

STATE PLAN

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

State Name: Georgia



U.S. Department of Education
September 2017

Background

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

Role of the Peer Reviewers

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

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

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

How to Use This Document

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

Instructions

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

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

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

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

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

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

	Peer Response
Peer Analysis	Peer reviewers observed that while included information relative to the requirement, the plan did not detail the procedure for identification of homeless students or provide details on how the data are collected and how they will be used to inform programmatic decisions. It was also noted that while the plan described how local liaisons are designated and will identify homeless students, the plan did not describe how student needs will be assessed.
Strengths	Peer reviewers noted strengths in the State plan’s description of how data will be used to plan for program activities, including the SEA’s ability to disaggregate and analyze student data. Reviewers also identified strengths in the plan’s description of how the State and school districts will collaborate in assessing the needs of homeless students, and in the plan’s description of training that the State will provide to local liaisons to improve liaison knowledge and facilitate student identification.
Limitations	Peer reviewers noted that plan was not specific about procedures for the identification of homeless children and youth. Reviewers observed that more information was need on how data will be used to inform program activities, and guide State and/or district priorities or specify how student needs will be assessed.
Did the SEA meet all requirements?	<input checked="" type="checkbox"/> No (3) Reviewers
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	Peer reviewers indicated that the plan could be strengthened by providing a more detailed description of the process that will be used to ensure the identification of homeless children and youth. Reviewers noted that the plan would be strengthened by describing how data will be collected and used to inform programmatic decisions at the SEA and LEA levels, and to guide training priorities. Reviewers indicated the plan would be strengthened by describing how the needs of homeless children and youth will be assessed and addressed, including by specifying how homeless children and youth will be tracked in their statewide accountability system. It was also noted that the plan would be strengthened by describing the role of local liaisons in providing training to other district personnel to facilitate the identification of 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?**

	Peer Response
Peer Analysis	Peer reviewers observed that the dispute resolution policy in the plan met the requirement, including detail and specificities, and articulating a multi-level process that includes written notification to the parent and a timeline for resolution.
Strengths	Peer reviewers identified strengths in the plan’s level of detail, including regarding the multiple steps of the dispute resolution process, the timeline for the various steps, and the stakeholders to be involved in the process.
Limitations	It was noted that while the State’s plan includes a timeline for the SEA to rule on disputes, and described review of local decisions, it did not make clear that a formal monitoring process to ensure appropriate compliance at the local level was in place.
Did the SEA meet all requirements?	<input checked="" type="checkbox"/> Yes (3) Reviewers
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

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?**

	Peer Response
Peer Analysis	Peer reviewers observed that the plan met the requirement by describing multiple means of training and professional development that is available to LEAs, but did not include detail about what professional development is required, and/or what is required for the LEA to show the SEA at the time of monitoring.
Strengths	Reviewers noted strengths in the plan based on the variety of professional development programs and resources, including brochures and other materials, offered to local liaisons and other LEA staff. Reviewers also noted strength in the plan’s mention of SEA monitoring of an LEA’s provision of professional development to LEA personnel and stakeholders, including requiring LEAs to have written procedures for the provision of professional development.
Limitations	Reviewers observed that the plan did not describe what is required when an LEA is monitored for having a professional development plan, including written procedures and how often this occurs. It was also noted that the plan did not describe specific types of professional development available, and noted that there needs to be clarification as to how materials are distributed, how data is used to inform training priorities, and the role of the local liaison with training.
Did the SEA meet all requirements?	<input checked="" type="checkbox"/> Yes (2) Reviewers <input checked="" type="checkbox"/> No (1) Reviewer
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	It was indicated that the SEA should include what are the specific requirements for LEAs to have in their plans for training, and what is expected for the monitoring process. It was also noted that the plan did not describe what the required professional development is for liaisons and did not describe specifics for training the different staff positions described in the question.

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?**

	Peer Response
Peer Analysis	Reviewers observed that while the plan noted that the State did not have a public preschool program, it also noted that in the circumstances where a program does exist, preschool homeless students are to be prioritized for enrollment and receive the protections found under the McKinney-Vento Act. It was observed that the SEA works with multiple organizations that work with preschool students to make sure that staff are trained and prepared to serve this age group of students experiencing homelessness.
Strengths	Reviewers saw strengths in the plan’s description of collaborations, including with local liaisons, Head Start, Child Care Development Fund, homeless coalitions, and other preschool organizations that coordinate to train and implement programs. Reviewers also noted the plan’s description of how preschool children who are homeless should be prioritized for program enrollment (including the MOU with the Georgia Head Start Association).
Limitations	Reviewers observed that the plan did not address tracking homeless students enrolled in the special education early education program. It was noted that, since Georgia did not have a universal preschool program, no specific plan limitations were noted, with the exception of the limited situations where public preschool exists, information was not given regarding what procedures are in place to ensure that homeless students are prioritized and receive protections under McKinney-Vento.
Did the SEA meet all requirements?	<input checked="" type="checkbox"/> Yes (3) Reviewers
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	

- **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?**

	Peer Response
Peer Analysis	Reviewers observed that the plan provided a description, but did not provide detail and specific steps or procedures that are in place and followed to ensure this requirement is met. Areas mentioned where detail was lacking include how districts may use data to help students, how homeless youth who are separated from public school will be identified, and how the SEA and LEAs will remove barriers. It was noted that the plan described how LEAs may collect and analyze data to help students receive partial credit for the work they have done, and give them the opportunity to achieve the credits they may need.
Strengths	Reviewers identified strengths in the State plan's description of how LEAs can award partial credit to mobile students, and ensure that homeless students have the ability to earn the credits that they need, including the plan's mention of a database that can use attendance, homework, and test score data to assist with the awarding of full or partial credit.
Limitations	Reviewers observed that the plan did not provide details, including information about options available to districts and how students who are separated from schools will be identified and provided services. One reviewer noted that while the plan referenced the tracking of some data, it did not clarify how those data will be used to address the needs of students beyond facilitating the awarding of partial credit.
Did the SEA meet all requirements?	<input checked="" type="checkbox"/> Yes (1) Reviewer <input checked="" type="checkbox"/> No (2) Reviewers
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	Reviewers indicated that the plan could be strengthened by describing policies and procedures regarding identification, technical assistance, removing barriers for homeless youth and youth separated from the public school system, the awarding of partial and full credit, and the collecting and using of data to identify issues and areas of need.

- **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?**

	Peer Response
Peer Analysis	Reviewers noted that the plan did not provide a detailed response to this requirement. While it mentioned that homeless students must have access to all of the programs listed, it did not provide a description of how LEAs should remove barriers to and assist students in accessing these programs.
Strengths	Reviewers identified strengths in the plan's indication that the SEA will require all LEAs to write and implement a locally developed policy, and in the plan's listing of all of the areas that are included in the question, including a specific description of what the SEA considers full participation in school.
Limitations	Reviewers noted that the plan states that students should not have barriers to full participation in school, including all areas and programs included in the requirement, but did not provide specifics on issues such as how the SEA will monitor LEAs' locally developed policies, including whether the policies are accurate vis-à-vis the law.
Did the SEA meet all requirements?	<input checked="" type="checkbox"/> No (3) Reviewers
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	Reviewers indicated that the plan could be strengthened by providing specific details on each of the programmatic areas described in the requirement. Reviewers suggested including specifics about LEA policies and procedures for helping students access these programs. It was also noted that many of the areas listed in the requirement have specific rules based on State law, such as the waiver of a time period for specific enrollment timelines for magnet or charter schools.

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?**

	Peer Response
Peer Analysis	Reviewers observed that the plan addressed all areas presented in the requirement, stating that the lack of any of these documents should not be a barrier to LEAs enrolling students experiencing homelessness immediately while working on acquiring the documents, and citing specific strategies to be followed in the case of areas that are in need. It was also noted that the plan did not provide the implementation information for the strategies mentioned.
Strengths	Reviewers identified strengths in the plan’s strategies for reducing enrollment delays, including the requirement that districts enroll and have students attending school immediately, even when documents are missing, noting that documents may be obtained after enrollment and attendance are in place. It was also noted that a strength of the plan is the mention of using McKinney-Vento funds and/or Title I, Part A funds to assist with uniform and/or dress code requirements.
Limitations	One reviewer noted that while the plan encourages liaisons to enroll students during disputes, the SEA should assure that homeless students are allowed enrollment in the requested school while the dispute process is occurring. It was also observed that the plan did not indicate monitoring or data use to identify areas of priority or for training, or provide evidence of policies.
Did the SEA meet all requirements?	<input checked="" type="checkbox"/> Yes (2) Reviewers <input checked="" type="checkbox"/> No (1) Reviewer
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	One reviewer indicated that the plan could be strengthened by providing details about how the SEA will instruct all LEAs and encourage homeless liaisons. The reviewer also indicated that the plan needs to provide comprehensive, detailed strategies to address the various problems regarding enrollment delays.

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

- **Does the SEA demonstrate that the SEA and LEAs in the State have developed, and shall review and revise, policies to remove barriers to the identification of homeless children and youth, and the enrollment and retention of homeless children and youth in schools in the State, including barriers to enrollment and retention due to outstanding fees or fines, or absences?**

	Peer Response
Peer Analysis	Reviewers observed that the plan referenced specific State and local policies and rules, the provision of guidance to LEAs to help them remove barriers to the enrollment and success of homeless students, and monitoring. However, reviewers also noted that the plan did not specifically address removing barriers to the identification and retention of homeless students.
Strengths	Reviewers found strengths in the plan’s description of the rules and guidance that the SEA has adopted to help assist with removing barriers that may pose issues for homeless students, and the plan’s mention of the SEA’s monitoring of districts related to these areas. Reviewers also noted strengths in the plan’s requirement that LEAs review and/or revise their McKinney-Vento policies annually.
Limitations	Reviewers noted that the plan did not specifically describe how barriers to the identification of homeless students have been removed, and did not provide details about State rules and guidance regarding fees, fines, and absences. Reviewers also observed that the plan cites State and local polices, including reviewing and revising them annually, but did not provide detailed information regarding how monitoring information is used to ensure the policies are followed and barriers do not exist. Reviewers also did not find information on training for various staff regarding the removal of barriers for homeless students.
Did the SEA meet all requirements?	<input checked="" type="checkbox"/> Yes (1) Reviewer <input checked="" type="checkbox"/> No (2) Reviewers
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	Reviewer indicated that the State plan could be strengthened by including more specific details on all components of the requirement, including addressing barriers to the identification of homeless children and youth. It was also noted that while the plan states the policy, it did not provide details about what is done to ensure the removal of these barriers and how monitoring findings are used to guide training and policy revision.

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?**

	Peer Response
Peer Analysis	Reviewers observed that the student profile that contains a transition plan that connects to the student schedule and programs of instruction allows for counselors to track homeless students throughout their schooling and will help prepare them for college readiness. It was also observed that the plan did not provide details on how youth will receive assistance from counselors. Reviewers noted that while the plan requires counselors to meet with and provide transition plans for all students, the unique needs of homeless students may not be addressed through this approach, including specific supports for which only students experiencing homeless qualify.
Strengths	Reviewers saw strengths in the plan’s mandate that counselors meet with all students annually, including homeless students, and that the LEA must provide each student with a profile that contains a transition plan.
Limitations	Reviewers observed that while the process outlined in the plan catches all students, details were not provided regarding how counselors will be trained and required to address the unique needs of homeless students, and how the SEA will monitor the provision of this assistance by counselors.
Did the SEA meet all requirements?	<input checked="" type="checkbox"/> Yes (1) Reviewer <input checked="" type="checkbox"/> No (2) Reviewers
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	Reviewers indicated that the plan could be strengthened by providing a detailed description of how counselors advise and prepare youth for college, including describing specific assistance that counselors should be providing to homeless students above and beyond what is provided to all students. One example of this assistance is information specific to homeless students regarding the FAFSA and scholarship opportunities that may be unique to them.