

STATE PLAN

Peer Review Criteria and Notes Form for the McKinney-Vento EHCY Program

State Name: Arkansas



U.S. Department of Education
September 2017

Background

Peer reviewers will apply their professional judgment and experiences when responding to the questions in response to the criteria below. Consistent with section 1111(a)(4)(C) of the Elementary and Secondary Education Act, peer reviewers will conduct an objective review of State plans in their totality and out of respect for State and local judgments, with the goal of supporting State- and local-led innovation and providing objective feedback on the technical, educational, and overall quality of a State plan, including the validity and reliability of each element of the plan. Reviewer responses to the questions inform the written determination of the Secretary regarding the State plan.

Role of the Peer Reviewers

- Each peer reviewer will independently review a consolidated State plan in accordance to the criteria for Title VII, Subtitle B of the McKinney-Vento Homeless Assistance Act's Education for Homeless Children and Youth Program (EHCY). Each reviewer will record their responses to the questions, will note where changes may be necessary for an SEA to fully address statutory and regulatory requirements, and may also present suggestions for improving the plan or to highlight best practices. Each peer will create individual recommendations to guide the remote review. These are submitted to the Department but will not be shared with the State.
- A panel of peer reviewers will meet remotely to discuss each SEA's plan. The panel of peer reviewers will generate one set of peer review notes that reflects their collective review and evaluation of the SEA's State plan, but the panel is not required to reach consensus. The notes should reflect all reviewer perspectives on each item.

After the peer review is completed, each SEA will receive the final peer review notes that include the peer reviewers' responses to the questions and any recommendations to improve the SEA's State plan in the sections that the peers reviewed. The peer review notes serve two purposes: 1) they constitute the official record of the peer review panel's responses to questions regarding how an SEA's State plan addresses the statutory and regulatory requirements; and 2) they provide technical assistance to the SEA on how to improve its plan. The peer review notes also serve as recommendations to the Secretary to determine what, if any, additional information to request from the SEA. Taking into consideration the peer reviewers' recommendations, the Department will provide feedback to each SEA that outlines the areas the SEA must address, if any, prior to the Secretary's approving its State plan. If a plan cannot be approved, the Department will offer the State an opportunity to revise and resubmit its plan and have a hearing, consistent with ESEA section 8451.

Consistent with ESEA section 1111(a)(5), the Department will make publicly available all peer review guidance, training, and final peer panel notes. The names of peer reviewers will be made publicly available at the completion of the review of all State Plans, though the peer reviewers for any individual State will not be made available.

How to Use This Document

The reviewer criteria is intended to 1) support States as they develop their consolidated State plans, and 2) inform peer review teams as they evaluate each State plan. This document outlines required elements in order for an SEA to fully address the applicable statutory and regulatory requirements. If an SEA has provided insufficient information for peer reviewers to determine whether any question is fully addressed, peer reviewers should indicate that the SEA has not fully addressed that requirement and identify what additional information or clarification may be needed.

Instructions

Each peer reviewer should include individual review notes in the space provided below each State plan requirement. For each State plan requirement, a peer reviewer will provide:

- Peer Analysis: Describe the peer reviewer's justification for why an SEA did or did not meet the requirements;
- Strengths: Summarize strengths of the SEA's response to the State plan requirement;
- Limitations: Summarize the limitations of an SEA's response to the State plan requirement, including issues, lack of clarity, and possible technical assistance suggestions;
- Assessment: Determine if the SEA met the State plan requirement (indicated by Yes/No); and
 - If the peer reviewer indicates 'no' above, the peer must describe the specific information or clarification that a State must provide in order to meet the requirement.

The peer reviewer notes should address all of the required elements of each State plan requirement in this document, but do not need to address each element individually (*i.e.*, the peer notes should holistically look at I.5 the Strategies to Address Other Problems, incorporating each of the five identified items in this element but do not need to individually respond to each item).

SECTION I: EDUCATION FOR HOMELESS CHILDREN AND YOUTH PROGRAM, MCKINNEY-VENTO HOMELESS ASSISTANCE ACT, TITLE VII, SUBTITLE B

I.1: Student Identification (722(g)(1)(B) of the McKinney-Vento Act)

- **Does the SEA describe the procedures it will use to identify homeless children and youth in the State and to assess their needs?**

	<i>Peer Response</i>
<i>Peer Analysis</i>	The peer reviewers observed that the SEA had established policies and procedures to identify homeless students and assess their needs, and that the State Residency Form used by LEAs will assist in ensuring that all LEAs across the State have a uniform method for student identification.
<i>Strengths</i>	Strengths referenced by the peer reviewers include the statewide adoption of a residency form and the training provided to LEAs on the identification of homeless children and youth. The peer reviewers also noted the variety of key stakeholders that are included in the needs assessment process for homeless children and youth, including special education, speech pathology, school nurses and ESOL staff.
<i>Limitations</i>	It was noted that the State’s plan is unclear regarding how often the SEA provides training opportunities for LEA staff, monitors the placement of posters or adherence of LEAs to federal definitions, and measures the effectiveness of the training provided. Additionally, there was no discussion of how LEAs will obtain the posters and educational rights brochures, or data presented regarding which aspects of the identification issue, if any, are considered a problem in the State.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3) Reviewers
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

I.2: Dispute Resolution (722(g)(1)(C) of the McKinney-Vento Act)

- **Does the SEA describe procedures for the prompt resolution of disputes regarding the educational placement of homeless children and youth?**

	<i>Peer Response</i>
<i>Peer Analysis</i>	The peer reviewers observed that the State plan referenced a formal dispute resolution protocol, but did not describe the process. The reviewers noted that the State plan referenced a sample of the Homeless Dispute Resolution in Appendix A. However, the dispute outlined in Appendix A relates to students with special education needs, and accessing special education services.
<i>Strengths</i>	The peer reviewers identified strengths in the State plan’s reference to the dispute resolution procedure and the processing of disputes in a timely manner.
<i>Limitations</i>	It was noted that the referenced dispute resolution procedure was not provided in the State plan. Therefore, the peer reviewers could not verify compliance with the requirements for dispute resolution.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> No (3) Reviewers
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The peer reviewers indicated that the State plan would be strengthened by the inclusion of specific information on the State dispute procedure, including responsibilities, timelines, and information to demonstrate that the process is accessible, fair, and timely.

I.3: Support for School Personnel (722(g)(1)(D) of the McKinney-Vento Act)

- **Does the SEA describe programs for school personnel (including the LEA liaisons for homeless children and youth, principals and other school leaders, attendance officers, teachers, enrollment personnel, and specialized instructional support personnel) to heighten the awareness of such school personnel of the specific needs of homeless children and youth, including such children and youth who are runaway and homeless youths?**

<i>Peer Response</i>	
<i>Peer Analysis</i>	The peer reviewers observed that the State plan described training provided to a variety of stakeholders to increase their awareness of the needs of homeless children and youth. They also observed that more description is needed regarding how the various training mechanisms will be employed and the role of the liaison in providing training.
<i>Strengths</i>	The peer reviewers saw strengths in the State plan’s description of the differentiated training, including face-to-face meetings, webinars and conferences.
<i>Limitations</i>	Peer reviewers noted that the State plan referenced various stakeholder groups being invited to the offered training, but no verification of those groups actual attendance is mentioned. Reviewers also noted that the SEA did not describe any variation in content for different stakeholder groups and did not discuss expectations, if any, for liaisons to provide local training (and how they will be supported to do so). Finally, reviewers shared that no data are cited to prioritize stakeholder groups for participation or to prioritize topics to emphasize in the training.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> No (3) Reviewers
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The peer reviewers indicated that the State’s plan could be strengthened by providing additional details on how the training will be made available to stakeholders and how it will be targeted to the areas and groups of greatest priority. Additionally, reviewers noted that the plan could be strengthened by describing a mechanism to document training participation, especially by liaisons, and to include training as an element examined in LEA monitoring.

I.4: Access to Services (722(g)(1)(F) of the McKinney-Vento Act)

- **Does the SEA describe procedures that ensure that homeless children have access to public preschool programs, administered by the SEA or LEA, as provided to other children?**

	<i>Peer Response</i>
<i>Peer Analysis</i>	The peer reviewers observed that the State plan referenced working with multiple agencies to ensure that homeless children have access to public preschool programs. However, they also noted that more detail is needed, such as what activities are expected to result from the various collaborations and how the training will be targeted to locales or audiences most in need of assistance in this area.
<i>Strengths</i>	The peer reviewers identified strengths in the State plan’s description of collaboration, noting that the State Coordinator works with the Division of Early Childhood Education to ensure access to preschool programs, that LEA liaisons have a referral process for local early childhood programming, and that the SEA trains LEAs on accessing public preschool.
<i>Limitations</i>	It was noted that the State’s plan was unclear regarding how the SEA monitors the access of homeless children to preschool programs and does not reference the expected outcomes of the collaborations.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1) Reviewer <input checked="" type="checkbox"/> No (2) Reviewers
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	It was noted that the plan could be strengthened by articulating a broader set of expected activities to be used to foster appropriate identification and enrollment of preschool children, with further detail around the target audience(s), how barriers will be removed and the outcomes expected from the collaboration with the early childhood division.

- **Does the SEA describe procedures that ensure that homeless youth and youth separated from public schools are identified and accorded equal access to appropriate secondary education and support services, including by identifying and removing barriers that prevent youth described in this clause from receiving appropriate credit for full or partial coursework satisfactorily completed while attending a prior school, in accordance with State, local, and school policies?**

	<i>Peer Response</i>
<i>Peer Analysis</i>	The peer reviewers observed that the State’s plan included training to ensure that homeless youth and youth separated from school are identified, and that the SEA is developing guidance and procedures to ensure credit accrual. While it was noted that the plan could be more specific in describing how this will be done and in the expectations for outreach and identification that will be examined in local monitoring, the reviewers observed that the State’s plan outlined processes and procedures both in place and in development that will afford homeless students the removal of any barriers to receiving appropriate credit for full or partial coursework.
<i>Strengths</i>	The peer reviewers identified strengths in the State plan’s description of collaboration with Title I, Part A stakeholders to provide access to credit recovery, online courses, summer school and tutoring for homeless youth. Additionally, it was noted that the SEA is in the process of gaining formal approval of State guidance for the consistent granting of full or partial credit for coursework satisfactorily completed in prior schools by the Arkansas State Board of Education. Finally, the reviewers referenced outreach to unaccompanied homeless youth as part of the monitoring process, and the SEA training provided to LEAs, as particular strengths.
<i>Limitations</i>	It was noted that the State plan referenced the potential for formal guidance and related training on credit accrual, but that these supports are not currently in place. Reviewers also noted that no data are cited as to the extent to which identification or access to secondary education and services by youth are problems and, if so, what aspects need to be addressed.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3) Reviewers
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	.

- **Does the SEA describe procedures that ensure that homeless children and youth who meet the relevant eligibility criteria do not face barriers to accessing academic and extracurricular activities, including magnet school, summer school, career and technical education, advanced placement, online learning, and charter school programs, if such programs are available at the State and local levels?**

	<i>Peer Response</i>
<i>Peer Analysis</i>	The peer reviewers observed that the State plan did not fully articulate how the SEA will address this requirement, particularly the academic program components. Reviewers noted that statutory training will be provided by the State Coordinator, but the plan did not provide a discussion of current procedures or of future planning to address the priority areas of this issue was included.
<i>Strengths</i>	The peer reviewers saw strengths in the State’s plan to provide training to LEAs on the statutory requirements, in the provision of sample forms to LEAs to assist homeless parents or unaccompanied homeless youth in obtaining enrollment documents, and in the collaboration with the State Athletic Association to develop specific procedures to ensure eligibility for athletics.
<i>Limitations</i>	It was noted that the State’s plan mentions each of the categories in this indicator. However, the only category with additional description regarding the removal of barriers is athletics. Reviewers also noted that the plan did not identify problem areas or mechanisms to review/update current policies or procedures, and did not mention transportation.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> No (3 Reviewers)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The peer reviewers indicated that the State plan could be strengthened by specifically addressing how the SEA will review and update State and local policies and procedures impacting access to, and participation in, each of the listed academic programs – magnet school, summer school, career and technical education, advanced placement, online learning and charter school programs.

I.5: Strategies to Address Other Problems (722(g)(1)(H) of the McKinney-Vento Act)

- **Does the SEA provide strategies to address other problems with respect to the education of homeless children and youth, including problems resulting from enrollment delays that are caused by—(i) requirements of immunization and other required health records; (ii) residency requirements; (iii) lack of birth certificates, school records, or other documentation; (iv) guardianship issues; or (v) uniform or dress code requirements?**

	<i>Peer Response</i>
<i>Peer Analysis</i>	The peer reviewers noted that the SEA uses multiple avenues to address enrollment delays caused by lack of records and that the narrative mentions each of the components listed in the indicator. However, one reviewer also noted that additional detail regarding how LEAs will be assisted in addressing these issues (expanding on the training and technical assistance referenced) would strengthen the plan.
<i>Strengths</i>	Strengths identified by the peer reviewers include the SEA training provided to all LEA liaisons. Reviewers noted that this professional development appears to be specific to the removal of enrollment barriers relating to documentation and the process for liaisons to obtain school records. Additionally, coordination with Title I, Part A to address barriers related to school uniform requirements was identified as a strength.
<i>Limitations</i>	Peer reviewers observed that the narrative lacked detail regarding specific strategies to impact residency requirements and guardianship issues. Additionally, reviewers noted that the plan did not reference monitoring LEA procedures by the SEA.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (2) Reviewers <input checked="" type="checkbox"/> No (1) Reviewer
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	It was noted that the State’s plan could be strengthened with further description of State or local policies and procedures regarding immunization, residency, birth certificates, and guardianship issues, and how these will be documented and monitored. Additionally, it was noted that the plan would benefit from greater detail on how training will be configured (content, delivery, target audiences) to reduce enrollment delays.

I.6: Policies to Remove Barriers (722(g)(1)(I) of the McKinney-Vento Act)

- **Does the SEA 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 schools in the State, including barriers to enrollment and retention due to outstanding fees or fines, or absences?**

	<i>Peer Response</i>
<i>Peer Analysis</i>	The peer reviewers observed that the State’s plan outlined certain steps the SEA has taken to reduce barriers to the identification, enrollment and retention of homeless children and youth, and limit barriers related to outstanding fees, fines and absences, but the plan did not discuss specific policies to address barriers.
<i>Strengths</i>	Strengths in the State’s plan identified by the peer reviewers include SEA monitoring of LEA policies for barriers to enrollment and the training provided by the SEA on McKinney-Vento policies.
<i>Limitations</i>	Peer reviewers noted that while the SEA stated that it will ensure that barriers related to outstanding fees, fines or absences are addressed, the narrative did not include a description of the process for reviewing State policies. Additionally, reviewers could not identify specific monitoring guidelines to ensure compliance.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> No (3) Reviewers
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	Peer reviewers shared that the State’s plan could be strengthened with additional, and more specific, information regarding how State and/or local policies and procedures may be reviewed and revised to address the removal of barriers (this additional information may include timelines, monitoring procedures and the articulation of a process for making update or revisions to State or local policies).

I.7: Assistance from Counselors (722(g)(1)(K))

- **Does the SEA include how youths described in section 725(2) will receive assistance from counselors to advise such youths and prepare and improve the readiness of such youths for college?**

	<i>Peer Response</i>
<i>Peer Analysis</i>	Peer reviewers observed that while the State plan mentioned conference presentations, it would benefit from additional strategies to provide counselors with the information and resources they need to work effectively with homeless youth on college access and readiness issues. Reviewers noted that the plan did not fully address the requirement, but does highlight training the SEA provides to LEAs and school counselors.
<i>Strengths</i>	Peer reviewers identified several strengths in the plan, including SEA training at the annual school counselors' conference, encouraging school counselors to participate in the State homeless conference, and the training that school counselors receive regarding verification of homelessness for financial aid.
<i>Limitations</i>	Peer reviewers noted that the SEA did not describe how the effectiveness of training will be measured and monitored and that conference presentations may not be sufficient to provide the information, resources and support counselors need to work with homeless youth on college access and readiness.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> No (3) Reviewers
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	Peer reviewers noted that the State's plan could be strengthened by describing the kinds of assistance from counselors that homeless students should receive and discussing State and/or local policies that are (or will be) in place to address college readiness. Reviewers indicated that this may include individual reviews and post-secondary planning procedures.