

IDAHO MIGRANT EDUCATION PROGRAM QUALITY CONTROL POLICIES & PROCEDURES

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The Idaho Migrant Education Program (MEP) Identification and Recruitment (ID&R) Quality Control Plan provides a process to ensure that only eligible migrant children are recruited for the MEP and that all eligibility decisions are supported by appropriate documentation. The Plan reflects the statutory requirements of 34 CFR Part 200 Sec. 200.89 MEP allocations; Re-interviewing; Eligibility documentation; and Quality control (see following page). All local projects that receive MEP funding from the Idaho State Department of Education must develop and follow an approved local quality control plan that describes how the LEA intends to follow the guidelines and procedures delineated in the Idaho MEP State plan.

The Idaho MEP Quality Control goals are:

- To identify and recruit all eligible migrant children residing in Idaho.
- To ensure that proper MEP eligibility determinations are made in a collaborative manner by MEP personnel.
- To ensure that proper MEP eligibility determinations are supported by accurate documentation.

These goals will be accomplished by the following three components:

- Recruiter Quality Controls
- Proper Eligibility Determinations and Documentation Submission Quality Controls
- Prospective Re-Interviewing

Each component is of equal importance; all three must be implemented to achieve high quality ID&R in the Idaho MEP.

**Federal Register: July 29, 2008 Volume 73, Number 146 Rules and Regulations
Part IV United States Department of Education
34 CFR Part 200
Improving the Academic Achievement of the Disadvantaged; Migrant Education
Program; Final Rule**

**Sec 200.89 MEP Allocations; Re-Interviewing; Eligibility Determination; and
Quality control**

(d) Responsibilities of an SEA to establish and implement a system of quality controls for the proper identification and recruitment of eligible migratory children. An SEA must establish and implement a system of quality controls for the proper identification and recruitment of eligible migratory children on a statewide basis. At a minimum, this system of quality controls must including the following components:

- (1) Training to ensure that recruiters and all other staff involved in determining eligibility and in conducting quality control procedures know the requirements for accurately determining and documenting child eligibility under the MEP.
- (2) Supervision and annual review and evaluation of the identification and recruitment practices of individual recruiters.
- (3) A formal process for resolving eligibility questions raised by recruiters and their supervisors and for ensuring that this information is communicated to all local operating agencies.
- (4) An examination by qualified individuals at the SEA or local operating agency level of each COE to verify that the written documentation is sufficient and that, based on the recorded data, the child is eligible for MEP services.
- (5) A process for the SEA to validate that eligibility determinations were properly made, including prospective re-interviewing as described in paragraph (b)(2).
- (6) Documentation that supports the SEA's implementation of this quality-control system and of a record of actions taken to improve the system where periodic reviews and evaluations indicate a need to do so.
- (7) A process for implementing corrective action if the SEA finds COE's that do not sufficiently document a child's eligibility for the MEP, or in response to internal State audit findings and recommendations, or monitoring or audit findings of the Secretary

Authority: 20 U.S.C 6391-6399, 6571, 7844(d); 18 U.S.C. 1001.

TRAINING

(1) Training to ensure that recruiters and all other staff involved in determining eligibility and in conducting quality control procedures know the requirements for accurately determining and documenting child eligibility under the MEP.

The Idaho Department of Education (SDE) carries out the following required trainings:

- A. Idaho MEP policy requires family liaisons/recruiters who will be completing a COE during the school year to attend one Fall and one Spring State training, and one Fall and Spring Regional training.
- B. Regional ID&R Coordinators are required to attend one National Fall conference and 2 State trainings. Regional ID&R Coordinators will conduct two Regional trainings for family liaisons/recruiters and district MEP directors/coordinators)
- C. District MEP directors/coordinators will attend one State training **and** one Regional training.
- D. Upon the State's decision, migrant family liaisons/recruiters will partake in additional trainings as SDE sees necessary.

New Recruiter Certification Procedures

Idaho MEP policy requires that new recruiters demonstrate that they can conduct interviews with migrant families and complete a COE on their own.

The recruiter is required to complete the following requirements:

- A. New migrant family liaisons/recruiters will be trained by the SDE and Regional ID&R Coordinators on COE completion, ID&R and eligibility
- B. Fieldwork
 - a. Interviewing protocol—minimum of 3 interviews accompanied by a Regional ID&R Coordinator or experienced migrant family liaison/recruiter
 - b. COE protocol—successful completion of a minimum of 5 COE's while accompanied by a Regional ID&R Coordinator or experienced migrant family liaison/recruiter

When a migrant family liaison has completed these requirements, the Regional ID&R Coordinator will notify SDE and request the recruiter be certified. A certificate will then be granted.

SUPERVISION AND ANNUAL REVIEW AND EVALUATION

(2) Supervision and annual review and evaluation of the identification and recruitment practices of individual recruiters.

The Idaho Department of Education requires supervision, annual review and evaluation of individual migrant family liaisons/recruiters by their LEA supervisor.

The Idaho MEP policy for the completion of the supervision, annual review and evaluation of the identification and recruitment (ID&R) practices of individual recruiters incorporates the following procedures:

- A. The LEA will use the review of all COEs as an evaluation tool.
- B. Ongoing problems with a migrant family liaison/recruiter must be reported to the LEA Migrant Director/Coordinator by the State MEP or Regional ID&R Coordinator.
- C. The MEP Recruitment Log is reviewed by the LEA Migrant Director/Coordinator monthly to assure proper documentation is being maintained.

The above terms must be met by LEA Migrant programs to ensure the Idaho MEP is in compliance with the USED/OME rules and regulations.

PROCESS FOR RESOLVING ELIGIBILITY QUESTIONS

(3) A formal process for resolving eligibility questions raised by recruiters and their supervisors and for ensuring that this information is communicated to all local operating agencies.

The Idaho Department of Education (SDE) develops and implements a process for resolving eligibility questions and ensures that information on the process is communicated to LEA Migrant Directors/Coordinators and family liaisons/recruiters.

Idaho MEP policy for resolving eligibility questions raised by migrant family liaisons/recruiters and Regional ID&R Coordinators incorporates the following procedures (see Eligibility Determination Protocol (Appendix A) and Decision Making Chain of Command (Appendix B)).

- A. LEA Migrant family liaisons/recruiters eligibility questions are sent to Regional ID&R Coordinator.
- B. If Regional ID&R Coordinator is unable to answer eligibility questions, it is then forwarded on to the State MEP Coordinator.
- C. If the State MEP Coordinator is unable to answer the eligibility question, the eligibility question is forwarded on to the USDE Office of Migrant Education (OME).

All efforts will be made to provide answers back to the LEAs on eligibility questions in the order they come in to the SDE.

CERTIFICATE OF ELIGIBILITY (COE) QUALITY CONTROL PROCEDURES

(4) An examination by qualified individuals at the SEA or local operating agency level of each COE to verify that the written documentation is sufficient and that, based on the recorded data, the child is eligible for MEP services.

The Idaho Department of Education (SDE) Migrant Education Program develops and implements COE quality control processes.

Idaho MEP policy for providing quality control of the COE incorporates the following procedures:

- A. As directed by the Idaho MEP, LEA Migrant directors/coordinators, Regional ID&R Coordinators and the Idaho MEP Administrative Assistant review 100% of COEs submitted by LEA Migrant family liaisons/recruiters. See Flow of COE (Appendix C)
- B. If a COE passes the “Review of Certificate of Eligibility—Errors/Issues” examination (see Appendix D), the COE is placed in the official state files maintained at the Idaho State Department of Education and held for 10 years.
- C. If a COE does not pass the “Review of Certificate of Eligibility—Errors/Issues” examination, the Idaho MEP and LEAs proceed with the following process:
 - 1. The LEA Migrant director/coordinator, Regional ID&R Coordinator or Idaho MEP administrative assistant identifies the errors or issues on each COE and copies are sent back to the appropriate person to make corrections.
 - 2. All corrections made to the COE MUST be documented on the COE Correction Form and copies maintained at the LEA (see Appendix E)
 - 3. The family liaison/recruiter must pull the COE determined to have errors/issues and make the necessary changes to both the returned copy and the LEA/parent copy.
 - 4. All corrections are properly initialed in RED by the recruiter.
 - 5. The recruiter gives/sends the COE to the LEA Migrant director/coordinator and Regional ID&R Coordinator for verification that changes have been made.
 - 6. The recruiter signs the form to verify corrections have been made.
 - a. If corrections require parent initials, the recruiter is to visit the family to secure them.
 - b. If parent initials CANNOT be obtained, the recruiter checks the “Changes Without Parent Initials” box. If the changes don’t affect the eligibility of the student(s), the recruiter must sign on the recruiter line and the LEA Migrant director/coordinator must sign in the appropriate place.
 - 7. The Regional ID&R Coordinator forwards updated COE and corrections form to Idaho MEP for final review and entry into Migrant Student Information System (MSIS).
- D. The COE Correction Form is used by the LEA Migrant director/coordinator, Regional ID&R Coordinator and State MEP to document changes/corrections made to the COE after the original interview has taken place.

1. If the COE Correction Form is coming from the State MEP, it should be returned for State files. Otherwise, all COE Correction Forms are maintained at the LEA level as evidence of quality control documentation.
- E. If a COE does not pass the “Review of Certificate of Eligibility—Errors/Issues” examination, and through the correction process the family COE appears to NOT qualify for the Idaho Migrant Education Program, the Idaho MEP will follow the following steps:
1. A memo will be sent to the LEA explaining the findings.
 2. The LEA will have 30 days to contest the findings and submit additional findings in written form to the Idaho MEP.
 3. If the LEA does not contest the findings and accepts the findings then the Idaho MEP will void the family COE and follow up with a memo to the LEA stating such. It is then the LEAs responsibility to communicate the findings to the family.

VALIDATION OF ELIGIBILITY DETERMINATIONS: PROSPECTIVE RE-INTERVIEWING

(5) A process for the SEA to validate that eligibility determinations were properly made, including prospective re-interviewing as described in paragraph (b)(2).

As of August 28, 2008 it is now a federal requirement that each state Migrant Education Program implements a re-interview process to comply with federal regulation CFR 200.89.

The Idaho State Department of Education (SDE) utilizes the Regional ID&R Coordinators to carry out these re-interviews for federal compliance and quality control. Every three years, the Idaho MEP will contract with an out of state agent to conduct the re-interviews.

The Idaho Migrant Education Program re-interview procedures are as follows:

- A. In March of each year, a random sample is generated out of all students with an EOE three years from 9/1/20xx of each year, indicating a new COE had been completed for that student during the current SY.
- B. The SDE Data manager appends the list onto a data spreadsheet by region. A computerized selection of random names is generated through a formula.
- C. The randomized process occurs in the following way:
 1. In March, all Migrant students with an EOE three years from 9/1/20xx of each year are entered into an excel list.
 2. The list is then randomized by using RAND() function in Microsoft excel.
- D. The State MEP re-interviews the first 80 samples.
- E. The 80 samples are sorted by regions. The Regional ID&R Coordinators switch regions to avoid conflict of interest. The Re-interview Protocol and Guide outlines the responsibilities of the coordinator (Appendix F). They work with the LEA migrant family liaison to arrange the date and time for the re-interview to occur. The family liaison has the initial contact with the family explaining the purpose of the re-interview and confirming date, time and place.
- F. The migrant family liaison accompanies the Regional ID&R Coordinator. However, they are instructed they can't speak or participate while the re-interview is being conducted.
- G. The Regional ID&R Coordinator documents its findings on the Child Eligibility Re-interview Questionnaire (Appendix G). If there is a discrepancy between the original COE and the findings of the re-interview, this is documented on the Re-interview Resolution Document (Appendix H) and arrangements are made to have a third person conduct the re-interview.
- H. The Idaho MEP examines the re-interview results and sends a memo to the LEAs advising them of the re-interview findings.
 - a. If, through the re-interview process, the child/ren is/are verified to be eligible for the Idaho MEP, the LEA will be notified.
 - b. If, through the re-interview process, the child/re is/are found to have been misidentified and is therefore ineligible for the Idaho MEP, the LEA will be notified of these findings; AND the LEA must contest the re-interview finding within 30 days of notification, documenting their efforts.

- i. Should the Idaho MEP decide to interview the family again, the interview will be done by someone other than the original recruiter and the re-interviewer.
 - ii. If the LEA can't provide sufficient written evidence to successfully contest the re-interview findings within 30 days of notification, the Idaho MEP will void that COE.
- I. The Idaho MEP will retain copies of the re-interview paperwork to serve as verification to USED/OME that Idaho has implemented a re-interview process according to regulation CFR 200.89.

DOCUMENTATION

(6) Documentation that supports the SEA's implementation of this quality-control system and of a record of actions taken to improve the system where periodic reviews and evaluations indicate a need to do so.

This document will be the official representation of the Idaho MEP Quality Control Policies and Procedures and the implementation there of.

A record of actions taken to improve the system, where periodic reviews and evaluations indicate a need, will be documented, compiled and held at both the LEA and SEA. Examples of such documentation shall include, but not be limited to: completed COEs with signatures validating accuracy, COE correction forms, training participation certificates, Migrant recruiter log, prospective re-interviewing documentation, etc.

PROCESS OF CORRECTIVE ACTION

(7) A process for implementing corrective action if the SEA finds COE's that do not sufficiently document a child's eligibility for the MEP, or in response to internal State audit findings and recommendations, or monitoring or audit findings of the Secretary

The process for corrective action should the SEA identify a COE that does not sufficiently document a child's eligibility is listed under the COE Quality Control Procedures (4) of this document.

ELIGIBILITY DETERMINATION PROTOCOL (A)

Idaho Migrant Education Program, November 2009

Initial eligibility determination made by **MEP family liaison/recruiter and documented on the Certificate of Eligibility (COE).

If **family liaison/recruiter** is unable to make eligibility determination...

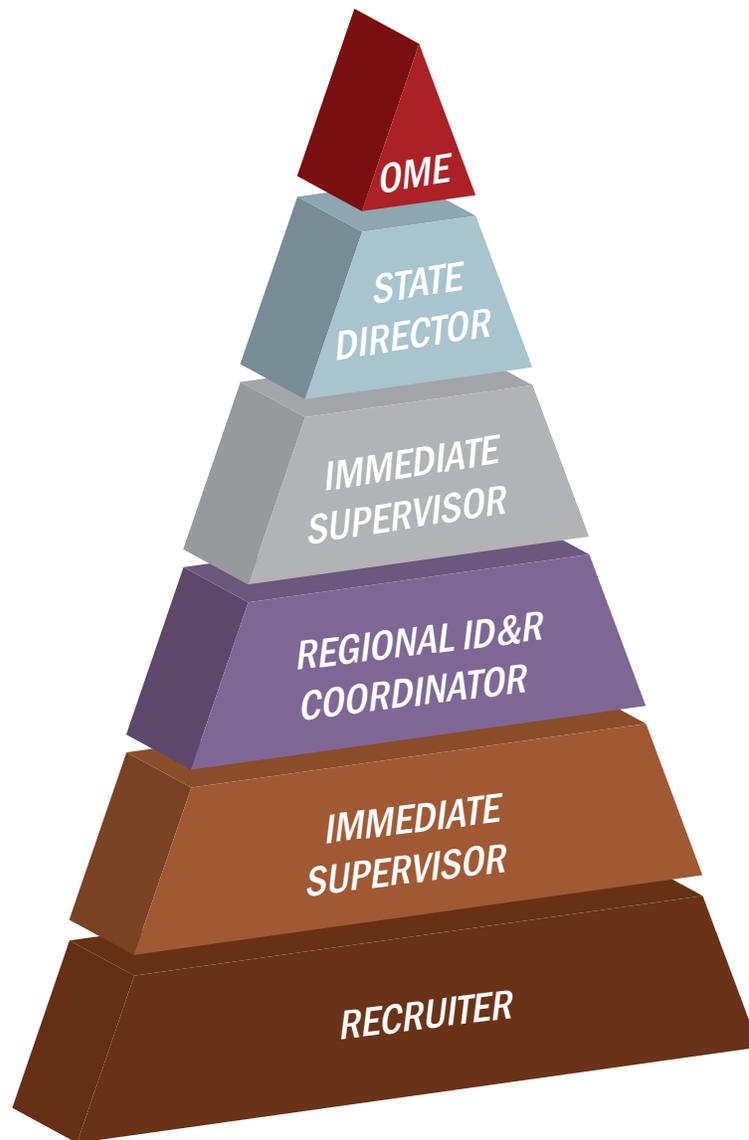
...then contact **Regional ID&R Coordinator** for assistance. Provide all relevant facts, # of children affected, and an analysis of the situation so a proper determination can be made. If Regional ID&R Coordinator is unable to make eligibility determination...

...then contact **State MEP** for eligibility determination. Provide all relevant facts, # of children affected, and an analysis of the situation. If State MEP is unable to make eligibility determination...

...then State MEP will contact the **Office of Migrant Education** and provide all relevant facts, # of children affected, an analysis of the situation and how the Idaho MEP would respond. The final eligibility determination will come from OME

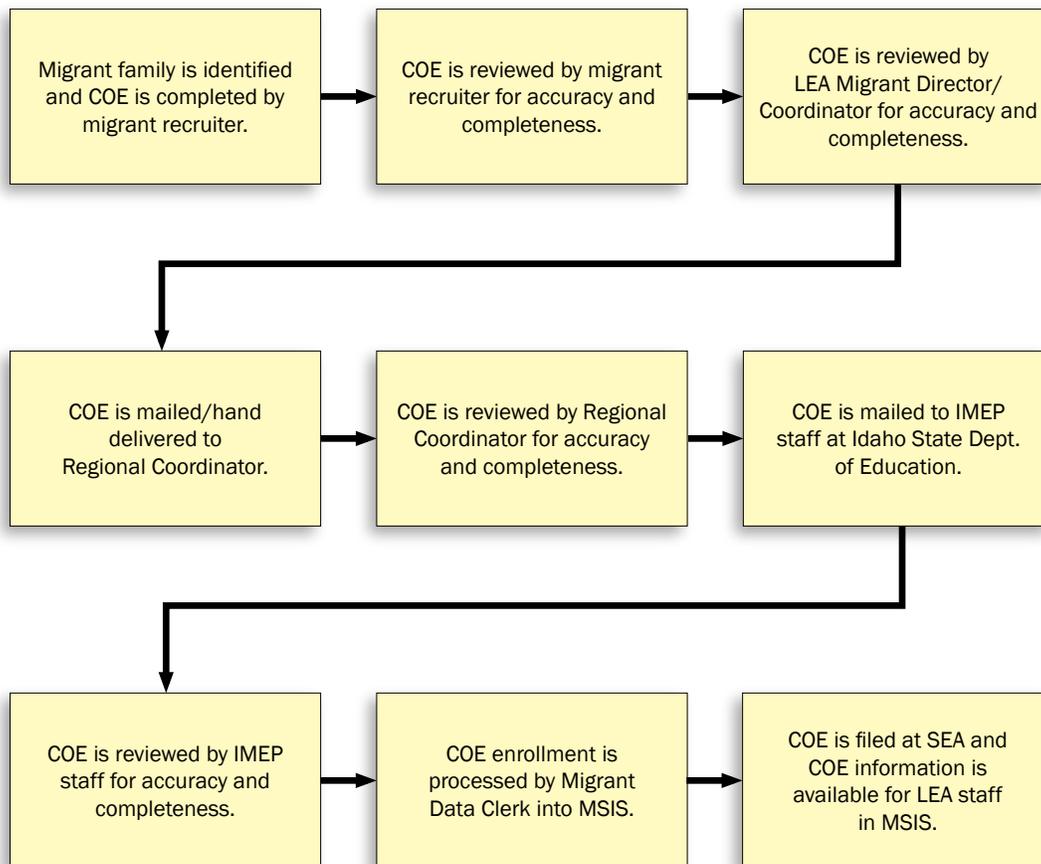
DECISION-MAKING CHAIN OF COMMAND (B)

Idaho Migrant Education Program, November 2009



FLOW OF THE COE (C)

Idaho Migrant Education Program, June 2010



Idaho Migrant Education Program

REVIEW OF CERTIFICATE OF ELIGIBILITY (COE)

EXAMINATION ERRORS/ISSUES CODES (D)

SECTION I – FAMILY DATA

| Code | Error/Issue |
|------|---|
| A1 | Male Parent Guardian Last Name not recorded in I.1 |
| A2 | Male Parent Guardian First Name not recorded in I.2 |
| A3 | Female Parent Guardian Last Name not recorded in I.3 |
| A4 | Female Parent Guardian First Name not recorded in I.4 |
| A5 | Current Address not recorded in I.5 |
| A6 | City not recorded in I.6 |
| A7 | State not recorded in I.7 |
| A8 | Zip not recorded in I.8 |
| A9 | Telephone not recorded or incomplete in I.9 |

SECTION II – CHILD DATA

| Code | Error/Issue |
|------|--|
| B1 | Child Last Name 1 not recorded in II.1 |
| B2 | Child Last Name 2 not recorded in II.2 |
| B3 | Suffix not recorded in II.3 (or a dash “–” not placed if suffix was not applicable) |
| B4 | Child First Name not recorded in II.4 |
| B5 | Child Middle Name not recorded (or a dash “–” was not placed if middle name was not applicable in II.5). |
| B6 | Child Sex not recorded in II.6 |
| B7 | Grade Level not recorded in II.7 |
| B8 | School not recorded in II.8 |
| B9 | Child Birth Date not recorded in II.9 |
| B10 | Child Birth Place not recorded in II.10 |
| B11 | Child is a twin or multiple birth and the MB (multiple birth) box II.11 is not filled |
| B12 | Child Birth Verification Code not recorded in II.12 |
| B13 | Residency Date not recorded or recorded incorrectly in II.13 |
| B14 | Ethnicity or Race not entered or obtained in II.14 |
| B15 | Changes were made to child’s first or last name and parent’s initials were not obtained |
| B16 | Changes were made to child’s date of birth and parent initials were not obtained |
| B17 | Parent Affidavit code was recorded in V Code II.12 |

SECTION III – QUALIFYING MOVE & WORK

| Code | Error/Issue |
|------|--|
| C1 | III.1 Incomplete or recorded incorrectly |
| C2 | III.2.a Incomplete or recorded incorrectly |
| C3 | III.2.b Incomplete or recorded incorrectly |
| C4 | III.2.a “ <input type="checkbox"/> to join or precede the worker” was filled and III.b.i is incomplete or recorded incorrectly |
| C5 | Qualifying Arrival Date is incomplete or recorded incorrectly in III.3 |
| C6 | III.4 Incomplete or recorded incorrectly |
| C7 | III.4.c filled and III.4.i or III.4.ii is/are incomplete or recorded incorrectly |
| C8 | Qualifying Work incomplete or recorded incorrectly in III.5 |
| C9 | III.5.a Incomplete or recorded incorrectly |
| C10 | III.5.b Incomplete or recorded incorrectly |
| C11 | III.5.a “ <input type="checkbox"/> temporary employment’ was filled and III.6 is incomplete or recorded incorrectly OR, vice versa |
| C12 | Changes were made in Section III. Qualifying Move & Work and parent initials were not obtained |

SECTION IV - COMMENTS

| Code | Error/Issue |
|------|---|
| D1 | III.2.b.i (to join) completed, missing comments in Section IV |
| D2 | III.2.b.i (to join) completed, comments need revision in Section IV |
| D3 | III.4.c (seek) box filled, missing comments in Section IV |
| D4 | III.4.c (seek) box filled, comments need revision in Section IV |
| D5 | III.5 (personal subsistence) box filled, missing comments in Section IV |
| D6 | III.5 (personal subsistence) box filled, comments need revision in Section IV |
| D7 | III.6.a (“worker’s statement”) box filled, missing comments in Section IV |
| D8 | III.6.a (“worker’s statement”) box filled, comments need revision in Section IV |
| D9 | III.6.a (“Employer’s statement”) box filled, missing comments in Section IV |
| D10 | III.6.a (“Employer’s statement”) box filled, comments need revision in Section IV |
| D11 | Other comments recorded in Section IV need revisions |

SECTION V – PARENT/GUARDIAN/SPOUSE/WORKER SIGNATURE

| Code | Error/Issue |
|------|--|
| E1 | V.1 Incomplete or recorded incorrectly |

SECTION VI – ELIGIBILITY DATA CERTIFICATION

| Code | Error/Issue |
|------|---|
| F1 | Interviewer did not sign or date COE on line VI.1 |
| F2 | Interviewer signature date on line VI.1 does not match interviewee signature date on line V.1 |
| F3 | Regional Coordinator/Designated SEA Reviewer did not sign or date COE on line VI.2 |

SECTION VII – ANNUAL VERIFICATION

| Code | Error/Issue |
|------|--|
| G-1 | Incomplete, missing information, and/or date |

COE - Other

| Code | Error/Issue |
|------|-------------|
| | |
| | |
| | |
| | |

APPENDIX E

COE CORRECTION FORM (E)

Date of COE Correction: _____ District: _____

Recruiter: _____

Regional ID&R Coordinator _____

Please complete this form after corrections or alterations are made to the COE. If you have any questions, please contact your Regional ID&R Coordinator.

COE

| First Child Name | Qualifying Arrival Date | District # |
|------------------|-------------------------|------------|
| | | |

Error Code

| | |
|------------|--|
| Error Code | |
| | |
| | |

| | |
|--|--------------|
| | Changes made |
|--|--------------|

Errors were corrected and properly initialed

Verified by: _____ Date: _____

| Changes without Parent Initials | |
|---|---|
| Errors were made on the COE while documenting the child(rens) eligibility. Corrections were necessary and parent's initials were unable to be obtained. The corrections do not change the eligibility of the child(ren) therefore, the recruiter has made the necessary corrections and initialed them accordingly. | |
| Recruiter: | Regional ID&R Coordinator or Supervisor |
| | |

IDAHO MIGRANT EDUCATION PROGRAM RE-INTERVIEW PROTOCOL AND GUIDE (F)

Part I: Preparing for the Interview

- Prepare as much of your questionnaire as you can ahead of time.
- Share with the local Migrant Education Program staff member the names of the subjects to be interviewed.
- **DO NOT** call the subject ahead of time to prearrange a time for the interview.
- Simply review the list with the Migrant Education Program staff member in a logical fashion and prepare to visit the first subject of the interview.
- If the subject is home, proceed to **PART II**.
- If the subject is **NOT** home, check the appropriate box on the questionnaire and proceed to next subject on the list. (You must make **NO MORE THAN 2 VISITS** before the subject is removed from the sample.)
- If the subject has moved, check the appropriate box on the questionnaire.

Part II: Conducting the Interview

- Introduce yourself or have the local Migrant Education Program staff member introduce you to the subject.
- Explain the purpose of the visit and any risks to the respondent. For example:

The purpose of our visit is to ask you a few questions that will be used to improve the Migrant Education Program in Idaho and to check our system, not to check on individual families. However, to make sure that children are receiving the correct services, children who are found to be ineligible for migrant education services may be removed from the migrant education program. Your family was randomly selected for this interview. May we visit with you?

(If the subject declines the interview, thank the subject and move on to the next interview)

- Follow the questionnaire in the order it appears.
- **DO NOT** leave any part of the questionnaire blank. If the subject does not wish to respond, not **DID NOT RESPOND** in the space provided.

Part III: Original COE Review

- Remove a copy of the subject's COE from the sealed envelope and compare answers from the interview. If different, explore why.

Part IV: After the Interview

- Thank the subject for his or her cooperation and participation in the re-interview process.
- Present the subject with the book provided by Idaho MEP.

IDAHO MIGRANT EDUCATION PROGRAM CHILD ELIGIBILITY RE-INTERVIEW QUESTIONNAIRE (G)

Eligible (filled out by re-interviewer): Yes No District # _____

Reason for Determination: _____

Date of _____ Attempt #1 Home Not Home Declined Interview

Date of _____ Attempt #2 Home Not Home Moved Away

Verified Eligibility from Other Source (Explain) _____

Other (Explain) _____

Child/Student Information:

Name: _____ Date of Birth: _____

Migrant ID #: _____ Grade: _____

Person(s) Interviewed (Try to interview person who signed COE first):

Interviewee Name: _____ Relationship to child/student: _____

Interviewee Name: _____ Relationship to child/student: _____

Qualifying worker: _____ Relationship to child/student: _____

Home Address: _____

Interviewer: _____ Date of Interview: _____

Person Accompanying Interviewer: _____ Title: _____

Town/City of Interview: _____ State of Interview: _____

Language(s) of Interview: _____ COE Original Interviewer _____

The information as obtained and documented from this interview is correct to the best of my knowledge.

Parent Signature: _____ Date: _____

Interviewer Signature: _____ Date: _____

1. Have you or your spouse moved and taken your child(ren) to find work in agriculture or fishing work?

Yes No

2. When was the most recent move?

3. What specific kind of work were you looking for?

4. What kind of work did you apply for? *(Note if temporary or seasonal)*

5. What kind of work did you obtain? *(Note if temporary or seasonal)* Did you get the job?

6. Did this work play an important part in providing a living for your family?

Yes No

7. When you moved to obtain this work, where did you move from?

8. Where did you move to?

9. At the time of this move did (**name of child/student**) move with or to join you?

Yes, moved with Yes, moved to join (date moved _____) No Self

10. Open the copy of the original COE that you brought. Compare it with the re-interview. Is the information the same? *On all four sections of the COE? Why or Why not? Which of the section(s) did not match? I-Student Data, II-Parent/Guardian Data, VI-Authorization and Permission Statement?*

Yes No

11. Eligible on move other than the COE. *(Please detail)*

IDAHO MIGRANT EDUCATION PROGRAM RE-INTERVIEW RESOLUTION DOCUMENTATION (H)

Name of Child: _____

Migrant Student ID #: _____

School District at time of re-interview: _____

1st re-interviewer name: _____ Date of Interview: _____

Preliminary reason for **ineligibility** determination: _____

2nd re-interviewer name: _____ Date of Interview: _____

Qualification determination: Eligible Not eligible

Secondary reason for **eligibility** determination: _____

Qualification determination: Eligible Not eligible

After both interviewers submitted documentation, in addition to the original COE, the conclusion is that the child has been determined to be: (Please check appropriate box.)

- Eligible
- Ineligible
- Can't determine eligibility or ineligibility
- Unanimous decision