



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

December 18, 2017

The Honorable Steven Staples
Superintendent of Public Instruction
Virginia Department of Education
P.O. Box 2120
Richmond, VA 23218

Dear Superintendent Staples:

Thank you for submitting Virginia's consolidated State plan to implement requirements of covered programs under the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESSA), and of the amended McKinney-Vento Homeless Assistance Act (McKinney-Vento Act).

I am writing to provide initial feedback based on the U.S. Department of Education's (the Department's) review of your consolidated State plan. As you know, the Department also conducted, as required by the statute, a peer review of the portions of your State plan related to ESEA Title I, Part A, ESEA Title III, Part A, and the McKinney-Vento Act using the Department's *State Plan Peer Review Criteria* released on March 28, 2017. Peer reviewers examined these sections of the consolidated State plan in their totality, while respecting State and local judgments. The goal of the peer review was to support State- and local-led innovation by providing objective feedback on the technical, educational, and overall quality of the State plan and to advise the Department on the ultimate approval of the plan. I am enclosing a copy of the peer review notes for your consideration.

Based on the Department's review of all programs submitted under Virginia's consolidated State plan, including those programs subject to peer review, the Department is requesting clarifying or additional information to ensure the State's plan has met all statutory and regulatory requirements, as detailed in the enclosed table. Each State has flexibility in how it meets the statutory and regulatory requirements. Please note that the Department's feedback may differ from the peer review notes. I encourage you to read the full peer notes for additional suggestions and recommendations for improving your consolidated State plan.

ESEA section 8451 requires the Department to issue a written determination within 120 days of a State's submission of its consolidated State plan. Given this statutory requirement, I ask that you revise Virginia's consolidated State plan and resubmit it through OMB Max by January 3, 2018. We encourage you to continue to engage in consultation with stakeholders, including representatives from the Governor's office, as you develop and implement your State plan. If you would like to take more time to resubmit your consolidated State plan, please contact your Office of State Support Program Officer in writing and indicate your new submission date.

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The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.

Please recognize that if we accommodate your request for additional time, a determination on the ESEA consolidated State plan may be rendered after the 120-day period.

Department staff will contact you to support Virginia in addressing the items enclosed with this letter. If you have any immediate questions or need additional information, I encourage you to contact your Program Officer for the specific Department program.

Please note that the Department only reviewed information provided in Virginia's consolidated State plan that was responsive to the Revised Template for the Consolidated State Plan that was issued on March 13, 2017. Each State is responsible for administering all programs included in its consolidated State plan consistent with all applicable statutory and regulatory requirements. Additionally, the Department can only review and approve complete information. If Virginia indicated that any aspect of its plan may change or is still under development, Virginia may include updated or additional information in its resubmission. Virginia may also propose an amendment to its approved plan when additional data or information are available consistent with ESEA section 1111(a)(6)(B). The Department cannot approve incomplete details within the State plan until the State provides sufficient information.

Thank you for the important work that you and your staff are doing to support the transition to the ESSA. The Department looks forward to working with you to ensure that all children have the opportunity to reach their full potential.

Sincerely,

/s/

Jason Botel
Principal Deputy Assistant Secretary,
Delegated the authority to perform the
functions and duties of the position of
Assistant Secretary, Office of
Elementary and Secondary Education

Enclosures

cc: Governor
State Title I Director
State Title II Director
State Title III Director
State Title IV Director
State Title V Director
State 21st Century Community Learning Center Director
State Director for McKinney-Vento Homeless Assistance Act: Education for Homeless
Children and Youths Program

Items That Require Additional Information or Revision in Virginia’s Consolidated State Plan

Title I, Part A: Improving Basic Programs Operated by Local Educational Agencies (LEAs)	
<p>A.2.iii: Eighth Grade Math Exception: Strategies</p>	<p>Virginia Department of Education (VDE) indicates that it will exempt an eighth-grade student who takes a high school mathematics end-of-course assessment from taking the eighth-grade mathematics assessment. The ESEA and its implementing regulations allow this exception only when an eighth-grade student is taking the mathematics end-of-course assessment that the State uses for high school accountability. Because it is unclear which high school assessment VDE uses for accountability and whether VDE would limit the exception only to eighth graders, it is unclear whether the State meets this requirement.</p>
<p>A.4.ii.a: Minimum N-Size for Accountability</p>	<p>VDE indicates in response to requirement A.4.ii.a that it will continue to use a minimum number of 30 students for accountability purposes. However, in responding to requirement A.4.ii.b, VDE indicates it will use a minimum number of students of 30 over 3 years. The ESEA requires an SEA to provide the minimum number of students that the SEA determines is necessary to meet the requirements of any provisions under Title I, Part A of the ESEA that require disaggregation of information by each subgroup of students for accountability purposes, including annual meaningful differentiation and identification of schools. It is unclear whether VDE intends to apply a minimum number of students of 30 each year or, as needed, over a three year period.</p>
<p>A.4.iii.a.1: Academic Achievement Long-term Goals</p>	<p>The ESEA requires a State to identify and describe ambitious long-term goals and measurements of interim progress for improved academic achievement, as measured by grade-level proficiency, on the annual statewide reading/language arts and mathematics assessments, for all students and for each subgroup of students. It is unclear whether VDE meets this requirement because:</p> <ul style="list-style-type: none"> • VDE indicates the year from which baseline data were drawn but does not include those baseline data for its academic achievement long-term goals for all students or each identified student subgroup. • In measuring performance against the long-term goals for all students and each identified student subgroup, VDE includes a measure of individual student growth. That is, rather than measuring only the percent of students achieving grade-level proficiency on the annual statewide reading/language arts and mathematics assessments for the assessment year for which accountability determinations are being made, VDE weights the performance of a student who is proficient or above differently based on the student’s prior performance (i.e., counts a student twice if the student did not score proficient the previous year but scores proficient in the current year or show a specified level of growth).

	<ul style="list-style-type: none"> • In measuring performance against the long-term goals, VDE counts the performance of certain English learners on an assessment other than the reading/language arts assessment (i.e., the State’s English language proficiency assessment). • VDE’s long-term goals and measurements of interim progress do not appear to expect improvement for certain subgroups, appear to expect potentially no improvement for the all students group, and may allow for declines in student performance. Because VDE’s long-term goals and measurements of interim progress for academic achievement do not show improved academic achievement for each subgroup of students, VDE has not met the statutory requirements for the establishment of long-term goals and measurements of interim progress for academic achievement.
<p>A.4.iii.b.1: Long-term Goals for Four-year Adjusted Cohort Graduation Rate</p>	<p>The ESEA requires a State to identify and describe ambitious long-term goals and measurements of interim progress for the four-year adjusted cohort graduation rate for all students and each subgroup to improve graduation rates. It is unclear whether VDE meets this requirement because:</p> <ul style="list-style-type: none"> • VDE provides baseline data for its long-term goals for the four-year adjusted cohort graduation rate for “all students” from its baseline in 2015-2016 but does not provide baseline data for each subgroup. • VDE’s long-term goals do not appear to expect improvement for the all students group and certain subgroups and may allow for declines in student performance; as a result, VDE does not meet the statutory requirements.
<p>A.4.iii.b.2: If Applicable, Long-term Goals for each Extended-year Adjusted Cohort Graduation Rate</p>	<ul style="list-style-type: none"> • VDE provides baseline data for its five-year and six-year adjusted cohort graduation rate for all students from its 2015-2016 accountability year, but does not provide baseline data for each subgroup. Although establishing long-term goals for an extended-year rate is optional, if a State chooses to do so, the ESEA requires the State to identify and describe ambitious long-term goals and measurements of interim progress for all students and each subgroup of students for the extended-year adjusted cohort graduation rate(s), which the statute requires be more rigorous than the long-term goals set for the four-year adjusted cohort graduation rate. Without baseline data, it is unclear whether VDE meets this requirement. • VDE’s long-term goals do not appear to expect improvement for the all students group and certain subgroups and may allow for declines in student performance; as a result, VDE does not meet the statutory requirements.
<p>A.4.iv.a: Academic Achievement Indicator</p>	<ul style="list-style-type: none"> • The ESEA requires a State to measure and describe in its State plan an Academic Achievement indicator that is based only on grade-level proficiency on the annual statewide reading/language arts and mathematics assessments. VDE indicates that, rather than

	<p>measuring only the percent of students achieving grade-level proficiency on the annual statewide reading/language arts and mathematics assessments for the assessment year for which accountability determinations are being made, VDE weights the performance of a student who is proficient or above differently based on the student's prior performance (i.e., counts a student twice if the student did not score proficient the previous year but scores proficient in the current year) and counts as proficient students who show a specified level of growth but do not score at the proficient level. Because VDE does not describe how it calculates the academic achievement indicator based on only proficiency on the annual statewide reading/language arts and mathematics assessments, it is unclear whether VDE meets the statutory requirements.</p> <ul style="list-style-type: none">• VDE proposes including science in the Academic Achievement indicator. For the Academic Achievement indicator required under ESEA section 1111(c)(4)(B)(i)(I), a State may include only proficiency on the annual assessments required under ESEA subsection (b)(2)(B)(v)(I) (i.e., reading/language arts and mathematics); VDE may include performance on science or assessments other than those required under ESEA subsection (b)(2)(B)(v)(I) in the indicator for public elementary and secondary schools that are not high schools required under ESEA section 1111(c)(4)(B)(ii) (i.e., the Other Academic indicator) for elementary and secondary schools that are not high schools or in the School Quality or Student Success indicator for any schools, including high schools.• ESEA section 1111(c)(4)(E)(ii) requires a State to calculate the Academic Achievement indicator by including in the denominator the greater of 95 percent of all students (or 95 percent of all students in a subgroup) or the number of students participating in the assessments.<ul style="list-style-type: none">○ VDE does not describe how its Academic Achievement indicator measures the performance of at least 95 percent of all students and 95 percent of all students in each subgroup for grades 3 through 8.○ VDE does not describe how the indicator measures the performance of at least 95 percent of all students and 95 percent of all students in each subgroup for each of the high school mathematics assessments VDE includes in the indicator (e.g., Algebra I, Geometry, or Algebra II). The Academic Achievement indicator may only include the assessments the State uses to meet the requirements in ESEA section 1111(b)(2)(B)(v)(I), each of which must be administered to all students in every public school in the State for the grades in which it is administered (e.g., high school).
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<p>A.4.iv.b: Other Academic Indicator for Elementary and Secondary Schools that are Not High Schools</p>	<ul style="list-style-type: none"> • VDE identifies as its Other Academic Indicator for Elementary and Secondary Schools that are Not High Schools (i.e., Other Academic Indicator) an indicator that examines the performance of students who did not pass the State’s reading/language arts or mathematics assessment in the prior year. The ESEA requires a State to measure and describe an Other Academic indicator for all students. Because VDE proposes an indicator that looks only at the performance of students who were previously not proficient, VDE has not met the statutory requirements. • In addition, because VDE does not clearly describe how it will measure growth based on the “alternative Virginia Board of Education-approved growth measure,” or how such measure meets the requirement for a “statewide” indicator, it is unclear whether VDE meets the statutory requirements.
<p>A.4.iv.c: Graduation Rate Indicator</p>	<ul style="list-style-type: none"> • The ESEA requires that the Graduation Rate indicator be based on the four-year adjusted cohort graduation rate. For its graduation rate indicator, VDE indicates that it will use a measure it calls the Federal Graduation Indicator (FGI), but it is not clear whether VDE will calculate the FGI consistent with section 8101(25) of the ESEA, which defines the four-year adjusted cohort graduation rate. For example, VDE refers to “accounting for students who are dropouts and transfers” in its graduation rate calculation, without a clear indication that the denominator is adjusted for transfers but not dropouts. As a result, it is unclear whether VDE meets the statutory requirements. • The ESEA requires an SEA to describe its Graduation Rate indicator. Because VDE does not describe how the four-year adjusted cohort graduation rate is combined with the five- and six-year rates for the indicator, VDE has not fully described its Graduation Rate indicator.
<p>A.4.iv.d: Progress in Achieving English Language Proficiency Indicator</p>	<p>The ESEA requires that each State establish and describe a Progress in Achieving English Language Proficiency indicator that is measured at the school level. VDE describes how it will measure progress in achieving English language proficiency at the student level. However, because VDE does not describe how that information is combined to create a distinct accountability measure for each school in the State, it has not fully described its Progress in Achieving English Language Proficiency indicator.</p>
<p>A.4.iv.e: School Quality or Student Success Indicator(s)</p>	<p>The ESEA requires that each School Quality or Student Success indicator used by a State allow for meaningful differentiation in school performance; be valid, reliable, and comparable; and be used statewide in all schools. VDE proposes using chronic absenteeism as its School Quality or Student Success indicator. Although it states, “Rates of chronic absenteeism in Virginia’s public schools vary widely,” VDE does not address whether the indicator allows for meaningful differentiation.</p>

	<p>As a result, it is unclear whether VDE meets the statutory requirements.</p>
<p>A.4.v.a: State’s System of Annual Meaningful Differentiation</p>	<p>The ESEA requires a State to establish and describe in its State plan a system of annual meaningful differentiation, including a description of how the system is based on all indicators, for all students and each subgroup of students. VDE’s State plan does not describe how each indicator is calculated separately and how all indicators are combined to annually meaningfully differentiate among all public schools in the State. Because VDE describes the calculation of a “combined rate” that does not include the performance of all students on every indicator, the State has not described how its system of annual meaningful differentiation is based on all indicators in the State’s accountability system and includes the performance of all students and each subgroup of students on each of the indicators. As a result, it is unclear whether VDE meets the statutory requirements.</p>
<p>A.4.v.b: Weighting of Indicators</p>	<p>The ESEA requires a State to describe the weighting of each indicator in its system of annual meaningful differentiation, including:</p> <ul style="list-style-type: none"> • How the Academic Achievement, Other Academic for elementary and secondary schools that are not high schools, Graduation Rate for high schools, and Progress in Achieving English Language Proficiency indicators each receive substantial weight individually; and • How the Academic Achievement, Other Academic for elementary and secondary schools that are not high schools, Graduation Rate for high schools, and Progress in Achieving English Language Proficiency indicators receive, in the aggregate, much greater weight than the School Quality or Student Success indicator(s), in the aggregate. <p>VDE does not describe the weighting of each indicator in its system of annual meaningful differentiation, nor does it describe how the weighting is adjusted for schools for which an indicator cannot be calculated (such as when the minimum n size is not met). Therefore, it is unclear whether VDE meets the statutory requirements.</p>
<p>A.4.v.c: If Applicable, Different Methodology for Annual Meaningful Differentiation</p>	<p>VDE indicates that it will consider alternative methodologies for annual meaningful differentiation for schools with special populations, but does not describe those methodologies or define the schools to which they would apply. The ESEA requires a State to include all public schools in its system for annual meaningful differentiation and to describe that system in its State plan. Because VDE does not describe the different methodology or methodologies it will use for annual meaningful differentiation of schools with special populations, describe how the methodology or methodologies will be used to identify such schools for comprehensive or targeted support and improvement, or explain how the methodology or methodologies will be limited to schools for which an accountability determination cannot be made, it is unclear whether</p>

<p>A.4.vi.a Comprehensive Support and Improvement Schools— Lowest Performing</p>	<p>VDE meets the statutory requirements.</p> <ul style="list-style-type: none"> • The ESEA requires an SEA to identify for comprehensive support and improvement the lowest-performing five percent of all schools receiving Title I, Part A funds in the State, based on a system of annual meaningful differentiation that includes each required indicator in the State’s accountability system. VDE outlines in its State plan that it will identify the lowest-performing five percent of Title I schools based on a methodology that considers each student’s best performance on the Academic Achievement, Other Academic, or Progress in Achieving English Language Proficiency indicator as part of VDE’s “combined rate,” rather than considering all students’ performance on all of the separate indicators. In addition, VDE considers the School Quality or Student Success indicator only “[i]n the event of a tie ranking,” and appears to not consider its Graduation Rate indicator at all. Because VDE describes a methodology to identify the lowest-performing five percent of Title I schools that is not based on performance on each indicator in its accountability system, VDE has not met the statutory requirements. • VDE proposes to exempt from identification as among the lowest-performing five percent of Title I schools those schools that reduce the failure rate on the State assessments from the previous year by ten percent. The ESEA requires that a State identify not less than the lowest-performing five percent of schools receiving Title I, Part A funds in the State using its system of annual meaningful differentiation. Because VDE is proposing to use a measure that is not part of its system of annual meaningful differentiation to identify schools, VDE has not met the statutory requirements. • The ESEA requires a State to describe its methodology to identify schools for comprehensive support and improvement. VDE indicates that in ranking schools it will consider whether the schools meet measurements of interim progress in either the current/most recent year or by using a three year average but does not clarify how it will determine which approach to use. Therefore, it is unclear whether VDE meets the statutory requirements.
<p>A.4.vi.e: Targeted Support and Improvement Schools— “Consistently Underperforming” Subgroups</p>	<ul style="list-style-type: none"> • VDE proposes to identify schools with one or more “consistently underperforming” subgroups of students from among schools identified for additional targeted support, rather than from among all schools. The ESEA requires a State to describe a methodology for identifying all schools with one or more consistently underperforming subgroups and does not permit identification of only a subset of those schools. Therefore, it is unclear whether VDE meets the statutory requirements. VDE does not describe its methodology to identify schools with one or more “consistently underperforming” subgroups of students with regard to: the

	<p>VDE's definition of “consistently underperforming,” how the methodology is based on all indicators, the number of years over which a subgroup must underperform to meet the definition of “consistently underperforming,” and how VDE calculates reducing the failure rate. The ESEA requires an SEA to describe a methodology for determining which schools require targeted support and improvement based on having one or more consistently underperforming subgroups, which must be based on all indicators in the statewide system of annual meaningful differentiation. Accordingly, it is unclear whether VDE meets the statutory requirements.</p>
<p>A.4.vi.f: Targeted Support and Improvement Schools— Additional Targeted Support</p>	<ul style="list-style-type: none"> • The ESEA requires a State to establish and describe a methodology to identify schools in which the performance of any subgroup of students, on its own, would lead to identification under ESEA section 1111(c)(4)(D)(i)(I) using the State’s methodology under ESEA section 1111(c)(4)(D) (Additional Targeted Support schools) based on all indicators in its accountability system under the ESEA. Although VDE proposes a methodology to identify Additional Targeted Support schools that incorporates the methodology that is used to identify the State’s lowest-performing five percent of Title I schools for comprehensive support and improvement, for the reasons discussed above (see row above for A.4.vi.a Comprehensive Support and Improvement Schools—Lowest Performing), it is not based on all indicators in VDE’s accountability system under the ESEA. Therefore, it is unclear whether VDE meets this requirement. • VDE proposes to exempt from identification for additional targeted support those schools that have reduced the failure rate on the State assessments by ten percent from the previous year. The ESEA requires that a State identify Additional Targeted Support schools using its system of annual meaningful differentiation. Because VDE is proposing to use a measure that is not part of its system of annual meaningful differentiation to identify schools, VDE has not met the statutory requirements.
<p>A.4.viii.a: Exit Criteria for Comprehensive Support and Improvement Schools</p>	<ul style="list-style-type: none"> • VDE’s exit criteria for schools identified for comprehensive support and improvement based on being among the lowest-performing five percent of Title I schools are normative and, therefore, do not necessarily ensure continued progress to improve student academic achievement and school success in the State. The ESEA requires a State to establish and describe statewide exit criteria for schools identified for comprehensive support and improvement that ensure continued progress to improve student academic achievement and school success in the State. Because VDE describes exit criteria that do not necessarily ensure continued progress to improve student academic achievement and school success in

	<p>the State, VDE has not met the statutory requirements.</p> <ul style="list-style-type: none"> • The ESEA requires a State to establish and describe exit criteria that ensure continued progress to improve student academic achievement and school success in the State, including the State-determined number of years over which such schools must satisfy the exit criteria, which may not exceed four years, consistent with ESEA section 1111(d)(3)(A)(i)(I). Because VDE does not describe the number of years within which schools identified for comprehensive support and improvement based on having low graduation rates are expected to meet exit criteria, it is unclear whether VDE meets the statutory requirements. • The ESEA requires a State to establish and describe exit criteria that ensure continued progress to improve student academic achievement and school success in the State, including the State-determined number of years over which such schools must satisfy the exit criteria, which may not exceed four years, consistent with ESEA section 1111(d)(3)(A)(i)(I). Because VDE does not describe exit criteria for schools identified for comprehensive support and improvement schools based on having been previously identified for additional targeted support and not exiting such status, it is unclear whether VDE meets the statutory requirements.
<p>A.4.viii.b: Exit Criteria for Schools Receiving Additional Targeted Support</p>	<p>In its State plan, VDE indicates that its statewide exit criteria for schools that receive additional targeted support require such schools to meet the measurements of interim progress, but does not include the number of years over which these schools are expected to meet such measurements in order to exit. The ESEA requires a State to establish statewide exit criteria for schools that receive additional targeted support and to describe such exit criteria in its State plan, including the number of years of which schools are expected to meet such criteria. Therefore, it is unclear whether VDE meets the statutory requirements.</p>
<p>A.5: Disproportionate Rates of Access to Educators</p>	<ul style="list-style-type: none"> • Although VDE presents data that consider certain rates of student access to educators with various qualifications, VDE does not specifically address ineffective teachers or schools assisted under Title I, Part A. The ESEA requires a State to describe the extent, if any, that low-income and minority children enrolled in schools assisted under Title I, Part A are served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers. • While VDE includes some discussion regarding how it collects data generally related to teacher qualifications and rates of student access to educators with various qualifications, VDE does not clearly describe the measures that it will use to evaluate and publicly report its progress with respect to how low-income and minority children are not served at disproportionate rates by ineffective, out-of-field, and inexperienced teachers. The ESEA

	also requires an SEA to describe the measures that it will use to evaluate and publicly report its progress with respect to how low-income and minority children are not served at disproportionate rates by ineffective, out-of-field, and inexperienced teachers.
Title I, Part C: Education of Migratory Children	
B.1: Supporting Needs of Migratory Children	VDE describes how in planning, implementing, and evaluating the Migrant Education Program, it will address the unique educational needs of migratory children, including preschool migratory children, through measurable program objectives and outcomes. However, the ESEA requires that a State also describe how it will address the unique educational needs of migratory children who have dropped out of school, through measurable program objectives and outcomes.
Title I, Part D: Prevention and Intervention Programs for Children and Youth Who Are Neglected, Delinquent, or At-Risk	
C.1: Transitions Between Correctional Facilities and Local Programs	Although VDE includes a plan for assisting in the transition of children and youth from correctional facilities to locally operated programs, it does not include a plan for assisting in the transition of children and youth <i>between</i> locally operated programs and correctional facilities (i.e., the transition from correctional facilities to locally operated programs as well as the transition from locally operated programs to correctional facilities). The ESEA requires a plan for assisting in the transition of children and youth between correctional facilities and locally operated programs.
Title II, Part A: Supporting Effective Instruction	
D.5: Data and Consultation	Although VDE describes several ways it will use data to continually update and improve the activities supported under Title II, Part A, VDE does not describe how it will use ongoing consultation to continually update and improve the activities supported under Title II, Part A. The ESEA requires that an SEA describe how it will use ongoing consultation to continually update and improve the activities supported under Title II, Part A. Additionally, the ESEA requires a State to describe ongoing consultation for all required stakeholders consistent with ESEA section 2101(d)(3), which includes teachers, principals, other school leaders, paraprofessionals (including organizations representing such individuals), specialized instructional support personnel, charter school leaders (in a State that has charter schools), parents, community partners, and other organizations or partners with relevant and demonstrated expertise in programs and activities designed to meet the purpose of Title II. Therefore, it is unclear whether VDE meets the statutory requirements.
Title III, Part A, Subpart 1: English Language Acquisition and Language Enhancement	
E.1: Entrance and Exit Procedures	VDE indicates that it requires an assurance from LEAs that receive Title III, Part A funds that all

	<p>students who may be English learners are assessed for such status within 30 days of enrollment in a school in the State but does not discuss similar requirements for LEAs that do not receive Title III, Part A funds. The ESSA requires an SEA provide an assurance that all students who may be English learners are assessed for such status within 30 days of enrollment in a school in the State. Because VDE does not assure that all students who may be English learners in the State will be assessed for such status within 30 days of enrollment, it is unclear whether VDE meets the statutory requirements.</p>
<p>Title IV, Part A: Student Support and Academic Enrichment Grants</p>	
<p>F.1: Use of Funds</p>	<p>VDE provides a description of State-level activities, but limits it by indicating that implementation of activities “will be contingent upon the amount of the state’s award.” Now that VDE knows its allocation, consistent with the ESEA requirement, it must clarify how it will use its funds for State-level activities.</p>
<p>Education for Homeless Children and Youths Program, McKinney-Vento Homeless Assistance Act, Title VII, Subtitle B</p>	
<p>I.6: Policies to Remove Barriers</p>	<p>While VDE demonstrates that the SEA and LEAs in the State have developed policies to remove barriers to the identification of homeless children and youth, VDE does not demonstrate that the SEA and LEAs shall review and revise these policies to remove barriers to the identification, enrollment, and retention of homeless children and youth. The McKinney-Vento Act requires the State to demonstrate that the SEA and LEAs in the State have developed, and shall review and revise, policies to remove barriers to the identification of homeless children and youth, and the enrollment and retention of homeless children and youth in the State, including barriers to enrollment and retention due to outstanding fees or fines, or absences.</p>
<p>I.7: Assistance from Counselors</p>	<p>While VDE describes that the State Coordinator has presented at the State’s school counselor conference and that local liaisons receive training to verify unaccompanied homeless youth for FAFSA purposes, VDE does not describe how youth will receive assistance from counselors to advise, prepare, and improve the readiness of such youths for college. The McKinney-Vento Act requires a State to describe how homeless youths will receive assistance from counselors to advise such youths, and prepare and improve the readiness of such youths for college.</p>