

STATE PLAN

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

State Name: Kansas



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 State’s plan provided a framework for the identification of homeless children and youth and addressed the assessment of student needs. Also, it was observed that the SEA collects data on student identification in LEAs and notifies local homeless liaisons of their duties to identify youth experiencing homelessness. However, it was noted that while the plan discussed identification and assessment, it did not provide detail about what is expected at the local level and how liaisons will be adequately prepared for their responsibilities.
<i>Strengths</i>	The peer reviewers identified strengths in the State plan’s description of the End of Year Accountability Report. Additionally, the State Coordinator informs liaisons of their duties and directs them to the National Center for Homeless Education resources on student identification and needs assessments for LEAs.
<i>Limitations</i>	It was noted that the State’s plan mentioned that many (but not all) LEAs have begun to assess the needs of their homeless student population through the residency questionnaire and other identifying factors. It was also noted that the SEA requires subgrantees to provide an annual evaluation concerning the identification and needs assessment for their identified homeless students, but this does not appear to apply to those LEAs who do not receive a McKinney-Vento subgrant. Additionally, reviewers noted that the plan did not discuss local activities that will be expected to ensure adequate and appropriate identification of homeless students, nor did it discuss ways that the State Coordinator will ensure that liaisons develop the knowledge and skills they need for good outreach and identification efforts. Reviewers also observed that it is unclear how the SEA reviews student identification data and what actions the SEA takes to assist LEAs with low identification rates.
<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</i>	It was indicated that the State plan could be strengthened with more detail about the training and assistance liaisons will receive regarding identification. This may include activities that all LEAs are

clarification that an SEA must provide to fully meet this requirement

expected to employ to identify homeless children and youth, and a discussion of how local procedures will be reviewed during monitoring.

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 State’s plan provided a description of the SEA’s homeless dispute resolution, with multiple levels of review and timelines.
<i>Strengths</i>	Reviewers identified strengths in the State plan’s description of the dispute resolution process, including the fact that while the local liaison is ultimately responsible for processing the dispute, the involvement of the SEA State Coordinator is evident. The dispute process addresses timelines, specific requirements for enrollment, and the need for transportation during the dispute. Reviewers also noted that the State Coordinator follows up after 30 days to determine the student’s status. Additionally, review of school-level decisions includes feasibility and best interest of the child, liaisons are required to maintain copies of written notifications, the SEA allows verbal notification of the desire to appeal for families, and the SEA uses a standard Dispute Resolution Form.
<i>Limitations</i>	It was noted that the State’s plan included little discussion of resources available to liaisons or how often liaisons receive training and updates on dispute resolution. Additionally, the plan noted that the State Coordinator has identified potential revisions to the process, but the plan did not include discussion of what will be done to make the needed changes.
<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.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>	Peer reviewers observed that the State’s plan outlined professional development through the use of webinars, in-person trainings, technical assistance via phone and email (with local liaisons being responsible for training at the LEA level), but participation appears to be at the individual’s discretion and no mechanisms were described to ensure that all liaisons and other school personnel have the knowledge required to implement the requirements of the statute.
<i>Strengths</i>	Peer reviewers saw strengths in the State plan’s description of the various methods used to provide professional development and technical assistance to LEAs, noting that the SEA provided a variety of free resources online, including resources from the National Center for Homeless Education. Additionally, the SEA plans to produce State-developed webinars on McKinney-Vento in an effort to increase outreach and training.
<i>Limitations</i>	Peer reviewers noted that it was unclear how the SEA will monitor attendance of its local liaisons and other school staff at trainings. The SEA encourages its LEAs to provide training for their staff (but mentions that some choose to bring their staff to local and national trainings). Reviewers noted that, while access to the National Center for Homeless Education and State-led webinars is a good step, the plan did not mention statewide or regional training, whether just for McKinney-Vento, or as part of a larger conference. Reviewers also noted that while local professional development targeted at specific groups is encouraged, the plan did not discuss how participation is monitored or how liaisons will be supported to facilitate this process.
<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 outlining how the SEA will confirm that all appropriate LEA staff members receive training. Additionally, the outline should address the runaway homeless student subgroup. Reviewers also recommended an expansion of SEA training opportunities by holding statewide or regional meetings, or by conducting sessions at existing State conferences.

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>	Peer reviewers observed that the State’s plan provided an assurance and described the procedures it has developed to address preschool programs for homeless children. However, it was unclear how these collaborations and the expectations for its LEAs will translate into access to public preschool for their homeless students.
<i>Strengths</i>	Peer reviewers saw strengths in the State plan’s discussion of collaborations developed among existing preschool programs. Reviewers noted that the State Coordinator works with SEA early childhood staff, as well as staff at the Kansas Department of Health and Environment and the Kansas Department of Children and Families, and LEAs are also expected to work with private preschool providers.
<i>Limitations</i>	Reviewers noted that the State’s plan focused on the McKinney-Vento State Coordinator to establish relationships and collaborations with its early childhood programs across the State, and that the plan did not describe how this will translate to compliance at the LEA level, or how this requirement will be monitored.
<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 peer reviewers indicated that the State plan could be strengthened by a description of how the SEA will ensure homeless children have access to public preschool programs. Further, it was noted that the plan would be improved by expanding on how extant collaborations translate into access for the homeless preschool population.

- **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 State’s plan did not describe procedures to ensure that homeless students will receive appropriate credit for full or partial coursework. While there was an assurance that students would receive appropriate credit for full or partial course work and a reference to State, local, and/or school policies that address this requirement, procedures to identify youths separated from public schools were not described. Reviewers noted that the SEA is actively engaged with stakeholders to address policies and procedures that impact full and partial credit accrual for homeless students.
<i>Strengths</i>	The peer reviewers saw strengths in the State plan’s reference to State and local laws and policies and the description of how the SEA is working with liaisons to develop more formal processes to address credit issues. It was also noted that the SEA works with the Kansas Association of School Boards to develop local policies and procedures that help remove barriers to credit accrual and is reviewing plans and policies from other States to strengthen its credit accrual policies. Finally, the plan articulated that students in the State may apply for early graduation when minimum credit requirements are met.
<i>Limitations</i>	Reviewers indicated that there the plan did not describe outreach and identification activities to be expected of all LEAs, or of available training or resources to support such activities. Finally, the plan did not describe a timeline or process for the development of local protocols or discuss whether these issues will be examined during SEA monitoring.
<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 outlining how the SEA will ensure homeless students receive appropriate credit for full or partial coursework satisfactorily completed while attending a prior school. Reviewers recommend that the SEA expand on policies and/or laws already in place at the State and local levels, and that a description of the procedures the SEA employs to help identify youth separated from public schools be included.

- **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>	Peer reviewers observed that the State’s plan did not describe procedures ensuring that homeless children and youth do not face barriers to accessing the programs listed in the requirement. The narrative for this requirement is more of an assurance, with a principal strategy of liaison training. Reviewers noted that the SEA works with partners to assist with supports for students to participate in extracurricular activities and provides training for LEA staff to address the items in the requirement.
<i>Strengths</i>	The peer reviewers identified strengths in the plan’s discussion of the training sessions provided by the State Coordinator to the Kansas State High School Athletics Association and local directors.
<i>Limitations</i>	Peer reviewers noted that the State’s plan did not describe procedures to be followed regarding access to academic programs, only that training is provided on the law. It was also noted that discussion of training focuses on liaisons and did not discuss training or other support provided to other school staff to ensure they have knowledge of the law and expected procedures. Reviewers also observed that it was unclear whether participation in academic and extracurricular programs is examined in monitoring and whether procedures are in place to remove barriers.
<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>	The peer reviewers indicated that the State plan could be strengthened by more specific discussion of current policies and procedures for ensuring access to academic programs and extracurricular activities, as well as a description of what will be done to ensure that areas needing attention are identified and addressed in removing barriers.

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 State’s plan referenced the Residency Law (ensuring attendance for all students residing in the State), but did not specifically address issues surrounding guardianship of homeless students. It was noted that the SEA described strategies involving work with attorneys and other SEA staff to address most barriers in the requirement, including the State statute that reduces barriers related to residency.
<i>Strengths</i>	Peer reviewers identified strengths in the plan including the State Coordinator’s coordination with other SEA staff to identify potential revisions to SEA policy. The State Coordinator has reviewed current laws, regulations, practices, and policies to ensure there are no barriers for homeless students. Additionally, the plan described the process for obtaining needed documents, and provided for immediate enrollment while documents are being obtained.
<i>Limitations</i>	Peer reviewers noted that the State’s plan did not specifically address barriers surrounding guardianship and there was no description of what the State Coordinator found in the review of current laws and policies, and did not discuss how SEA monitoring will examine local practices to ensure barriers are removed.
<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 addressing all areas listed in this requirement including the barriers to the education of homeless children and youth caused by guardianship issues.

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 discussed the development, review, and revision of policies to remove barriers in general terms. However, the plan did not include a description of how barriers will be removed relative to all components listed in the requirement. For example, the plan did not mention barriers related to outstanding fees or fines.
<i>Strengths</i>	Peer reviewers identified strengths in the review of policies and potential barriers by the SEA Homeless Coordinator and the monitoring of LEAs through the Kansas Integrated Accountability System. Reviewers noted that LEAs are required to have homeless policies, and are assisted in this matter by the Kansas Association of School Boards, with the SEA attorney reviewing all policies regarding enrollment, attendance and academic success of students experiencing homelessness.
<i>Limitations</i>	Reviewers noted the plan did not provide information surrounding barriers for homeless students related to outstanding fees or fines and questioned the protocol for LEAs or schools who do not use the policies issued by the Kansas Association of School Boards. It was also noted that the narrative did not discuss the findings of the State Coordinator’s review, or clearly describe a process for revision of State or local policies.
<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 describing the current policies and procedures, potential revisions that have been identified, and how those revisions will be carried out. Reviewers also stated that a description of State or local policies relative to fees and fines should be provided.

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 State’s plan described procedures to ensure homeless students that are advancing to post-secondary institutions receive advice, be prepared for, and if necessary, improve their readiness for post-secondary education. While reviewers noted that the plan was specific about the kinds of information and support that homeless youth should receive from school counselors, it did not include discussion of how counselors will be prepared or trained. The SEA has a program to provide Individual Plans of Study for all students in the State and counselors are expected to provide resources from a variety of national service providers.
<i>Strengths</i>	Peer reviewers identified strengths in the plan, including its description of how counselors will work with various agencies, using their resources to ensure students have what they need for the transition to post-secondary institutions, and that student individualized plans will assist and guide students as they prepare for post high school graduation. Additionally, it was noted that the SEA provides counselors with financial aid and registrar contacts at State post-secondary institutions, and references resources counselors will use to support homeless children and youth from the National Center for Homeless Education, the National Association for the Education of Homeless Children and Youth and the American School Counselor Association.
<i>Limitations</i>	Peer reviewers noted that the State’s plan did not discuss how counselors will be prepared for their expected work with homeless students or how their participation in training will be encouraged. Additionally, it was noted that the plan is unclear regarding how the SEA will monitor and assess the effectiveness of strategies.
<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 indicated that the State’s plan could be strengthened by additional discussion on how counselors will be prepared and trained to work effectively with homeless students. The plan should also include further description of any potential collaboration (such as the State School Counselors Association) that will assist with training or information dissemination.