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

State Name: Hawaii



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;
- <u>Limitations</u>: 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
  - o 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	Reviewers observed that the plan described procedures that the SEA/LEA uses to identify homeless children and youth and assess their needs, including offering an annual training conducted by the State Coordinator, using a variety of modalities to provide technical assistance, and coordinating with various agencies. However, reviewers also observed that the plan could provide more details about what is included in the protocol for identification, including other ways outside of the annual form that are used to identify homeless students, and what procedures will be used to assess student needs. It was noted that the plan described multiple ways that data is being used to improve and identify needs of the program, and demonstrated how the State is working to provide more funding and time for staff in the program to be able to identify and meet the needs of homeless students better.
Strengths	Reviewers noted strengths in varying aspects of this plan's narrative response, including the plan's mention of protocols and practices that are in place to identify homeless students and their needs, and its description of areas where the SEA/LEA are working to improve the program, such as preschool and expanding transportation. Reviewers also saw strengths in the plan's description of the SEA's coordination of a multi-level needs assessment for homeless children and youth, including data sharing and analysis to better serve this population. Strengths were also identified in the plan's description of collaborative partnerships with the Executive Office on Early Learning, Head Start, Hawaii Early Intervention Coordinating Council, and the State's Homeless Management Information System, and in the plan's description of how posters and brochures are translated into other languages for posting in communities, and how a verification form is used consistently by districts.
Limitations	Reviewers noted that the plan did not include details about the protocol for identifying homeless students and assessing their needs. Reviewers noted that most identification appeared to be gathered annually, but that it would be helpful to see more information on how a student is identified at other times during the year, such as through referrals. Reviewers also noted that it was unclear how districts learn about the identification process and specifically what type of technical assistance is being offered

	to homeless liaisons for identifying students.
Did the SEA meet all	⊠ Yes (2) Reviewers
requirements?	⊠ No (1) Reviewer
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	It was noted that the plan could be strengthened by including more comprehensive information about the protocols and practices mentioned in the plan. It was also noted that the plan could be strengthened by including information on the data collection that is conducted annually by each LEA and submitted to the State, and how the data is used with the technical assistance and in planning annual trainings.

# **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	Reviewers observed that the plan referenced a policy on the dispute process at the local level, but provided little detail regarding the SEA's dispute resolution process. Reviewers also noted that the information regarding when a parent or unaccompanied homeless youth would be able to file a dispute is somewhat inconsistent.
Strengths	Reviewers noted a strength in the plan's description of a multi-level process with timelines that goes from the principal to the Superintendent to the Deputy Superintendent.
Limitations	Reviewers observed that the plan did not include detailed information about the dispute process, including providing no information on the state responsibilities in the dispute process and limited information on what is required at the local level. It was noted that unaccompanied youth were not addressed.
Did the SEA meet all requirements?	⊠ No (3) Reviewers
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	Reviewers observed that the plan could be strengthened by providing more details at each level where the dispute may take place, such as building level, regional level (if applicable), and at the LEA and SEA levels. Reviewers also noted that the plan could be strengthened by addressing issues related to timeframe. Reviewers also noted that more specific details of how parents and unaccompanied youth may access the dispute resolution process would be helpful, such as how the SEA and LEAs will provide written notice in a manner that is understood by the parent, guardian, or youth. It was noted that the plan did not provide detailed information on immediate enrollment requirements and transportation rights for homeless children and youth while a dispute is occurring is included.

#### 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	Reviewers noted that the plan provided some information on technical assistance and professional
	development aimed at generating awareness, which focused on local liaisons, and did not address
	runaway and homeless youth.
Strengths	Reviewers saw strengths in the plan's annual updating of the McKinney-Vento 101 module that is used
	for training and its inclusion of collaboration with Title I.
Limitations	Reviewers noted that the plan mentioned that outreach, planning, and training will be provided, but
	additional detail was not provided regarding the trainings and who is required to attend.
Did the SEA meet all	⊠ No (3) Reviewers
requirements?	
If no, describe the	Reviewers noted that the plan could be strengthened by providing additional detail, including the type
specific information	of supports that will be provided for school personnel, how the various stakeholders in the question will
or clarification that	be included in training, the collaboration that occurs with Title I, and what kind of accountability
an SEA must provide	measures will be implemented to ensure that all groups are trained. It was noted that this is an area
to fully meet this	where the resources and supports from the National Center for Homeless Education can support the
requirement	SEA in meeting the unique training needs that may be needed for the islands in the State.

# 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 the plan did not include details on the procedures to be used to ensure access to
	public preschool programs for homeless preschool children. It was noted that the plan was not specific
	regarding collaboration efforts, cross policy reviews, identifying barriers, and what supports are
	available to help homeless preschool children to be able to attend preschool programs.
Strengths	Reviewers saw strengths in the plan's description of collaboration with and dissemination of
	information regarding public preschools to shelters, family-serving agencies, Hawaii Head Start, the
	Executive Office of Early Learning, and State-administered preschool programs.
Limitations	Reviewers noted that the plan did not demonstrate that procedures are in place to ensure preschool
	students have access to preschool programs.
Did the SEA meet all	⊠ No (3) Reviewers
requirements?	
If no, describe the	Reviewers indicated that the plan could be strengthened by describing the procedures that will be used
specific information	to ensure that homeless preschool students have access to programs. Reviewers indicated that the plan
or clarification that	could also be strengthened by addressing in greater detail the collaboration with the other agencies, and
an SEA must provide	by including information on prioritizing preschool age children who are experiencing homelessness on
to fully meet this	waiting lists. One reviewer noted that the plan could be strengthened by addressing how the needs of
requirement	young homeless children and their families will be identified and addressed through supports.

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 described how students are able to receive partial and full credit,
	including alternative options to implement in order to help students with credit accrual, but lacked
	details regarding youth not enrolled in school. Also noted was the plan's mention of Hawaii being a
	unitary State system, which helps with records transfers.
Strengths	Reviewers saw strengths in the plan's mention of the benefits of HI being a single SEA/LEA, including
	the easier transition of records, and the common courses that allow mobile students to gain partial and
	full credit. Reviewers also saw strengths in the plan's description of how the SEA/LEA provides
	options for partial credit and supplemental course option for students. One reviewer saw a strength in
	the plan's mention of how the SEA will continue to provide outreach and educational support.
Limitations	Reviewers noted that the plan could have included more examples of how students receive partial
	credit, and that the plan did not address the identification of youth that are not enrolled in public school.
	Additionally, it was noted that the plan states that Hawaii is currently exploring options for partial
D'1.1 CEA . 11	credits and online supplemental course work, so some items may not be currently available for students.
Did the SEA meet all	⊠ Yes (2 Reviewers)
requirements?	⊠ No (1 Reviewer)
If no, describe the	One reviewer observed that the plan could be strengthened if the needs of homeless youth who are
specific information	separated from public schools were addressed in the section.
or clarification that	
an SEA must provide	
to fully meet this	
requirement	

> 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 described how the SEA/LEA has removed barriers to students wanting to
	access extracurricular programs, including describing how athletic directors will be trained. Reviewers
	noted that, with the exception of extracurricular activities, the plan did not address the other portion of
	the requirement, including magnet school, summer school, career and technical education, advanced
	placement, online learning, and charter school programs, if available.
Strengths	Reviewers saw strengths in the plan's description of the participation of athletic directors in McKinney-
	Vento training, and the use of McKinney-Vento funds to cover fees for activity participation or
	equipment.
Limitations	Reviewers observed that the plan did not address magnet schools, summer school, career and technical
	education, advanced placement, online learning, or charter school programs. It was also noted that the
	plan should describe other options for covering academic or extracurricular fees.
Did the SEA meet all	⊠ No (3 Reviewers)
requirements?	
If no, describe the	Reviewers noted that the plan could be strengthened by including information about the procedures the
specific information	SEA/LEA uses to remove barriers to participation in magnet schools, summer school, career and
or clarification that	technical education programs, advance placement, online learning, and charter school programs.
an SEA must provide	Reviewers also noted that if the State does not have these programs, it is important to mention that.
to fully meet this	
requirement	

#### 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 indicated that the SEA has an immediate enrollment policy and that the SEA trains school staff and liaisons, but the plan did not provide details about how enrollment issues mentioned in items i-v will be addressed. Reviewers noted that the plan did not describe strategies the SEA/LEA uses to obtain the necessary records.
Strengths	Reviewers saw strengths in the plan's assertion that if a student is identified as homeless, immediate enrollment is granted, and that the enrollment policy prevents enrollment delays. Reviewers also saw strength in the plan's mention of the fact that Hawaii is a unitary system, which expedites records transfer. One reviewer saw strengths in the plan's description of the training of staff to ensure immediate enrollment, and the processes in place to ensure that students are provided assistance with getting a TB immunization when needed.
Limitations	Reviewers noted that the plan provided a general comment about students lacking documentation, but did not provide detailed information regarding resolving enrollment delays related to i-v in this requirement.
Did the SEA meet all requirements?	⊠ No (3 Reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	Reviewers noted that the plan did not address issues i-v in detail, and could be stronger if the SEA specifically addresses each of the components and how often the SEA trains staff and liaisons. It was noted that the plan needs to allow for students without a TB test and other immunizations or lack of records to enroll and attend school. It was also noted that the plan did not provide information on how the SEA/LEA will expedite records for homeless students who arrive from another SEA or from out of the country when records may not be as easily available as through the HI's unitary system.

#### **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 noted that the plan's description of supporting schools in removing barriers, accessing data elements to identify student academic needs, leveraging funding for students experiencing homelessness, and collaborating with state and local stakeholders demonstrates that the LEA reviews policies to remove barriers to the academic success of homeless children and youth. Reviewers also observed that, while the plan offers a lot of strategies regarding homeless issues such as barriers to identification, enrollment, and access to services, it did not provide specific details on how they will work on developing, reviewing, and revising policies to remove such barriers.
Strengths	Reviewers saw strengths in the plan's description of the barriers that need to be removed and the many efforts that are implemented to assist homeless students and the organizations that work with them. Reviewers noted the following specific efforts: State-level partnerships and agreements to address identification, enrollment, attendance, and success; tutoring supports; supplies; inter- and intra-agency agreements; and increasing the numbers of student support service personnel.
Limitations	Reviewers noted that the plan did not describe how the SEA/LEA specifically will remove barriers to the identification, enrollment, and retention of homeless students, or make specific reference of addressing barriers due to outstanding fees or fines, or absences.
Did the SEA meet all requirements?	⊠ No (3 Reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	Reviewers observed that the plan could be strengthened by describing how the SEA/LEA works to remove barriers to the enrollment and retention of homeless students, including through developing, reviewing, and revising policies. It was also noted that the plan would be stronger if it specifically addresses barriers related 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?

	Peer Response
Peer Analysis	Reviewers observed that the plan described SEA/LEA efforts to ensure that counselors are equipped to work with homeless youth on college preparation and readiness, including collaboration, individualized counseling, guidance, resources to help understand the FAFSA, and fee waiver options. It was also observed that the plan could did not provide details on resources that are available for counselors to meet the specific needs of homeless youth.
Strengths	Reviewers found strengths in the plan, including the plan's description of how local liaisons and counselors are being engaged to improve college readiness for homeless high school students, including receiving specialized training to ensure that the individualized counseling they provide to homeless youth equips them to understand what they need in their academic record to graduate from high school, how to select a college, how to submit the FAFSA (including for unaccompanied homeless youth), and how to seek out other financial aid supports.
Limitations	Reviewers noted that the plan did not provide detail regarding the resources that are available for counselors that address the specific supports needed by homeless students to enable them to succeed in post-secondary education; this includes resources available from State and local organizations, such as the National Center for Homeless Education. Reviewers also noted that the plan would be stronger if it provided more information on how the SEA/LEA ensures that counselors are trained and collaborate with local liaisons.
Did the SEA meet all requirements?	⊠ Yes (3 Reviewers)
If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement	