

# STATE PLAN

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

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State Name: Idaho



**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?**

	<i>Peer Response</i>
<i>Peer Analysis</i>	Peer reviewers observed that the SEA has a comprehensive set of policies and resources to assist LEAs in identifying homeless children and youth, and the plan specifically discussed identification activities to be carried out, including resources that are made available. However, it was also noted that the plan did not include a process for assessing the needs of homeless students after identification.
<i>Strengths</i>	Peer reviewers found the plan to be specific regarding the required components and expected activities to identify homeless students at the local level. Posters and other resources are provided by the SEA, and a standard Student Residency Questionnaire is used twice a year for all students. Additionally, reviewers noted that the SEA provides its LEAs with information from the National Center on Homeless Education.
<i>Limitations</i>	Reviewers noted that the State’s plan did not describe how SEA training is conducted, or how the use of resources and materials is monitored. Additionally, the plan did not cite data regarding whether or not the identification of homeless children and youth is a problem and, if so, what aspects need to be addressed.
<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 State’s plan could be strengthened by the inclusion of policies and/or procedures regarding the assessment of homeless student needs once they are identified.

**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>	Peer reviewers observed that the SEA has developed procedures and timelines for the prompt resolution of disputes, and provided a model for the required local policy. Reviewers also noted that the current procedure was initiated in 2010 and should be reviewed and revised as needed.
<i>Strengths</i>	The peer reviewers identified several strengths in the State’s plan, including that the SEA has a dispute resolution policy and provides a model local policy to districts. The State also provides sample letters and other resources to help ensure consistency across districts. Local policies are checked during monitoring, and reviewers noted that LEAs must align their dispute resolution process to the State protocol.
<i>Limitations</i>	It was noted by the reviewers that the State’s plan indicated that all local liaisons are aware of the dispute resolution requirements. However, it was unclear how that information is formally disseminated. Additionally, while the plan includes prompt written notice to parents, student transportation was not referenced.
<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>	Peer reviewers indicated that the State’s plan could be strengthened by updating the language (removing references to the No Child Left Behind Act). Additionally, it was noted that the inclusion of transportation provisions would benefit the dispute resolution protocol.

**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 State’s plan addressed the target audience of LEA local liaisons through mandated annual training, with the liaisons then being responsible for training other school staff. Additionally, the State is implementing an online training tool through Edify, allowing them to target professional development to LEAs based on identified barriers and needs. The reviewers also noted that the plan would benefit from more discussion of the professional development taking place at the local level and of the resources available in addition to those sessions.
<i>Strengths</i>	Reviewers noted strengths in the plan’s discussion of professional development provided to liaisons on federal and State law. The SEA is requiring all local liaisons to attend annual live training, encouraging the use of materials from the National Center for Homeless Education, requiring designated local homeless education liaisons to conduct annual training for all LEA staff including transportation, custodial, nutrition and secretarial staff, and offering online credentialing opportunities for McKinney-Vento liaisons.
<i>Limitations</i>	Reviewers observed that the State’s plan did not describe how it measures and monitors the effectiveness of training at the local level. Additionally, the State plan did not describe a mechanism to provide incentives for liaisons to participate in the online training. Reviewers noted that more detail is needed on how the local professional development, targeted toward specific groups (such as administrators, counselors, and transportation staff) will be carried out and documented.
<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, though the SEA has procedures in place to identify homeless children of preschool age, it is unclear how this translates into providing access to early childhood education.
<i>Strengths</i>	The peer reviewers saw strengths in the State plan's discussion of the Student Residency Questionnaire and its inclusion of questions about siblings in the family, which could include children of preschool age. Additionally, collaborations are in place with Head Start and the Idaho Infant and Toddler Council.
<i>Limitations</i>	Reviewers noted that the SEA described many awareness activities to assist in identifying young homeless children. However, access to preschool for homeless children is not fully addressed in the plan.
<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 State's plan would be strengthened if the SEA were to describe specific procedures that outline how homeless preschool-aged children, once identified, are made aware of public preschool availability, and assisted with enrolling in such programs. Additionally, a description of how this protocol is monitored would be of benefit.

- **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>	Peer reviewers observed that the SEA is engaged in training LEA staff to ensure that homeless youth and youth separated from school are receiving appropriate credit for coursework. Additionally, the SEA is developing materials to assist school counselors in addressing barriers to credit accrual. However, the plan did not discuss in detail how existing (or proposed) policies address the topic of full or partial credit.
<i>Strengths</i>	Peer reviewers noted strengths in the State plan's discussion of training local liaisons on the identification of youth separated from school, and partnering with Title I, Part A to provide online courses, summer school, and credit recovery.
<i>Limitations</i>	Peer reviewers noted that training for school counselors to assist with the assignment of partial credit is still in development (with no timeline referenced) and that, while the plan makes a general reference to State, local and school policies regarding full or partial credit, there wasn't specific information about whether such policies exist and what they contain.
<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 State's plan would be strengthened by the discussion of existing (or proposed) State and local policies regarding credit accrual, as well as how local policies are reviewed to ensure compliance.

- **Does the SEA describe procedures that ensure that homeless children and youth who meet the relevant eligibility criteria do not face barriers to accessing academic and extracurricular activities, including magnet school, summer school, career and technical education, advanced placement, online learning, and charter school programs, if such programs are available at the State and local levels?**

	<i>Peer Response</i>
<i>Peer Analysis</i>	The peer reviewers observed that the SEA has developed practices to ensure that homeless children and youth can access extracurricular activities. However, it was also noted that the narrative in this section is general in nature and did not include detail about policies addressing the academic programs listed in the requirement.
<i>Strengths</i>	Strengths noted in the State’s plan include the SEA’s coordination with the State athletic association to ensure access and opportunity for homeless students. Additionally, the SEA requires LEAs to develop policies regarding participation of homeless students in extracurricular activities. Finally, it was noted that LEAs conduct outreach to community resources to address the needs of students who wish to participate in extracurricular activities.
<i>Limitations</i>	Peer reviewers indicated that the State’s plan did not describe how it will monitor homeless students access to extracurricular activities, and did not mention specific policies to address the listed programs (magnet school, summer school, career and technical education), or specific procedures to be followed to ensure access and participation.
<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 stated that the plan should address how the SEA will review and update State and local policies impacting access to and participation in each of the listed academic programs – magnet school, summer school, career and technical education, advanced placement, online learning and charter school programs.

**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>	Peer reviewers observed that the SEA has a comprehensive and wide-ranging set of strategies to limit enrollment delays for children and youth experiencing homelessness, including the requirement for a needs assessment to identify local issues. However, it was also noted that the plan could include more specific narrative regarding procedures to address the issues listed within the indicator that contribute to enrollment delays.
<i>Strengths</i>	Peer reviewers noted the fact that the SEA prohibits LEAs from denying enrollment due to lack of records, has a standard Title I-A set-aside for services to homeless youth that may be used to minimize enrollment delays, and requires that a needs assessment be completed for the Title I-A set-aside. Also, the reviewers noted that LEAs requiring school uniforms must provide uniforms to homeless and foster youth, and that the SEA works with the Idaho Volunteer Lawyers Program to assist liaisons and youth.
<i>Limitations</i>	Reviewers observed that, while the SEA provided information on a wide variety of strategies and mechanisms to assist families and youth with enrollment delays, specific information on delays tied to residency and guardianship were not provided. Additionally, reviewers noted that more specific information is needed regarding procedures to obtain the various documents listed – such as immunization, birth certificates, and school records. Finally, reviewers noted that the plan provided discussion of the assistance LEAs will receive to ensure that the needs assessment process yields valid and usable data.
<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 indicated that the State’s plan could be strengthened by clearly addressing how the SEA responds to barriers caused by residency requirements and guardianship issues. Additionally, reviewers noted that more specific information is needed regarding how the following documents are obtained – immunization, birth certificates, and school records.

**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>	Peer reviewers observed that the State’s plan articulated a general process to review and monitor LEA policies that impact the identification, enrollment and retention of homeless children due to fees, fines and absences, but that a more specific process for reviewing and updating policies could be described.
<i>Strengths</i>	Peer reviewers saw strengths in the plan’s discussion of training and technical assistance to LEAs on the statutory provisions related to fees, fines, and absences. It was also noted that the SEA includes indicators related to this provision of the statute in its federal program monitoring process and that the SEA requires LEAs to have local board policies with clear requirements about the identification of homeless children and youth and the barriers referenced in this requirement.
<i>Limitations</i>	Reviewers noted that more description could be provided regarding barriers to identification, enrollment and retention, and that the plan did not describe a process to review State level policies.
<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>	Peer reviewers indicated that the State’s plan could be strengthened by specific discussion of the policies related to barriers to identification, enrollment and retention. Additionally, reviewers noted that the plan could describe a process to review State and local policies to identify those in need of 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?**

	<i>Peer Response</i>
<i>Peer Analysis</i>	Peer reviewers observed that the SEA has established procedures to ensure that homeless children and youth will receive college preparatory assistance from school counselors. The plan was specific regarding information and support that homeless youth should receive from school counselors and training that will be provided to assist counselors with their responsibilities.
<i>Strengths</i>	Peer reviewers saw strengths in the plan’s inclusion of a monitoring indicator to address counseling support for unaccompanied homeless youth and in the increased training provided for school counselors on the requirements of McKinney-Vento. Additionally, the State requires that homeless youth be informed of their status and of the available assistance.
<i>Limitations</i>	Peer reviewers noted that, based on the narrative provided by the SEA, it appears that many of the activities to support the preparation and readiness of unaccompanied youth for college are not fully in place. Additionally, reviewers indicated that the plan could provide more detail on the training of counselors, how they will be encouraged to attend trainings and how participation will be monitored. Finally, reviewers noted that data are not provided as to the extent to which readiness for college or access to financial aid is a problem and, if so, which aspects need to be addressed.
<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>	