

STATE PLAN

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

State Name: Maryland



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>	Reviewers observed that the plan provided a thorough and complete description of how the SEA works with and provides information to LEAs to assist them with the identification of students. Reviewers noted that the plan described that the SEA has developed an advisory group that looks at gaps in identification along with other relevant data. It was also noted that the plan noted the support provided by the McKinney-Vento State Coordinator in identifying and assessing children and youth experiencing homelessness, as well as support ensuring that policies are reviewed/revised to eliminate barriers to enrollment and retention. Reviewers also saw that the plan described how MSDE provided ongoing consultation, guidance, technical assistance, resources, and monitoring of local school systems on the McKinney-Vento law, policies, and best practices.
<i>Strengths</i>	Reviewers identified strengths including the plan’s discussion of the multiple ways the State works with LEAs and local liaisons to provide them with information to develop procedures for the identification of students. Reviewers also saw strengths in the plan’s description of the State’s establishment of an advisory committee that meets to identify gaps in services and to review data, laws, and polices affecting homeless students.
<i>Limitations</i>	Reviewers noted that the plan did not provide specific details on procedures for how students should be identified and assessed. For example, additional detail was needed regarding what support is provided to liaisons to ensure procedures are in place for identifying and assessing homeless students, how policies are reviewed and revised, information regarding the training liaisons are required to have in order to ensure identification and assessment of homeless students, the liaison’s role and responsibilities for training district personnel to ensure timely and appropriate identification of homeless students, how data from needs assessments is used to drive improvements or gaps in identifying and serving homeless students, and the distribution of public awareness materials on the rights and identification of homeless children and youth. It was also noted that the plan would be stronger if it included details regarding the dissemination of guidance, technical assistance, resources, and monitoring.

<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.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>	Reviewers observed that the plan described how MSDE has a dispute resolution policy and provided details on what is expected from the dispute resolution process. Reviewers also observed that the plan described how the SEA trains LEAs on the dispute resolution process, citing the plan’s mention of local-level support provided through training for liaisons, and that the plan described how each process is on the SEA’s website. It was also noted that specific dispute resolution timelines were not provided.
<i>Strengths</i>	Reviewers identified strengths in the plan’s description of aspects of the dispute process, including the mention of expedited timelines, the communication of rights, and a local policy requirement. Reviewers also noted the plan’s mention of the SEA and LEAs collecting and maintaining communication logs of disputes and reported barriers, using this information to inform training needs, and providing translation and interpretation in multiple languages.
<i>Limitations</i>	It was noted that specific timelines or timeframes are not described in the plan; these are needed to guide LEAs and provide families and students an expected timeframe for both the LEA and SEA.
<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 plan could be strengthened by being specific regarding timelines for the various steps of the dispute resolution, noting that if the timeframes are available, they could be included in the plan. Including timeline information could help determine if there are procedures for a prompt resolution.

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 that the plan included details regarding various training modalities and the sharing of resources, referencing topics available for a variety of staff through local, State, and national organizations to heighten the awareness of specific needs of homeless and runaway children and youth.
<i>Strengths</i>	Reviewers identified strengths including the plan’s description of how the SEA provided multiple options for training opportunities for a variety of staff, the various topics of trainings provided, and the training resources available at a national level for school staff. Also noted was the plan’s mention of the SEA’s provision of guidance to liaisons for developing and implementing their own ongoing training strategies. Also observed was the plan’s use of training programs based on best practices for addressing specific needs, identification, and awareness of homeless children.
<i>Limitations</i>	Reviewers noted that the plan did not include specific information about trainings that have occurred. It was also noted that the plan could benefit from adding more specific information about how training will be conducted and whether materials will be specific to the audience being trained. Reviewers indicated that the plan would be stronger if it included an accountability procedure to ensure that liaisons and school personnel partake in the SEA’s professional development and technical assistance opportunities.
<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.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>	Reviewers observed that the plan emphasized collaboration and coordination, describing multiple organizations that work with the SEA to assist LEAs in providing preschool options for and ensuring access to preschool programs for homeless preschoolers. Collaborations mentioned in the plan include Head Start, Judy Centers, the Office of Child Care, State publicly-funded Pre-K programs, the State Coordinator for the Early Childhood State Advisory Council, the Special Education State Advisory Council, and the Interagency Council for Infants and Toddlers. Also noted was the plan’s description of a State law that guarantees homeless four-year-olds enrollment in preschool programs when spots are available.
<i>Strengths</i>	Reviewers identified strengths in the plan’s listing of collaboration and coordination with various programs and agencies that provide educational opportunities for this age group. Reviewers also identified strengths in the plan’s description of a State law and regulations that ensure the enrollment of homeless four-year-olds in public preschool programs within each LEA. Also noted was the plan’s description of how students without proper documentation should be enrolled in programs, and the plan’s mention of prioritizing the enrollment of homeless children in preschool programs.
<i>Limitations</i>	It was noted that the plan did not describe how data on preschool children will be captured and utilized to identify gaps in service and access to preschool programs or for training purposes.
<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>	

- **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 plan mentioned technical assistance the SEA will offer to LEAs and local liaisons, including through the provision of support for developing procedures to award credit to homeless youths who satisfactorily complete full or partial coursework, and the provision of model documents related to the awarding of credit. Reviewers noted that MSDE will support liaisons in developing and incorporating credit award procedures as part of the immediate enrollment process for homeless students. It was also noted that the plan did not describe procedures for identification and the removal of barriers.
<i>Strengths</i>	Reviewers identified strengths in the plan's description of the SEA's development of model procedures and best practices related to ensuring that homeless students receive partial or full credit for the work they have accomplished. Reviewers also noted strengths in the SEA's work with LEAs, including disseminating model procedures and best practices, working with LEAs to develop plans, and the monitoring of LEA administrative procedures and regulations.
<i>Limitations</i>	Reviewers observed that the plan did not provide details in certain areas, including what will be included in model procedures, how identification and/or barriers should be addressed, and liaison responsibilities to train other personnel, such as counselors or administrators who are frequently the individuals responsible for awarding credits. It was also noted that the plan did not include a detailed description of procedures and assurances.
<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 plan could be strengthened by including comprehensive procedures for the identification of homeless youth and youth separated from public schools, as well as removing barriers to coursework completion. In addition, it was also noted that the plan would be strengthened by describing in detail the technical assistance and dissemination of resources, including a timeline and accountability measures.

- **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>	Reviewers observed that the plan included some barriers that should be removed but did not describe the removal of barriers in all of the various programs listed in the requirement. It was noted that the plan mentioned that the SEA will work with LEAs to develop procedures, including alternative assessments and application procedures. It was noted that the plan stated that the SEA will work with LEAs to ensure that homeless students be given the opportunity for immediate enrollment, but didn't explain how this will be done.
<i>Strengths</i>	Reviewers identified strengths in the plan's mention of the SEA providing funding support for fees and assistance with school entry to LEAs so that normal requirements and deadlines do not pose a barrier for homeless students, as well as the plan's mention of the SEA working collaboratively with LEAs to develop procedures.
<i>Limitations</i>	Reviewers noted that the plan did not provide specifics on how barriers to each of the programs listed will be removed, and did not provide a detailed description of procedures and assurances. It was noted that the plan described limited monitoring in this area, as well as review and revision of policies to ensure that homeless children and youth are afforded equal access and the ability to fully participate in academic and extracurricular activities.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1) Reviewer <input checked="" type="checkbox"/> No (2) Reviewers
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	Reviewers indicated that the plan could be strengthened by providing detailed procedures ensuring access for homeless students to all programs indicated in the question, including magnet schools, summer schools, career and technical education, advanced placement, online learning, or charter school programs.

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>	Reviewers noted that while the plan stated that the SEA will work with LEAs to ensure the immediate enrollment of homeless children and youth even if they are unable to produce records normally required for enrollment, it is unclear how this will be done or monitored.
<i>Strengths</i>	Reviewers noted strengths in the plan’s requirement that liaisons assist students with obtaining the documents described in this section.
<i>Limitations</i>	Reviewers observed that the plan does not describe specific strategies that the SEA and LEAs will use to limit enrollment delays based on lack of paperwork. One reviewer noted that the plan did not address how the SEA will regularly review/revise policies that may act as a barrier to the identification, enrollment and attendance of homeless children and 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>	Reviewers indicated that the plan could be strengthened by including more detailed strategies that address the problems of enrollment delays due to the various issues stated in the question, including how to help liaisons obtain the information needed by working with families and other organizations, such as previous schools and/or states where the students may have previously attended. Reviewers noted that each indicated issue (i-v) can require similar as well as very different strategies to address the problem, and that the plan could be strengthened by a focus on policy revision/review.

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>	Reviewers noted that the plan described a variety of activities, resources, trainings, and strategies that have been/are offered to liaisons and LEAs to help remove barriers to the identification, enrollment, and retention in school of homeless children and youth.
<i>Strengths</i>	Reviewers identified strengths in the plan’s description of multiple ways in which the SEA works with LEAs to provide information to remove barriers to the enrollment and retention of homeless students, including the description of a variety of ways in which the State provides guidance to and trains liaisons and LEAs.
<i>Limitations</i>	Reviewers noted that the plan did not mention the development, review, and revision of policies. One reviewer noted that there was no mention of a specific process for monitoring if the strategies are working or how that will specifically relate to policy review and revision.
<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.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>	Reviewers observed that the plan offered a plan to assist homeless youth with college readiness activities not only by school counselors, but also by the local liaison and community partners. One reviewer noted that the plan provided a variety of opportunities that counselors are made aware of that will help them serve the unique needs of their high school students who are in the process of transitioning to a post-secondary institution.
<i>Strengths</i>	Reviewers identified strengths in the plan’s description of multiple supports and opportunities available for homeless students working with counselors, including the support counselors provide to homeless students through the development of a four-year college readiness plan, collaboration with content specialists to ensure homeless youth are enrolled in transition courses to prepare them for college, along with other supports, such as identifying courses, activities and resources to provide academic and social-emotional support aimed at improving college readiness.
<i>Limitations</i>	Reviewers observed that information regarding homeless students and the FAFSA and specific scholarships that may be available for homeless or at-risk students was not described, and that the plan could be stronger by presenting a timeline and/or accountability procedure for school counselors. It was also noted that the plan didn’t account for whether graduation and outcome data was used to determine if the strategies described are effective.
<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>	