

STATE PLAN

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

State Name: District of Columbia



U.S. Department of Education
June 21, 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 agreed that the SEA described procedures it will use to identify homeless children and youth in the State and to assess their individual needs.
<i>Strengths</i>	A particular strength noted by the peer review panel was the coordinated accountability available through integrated data systems that provided access to information on children, youth and families served by a wide variety of other homeless assistance agencies and organizations, including The Community Partnership for the Prevention of Homelessness (which manages the Continuum of Care and Homeless Management Information System for HUD-funded grantees). The panel noted that care was taken to ensure that partnership agreements are in place and any disclosure of personally identifiable information by the SEA is compliant with FERPA requirements. The SEA receives regular reports from, and has regular access to the integrated data system, in order to ensure that all children and youth were enrolled in school and to know what services they were receiving to address their specific needs.
<i>Limitations</i>	One significant limitation of the State plan observed by the peer review panel was that it was not clear whether the integrated data system only included children and youth who were sheltered or unsheltered while experiencing homelessness or whether it included those who were sharing the housing of others due to loss of housing or staying in hotels/motels because they lacked a fixed, regular and adequate nighttime residence. Furthermore, while the SEA stated that it uses these data to evaluate program effectiveness and align program activities to needs identified through data analysis, nothing specific about current needs or goals was mentioned. It was recommended that the SEA articulate clearer procedures for systematically analyzing various kinds of information and data.
<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 review panel agreed that the SEA described procedures for the prompt resolution of disputes regarding the educational placement of homeless children and youth.
<i>Strengths</i>	The SEA provided a narrative to describe these procedures as well as a hyperlink to appeal and dispute resolution forms and guidelines on its website which had more precise information, including timeframes for the prompt resolution of disputes at each step.
<i>Limitations</i>	Some reviewers noted that it was hard to find this information on the SEA’s website until one opened the uploaded forms and observed it would have been better to include all of procedures in the State plan narrative. Based on the peer review, it is recommended that the SEA include more specific information about the timeframes for LEA disputes and SEA appeals in its description of procedures for the prompt resolution of disputes.
<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 review panel agreed that the SEA described various programs or ways it would provide support for school personnel to heighten their awareness of the specific needs of homeless children and youth, including unaccompanied homeless youth.
<i>Strengths</i>	The SEA meets the requirement for support of school personnel through the use of professional development training and webinars being offered to all staff. The SEA offers annual trainings to LEAs and school-based liaisons that focus on the liaison’s responsibility, data reporting tools, and resources to support children and youth experiencing homelessness. It also refers LEA personnel to online trainings and resources available through NCHE and NAEHCY.
<i>Limitations</i>	It was not clear if the SEA makes its own trainings available to LEA staff unable to attend them in person. One reviewer recommended that the description of programs mention more specific coordination topics and resources such as through Title I, Part A, special education, and mental health services. The SEA could elaborate more on specific training topics tied to LEA and community resources, also making this information available for LEA staff who could not attend a training in person.
<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.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 agreed that the SEA described several procedures that ensure that homeless children have access to public preschool programs by collaboratively working with other agencies serving families that are experiencing homelessness to ensure preschool enrollment.
<i>Strengths</i>	The SEA and the integrated system of care managed by TCP identifies preschool-aged students who are eligible but not currently enrolled in early childhood programs. This collaboration ensures access to public preschool. The SEA also extended the licensing regulations by allowing an additional 60 day grace period for required documentation, and immunization for enrollment in community based early childhood educational settings. Coordination of professional development and outreach to DHS and other community organizations by developing coordinated entry systems helps identify families and young children in need of early childhood opportunities.
<i>Limitations</i>	The panel noted it was unclear exactly how doubled-up homeless young children and their families would be reached. The SEA could be more specific about how those young children experiencing homelessness, who are not living in family shelters or unsheltered situations identified by other agencies, will be ensured access to preschool programs.
<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 review panelist did not all agree the SEA described procedures that ensured this requirement were met. It was clear that out of school youth who went to the reengagement center could receive appropriate credit for full or partial coursework satisfactorily completed while attending a prior school. However, it was not clear whether a homeless youth who was transferring from one school to another during the middle of a semester or into the district at any point in the school year would also be covered by the same procedures.
<i>Strengths</i>	The plan section on Supports for Re-Engagement presumably addresses the identification and supports for out of school youth experiencing homelessness and there was mention of credit recovery for them.
<i>Limitations</i>	Specific procedures at the SEA (and perhaps LEA) level that address the identification, appropriate secondary education and support services that will be provided to youth and youth separated from public schools should be described. There was no mention of how to award partial and full credit to secondary students who are not out of school or do not need a re-engagement center and have satisfactorily completed coursework recently in their previous school. Also, this section was not addressed separately in the State plan.
<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>	The SEA should describe specific procedures for full or partial credit transfer. These procedures could also be tied to efforts to improve graduation rates for transferring or enrolled students experiencing homelessness.

- **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 generally agreed that the SEA described procedures that met this requirement. However, not all academic and extracurricular activities following “including...” were mentioned.
<i>Strengths</i>	The SEA states that much of its technical assistance and monitoring of LEAs focuses on removing the barriers for homeless students to full participation in all school activities offered by LEAs. The end of this section enumerated several procedures the OSSE implements to remove or overcome barriers homeless children and youth face in accessing academic and extracurricular activities, including assistance with fees or fee waivers for extracurricular activities, transportation assistance, and support for homeless students to join programs that facilitate access to career and technical education and post-secondary education.
<i>Limitations</i>	Some other programs were not specifically mentioned although DC has magnet schools, summer schools, and charter school programs.
<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>	The SEA should describe more about its procedures to remove barriers to all of the program types mentioned that are available in DC.

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 agreed that the SEA had general strategies in place for categories that appear to cover all five enumerated elements in the requirement of “other problems.” A few specific topics were not mentioned but broader categories that may cover them were mentioned.
<i>Strengths</i>	Several topics were specifically addressed, including health, school records, and uniforms. The SEA strategies for all of the topics seemed to provide more training and publicizing of the educational rights of homeless children and youth, including to parents and students, to raise their awareness and to regularly review barriers to enrollment with stakeholders and revise policies where appropriate. When barriers are put up by particular LEAs they are reviewed and revised through the monitoring process.
<i>Limitations</i>	The description did not specifically mention immunizations, birth certificates or guardianship issues although it mentions health, residency and education records in general.
<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>	The SEA should describe its strategies so that all topics listed in this requirement are specifically addressed by at least one strategy.

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 agreed that the SEA did not demonstrate that it met this requirement because there was no specific mention of policies concerning fees or fines or absences. However, a general process of engaging stakeholders is in place for reviewing and revising policies to remove barriers to the identification, enrollment and retention of homeless children and youth in schools in the State.
<i>Strengths</i>	The SEA stated that it collaborates with a good array of external stakeholder groups, including legal advocates, to review and revise policies. It also uses data analysis to assess where policies might need to be revised or strengthened.
<i>Limitations</i>	There was no mention of current or proposed policies addressing barriers to enrollment and retention due to outstanding fees or fines, or absences.
<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>	The SEA should describe specific policies that it has developed, reviewed and/or revised that address these topics. For example, the analysis of housing data could be tied to attendance or absences. Engagement with external stakeholders could be used to develop or revise policies to remove barriers to enrollment and retention due to outstanding fees or 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 review panel agreed that the SEA described many areas where opportunities are provided for EHCY students in receiving information for college readiness.
<i>Strengths</i>	The peer reviewers observed that counselors are used to provide assistance with FAFSA, college tours, and other college related activities. They offer college starter kits that include essential items needed for college students. There is additional training for homeless liaisons in the areas of postsecondary opportunities.
<i>Limitations</i>	The peer review panel observed that there was more of a focus on what the students receive after graduating rather than during high school.
<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>	