

STATE PLAN

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

State Name: Illinois



U.S. Department of Education

June 29, 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>	The peer review panel agreed that the SEA described procedures that it will use to identify homeless children and youth in the State and to assess their individual needs.
<i>Strengths</i>	The peer review panel observed that strengths in the plan include: references to a common form for enrollment, training related to identification for liaisons, and practices to identify other children in families who may need services. Resources and links to assist LEAs are located on the SEA’s website. The SEA trains LEA liaisons to work with HUD Continuum of Care providers. The SEA also designates Lead Area Liaisons (LALs) who provide training and technical assistance to liaisons and other LEA staff covered by their region.
<i>Limitations</i>	<p>One peer reviewer noted that since national data suggest that fewer than 20% of students identified qualify under HUD rules, coordination beyond the Continuum of Care providers should be addressed. Moreover, while the “common form” can capture needs, the plan does not describe how needs are assessed. Furthermore, there is no reference to a systemic assessment of needs conducted at the State level.</p> <p>Based on the peer review, it is recommended that the SEA articulate clearer procedures for systematically analyzing various kinds of information to improve the identification of homeless children and youth in the State and the assessment of their needs at a statewide systemic level.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3) reviewers <input type="checkbox"/> No
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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>	The peer review panel observed this item needed revision because the dispute resolution procedures in State code do not mention school selection nor do they provide procedures for the prompt resolution of disputes at the LEA or SEA level.
<i>Strengths</i>	The peer review panel observed that ombudspersons must be familiar with McKinney-Vento educational rights and must complete an annual training. The dispute process is referenced in State code. Training is provided to liaisons.
<i>Limitations</i>	The peer review panel noted that the local dispute process appears to be determined by one person rather than a panel of individuals. State appeals to be resolved by the State Superintendent address disputes that are inconsistent with law; however, many disputes are subjective and not compliance matters. State statute and procedures described in this plan do not include specific timelines to meet the “prompt resolution” requirement. There is no description of how parents/youth can appeal a decision and there are no timelines to ensure prompt resolution. The plan refers to disputes regarding eligibility and “issues related to homelessness” but these “issues” are not specified. It is unclear what the actual dispute process is at any level or if this varies by locality and region.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes <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>	The peer review panel observed this description did not meet this requirement due to the missing mention of school selection as grounds for dispute, lack of procedures for prompt resolution of disputes, and lack of clarity about the steps from the LEA to the SEA for an appeal process. Since amending State code can take many months, the SEA could describe its process and timeline for amending this code as a means for satisfactorily meeting 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?**

	<i>Peer Response</i>
<i>Peer Analysis</i>	While the peer review panel observed the requirement was met, the description provided by the SEA could be improved by better describing the training and awareness programs for various kinds of school personnel.
<i>Strengths</i>	The plan stated that all school personnel gain understanding through trainings conducted by the regional Lead Area Liaisons and local liaisons. The SEA has a network of professionals who provide training and technical assistance to LEAs to heighten awareness of the specific needs of homeless children and youth. Training of school counselors was specifically mentioned as a strength of the plan.
<i>Limitations</i>	The peer review panel noted that the description of the trainings and who are trained is vague. There was one reference to the state coordinator overseeing training. There was no reference to the new mandate that all liaisons be trained and that the state coordinator guides that training. The SEA did not describe how the training of staff from every LEA and representing particular educational roles is tracked and monitored. Support for youth was described but how their needs are built into awareness activities was unclear. The SEA could improve the plan by describing the following for its programs: <ul style="list-style-type: none"> • identify personnel that will be targeted; • articulate the role of the SEA in supporting the creation of the training and resources liaisons; • provide examples of venues (e.g., regional organizations and conferences) that the SEA will use to heighten awareness.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3) reviewers <input type="checkbox"/> No
<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>	The peer review panel agreed that the SEA described procedures that ensure that homeless children have access to public preschool programs.
<i>Strengths</i>	The peer review panel observed that the plan describes practices that improve identification of young children, a process to prioritize enrollment in early childhood programs, liaison responsibility to assist with Head Start access, and use of enrollment data to monitor progress. The SEA has a “Preschool for All” initiative that provides early screening and services for children aged 3-5 years. Children at risk of school failure due to environmental or developmental delays are prioritized for services, and this subgroup includes many young children experiencing housing instability. If program slots are open, homeless students must be immediately enrolled. When slots are not available, these children are placed at the top of the waiting list. Data is collected on participants in SEA preschool programs.
<i>Limitations</i>	The peer review panel noted that there was no direct reference to the role of the State coordinator or collaboration at the State level. There was also no description of training provided to early childhood program staff to understand McKinney-Vento. The SEA could describe its role in statewide coordination and training of collaborators.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3) reviewers <input type="checkbox"/> No
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

- **Does the SEA describe procedures that ensure that homeless youth and youth separated from public schools are identified and accorded equal access to appropriate secondary education and support services, including by identifying and removing barriers that prevent youth described in this clause from receiving appropriate credit for full or partial coursework satisfactorily completed while attending a prior school, in accordance with State, local, and school policies?**

	<i>Peer Response</i>
<i>Peer Analysis</i>	While the topic of receiving credit for full or partial credit for coursework was mentioned and 2 peer reviewers observed the requirement was met, one member of the peer review panel could not find SEA procedures that ensure this requirement was met, including for youth separated from public school.
<i>Strengths</i>	The peer review panel observed that identification procedures involving collaboration with agencies serving unaccompanied homeless youth were mentioned. The plan referenced youth and credit accrual by stating that liaisons must ensure full or partial credit transfer. The plan referenced data collection on achievement and graduation rates.
<i>Limitations</i>	The peer review panel observed that no actual SEA procedures were described. No data were provided. Youth separated from school also were not 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>	The SEA should describe its own specific procedures for according equal access to appropriate secondary education and support services for homeless youth both in and out of school. Also, specific procedures need to be clarified about removing barriers to receiving appropriate credit for full or partial coursework satisfactorily completed while attending a prior school.

- **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 review panel agreed that the SEA did not describe procedures that meet this requirement.
<i>Strengths</i>	The peer review panel observed that some information on barriers to extracurricular activities is provided and the plan states that Illinois law includes procedures to eliminate barriers, although no procedures are described.
<i>Limitations</i>	The peer review panel observed that the SEA only referred to legal requirements and did not describe specific procedures to address academic and extra-curricular activities.
<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>	The SEA should describe actual procedures in place to assist homeless students in accessing academic and extracurricular activities, for example, through training, monitoring, data analysis, or policy revision.

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>	The majority of the peer review panel agreed that the SEA did not describe SEA strategies that address all of the problems mentioned in this item.
<i>Strengths</i>	The peer review panel observed that there were references to immediate enrollment and to Lead Area Liaisons requiring training for local liaisons on immediate enrollment requirements. Also, Title I was listed as a funding source for uniforms.
<i>Limitations</i>	The peer review panel noted that there was no description of actual SEA strategies to address these barriers with the exception of uniform or dress code requirements being addressed by LEA or Lead Area Liaisons or that Title I, Part A funds may be used to remove that barrier. For example, there was no information on State analyses of data/monitoring that explore the impact of these barriers and what is or is not working.
<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>	The SEA should describe more specific strategies and ensure that all topics listed in i-v are addressed by at least one strategy mentioned.

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>	The peer review panel agreed that the SEA did not demonstrate that it met this requirement.
<i>Strengths</i>	The peer review panel observed that ISBE policy requires LEAs to review their own policies.
<i>Limitations</i>	The peer review panel noted that there was no reference to the State reviewing and revising its own policies, including for fees, fines, and absences.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes <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>	The SEA should describe specific policies that it has developed, reviewed and/or revised. If these topics will be addressed primarily through monitoring and technical assistance, the SEA should describe how this relates to developing, reviewing and/or revising its policies and LEA policies.

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>	The SEA did not respond in a specific section, however, some mention of how homeless youth will receive assistance from counselors to advise them to prepare and improve their readiness for colleges was referenced in a few parts of the plan.
<i>Strengths</i>	The peer review panel observed that counselors and liaisons receive training in the requirements of the McKinney-Vento Act including requirements to inform unaccompanied homeless youth of their independent student status for the FAFSA.
<i>Limitations</i>	Though the State plan states that LEA liaisons must work with counselors to ensure that unaccompanied homeless youth receive college counseling, the peer review panel observed that limited information was included about the training and support counselors will receive to execute this responsibility. The SEA could be more explicit in its own role in ensuring that homeless youth receive assistance from counselors to prepare and improve their readiness for college.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3) reviewers <input type="checkbox"/> No
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	