

STATE PLAN

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

State Name: Florida



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;
- 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>	Reviewers shared differing observations about the plan’s inclusion of descriptions of procedures and activities the SEA and LEAs will use to ensure the identification of homeless children and youth, including through technical assistance, professional development, evaluation of local programs, and communication (website, phone, and in person). Reviewers observed that the plan included various strategies for assessing the needs of the homeless student population in the State, including through the tracking and usage of high-level performance indicators, risk assessment analysis, and SEA monitoring of LEAs.
<i>Strengths</i>	Reviewers identified strengths in the plan’s inclusion of a variety of strategies the SEA will use to ensure the identification of homeless children and youth in the State, including using data to assess student needs and whether districts are doing an appropriate job of identifying students (risk assessment), sharing an identification checklist with LEAs, monitoring, various technical assistance supports (statewide meetings, a State conference, regular telephone and face-to-face meetings with liaisons, a monthly newsletter, and a comprehensive website). Also noted was the plan’s mention of the support that will be provided to programs by the former State Coordinator and retired liaisons.
<i>Limitations</i>	It was noted that the plan did not include procedural steps on how the SEA or LEAs identify homeless students.
<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 indicated that the plan could be strengthened by describing the procedures (possibly a step by step process) the SEA and/or LEAs will use to identify homeless students.

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>	Reviewers observed that the plan described multiple ways that the SEA is informing LEAs of the new ESSA provisions regarding the dispute resolution process and providing LEAs with technical assistance to ensure they are equipped to resolve local-level disputes. It was also noted that procedures included specific information given about when a decision cannot be agreed upon at the local level, then the dispute rises to the State Coordinator’s office. Reviewers also observed, however, that the plan did not address a timeline to ensure the prompt resolution of disputes.
<i>Strengths</i>	Reviewers saw strengths in a variety of plan elements, including the description of updates to the dispute resolution process and how these updates have been communicated to the field (written updates, statewide calls, and workshops), the inclusion in the process of guidance from various stakeholders, and a policy checklist to ensure that LEA homeless education policies include the dispute resolution process.
<i>Limitations</i>	Reviewers noted that the plan did not describe when the dispute resolution process will go into effect, or how the prompt resolution of disputes will occur given the lack of specific timelines.
<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>	Reviewers indicated that the plan could be strengthened by including timelines for the prompt resolution of any disputes, including timelines for both the local and State levels.

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>	Reviewers observed that the plan detailed multiple ways in which school personnel will receive the training required and necessary for them to provide appropriate services to homeless children and youth. It was noted that the plan allows for flexibility in what the State Coordinator and local liaisons will offer to school personnel to heighten their awareness of homelessness and address the specific needs that a school building or group of school personnel may have in identifying, serving and supporting homeless children and youth.
<i>Strengths</i>	Reviewers identified strengths in the plan’s description of the variety of training and technical assistance activities that will be provided to local liaisons to share with school personnel to assist in identifying homeless students. Reviewers also noted the variety of training and TA methods (conferences, conference calls, webinars, and email) that will be used to address key areas of the law such as identification, immediate enrollment, and educational rights.
<i>Limitations</i>	Reviewers noted that the plan was lacking specific details on how school personnel should work with runaway youth and what accountability mechanism might be used to track which school personnel are participating in training and TA and how often they are doing so.
<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.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>	Reviewers observed that the plan offered detailed descriptions of the SEA’s preschool programs and how homeless children will be able to access them, as well as State-level collaborations, including with the Office of Early Childhood, Head Start, the Interagency Coordinating Council and others.
<i>Strengths</i>	Reviewers identified strengths in the plan’s description of the multiple programs that are available for homeless preschool children, and of how homeless children qualify and should be included in those programs. Reviewers also identified strengths in the plan’s description of efforts to collaborate and coordinate with a variety of State-level programs, including the Office of Early Learning, Head Start, the Interagency Coordinating Council and others. Strengths were also noted in the plan’s description of requirements that have been established in the SEA’s statute and administrative code to ensure that homeless preschoolers have the same access to public preschool programs as non-homeless preschoolers. Peer reviewers also identified strengths in the plan’s description of how districts will work with families who may be struggling with documentation or other program enrollment requirements, and of the inclusion of local-level preschool provisions that will be reviewed by the State Coordinator during monitoring.
<i>Limitations</i>	It was noted that the procedures for each program vary program to program, and that the State may want to specify that children who are experiencing homelessness and are on waiting lists for services, such as Head Start, are to be given priority.
<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 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>	Reviewers observed that the plan described ways in which students can earn partial and full credit, as well as available credit recovery options. Reviewers also noted the plan’s description of a variety of activities aimed at meeting the requirements of this State plan requirement, such as collaboration with community organizations to assist with the identification of students separated from school, support to local liaisons through a variety of training and technical assistance offerings, and monitoring by the State Coordinator to ensure compliance.
<i>Strengths</i>	Reviewers identified strengths in the plan’s description of the professional development provided to local liaisons and a variety of school staff related to identifying homeless youth and youth separated from public schools, and supporting students in accruing credits. Reviewers also saw the plan’s discussion of the various opportunities that homeless students have to gain partial and full credit, options for credit recovery, and the usage of a student progression plan for high school students as a strength in the plan. Reviewers also identified strengths in the plan’s description of how LEAs work with community organizations to identify students who are separated from schools, and in the plan’s mention of the usage of a student housing questionnaire as part of school registration, and LEA monitoring by the SEA.
<i>Limitations</i>	It was noted that the plan did not provide specific details of how districts and the community go above and beyond to find students who are separated from school.
<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>	Peer reviewers observed that the plan included specifics on how LEAs provide homeless students access to extracurricular activities, but did not include specifics on how homeless students access magnet schools, summer schools, career and technical education programs, advanced placement courses, and charter school programs. Reviewers also observed that the plan included a comprehensive list of technical assistance activities offered to LEAs/liaisons to ensure compliance with this requirement. Reviewers also noted that the State plan outlined procedures to ensure that students do not face barriers to accessing academic activities, noting specifically that homeless liaisons are required to be proactive in communicating (via email, phone, text, and listservs) enrollment requirements, deadlines, and other processes to families who are experiencing homelessness.
<i>Strengths</i>	Reviewers identified strengths in the plan’s description of how the SEA and LEAs work to provide appropriate accommodations to assist homeless students in participating in extracurricular activities, including through extracurricular programs holding spots for homeless children and youth. Reviewers also noted the plan’s description of the support provided to LEAs by the State Coordinator, including a variety of training and technical assistance opportunities, and monitoring.
<i>Limitations</i>	Reviewers indicated that the plan did not address in detail many of the programs included in the question, such as magnet schools, summer schools, career and technical education programs, advanced placement courses, online learning, and charter school programs.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> No (3) Reviewers
<i>If no, describe the specific information or clarifications that an SEA must provide to fully meet this requirement</i>	Reviewers noted that the plan could be strengthened by including detailed information about how homeless students have access to programs such as magnet schools, summer schools, career and technical education programs, advanced placement courses, online learning, and charter school programs. Reviewers indicated that while the plan mentions that they have access to all of these; specifics were not provided and would have strengthened the plan.

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>	Reviewers observed that while the plan states that all districts have policies on immediate enrollment, it did not fully describe what is/should be in these policies or how the SEA will provide strategies relating to enrollment delays caused by items i-v in the requirement.
<i>Strengths</i>	Reviewers identified strengths in the plan’s statement that all districts have policies regarding immediate enrollment, including that all information required for enrollment is waived for homeless students. Reviewers also noted strengths in the plan’s description of its three-tier plan to support and assist LEAs, which allows for an array of strategies and supports that can be implemented at the State and local levels, and in the plan’s inclusion of SEA monitoring of LEAs and their policies/practices through desktop and onsite reviews.
<i>Limitations</i>	Reviewers noted that the plan lacked details on how the SEA will specifically provide support to ensure that enrollment delays are not occurring for homeless children and youth at the local level, and what should be included in the policies for immediate enrollment.
<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>	Reviewers indicated that the plan could be strengthened by providing details of what should be in the immediate enrollment policies, and what districts are expected to do when the specific missing documentation is not available or if there are guardianship or uniform or dress code requirement issues.

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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>	Reviewers observed that the plan indicated that policies and procedures are reviewed at the State, while LEA policies are reviewed when technical assistance is provided and LEAs are monitored. It was also noted the plan's provided a detailed description of how the State Coordinator serves on multiple councils and committees that review and revise policies that may present barriers to homeless students. Reviewers noted, however, that the plan did not address how LEAs should handle outstanding fees and fines, and that it discusses attendance, but not absences specifically.
<i>Strengths</i>	Reviewers identified strengths in the plan's description of the State Coordinator's work with multiple organizations and councils to assess and address the needs of homeless students through policy review and revision. Reviewers also noted the plan's description of what appears to be ongoing review by the State Coordinator in regards to policies that address any inconsistencies or ambiguities.
<i>Limitations</i>	Reviewers noted that the plan did not provide any information on how LEAs should handle outstanding fees or fines, or absences, or how the SEA will work with LEAs to address these issues.
<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>	Reviewers indicated that the plan could be strengthened by addressing barriers due 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>	Reviewers differed in their analysis of this plan’s narrative response to the requirement. Reviewers observed that the plan demonstrated a well-focused initiative by all counselors to serve at-risk and homeless students in preparing for college and that the plan provided a variety of ways for homeless youth to receive assistance from counselors, but did not provide a detailed discussion regarding the amount of information being provided to students that is homeless youth-specific for those students who qualify for the homeless program.
<i>Strengths</i>	Reviewers identified strengths in the plan’s description of how homeless students may receive free tuition to State public colleges, universities, and technical schools through a status verification letter for their first semester after high school and in the plan’s description of how counselors and other school personnel provide post-secondary information to all students. It was also noted that the plan offered description of the array of options for homeless students, including: Options to understand and be exposed to college; presentations by colleges; being exposed to college via college classes and campus visits; lunchtime at a college, the guidance and assistance that counselors provide to students in completing the FAFSA; the provision of a homeless verification form; and connections to resources.
<i>Limitations</i>	Reviewers noted that homeless youth sometimes require different college/career readiness assistance from counselors and other school personnel, but the plan did not provide many details.
<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>	Reviewers indicated that the plan could be strengthened by addressing the specific activities that counselors will implement to assist homeless youth over and above what they do for non-homeless students. For example, the plan could include that counselors are to share homeless-specific resources to homeless students from national organizations, and information regarding the FAFSA specific to unaccompanied homeless youth.