

# Tennessee Migrant Education Program

## Continuation of Services Form

### Continuation of Services (COS)

Under the Every Student Succeeds Act (ESSA), a migratory student may continue to receive Migrant Education Program (MEP)-funded services according to the definitions below:

1. A migratory child who reaches the end of eligibility during a school term shall be eligible for services until the end of such term.
2. A migratory child who reaches the end of eligibility may continue to receive services for one additional school year, but only if comparable services are not available through other programs.
3. Secondary school students who were eligible for migratory services in secondary school may continue to be served through credit accrual programs until graduation.

*\*Credit accrual programs are typically administered by third-party agencies through correspondence courses or online services. This program allows migratory students to earn credits for coursework in which they have not been previously enrolled or to earn partial credits for incomplete coursework resulting from their migratory lifestyle.*

### Funding

Although there is a provision to extend MEP services to students who are eligible for Continuation of Services (COS), there is no additional federal funding to the State or to LEA subgrantee funding for these students. The MEP-funded local education agencies (LEAs) that choose to provide the COS may continue to use the Title I, C funding currently or previously awarded to serve COS-approved students. The unfunded LEAs whose migratory students are served by the state contractor, Arroyo Research Services (ARS), should coordinate with ARS to determine the needs of the students.

### Categorical Eligibility for Free/Reduced Lunch

Students who are under the COS policy are allowed the previous categorical eligibility for free/reduced lunch (FRL) benefit, and their names/IDs should be included in the list submitted to the school nutrition office. The list of migratory students eligible for FRL should be updated after 30 operating days of the subsequent school year.

### Duration of Eligibility for Free/Reduced Lunch

After an eligibility determination is made, a child's eligibility status remains in effect for the remainder of the school year and continues for up to 30 operating days into the subsequent school year. At the conclusion of the 30 operating days in the subsequent school year, the LEA must determine household eligibility for free or reduced-price meals either through direct certification or through its regular application process.

## Data

The migratory students who are served through the COS provision are coded (01, 02, 03) in MIS2000/TN Migrant to reflect this temporary status.

## Transfer of Continuation of Services

- a. A Tennessee LEA that receives a migratory student previously approved for COS may choose to honor the sending LEA's decision and resume services to the student until the expiration of the COS.
- b. In general, COS approvals in Tennessee will not be honored across interstate MEPs.

## To Determine if a Student is Potentially Eligible for Continuation of Services:

- 1) Review the student's end-of-eligibility date to confirm that the student's MEP eligibility will be ending during one of the terms (Fall, Spring, or Summer sessions). If a student's MEP eligibility period ends during one of these terms, the student may receive services until the end of the term without completing additional documentation. If a student's eligibility is not ending, the student is not eligible for COS.
- 2) If the student's eligibility ends during one of the terms:
  - a. Determine if the student's unmet needs are addressed by the general school program. If so, then COS is not allowed.
  - b. Determine whether migratory children who are designated Priority for Service (PFS) are served. If not, the MEP should first serve eligible PFS students before considering COS for students whose eligibility will be ending.
- 3) Review of the comparable services available within the LEA, including:
  - a. Instructional support services (tutoring, summer school, etc.)
  - b. Supplemental support services (humanitarian, vision, dental, health, medical services, clothing)
  - c. Student advocacy
  - d. Enrollment assistance
  - e. Referrals to community agencies
  - f. Graduation plan/goal setting
- 4) If comparable services are not available in the LEA, then the student may be eligible for COS.

**Comparable Services Scenario #1:** A 5th grade migratory student will reach his End of Eligibility (EOE) in November 2025. The district may continue to serve this student until the end of the fall term in December 2025. The MEP-funded tutor assigned to this student has been providing instructional support services once a week in ELA or math, and the district will have no other tutor available or after-school services to offer comparable services to this student during the spring term. The district has been providing humanitarian services based on the student's Individual Needs Assessment (INA), which the student still requires. The district may choose to apply for COS for this student to extend the math and ELA tutoring through the spring term and with the *option* to continue services into the next academic year.

**Comparable Services Scenario #2:** An 11th grade migratory student will reach her End of Eligibility (EOE) in February 2025. The district may continue to serve this student until the end of the spring term in May 2025. The district is planning MEP-funded visits to multiple college campuses for all MEP high school students as a part of its CTE-based summer services. The district is not offering or providing college visits this summer to other non-migratory students, and no comparable services exist for this student. The district has not been providing humanitarian services to this student, and there are no identified needs. The district may choose to apply for COS for this student to include her in the summer services program and with the *option* to continue services into the next academic year.

**Comparable Services Scenario #3:** A 3rd grade migratory student will reach his End of Eligibility (EOE) in January 2026. The district may continue to serve this student until the end of the spring term in May 2026. The MEP-funded tutor assigned to this student has been providing instructional support services after school in ELA. The district has been providing humanitarian support to this student, and all identified needs are currently met. The student has failed the state ELA assessment and is not on grade level. The district MEP is considering applying for COS for this student to provide summer services in ELA. The district, however, will provide remediation during the summer months to all third graders who failed the assessment. Since the district is offering comparable services to all 3rd grade students, the MEP does not need to apply for COS for this student.

**For LEAs that wish to provide services under definition (2) or (3) of the [Continuation of Services \(COS\)](#) policy above, the following steps should be completed:**

1. If those criteria are met, then the Local Education Agency (LEA) should complete the COS Form for the student whom the LEA is designating as continuing to receive services. The form should be completed and submitted to the State MEP office 30 days prior to the student's end of eligibility date. Each form should be for an individual student and include the following information:
  - a. student MIS2000/TNMigrant ID number (do not include student name or other personally identifiable information),
  - b. state ID (if applicable),
  - c. relevant information regarding the availability of comparable services,
  - d. a description of the services the student is currently receiving (services during COS are contingency services based on student need and not necessarily the complete list of services the student was receiving before the end of eligibility)
  - e. any extenuating circumstances regarding this request, and
  - f. an explanation of the reason for COS (either #2 or #3 above), including the rationale for the COS request.
2. Submit the completed COS form to [Hannah.Gribble@tn.gov](mailto:Hannah.Gribble@tn.gov). The Tennessee Department of Education (department) will review the submission and respond with an acknowledgment via email.
3. If approved, the form will be sent to the Arroyo Research Services (ARS) data team.
4. Upon receipt of the approved COS form from the department, the ARS data team will enter the COS designation into TNMigrant.

### Continuation of Services Request Form

Please do not include any personally identifiable information (PII), i.e., do not include student names or other identifiable information. Please complete and submit one form for each migratory student 30 days before the end of eligibility (EOE) date.

<b>LEA Name</b>	
<b>Person Making the Request</b>	
<b>MIS2000 ID/TNMigrant</b> <i>(Complete one form per student.)</i>	
<b>Student's State ID (if applicable)</b>	
<b>COS Request Options</b> <i>(check all that apply)</i>	<input type="checkbox"/> Spring term of the current school year <input type="checkbox"/> Summer term of the current school year <input type="checkbox"/> Subsequent school year (all or part)
<b>Comments and Explanation</b>  a. Relevant information regarding the availability of comparable services: Instructional Support Services (tutoring), Supplemental Support Services (humanitarian-vision, dental, health, medical, or clothing services), advocacy, enrollment assistance, referrals to community agencies, graduation plan or goal setting, b. A description of the services the student is currently receiving, c. Any extenuating circumstances regarding this request, and d. An explanation with the reason for COS (either #2 or #3 above), including the rationale for the COS request.	

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Submit completed form to:

Dr. Hannah Gribble, Title III and Migrant Education Program Grant Manager  
Tennessee Department of Education  
[Hannah.Gribble@tn.gov](mailto:Hannah.Gribble@tn.gov)