts are aware of their responsibilities. However, this contradiction appears suggests that there is a miscommunication or a communication breakdown somewhere. Perhaps the districts Tom is referring to are districts in 'new' communities that have no knowledge or experience with this population of students. However, it seems strange in this modern and technological world that districts would be completely unaware of their responsibilities and obligations, suggesting the issues are more a result of a lack of will than a lack of knowledge, as was suggested by Tom. While MELL's interpretation and implementation is clear on this point, from their perspective, it appears there is a miscommunication or something interfering with how districts are supposedly complying with this policy goal. Perhaps districts do not realize that failing to comply with this could cost districts thousands more in fines than a teacher's salary would have cost them. Additionally, having a reputation of being unwelcoming or inequitable could be damaging to the district and the community it serves. Furthermore, failing to provide access to educational opportunities hinders migrant students' academic achievement and success.

MELL's Interpretation of Promoting Academic Achievement and Success

The third piece to understanding Missouri's interpretation and implementation of the MEP is its focus on migrant student's academic achievement. While this not a specific outcome of the federal policy, it is the premise of several of Missouri's MEP outcomes, as stated in the CNA Report. Though the CNA Report outlines how academic achievement and success are measured, MELL does not necessarily agree with how success is determined.

Missouri's MEP promotes academic achievement by providing summer schools and resources to districts to help migrant students reach proficiency at their grade level. With the exception of new immigrants (those in the country less than 12 months), all Missouri students, including migrant students, are required to take the annual Missouri Assessment Program (MAP) test. The MAP determines a student's, a school's and a district's Annual Yearly Progress (AYP) as defined by the most recent iteration of the Elementary and Secondary Education Act, known to most people as the No Child Left Behind Act (NCLB). According to Tom, MELL uses the MAP's disaggregated data for the migrant population to determine progress and needs assessment, "...our program and needs assessment has been focused on how they're doing in communication arts and math." The data obtained is used to determine the level at which migrant students are performing and develop programs to get migrant students performing at the same level as their peers.

According to the CNA Report, migrant students have the same performance targets as all other students in Missouri. These performance targets include achievement in communication arts and mathematics, school readiness, and increasing high school graduation rates (see Appendix H for detailed information). While these performance targets are necessary to demonstrate the state's AYP, they do not account for language disparities. According to the

CNA Report, to meet these targets, Missouri adopted measurable program outcomes (MPO) and statewide service delivery strategies that are meant to guide the implementation and evaluation of Missouri's MEP. These outcomes and strategies are defined in the CNA Report and include strategies like providing professional development, increasing parental involvement, providing access to early childhood education, and providing supplemental instructional services. For each of the listed strategies, the CNA Report provides MPOs. A complete list of these strategies and MPOs is in Appendix I.

Since it is necessary for migrant students to meet the same outcomes and targets as all other students in Missouri, an understanding and recognition of the targets is necessary. However, some of the targets appear to be unreasonable. They are unreasonable because it gives districts only one year to meet the target. For example, the CNA Report states "80% of students receiving language of math instruction will demonstrate a 9% gain on district-approved semester assessment (such as the language of math portion of the ACCESS assessment)" by the end of the 2013-2014 school year (CNA Report, 2013, p. 29). Given that the CNA Report was not finalized until June 2013, the nine percent improvement expected within the first year of implementation seems to be an unreasonable and unrealistic expectation. While it is good to set clear expectations, unrealistic expectations may set districts and migrant students for failure; rather than success. Expectations like this one appear to demonstrate Missouri's desire for migrant students to succeed academically; however, there is no mention of any resources or assistance provided to districts to aid them in accomplishing these apparent unrealistic expectations.

The MAP does not account for language barriers. One of the problems associated with migrant and ELL students taking the MAP is that the test does not account for any language

barriers. As such, Tom does not believe this is a fair assessment of academic preparation and academic achievement. Although there are some accommodations (i.e. some parts are translated) for these students, the MAP does not consider language differences in its design, according to Tom. However, the mandate that all students must take the MAP test forces MELL to consider the results. Additionally, Tom, Ben and Jen, RPDC administrators, argue that a fair assessment of ELL students, including most migrant students' knowledge and proficiency would be to stop requiring them to take the MAP test until they have achieved a certain level of language proficiency. Tom said,

First, they wouldn't take the test until they reached a certain level of proficiency in the language. I would use...If I had my way and was able to...We would be more concentrated on gaining the language skills necessary to understand what they're being tested on first.

What is evident from Tom's perspective is that requiring migrant students to take the MAP test does not provide sufficient evidence on their academic growth. As a result, basing success and failure on the MAP scores promotes inaccurate conclusions about academic growth and achievement. Furthermore, it adds more evidence to Tom's claim that MELL chooses not to interpret policies differently and can only enforce policies given to them. However, as the state office responsible for implementing the MEP, it seems peculiar that MELL would be unable to interject and interpret the policies and implement them in a way that would promote success of the migrant student while still meeting the defined outcomes. Although Tom did indicate that he has had conversations with individuals at the OME and other states' directors to discuss policy interpretations, the MAP is Missouri's gauge for student achievement and success and, therefore,

MELL must comply with DESE's requirements. One possible alternative, indicated by Tom, to measuring migrant student's academic success would be the use of the World-Class Instructional Design and Assessment (WIDA) ACCESS test rather than the MAP.

All ELL students, including most migrant students, are required to complete an annual language proficiency assessment known as ACCESS. In 2010, Missouri joined the World-Class Instructional Design and Assessment (WIDA) consortium. According to Tom, the WIDE consortium promotes educational success of ELL and migrant students by providing research, professional development, assessments, and instructional materials based on researched best practices. Through the WIDA consortium, Missouri has access to and uses the WIDA-ACCESS Placement Test to measure English language proficiency of students. Ben, a regional administrator, said,

...we have a pretest, mid and post-test, and then students come in and we pretest them all at their grade level. But that doesn't mean that's where they'll stay, because then what we do is we look at the pretest and then, based on their scores of where the need is, we might advance them...They might go to the next grade to see if that's where they want to be. But we're finding a lot of the students are scoring lower, so if they're scoring less than a 5 then we'll pretest them at the lower grade and see if that'll help them.

Since every ELL student is required to take the ACCESS annually, Tom, Jen and Ben, regional administrators, argue that the ACCESS test should be used in lieu of the MAP test until ELL students have achieved a certain level of proficiency. Furthermore, if MELL had a voice in how ELL students' AYP was measured, they would recommend using ACCESS. Tom said,

We would use their language proficiency [ACCESS] as their state assessment [MAP]. We are required every year to give language proficiency assessments and there we're expecting growth, we're expecting to transition out from language programs into the regular classroom and be able to function on their own without needing assistance. So let's do that. The research would show that it's not until they gain a certain level of proficiency that they really understand what the test is asking them in the first place. So [to] not even do the testing of them until they reach a certain level of language proficiency.

Tom's statement indicates a conflict between what MELL knows to be best practices for measuring student achievement, and how the state defines what measurement may be used to determine student achievement. Arguably, MELL does not lack knowledge of how achievement and success should be measured. Additionally, MELL does not appear to lack the will, given Tom's frustrations in having to measure achievement using the MAP. Perhaps, the issue then is the Director of MELL's desire to be compliant.

Given the frequent mobility of migrant students and variation of resources and curriculum between districts and states, requiring all migrant students to take the MAP test may not be an accurate reflection of their knowledge and skills, especially if the migrant student does not have English language proficiency. Furthermore, the same outcomes, targets, and benchmarks as all other Missouri students measure migrant students' academic achievement. This lack of differentiation creates challenges since the migrant student may not be in Missouri for a lengthy enough period to allow districts to make enough academic progress with the

migrant student that their MAP scores would reflect positive achievement growth and proficiency in the state's required areas.

While MELL disagrees with the requirement to use the MAP and not the ACCESS, they do analyze the MAP results to determine growth and success of migrant students, statewide and by district. Their perspective, however, does not appear to alter their implementation. Perhaps this is because the Director of MELL is adamant about complying with the requirements.

Additionally, the lack of differentiation does not account for all the challenges migrant students must overcome. How can it be reasonably expected that migrant students will reach the same benchmarks as white, middle-class, English speaking students if there are not differentiations and accommodations for their language disparities? Simply put, it cannot be expected. While holding migrant students to the same standard as all other students presents benefits, evaluating their achievement through a test that is known to have faults, does create problems. In relying on the same instrument without allowing differentiation, suggests that Missouri is not acknowledging the unique needs of migrant students. Arguably, this suggests a lack of will or lack of desire to see migrant students attain academic success in Missouri. It could also suggest that the lack of will and lack of desire to allow differentiation for migrant students is the result of lack of an official state policy. While it is clear that Missouri has a policy, perhaps the creation of an official Migrant Education Policy by the state legislature would force DESE (and MELL) to differentiate MAP outcomes and targets that make allowances for migrant students so that their achievement is appropriately and accurately measured.

Summary of the State (intermediary) Level Implementation

What becomes clear in understanding how MELL interprets and implements the MEP, is that there are apparent conflicts in how MELL believes the policy should be implemented and how the policy is being implemented. Although MELL should be able to interpret and implement the policy based on the needs of their migrant population, they have an apparent need to be compliant that hinders their ability to adapt the policy in ways that would, potentially, allow the policy implementation to be more in tune with the target population. As such, MELL's policy interpretation and implementation is complicated because it appears to contradict what they believe to be best for Missouri's migrant students. Honig (2006) and Owens (2014) suggest that policy implementation is not only messy, but also complex and uncertain, as it is reflective of the implementers will and capacity. This appears to be an accurate description of MELL's implementation of the MEP. MELL's implementation focuses on the primary themes of MELL's perception of their role, Missouri's MEP, identification, access, and academic achievement. What becomes clear is that unpacking these into individual findings is that they are not independent; rather, they have a connected dependence on each other. Identification is the key to providing or denying migrant students access to additional, supplemental education resources. Migrant students must be identified to improve their academic achievement. Providing access to an adequate and equitable education is necessary to improve migrant students' academic achievement. This connected dependence complicates the policy interpretation and implementation and highlights how messy implementation really is.

Furthermore, Missouri's unofficial Migrant Education Policy puts MELL in an awkward position trying to navigate the space between the federal defined MEP outcomes and the CNA Report's define outcomes for Missouri's MEP. Within this awkward space, Tom believes they

have no room for differing interpretations or implementation beyond the scope outlined and defined in the CNA Report. This creates a conflict that could, arguably, be impacting the way MELL implements the MEP because they do not necessary believe in or agree with their implementation. Additionally, the CNA Report outlines that all migrant students will be held to the same accountability standards as all other Missouri students indicating that migrant students do not need allowances or differentiation. This could be seen as an impediment to migrant students achieving academic success.

While MELL stresses the importance of access to an equitable education and identification of migrant students, according to Tom the school districts are the gatekeepers of such things. This means that the school districts are the street-level bureaucrats (Birkland, 2011; Honig, 2006a; Honig, 2006b; Lipsky, 1979, 1980, 2010; McLaughlin, 1987; Weatherly & Lipsky, 1977) that enact the policy within their local contexts. They have the daily responsibility of implementing the policy to the targeted population. As such, the school districts are the final determiners of who will be identified as migrant students and who will be granted access to the specific migrant resources. While the state, via MELL, can interpret the policy and define how they will implement the policy, they are an intermediary organization (Honig, 2006a; Owens, 2014) mediating between the federal enactors and local street-level bureaucrats. Ironically, MELL believes they do not have the power to adapt the policy to implement the MEP in an appropriate way that truly aids and benefits the migrant students. To aid in their interpretation and implementation, MELL enables the Regional Professional Development Centers (RPDCs). Essentially, granting the RPDCs the ability to mediate between the local school districts and

MELL; therefore, establishing a second intermediary organization in the Migrant Education Policy implementation process.

Regional (Intermediary) Level Implementation

This section will address the third research question: *How do the regions interpret and implement the federal Migrant Education Policy?* To answer this question, a brief overview is provided of the role of the Regional Professional Development Centers (RPDC), as it relates to migrant students. The regional (intermediary) level implementation strategies focus on challenges in identifying migrant students, access to educational opportunities, and academic achievement.

There are seven instructional specialists in five MELL regions and five migrant identification specialists in five RPDC regions. While there is some overlap between the MELL regions and the RPDC regions, they are not identical. These individuals are the regional implementers. The instructional specialists provide districts, schools, and teachers with instructional materials, best practices and policy interpretations for migrant and English Language Learners (ELL). The migrant identification specialists, also known as recruiters, help to identify migrant students and serve as liaisons between the schools, the state, the community, and the families. While these individuals serve migrant students and report to the Director of MELL, they also report to the Director of their Regional Professional Development Center. Essentially, these individuals have two bosses that sometimes contradict each other and sometimes have competing interests, as was indicated by Ben and Jen, two regional administrators. An illustration of this relationship is below in Figure 3. These regional individuals serve as intermediaries (Honig, 2006a; Owens, 2014) between the state (MELL) and

the school districts. As such, they implement Missouri’s MEP within the context of the federal policy and within the context of their individual local areas.

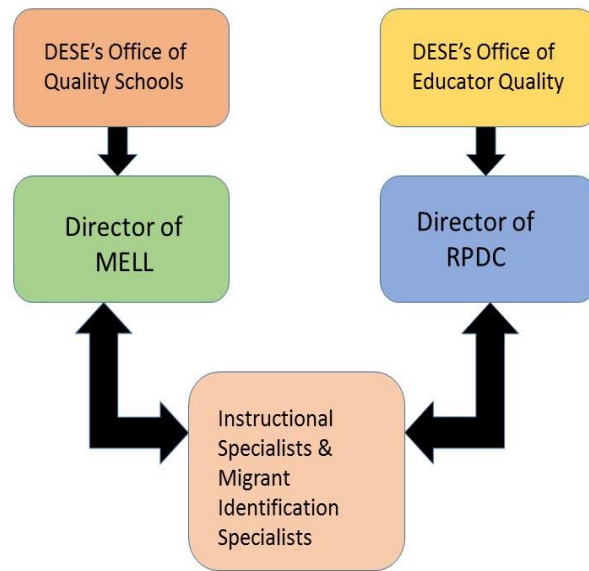


Figure 3. RPDC Reporting Structure

RPDC Concerns with Identifying Migrant Students

Ben, a RPDC administrator, explained that he believes one of the key roles of the RPDC is in adequately identifying migrant students so that districts are able to provide them with an equitable education. At this level, migrant identification appears to be a cause for concern because many migrant students are not being identified. Ben explained that “so far [the] Southwest and Southeast [regions] are really the only places that are identifying all the migrants that should be identified.” This statement relates to concerns expressed by Tom in identifying migrant students. Tom explained that the identification problems relate to the change in the federal definition of “temporary employment” in 2008 (Improving the Academic Achievement of the Disadvantaged; Migrant Education Program; Final Rule, 2008). However, Ben and Jen, RPDC administrators, identified other possible reasons for the identification problems, including

recruiters not made to do their jobs and recruiters not asking the 'right' questions. This suggests an issue with MELL enforcing or, perhaps, articulating how to find and identify migrant students. This could also suggest a lack of knowledge on the part of the recruiters, or simply a lack of will to find and identify the migrant students. However, Louise, another RPDC administrator, contradicted Ben and Jen explaining that recruiters are finding and identifying migrant students. Furthermore, Ben and Jen's sentiments contradict Tom's statement about training recruiters to identify migrant students properly. These contradictory views suggest communication problems between MELL and the RPDCs. Tom and Louise argue that recruiters are finding and identifying migrant students, but Ben and Jen suggest they are not. Somewhere in the process, there is a communication breakdown or a communication misunderstanding that is causing these individuals to have contradictory views of how the identification process is working.

RPDC administrators' perceive a lack of knowledge on how to identify migrants.

One of the possible reasons for the identification problems that Jen stated is that recruiters are not made to go out into the field and identify the migrant students. Jen said,

I have a recruiter in my office who does not leave the office. I have told her that she needed to...But this boy from Guatemala, she [the recruiter] went to the school. They didn't even ask for her. They asked for me. She asked the wrong questions. She didn't even ask questions, according to the principal, and she says he don't qualify. I went, found the history of the boy, found out why he came, and I was able to identify him. So she got upset because I identified him.

Jen's perceived concern suggests a lack of will, or desire, (Birkland, 2011; Fowler, 2013; Honig, 2006a) on the part of the recruiters. Arguably, the recruiter clearly does not have the desire to take the time and properly investigate all potential students that could be identified as migrant. Furthermore, it appears that this recruiter lacks the capacity, or knowledge, (Birkland, 2011; Fowler, 2013; Honig, 2006a) of the identification requirements and the policy as it pertains to identifying migrant students. Lacking will and/or lacking knowledge to implement a policy makes policy implementation problematic, at best (Honig, 2006a; Owens, 2014). What is unclear is if it is the recruiter's lack of will or lack of capacity that keeps the individual from adequately and appropriately identifying migrant students, or it could simply be Jen's interpretation of the situation. The evidence suggests there is a potential breakdown somewhere in the implementation process, especially if recruiters are not receiving adequate training and/or lack monitoring. However, Tom indicated that part of his job focuses on ensuring that recruiters receive proper training. This contradiction between Tom, Ben, and Jen suggests there is a communication breakdown between MELL and the RPDCs, because they have conflicting views about the success of the identification process. While Tom may believe he is properly training recruiters, if the effects of his efforts are not noticeable to the regional implementers, then something is not working. These communication problems could be the result of Tom lacking of the knowledge of what is occurring, or what is not occurring. It could be that Tom lacks the will to be more forceful with individuals not properly identifying migrant students. It could also be the recruiter's lack of will causing this perception. Regardless, the conflicting views indicate a communication problem, communication breakdown or a communication misunderstanding

between MELL and the RPDCs. The consequence of this communication problem is that migrant students are not identified and not receiving their entitled services.

A second possible reason for the identification problems is that recruiters are not asking the right questions. This suggests a lack of knowledge of what questions to ask and the appropriate way to phrase the questions. Perhaps this reflects a lack of training on exactly what information to solicit from the migrant families to determine eligibility for services. Perhaps it is a lack of monitoring to determine if the recruiters are asking the correct questions. The other possibility is that the recruiter lacks the will to find and identify migrant students. Perhaps better monitoring would encourage the recruiters to do better at finding and identifying migrant students. However, both of these possibilities contradict Tom's statement about ensuring that recruiters receive proper training to ask the right questions. Tom also stated that he monitors the recruiters to make sure they are asking the right questions. Arguably, there is a communication problem. Regardless, it is apparent that the phrasing of the questions can result in migrant families misinterpreting or not understanding the questions the recruiters are asking them. Simply put, recruiters have to ask the right questions. Ben said,

...you have to identify them [migrants] first, and it depends on the question. And this is one thing that we're still, with districts even, because normally you're supposed to ask the question, 'did you come looking for agricultural work?' Well, most are sitting out because [it's] harder to answer the question 'Are you a migrant?' People don't want to identify themselves. But if you ask them, 'did you come looking for agricultural work?' which is a qualifying question under federal law, you'd get more.

Failing to ask the right questions or knowing what questions to ask, results in migrant students not being identified and migrant students not receiving services their entitled services. Furthermore, not asking the right questions indicates a lack of capacity, or knowledge, (Birkland, 2011; Fowler, 2013; Honig, 2006a) of how the MEP defines identification and how MELL interprets identification. However, Tom’s statement about ensuring recruiters know which questions to ask suggests that some recruiters simply lack the will to find and identify migrant students. It could also suggest that the provided training is not adequate. Another possibility could be the conflicting priorities between the Director of MELL and the Directors of the RPDCs. This creates challenging situations because regional implementers may not know which director’s priorities they should be following. Ben said, “It’s like having multiple bosses.” Jen indicated having multiple bosses creates conflict for her. Arguably, multiple bosses with differing priorities creates awkward and challenging situations for the instructional specialists and recruiters. Which boss do they listen to? Do they listen to the boss in Jefferson City or the one in their building? It would be reasonable to assume that they are following the Director of their RPDC to create less conflict in their day-to-day working environment. Arguably, part of the conflict is a result of the lack of understanding the RPDC directors have and the need for these RPDC directors to receive proper training on migrant policies and requirements.

Lastly, identifying migrants is a challenge for individuals and districts not familiar with the federal definition and MELL’s interpretation. Several participants indicated that in many instances migrant is viewed as synonymous with immigrant or ELL. Louise, another RPDC administrator, explained that her perception is that “the word ‘migrant’ is really controversial or confusing because of the word immigrant’ and if you are confused, you might mark off

‘migrant,’ but they’re actually ‘immigrant.’” Additionally, Jen commented on the misunderstanding in defining the terms migrant and immigrant. Jen explained, “...that’s something we struggle with all the time, because [districts] think if the [student] has a Hispanic surname, they’re migrant/ELL. If they don’t, they probably aren’t. So [districts are] assuming that migrant and immigrant are somehow synonymous.”

The sentiments expressed by Louise and Jen highlight the lack of knowledge, or capacity, (Birkland, 2011; Fowler, 2013; Honig, 2006a) individuals and districts have about migrant students and the MEP. These sentiments also suggest that school districts and individuals lack will, or desire, (Birkland, 2011; Fowler, 2013; Honig, 2006a) to appropriately identify these students and provide them with the access and their entitled educational opportunities. Furthermore, these sentiments suggest a lack of will, and a lack of capacity to implement the MEP appropriately and adequately.

A better way to identify migrant students. Not properly finding and identifying migrant students means that there are students throughout Missouri who are likely not receiving educational services they should be receiving. One possible way presented by Ben to remedy the identification problem was to consider the patterns of movement, where the student was prior, and whether or not he/she was previously identified as migrant. Ben said,

It was either last year or the year before that I took all the current data that we had and I crunched numbers and everything, and in every region there was at least enough for one grant that they’re not getting. All those different ways to find kids...The recruiter’s like oh, they’re not there. Well, I just found 37 in your region that you don’t know about. So I think we’re only identifying, I would guess, maybe 60 percent of all migrants here.

Because you can go through that national database and see where they come from, and it's like a black hole, depending on where they're at here. And then they leave and they're all of a sudden identified in the next state. But the pattern's the same. And that's what I look for, is patterns.

Similar to the frustrations expressed by Tom, Ben arguably feels powerless to identify migrants differently than how the federal government dictates.

Identification redefined. Although the regional participants did not necessarily agree with the federal MEP's definition of migrant, including what constitutes a qualifying move, they do not believe they have the authority to interpret this definition any differently because the federal definition is very specific. Their sentiments are similar to the frustrations expressed by Tom. Ben explained that, "...if you look at the migrant definitions, they're specific. And there used to be a lot more then there are now." Ben's sentiments are similar to Tom's in that the 2008 federal policy change has influenced the way Missouri's migrant students are being identified. Furthermore, the 2008 federal definition change of 'temporary employment' also triggered a change in who was allowed to do the identifying. According to Ben, prior to 2008, states had greater flexibility in determining and identifying migrant students. Ben said,

Arkansas used to have welcome centers in the state. And then they would, every migrant they would ask questions and they'd sign them all up, so it showed that they had a lot of migrants, but when the re-interviewed they found out they weren't in Arkansas at all. They were just passing through Arkansas unto Missouri, Michigan and other places. But Arkansas was counting them. So they had to get rid of that and said they could only

recruit and identify at the district level, not the way the state was doing it. A lot of that was happening back then.

The government's redefining what constitutes "temporary employment" and subsequently, a migrant student, and demanding that districts be the initial point of contact and initial identifier of migrant students reduced the flexibility and interpretive power of states. This change limited the state (MELL) and the RPDCs in how they could interpret and implement the policy. In doing so, the responsibility of initial identification lies with the districts. This means that the regional, intermediary implementers are unable to use their knowledge and expertise about migrants, and about how migrants move, to identify them. The sentiments expressed by Ben and Jen are similar to those expressed by Tom. Each of these participants suggested similar ways to better identify migrant students.

What becomes clear from the data is how vitally important the identification process is. Migrant students that are not properly identified are not eligible for services provided by the MEP. Furthermore, it appears that while the regional participants do not agree with the federal definition that sets the standard by which they identify migrant students, they do not believe they can ethically interpret it any differently, because doing so would violate federal law. As Ben described, the federal definition of migrant is very specific. As such, regional implementers must operate within the boundaries and specifications of the federal definition. The inability of regional implementers to interpret the federal definition differently creates a dilemma for them because they know there are unidentified migrant students and, therefore, not receiving services which they are entitled. Tom, who also felt powerless to adapt the policy any differently for fear of violating federal law, shared this frustration.

RPDC Perceives Problems in Providing Access to Educational Opportunities

At the regional level, access to educational opportunities represents a very important finding for several reasons. First, regional participants, Jen, Ben, and Louise, all mentioned federal laws that demand access to educational opportunities. Second, the regional participants perceived problems in how districts lack the knowledge of what is required, are not forced to abide by what is required, and use discrepancies between federal and state laws to limit migrant students' access to educational opportunities.

RPDCs perceive lack of knowledge. The regional participants perceive that many school districts are unfamiliar with the law, its requirements; and are not sure how to implement it. Ben, a RPDC administrator, explained, "They kind of know what the law is, but they don't know how to implement it in their district." Part of the RPDC's responsibility is to help districts understand the law and develop an implementation strategy. Ben explained that "part of our job is to go in and work with districts to help them fill out those forms, their Title forms and Title reports, improvement plans, all those different things." Both Ben and Jen explained that all school districts are required to have a migrant plan and an ELL plan, but many do not or they combine them. Jen said, "...you'll ask them if they have a plan, and they'll bring out a plan with Title III and Title I.C incorporated together. And I have to explain to them we have to separate them because they're two different items."

What becomes apparent is that some school districts simply lack the knowledge of how to develop implementation strategies, the law, the requirements, and their responsibilities. This could also suggest a need for more training to educate districts about the laws and requirements.

Louise echoed Ben and Jen's sentiments suggesting that the problem is both a lack of knowledge and a lack of training. Louise said,

I think it's just not being exposed to it and maybe needing a little bit more education about what my program [the MEP] is. Or what a migrant's child is. But mainly, I think its educating school districts about what migrant students are, what the program is about. Just because, I mean...you know, that might be the only time in your entire lifetime that you see a migrant child there. ... I understand it's not the school district's fault. How do you know every single program that the state has in education? Because that's [the MEP] not something that's common.

How can districts implement a policy if they are unsure of their responsibilities and obligations? Simply put, they cannot. This highlights the necessity for the intermediary policy implementers (RPDCs) to communicate effectively with districts about the policy, its goals, and the districts responsibilities. In their role, they are supposed to inform the districts of their responsibilities and obligations. If the RPDC administrators are not communicating well with the districts then it suggests that there is a communication breakdown, since the RPDC administrators play a critical role in the implementation process by educating the districts. Additionally, the RPDCs are able to help districts create implementation strategies and plans based on the policy requirements and their knowledge of the local context. If districts do not have plans and policies in place for migrant students, lack knowledge, and lack training of the law, their responsibilities, and their obligations, they are not providing all the services they should be. As a result, migrant students are probably not getting the access to educational

opportunities, as they should be. The question then becomes, how are districts able to remain unaware of their responsibilities, assuming the RPDC administrators are educating them?

RPDCs perceive a lack of enforcement. According to the RPDC administrators, Ben and Jen, school districts are supposed to provide adequate and equitable access to education, including English language instruction; yet, they suggest that some Missouri districts are able to do just the opposite because of a lack of accountability or a perceived lack of accountability. According to the RPDC administrators, Ben and Jen, while MELL (the state implementers) checks the school districts' migrant plans, MELL has limited authority to enforce the federal law because the Department of Elementary and Secondary Education (DESE) does not enforce the accountability requirements of the federal law. This perceived lack of enforcement creates perceived consequences for the regional administrators who are limited by the lack of support.

Ben said,

DESE has no backbone when it comes to any of this. They just say, oh, that's great. But it didn't work? Oh, well, let's try something else... under federal law there is supposed to be [accountability]. But the state won't do it because they said, well, at least they're doing something... I'll be honest with you, with their track record, the state really doesn't do anything as far as making somebody do stuff. They always say, well, it's local control. You know, you can't really force them. But the law says you can.

Arguably, school districts are able to deny or limit access because of a lack of accountability that requires them to do so, and because migrant students are not being identified. This creates a frustrating situation for the regional, intermediary implementers like Ben, Jen, and Louise, because they know the laws and requirements, but do not have the support and authority

to hold districts accountable. Additionally, Ben explained that what is really needed is a better system. Ben said,

We need an organized system to keep everybody working. That's what really... honestly, that's what we need. Because we have the resources. We just don't have the leadership that we need... You know, I mean, because [the Director of MELL] can't do everything from where he's at.

Jen argued that part of this problem was due to a lack of knowledge. She suggested that recruiters and districts need education and that would help to compensate for the lack of leadership and enforcement. Arguably, the regional administrators believe that more support and more leadership would create a system of accountability that would force school districts to comply with the laws, regardless of their local context.

The lack of accountability applies to enforcing both Title I.C and Title III. While federal laws like the Equal Education Opportunity Act, Title III, and Title I.C require school districts to have a plan in place for migrant and ELL students regardless of whether they have any such students or not, many school districts do not have a plan, as indicated by Ben and Jen.

Additionally, Jen and Ben indicated that they are not supposed to behave like the "Gestapo," but at times are almost forced to, because there is no accountability. While their role requires them to support and assist districts, if they lack the authority and the support from DESE to demand districts to comply with the laws and regulations, it creates a frustrating situation. Ben said,

You don't say I'm going to come after you, but you say, you know, do you realize under Title III this is what the law says. This is what you're supposed to be doing under Title I.C. And they're all like, we don't have kids. And it's like, but the law doesn't say only

if you have kids. It says every district shall have a plan regardless...they are now having to do it because, at least in my region, I'm forcing them to because I'm visiting them and going, hey, guess what. I'm here. Let me see your plan. And are you doing it? But they're still reluctant to do it because they say well, we don't have the resources. So those kind of, type of things.

What becomes clear is that the RPDC administrators believe they have to force school districts to comply without having the support and authority to. This creates frustrating situations for the intermediaries because they cannot implement the MEP the way they are supposed to because of the reluctance of the districts to comply. This is exaggerated further by the perception that DESE does not enforce or require accountability to ensure district compliance. The situation is further complicated because of apparent discrepancies that exist between state law and federal law, as described by the regional administrators.

Discrepancies between federal requirements and state requirements. There appears to be a discrepancy between the state law and the federal law regarding the requirements for an ELL teacher. This is important because much of Missouri's migrant student population needs English language instruction. Ben, explained that "under federal law, and this is what the law says, every district shall have a qualified teacher to teacher English Language Learners just like they're required to have for any other population. That's the federal law." Ben further stated that the state law says that "if a district has 19 or more ELL students, they're required to have a certified teacher. Before then, they're not." Ben and Jen, also agreed that many districts believe they are not required to have a certified ELL teacher until they have enough ELL students, around 46, to receive a supplemental Title III (ELL grant). Ben said, "...if you're a district and

you have 30 or 20 kids, then you have to find a teacher out of your own funds.” The basis of this misunderstanding is in the “supplemental” aspect of those federal grants. According to Ben and Jen, the federal government defines supplemental as money to provide extra services. A certified ELL teacher is not considered an extra service and therefore not supplemental, according to Jen. Ben said,

ELL is different from migrant, because in the ELL program there’s requirements ... there are federal requirements that every district, whether you get funds or not, has to do. And then Title III is supplemental to those requirements. And so that’s like hiring a teacher...Just like you’d hire a teacher for special education, or everybody else. That’s so you can’t pay with Title III funds because a district is required under federal law [under the Civil Rights Act and the Equal Educational Opportunities Act of 1974] to have those qualified teachers anyway. So those are the things they have to be careful about.

The regional administrators suggested that the result of the differing definitions is that school districts may be able to use the Missouri definition as a loophole to providing (or not providing) access to English language instruction to migrant students and other ELL students. This creates implementation problems for the regional intermediary implementers. If districts are using state law to trump federal law, and regional implementers do not have the authority to enforce the laws and the policies, this can result in migrant students being denied access to services that are entitled to under federal law. This creates problems in the implementation process because the regional implementers know this is happening, but can do nothing about it. The situation is further complicated by the stronghold of the local context.

RPDCs perceive local control as hindering access to educational services. While school districts are required to supply adequate resources (teachers and money) to ELL students, which include many of Missouri's migrant students, policy intermediaries like the RPDC administrators perceive that many school districts are not doing this because of loopholes in the state law. Ben and Jen emphasized how they are constantly reminding school districts what the federal law is and what is required. However, these participants believe that school districts are going to do what they want to do and what their community demands and expects. Ben explained,

When I tried to start a program and the district, the biggest district there, said well, our parents, our community won't let us do it because of [who it is and what it is for].

They'll say because we're not helping these other kids, why should these people [migrant students] be special? ...Because they are in control. And Missouri is a local control state. And so everything boils down to whether they want to do it or not. Now even programs where they have to, because they're getting federal funds and because they're supposed to do these things, they all come down to whether they want to do it. If a district doesn't want to do it, then they won't.

Perhaps the issue is not one of locally controlled districts lacking the will, as suggested by Ben and Jen. It could be more an issue with lacking the financial abilities to do what is necessary. Tom explained that many districts with migrant students are financially constrained and finding room in their budgets to do what they need to do is often a challenge. As such, it Ben and Jen's sentiments could be reflecting the financial struggles districts often encounter and the choices they are forced to make.

Access to educational services and opportunities for all students, including migrant and other marginalized student populations, is granted under several federal laws, but is sometimes hindered by locally controlled school districts. While regional administrators remind districts of their legal obligations, they cannot force districts to do anything. The regional administrators also made it clear that as long as districts are not held accountable to providing access to education, migrant students may not be granted the same education opportunities that other students are. This creates challenges for the regional implementers. If districts are not receptive or are unwilling to do what they need to do, the regional implementers are unable to implement the policy adequately. If this impedes migrant students' access to educational opportunities, it also affects their academic achievement. Furthermore, it suggests that some districts lack the will or desire, and lack the capacity, or knowledge, to implement the MEP, at least from the perspective of the regional implementers.

RPDC Administrators Believe Language Proficiency is Necessary

While English language learning falls under Title III, the MEP implies English language learning because many Missouri migrant students need English language instruction to achieve language proficiency and content proficiency, according to Tom, Ben, Jen, and Louise. Additionally, language acquisition is necessary for the families because students often act as interpreters for their families, according to Ben, Jen, and Louise.

Promoting academic achievement and academic success is one of the foundational elements of the federal migrant education policy (Title I, Part C Draft Non-Regulatory Guidance, 2010) and of Missouri's interpretation and implementation of the MEP (CNA Report, 2013). Since Missouri's structure is such that the migrant and ELL programs fall under the same office,

the regional administrators discussed, at length, how migrants are tested and assessed on their language proficiency and their content knowledge, when applicable. According to Ben, the instructional specialists work with teachers, districts and any educational agency in the state that needs assistance with their ELL and migrant students. Jen further explained, that sometimes this means translating or interpreting between the school district and the parents, if the family is Spanish speaking because most of the instructional specialists and migrant identification specialists are bilingual. While the regional participants agree that migrant students need English language instruction, they do not believe the MAP demonstrates their academic growth because it does not account for language discrepancies.

Ben, Louise and Jen's unique positions as policy intermediaries, allows them flexibility to meet the needs of teachers, districts, and sometimes families. Since the RPDC administrators know what the MEP is supposed provide, they are able to interpret it, and help districts implement the policy for their students. Additionally, their bilingual skills allow them the ability to establish relationships with families. In their role as policy intermediaries, the RPDC administrators are able to wear multiple hats and implement the policy to the best of their abilities. As such, regional administrators work with districts to ensure that migrant students are getting the language skills they need to be academically successful. Additionally, the language skills provide benefits to the family.

Language proficiency for families: migrant students as interpreters. Language proficiency is not only important for migrant students to achieve academic success, but also to the families of the migrant students. Louise explained that many migrant students in Missouri serve as interpreters for their families. The problem identified by Louise is that students should

not be burdened to act as family interpreters, because most of the situations are typically beyond the child's skill, knowledge, and maturity level to fully and appropriately understand; as such, the child may not be able to appropriately interpret for the family. Louise described how she works hard to find interpreters for families, rather than having the student doing the interpreting, because of her personal experiences and because there are many instances where the subject matter is beyond the child's vocabulary skills. Louise said,

I am really against a child being, serving as an interpreter. That's mainly because I was an interpreter, so that's one of the greatest rules is never allow a child to interpret. Two, they are federally qualified medical homes that tend to have interpreters available. So it's always our first choice, especially for migrant families, because I will call a place and be, like, making sure that either a live interpreter is available, or if not, a language line. So, kind of knowing that in [my area], being aware of those safety net clinics that we have here, I kind of know what clinics will be better to serve what kind of clients. If someone speaks Somali, I know that one of the clinics tends to have services that are more accessible to Somali speaking families than others. To try to make that easier for the family. I don't want them to be struggling, trying to find someone...especially because health care is so delicate. Even if they bring a friend who is bilingual in that language, medical terminology is its own language.

In general, Louise's bilingual skills allow her to interact with most migrant families. However, she does occasionally have to find interpreters to help her communicate with families whose native language is not Spanish. Additionally, she tries to make sure she is referring families to facilities that have the resources to communicate with them, regardless of the native

language. Furthermore, Louise is against children interpreting for their parents because it allows the children to focus on their schooling without interruptions. Louise provided one example when she was at the family home talking to the parents and the children were working on their homework and listening to language tapes. Since Louise was able to communicate with the family, the children were able to focus on their homework. Had the family spoken a language other than Spanish, Louise would have had to find an interpreter or the child would have had to interpret, and not had time to work on his/her homework. The other potential problem is that the child does not have enough English proficiency to understand fully what Louise was saying and could have misinterpreted the message to the family. As a result, Louise strives to ensure that she or another interpreter is available when items need discussed with the family. This is one way that Louise interprets her role in implementing the MEP.

Additionally, regional participants explained that migrant students' interpreting for their families is just one part of the child brokering that occurs. In many instances, there is a role reversal of responsibilities between the child and the parent(s). Jen explained that role reversal existed, "to where the kids are becoming their parents and the parents are becoming the kids." Migrant students, especially the older kids are doing more than just translating for their parents. Ben said,

They end up being the ones that are not just translating [and interpreting], but paying the bills, and finding housing. If somebody gets in trouble, being the ones that are dealing with authorities and all those things. And that's why a lot of it, when the kids are at that age, like 16 and 17 and schools are fighting them to get them to school, they're like, I've got too much other stuff to do. I can't deal with this.

For the families, survival is more than just language acquisition and proficiency. Louise emphasized that language is the gatekeeper to finding resources, communicating in the community, and a better life. Language acquisition and proficiency is vital to migrant student academic success. For the regional implementers like Louise, finding interpreters, serving as interpreters or ensuring districts have interpreters or bilingual staff members, is one way they interpret the MEP. Knowing their districts and their areas, and knowing their migrant populations allows them to provide language resources to the districts, the families, and the migrant students. Additionally, regional implementers' work is sometimes complicated when districts do not want to take advantage of their knowledge and expertise about the WIDA's curriculum or their knowledge about best practices and instructional strategies for language learners, as was indicated by Ben and Jen. It can also be complicated by districts not taking advantage of the RPDCs to learn more about migrant students, their needs, and strategies to engage the families better.

Summary of the Regional (intermediary) Level Implementation

The regional level's role as intermediaries in the policy implementation process means that regional administrators implement the state's requirements and outcomes with the local contexts in mind. They have an understanding of what their districts are able to do and how they are able to meet the outcomes. The regional administrators are able to interpret the MEP for the districts and help the districts figure out what they need to do. The specialists are also able to identify migrant students, promote access to educational opportunities, and support districts in promoting the academic achievement and success of Missouri's migrant students.

The primary findings of this policy level include concerns the regional participants have with the identification process for migrant students, specifically in the way migrant students are not being identified. Regional participants attributed this problem to a lack of knowledge on the part of recruiters to find and identify migrant students, including asking the right questions, which contradicts Tom's statement about training recruiters to ask the right questions. While the concern would suggest a need for the recruiters to have more training, a better solution might be to train and education the RPDC directors about migrant students, the requirements, the challenges, and the policy. Furthermore, the conflicting priorities between MELL and the RPDC directors suggests a lack of communication or poor communication that impedes the instructional specialists and recruiters from being able to fully implement the MEP, and thus fully meet the needs of their migrant students. Additionally, regional participants echoed Tom's sentiments that there is a better way to identify migrants based on their mobility patterns. The concerns the regional participants have about identifying migrants highlight the likelihood that there are migrants in Missouri not receiving their entitled services. Additionally, these concerns appear to constrain their abilities to adapt the policy and implement it the way they think is best.

The second primary finding of this policy level are the problems regional participants perceive in the way districts provide (or not provide) access to educational opportunities. Specifically, Ben and Jen explained that many school districts are unfamiliar with the law and requirements that provide migrant students' access to education, suggesting a communication breakdown between the districts and the RPDCs. Additionally, the regional participants perceive a lack of enforcement by the state to force districts to comply with federal law. They also attributed their perceptions about access to discrepancies between the federal law and state law.

They perceive that districts use loopholes in the state law to deny migrant students access to educational services. Lastly, regional participants suggested that the local demands placed on districts by their communities were hindering access for migrant students. The variety of concerns and challenges regional administrators have about whether or not migrant students are receiving access to services, appears to impede their abilities to adapt the policy and implement it the way they think is best.

The final finding of this policy level is the regional participants' perceptions that language proficiency is necessary for migrant students. Specifically, they suggested that the MAP does not demonstrate academic growth of language learner students. They also explained how they often have to serve as interpreters for families. Louise argued that it is better for her to interpret or to hire an interpreter to communicate with the family, rather than having the student serve as a language broker. The RPDCs' concerns echo Tom's concerns about how academic growth and success is measured using the MAP and not the ACCESS. While these individuals have substantial training in the WIDA curriculum, many districts are not using the RPDC's knowledge to improve their districts' language instruction.

At this policy level, regional participants are often frustrated by challenges that prevent them from adapting the policy in a more appropriate way. Their perceived lack of support from DESE puts them in a peculiar position in their role as intermediaries because they often feel constrained and powerless.

District (Micro) Level Implementation of the MEP: The Street-level Bureaucrats

This section will address the fourth and final research question: *How are Missouri school districts interpreting and implementing the Migrant Education Policy?* In this study, the district

level implementation represents the micro level implementation, or the street-level bureaucrats' implementation of the MEP. At this level, the school districts interpret and implement the migrant education policy to meet the needs of their migrant students in the best way possible. The district (micro) level implementation of the street-level bureaucrats focuses on a lack of knowledge of the MEP's defined outcomes, academic programming, meeting the non-educational needs of migrant students, and district perceptions of parental involvement.

Lack of Knowledge about the MEP's Defined Outcomes

None of the six district participants from five different school districts, could state what the MEP's defined outcomes are. This lack of knowledge would appear to influence how districts' implement the MEP; however, districts' implementation focuses on being compliant per the annual required checklist. While district personnel could not directly identify the MEP federal outcomes, Joe, an assistant superintendent, and Sally, an ELL and migrant coordinator, at Cherry, and Sarah, the ELL coordinator and ELL teacher at Eggs, and Jill, an assistant superintendent at Apples did indicate that they had to provide an annual compliance checklist. Joe, a Cherry assistant superintendent, explained, "I couldn't even tell you what's in the federal program goals...we pay attention to compliance. I'd say it's...our federal funds compliance checklist. So there are certain things we have to do." After reviewing Cherry's and Apples' compliance checklists, it is apparent that the items on the compliance checklist match the outcomes listed in Missouri's CNA Report, which also match the MEP's federal outcomes. The checklist requires districts to explain how their programs are administered, what instructional services they are using, what support services they are providing, the professional development they are providing, and how they are involving parents. The checklist also asks districts to

explain how they are monitoring success and growth of their programs. These checklists must be submitted annually to MELL. Essentially, the checklists ask districts to demonstrate how they are using the federal funds they are receiving.

Additionally, Cherry's administrators, Joe and Sally, suggested that the submission of the compliance checklist and their migrant plan was merely a formality. However, Joe did indicate that their MEP is designed to meet the needs of their migrant students. Joe said,

[The MEP] is such a broad program, the language we use is so broad that we see the plan as more of a compliance issue. It's not driving our program. We've met the compliance issue by submitting our plan and having it approved, but we've written the plan to meet the needs of kids. And we say it in such broad terms that if anybody would ever come we could kind of hide behind our plan's broad language and say this is how we do that. It's not very specific.

Joe's sentiments suggest that the focus of their MEP implementation is on the migrant student needs, regardless of what the requirements and circumstances are. While Joe feels he must justify the use of broad language in his compliance documents, the result is flexibility for him to adapt his implementation to meet the individualized needs of his migrant students. Furthermore, Joe's sentiments suggest that knowing what the federal MEP outcomes are is irrelevant, because he will continue to do what is best and necessary for his migrant students. While the apparent lack of knowledge of what the defined federal and state MEP outcomes are, suggests that districts need education and training on how the compliance checklists relate to the federal and state MEP outcomes. However, it is evident that districts do not lack the will to aid and provide for their migrant students.

Arguably, districts' migrant education programs are currently designed to meet the federal outcomes without the districts realizing they are doing so. Despite their lack of knowledge about the MEP's defined outcomes, districts are complying with the reporting requirements; and therefore, the policy outcomes. Additionally, districts appeared to demonstrate their will, or their desire, to provide an equitable education to all students, implying their knowledge of federal laws, despite their inability to name them.

Communication breakdown between districts and the intermediary policy levels.

Intermediary participants, Tom, Ben, and Jen, suggested that they are regularly reminding school districts that they have to provide services to migrant students. Additionally, Ben explained that districts use their local control, and differences between state and federal policies as a potential way to not provide services, and, therefore, limit migrant students' access to educational opportunities. However, district personnel suggest the opposite. Arguably, there is a communication breakdown or a misunderstanding somewhere in the process.

While district personnel did not specially cite the laws or the court cases, every participant interviewed in this study was clear that all children are entitled to an education. Several federal laws require equal access to education opportunities, including Title I.C., and the Equal Educational Opportunities Act of 1974, and supported by court cases like *Castaneda v. Pickard* (1981), *Plyer vs. Doe* (1982), and *Flores v. Arizona* (2000). Statements like Joe's, a Cherry assistant superintendent, "we know we have to have equal access" and Jill's, an Apples assistant superintendent, "we provide every kid with every opportunity" highlight the participants' beliefs in providing equal and adequate educational opportunities to migrant students. Tom, Ben, and Jen explained that they emphasize to districts that federal law requires

districts to educate migrant students. Additionally, Ben suggested that districts try to circumvent their obligations and that he must sometimes force districts to comply. While it appears, the intermediary implementers are saying the same thing as these district participants, Ben's sentiments suggest that there is a miscommunication or misunderstanding between the districts and the intermediary implementers on what the expectations are. Perhaps, the miscommunication lies in the way the intermediaries explain the federal laws and requirements. Another possibility is the districts interpret the information they receive from the intermediaries in such a way that all they really hear is the intermediaries telling them they must provide educational opportunities. Despite the miscommunication, it is clear that districts have the will and desire to provide educational opportunities to migrant students. Additionally, the district administrators' sentiments suggest their lack of knowledge of the federal laws, even though they are apparently aware of the federal laws, even if they cannot name them.

Furthermore, the goal for these districts is to "meet the needs of all students" as expressed by Jane, a Bacon assistant superintendent. Bill, a Duck migrant coordinator, echoed Jane's sentiments stating that the district's goal is to "give them [migrant students] an equal opportunity." Jill, an Apples assistant superintendent, further explained that "the policy is made so that those kids [migrants] have a chance in the world...we want to take away anything that interferes with them having the opportunity to get a good education." Joe, a Cherry assistant superintendent administrator, explained that equal education is about creating "systems of intervention for all kids." The sentiments expressed by these district administrators provide further evidence that policy implementation at the micro level begins with their will and desire to educate their migrant students.

While the participants could not define the federal outcomes, it is clear they believe in access to an equitable education. The statements made by the district participants provide evidence these districts have the will and desire to implement the MEP in such a way as to ensure their migrants have access to what the need to be successful. However, their lack of knowledge of the MEP's defined outcomes indicates a miscommunication between the districts and the RPDCs and MELL. Furthermore, the sentiments expressed by the district participants contradict the perceptions expressed by the regional participants who explained that some districts lack the will or desire to educate migrant students. Additionally, Jane, an assistant superintendent at Bacon, expressed her desire for more communication. Jane said,

We are given information that is very formalized and not incredibly specific. But we do have a great contact at the state who helps us and answers a lot of questions for us. But it is something that we would love to see improve, that communication, because, you know, every situation is different, every family is different, the needs of students are different, and we need to make sure that we uphold the integrity of our programs and do everything to the letter of the law, and it's tough to get answers sometimes. But we do have somebody at the state that's really good at that.

Jane's sentiments of needing more communication further emphasize the apparent communication breakdown that exists between the districts and the intermediary policy implementers at the regional and state levels. Perhaps this reflects a need for more personnel at the intermediary level to help improve the communication between the levels. Perhaps regular meetings and trainings would help to improve the communication between the levels. Since Jane does not mention her regional (RPDC) instructional specialists, perhaps what is needed is

training to improve the relationship between the districts and the RPDCs. Regardless, Jane's sentiments highlight the complexities that exist in working with migrant students because every student and every family has different needs. However, better communication between the district, the RPDCs, and the state can only benefit the services provided to the student.

Despite the apparent communication breakdown, districts have developed their migrant education programs to meet the needs of their migrant students based on the knowledge they have acquired through experience or have been provided by the state and the regional implementers. Arguably, districts' programs and services provide to migrant students could only be positively impacted with improved communication between the state, the regions and the districts.

Districts Believe Migrants Need Academic English

According to the participants, most migrant students in Missouri are also English Language Learners. This is consistent with Kandel (2008)'s profile of migrant farmworkers. As a result, English language acquisition is vital and necessary for them to achieve academic success. It is also necessary because the students often serve as interpreters for their families and because their academic growth is measured using the MAP, which arguably does not account for language disparities. While language instruction is the foundation of Title III, it is not a direct outcome of the migrant education policy. However, participants believe language instruction is implied in the MEP. Migrant students cannot achieve academic success and obtain credits necessary to graduate high school without proficiency in English.

Jane, a Bacon assistant superintendent, and Jill, an Apples assistant superintendent, suggested that while migrant students may be able to pick-up social English, they lack and need

academic English. Jill said, "...they [the migrant students] pick up the social language, but it's that academic language that they're missing." Sarah, an administrator in Eggs, echoed this saying, "...there's a difference between being able to speak social English and then academic English." It is apparent that English language instruction is a necessity for many of Missouri's migrant students.

Furthermore, for migrant students, their frequent mobility creates gaps in their education. Jane, an assistant superintendent in Bacon, stated "they have a lot of holes in their learning because they've moved around from place to place and many times it's a language barrier that they face. Additionally, for some migrant students, formal schooling has been infrequent or lacking. According to Jane, an assistant superintendent in Bacon,

...the thing about our district is that most of our kids are from Guatemala or El Salvador or Honduras. We're not talking about kids that have had a formal education in the country that they're coming from. So when they come they know conversational Spanish, but they probably cannot read and write in Spanish or in English. So it's a little bit different than districts that have students that come from Mexico or another of the prosperous countries that have had a formal education. Most of our kids have not.

Jane further emphasized that when students have not had formal schooling in their primary language, learning content and a new language can be difficult, frustrating, and discouraging for the student.

To help combat some of these challenges, each district's ELL program varies based on their resources and their students' needs. This aligns with sentiments shared by the intermediary participants that explained how districts should develop programs that consider their local

context and needs of their migrant students. Additionally, these programs would include activities designed to meet the state and federal policy goals, since districts are required to submit annual compliance checklists. Joe and Sally, administrators at Cherry, explained how their program is flexible and designed to meet the student's needs, as was echoed by other district participants. Joe said,

...it's a full spectrum of services. The migrant kid...if what's best for that kid is pull-out services and a more sheltered experience, we're going to provide part of the day that way. If the kid is more fluent in English, then we may push in somebody to assist at their peer level. After school tutoring is also available.

All six district participants explained how they use a variety of instructional strategies to help migrant students acquire the language and content knowledge they need to be successful. All the districts in this study employ pullout sessions, some, like Bacon and Cherry, use individualized one-on-one sessions, Bacon uses group sessions, and all districts in this study provide after school tutoring. For these districts, instructional activities depend on a student's level of English proficiency, grade level, and subject matter needs. The Apples district offers a summer reading camp, giving priority to their migrant students, to improve their language literacy skills and increase their fluency in academic English. The Cherry school district has a large summer school program for their migrant and ELL students that focuses on mathematics and communication arts, including language instruction.

The school districts use their abilities as the street-level bureaucrats to interpret the policy and provide a variety of instructional activities that meet their individual migrants' needs. The variety of instructional activities they provide, allows them flexibility in their implementation

strategies. The ultimate goal for these districts is to see their migrant students achieve academic success. Arguably, the districts have the will to create their programs to meet the needs of their migrant students. Although regional intermediaries suggested that some districts were not doing what is necessary or lacked the will to meet the needs of their migrant students, the district participants in this study appear to contradict the regional participants' perceptions.

Perceived lack of resources to meet migrant students' language needs. Research literature on contemporary policy implementation suggests that one of the struggles for street-level bureaucrats is having the necessary resources (knowledge, money, and/or personnel) to implement the policy adequately and appropriately to its intended target population (Birkland, 2011; Honig, 2006a; Honig, 2006b; Lipsky, 1979, 1980, 2010; McLaughlin, 1987; Weatherly & Lipsky, 1977). Several district participants echoed the literature. With the grant money provided under Title III, districts are able to provide after school tutoring and other language acquisition resources. However, under federal law, districts are required to have highly qualified ELL teachers, regardless of their budgetary constraints. Some districts struggle to meet this requirement. Joe, an assistant superintendent in Cherry, said,

I think the challenge for the school district is that we can't always find highly qualified ELL teachers who can meet the needs of these kids always. We have patched it with some really good teachers and some paraprofessionals. We've seen more in recent years, probably more paraprofessionals with a Hispanic background to help us bridge it. That, from my end of it, we are under-staffed in meeting the needs of these kids.

While Cherry's resource struggle is in finding qualified ELL teachers, Jane, a Bacon assistant superintendent explained that she has to be creative with resources. Jane said, "We are so

fortunate in our school in that...What is needed is taken care of. So even if we don't have the funding in Title I.C we still do it. I mean, you kind of have to be creative.” Jane’s statement expresses the will to provide for her migrant students, regardless of whether or not she has the resources to do it. It also contradicts Ben and Jen’s sentiments that locally controlled districts are sometimes influenced by competing community interests. Jane’s statement provides evidence that, at least in her district, migrant students receive some priority when their needs require resources beyond what the Title I.C funds are able to provide.

The lack resources or the need to be creative with resources emphasizes districts’ beliefs that districts will do what they need to do to meet migrant students’ needs, whether districts have the resources or not, they will try to find a way to provide for their migrant students. This emphasizes their will, and the beliefs they hold that influence their interpretation of the policy. This also emphasizes a possible lack of support from the federal government, since they are the entity that provides the grants, to provide adequate funding to districts to accomplish what needs to be accomplished. Additionally, this lack of resources could be perceived, potentially, as a lack of community support, inability of the community to contribute via local taxes or other non-monetary types of support and contributions that are necessary to provide adequate funding and resources to the districts to allow them to meet the needs of their migrant students.

The resource struggle not only affects the students in the classroom, but also lacking bilingual individuals at the schools makes it difficult to support and communicate with the parents. Arguably, this creates a personnel issue or gap that affects a district’s ability to communicate with the migrant families. Joe, an assistant superintendent in Cherry, said,

That language support is a big one, too. We put more supports in place by having our secretaries that are bilingual at the local campus level. Prior to that it was a struggle to meet language needs. You know, that face-to-face communication. So slowly but surely we're putting positions in place that kind of fill that need. And interaction with the...you know, when the child gets sick. You have to be able to communicate that to parents.

Additionally, Jill, the Apples assistant superintendent, and Jane, the Bacon assistant superintendent, indicated how they have to provide translated documents to parents and interpreters, when needed, to discuss the student with parents. Sally, a Cherry ELL and migrant coordinator, explained that her district needs more translators (and interpreters) to be able to communicate better with migrant parents. Furthermore, the lack of bilingual individuals results in Sally and her personnel using Google translator as a way to bridge the language gaps.

However, Jill explained, "We cannot pay for translators out of ELL because those are things that are expected." Furthermore, Jill stated that,

You have to provide parents information in their own language. So that's something you have to do. Now, I can...There are sometimes, and we then probably, I may kind of go over the line, but like parent/teacher conferences, if I have to get someone other than who I have, sometimes I can pay for that...But I don't normally, because I like to be on the safe side. I don't want them coming in and auditing me and finding something that I shouldn't be doing.

Arguably, Jill sometimes interprets the policy a little differently, if the need arises, to apply federal resources in ways that may not always be appropriate, but are needed and necessary.

This provides an example of how Jill adapts the policy. Arguably, this is different from how Joe,

a Cherry assistant superintendent, Tom, Ben and Jen perceive their responsibilities in implementing the policy. Unlike Jill, Joe, Tom, Ben and Jen focus more on compliance and staying within the established boundaries of the policy in each of their implementations.

Districts' perceptions of programmatic success. Districts define success of their migrant education programs based on the results of the annual MAP test, the ACCESS test and any other assessments the districts have in place. The districts administrators' understanding of how to define success appears to be based on how DESE will evaluate their programs, as is illustrated in the CNA Report. The districts' understanding of how to determine success also appears to contradict what Tom, Ben, and Jen believe should be the benchmark to determine success. The intermediary implementers argued that migrant students should be evaluated with the ACCESS test and not the MAP, because the MAP does not account for students' lack of language proficiency. Despite the intermediaries' perspectives on the MAP, districts are using it to determine program and student achievements and successes.

The differing perspective between the districts and the intermediaries (MELL and the RPDC administrators) creates an interesting phenomenon, because districts believe the MAP is a good indicator of programmatic success and migrant student academic achievement. Sarah, an Eggs ELL coordinator, explained that "the most important thing that I need to do is to get the child at least working at grade level." As a result, programmatic success is a combination of the MAP and the ACCESS test. The Apples school district uses the MAP as a benchmark, but also considers attendance. Jill, an Apples assistant superintendent, said,

We do a program evaluation every year for our school district. And we really look at our MAP scores. Because if they can score proficient or above, we feel like they've got it.

And our big thing is we're trying to give them education. That is the . . . All those other things are what we're trying to take away any kind of barrier, so those other things are to get to the educational part. So we look at attendance, because attendance has a lot to do with how well they're probably going to perform. And we look at their MAP scores.

Those are the two things that we really look at, because we feel like they're hand in hand.

Joe and Sally, administrators in Cherry, expressed similar statements. They defined success based on a combination of assessments. Joe said,

We probably have a couple of levels of that. At the state level, they use ACCESS testing results to see how our kids are performing. Then at the building level we have a number of formative assessments that take place that we would analyze, and we would look at success, we would measure success on kind of those two, three fronts. And then you have that third category which would really just be classroom performance. How is the child's assimilating into the classroom, connecting to the classroom, producing in the classroom? So state assessments, local assessments, and then classroom teacher perspective. Once all three of those are kind of in the same alignment, that's when we kind of transition the kid out.

The participant's statements highlight how important language proficiency is for migrant students. If program success is determined by how well migrant students' perform on the MAP, and Tom emphasized that the MAP does not account for language proficiency, then there appears to be a disconnect. Yet, Missouri's policy as outlined in the CNA Report clearly outlines how the districts are supposed to be evaluating their programs. While Tom may disagree with

the use of the MAP, Apples, Cherry, and Eggs are implementing the policy as they are supposed to, and believe that it provides viable information.

In contradiction to Apples, Cherry and Eggs, and in agreement with Tom, Ben and Jen, Jane, a Bacon assistant superintendent, suggested that the MAP testing requirement does not show the kind of growth for these students as it is supposed to show, because of the language disparities. Jane said,

I do, however, feel like that we should have some leeway in our testing. In the state of Missouri they require that we give all our ELL kids the ACCESS test and then they take it again, and then that's supposed to show growth. And we're required to give that, and yet when it gets time for the MSIP 5 [the Missouri School Improvement Program, version 5], we are not allowed to use that [ACCESS] growth information. Well, I can tell you right now that until kids get their first language down, and get some literacy there, they're never going to be able to take a test like the end-of-course exam or the MAP test in their second language. So if they want us to show growth, they need to allow us to use instruments that are actually showing growth of what that student needs. That's probably my biggest concern, is that we're not... We're making great strides with these kids, but they're not where their peers that have been here their whole lives are, speaking English. So that is probably one of the biggest things that we need our state and federal government to understand. That we are making growth in the area that the student needs it, but they need the language basis first.

Similar to Tom, Ben and Jen, Jane would prefer to demonstrate growth and achievement using the ACCESS, rather than the MAP. Arguably, Jane would prefer to adapt her implementation

differently, but mandatory compliance and regulations from DESE, limit what she is allowed to report to DESE.

Additionally, Jill, an Apples assistant superintendent, explained that she is revamping their ELL program based on the last few years of MAP results because they believe they could be doing better. Jill said,

We graduate a lot kids from our ELL program. And they don't do badly on the Access test, but on the MAP test we do not meet in that area [communication arts]. And that's the area I really want to focus on, because that's the...that's where you want to reach. That's the goal. Because, like I said, it's not the test itself, it's the fact that it's telling you they get it. And so that's...We look at that and that's what we're trying to get toward. So that's why I'm tweaking it, because it's not...You know, if you keep doing the same thing you're going to get the same results.

Language fluency and proficiency has a direct impact on a student's MAP results.

According to several participants like Jill, Jane and Sarah, students with lower English language skills tend to have lower MAP scores and vice versa. Since Missouri and the districts use the MAP to determine program success and student growth, language acquisition is vital and necessary for many migrant students in Missouri. While the intermediary policy implementers and Jane, a Bacon administrator, may disagree with the viability of using MAP as an indicator of knowledge gained, it is apparent that several districts, including Apples, Cherry, Duck and Eggs, believe the MAP provides useful and necessary information to them that allows them to make improvements to their migrant education programs. Districts' migrant programs are designed

and implemented to address academic, educational disparities as required by the federal and state policies. However, districts also address the non-educational needs of migrants.

Districts' Perceptions on Meeting the Non-Educational Needs of Migrant Students

While the federal MEP does not address the non-education needs of migrant students, Missouri's policy via the CNA report does. As such, districts with the assistance of regional recruiters, their communities, and their own resources assist migrant students in addressing health related concerns that interfere with a child's ability to learn. Through the grant money provided under Title I.C, districts are able to provide migrant students with glasses, dental care and other health and social service needs. For many participants, getting a good education is not only about what happens in the classroom. Every district participant explained that providing for their migrant students and meeting their students' needs includes providing for social needs, like shoes, coats, dental services, vision services, and other health related services (Jill, Jane, Joe, Sally, Bill, Sarah, CNA report). Joe, a Cherry assistant superintendent explained,

...we've done glasses and we've done dental work. We've done a lot of social services. A lot of it gets handled at the building level. Other things like coats and shoes and stuff, that's going to happen at the building level too.

Sally, a Cherry ELL and migrant coordinator, echoed Joe's statements. Sally said,

We've also gone to...a lot of it is a recommendation or a referral to maybe a local physician, but bilingual. Part of that migrant recruiter, when she goes into the interviewing process, is there a lawyer in town that's bilingual who might be willing to work with a pay scale system for that type of individual that qualifies for a migrant. So it is just a simple phone call, can you refer me to? And we do provide services such as that,

but it would be a very simple conversation to open them up to those services, or where they would they go to get those type of services? It may be how do I pay my electric bill out? And then you can go to this particular service or two or Crosslines to get help with that type of service.

Jill, an Apples assistant superintendent, explained that their program also provides transportation for after-school tutoring. Additionally, all district participants explained that migrant students in Missouri are eligible for Free and Reduced Lunch because of their extreme poverty (Jill, Jane, Joe, Sally, Bill, Sarah). While districts may not be able to provide all the social services necessary to help the migrant student or the family, the districts are able to connect them to community networks that can. Joe, a Cherry assistant superintendent, explained.

So we have all of those structures in place, all of those... [Sally] is our point person for that. But I would say, I'd say that some of those services are being provided at the building without [Sally] knowing. Some of those services are being provided within the Hispanic community without any of us every knowing because they're taking care of each other.

Jill, an Apples assistant superintendent, echoed Joe and Sally's sentiments explaining how receptive and helpful her community is. Jill said,

This community is so good about... They provide things that, I've never been in a community, really, that is as supportive as this community is with everyone. We have a group that meets and collaborates on needs in the community. Housing, furniture, food. Even helping to pay maybe a utility bill. Shoes, coats. We have churches that provide

shoes and coats and we have Katy Trail that tries to get them Medicaid eligible for even a little bit so that they can get some things done.

Not all communities are this helpful and welcoming as was explained by several participants. Tom, Ben, and Jen explained how they encounter some communities that would rather not aid these students. Sarah, an Eggs ELL coordinator, suggested that in her community migrants are perceived to all be illegal and, therefore, not entitled to any services. Additionally, she expressed that she perceived the difference between her community in the southeastern part of the state and communities in the southwestern part of the state, to be due to the size, stability, and longevity of the Latino community. Sarah said,

I talked to some of those teachers down there [in the southwest region]. Yeah, but they've been working on this for years. The southeast area, really, it's new. It's really new. And it's...I don't know. It could be that the people who already live in that district are already supportive anyway, that they just see that... The migrant people are working.

They're not just sitting around. They're working, and that might be the conflict, too.

Arguably, the school districts have established relationships within their communities to provide and aid migrant families in obtaining social services.

Given the locally controlled nature of school districts, ties with their communities have existed since the days of the one-room schoolhouse. Since the state's MEP, via the CNA Report, calls for districts to aid with health-related issues, it is reasonable to assume that districts are using their relationships within their communities to provide the social services or to help families access the social services they need. When districts are able to, they provide things like glasses, shoes, and coats to their migrant students. When the migrant students' needs are

something the district cannot provide because of a lack of resources or that is simply beyond their scope and abilities, the district reaches out to the community for assistance.

The district administrators' interpretation and implementation of the MEP focuses on not only the educational needs of the migrant students, but also on their social needs, and the social needs of their families. This district-level interpretation is consistent with the state and regional interpretations. Jane, a Bacon assistant superintendent, summarizes this sentiment stating that "...anything that our migrant families or our migrant children need, we have several layers of support to make sure that we're meeting the needs of not only the student but the family as well." Through relationships and networks with community organizations, districts are able to meet the families' social needs. The importance districts place on this aspect is consistent with the sentiments, interpretations, and implementation strategies expressed by the intermediary implementers. Furthermore, this highlights the importance districts place on communicating and involving migrant families.

District's Perceptions of Parental Involvement

Parental involvement is one of the federal MEP defined outcomes. It is also one of the state's identified areas of needing improvement. Districts address this outcome in a variety of ways, employing a variety of strategies to engage and increase the involvement of their migrant parents. Some districts hold migrant parent meetings twice a year and some hold them four times a year. Some districts have Parent Advisory Committees (PACs). Some districts have liaisons to work with families. Some districts use the regional recruiters to engage the parents. Some districts employ surveys to gain feedback from parents. Regardless of the ways districts try to engage students, one response was consistent, it is difficult to get parents involved (Jill,

Jane, Joe, Sally, Bill, Sarah). Bill, a Duck migrant coordinator, explained, “We have meetings twice a year for migrant meetings and the parents, but a lot of times they don’t show up.” Jill, an Apples assistant superintendent, echoed Bill’s sentiment. Jill said,

We try to get parents to come in and be in on the plan, but it’s very hard because a lot of times both of them work and one works maybe in the morning, one works in the later afternoon, and they’re always home with the kids at the other time, and so it’s very hard. We’ve tried to have migrant meetings numerous times. Even, often feed them, that type of thing. So it’s really hard.

According to all of the district participants, getting parents to be involved in their children’s education is difficult for a variety of reasons; therefore, making this aspect of their MEP implementation difficult. One reason is the availability of parents to attend the functions. Bill, a migrant coordinator in Duck, explained how migrant parents that work the crops are in the fields from dawn to dusk. Jill, an Apples assistant superintendent, explained that processing plant migrants may work differing shifts, so that one parent is always home and available for the child(ren). All of the district participants explained that migrant parents are struggling in providing basic necessities like food and shelter for their families, they simply do not have they extra time to be involved in school activities (Jill, Jane, Joe, Sally, Bill, Sarah). Bill said, “I just don’t think they’re available to do it. I mean, I think they’re at the gin working, or whatever. They just don’t have the time right now. They’re trying to get food on the table.” Sarah, an ELL coordinator at Eggs, echoed Bill’s sentiments and explained that migrant parents want to be involved, they just cannot. Sarah said,

It's not that they don't want to be involved. I'd say can't be involved. The poverty level...the people that are called migrant, true migrant workers, it is way below the poverty level. And they're just wanting to be able to get food on the table, clothing on all of the family, be able to have decent shelter, because some of the places that they have to live in when they're coming in to do the crop and the watermelons or the potatoes, they're really pathetically bad. But they want to be able to be involved when we talk to them.

Regardless of their inability to be involved, all district participants indicated that migrant parents have a strong desire for their children to be educated. Jill, an Apples assistant superintendent, said,

I do know that some people think that the Hispanic population doesn't care that much about education. But that is totally not true. They want their kids to have every opportunity and to do well in school. And so I think it's more the language barrier for them than it is not wanting their kids to do well. Because I firmly believe that they want their kids to do well. And you know these migrant parents want their kids to do well.

Jane, an assistant superintendent in Bacon, echoed Jill's beliefs. Jane said,

Honestly, for the most part, and I don't want to put everybody in the same category, but for the most part these people really want their kids to have a good education. They really value the fact that it's not just something that's given to you, but that you need to work for it...But, they care about their kids and they want them to do well.

However, Joe and Sally, Cherry administrators, did note that they have seen an increase in the number of migrant parents involved over the last four years. Joe said,

If there is an event at school. Let's say the child performs in a choir performance, or there is that informational MAP, Smarter Balance, parent night that's informative, we've seen in the last four years a great increase in the number of our migrant and ELL attended.

Sally echoed Joe's statements, explaining that parents are getting more involved in the social activities. Sally said,

We've done the college night. A technology rotation informative night for parents and the increase in numbers is there. Even at just campus level, we're looking at district level, but campus level holiday parties, or our Halloween party, just to take an example that small, but the increased number of our Latino, ELL, migrant parents that are coming to assist with activities that day is growing.

Furthermore, Joe and Sally, Cherry administrators, expressed views that they perceived that some parents have a cultural belief that schools know best how to educate their children, therefore, parents believe they should acknowledge the school as the authority and not question that. For some parents, this authority carries a negative stigma, and potentially causes parents not to be as involved as districts would like. Sally said,

...parents, I think, see us [the school district] as a government agency. And I think that's a little bit intimidating. And so even though we have all these services that we can connect them and network them and help them acquire language, it's still hard to get them fully involved because I think there's a stigma about how they perceive us as a government entity.

District participants believed the perceived negative or positive view of the school appeared to be tied to community's culture and receptiveness to the migrant families. Some districts, like Apples, Bacon, Cherry, and Duck, are in communities that have the perception of being welcoming, supportive, and engaging to migrant families. Other districts, like Eggs, are in communities that have the perception of being less welcoming and not as supportive of migrant families. In Cherry, that has a welcoming and established Latino community, Joe and Sally are seeing migrant parents slowly becoming more involved. However, in Eggs, Sarah continues to struggle to engage her migrant parents.

One possibility for the differences in amount of parental involvement is due to the size and stability of the Latino community. Cherry is in a community that could be seen as a part of the new Latino diaspora. A second possibility is that Cherry's migrants are mostly processing plant migrant workers and might stay in the community longer. Whereas Eggs, is a crop community where the migrants are there long enough to plant or harvest. Arguably, both of these possibilities could be contributing to what is beginning to occur in Cherry with migrant families slowly becoming more involved in the schools.

While increasing parental involvement is one of the defined federal MEP outcomes, districts struggle to get their migrant parents involved. District participants acknowledged that the lack of parental involvement is not due to a lack of will, but is typically the result of parents needing to work to meet basic needs, like food and shelter. What becomes apparent is that, increasing parental involvement is part of the districts' interpretation and implementation of the MEP. Similar to statements made in the CNA Report and statements made by the regional implementers, districts struggle in increasing parental involvement. Additionally, many district

participants explained that migrant parents want to be involved and want their children to be educated, the parents simply lack the time to be involved in the ways parents are traditionally involved.

Summary of District (micro) Level Implementation

The micro level school districts are the street-level bureaucrats in this study because they are the final implementers of the Migrant Education Policy, meaning they work directly with the target population. Each district implements the policy differently to accommodate their migrant students' needs, taking into consideration their local context. While the districts do have flexibility in what their programs look like, they do have to demonstrate that their programs are working to meet the needs of their migrant students. Additionally, districts must demonstrate, through compliance regulations, that they are meeting the state's outcomes and, unknowingly, meeting the federal outcomes. While Tom argued that Missouri has no official policy, it is clear from the CNA Report that there is a policy. It is also clear that district participants believe they are interpreting and implementing Missouri's MEP.

Furthermore, it appears that there is a communication breakdown or misunderstandings between the districts and the intermediary implementers at MELL and the RPDCs. While the regional implementers suggested they inform districts of the federal laws and the services they should provide, district participants could not cite federal laws or court cases. However, districts are aware they are supposed to be doing certain things, as are outlined in their compliance checklists, like providing equal access, demonstrating academic growth, providing social services, and engaging parents.

While the federal MEP does not specifically address language instruction because that

falls under Title III, MELL, the RPDCs and the districts all explained the importance of language instruction for migrant students. Language instruction is considered essential for several reasons. First, it aids the students and the families in communicating with schools and community organizations, since many migrant students serve as interpreters for their families. Another reason for the emphasis on language instruction is because programmatic success is defined by how well migrant students perform on the MAP. While the intermediary implementers argued that the MAP was a poor indicator because it did not account for language disparities, the districts strongly believe the MAP can provide them with academic growth information.

In addition, district participants believed that providing social services to students and their families was an important component of their migrant education programs. Many district participants recognized the necessity to aid their migrant students and families in securing social services like glasses, dentists, medical providers, and lawyers, to name a few. In instances where districts were unable to provide directly the social service, districts used their local community connections to provide the needed social service.

Lastly, district participants expressed perceptions about the level of involvement of their migrant parents. Districts argued that parents' lack of involvement was due to financial necessity. Migrant parents want to be more involved, but simply cannot. However, one district noted that they have seen an increase in parental involvement over the last four years. In addition, district participants indicated their beliefs that the lack of parental involvement was not reflective of migrant parents' views about education. Participants argued that migrant parents highly value education and believe strongly in seeing their child succeed academically. The districts' perceptions about parental involvement are consistent with views expressed by the

intermediary implementers. While increasing parental involvement is one of the federal MEP outcomes, intermediary implementers and district implementers struggle to meet this outcome. This reflects the desire, or will, of the intermediary implementers and the district implementers to engage parents.

Overall, districts' implementation and interpretation of the MEP combines their local knowledge and their desires to improve the educational achievement of their migrant students. Districts expressed willingness to do whatever they needed to do for their migrants, regardless of having the resources or not. Additionally, districts interpreted and implemented the MEP, to the best of their abilities, even if they did not have complete knowledge of what it meant or how they would accomplish it.

Overall Conclusions

The federal Office of Migrant Education implements the migrant education policy through a multitude of grants and initiatives. Their implementation structure creates flexibility for states and districts. In Missouri, MELL, an intermediary organization, implements the state's migrant education policy by focusing its attention and resources on three main areas: identification, access, and academic achievement. While Missouri does address the other federal migrant policy outcomes, their primary focus is on the three mentioned areas. In their role as policy intermediaries, the state and the regions take into consideration the local context in which the federal (or state) policy is applied. Given the strong local control of Missouri's school districts, the intermediary role is necessary to ensure adequate and appropriate interpretations and implementations of the federal MEP and the state's MEP. The regional level's primary implementation focus for the migrant education policy is on challenges in identifying migrant

students, challenges associated with providing access to educational opportunities, and academic achievement. The combined and overall implementation focus of the street-level bureaucrats reflects a lack of understanding of the MEP defined outcomes, including communication breakdowns or miscommunications between the districts and the intermediary implementers, academic programming, meeting the non-educational needs of migrant students, and perceptions of parental involvement.

While each policy level interprets the policy and implements it based on their will and capacity, there appear to be clear connections across each level. Participants primarily discussed the programs in terms of ways to aid migrant students in achieving academic success. How that looks specifically varies by policy level. For the intermediary implementers, the implementation focus considers how migrant students are identified and the challenges that exist in identifying them. For the district implementers, the implementation focus is predominately on the academic programming necessary for migrant students to achieve academic success. Additionally, intermediary implementers appeared to be more concerned with the policy language, laws, and requirements that affect migrant students. RPDC administrators talked at length about discrepancies between federal law and state law. In contrast, district implementers talked at length about migrant parents and migrant families. Districts held strong beliefs that their role is as much about providing non-educational services to students and families, as it is about helping migrant students academically. Furthermore, districts appeared to be less concerned with the actual laws and regulations, and more concerned about taking care of their migrant students' needs.

Each policy level's implementers interpret and implement the MEP differently based on

their knowledge, their desires, and their role in the implementation process. Arguably, all the participants of this study believe they are doing what they need to do to meet the needs of the migrant students. While this chapter presented the findings of this study, the next chapter will discuss these findings in relation to the previous research literature.

CHAPTER 6 – DISCUSSION AND IMPLICATIONS

Introduction

In this chapter, I discuss the key findings of this study and their implications. The purpose of this study was to understand how the Migrant Education Policy was interpreted and implemented at four distinct policy levels: the federal (macro) level, the state (intermediary level), the regional (intermediary) level, and the school district (micro), street-level bureaucrat level. To achieve this purpose, the study asked four research questions:

1. How does the US Department of Education’s Office of Migrant Education interpret and implement the Migrant Education Policy?
2. How does the Missouri Department of Elementary and Secondary Education’s Office of Migrant Education, ELL, Immigrant & Refugee (MELL) interpret and implement the federal Migrant Education Policy?
3. How do the regions interpret and implement the federal Migrant Education Policy?
4. How are Missouri school districts interpreting and implementing the Migrant Education Policy?

The theoretical framework of this study focused on the implementation stage of the policy process. Over the last thirty years, numerous studies have confirmed and highlighted the complex nature of policy implementation (Honig, 2006a; McLaughlin, 1987; Lipsky, 2010; Owens, 2014; Werts & Brewer, 2015; Young & Lewis, 2015). McLaughlin (1987) argued that policy implementation studies must reflect multi-levels and multi-stages to accurately reflect the way a policy changes and is adapted by the various levels. Policy implementation studies have also considered the multiple policy actors, their beliefs and knowledge of the policy, their

intended outcomes, and the local context (Honig, 2006a; Owens, 2014). Using these theoretical underpinnings to understand the data, this theoretical foundation allowed this study to uncover differences and similarities in the interpretation and implementation of the Migrant Education Policy across four distinct policy levels: the federal (macro) level, the state level, the regional level, and the school district (micro) level. As such, this study uncovered five key findings:

1. Identifying migrant students is a challenge for the state and regional implementers, but vital to providing equitable access to all educational opportunities and services.
2. English language acquisition is an implementation priority for the state, regions, and the districts because students' scores on the Missouri Assessment Program (MAP) test, which does not account for language disparities, determine academic success in Missouri.
3. Social needs are an implementation priority for the state, regions, and districts because they are as important as migrant students' academic needs.
4. Districts struggle to engage migrant families and parents.
5. Communication problems exist between the state, regions, and districts that affect the MEP implementation process across the policy levels.

This study contributes to two growing bodies of literature: policy implementation and educating migrant students. Specifically, this study illuminates how the Migrant Education Policy is unidirectional and hierarchical in how it is adapted and implemented at four distinct levels, three of which are located within Missouri. While other studies have considered migrant students' needs and implementation of the MEP, no other study has examined them within the context of Missouri. Missouri is a unique location to study the intersection of Migrant Education

Policy and migrant students' needs because Missouri is a moderate state (Medoff, 1997) whose political ties are often split evenly between liberal and conservative, as is evidenced by the last fifteen years of election results (MO Election Results, n.d.). While regions of Missouri are part of the new Latino diaspora, other regions of Missouri are engrained in homogenous ways of thinking. Furthermore, many Missouri citizens consider migrant, immigrant, ELL, and Latino as synonymous. While this might be true sometimes, it is not always accurate. The lack of knowledge and understanding about who migrant students are, is reflected in how communities, and arguably school districts, respond to their needs and develop programs and policies that provide equitable opportunities to help this student population achieve academic success..

Summary and Discussion of Key Findings

This study shows the implementation of the Migrant Education Policy as unidirectional and hierarchical across four distinct policy levels. It also shows how the priority and focus of the state's interpretation and policy, drives the priority and focus of the regional implementation and the districts' implementation. The variation of the MEP at each level, as compared to other levels, depends how each level adapts, or does not adapt, the implementation priority and focus. The implications of these adaptations, or lack of adaptations in some cases, influenced how the programs were designed and what they provided to the target population (migrant students). These adaptations also highlighted how the different policy levels were meeting the intended policy outcomes.

The key findings of this study are:

1. Identifying migrant students is a challenge for the state and regional implementers, but vital to providing equitable access to all educational opportunities and services.

2. English language acquisition is an implementation priority for the state, regions, and the districts because students' scores on the Missouri Assessment Program (MAP) test, which does not account for language disparities, determine academic success in Missouri.
3. Social needs are an implementation priority for the state, regions, and districts because they are as important as migrant students' academic needs.
4. Districts struggle to engage migrant families and parents.
5. Communication problems exist between the state, regions, and districts that affect the MEP implementation process across the policy levels.

Identifying Migrant Students is a Challenge for the State and Regional Implementers, but Vital to Providing Equitable Access to All Educational Opportunities and Services.

According to the state and regional implementers, finding and identifying migrant students is a not only a challenge, but also vital in providing services to migrant students. As such, identifying migrant students is a key finding of this study. Migrants' frequent mobility creates challenges in finding and identifying them. District participants, Joe and Sally, Cherry administrators, and Jane, a Bacon administrator, believed that migrants' frequent mobility creates challenges to school districts that may only have the migrant student for a few weeks or a few months. The implications of this are that migrant students may not be identified, and determined to be 'eligible' for services before they move again, because the identification process can take a few weeks. Educational challenges associated with migrants' frequent mobility is well documented in the literature (Duron, 2004; Gouwens, 2001; Salinas & Reyes, 2004a; Salinas & Reyes, 2004b, Solis, 2004; Valenzuela et al., 2012. Additionally, Branz-Spall, Rosenthal, and

Wright (2003) argued that the MEP was designed to alleviate the disparities and educational gaps created by migrants' frequent mobility. However, migrants must be identified in order to receive their entitled services.

Arguably, identification and access to educational services and opportunities are almost interdependent and one of the most important findings of this study, as was explained by the intermediary implementers. The relationship between identification and access is necessary to understand because migrant students must first be identified before they can be provided access to services. This echoes Duron's (2004) and Hanley and Melecio's (2004) sentiments that identification and recruitment of migrant students is essential to providing timely and adequate services. Identifying migrants is a priority in Missouri; however, the identification process is an area of frustration and concern for the regional participants, Ben and Jen, and Tom, the state implementer. These participants shared similar beliefs that there are many unidentified migrant children in Missouri. Tom suggested this was because of the 2008 policy change in defining "temporary employment." Ben and Jen suggested the reason there are unidentified migrants was that recruiters lack the knowledge of how to find and identify migrants, and lack the knowledge of what questions to ask which contradicts Tom's statement about ensuring that recruiters receive proper training. Additionally, Ben and Jen suggested that part of the challenge could be due to a lack of leadership and a lack of enforcement from the state. Regardless of these possible reasons for unidentified migrants, it was evident from these participants, that they had a possible solution. They suggested similar changes to the identification process. Rather than relying solely on school districts and recruiters to identify migrant students, Tom, Ben and Jen suggested that a better alternative would be to use the students' history of moves and established patterns.

Regardless of how the identification process is designed, Hanley and Melecio (2004) argue that successful identification and recruitment requires trained staff (i.e. recruiters), effective supervision, good record keeping and frequent audits and checks. Duron (2004) further argues that communication between actors at different levels is crucial to good identification and recruitment. Arguably, Missouri's identification process is lacking in some of the key areas identified to make identification of migrant students successful.

However, the suggested alternative is not considered a viable option by either the state or the regional implementers to identify migrant students because the Director of MELL believes the alternative is not allowed under the federal MEP guidelines, as was described by Tom. Additionally, Tom suggested that the Director of MELL also believed that identifying migrants based on the suggested alternative of historical movements would be unethical. This places the intermediary implementers at the state and regional level in a frustrating situation, because they perceive they cannot ethically adapt the policy in a different way. This contradicts the literature about the role of intermediary organizations (and individuals). Intermediaries serve a unique position in the policy implementation process by mediating between the policy enactors and the local, street-level bureaucrats (Honig, 2006a; McLaughlin, 2006; Owens, 2014, Smylie & Evans, 2006). Additionally the research argues that intermediaries are able to adapt policies and affect change, given their local knowledge and cultural context (Honig, 2004). While it may superficially appear that the intermediary implementers mediate the federal policy by following the guidelines verbatim, their interpretation creates challenges and frustrations that result in unidentified migrant students in Missouri. Arguably, it appears that the intermediaries (MELL and the RPDCs), either do not have the ability or they do not have the will, to adapt the policy

and affect change that would be necessary to improve the implementation process, thereby providing migrant students equitable access to educational opportunities.

Identifying migrants is also important because the funding formula used by the federal Office of Migrant Education (OME) to award states funding for the migrant education programs is based on the number of identified migrant students (OME, "Programs," 2012). Once the state receives the funding, sub-grants are provided to districts with identified migrant students, according to Tom. Tom, Ben, and Jen suggested that districts may not want to notify the state about potential migrant students because of the abundant restrictions tied to the funding. Specifically, the participants explained what the funding can and cannot pay for. This relates to statements expressed by Ben and Jen about possible reasons districts do not want to identify migrant students. This relates directly to Hanley and Melecio's (2004) findings about good identification and recruitment strategies. If audits, checks, and proper supervision are problematic, as was suggested by Ben and Jen, then Missouri's identification strategies need some altering. It also relates to Duron's (2004) findings that successful identification requires good communication between policy levels. Since communication problems between the policy levels are apparent in this study, it would suggest that identification of migrant students is just one area impacted. Furthermore, Tom indicated that about half of Missouri's migrant students are not being identified which suggests that Missouri is only receiving about half of the funding it should be receiving. Arguably, if Missouri was identifying all the migrant students in the state, the additional funding received could provide these students with additional resources that would improve their academic achievement.

Identifying migrants can also be challenging for school districts, since districts rarely know in advance if, when and/or how many migrant students are coming. The result is that some districts are not always prepared and must quickly respond, according to RPDC administrators, Ben and Jen. This suggests that districts do not always have a migrant plan in place, as they are required to. Arguably, migrants in these districts are probably not receiving the services they should be, because these districts have to develop a plan and create a program for a transient population that may move on before the district figures out what they are going to do and properly identify the student. Quickly identifying migrant students gets them access to their entitled services, thus meeting one of the MEP's goals. However, the certificate of eligibility can take two to three weeks to receive from the state and within that time, the migrants could be moving on. In some cases, districts begin assessing students' needs and providing services prior to receiving the certificate of eligibility from the state as was indicated by Jane, an administrator in Bacon. As Jane explained, this lag in the identification process creates frustrations for her and her district.

Once the migrant student is identified, and certified as eligible for services by the state, districts must quickly assess the student's content, language, and health needs. Arguably, districts must provide what is necessary to meet the needs of their migrant students regardless of whether they have the capacity (resources or personnel). When necessary, district participants (Jane, Joe, Sally, Sarah) will reach out to their regional representatives for assistance in providing services. However, Ben and Jen argued that they perceived a loophole that districts may use to deny services is in failing to identify the migrant student and thus deny him/her the educational opportunities he/she is entitled to. This contradicts the districts participants' beliefs

that they will do what is necessary to provide for their migrant students. Joe, Sally, Sarah, Jane, Bill, and Jill emphasized that every child, including migrant children, are entitled to an education, sometimes acting without necessary personnel or resources to ensure migrant students are provided equitable access.

In relating this important finding (identification), to the literature, it appears that this finding addresses a gap in the migrant, and, potentially, the implementation literature. Presently, there is limited literature on identifying migrants, identification strategies and processes, or the importance of identifying migrants in being able to provide them access to services. Primarily, Hanley and Melecio (2004) and Duron (2004) provide evidence of effective and successful identification and recruitment strategies. However, access to education is well documented in federal law, court cases, and the literature. While the federal MEP outcomes specifically require providing access to educational opportunities, identification is implied in the policy and one of the OME's programmatic initiatives, the Identification and Recruitment Initiative. Furthermore, federal laws like the MEP and the Equal Educational Opportunities Act of 1974, and court cases like *Castaneda v. Pickard* (1981), *Plyler v. Doe* (1982), and *Flores v. Arizona* (2000), require districts to provide adequate and equitable educational opportunities without discrimination to migrant students. Providing equitable access to educational opportunities is required, but not an easy task to implement. Although the intermediary implementers have the knowledge of the identification process, and what would be a better alternative, they lack the will or ability to change it.

English Language Acquisition is an Implementation Priority for the State, Regions, and the Districts Because Students' Scores on the Missouri Assessment Program

(MAP) Test, Which Does Not Account for Language Disparities, Determines Academic Success in Missouri.

While English language acquisition is not a defined outcome of the federal Migrant Education Policy, it is implied in Missouri's policy through their outcomes and goals based on academic achievement in mathematics and language arts. This focus on language at the state level highlights how Missouri adapted the MEP to meet the needs of Missouri's migrant students. English language learning instruction falls under Title III; however, Title III (ELL) and Title I.C (Migrant) fall under the same office in Missouri (MELL). According to all the participants, most of Missouri's migrants are also English Language Learners (ELLs). As such, language acquisition is a priority for the state, the regions, and the district, as was indicated by all participants. This is consistent with the literature that argues language acquisition is needed for migrant students (Duran, 2003; Golden et al., 2014; Gouwens, 2001) because academic success is based on English literacy and fluency (Alanis, 2004; Garcia & Kleifgen, 2010; Hornberger, 2005; NCTE, 2008). The evidence in this study showed that the contradiction around language acquisition lies in how academic success is determined in Missouri.

According to all the participants, students' scores on the Missouri Assessment Program (MAP) test determine academic success in Missouri. Districts also use MAP results to inform districts and the state about success and places for improvement in the various migrant education programs. District participants, Jill, an Apples administrator, Sarah, an Eggs administrator, and Joe and Sally, the Cherry administrators, believed the MAP provided them useful and accurate information about how well their migrant students were academically achieving and growing, intermediary implementers. Tom, a MELL administrator, and Ben and Jen, RPDC

administrators, and Jane, a Bacon administrator, argued that the MAP was not a fair or accurate reflection of knowledge because it did not account for language differences or English language proficiency. Furthermore, Tom, Ben, Jen, and Jane suggested that a better measure of knowledge would be the use of the WIDA-ACCESS test that measures language proficiency separately from subject matter knowledge. Regardless of how the participants viewed the use of the MAP, migrant students are still judged by how well they perform on it. While some district participants believed using the MAP was positive and provided their districts with good information, the state, regional, and one district implementer, believed the MAP provided inaccurate information. Furthermore, the state, regional, and Bacon administrator believed a better alternative would be the use of the WIDE-ACCESS test. However, these participants believed they were unable to implement the policy any differently because of DESE constraints and compliance regulations.

As would be expected, migrant students are not performing well on the MAP, as was indicated by all the participants. Poor performance on the MAP suggests that districts are not meeting Missouri's policy outcomes for mathematics and communication arts because migrant students lack the language proficiency to perform well on the assessment. Although, Tom, Ben, Jen and Jane expressed their frustrations and would prefer a different testing measure, like the ACCESS, for migrant students they are unable to exempt migrants from the MAP because the Missouri Department of Elementary and Secondary Education (DESE) requires ALL students to take the MAP, regardless of language disparities. Although all participants explained how they were following DESE's requirements and implementing the policy as required, they did not believe they could do anything differently. This suggests an inability or lack of will to adapt the

policy differently. Despite DESE's mandate, research suggests that migrant (and ELL) students must acquire literacy and fluency in English to be "academically successful" in school (Alanis, 2004; Garcia & Kleifgen, 2010; Hornberger, 2005; NCTE, 2008). This implies that migrant students probably will not perform well on the MAP until they are proficient or fluent in English. One potential consequence of this is that migrant students who already have a negative connotation of school could view their low performance on the MAP as another negative attribute of staying in school. A second potential consequence is that districts could be judged as doing poorly in educating their migrant students.

However, since Missouri was recently granted the waiver by the federal government because many subgroups of students were not meeting AYP, Missouri has now created a super-subgroup. According to Ben, the super-subgroup combines all the individual subgroups into one group. The result is that districts and Missouri are able to demonstrate AYP of this one group rather than AYP in multiple groups. This student classification change could make it more difficult for districts to obtain information about how their migrant students are performing on the MAP. This change could also impact whether or not districts continue to focus energy on improving their migrant and ELL students' MAP scores since they will now be judged by their super-subgroups' performance and improvement.

In addition to the MAP, all ELL students, including migrant students, are required to take the ACCESS test to evaluate their English language skills and language growth. Several district participants in Apples, Bacon and Eggs, explained that many students are not transitioned out until of their ELL program until they are ready or their ACCESS test scores indicate they have proficiency. Furthermore, Jane, an administrator in Bacon, and Sarah, an administrator in Eggs,

argues that students that are transitioned out of ELL programs are transitioned back into them if the district feels it is necessary for the student. Although ELL funding requirements limit funding for a student for no more than three years, research suggests that that ELL students need special language instruction through high school to help them develop “academic” English and to learn the discipline-specific content that begins to appear in classes like Chemistry and Economics (Garcia & Kleifgen, 2010; Hornberger, 2005; NCTE, 2008). On average, it takes five to seven years for a person to achieve fluency in a language and longer if it is a second language (Valenzuela et al., 2012).

Arguably, the literature on English language proficiency and this study’s findings, as suggested by Tom, Ben, Jen, and Jane, who believe that migrant students should not be taking the MAP until they have obtained proficiency in English, contradicts DESE’s mandate. However, these individuals believe they are unable, or perhaps choose not, to adapt and implement the policy any differently because of the compliance regulations DESE has placed on them. This appears to contradict the literature about intermediary organizations, as previously mentioned, because the regional intermediaries are not adapting the policy to use what they believe is a better alternative to evaluate migrant student achievement. The literature argues that intermediary organizations (and individuals) are able to adapt policies and affect change, given their local knowledge and cultural context (Honig, 2004; Owens, 2014). However, it appears that the intermediaries (MELL and the RPDCs), either do not have the ability or they do not have the will or they do not have the capacity, to adapt the policy and affect change that would be necessary to improve the implementation process.

Additionally, all participants in this study argued that language acquisition is not only important for the student, but also for the families. Every participant explained how migrant students often interpret and serve as language brokers for their families when interacting with doctors, community organizations, and other service providers. Ben and Jen, regional participants, suggested that the students' role goes beyond just interpreter. Ben and Jen are seeing a role reversal between the student and parents, where the students are paying the bills and finding housing because the parents cannot communicate with these organizations. This is consistent with the literature that suggests many migrant students serve as language brokers for their families in situations outside of the home with schools, government organizations, healthcare providers and service providers, just to name a few (Dorner, Orellana & Li-Grining, 2007; Morales, Yakushko & Castro, 2012). To help students and their families, district participants try to have bilingual individuals in their schools, when resources allow. Regional participants explained how they would serve as interpreters for the family or refer them to community organizations that have bilingual individuals that can aid them in acquiring services. The implication of providing or serving as interpreters for families removes the burden of interpreting from the children. Arguably, it allows the parents some independence in being able to communicate with the outside world, especially when the topic is one the child should not be privileged to.

Additionally, it is apparent that migrant students need English language acquisition to develop "academic English." Since Missouri's MAP does not account for language disparities, migrants' lack of academic English hinders their ability to perform well on the MAP. The inability for the participants to meet the DESE requirements in a different way, limits how they

are able to implement the policy. While most districts are satisfied in using the MAP to determine success of their programs, Bacon, Tom, Ben, and Jen believe the MAP is not a fair assessment. Arguably, not adequately and properly measuring student growth can hinder the educational opportunities for migrant students in the future.

***Social Needs are an Implementation Priority for the State, Regions, and Districts
Because They are as important as Migrant Students' Academic Needs***

While the federal MEP does not address the non-education needs of migrant students, Missouri's policy via the CNA report does. As such, districts, with the assistance of regional recruiters, their communities, and their own resources assist migrant students in addressing health related concerns that interfere with a child's ability to learn. Every district participant explained that providing for their migrant students and meeting their students' needs includes providing for social needs, like shoes, coats, dental services, vision services, and other health related services (Jill, Jane, Joe, Sally, Bill, Sarah, CNA report). This is consistent with the literature that migrants face daily and pressing challenges in meeting basic and fundamental needs like food, shelter and health (Ashiabi, 2005; Green, 2003; Keogh et al., 2006; Valenzuela et al., 2012). Either when districts are unable to provide these services because they lack the resources or because it is beyond their scope, they work with their regional associates and their communities to provide or refer families to services that can assist. Since health and social services is a Missouri MEP outcome, districts do their best to assist migrant students and their families in securing social services, regardless of whether they have the capacity to do so. When districts do not have the capacity, they reach out to their regional representatives and their communities to aid migrant families and students.

Community involvement and assistance in aiding migrant families appears to be related to the size and stability of the Latino community. According to Sarah, the Eggs district is in a community that has a perception that migrants are undocumented immigrants and therefore not entitled to services. As a result, the community provides little additional assistance to migrant families when needed. However, Cherry administrators, Joe and Sally, and Jill, an Apples administrator, described how their communities were welcoming and able to aid migrant families in accessing such services. Joe and Sally also explained that sometimes their community provides for the migrant family without the school even knowing. Joe and Sally suggested that the reason for this was related to the established Latino community in their area. Districts involvement in providing social services indicates Missouri's adaptation of the MEP to include social services as one of their policy outcomes. As such, school districts use their local context and local knowledge to assist migrant families and, therefore, meet this policy outcome. This is consistent with the literature on the role of the street-level bureaucrats (Birkland, 2011; Honig, 2006a; Honig, 2006b; Lipsky, 1979, 1980, 2010; McLaughlin, 1987; Shulman, 1983; Weatherly & Lipsky, 1977). Additionally, their apparent commitment to providing for the families suggests that these street-level bureaucrats have the will. When they lack the capacity, districts will use their community networks to meet the social needs of their migrant students and families (Birkland, 2011; Fowler, 2013; Honig, 2006a; Honig, 2006b; McLaughlin, 1987). Arguably, this study presents evidence of how districts use their community networks to provide for and assist their migrant students and families.

The differing community perspective, like those between Eggs, Apples, and Cherry, regarding beliefs about migrant families receiving social and education services, highlights a

growing phenomenon occurring throughout the country. Apples and Cherry have large, established Latino communities because of the processing plants in their community. Arguably, the changes in communities like Apples and Cherry over the last twenty years, suggests they are part of the new Latino diaspora in Missouri, similar to what is occurring in other small, rural communities in the Midwest (Artz, Jackson & Orazem, 2010; Burnett & Luebbering, 2007; Dozi & Valdivia, 2005; 2003; Lazos & Jeanetta, 2002). Missouri is one of the states being redefined as part of the new Latino diaspora as migrant workers are moving to communities where meatpacking plants are located, like Apples and Cherry (Clotfleter et al., 2011; Flores et al., 2011; Gouveia & Saenz, 2000). According to the Missouri Economic Research and Information center (2012), changes in the population census since 1990 show that more than thirty Missouri counties doubled the size of their Latino population within the last decade and several counties experienced a growth of greater than 500%. Arguably, these sizable and established communities aid school districts in providing for and meeting the social needs of migrant families. The implication is that districts, like Apples and Cherry, located in these established Latino communities have more support and larger networks that can aid migrant families and students in finding and securing health and social needs. However, districts, like Eggs, located in communities without an established Latino community struggle to meet the social needs of the migrant families and students. Additionally, the community perception that all migrants are undocumented has negative connotations that schools could work to counteract by hosting events that spotlight migrants in their area and educate the community about the value they bring.

Districts Struggle to Engage Migrant Families and Parents.

Difficulty in engaging parents is another important finding of this study and it directly corresponds to one of the federal MEP's stated outcomes (improving parental involvement). It also corresponds to one of Missouri's defined MEP outcomes. All district participants indicated they struggled to get migrant parents involved in the school or engaged in their child's education. The district participants provided multiple reasons for parents' lack of involvement, including work obligations or work conflicts because the parents are economically struggling to provide basic necessities. Furthermore, Sarah, an administrator in Eggs, argued that some parents have a cultural belief that schools know best how to educate their children, therefore, parents, in her district, typically acknowledge the school as the authority and not question that. However, Cherry participants, Joe and Sally, explained how they are slowly seeing an increase in migrant parent involvement. As previously mentioned, Cherry is located in an area with an established Latino community. Perhaps the relationship between the Latino community and the school district gives migrant families confidence and helps to build trust between the family and the school. Regardless, district participants believe that migrant parents have a strong desire for their children to be educated. As such, engaging parents is a challenge for all the districts and a recognized difficulty in meeting that policy goal. In trying to meet this policy outcome, the districts employ a variety of strategies, like annual parent meetings, parent advisory councils and regular social events, districts still struggle to engage migrant parents. With the exception of Cherry, districts are still struggling to find effective ways to engage their migrant parents.

While increasing parent involvement is a federal and Missouri MEP defined outcome, districts struggle to find better ways to engage and involve their migrant parents. However, regional recruiters are able to establish relationships with the migrant families during the identification

process. Since the regional implementers are able to build a trusting and working relationship with the migrant family, perhaps involving these individuals more at the district level events for migrant parents would increase the migrant parents' trust and engagement in the school district. Additionally, this outcome falls more directly on the school districts than the other policy levels. The state rarely interacts with migrant parents as was expressed by Tom. This suggests that not only does MELL perceive involving migrant families to be a district concern, but also that MELL does not put a high priority on this particular outcome.

The struggle to engage migrant parents is consistent with the literature. Lee and Bowen (2006) argue that parents from different backgrounds may see parental involvement differently because they have different predispositions and beliefs about involvement. Based on their own beliefs and experiences, parents from non-dominant groups, with low levels of education, and/or lower social class may be less involved at school and more involved at home. This is could be due, in part, to the parents' lack of understanding about the school, language barriers, their own negative experiences, and work (Lee & Bowen, 2006). Lopez, Scribner, and Mahitivanichcha (2001) found that migrant parental involvement in their children's education must be constructed differently because migrant parental involvement goes beyond the traditional at-school activities. Their study found that schools were highly successful at involving migrant parents when the schools focused energy on meeting migrant needs, engaging migrant families, and offering support to the families. Arguably, the district participants in this study are trying some of the different strategies to engage parents that are described in the literature. In addition, there appears to be one district that is slowly finding success in engaging their migrant parents.

Perhaps their success is a result of the relationship between the school and the established Latino community.

Communication problems exist between the state, regions, and districts that affect the MEP implementation process across the policy levels.

The fifth key finding of this study is an apparent communication breakdown that exists between the state, regions, and districts. While communication is not a federal or state MEP outcome, good communication is necessary for successful policy implementation (Fowler, 2013). The discrepancies between levels about what each policy level is doing and is not doing suggests there is a communication problem. Tom explained how he and MELL work to ensure recruiters receive proper training to ask the right questions that are necessary to identify migrant students. However, Ben and Jen argued that recruiters are not properly identifying migrant students and are not asking the right questions. Additionally, Tom explained that he and MELL spend much time monitoring the recruiters. Yet, Ben and Jen argued the opposite. These two examples highlight a communication problem that exists between the state (MELL) and the regional implementers.

Furthermore, Tom, Ben, and Jen argued how they work to educate districts about the federal laws and requirements that require districts to provide educational opportunities and services, because districts are unaware of the laws and requirements, and are sometimes hesitant to do what is required. While no district participants could cite federal laws or policies, they did stress the importance of providing access to their migrant students and doing whatever was necessary to provide for their needs, regardless of available resources. This is another example of the communication breakdown that exists between the state, the regions, and the districts. If

the state and the regions are training districts and providing districts with information about the laws and their requirements, then why are districts unaware? Perhaps Tom, Ben, and Jen are not providing adequate information to the districts or perhaps districts are not focusing on the particular details. Regardless, districts are providing services to their migrant students despite what Tom, Ben, and Jen believe.

Jane, a Bacon administrator, noted the need for more communication from the state and the regional implementers. Jane explained how she would like more information and better communication from the state because migrant students' situations vary greatly. Several district participants described having a good relationship with the state and their recruiters, but no district participant mentioned having a relationship with the instructional specialists. However, the instructional specialists described how they interact regularly with their districts. This contradiction suggests that, perhaps, the districts may not recognize the role and value of the instructional specialists can provide in assisting them with their MEP implementation. A second possibility is that the instructional specialists might be interacting with districts regarding different student populations. A third possibility is that instructional specialists are not interacting with districts as regularly as was suggested. Regardless of the possible reasons for the contradiction between the instructional specialists and the districts regarding their relationship, a problem exists that affects the migrant students. This would align with statements made by Ben and Jen about how districts do not contact them for training and professional development about migrant and ELL related practices, strategies, and policies. In addition, the sentiments expressed by Jane, Ben, and Jen are consistent with MELL's most recent evaluation report conducted by OSEDA that described how some districts do not have good relationships

with their RPDC offices. As a result, some districts do not contact their RPDC offices for training and professional development. It would seem that Jane, Ben, Jen, and OSEDA's findings are consistent with communication problems between the state, RPDCs, and the districts. Furthermore, these communication problems create implementation challenges for each of the levels and between the levels.

Communication problems between MELL and the RPDCs, the RPDCs and the districts, and MELL and the districts create implementation challenges that directly affect the migrant students. Poor communication or communication breakdowns between the policy levels directly affect the ability of implementers to implement the MEP based on the expected interpretation. How can the districts know what is expected if the information is not communicated to them? Simply, they cannot. Intermediary implementers need to work with the districts to reduce the communication problems. Honig (2004) and Owens (2014) argue that one of the roles of intermediary implementers is to bridge knowledge gaps by sharing information that aids local implementers in translating a policy into exact plans and steps. As is evidenced in this study, the intermediary implementers at MELL and the RPDCs are not necessarily bridging knowledge gaps for the local district implementers. The intermediary implementers provided several examples of providing information and sharing knowledge with districts, yet district participants could not reciprocate the knowledge. However, districts provided multiple examples of implementing the MEP in ways that contradicted beliefs held by the intermediary implementers. These contradictions suggest that there are communication problems between MELL, the RPDCs, and the districts.

The findings of this study would probably look very different if the study had been conducted in a different setting. The experiences, knowledge, and beliefs about the federal and state MEP outcomes could look quite different if the research was conducted in a state with a larger migrant population, a state with a different organizational structure, or a state with more legislative support. For example, a study conducted in a state like California or Texas that have long histories of working with migrant children, have established legislation to protect migrant farmworkers, and have established bilingual education programs. A study in this setting would be likely to produce findings that highlight parents and families that are more involved, less identification problems, and better language acquisition strategies and implementations.

Implications and Recommendations

The findings from this research have implications for policy implementation at the state, regional and district level. From this study, I offer four recommendations that might improve the implementation of the migrant education policy in Missouri, and therefore the academic achievement of migrant students in Missouri.

- 1. The identification and certification of eligibility needs to become a quicker and more streamlined process.*

While the current identification and certification process is working in Missouri, it can take a couple of weeks for districts to be provided with the certificates of eligibility for migrant students. For some migrant students, two weeks of missed educational opportunities is substantial. Arguably, a better process that involved examining their movement patterns and relied less on districts, would better find and identify migrants the currently unidentified migrants.

2. *State, regional, and local policymakers should provide more professional development opportunities to ALL Missouri school districts to educate ALL their staff on federal laws and policies and educational best practices pertaining to migrant students.*

School districts and staff involved with migrant students are somewhat aware of migrant policies and educational best practices. However, districts in the state that do not receive migrant funding are unaware of the laws, policies, and best practices. Arguably, Missouri's school districts need more training and more professional development to increase their knowledge of migrant students, laws pertaining to migrant students and educational best practices to improve the language skills and content knowledge of migrant students. Since a migrant student may appear in any Missouri school district, all districts, and all staff should be aware and familiar with migrant federal laws, policies, and educational best practices. This information would ensure proper identification, access to educational opportunities and promotion of academic achievement. Additionally, this information could be used to establish better communication between the regions and districts in Missouri to help create successful programs in new settings based on what has been learned by the established settings.

3. *Federal, state, regional, and local policymakers should reconsider the ways and techniques used to engage migrant parents.*

Since many migrant parents lack the available time because of work obligations and conflicts to participate in school events, states and districts should re-think their current strategies. While research demonstrates the importance of engaged and involved parents in a child's success, much of the research is based on mainstream, homogenous thinking. Even though increasing parental involvement is a defined federal outcome, it may not be as vital of a priority at this point in time.

Should policymakers choose to continue their focus on engaging migrant parents, there needs to be a shift in thinking and expectations of what parental involvement means and looks like. A better benchmark and plan for increasing migrant parents' involvement would involve the migrant parents' understandings of parental involvement. Additionally, holding meetings at times that are convenient and do not interfere with parents' work obligations is a possible solution. A second possible solution would be to involve trusted Latino community members in the parent meetings to demonstrate commitment from the district and the community to help migrant families and students. This would help to build trust between the migrant families and the schools. Additionally, districts need to ensure that interpreters are readily available to bridge language barriers between the families and the schools.

4. Federal, state, regional, and local policymakers need to establish better communication strategies with each other.

Since communication appeared to be an issue between the different policy levels, there is a need to create and establish a better communication strategy. At each policy level, there are things working well and things not working at all. For the areas not working well, like finding and identifying migrant students, poor communication between the policy levels is at the heart of the issues. Better communication strategies could alleviate some of these problems. Ideally, monthly meetings, whether in-person or as conference calls or web-based, that required all personnel involved with migrant students, would improve the communication and misunderstandings that exist. Better communication between policy levels would increase the will and capacity of the MEP implementers. It would also improve the overall implementation of the MEP by building trust and creating teamwork between the policy levels. Additionally,

better communication would allow a more readily available networking system that implementers could rely on to make adjustments and improvements based on what has worked, and what has not worked in other districts.

Study participants articulated problems with the identification of migrant students, need for more training, the lack of migrant parents' involvement, and better, more effective communication. These recommendations lead to areas of possible future research.

Areas of Future Research

This study focused on the implementation of the migrant education policy at four distinct levels. This study questioned how each of the levels interpreted and implemented the migrant education policy. It also asked how each policy level's implementation was able to meet the migrant students' needs and meet the federal and state defined policy outcomes. From this study, there are more critical questions to ask.

The first key area of study that educational researchers could examine is trends in Missouri's implementation and Missouri's school districts implementation of the migrant education policy. This research could consider how the policy implementations have changed over time and how those changes were influenced by the policy changes at the federal (macro) level. Specifically, a study like this would involve researching historical federal and state policies and interviewing personnel, if any could be found, to discuss the changes. Additionally, it might prove useful and beneficial to investigate changes in Missouri's political climate and DESE's structure as part of the historical understanding. While this study begins to examine this line of research, understanding the changes over time would highlight how the policy has shifted and been adapted over time, thus highlight different implementation strategies. The challenges

for a historical or longitudinal study would be finding individuals that can accurately recall the events of a particular time. Additionally, it may be difficult to access older policy documents that are not readily available on the internet. Furthermore, involving districts who used to have migrant students and regional perspectives from different participants could highlight different implementation strategies. Given the policy shift toward greater school accountability, these trends could provide data on positive and negative implementation strategies in Missouri. This research should also consider changes in Missouri's political climate to understand the priority the Migrant Education Policy has in Missouri.

A second key area of study would be to examine the migrant parents' perspectives and understandings on their involvement in their child(ren)'s education. Since much of the current research is based on mainstream, homogenous perspectives on parental involvement, understanding migrant parents' perspectives would enable policymakers and school districts to better implement involvement strategies. The literature suggests that some migrant parents have negative views of schooling; therefore involving migrant parents' perspectives might contradict the literature and develop a more rich understanding of their perspectives and their needs. Additionally, involving community members from areas in Missouri that are part of the new Latino diaspora that have lengthier histories of immigration and established community organizations could help districts build trust with migrant parents and established more and better avenues to accommodate their needs. These new perspectives could add to the overall body of literature on parental involvement by presenting a non-mainstream perspective.

A third key area of study would be to compare Missouri's migrant education policies with another state of similar political climate. A comparative study based on similar political

climates could highlight different implementation strategies that might also work well in Missouri, given that more is a mostly moderate state that lacks official legislation on immigration and migrant farmworkers. According to Medoff (1997), states with similar political ideologies are Illinois, Ohio, Kentucky, North Carolina, Indiana, Pennsylvania, Colorado, Idaho and Tennessee. Given the readily available research on Ohio and North Carolina migrant programs, either would be a good match for a comparative study. However, any of the states would provide interesting results that could aid policymakers in developing and/or adapting different strategies that may work better for improving the academic achievement of Missouri's migrant students.

Conclusion

The findings from this study show that policy implementation varies by policy level. It also highlights how communication can breakdown or be misunderstood between policy levels that can create challenges in finding and identifying migrant students. Furthermore, this study uncovered differing perceptions about what districts do and do not do for migrant students, which arguably results from the communication breakdown or misunderstandings. Additionally, differing perspectives regarding the use of the MEP to measure migrant student success, between the policy implementers and the federal and state compliance regulations appear to limit what and how state, regional and district implementers are able to adapt the MEP to meet migrant students' needs. While this study shows the implementation of the migrant education policy in Missouri as unidirectional and hierarchical based on the federal and state MEP defined outcomes, it also shows how there are some implementation variations at each policy implementation level. The variation at each level as compared to other levels lies in how each

level carries out the implementation priority and focus. Educators in this study acknowledged the value and importance of migrant students' access to education opportunities. The participants also acknowledge ways in which they can promote and aid in the academic achievement of migrant students. This study also uncovered areas of improvement in the implementation of the migrant education policy. Specifically, participants noted problems associated with identification, access and the way migrant students are tested. Successful migrant education programs should not be based solely on test scores that do not account for language barriers; rather success should consider multiple sources that recognize the growth and development of the migrant student as a whole person.

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Appendix A: Tables 2 through 5, National and State Numbers of Migrant Students

Table 3

National Number of Migrant Students by Grade Level

Academic Year	Ages 3-5	Grades K-3	Grades 4-5	Grades 6-8	Grades 9-12	Out of School	Total
2007-2008	49,432	113,841	55,910	80,890	103,184	81,782	485,039
2008-2009	48,730	112,174	52,518	75,815	97,445	74,945	461,627
2009-2010	46,318	105,718	49,572	70,106	89,287	67,316	429,540
2010-2011	43,023	101,346	47,685	66,541	83,833	58,111	401,362
2011-2012	42,195	98,167	45,082	62,743	79,419	49,195	376,801

Note. Adapted from “Consolidated State Performance Report, 2007-2008, 2008-2009, 2009-2010, 2010-2011, 2011-2012” by Ed Facts, 2013.

Table 4

Percentage of National Migrant Students by Grade Level

Academic Year	Ages 3-5	Grades K-3	Grades 4-5	Grades 6-8	Grades 9-12	Out of School	Total
2007-2008	10.19%	23.47%	11.53%	16.68%	21.27%	16.86%	100.00%
2008-2009	10.56%	24.30%	11.38%	16.42%	21.11%	16.23%	100.00%
2009-2010	10.78%	24.61%	11.54%	16.32%	20.79%	15.67%	100.00%
2010-2011	10.72%	25.25%	11.88%	16.58%	20.89%	14.48%	100.00%
2011-2012	11.20%	26.05%	11.96%	16.65%	21.08%	13.06%	100.00%

Note. Adapted from “Consolidated State Performance Report, 2007-2008, 2008-2009, 2009-2010, 2010-2011, 2011-2012” by Ed Facts, 2013.

Table 5

Number of Migrant Students by Grade Level in Missouri

Academic Year	Ages 3-5	Grades K-3	Grades 4-5	Grades 6-8	Grades 9-12	Out of School	Total
207-2008	160	468	199	257	291	66	1441
2008-2009	216	479	203	241	243	36	1418
2009-2010	100	405	169	208	237	30	1149
2010-2011	96	319	154	217	205	23	1014
2011-2012	101	286	131	191	200	13	922

Note. Adapted from “Consolidated State Performance Report, 2007-2008, 2008-2009, 2009-2010, 2010-2011, 2011-2012” by Ed Facts, 2013.

Table 6

Percentage of Migrant Students by Grade Level in Missouri

Academic Year	Ages 3-5	Grades K-3	Grades 4-5	Grades 6-8	Grades 9-12	Out of School	Total
2007-2008	11.10%	32.48%	13.81%	17.83%	20.19%	4.58%	100.00%
2008-2009	15.23%	33.78%	14.32%	17.00%	17.14%	2.54%	100.00%
2009-2010	8.70%	35.25%	14.71%	18.10%	20.63%	2.61%	100.00%
2010-2011	9.47%	31.46%	15.19%	21.40%	20.22%	2.27%	100.00%
2011-2012	10.95%	31.02%	14.21%	20.72%	21.69%	1.41%	100.00%

Note. Adapted from “Consolidated State Performance Report, 2007-2008, 2008-2009, 2009-2010, 2010-2011, 2011-2012” by Ed Facts, 2013.

Appendix B: Interview Questions/Topics

Part I: Demographic Information

1. What is your role/title?
2. How many years have you worked at this district?
3. How many years have you been an educator?
4. What is your highest level of education?
5. How many years have you worked with migrant students?

Part II: Migrant Students

1. How are migrant students identified in your school/district? What brings migrants to your district?
2. Approximately, what percentage of your student population is migrant?
3. The federal MEP goals are: school readiness, equal access to educational opportunities, increased parental involvement, educator professional development, technological implementation of migrant students' school records to facilitate between-school transfers, and increasing graduation rates of migrant students. What do you think about these outcomes/goals? How are you/district working to meet these outcomes?
4. What is your school's/district's policy regarding migrant students? What does your/district MEP look like? What services do you provide?
5. Who determines this policy? How different/similar do you perceive your/district outcomes to the federal MEP outcomes?
6. How is this policy implemented? What is your role in that implementation?
7. How much direction and from who/what agency do you receive regarding the interpretation and implementation of this policy?
8. What information have you been given regarding the intended outcomes of the migrant education policy? Who determined them?
9. What sort of things does your district do to meet these intended outcomes? Has your district determined/defined other important outcomes? What are they? How do you meet those?
10. Based on your experience with migrant students, what are their greatest struggles and challenges? What are greatest achievements and successes? Are (how about: how are you equipped to handle these struggles, challenges and/or needs? Which are you unable to address?
11. Do you perceive there to be any unintended outcomes of the policy and its interpretation and implementation?
12. What role, if any, do the students, parents, and teachers have in this policy and its interpretation and implementation?
13. What do you perceive to be the differences between migrants following the crop and migrants working in processing plants? Do you think the policy should be implemented and interpreted differently for the different 'types' of migrants?
14. Who evaluates and determines "success" of this policy/program?

15. Is there anything we haven't already talked about yet regarding the MEP or migrant students/families that you think I should know

Appendix C: Informed Consent Script

INFORMED CONSENT

Title of Project: The Implementation of the Migrant Education Policy in Missouri: A Multi-Level Case Analysis

Principle Investigator: Katie L. Piacentini, Ph.D. Candidate, University of Missouri,
Department of Educational Leadership & Policy Analysis.
Klp26b@mail.missouri.edu, 573-673-4621.

Research Advisor: Dr. Emily Crawford, University of Missouri,
Department of Educational Leadership & Policy Analysis.
Crawford@missouri.edu, 573-882-8221.

1. **Purpose of the Study:** The purpose of this study is to explore the migrant education policy as it is implemented across multi levels from the macro level (federal level) to the micro level (school district level). Data will be collected in one-on-one semi-structured interviews. I will inquire about how you perceive migrant education, your understanding of the migrant education policy, how you implement the policy and the directives you are given about the policy

2. **Procedures to be followed:** You will be asked to participate in a 1-1 ½ hour recorded interview and to review a transcript of the interview for accuracy. I will also ask that you be available for follow up questions if more information is needed or if I need help understanding an answer given during the formal interview. The interview will be recorded with a digital recording device, and the principal investigator and a hired transcriber will be the only two people with access to this recording. The principal investigator will hire an individual not associated with this project to transcribe the interview. It will then be returned to you to check that the transcription is an accurate reflection of what was said in the interview.

After I have analyzed data, I will ask you to review my research findings and how I have interpreted the data collected to learn if they make sense to you and you could agree with the conclusions I have drawn from data.

3. **Discomforts and Risks:** Some of the questions are personal and might cause discomfort, and you are in no way compelled to answer any question. The principal investigator will take the highest precaution to minimize any risk to you. The principal investigator will use a pseudonym for you, and your true name will not be recorded in any way. The principal investigator will not collect any other personal identification information from you that could lead to your identification by someone other than herself. This project does not involve any risks greater than those encountered in everyday life.

This study is being conducted primarily for dissertation-related research, though the findings of the study may be later submitted for publication to a scholarly journal or presented at conferences. Though the research findings may be disseminated in different formats as those immediately listed above, the participant's personally identifiable information will not be revealed; pseudonyms will continue to be used at all times.

4. **Benefits:** The benefits to you include an opportunity to share how implementers of the migrant education policy understand and implement the policy across multiple levels. This is an area of research that has not yet been studied in depth. As the topic of education for migrant students continues as a greater part of broader national discussion, it is increasingly important that educators' perspectives are known.

5. Duration/Time: Participants will be asked to participate in a 1-1 ½ interview, with the possibility of a second interview of slightly shorter duration. It is also likely that an additional 15 minute commitment will be needed to verify accuracy of the transcribed interview.

6. Statement of Confidentiality: Your participation in this research is confidential. The data will be stored and secured on the University of Missouri campus. In order to minimize the risk of legal liability for research participants, no personal identification information will be collected from research participants. You will be given pseudonyms, and real names will not be recorded. In addition, you will not be asked your legal status, nor will you be asked about the legal status of other people with whom you have contact. Any and all electronic documents will be kept in password-protected files that are accessible only to the principal investigator. The principal investigator and a hired transcriber will be the only two people with access to the digital recording of interviews given by you. The recording device will be kept in a locked drawer, and the recordings will be kept on the recording device. The Internet might be used to schedule meeting times between you and the principal investigator. The Internet will be used by the principal investigator to transmit a transcription of the interview to you. The purpose of the transmission is so that you can verify that the transcription is an accurate reflection of what you said in the interview. Your confidentiality will be kept to the degree permitted by the technology used. No guarantees can be made regarding the interception of data sent via the Internet by any third parties. The University of Missouri Institutional Review Board may review records related to this project. In the event of a publication or presentation resulting from the research, no personally identifiable information will be shared.

All participant records will be held confidential and all participants will be assigned a pseudonym. All documents will be in password protected files and destroyed 7 years after the study has been completed.

7. Right to Ask Questions: Please contact Katie L. Piacentini at (573) 673-4621 or via email at klp26b@mail.missouri.edu with questions, complaints or concerns about this research. You can also call this number if you feel this study has harmed you. If you have questions regarding your rights as a participant in research, please feel free to contact the Campus Institutional Review Board at (573)882-9585. The MU IRB cannot answer questions about research procedures. Questions about research procedures can be answered by the research team.

8. Voluntary Participation: Your decision to participate in this research is voluntary. You can stop at any time. You do not have to answer any questions you do not want to answer. Refusal to take part in or withdrawing from this study will involve no penalty or loss of benefits you would receive otherwise.

You must be 18 years of age or older to consent to take part in this research study. If you agree to take part in this research study and the information outlined above, I will provide you with a copy of this form.

Appendix D: Email Solicitation Script

To District Personnel:

Good Morning/Afternoon,

My name is Katie and I am a doctoral candidate at the University of Missouri – Columbia. I am currently working on my dissertation that will consist of a multi-level policy implementation analysis of the Migrant Education Policy. I want to understand how the policy is implemented across various levels and in various districts. I understand that your district has migrant students.

The study would involve interviewing district-level personnel (administrators and/or staff) involved with the Migrant program. No students, parents, or teachers would be interviewed. The interviews would last 60-90 minutes and can be conducted in-person, over the phone or via skype, whichever is most conducive to your schedule.

I hope this is something you would be interested in participating. If so, please let me know and we can arrange a time to chat that is conducive to your schedule. Any assistance you could provide would be greatly appreciated!

Thank you in advance for your time.

Katie L. Piacentini
Ph.D. Candidate
University of Missouri - Columbia
Educational Leadership & Policy Studies
cell: (573)673-4621
work: (314)889-4679
Email: klp26b@mail.missouri.edu

To State & Federal Personnel:

Good Morning/Afternoon,

My name is Katie and I am a doctoral candidate at the University of Missouri – Columbia. I am currently working on my dissertation that will consist of a multi-level policy implementation analysis of the Migrant Education Policy. I want to understand how the policy is implemented across various levels and in various districts. I understand that in your role as [ROLE/TITLE] you work migrant students and therefore have an understanding of how the Migrant Education Policy works in Missouri.

Your participation would involve an interview lasting 60-90 minutes conducted in-person, over the phone or via skype, whichever is most conducive to your schedule.

I hope this is something you would be interested in participating. If so, please let me know and we can arrange a time to chat that is conducive to your schedule.

Thank you in advance for your time.

Katie L. Piacentini

Ph.D. Candidate

University of Missouri - Columbia

Educational Leadership & Policy Studies

cell: (573)673-4621

work: (314)889-4679

Appendix E: Coding Patterns and Categories

Levels

- Federal
- State
- Regional
- District

Fed MEP Policy Outcomes

- Identification
- School readiness
- Parental involvement
- Access to education
- Technology
- Records transfers
- Graduation rates

Fed Laws

- MEP: Title I.C
- ELL: Title III
- Free/Reduced Lunch
- Equal Ed
- Civil Rights Act

MO Policy Outcomes

- Increase MAP scores
- Increase ACCESS scores
- ELL – language instruction
- Graduation rates
- Parental involvement

Migrant Needs

- Language instruction
- Basic necessities: food, shelter, doctors, dentists, glasses
- Cycle of poverty
- Student working too
- Fear – undocumented status

Local Context/Culture

- Community involvement
- Community engagement
- Community social services
- Social acceptance
- Social isolation
- Established Latino community
- New Latino community

Language Needs

- Student
- Family
- Student as interpreter/translator
- Language proficiency impact MAP scores

District Programming

- ELL programs
 - Group
 - Individualized
 - Mainstream
 - Pull-out
- Defining program success
 - MAP scores
 - ACCESS scores
 - Attendance
- MEP specific programming
 - Summer camps
 - After-school tutoring
 - Counselors
 - Translators/interpreters
 - Pre-k programs
 - Parent advisory councils
 - Social
 - academic

District Needs/concerns

- Resources: staffing/money
- Not enough time with migrant students
- Lack communication from region/state
- Getting parents more involved

Parental Involvement

- Crop vs processing plant
- Work conflicts
- Poverty
- Fear of government entity

Regional needs/concerns

- Leadership/organization from DESE
- Identification concerns
- Districts lack knowledge of law and requirements
- Differences between fed and state law
- Local control

MELL needs/concerns

- Identifying migrant students
- MAP concerns
- Migrant student language needs
- CNA report: unofficial policy

Appendix F: Missouri MEP Comprehensive Needs Assessment Goals' Solutions

Goal Area 1: Communication Arts Achievement

1.1 We are concerned that migrant students are not achieving at the same level as their peers because of gaps in academic language in reading.		
Data Sources	Need Indicator	Solutions
State Assessment and EOC scores staff survey parent survey ACCESS results	35% of migrant students were proficient on the MAP for reading, language arts compared to 54% of non-migrant students 17% of migrant students were proficient in English on the ACCESS compared to 23% of all students 77% of staff indicated migrant students need additional reading instruction, 68% for writing instruction, and 61% for English language instruction	1a) Provide professional development for teachers who work with migrant students on strategies for improving academic language development and information about the unique needs of migrant students. 1b) Provide instructional assistants for tutoring in before and after school programs. 1c) Provide small group interventions following a Response to Intervention (RTI) model for migrant students who are below proficient in reading. 1d) Provide parent involvement through home/school liaisons. 1e) Use appropriate formative and summative assessments for determining student needs and target instruction. 1f) Provide training in using MSIX for proper student placement and record transfer. 1g) Provide summer school. 1h) Increase access to needed educational tools and socio-economic services.

Goal Area 2: Mathematics Achievement

2.1 We are concerned that migrant students are not achieving at the same level as their peers because of gaps in academic language in math.		
Data Sources	Need Indicator	Solutions
staff survey parent survey ACCESS results	17% of migrant students were proficient in English on the ACCESS compared to 23% of all students 61% of staff indicated that migrant children need additional language instruction 47% of parents indicated their children needed more math instruction	2a) Provide professional development for teachers who work with migrant students on strategies for improving academic language development and information about the unique needs of migrant students. 2b) Provide assistance to families through inviting them to participate in math programs and strategies for teaching math skills in the home. 2c) Provide supplemental English language instruction through before or after school programs and direct supplemental academic language instruction for math vocabulary.
2.2 We are concerned that migrant students have gaps in conceptual and procedural math skills.		
Data Sources	Need Indicator	Solutions
State Assessment and EOC scores	30% of migrant students were proficient on the MAP for math, compared to 55% of non-migrant students	2d) Provide additional instruction in conceptual and procedural math through summer school, extended instruction time, and individualized/ specialized instruction.

Goal Area 3: School Readiness

3.1 We are concerned that migrant students are not receiving early literacy skills prior to starting formal education.		
Data Sources	Need Indicator	Solutions
Staff Needs Assessment Survey Parent Needs Assessment Survey	67% of staff say that more information about strategies to support education in the home is needed 65% of staff say that parent literacy and language instruction is needed 56% of parents of preschoolers indicated needing services to prepare young children for kindergarten	3a) Provide parent involvement for families to help them use strategies for improving pre-literacy skills. 3b) Provide resources to help families implement the strategies. 3c) Coordinate services with existing early childhood programs.
3.2 We are concerned that migrant preschoolers do not have the language skills necessary for success in school.		
Data Sources	Need Indicator	Solutions
Staff Needs Assessment Survey Parent Needs Assessment Survey	61% of staff indicated that migrant children need additional language instruction 49% indicated students needed aid in participating in preschool programs 36% of parents indicated their children needed help learning English	3d) Ensure migrant students have access to early childhood programs where available. 3e) Provide professional development for staff working with migrant students on developing language skills in young students.
3.3 We are concerned that migrant preschoolers do not have access to comprehensive health and community services.		
Data Sources	Need Indicator	Solutions
Staff Needs Assessment Survey Parent Needs Assessment Survey	51% of staff say that greater access to health/vision/dental care is needed 48% of parents indicated their children needed greater access to dental, vision, or health care	3f) Provide families with information on medical and community services. 3g) Coordinate services with existing community-based education programs: school district programs, Head Start, churches, community centers, Parents as Teachers

Goal Area 4: High School Graduation

4.1 We are concerned that migrant students are not achieving in the core content courses due to academic language gaps, gaps in academics, and mobility.

Data Sources	Need Indicator	Solutions
EOC Assessment results ACCESS results Parent Survey Staff Survey	32% of migrant high school students were proficient in math compared to 60% of all students 51% of migrant high school students were proficient in reading compared to 74% of all students 36% of migrant students are LEP compared to 2% of all students. 47% of parents indicated that math instruction was needed and 43% indicated reading instruction was needed	4a) Hire tutors for supplemental and individualized English language instruction and content area instruction.
4.2 We are concerned that migrant students are not seeking or receiving training for college and career readiness due to a lack of support in the home.		
Data Sources	Need Indicator	Solutions
Staff Survey Parent Survey	67% of staff say that more information about strategies to support education in the home is needed 52% of parents of high school students indicated their children needed credit-related secondary counseling and 48% indicated their children needed college and career counseling	4b) Provide professional development for teachers and counselors who work with migrant students on unique needs of migrant students and options for college and career readiness. 4c) Participate in programs such as Destination Graduation (used in Neosho) to promote college and career readiness. 4d) Ensure migrant students have access to college visits and career fairs.
4.3 We are concerned that migrant families do not understand the graduation requirements.		
Data Sources	Need Indicator	Solutions
Staff Survey Parent Survey	65% of staff indicated that greater parent literacy and language instruction was needed 48% of parents of high school students indicated they needed more information about opportunities for after high school	4e) Provide parent involvement as early as middle school to help families understand graduation requirements.
4.4 We are concerned that migrant students do not have access to comprehensive health and community services.		
Data Sources	Need Indicator	Solutions
Staff Survey Parent Survey	51% of staff say that greater access to health/vision/ dental care is needed 48% of migrant parents indicated greater access to dental, vision, or health care was needed for their children	4f) Coordinate with local service providers to ensure that migrant students gain access to health services, legal services, and other social services as needed for participation in education

The Missouri MEP Comprehensive Needs Assessment and Service Delivery Plan. (June 13, 2013). pp. 23-25.

Appendix G: MO MEP Evaluation Plan Questions

Questions answered by implementation data include the examples below:

- ▶ Were local projects implemented as described in their approved MEP applications? If yes, what worked and why? If not, what didn't work and why not?
- ▶ What challenges were encountered by the MEP? What was done to overcome these challenges?
- ▶ What adjustments can be made to the MEP to improve instruction, professional development, and the involvement of migrant parents?
- ▶ To what extent were the procedures used for identification and recruitment of eligible migrant students found to yield reliable results?
- ▶ To what extent were MEP staff better prepared to help migrant students close the achievement gap?
- ▶ To what extent did migrant parents report being involved with their children's learning in literacy, mathematics, school readiness, and high school graduation?

Questions answered by outcome data include the examples below.

- ▶ To what extent did migrant students demonstrate proficiency on the MAP in Communication Arts and Mathematics?
- ▶ To what extent did 3-4 year old PK migrant children receive referrals to appropriate early childhood education programs designed to increase readiness for school?
- ▶ To what extent did secondary migrant students earn sufficient credits to remain on track for graduation?

The Missouri MEP Comprehensive Needs Assessment and Service Delivery Plan. (June 13, 2013). pp. 30.

Appendix H: MO MEP Performance Targets

- **Communication Arts and Mathematics:** In 2002, Missouri established an AYP timeline that requires all students to meet or exceed the State's proficiency levels in communication arts and mathematics not later than 2013-2014.
- **School readiness:** For children, school readiness means being prepared in key dimensions of early learning and development (social and emotional, language and literacy, cognitive, motor, health and physical well-being, and positive attitudes and behaviors toward learning.) [School Readiness definition from Early Learning section of dese.mo.gov]
- **High school graduation:** The graduation rate goal for Missouri high schools is 85% to meet the AYP additional indicator. High schools with graduation rates between 75-85% are expected to demonstrate improvement of at least 2 percentage points per year. High schools with graduation rates of less than 75% are expected to improve at least 5 percentage points per year.

(CNA Report, 2013, p. 28)

Appendix I: Measureable Program Outcomes and Statewide Service Delivery Strategies

Exhibit 18: Communication Arts Strategies and MPOs

NEED/CONCERN: We are concerned that migrant students are not achieving at the same level as their peers in communication arts because of gaps in academic language.	
Strategy	MPO
<p>1.1 Provide supplemental instructional support for migrant students in the areas of communication arts, literacy, and language development. Examples include extended day programs, peer tutoring, mentoring, and summer school.</p>	<p>1a) By the end of 2013-14 and each year thereafter, the gap in proficiency in communication arts on the State standardized test between migrant students participating in supplemental supports during the regular school year and non-migrant students will decrease by 3%.</p>
<p>1.2 Provide professional development opportunities that include the unique needs of migrant students for teachers of migrant students in areas such as data analysis for data-driven instruction, academic language, and differentiating instruction within communication arts.</p>	<p>1b) By the end of 2013-14 and each year thereafter, 80% of teachers of migrant students participating in migrant-sponsored professional development will report on a survey that they applied the communication arts strategies from the training to their instruction.</p>
<p>1.3 Provide parent involvement opportunities relating to improving educational success in communication arts for migrant students including PAC meetings, parent training, and notification of opportunities for involvement.</p>	<p>1c) By the end of 2013-14 and each year thereafter, 80% of migrant parents participating in parent involvement activities (such as Parent Advisory Council meetings) will report on a parent survey that the activity helped them support their children's reading achievement.</p>

Exhibit 19: Mathematics Strategies and MPOs

NEED/CONCERN: 1. We are concerned that migrant students are not achieving at the same level as their peers because of gaps in academic language in math. 2. We are concerned that migrant students have gaps in conceptual and procedural math skills.	
Strategy	MPO
<p>2.1 Provide supplemental instructional support for migrant students in the area of mathematics with a focus on academic language development. Examples include extended day programs, peer tutoring, mentoring, and summer school.</p>	<p>2a) By the end of the 2013-14 school year and each year thereafter, the gap in proficiency in mathematics on the State standardized test between migrant students participating in supplemental supports during the regular school year and non-migrant students will decrease by 3%.</p> <p>2b) By the end of the 2013-14 school year and each year thereafter, 80% of students receiving language of math instruction will demonstrate a 9% gain on district-approved semester assessment (such as the language of math portion of the ACCESS assessment).</p>
<p>2.2 Provide supplemental instruction in conceptual and procedural math through summer school (e.g. Math MATTERS), extended instruction time, and individual/specialized instruction.</p>	<p>2c) By the end of the 2013-14 school year and each year thereafter, 80% of migrant students will demonstrate a 9% gain on a district-approved pre/post assessment (such as the Math MATTERS summer assessment) of math skill development.</p>

<i>NEED/CONCERN: 1. We are concerned that migrant students are not achieving at the same level as their peers because of gaps in academic language in math. 2. We are concerned that migrant students have gaps in conceptual and procedural math skills.</i>	
<u>Strategy</u>	<u>MPO</u>
2.3 Provide professional development opportunities that include the unique needs of migrant students for teachers of migrant students in areas such as data analysis for data-driven instruction, academic language, and differentiating instruction within the area of mathematics.	2d) By the end of 2013-14 and each year thereafter, 80% of teachers of migrant students participating in migrant-sponsored professional development will report on a survey that they applied the mathematics strategies from the training to their instruction.
2.4 Provide parent involvement opportunities relating to improving educational success in mathematics for migrant students including PAC meetings, parent training, and notification of opportunities for involvement.	2e) By the end of 2013-14 and each year thereafter, 80% of migrant parents participating in parent involvement activities (such as Parent Advisory Council meetings) will report on a parent survey that the activity helped them support their children's math achievement.

Exhibit 20: School Readiness Strategies and MPOs

<i>NEED/CONCERN: We are concerned that migrant students are not receiving early literacy skills prior to starting formal education.</i>	
<u>Strategy</u>	<u>MPO</u>
3.1 Provide family literacy instruction and materials to assist migrant families in developing their children's school readiness through learning strategies implemented in the home.	3a) By the end of 2013-14 and each year thereafter, 80% of migrant parents participating in family literacy activities will report on a parent survey that the strategies helped them prepare their children for school.
3.2 Provide access to early childhood education services, summer school, and/or home visits through coordination with existing services such as Parents as Teachers, Title I preschools, community preschools, Missouri Preschool Project, and Head Start.	3b) By the end of 2013-14 and each year thereafter, 80% of migrant children ages 4 or 5 and not in kindergarten will receive referrals to appropriate early childhood education services as indicated on the district migrant report.

Exhibit 21: High School Graduation Strategies and MPOs

<i>NEED/CONCERN: We are concerned that migrant students are not achieving in the core content courses due to academic language gaps, gaps in academics, and mobility.</i>	
<u>Strategy</u>	<u>MPO</u>
4.1 Provide supplemental instructional and support services to increase credit accrual leading to graduation through services such as credit recovery, college and career readiness activities, and distance learning.	4a) By the end of the 2013-14 school year and each year thereafter, the dropout rate for migrant students will decrease by 0.5%.
4.2 Provide professional development opportunities that include the unique needs of migrant students for teachers of secondary-age migrant students in areas such as dropout prevention, college and career readiness, and distance education.	4b) By the end of the 2013-14 school year and each year thereafter, 80% of teachers of migrant students participating in migrant-sponsored professional development will report on a survey that they applied the college and career readiness strategies from the training to their instruction.

<i>NEED/CONCERN: We are concerned that migrant students are not achieving in the core content courses due to academic language gaps, gaps in academics, and mobility.</i>	
<u>Strategy</u>	<u>MPO</u>
4.3 Provide parent involvement opportunities and instruction relating to the importance of graduation, U.S. requirements for graduation, understanding student progress reports, and college and career goal setting.	4c) By the end of 2013-14 and each year thereafter, 80% of migrant parents participating in parent involvement activities related to high school graduation will report on a parent survey that the activity helped them support their children in making progress toward high school graduation.
4.4 Provide supplemental support services to eligible migrant students (ages 3 through 21) to meet the locally identified needs of migrant students such as resource lists, medical/dental/vision services, necessary school supplies, clothing, transportation, and other allowable support services.	4d) By the end of the 2013-14 school year and each year thereafter, 80% of staff involved in providing support services will report on a staff survey that the services met the needs of migrant students.

The Missouri MEP Comprehensive Needs Assessment and Service Delivery Plan. (June 13, 2013). pp. 28-30.

VITA

Katie L. Piacentini was born in St. Louis, Missouri. After completing high school at Duchesne High School in St. Charles, Missouri, in 1996 she attended St. Louis University for two years. She transferred to the University of Missouri – St. Louis where she earned a Bachelor of Arts in English in 2001. Following her undergraduate experience, she completed a Master of Education in Educational Administration from the University of Missouri – St. Louis in 2003. In 2005, she began her doctoral program in Educational Leadership and Policy Analysis at the University of Missouri. During her doctoral studies, she worked on several different research projects until accepting a full-time position in 2011 at Fontbonne University as an assessment coordinator for the College of Business. Over the last four years, she advanced to her current position as Director of Accreditation and Academic Support.