

STATE PLAN

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

State Name: Massachusetts



U.S. Department of Education

June 22, 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 observed that the SEA provided a comprehensive description of procedures and strategies to train and support LEAs in identifying and assessing the needs of children and youth experiencing homelessness, which included training, outreach, guidance, webinars and posters.
<i>Strengths</i>	The peer review panel noted that the SEA provided training to new liaisons each fall, as well as a variety of training formats throughout the year. Additionally, the SEA coordinated with the Migrant Education program and participated in outreach with service providers including Continuum of Care, Head Start, and local councils. Additionally, the plan outlined SEA outreach to families and partners to help in the needs assessment for children and youth experiencing homelessness.
<i>Limitations</i>	<p>The peer review panel saw that the SEA described a strategy for providing training on “best practices in needs assessment” but there was not a clearly outlined system of a Statewide needs assessment for the EHCY program. Additionally, there was no description of how LEAs provided, and the SEA monitored, the needs assessment of individual students.</p> <p>The peer review panel recommended that the plan would be strengthened with an accountability procedure to ensure that liaisons and school personnel partake in the SEA’s professional development/technical assistance opportunities regarding identification and needs assessments.</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 that the SEA had a well-defined dispute resolution procedure and gave reference to the timeframe of the dispute resolution. However, the process was unclear because the State Coordinator did not make the final decision (it was reviewed by the Commissioner’s Designee and Legal Unit).
<i>Strengths</i>	The peer review panel noted that the SEA’s dispute resolution process had reviewed, revised, and reflected new ESSA requirements, as well as posted it on the SEA’s web page along with necessary forms. Additionally, the SEA had procedures and timelines to ensure State-level disputes were generally resolved within 10 days. Furthermore, the plan assured that students would remain in the selected school throughout the dispute process.
<i>Limitations</i>	The peer review panel recommended that the plan would be strengthened with a sample of the two brief forms mentioned in the plan: the School District Notification to Parent/Guardian of Enrollment Decision and the Parent/Guardian Appeal of School District Enrollment Decision.
<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.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>	The peer review panel observed that the SEA participated in a wide variety of activities designed to increase the awareness of school personnel, service providers, and community members about the needs of homeless children and youth. The plan had extensive details in regards to collaboration and coordination with various commissions, councils and outside agencies. Additionally, the State Coordinator was represented on various councils to heighten awareness.
<i>Strengths</i>	The peer review panel noted that the SEA coordinated with a number of stakeholders including various State interagency workgroups, Head Start, Migrant Education, school health professionals, and others. The SEA provided trainings regionally and locally in the State through in-person and online means to all of the targeted groups, and responded to a number of phone calls for technical assistance. Additionally, the SEA used monitoring to heighten awareness, improve identification, and support homeless students.
<i>Limitations</i>	<p>The peer review panel saw that the plan did not address other categories such as runaway youth, juvenile justice students, or children and youth living in shelters. Additionally, the plan did not specify what the liaison’s responsibility was in regards to heightening awareness.</p> <p>The peer review panel recommended that the plan would be strengthened with an accountability procedure to ensure that liaisons and school personnel partake in the SEA’s professional development/technical assistance opportunities.</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.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 observed that the SEA addressed the EHCY program’s representation on various committees. However, the plan did not respond to the requirement and didn’t provide details regarding the procedures to ensure that homeless children had access to public preschool programs.
<i>Strengths</i>	The peer review panel noted that the plan had taken into account ESSA concerning preschools. Also, the State Coordinator served as the collaborative instrument on a variety of regional roundtables and Early Childhood Collaborative groups centered on preschool populations and unaccompanied youth. Also, the SEA had a State McKinney-Vento Steering Committee that included representatives from early childhood programs.
<i>Limitations</i>	<p>The peer review panel saw that the SEA’s narrative discussed issues around the transportation of children to public preschool but failed to discuss enrollment or access to such programs. Additionally, the plan stated that the SEA understood the new ESSA requirement but did not provide detailed descriptions of the SEA or LEA procedures to meet the requirement. Furthermore, it was noted by a peer reviewer that no universal mandatory preschool was provided by the State.</p> <p>The peer review panel recommended that the plan would be strengthened if it included how homeless preschool children were tracked.</p>
<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 reviewers suggested that the plan would be strengthened if it would describe how homeless children will have access and enrollment to public preschool programs, as well as the services that they will provide, how class space will be held for these children, how these children will be identified, especially those who are not at compulsory school age, and how parents will be informed of the enrollment process. Also, the peer reviewers recommended that the methods to prioritize these children on waiting lists, if applicable, be added to the plan.

- **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>	The peer review panel observed that the SEA used multiple strategies and procedures to ensure that homeless youth were provided equal access to secondary education and support services. LEAs worked to provide credit from prior schools to homeless youth, form verifications, and college and career counseling.
<i>Strengths</i>	The peer review panel noted that the SEA worked closely with dropout prevention programs to provide services to students experiencing homelessness. Also, there was an implementation of mentoring programs to re-engage students at risk of dropping out or already disconnected. Furthermore, the State had a Commission for Unaccompanied Homeless Youth and Young Adults focused on the needs of these students and ensured best practice dissemination through program training, technical assistance, sub-grant funding, and monitoring. Alternative education to recover credits was mentioned, as well as the SEA’s review of transfer credits from prior schools.
<i>Limitations</i>	The peer review panel observed that the SEA did not address a process for students that were being detained nor did it provide clear guidance for obtaining information from a different SEA in regards to credits. The peer review panel recommended that the plan would be strengthened from a brief explanation of “home rule.”
<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 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 observed that the SEA had regulations that covered a variety of areas to ensure that homeless students do not face barriers and have the ability to access academic and extracurricular activities. Additionally, a peer reviewer observed that the homeless education section of the plan lacked specific procedures to ensure that homeless children and youth had access to the variety of programs listed in the requirement, along with extracurricular activities.
<i>Strengths</i>	The peer review panel noted that the SEA had rules requiring access of homeless youth to summer school, extracurricular activities, and all school courses. Also, fee waivers and scholarships for these programs were in place to eliminate barriers due to costs, and alternative transportation was encouraged to assist youth with evening and off-campus activities. Barriers due to transportation and fees were addressed with strong details, and homeless students were additionally mentioned under Section 6: Supporting All Students.
<i>Limitations</i>	The peer review panel observed that many of the activities listed in the requirement were not addressed (e.g., Magnet schools, online learning, or charter schools) and minimal procedures were provided.
<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 peer reviewers suggested that the plan would be strengthened if it would specify procedures to ensure that homeless children and youth have access to a variety of activities that are listed in this requirement.

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 review panel observed that the SEA provided strategies through trainings and professional development to emphasize a variety of ways that the SEA and the LEAs could remove enrollment delays due to the causes listed in the requirement.
<i>Strengths</i>	The peer review panel noted that the SEA provided a comprehensive list of strategies and included review of immunization policies, use of residency affidavits, school to school transfer of records, trainings, school-based health clinics, and expanding liaison’s capacity. The plan addressed waving fees and fines as to not delay enrollment and/or transfers. The SEA partnered with the MA Department of Public Health to review policies on immunizations and health records each year and sent out joint updates to school nurses annually. Additionally, the SEA presented to school-based health clinic staff about issues specific to homeless youth. The plan also addressed the attendance rate of homeless students and the requirement for expeditious transfer of records from school to school.
<i>Limitations</i>	The peer review panel saw that LEAs in the state used third-party residency verification for enrollment, and birth certificates and guardianship issues were not addressed in the plan; however, the plan addressed the other causes listed in the requirement.
<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.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 observed that the plan did not adequately demonstrate how the SEA and the LEAs developed, reviewed, and revised policies to remove barriers to identification, enrollment, and retention of homeless children and youth. One peer reviewer observed that the plan did not have a precise written policy but a strategy in a different policy.
<i>Strengths</i>	The peer review panel noted that the SEA served as a third-party conduit for records transfer in some domestic violence cases. Also, the SEA had requirements that enrollment and/or transfer not be delayed due to outstanding fees or fines. The plan mentioned attendance rates of homeless students and collaborations between the SEA and a variety of State agencies to address the attendance rate.
<i>Limitations</i>	<p>The peer review panel observed that in multiple places of the State plan the SEA referred to various policy revisions that had taken place but did not describe a process or procedure to govern that review and revision. Also, the SEA did not address policy barriers involving school attendance nor did it detail the process for removing barriers for parents or unaccompanied and homeless youth. Furthermore, it was unclear in the narrative how the SEA would ensure that LEAs participated in the review and revision of local homeless education policies to remove barriers for homeless children and youth.</p> <p>The peer review panel recommended that to strengthen the plan, the SEA could develop an accountability process to ensure that LEAs have such policies.</p>
<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 reviewers suggested that the plan would be strengthened if it would clarify how it ensures that policy to remove barriers are developed, reviewed and revised at the local level related to the identification, enrollment, and retention of homeless children and youth, and policies regarding attendance and retention.

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 review panel observed that the SEA addressed a variety of ways homeless youth received assistance from not only counselors but other school staff to prepare for a post-secondary experience. The SEA also internally and externally collaborated to support homeless students for postsecondary education prior to graduation. Also some of the information was addressed in Section 6: Supporting All Students.
<i>Strengths</i>	The peer review panel noted that the SEA mentioned the ongoing use of Individual Learning Plans to support homeless youth with preparing for college, and that the State Coordinator provided an avenue for administrative staff, counselors, and local providers to assist students with needs for housing, food and support while in transition. Also, the SEA participated in a Post-Secondary Homeless Student Network which held regional forums that brought together higher education staff with high school counselors to increase awareness and response to homeless youth.
<i>Limitations</i>	The peer review panel observed that the plan described how FAFSA information for unaccompanied homeless youth was provided to local liaisons but did not describe how that information was provided to school counselors. Also, the plan did not address any sort of accountability to ensure that homeless youth were receiving this assistance or if counselors were receiving awareness from the Post-Secondary Homeless Education Regional Forums. The plan did not elaborate on the collaboration of the liaison with counselor in verifying student status. The peer review panel recommended that the plan provide more detail on the duties and responsibilities of the “adjustment counselor.”
<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>	