

STATE PLAN

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

State Name: Arizona



U.S. Department of Education

June 28, 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;
- Overall Determination: 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 review panel observed that the SEA did not provide details or specifics on procedures for the identification of homeless children and youth. The SEA focused on the role the LEAs played in identification, and the plan had little detail on how LEAs would assess students and families’ needs.
<i>Strengths</i>	The peer review panel observed that the State acknowledged the role of LEAs in identification and indicated there was support provided by NCHE. The plan stated that the LEA would assess the needs of the students and families.
<i>Limitations</i>	The peer review panel observed the SEA had little to no details regarding the procedures on how students and their needs would be identified and assessed. The plan only addressed the LEAs responsibilities in identification whereas the question asked the SEA to describe procedures it would use to identify homeless children and youth. The panel observed there was no evidence of the role the SEA played in identification.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes <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 suggested that the plan would be strengthened if it would address the requirement that the SEA has procedures related to the identification of homeless children and youth, include more details explaining the expectations of how students are to be identified and how their needs should be assessed, and address the tracking of homeless children and youth in a statewide accountability system.

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 review panel observed that the plan had a description, though brief, of the SEA's process for prompt resolution of disputes, but it did not provide specific enough details regarding the procedures for a prompt dispute resolution.
<i>Strengths</i>	The peer review panel noted that the SEA had a clear timeline to assure prompt resolution of disputes of 14 days and had established a process for dispute resolution at the State level. The State described what the dispute resolution may be used for, as well as addressed new eligibility requirements under ESSA.
<i>Limitations</i>	<p>The peer review panel observed the SEA's response lacked sufficient detail information about the procedures. Even though the plan described a 14 day time period, it did not mention if it was for the LEA or SEA or both. Also, the plan did not indicate how the SEA would monitor LEAs adoption of the dispute resolution process.</p> <p>The peer review panel recommended that a more detailed description of the actual dispute process be included or a link to the SEA's established process.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes <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 suggested that the plan would be strengthened if it would provide a detailed description of the SEA's prompt dispute resolution process, provide more specifics on how the LEA should interact with the students, families and the SEA during the dispute process, and provide more specifics on when the 14 day timeframe was to be put in place (LEA or SEA or both).

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 review panel observed that the SEA’s response referenced the requirement that staff be trained, however, it did not reflect the depth of technical assistance that this would require. Also, the plan did not describe details and specifics on how the SEA would attract school personnel to attend the meetings. Furthermore, the plan did not address any specifics on how the SEA would heighten the awareness of the positions mentioned in the question.
<i>Strengths</i>	The peer review panel noted that the plan indicated how trainings would occur (in-person, meetings, webinars, and conferences), and that it had a goal for training all staff.
<i>Limitations</i>	The peer review panel observed that training all staff would require a more robust process and support system than what was described in the plan. The SEA did not provide details on how these trainings would heighten the awareness of school personnel, and it did not address any sort of accountability to ensure that school personnel, as mentioned, would receive such awareness activities. The plan did not address runaway and homeless youth.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes <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 suggested that the plan would be strengthened if it would provide a description of how the various stakeholders would be informed about the specific needs of homeless children and youth, as well as runaway and homeless youth. Also, the plan should provide more details on specific types of trainings that will be provided to attract the various groups of stakeholders in the question, provide more details on how LEAs will heighten the awareness of all staff, and specify the different modalities and collaborations that will be required to train all staff.

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 review panel observed the plan acknowledged the need for future collaboration; however, the State did not have a public preschool program except for its special education early education program. The description did not address the SEA's procedures to ensure that homeless children had access to public preschool programs. The State did not have public preschool programs that were not a federal requirement, and there was limited information on how the State homeless program worked with the special education department to ensure access to special education preschool programs.
<i>Strengths</i>	The peer review panel noted that the SEA indicated that it would strengthen collaborations with the Early Childhood Education unit for training and technical assistance. Also, homeless preschool students had the same access to special education preschool programs as non-homeless students.
<i>Limitations</i>	While the State may not have statewide preschool, it did offer Head Start throughout Arizona. In some cases, these Head Start programs appeared to be administered by the school districts, indicating the McKinney-Vento provisions would apply. Furthermore, the plan indicated that there were no preschool programs outside of the special education realm, and it did not address any sort of accountability to track homeless students enrolled in special education early education. Also, there was no mention of how the SEA would ensure that homeless children would have access to preschool programs. The peer review panel recommended that the SEA describe its procedures to ensure access, as stated in the question.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes <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 suggested that the plan would be strengthened if it would describe how the State Coordinator and the state special education programs work to make sure that students with special needs who are homeless receive access to the appropriate programs. Also, the peer reviewers suggested that the plan describe the procedures that the SEA would implement to ensure that children experiencing homelessness have access to public preschool programs, including Head Start.

- **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 review panel observed that the plan provided limited details and specifics on the SEA’s procedures for removing barriers and assuring that homeless youth do not face barriers in credit accrual.
<i>Strengths</i>	The peer review panel noted that the SEA worked with LEAs to develop local policies related to assuring students received appropriate full credit or partial credit. The plan indicated that the SEA had a common statewide course framework to assist homeless youth with receiving credit accrual for completed coursework; however, it did not describe what the framework entailed.
<i>Limitations</i>	The peer review panel observed that the plan provided no specifics on how barriers were to be removed, how partial or full credit would be awarded for mobile homeless students, or how youth separated from public school would be identified.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes <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 suggested that the plan would be strengthened if it would provide specific examples of how LEAs are trained to remove barriers and how districts should provide partial or full credit for work completed, as well as provide examples of support services. Furthermore, the peer reviewers observed that the plan should address how youth separated from public schools are identified and accorded equal access to appropriate secondary education and support services, and describe how the SEA Office of Homeless Education works collaboratively with LEAs to develop policies or provide examples of these policies. The peer reviewers also recommended that the plan provide a description of collaborative efforts at the State level, local procedures for awarding credit, and how the field receives training or technical assistance, and provide specifics on data requirements and how it supports the SEA’s procedures.

- **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 review panel observed that the plan referenced technical assistance, but it did not provide detailed and specific information on the actual procedures for ensuring barriers to academic and extracurricular activities were removed.
<i>Strengths</i>	The peer review panel noted the SEA referenced technical assistance and trainings that were offered. Also, the plan stated that districts would assure that they were removing barriers in all of the areas discussed in the question.
<i>Limitations</i>	The peer review panel observed the SEA had no specifics on how the barriers should or would be removed. The plan restated the question with the addition of the SEA offering ongoing training and technical assistance. Also, the plan did not include a detailed description of procedures and assurances. The peer review panel recommended that the SEA provide more information on the State context and further details on the types and frequency of the trainings and technical assistance opportunities.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes <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 suggested that the plan would be strengthened if it would provide detailed procedures to ensure homeless children and youth can access all programs indicated in the requirement, as well as clarify what programs and activities are offered in the State. Additionally, the peer reviewers observed the plan could clarify the specific supports the SEA provides, and its procedures for technical assistance, and provide a description of any elements included in the SEA's monitoring or grant application which specifically address these barriers. Lastly, the peer reviewers recommended that the plan include a description of the coordination of funds, specifically how the SEA might assist LEAs in leveraging resources to remove barriers, and a discussion of assurances collected in the consolidated application.

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 review panel observed that the plan restated the requirement and offered limited strategies that the SEA would provide to remove barriers related to enrollment delays.
<i>Strengths</i>	The peer review panel noted that the plan indicated a review of the State education code and provisions related to this requirement under ESSA. Also, the peers saw that the SEA stated that it would make sure all these barriers were removed and that it would provide technical assistance and training.
<i>Limitations</i>	The peer review panel observed that the plan restated the requirement with partial evidence provided. The plan referenced training or technical assistance, but it did not define the types of trainings offered, the frequency, nor the audience for these trainings. Also, there was no information on the requirement that LEAs have a policy or procedure in place, nor did it provide specificity on the applicable state code to support this requirement.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes <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 suggested that the plan would be strengthened if it would provide more detailed strategies that address the problems of enrollment delays due to the various issues stated in the requirement, and provide more specifics on how each of the various issues in the question would be fully implemented.

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 review panel observed that the plan provided limited information on how the State supported efforts to remove barriers in developing, reviewing, and revising policies.
<i>Strengths</i>	The peer review panel noted that the plan provided specific action steps that the SEA utilized for providing model, draft policies for LEAs. The plan referenced the monitoring of LEA’s policies to ensure that barriers were removed regarding outstanding fees or fines, or absences.
<i>Limitations</i>	The peer review panel observed that limited information was provided on how the monitoring process helped with removing barriers to enrollment, and it was unclear which barriers the policies addressed.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes <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 suggested that the plan would be strengthened if it would provide examples rather than assurances of policies to help with the removal of barriers to the identification, enrollment and retention of homeless children and youth. Additionally, the panel observed the plan should describe more specific information on the types of draft policies created through collaborations to ensure that they include removing barriers to identification, enrollment and retention. Also, the peer reviewers recommended that the plan provide a further description of how the monitoring process, if applicable, assures compliance with identification, enrollment, and retention, and include how the SEA and LEAs will remove barriers caused from outstanding fees, fines, and absences.

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>	The peer review panel observed that the plan lacked detailed and specific information to address how youth would receive assistance from counselors.
<i>Strengths</i>	The peer review panel noted that the plan stated that districts sign assurances, through the General Statement of Assurance, for LEAs and their counselors to provide assistance to homeless youth.
<i>Limitations</i>	The peer review panel observed the plan did not describe how youth would receive assistance from counselors or how the SEA would monitor such assistance. Additionally, the plan did not reference FAFSA, graduation plans, credit accrual, or any other specific supports which served to improve the college readiness of homeless youth.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes <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 suggested that the plan would be strengthened if it would describe how counselors work with and/or are expected and trained to work with homeless students, and provide detail descriptions addressing how homeless youth will receive college readiness assistance from counselors. Additionally, the peer reviewers recommended that the plan include information on how the LEAs disseminate information to homeless unaccompanied youth on their FAFSA rights, what training counselors or homeless liaisons might receive regarding this assistance, the monitoring process for assurance collected as part of the General Statement of Assurance, and any other existing supports available to homeless youth in meeting this requirement.