

STATE PLAN

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

State Name: Kentucky



U.S. Department of Education
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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>	The peer reviewers observed that while the role of the local liaison is outlined, it is unclear what procedures the SEA utilizes to identify and assess the needs of homeless children and youth.
<i>Strengths</i>	The peer reviewers saw strengths in the SEA's requirement for a standard identification form providing consistent and accurate identification throughout the State and inclusion of homeless children and youth in the district and school improvement cycle.
<i>Limitations</i>	It was noted that the plan did not provide specific information regarding the State's procedures for identifying students experiencing homelessness, and did not provide a description of its needs assessment procedures or of collecting, reviewing, or using data to support changes in process for the SEA.
<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 the plan could be strengthened by including more information regarding identification procedures and monitoring of LEA accuracy in the identification or the verification of such data. It also needs to specifically address the SEA's procedure for needs assessment.

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 reviewers observed that while the State’s process was outlined, the length of time, and number of steps in the resolution process could inhibit it from being prompt.
<i>Strengths</i>	The peer reviewers saw strengths in the State plan’s specific description of dispute resolution steps and that the plan is available online.
<i>Limitations</i>	The peer reviewers noted that procedures were not provided. The current dispute resolution process describes a series of steps without specific timelines for each level of the dispute. Four levels of formal and two layers of informal dispute could lead to a lengthy time for a student to attend a school from which they may later be unenrolled. The process also does not clarify that a student will be enrolled in the school in which enrollment is sought, pending all available disputes.
<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 adding procedures to ensure immediate enrollment during the dispute resolution process, including information needed if the disagreement moves to the SEA level, such as the person’s name, position, title, and address. It should remove the requirement to include laws, as homeless parents and students may not have access or resources to provide this information. The SEA’s link to the dispute resolution process did not include many of the provisions under ESSA and refers to a district’s interpretation of the definition of a reasonable number of days. Further clarification on these is needed to strengthen the plan’s response to 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>	Reviewers observed the SEA’s plan for ensuring appropriate support to all LEAs and the ongoing support to liaisons, but found it unclear regarding how the SEA engages other school staff to meet the needs of homeless children and youth. Reviewers noted that the SEA has collaboration opportunities with various inter-agency departments as well as external support providers.
<i>Strengths</i>	The peer reviewers saw strengths in the State’s collaboration with community partners and support for homeless liaisons.
<i>Limitations</i>	The peer reviewers noted that while there was a plan, it did not appear to address all requirements. The SEA did not specify the purpose of the interventions, so it is unclear if the McKinney-Vento coordinator is sitting on committees to increase awareness and capacity of the groups. While there appears to be significant opportunity for homeless liaisons for professional learning, it is unclear how the State reaches other staff. In addition, the State plan did not mention runaway and homeless youth.
<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 the State plan could be strengthened by addressing additional position requirements and providing details of how the SEA will create a model for collaboration and dissemination of accurate information or to whom the information should be given. The SEA should describe procedures for staff to heighten awareness beyond liaisons and include a description of runaway and homeless youth.

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 reviewers disagreed that the SEA has procedures in place to ensure appropriate access to preschool services, or if the procedures about how the activities described ensure access to public preschool programs were clear. It was also observed that the SEA plan describes an understanding of the SEA’s role in providing technical assistance, regulations, guidance, and clarification to LEAs to make PreK available to homeless students.
<i>Strengths</i>	Peer reviewer saw strengths in different areas including support of Family Resource Centers and several programs for which homeless children are eligible, with suggested State-level coordination between programs. Reviewers also noted specific guidance, regulations and expectations for the availability of PreK to homeless students and various means of monitoring LEA identification and application of services.
<i>Limitations</i>	The peer reviewers observed that it was unclear how the activities outlined ensure that homeless children have access to public preschool programs. The plan did not describe a systemic approach to ensuring PreK students are actively sought and identified. Additionally, the peer reviewers found the plan to be unclear in its efforts to break down barriers to PreK attendance by homeless students or procedures for the transportation of PreK homeless students.
<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 plan could be strengthened by describing how the SEA ties the activities outlined specifically to homeless children and ensures their access, including details and expectations for removing barriers regarding PreK homeless students. The State should describe procedures for ensuring that homeless students are identified for PreK.

- **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 stated that the SEA met the basic requirements of this section, but that while it outlines specific steps moving toward the identification of children and youth separated from public schools, its current methodology and procedures related to credit accrual are unclear.
<i>Strengths</i>	The peer reviewers noted the SEA has required policies for the removal of barriers and will use LEA data to create a process chart. The State Coordinator works with the Division of Student Success to identify opportunities to support the participation of homeless students. The State has identified the need for a process to identify children and youth separated from public schools and to work towards a statewide process to give assurances that LEAs must allow homeless students full participation in appropriate secondary education and support services.
<i>Limitations</i>	The peer reviewers pointed out the need for a systemic way to identify and remove barriers that prevent students from receiving appropriate credit for course completion and a procedure for awarding appropriate full or partial credit. Also, the SEA's current procedures for ensuring identification of homeless youth and youth separated from public schools are unclear.
<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 description should include SEA procedures for credit accrual and needs to be more specific about the identification and equal access to education, and provide support to meet the criteria.

- **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 outlined procedures and the creation of an administrative regulation specifically addressing the removal of barriers, as well as ensured LEAs compliance with these provisions.
<i>Strengths</i>	The peer reviewers saw strengths in how the plan will allow the SEA to create administrative guidance to allow for the systemic removal of barriers for homeless students' full participation in academic and extracurricular activities. Additionally, it recognized the changing geography of Kentucky's education system as it relates to charter schools and included a plan to include the new ESSA provisions in their regulations.
<i>Limitations</i>	The peer reviewers noted a more robust explanation of the monitoring process would have been helpful in assuring all districts comply with this provision.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3) Reviewers
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

I.5: Strategies to Address Other Problems (722(g)(1)(H) of the McKinney-Vento Act)

- **Does the SEA provide strategies to address other problems with respect to the education of homeless children and youth, including problems resulting from enrollment delays that are caused by—(i) requirements of immunization and other required health records; (ii) residency requirements; (iii) lack of birth certificates, school records, or other documentation; (iv) guardianship issues; or (v) uniform or dress code requirements?**

	<i>Peer Response</i>
<i>Peer Analysis</i>	The peer reviewers observed that while some of the provisions under this requirement are addressed, the plan did not provide enough description to determine that it provides strategies to address each of these areas. The SEA delineated the need for LEAs to ensure that none of the possible issues listed in the requirement keep students from immediate enrollment and states how the LEA liaison should proceed to support the homeless student.
<i>Strengths</i>	The peer reviewers saw strengths in the SEA’s statewide standard that no student is to be denied enrollment, and the plan provided detail regarding the strategies used to lift the barrier of immunization requirements, and uniform or dress code requirements.
<i>Limitations</i>	The peer reviewers noted that while the plan referenced general assurances, there was little discussion beyond stating the statutory requirements of the law. It was unclear to reviewers what strategies will be utilized in removing the barriers of residency requirements, birth certificates, school records, other documentation, or guardianship issues.
<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 plan could be strengthened by providing specific strategies on how it removes barriers to enrollment delays listed in the requirement, which may include model forms, district policies, monitoring of these policies, or other supports.

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 reviewers observed that while the State is making changes to meet the requirements, the plan did not provide details. Also, it was unclear to reviewers how they currently meet requirements to remove barriers.
<i>Strengths</i>	The peer reviewers saw strengths in the use of a statewide needs assessment with quarterly review and collaboration with other departments. These are strong indications of the State’s dedication to remove barriers, and the description included a specific reference to the monitoring of attendance and enrollment barriers.
<i>Limitations</i>	The peer reviewers noted the lack of a process by which the retention of homeless students is looked at systemically. The SEA plan did not describe how policies are currently reviewed and revised or the monitoring of the review/revision policies 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 the SEA could strengthen the plan by ensuring policies exist for each area and by including specific examples of how it currently removes barriers. This may include a link to the KDE policies referenced or more discussion of the monitoring process.

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 peer reviewers observed that the State’s plan for counselor assistance was specific, addressing not only the academic but also the social and emotional needs of youth experiencing homelessness.
<i>Strengths</i>	The peer reviewers saw strengths in the plan’s outline of specific strategies and in having a dedicated consultant to assist with the implementation of this provision. It requires that KDE and consultants work together to disseminate information regarding homeless students and includes a robust description of how counselors will meet the provision of providing assistance to homeless youth, including fee waivers, wrap-around services, career and technical training, coordination efforts, tutoring and mentoring.
<i>Limitations</i>	The peer reviewers noted it would be helpful to outline specific needs of homeless students in receiving meaningful counseling that goes beyond what non-homeless students get. Often homeless students need additional supports such as FAFSA application support and assistance with college and technical school applications. Reviewers also indicated that it would enhance this section to include the process the State will utilize to verify that these activities occur at the local level and translate to college readiness for homeless youth.
<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>	