

STATE PLAN

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

State Name: Colorado



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 reviewers observed that the State plan described a range of activities to increase identification of homeless children and youth, including how the State coordinator works with district personnel through training to help them identify homeless students, as well as how the State works with various organizations to address the needs of homeless students across the State.
<i>Strengths</i>	The peer reviewers observed the State plan described how the State Coordinator collaborates with multiple Federal programs including Title I, Migrant, Title III and others, and addresses homeless student identification through regional and ongoing training of local school staff. The State plan described how the SEA conducts a needs assessment through focus groups, surveys and interviews with parents and students, and how subgrantees must include a community needs assessment in their application. The State plan also provided a strategies and activities grid with implementation timelines.
<i>Limitations</i>	The peer reviewers noted that while the system needs assessments are strong, the State plan did not describe information about needs assessments for individual students.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3) Reviewers <input type="checkbox"/> No
<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 described a system to address prompt dispute resolution that was currently in place at the State level to address the educational placement of homeless children and youth at both the SEA and LEA level.
<i>Strengths</i>	The peer reviewers observed that the State plan described a formal dispute resolution policy and had it posted on its SEA website in both English and Spanish. The State plan described procedures where SEA-level disputes are reviewed by a committee, and that LEA monitoring included dispute resolution policies. The State plan described the basic steps that were to be taken at the LEA level and encouraged resolution there.
<i>Limitations</i>	The peer reviewers noted that the State plan did not define what it meant when it stated that disputes will be resolved in a timely manner, and that without a timeline for prompt resolution, it was difficult to understand if the procedure described was prompt.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3) Reviewers <input type="checkbox"/> No
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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 multiple opportunities for the targeted school staff to access training on the specific needs of homeless children and youth to heighten their awareness as it relates to this requirement.
<i>Strengths</i>	The peer reviewers observed that the State plan provided in-person and online training opportunities open to all roles within the school and updates training materials annually. The State plan also described ongoing communication from the State Coordinator to local liaisons, as well as training provided to homeless service agencies.
<i>Limitations</i>	The peer reviewers noted that the State plan did not indicate how the SEA would evaluate the effectiveness of the training provided, and did not indicate specifically that heightening awareness of the specific needs of runaway and homeless youth were included in the trainings.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3) Reviewers <input type="checkbox"/> No

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 described procedures to ensure homeless children have access to public preschool programs as provided to other children and described how the SEA ensures this access.
<i>Strengths</i>	The peer reviewers observed that the State plan described procedures that ensure homeless children have access to public preschool programs including reserving spots for highly mobile children. The State plan described how it addresses this requirement through coordination with other agencies and staff, specifically regional Head Start offices, and how the SEA hosts or coordinates multiple trainings and peer-to-peer discussions on early childhood education and access, such as convening mixed groups of local liaisons and early childhood professionals to support increased communication and collaboration.
<i>Limitations</i>	The peer reviewers noted that the State plan’s narrative for this requirement did not include a description of how the access of young homeless children to public preschool programs is monitored, and could have provided more specific information on current procedures.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3) Reviewers <input type="checkbox"/> No
<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 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 plan did not describe procedures that address this requirement for identification, equal access to appropriate secondary education and support services, and the removal of barriers that prevent such students from receiving appropriate credit for full or partial coursework satisfactorily completed while attending a prior school. The peer reviewers observed that while the State plan mentioned programs that homeless students should have access to, it did not provide specifics on how to remove the barriers.
<i>Strengths</i>	The peer reviewers observed that the State plan described how the State Coordinator participates in multiple State and regional advisory boards focused on removing barriers for homeless youth, and that subgrantee proposals may provide plans to support this requirement.
<i>Limitations</i>	The peer reviewers noted that the State plan’s narrative in response to this requirement did not describe procedures to ensure that LEAs remove barriers to providing credit for full or partial coursework.
<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 indicated that the State plan could be strengthened by describing specific procedures to address this requirement. Also, an additional description is needed to describe the type of support and monitoring for LEAs to remove barriers to appropriate credit for coursework satisfactorily completed while attending a prior school.

- **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 described procedures whereby the SEA works with LEAs in the State to ensure that they have a full understanding of enrollment requirements under the McKinney-Vento Act and provide access to eligible students. Also, the State plan ensured that barriers to academic and extracurricular activities were removed but did not provide specifics on how to remove the barriers.
<i>Strengths</i>	The peer reviewers observed that the State plan described procedures for statewide training to local liaisons on full participation in school programs, and the liaisons are in turn expected to disseminate this information to other LEA personnel. The SEA collects and shares model policies and procedures that help expedite participation of youth in the targeted programs. The State plan described procedures to address barriers related to fees, described options to pay for fees from other sources such as McKinney-Vento grants and Title I set asides.
<i>Limitations</i>	The peer reviewers noted that the State plan mentioned programs that homeless students should have access to, but did not provide specifics on how to remove the barriers.
<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>	One peer reviewers indicated that the State plan would be strengthened if specific procedures were described to support access to academic and extracurricular programs and remove any associated barriers.

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 observed that the State plan provided strategies to address enrollment delays related to immunization, health records, residency requirements, guardianship, dress codes, and lack of records. The plan described how the State works with several associations to help districts develop policies and procedures to help ensure that such barriers are removed and do not cause delays in enrollment.
<i>Strengths</i>	The peer reviewers observed that the State plan provided strategies that show how the SEA monitors LEA policies, procedures, and guidelines regarding enrollment of homeless children and youth, and how LEAs must provide information on their review and revision of policies that may create enrollment barriers, including those related to the targeted areas in the requirement. The peer reviewers also noted that the State plan described how the SEA works with both the Colorado Association of School Executives (CASE) and the Colorado Association of School Boards (CASB) to support developing policies and procedures for school districts. The SEA posts information for districts on the SEA website, as well as information regarding technical assistance, training, and monitoring.
<i>Limitations</i>	The peer reviewers noted that the State plan identified each of the areas listed in this requirement but did not provide much detail on how each area is addressed, or what the policies and procedures include.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3) Reviewers <input type="checkbox"/> No
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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 plan briefly addressed the barriers mentioned in the requirement and demonstrated that the SEA has several measures for the local review of policies that may prevent barriers for homeless children and youth, but did not include information about the review and revision of State policies.
<i>Strengths</i>	The peer reviewers observed that the plan demonstrated that the SEA reviews the process that LEAs use to review and revise barriers to the enrollment and retention of homeless children and youth, including barriers due to fees, fines and absences as part of their monitoring protocol. The peer reviewers also noted that the State plan demonstrated that the SEA coordinates with the Colorado Association of School Executives and the Colorado Association of School Boards to provide model policies and guidance to address barriers to enrollment and retention. The peer reviewers also observed that the State plan demonstrated how the SEA addresses this requirement via training, instructing schools in the use of fee waivers, program set-asides, and public donations to defray school fees for students in need.
<i>Limitations</i>	The peer reviewers noted that while the State described multiple avenues for ensuring that LEAs review and revise their policies to eliminate barriers for homeless children and youth, the plan did not describe methods the SEA uses to review and revise State policies and procedures to address each of the barriers identified in the plan.
<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>	The peer reviewers indicated that the State plan would be strengthened by demonstrating that the SEA has processes it uses to review State-level policies and procedures to remove barriers to identification, enrollment and retention of homeless children and youth, and barriers related to outstanding fees, fines, or 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 reviewers observed that the State plan described training opportunities for school counselors but did not agree that the plan specifically described that the training addressed college readiness for homeless youth. The plan was observed to have described assistance to homeless youths via the Individualized Career and Academic Plan (ICAP), and training counselors receive on meeting the special needs of homeless students.
<i>Strengths</i>	Peer reviewers observed that the State plan referenced a State statute that allows unaccompanied homeless youth to qualify for in-State tuition, and all students in the State complete an Individualized Career and Academic Plan (ICAP). The plan also described how the SEA provides awareness training to school counselors through its regional professional development activities and makes available to all students programs at the post-secondary level such as the Single Points of Contacts at the college level. SEA coordinates efforts between SEA and LEAs to heighten awareness of the needs of the homeless students in relation to college readiness. All students complete and ICAP and use of Single Points of Contacts at the college level.
<i>Limitations</i>	The peer reviewers noted that, although training on identifying children and youth experiencing homelessness is mentioned for counselors, specific training on assisting homeless youth with college access was not clearly articulated.
<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>	The peer reviewers indicated that the State plan could be strengthened if it demonstrated how it will ensure that counselors are specifically trained on assisting homeless youth with college access and assistance for unaccompanied homeless youth.