



# **NORTH CAROLINA DEPARTMENT OF PUBLIC INSTRUCTION**

Maurice "Mo" Green, Superintendent of Public Instruction

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**To:** North Carolina School District Leaders

**From:** Alex Charles, Senior Director  
Office of Federal Programs

Dr. Heriberto Corral, OFP Specialty Programs Section Chief  
Office of Federal Programs

**Date:** September 25, 2025

**Re:** Using the Migrant Education Program Certificate of Eligibility (COE) for Enrollment

## **Supporting Enrollment for Migratory Children**

One of the guiding principles of the Every Student Succeeds Act (ESSA), Title I, Part C – Migrant Education Program is to make sure that migratory children can begin school without delay and with as few barriers as possible. ESSA requires states and districts to actively remove barriers to enrollment, attendance, and academic success. This includes making sure that children are enrolled immediately, even if certain records, such as immunization forms, academic transcripts, or proof of residence, are not available on the first day.

For migratory families, the process of providing proof of residence can be especially difficult. Families may have just moved to the district, may be living in temporary housing, or may not have access to standard documentation that is usually required. If a district delays enrollment while waiting for paperwork, children can lose valuable instructional time.

## **The Role of the Certificate of Eligibility**

To address this challenge, federal law requires that each eligible migratory child be documented on a Certificate of Eligibility (COE). The COE captures the essential information about the family's most recent move, their current residence, and qualifying work. This document is completed only by trained and certified recruiters and is reviewed through strict state and federal oversight. Because of this process, the COE is considered a federally verified and reliable record.

### **OFFICE OF FEDERAL PROGRAMS**

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Accepting the COE as proof of residence serves two important purposes:

- It provides districts with the same assurance of residence they would seek from a utility bill, lease agreement, or similar document.
- It ensures that migratory children are not turned away or delayed in starting school, consistent with ESSA's protections.

## Why This Matters

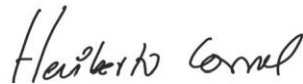
Every child deserves a seamless transition into school, no matter how often their family may need to move for work. For migratory children, each day of learning is essential. Using the COE as proof of residence is not only legally sound, it is also educationally necessary. It prevents unnecessary barriers, reduces duplication of paperwork, and keeps the focus where it belongs: helping students succeed.

## Moving Forward

Districts should treat the COE as sufficient documentation of residence during enrollment. By doing so, schools honor both the letter and the spirit of ESSA: immediate enrollment, uninterrupted learning, and equitable access to education for some of our most mobile and vulnerable students.



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