

STATE PLAN

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

State Name: Iowa



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 noted that the plan addressed the basic elements of how the LEAs identify homeless students and assess their needs, but did not provide details. Reviewers also noted that the plan provided information about the annual data collection and how the data elements are used at the local level to assess student needs, but emphasized LEA responsibilities with little detail provided about the responsibilities of the SEA.
<i>Strengths</i>	Reviewers identified strengths in the plan’s general description of the procedure LEAs use to identify homeless students and in the plan’s discussion of data, including how a universal desk audit online data collection system is used annually to collect data from LEAs, and how local liaisons are to use required data components and other academic elements to determine the needs of homeless students, preschools, and nonpublic schools. In addition, it was noted that the plan detailed how State-level data results may assist in identifying areas of need for districts.
<i>Limitations</i>	It was noted that the plan did not document non-academic issues that are used to assess homeless student needs, and that the plan would be stronger if it included more information on the unified action plan that is aligned to federal and State laws. It was also noted that the plan did not provide a clear description of how the State will ensure the identification of homeless children and youth, but was more prescriptive on the roles and responsibilities of the local liaison.
<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>	Peer reviewers noted that the plan could be stronger if it described how the SEA will address the nonacademic issues experienced by homeless students, and included more details about the appropriate procedures to which LEAs should adhere. In addition, reviewers noted that the plan would be stronger if it provided more comprehensive details on the SEA’s procedures, mentioning that plan requirement I.3 suggests appropriate procedures for this section, such as professional development, training sessions, website information, and technical assistance. It was also noted that the plan could be stronger if it

	<p>addressed how the SEA will use the annual data collection for specifically assessing the needs of homeless students and what strategies the SEA will use to assess the needs of districts related to identifying students and decide what technical assistance will be offered. More specifically, the reviewer expressed that the State may want to consider including specific technical assistance and tools from the National Center for Homeless Education, such as webinars, briefs, brochures, State presentations at conferences, and the specific procedures and activities that the State Coordinator will conduct with local liaisons in the district (such as compliance forums, regional trainings, monitoring, and program needs assessments).</p>
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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 provided general information about the steps of the State dispute resolution process, but did not indicate how the SEA is involved in the dispute process, a timeline to assure the prompt resolution of disputes, how many levels there are within the process, or who is involved.
<i>Strengths</i>	Reviewers identified strengths in the plan’s description of specific procedures that LEAs must go through to provide homeless families and students with the right to dispute a decision, and the plan’s reference to homeless students with special education needs.
<i>Limitations</i>	Reviewers noted that it is unclear whether the resolution of disputes would be prompt, as the plan did not address timelines. One reviewer also noted that the plan was not specific on how the SEA is involved in the dispute process, and seemed to communicate that local or State courts are involved in the dispute process.
<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 noted that the plan could be stronger if it described the role of the SEA in the dispute process. Reviewers also indicated that the plan could be stronger by providing more details on the process for parents, guardians, and unaccompanied youth, including describing how written decisions are provided to the appealing party, the step-by-step process to be followed at each level, and what timelines will be used.

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 provided different observations about the plan’s narrative for this requirement, observing that the plan provided limited information about specific types of training that are provided for the different stakeholders specified in the question, and also expressing that the plan described the steps the State Coordinator will take to provide technical assistance and training to school officials and other state department divisions to ensure compliance with the McKinney-Vento Act. It was also observed that the plan described multiple platforms for school personnel to receive training on the topic of homeless education.
<i>Strengths</i>	Reviewers identified strengths in the plan’s description of the various methods/platforms the State uses to train and share information with LEA staff, including a website that is updated with PowerPoint presentations on various topics, annual meetings, webinars, in-person meetings, listserv communications, and technical assistance by phone. Reviewers also saw strengths in the plan’s description of the training that is provided to charter schools and other agencies and divisions.
<i>Limitations</i>	Reviewers noted that the plan did not detail specific topics of trainings that are available to address the various needs of homeless students, or specific activities that will be provided to engage role groups such as principals, school leaders, attendance officers, teachers, enrollment personnel, and instructional support personnel.
<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 noted that the plan could be stronger by describing the other school personnel that need to be trained regarding homeless education awareness, as these various stakeholders have specific roles and responsibilities to homeless children and youth that the SEA should address.

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 shared differing observations about the plan. Peer reviewers observed that the plan states that homeless preschoolers have the same access to public preschool programs as do non-homeless preschoolers, with the plan referencing that priority is given to young homeless children in order to access programs and to remove barriers that may impact them at the local level. It was also noted that the plan described collaboration efforts, but did not include any specific procedures that ensure that homeless students have access to public preschool programs. It was also observed that the plan mentions that the SEA collaborates with various agencies to strengthen the implementation of this part of the plan.
<i>Strengths</i>	Reviewers identified strengths in the plan’s provision of information regarding internal partners and external agencies that the SEA and LEAs collaborate with to ensure access to programs for young homeless children, including Title I, migrant education, early childhood teams, and the Head Start office. Reviewers also noted the plan’s description of the State Coordinator’s close work with LEAs to review policies and discuss barriers that are identified by the local liaison.
<i>Limitations</i>	Peer reviewers indicated that the plan did not include any specific procedures that ensure that homeless children have access to public preschool programs and noted that the plan would be stronger if the SEA indicated if young homeless preschoolers are tracked.
<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 noted that the plan could be stronger by including examples of the procedures that are used in LEAs to prioritize services for young homeless preschoolers.

- **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 offered detailed procedures, such as local-level collaboration with other educational programs and external organizations, changes to administrative code/policy language, regular review of local policies by LEAs, working with LEAs, and ongoing training to ensure that homeless youth are identified and given equal access, and have the opportunity to earn full or partial credit.
<i>Strengths</i>	Reviewers identified strengths in the plan’s description of the SEA’s work with LEAs to update policies to assist homeless student with gaining partial and full credit for work that has been satisfactorily completed, and the adoption by the State of administrative code changes that address the awarding of full and partial credit to homeless students. Also noted was the plan’s mention of ongoing training and technical assistance, and in the plan’s mention of the reviewing and updating of policies and rules to ensure that homeless youth can access extracurricular and other academic programs, and description of collaboration between LEAs and external organizations to explore comprehensive and equivalent alternative education programs and support services for all homeless students.
<i>Limitations</i>	Reviewers indicated that the plan provided limited details about procedures, including those that LEAs should use to award partial and full credit for students in mobile situations, and to ensure that homeless youth separated from public schools are identified.
<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 noted that the plan could be stronger if it addressed how homeless youth separated from public schools are identified and are given equal access and provided more specific information on how LEAs will award appropriate full and partial credit to homeless youth.

- **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>	Reviewers agreed that the plan met this requirement, but noted that it only described general procedures for how homeless students do not face barriers when trying to access the programs described in the requirement. It was also observed that the plan described SEA collaborates with agencies such as the Iowa High School Athletic Association and Iowa Girls High School Athletic Union to ensure access to extracurricular activities for homeless youth. Reviewers also expressed that while the plan does mention homeless children and youth being able to access academic and extracurricular activities, including those offered for credit accrual or to make up work, a more enriched description of access to magnet school, online learning, and other programs will strengthen this area of the plan.
<i>Strengths</i>	Reviewers identified strengths in the plan’s description of the provision of ongoing training and technical assistance to school officials, the Athletic Association, and the Girls Athletic Union regarding removing barriers to program participation. Reviewers also noted strengths in some of the strategies mentioned in the plan, including the provision of transportation for program participation, the State’s updating of administrative code to address changes in the new law, and LEA exploration of other options to ensure program access.
<i>Limitations</i>	Reviewers indicated that the plan was not specific about what programs are available in the SEA. Reviewers also noted that the plan lacked detail about how the SEA will ensure that homeless students are able to access the programs listed in the requirement.
<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.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 noted that the plan described how the SEA works with LEAs and other organizations, but did not provide specific strategies to address the issues posed in the requirement, including enrollment delays due to lack of immunizations or documentation, or dress code requirements. It was also noted that the plan referenced Chapter 33 of the Iowa Administrative Code as addressing primary barriers.
<i>Strengths</i>	Reviewers identified strengths in the plan’s description of the State Coordinator’s regular review of various laws, regulations, policies, and practices to identify barriers that may exist at the State and local levels and addressing these barriers through the provision of training and technical assistance to LEAs, and the monitoring of LEAs. Strengths were also noted in the plan’s mention of the State Coordinator’s collaboration with a variety of agencies.
<i>Limitations</i>	Reviewers indicated that the plan did not provide specific strategies to address the problems described in items i-iv of the requirement.
<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 stronger if it addressed items i-iv of the prompt by detailing specific strategies that the SEA will provide to the LEA to address these issues, with reviewers specifically referencing a lack of birth certificates, school records, or other documentation.

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 provided differing observations about this requirement. Reviewers noted that the plan mentioned that the State regularly revises and updates policies and administrative code to address the needs of homeless students. Reviewers also observed that this particular part of the plan did not address the requirement, but removing barriers due to outstanding fees or fines, or absences was addressed in section I.5.
<i>Strengths</i>	Reviewers identified strengths in the plan’s description of the SEA’s regular review of laws, regulations, policies, and practices that may create barriers for homeless students, and the State policy that is aligned to federal law that requires the immediate enrollment of homeless children and youth.
<i>Limitations</i>	
<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 noted that the plan could be stronger if it addressed all the items in the requirement in this section of the plan, and if it discussed collaboration between the State Coordinator and various divisions at the State office to review policies that would apply to this section, and the resulting technical assistance that the State Coordinator would provide to educate and support local liaisons about these issues. Reviewers also indicated that the plan would be stronger if it discussed what resources the State uses or will use in training on identification, enrollment, retention, absences, and fees/fines, along with tracking tools that help to identify where problems may exist and the technical assistance that is needed.

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 provided differing observations about the State’s response to the requirement. Reviewers observed that the plan described resources that are available for counselors to help them support homeless students as they prepare for their post-secondary careers, and how the State is updating administrative code to include the new requirement for school counselors to specifically provide information for homeless students. The plan’s description of how all students will complete an individual plan for career and academics was also noted. However, reviewers observed that while the plan referenced the assistance that counselors will provide to students through advisement, resources from national partners and community organizations, and supporting students in maintaining their career and academic plan, it did not provide information on the new requirements under ESSA and the responsibilities of school counselors.
<i>Strengths</i>	Peer reviewers identified strengths in the plan’s description of updates to the State administrative code requiring counselors to provide certain information specific to homeless students, and how counselors will work with homeless youth in preparation for post-secondary/career readiness.
<i>Limitations</i>	Reviewers noted that the plan provided limited detail on the training that counselors will receive and how often they will receive it. Reviewers also expressed that the plan did not demonstrate that local liaisons and school counselors are receiving specialized training to ensure that individualized counseling is being provided to students who are experiencing homeless to understand what they need in their academic record to graduate from high school, enter college, submit the FAFSA, or receive verification of independent student status (unaccompanied homeless youth).
<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 stronger if it detailed professional development opportunities, resources, and technical assistance that will be provided to counselors through the State Coordinator’s office in collaboration with the State Office for School Counselors, and by local liaisons. It was also noted that the plan would be stronger if it described the training materials and resources that would be available to support homeless youth in their college preparation, including materials that are available through the National Center for Homeless Education. Reviewers also indicated that the form

	<p>to be used to document independent student status for unaccompanied youth should be included in the plan and provided to local liaisons and counselors to be used with all graduating unaccompanied homeless youth. Finally, it was noted that the plan should indicate that a roster of students receiving independent student status documentation should be maintained by local liaisons and made available during the Program Review Plan that is to be conducted by the State Coordinator.</p>
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