



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

December 13, 2017

The Honorable Randy Watson
Commissioner of Education
Kansas Department of Education
900 S.W. Jackson Street, Room 600
Topeka, KS 66612-1220

Dear Commissioner Randy Watson:

Thank you for submitting Kansas's consolidated State plan to implement requirements of covered programs under the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESSA), and of the amended McKinney-Vento Homeless Assistance Act (McKinney-Vento Act).

I am writing to provide initial feedback based on the U.S. Department of Education's (the Department's) review of your consolidated State plan. As you know, the Department also conducted, as required by the statute, a peer review of the portions of your State plan related to ESEA Title I, Part A, ESEA Title III, Part A, and the McKinney-Vento Act using the Department's *State Plan Peer Review Criteria* released on March 28, 2017. Peer reviewers examined these sections of the consolidated State plan in their totality, while respecting State and local judgments. The goal of the peer review was to support State- and local-led innovation by providing objective feedback on the technical, educational, and overall quality of the State plan and to advise the Department on the ultimate approval of the plan. I am enclosing a copy of the peer review notes for your consideration.

Based on the Department's review of all programs submitted under Kansas's consolidated State plan, including those programs subject to peer review, the Department is requesting clarifying or additional information to ensure the State's plan has met all statutory and regulatory requirements, as detailed in the enclosed table. Each State has flexibility in how it meets the statutory and regulatory requirements. Please note that the Department's feedback may differ from the peer review notes. I encourage you to read the full peer notes for additional suggestions and recommendations for improving your consolidated State plan.

ESEA section 8451 requires the Department to issue a written determination within 120 days of a State's submission of its consolidated State plan. Given this statutory requirement, I ask that you revise Kansas's consolidated State plan and resubmit it through OMB Max by December 28, 2017. We encourage you to continue to engage in consultation with stakeholders, including representatives from the Governor's office, as you develop and implement your State plan. If you would like to take more time to resubmit your consolidated State plan, please contact your Office of State Support Program Officer in writing and indicate your new submission date.

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The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.

Please recognize that if we accommodate your request for additional time, a determination on the ESEA consolidated State plan may be rendered after the 120-day period.

Department staff will contact you to support Kansas in addressing the items enclosed with this letter. If you have any immediate questions or need additional information, I encourage you to contact your Program Officer for the specific Department program.

Please note that the Department only reviewed information provided in Kansas's consolidated State plan that was responsive to the Revised Template for the Consolidated State Plan that was issued on March 13, 2017. Each State is responsible for administering all programs included in its consolidated State plan consistent with all applicable statutory and regulatory requirements. Additionally, the Department can only review and approve complete information. If Kansas indicated that any aspect of its plan may change or is still under development, Kansas may include updated or additional information in its resubmission. Kansas may also propose an amendment to its approved plan when additional data or information are available consistent with ESEA section 1111(a)(6)(B). The Department cannot approve incomplete details within the State plan until the State provides sufficient information.

Thank you for the important work that you and your staff are doing to support the transition to the ESSA. The Department looks forward to working with you to ensure that all children have the opportunity to reach their full potential.

Sincerely,

/s/

Jason Botel
Principal Deputy Assistant Secretary,
Delegated the authority to perform the
functions and duties of the position of
Assistant Secretary, Office of
Elementary and Secondary Education

Enclosures

cc: Governor
State Title I Director
State Title II Director
State Title III Director
State Title IV Director
State Title V Director
State 21st Century Community Learning Center Director
State Director for McKinney-Vento Homeless Assistance Act: Education for Homeless
Children and Youths Program

Items That Require Additional Information or Revision in Kansas’s Consolidated State Plan

Title I, Part A: Improving Basic Programs Operated by Local Educational Agencies (LEAs)	
A.4.iii.c.1: English Language Proficiency Long-term Goals	<ul style="list-style-type: none"> • The ESEA requires a State to describe the State-determined timeline for English learners to achieve English language proficiency. In its State plan, the Kansas State Department of Education (KSDE) does not provide a State-determined timeline for English learners to achieve English language proficiency. • KSDE provides in its State plan baseline data for the 2016-2017 school year for its long-term goal for progress towards English language proficiency, but in Appendix C, indicates that the baseline data is Not Applicable. Although the State has discretion regarding which year of data to use as its baseline and may update its baseline data following administration of the English language proficiency assessment in the 2017-2018 school year, it is unclear whether KSDE meets the statutory requirements.
A.4.iii.c.2: Measurements of interim progress	<p>In its State plan, KSDE indicates that its measurements of interim progress are to be determined. The ESEA requires the State to establish measurements of interim progress for the percentage of English learners making progress in achieving English language proficiency.</p>
A.4.iv.a: Academic Achievement Indicator	<ul style="list-style-type: none"> • ESEA section 1111(c)(4)(E)(ii) requires a State to calculate the Academic Achievement indicator by including in the denominator the greater of 95% of all students (or 95% of all students in a subgroup) or the number of students participating in the assessments. In its State plan, KSDE indicates that it monitors participation rates across the State but does not address the calculation of the Academic Achievement indicator. Accordingly, it is not clear whether KSDE is meeting the requirement in ESEA section 1111(c)(4)(E)(ii). • In its State plan, KSDE proposes to calculate every three years whether a school exceeds, meets, or is below expectations. Although the State may average data across years, the ESEA requires the State to annually measure each school’s performance on the Academic Achievement indicator for all students and each subgroup of students. Because KSDE does not describe that the indicator will be measured annually nor how the indicator will be factored into the system of annual meaningful differentiation, it is not clear whether KSDE has met this requirement.
A.4.iv.b: Other Academic Indicator for Elementary and Secondary Schools that are Not High Schools	<ul style="list-style-type: none"> • The ESEA requires a State to describe an indicator for public elementary and secondary schools that are not high schools (i.e., the Other Academic indicator) that includes, at the State’s discretion, a measure of student growth or another valid and reliable statewide academic indicator that allows for meaningful differentiation in school performance. While

	<p>KSDE provides general information for this indicator, it does not provide sufficient information regarding how the indicator rating is determined, such as a description of the eight Assessment Performance Index levels, goals against which schools will be evaluated as having met, exceeded, or been below expectations, or how the indicator meaningfully differentiates among schools, in order to determine whether KSDE meets the statutory requirements.</p> <ul style="list-style-type: none"> • The ESEA requires that a State measure, for all public elementary schools and secondary schools that are not high schools, an Other Academic indicator that includes the performance of all students and each subgroup of students. Because KSDE’s State plan indicates that it will only include in this indicator subgroups of students with a gap greater than 1.5 standard deviations from the mean, it is not clear whether KSDE has met this requirement. • In addition, KSDE proposes that it will calculate every three years whether the school exceeds, meets, or is below expectations. Although the State may average data across years, the ESEA requires the State to annually measure each elementary and middle school’s performance on the Other Academic indicator for all students and each subgroup of students. Additionally, KSDE does not describe how this indicator will be factored into the system of annual meaningful differentiation. As a result, it is not clear whether KSDE has met this requirement.
<p>A.4.iv.c: Graduation Rate Indicator</p>	<p>KSDE indicates that it will calculate every three years whether the school exceeds, meets, or is below expectations with respect to performance on the Graduation Rate indicator. Although the State may average data across years, the ESEA requires the State to annually measure each high school’s performance on the Graduation Rate indicator for all students and each subgroup of students. Because KSDE does not describe that the indicator will be calculated annually, how it averages data over three years, or how the indicator will be factored into the system of annual meaningful differentiation, it is not clear whether KSDE has met this requirement.</p>
<p>A.4.iv.d: Progress in Achieving English Language Proficiency Indicator</p>	<ul style="list-style-type: none"> • Consistent with the April 10, 2017, Dear Colleague Letter that provided additional flexibility, each State must fully implement its accountability system, including all required indicators, to identify schools by the beginning of the 2018-2019 school year. Because KSDE indicates in its State plan that it will report results on its Progress in Achieving English Language Proficiency indicator for the first time in 2019, it appears that KSDE’s proposed timeline for fully implementing its accountability system does not meet this requirement. • KSDE indicates that it will calculate every three years whether the school meets or is below expectations, and that those determinations will be based on the interim progress measures.

	<p>Although the State may average data across years, the ESEA requires the State to annually measure each school’s performance on the Progress in Achieving English Language Proficiency indicator for all English learners. Because KSDE does not describe that the indicator will be calculated annually, the measurements of interim progress against which it will evaluate school performance, or how this indicator will be factored into the system of annual meaningful differentiation, it is not clear whether KSDE has met this requirement.</p>
<p>A.4.iv.e: School Quality or Student Success Indicator(s)</p>	<ul style="list-style-type: none"> • The ESEA requires a State to annually measure and describe in its State plan a statewide School Quality or Student Success indicator that is valid and reliable and allows for meaningful differentiation in school performance. Although KSDE provides general information for this indicator, it does not provide sufficient information regarding how the indicator rating is determined, such as a description of the eight Assessment Performance Index levels and how they are valid and reliable measures, how performance on the indicator is calculated to determine whether schools have met, exceeded, or been below expectations, or how the indicator meaningfully differentiates among schools, in order to determine whether KSDE meets the statutory requirements. • KSDE indicates that it will calculate every three years whether a school exceeds, meets, or is below expectations. Although the State may average data across years, the ESEA requires the State to annually measure each school’s performance on the School Quality or Student Success indicator for all students and each subgroup of students.
<p>A.4.v.a: State’s System of Annual Meaningful Differentiation</p>	<ul style="list-style-type: none"> • The ESEA requires a State to establish and describe in its State plan its system of annual meaningful differentiation, including a description of how the system is based on all indicators, for all students and all subgroups of students. In describing its system of annual meaningful differentiation in its State plan, KSDE indicates that it “will rely on data, including A+, graduation, academic measure (API and Gap), as well as progress of English learners, to determine support and improvement needs in districts across Kansas.” Based on this statement, it is unclear whether or how KSDE considers school performance on all indicators in its system of annual meaningful differentiation. Further, the State does not describe the A+ index or how this measure is included in its system of annual meaningful differentiation. As a result, it is unclear whether KSDE is meeting the statutory requirements. • The ESEA requires each State to meaningfully differentiate all public schools in the State on an annual basis. KSDE commits to reporting on school progress against long-term goals and measurements of interim progress annually, but indicates that it will determine if schools are below, meeting, or exceeding expectations on each indicator in its accountability system once

	<p>every three years.</p> <ul style="list-style-type: none"> • In its State plan, KSDE indicates that virtual schools and stand-alone alternative schools will be excluded from its system of annual meaningful differentiation. However, the ESEA requires that a State’s system of annual meaningful differentiation apply to “all public schools in the State.”
<p>A.4.v.b: Weighting of Indicators</p>	<p>The ESEA requires a State to describe the weighting of each indicator in its system of annual meaningful differentiation, including that the Academic Achievement, Other Academic, Graduation Rate, and Progress in Achieving English Language Proficiency indicators each receive substantial weight individually; and that those indicators receive, in the aggregate, much greater weight than the School Quality or Student Success indicator(s), in the aggregate. Although KSDE explains how it will take into consideration both a school’s performance on the Assessment Performance Index (API) at a weight of 60% and a school’s chronic absence rate and percentage of students suspended or expelled (together carrying a weight of 40%), the description KSDE provided in its State plan is not sufficient to determine whether the State meets the statutory requirements. Specifically, it is unclear:</p> <ul style="list-style-type: none"> • How each indicator (Academic Achievement, Other Academic, Graduation Rate, and Progress in Achieving English Language Proficiency, School Quality or Student Success) is weighted in KSDE’s overall risk index. • Whether KSDE proposes to include chronic absence and percentage of students suspended or expelled as School Quality or Student Success indicators. If so, a description is needed to determine that each meets the requirements for a School Quality or Student Success indicator. • How a school’s overall risk index is used for annual meaningful differentiation (i.e., determining whether schools are identified for Comprehensive Support and Improvement, Targeted Support and Improvement, or Universal Support and Improvement).
<p>A.4.vi.a Comprehensive Support and Improvement Schools— Lowest Performing</p>	<ul style="list-style-type: none"> • The ESEA requires a State to identify for comprehensive support and improvement, based on all indicators in its system of annual meaningful differentiation, not less than the lowest-performing five percent of all schools receiving Title I, Part A funds. In the Weighting of Indicators section, the State indicates that it weights the Assessment Performance Index (API) at 60 percent and that it weights chronic absenteeism and percentage of suspended or expelled at 40 percent. In the Comprehensive Support and Improvement Schools section, the State indicates that it will weight performance on the Kansas State Assessment at 60 percent and chronic absenteeism and the percentage of students suspended or expelled at 40 percent. Because it is unclear whether the API is the Academic Achievement indicator, as required by

	<p>statute, or if KSDE intends to use all other indicators for annual meaningful differentiation, it does not appear that KSDE meets this requirement.</p> <ul style="list-style-type: none"> • KSDE indicates in its State plan that it identified schools for comprehensive support and improvement for the first time in 2016. Consistent with Secretary’s April 10, 2017 letter provided States with additional flexibility regarding the timeline for identifying schools, KSDE must modify its methodology for identifying schools for comprehensive support and improvement and identify such schools in accordance with the statutory requirements by the beginning of the 2018-2019 school year and at least every three years thereafter.
<p>A.4.vi.b: Comprehensive Support and Improvement Schools—Low Graduation Rates</p>	<ul style="list-style-type: none"> • In its State plan, KSDE indicates that it will report through its statewide dashboard any schools identified as graduating less than 67 percent of all students or any subgroup of students beginning in 2019. This does not meet the requirement, consistent with the Secretary’s April 2017 Dear Colleague letter that provided additional flexibility, for a State to identify schools for comprehensive support and improvement by the beginning of the 2018-2019 school year. • The ESEA requires that a State identify for comprehensive support and improvement any public high schools failing to graduate one-third or more of their students. Although KSDE indicates that schools with four-year adjusted cohort graduation rates below 67 percent will be eligible for comprehensive support and improvement, it is unclear whether such schools will be identified for comprehensive support and improvement in accordance with the statute.
<p>A.4.vi.c: Comprehensive Support and Improvement Schools—Additional Targeted Support Not Exiting Such Status</p>	<p>The ESEA requires a State to describe its methodology to identify schools for comprehensive support and improvement that have received additional targeted support and improvement and have not satisfied the statewide exit criteria within a State-determined number of years. KSDE does not describe its methodology for identifying such schools in its State plan, but rather mentions how targeted support and improvement “consistently underperforming” subgroup schools that have not satisfied the exit criteria within a State-determined number of years will be eligible for comprehensive support and improvement. Additionally, KSDE’s proposed methodology, which caps the number of schools in this category, could result in the exclusion of some schools that require comprehensive support and improvement after receiving additional targeted support and improvement but fail to satisfy the exit criteria.</p>
<p>A.4.vi.d: Frequency of Identification</p>	<p>The ESEA requires a State to identify schools for comprehensive support and improvement at least once every three years and to describe in its State plan the frequency with which it will identify schools for comprehensive support and improvement, consistent with that requirement. The timeline KSDE outlined in its State plan would not result in identification of comprehensive</p>

	<p>support and improvement lowest-performing schools every three years. Specifically, the State indicates that it identified such schools for the first time in fall 2016 and intends to identify the next cohort of schools in fall 2020. As noted in A.4.vi.a, once KSDE modifies its methodology for identifying schools for comprehensive support and improvement to identify such schools in accordance with the statutory requirements, it must identify such schools by the beginning of the 2018-2019 school year and not less than every three years thereafter.</p>
<p>A.4.vi.e: Targeted Support and Improvement Schools— “Consistently Underperforming” Subgroups</p>	<ul style="list-style-type: none"> • The ESEA requires a State to describe a methodology for identifying schools with one or more consistently underperforming subgroups that considers performance on all indicators in the statewide system of annual meaningful differentiation. KSDE proposes a methodology that only considers the Assessment Performance Index, rather than all indicators, as required by the statute. • The ESEA requires a State to indicate that the State will identify schools with one or more consistently underperforming subgroups annually. KSDE’s State plan is inconsistent, indicating in one section that it will identify schools with one or more consistently underperforming subgroups annually and in another section that it will identify such schools once every three years. • KSDE indicates in its State plan that it will identify schools for targeted support and improvement from among schools in the State receiving Title I, Part A funds. The ESEA requires a State to identify schools with one or more consistently underperforming subgroups of students from among all public schools in the State. • The ESEA requires that a State annually identify schools with one or more consistently underperforming subgroups of students for targeted support and improvement. Although KSDE indicates that schools that meet its criteria for having one or more consistently underperforming subgroups “will be identified as schools eligible for targeted support and improvement,” the State does not commit to identifying such schools for targeted support and improvement.
<p>A.4.vi.f: Targeted Support and Improvement Schools— Additional Targeted Support</p>	<ul style="list-style-type: none"> • The ESEA requires that a State describe its methodology for identifying schools in which any subgroup of students, on its own, would lead to identification under ESEA section 1111(c)(4)(D)(i)(I) using the State’s methodology under ESEA section 1111(c)(4)(D). The methodology proposed in KSDE’s plan for identification of schools for additional targeted support does not meet this requirement, as it seems to describe how schools previously identified for comprehensive support and improvement that do not exit that status will become eligible for “Intense Support and Improvement” services.

	<ul style="list-style-type: none"> • In its State plan, KSDE indicates that it will begin identifying schools for additional targeted support in 2020; this timeline for identifying schools does not meet the requirement, consistent with the Secretary’s April 2017 Dear Colleague letter that provided additional flexibility, for a State to identify schools for additional targeted support and improvement by the beginning of the 2018-2019 school year.
<p>A.4.viii.d: Resource Allocation Review</p>	<p>The ESEA requires a State to describe how it will periodically review resource allocation to support school improvement in each LEA in the State serving a significant number or percentage of schools identified for comprehensive or targeted support and improvement. Although KSDE commits to conducting a resource allocation review, the State does not provide a description of how this review will be conducted.</p>
<p>A.5: Disproportionate Rates of Access to Educators</p>	<p>Although KSDE describes disproportionate rates of access to inexperienced and out-of-field teachers for some schools, KSDE does not specifically address how low-income and minority children are served by inexperienced and out-of-field teachers in schools assisted under Title I, Part A. Additionally, KSDE does not describe disproportionate rates of access to ineffective teachers in its State plan. The ESEA requires a State to describe the extent, if any, that low-income and minority children enrolled in schools assisted under Title I, Part A are served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers.</p>
<p>Title I, Part C: Education of Migratory Children</p>	
<p>B.1: Supporting Needs of Migratory Children</p>	<ul style="list-style-type: none"> • KSDE describes how, in planning and implementing the Migrant Education Program (MEP), it will address the unique educational needs of migratory children, including preschool migratory children and migratory children who have dropped out of school, through the full range of services that are available for migratory children from appropriate local, State, and Federal educational programs. However, the ESEA requires that a State also describe how it will evaluate the MEP in the area described above, to ensure the unique educational needs of migratory children are addressed. • The ESEA requires a State to describe how, in planning, implementing, and evaluating the MEP, it will address the unique educational needs of migratory children, including preschool migratory children and migratory children who have dropped out of school, through joint planning among local, State, and Federal educational programs serving migratory children, including language instruction educational programs under Title III, Part A; and through the integration of services available under Title I, Part C with services provided by those other programs. KSDE does not provide sufficient information to meet this requirement.

Title II, Part A: Supporting Effective Instruction	
D.5: Data and Consultation	In its State plan, KSDE provides a list of advising partners with which it will engage in ongoing consultation regarding activities supported under Title II, Part A. However, it is unclear if this list includes members of all required stakeholder groups, consistent with ESEA section 2101(d)(3), which includes teachers, principals, other school leaders, paraprofessionals (including organizations representing such individuals), specialized instructional support personnel, charter school leaders (in a State that has charter schools), parents, community partners, and other organizations or partners with relevant and demonstrated expertise in programs and activities designed to meet the purpose of Title II, Part A.
Title IV, Part A: Student Support and Academic Enrichment Grants	
F.1: Use of Funds	The ESEA requires a State to describe how it will use funds received under Title IV, Part A, Subpart 1 for State-level activities, and clarify which of the State-level activities will be supported in whole or in part by Title IV, Part A funds. In its State plan, KSDE does not describe how it will use funds received under Title IV, Part A for State-level activities.
F.2: Awarding Subgrants	The ESEA requires a State plan to include a description of how the SEA will ensure that awards made to LEAs under Title IV, Part A, Subpart 1 are in amounts that are consistent with ESEA section 4105(a)(2), including how the SEA will comply with the ratable reduction requirement in 4015(b). The ESEA does not allow States to require LEAs to form a consortium in order to receive a Title IV, Part A, Subpart 1 subgrant and the state must revise accordingly. KSDE does not include a description of how the SEA will ensure that awards made to LEAs are consistent with this requirement, including that KSDE will not award grants less than \$10,000.
Title IV, Part B: 21st Century Community Learning Centers	
G.1: Use of Funds	KSDE describes how it will collaborate with other state and Federal programs to provide services and activities to support the whole child, but does not describe how it will use funds reserved for “State activities” (SEAs may reserve up to five percent of program funds for State-level activities and up to two percent for administration). The ESEA requires that a State describe the State activities it will carry out under the program, which may include monitoring and evaluating programs; providing capacity building, training, and technical assistance; conducting a comprehensive evaluation of the effectiveness of programs; providing training and technical assistance to applicants or recipients; ensuring activities are aligned with external organizations, if available; working with stakeholders to review and improve State policies to improve program implementation; coordinating funds with other Federal and State funds; and/or providing a list of pre-screened external organizations.

Education for Homeless Children and Youths Program, McKinney-Vento Homeless Assistance Act, Title VII, Subtitle B	
I.3: Support for School Personnel	<p>In its State plan, KSDE describes training and outreach by LEA liaisons, with support from the SEA, for school personnel to heighten the awareness of such school personnel of the needs of homeless children and youth. It is not clear, however, if these activities will heighten the awareness of such school personnel of the specific needs of <i>runaway and homeless children and youth</i>. The McKinney-Vento Act requires the State to 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 <i>runaway and homeless children and youth</i>.</p>
I.4: Access to Services	<ul style="list-style-type: none"> • In its State plan, KSDE does not include any SEA procedures that ensure that <i>youths separated from public schools</i> are identified and accorded equal access to appropriate secondary education and support services, including removing barriers that prevent them from receiving appropriate credit for full or partial coursework satisfactorily completed while attending a prior school, in accordance with State, local, and school policies. The McKinney-Vento Act requires a State to describe procedures that ensure that homeless youth and youth separated from public schools are accorded equal access to appropriate secondary education and support services, including removing barriers that prevent them 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>Requirement I.4ii</i>) • In its State plan, KSDE discusses training for liaisons to 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, and charter school programs. KSDE does not, however, describe procedures that ensure that homeless children and youth who meet the relevant eligibility criteria do not face barriers to accessing online learning, if such programs are available at the State and local levels. The McKinney-Vento Act requires the State to 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 online learning, if such programs are available at the State and local levels. (<i>Requirement I.4iii</i>)
I.5: Strategies to Address Other Problems	<p>While KSDE provides strategies to address problems resulting from enrollment delays due to: (i) requirements of immunization and other required health records; (iii) lack of birth certificates,</p>

	<p>school records, or other documentation; and (v) uniform or dress code requirement, KSDE does not provide strategies to address problems resulting from enrollment delays that are caused by (ii) residency requirements or (iv) guardianship issues. The McKinney-Vento Act requires a State to provide strategies to address problems resulting from enrollment delays that are caused by: (ii) residency requirements or (iv) guardianship issues.</p>
<p>I.6: Policies to Remove Barriers</p>	<p>While KSDE indicates that training and guidance related to the enrollment and retention barriers to homeless children and youth are provided to LEAs, KSDE does not demonstrate that the SEA and LEAs have developed policies that they will review and revise to address specific barriers to enrollment and retention <i>due to outstanding fees or fines, or absences</i>. The McKinney-Vento Act requires the State to demonstrate how the SEA and LEAs in the State have developed, and shall review and revise, policies to remove barriers to the enrollment and retention of homeless children and youth in the State due to outstanding fees or fines, or absences.</p>