

# STATE PLAN

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

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State Name: Maine



**U.S. Department of Education**

**June 28, 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 plan does not describe how the SEA will ensure that LEAs identify homeless students. Rather, the plan indicates that identification will be the responsibility of the State Administrative Units (SAUs). The peer review panel observed that irrespective of identification being primarily the responsibility of the LEAs and/or SAUs, the SEA should describe its activities related to identification, including how the SEA plans to monitor LEAs for this requirement.
<i>Strengths</i>	The peer review panel observed that the SAUs could be used to provide various professional development and technical assistance opportunities across the State, provided that they are specifically used to do so. It was also observed that the plan references materials available from NCHE to help with identification.
<i>Limitations</i>	The peer review panel observed that the plan does not provide enough information about its program for a reader to determine whether the SEA has procedures in place that will identify homeless children and youth. Specifically, the peer review panel observed the following questions were unaddressed in the plan: How will the SAUs determine eligibility? Do they make the determination and not the LEAs? How does the locally developed informal needs assessment tool operate? Who develops the tool? Does it differ from LEA to LEA or is it used State-wide?
<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 review panel observed that it is unclear from the plan what procedures the SEA and SAUs will implement to identify homeless children and youth. Specifically, the peer review panel observed that the plan should be revised so that it answers whether SAUs represent the SEA's EHCY program or whether they work in conjunction with it. It was observed that the plan should outline the minimum acceptable identification activities expected of all SAUs and what the State Coordinator will do to support and monitor them. As one example, the State Coordinator can provide: posters for local distribution to all schools, shelters, and other locations where homeless families and youth might see them; and sample intake and assessment forms that have been vetted for quality. As another example, the State Coordinator or local liaisons can send information or conduct awareness activities for shelter providers and social services personnel. Furthermore, the plan could be revised to describe State-level needs assessment activities that will be conducted to improve program operation and delivery of services.

**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 plan indicates the SEA has established a dispute resolution procedure, but it also observed there is no discussion of those procedures in the plan. It was observed that this section of the plan names the current EHCY program consultant, but does not indicate what will occur once that specific individual is no longer in the role.
<i>Strengths</i>	The SEA indicates that it has established a dispute resolution procedure.
<i>Limitations</i>	The peer review panel unanimously agreed that the plan does not describe the SEA’s dispute resolution procedures, therefore making it difficult to determine whether those procedures support the educational placement of homeless children and youth.
<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 review panel unanimously agreed that the plan should be improved to describe the dispute procedure in sufficient detail to determine whether the process is clear, responsibilities are delineated, timelines are appropriate, and communication procedures are sufficient. The plan should also discuss how local homeless liaisons and other personnel will be trained on their responsibilities and whether LEA monitoring will examine implementation of the State’s procedures.

**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 plan describes the trainings that the SEA staff will conduct, including regional trainings that will consist of in-person meetings, webinars, and conferences. However, outside of this description of how trainings will be provided, the plan does not contain a description of how those trainings will be tailored to various audiences or reflect ESSA requirements.
<i>Strengths</i>	Training activities will be conducted throughout the State and that the Student Support team and the McKinney-Vento program staff have what appears to be an ongoing collaboration.
<i>Limitations</i>	The peer review panel observed that the plan indicates that all school personnel will receive training, but that the plan lacks a description how the various constituencies will participate in that ongoing professional development. Furthermore, the peer review panel observed that the plan lacks a description of how local homeless liaisons will provide professional development. It was also observed that the plan does not indicate how conducting a needs assessment or utilizing data to guide what topics will be prioritized in the training opportunities. There is no reference in the plan to how the SEA will address changes under ESSA requiring training and documentation for local liaisons and other school personnel.
<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 review panel unanimously agreed that the plan should be improved to describe all elements in the requirement. For example, the plan should describe professional development programs that discuss runaway and homeless youth. Moreover, the peer review panel observed that the plan could be improved to detail how professional development will be delivered in a manner that ensure participants gain sufficient knowledge relevant to their job roles. The plan could describe the mechanism to document professional development participation, especially by local liaisons, and to include professional development as an element in LEA monitoring. Furthermore, it was observed that if local homeless liaisons are expected to provide professional development to their school personnel, this should be indicated and described in the plan.

**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 the plan indicates that the SEA does not have a universal public preschool program. However, it was also observed that the plan does not specify whether individual LEAs possess preschool programs, and if so, how the SEA will ensure eligible homeless children access them.
<i>Strengths</i>	The plan indicates the SEA will continue to build upon existing collaborations with the Early Childhood Education Consultant and that it includes information on eligibility of homeless students in the National School Lunch Program.
<i>Limitations</i>	The peer review panel observed the plan indicates that the SEA does not possess a universal public preschool program, but that the plan does not specify whether individual LEAs possess preschool programs, and if so, how the SEA will ensure eligible homeless children access them. The peer review panel observed that the plan does not mention monitoring and program review, and that the mention of collaboration is done in a very general way.
<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 review panel unanimously agreed that the plan should be improved to include a description of the procedures the SEA will use to ensure that homeless children possess access to any public preschool programs administered by LEAs. Furthermore, the plan should also include a description of any current and future collaboration between the SEA and other early childhood programs. For example, the plan could be improved to describe a set of activities to be used, at a minimum, to foster appropriate identification and enrollment of preschool children. Furthermore, improvements to the plan can be made to discuss the outcomes expected from the collaboration with the early childhood consultant. Finally, it was observed that while there is mention of working with a consultant, the plan does not specify the use of a contract agreement, scope of work, and expected outcomes of the consultant's work. The plan could be improved to describe these.

- **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 plan provides very little information regarding the SEA’s procedures to ensure homeless youth and youth separated from public schools are identified and accorded equal access to appropriate secondary education and support services. Specifically, the plan indicates that the SEA works collaboratively with SAUs to ensure local policies are appropriate, but it provides no details about what the collaboration entails. Meanwhile, the plan does not provide details of its general assurance to remove barriers to homeless students.
<i>Strengths</i>	The plan mentions the legal requirement regarding ensuring equal access to homeless students and that the nine SAUs are required to review policies and procedures.
<i>Limitations</i>	The peer review panel observed the plan does not describe issues that may pose as barriers to homeless students, thereby making it difficult to determine whether the SEA’s procedure are sufficient such as when a situation of partial credit accrual arises. The peer review panel unanimously agreed that there are no activities described for helping SAUs engage in appropriate efforts to identify and enroll homeless youth and it could be inferred from reading the plan that the SEA does not possess policies to addressing barriers to credit accrual. If there are State-level policies, no mechanisms are described to how local policies will be reviewed, evaluated and, (if needed) revised.
<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 review panel unanimously agreed that the plan should be improved to describe guidelines, protocols, and procedures of all elements in the requirement. The plan could be improved to describe barriers homeless students may encounter and if such a barrier arises and how the SEA will address them. The plan needs to be more specific about the minimum acceptable identification activities by all districts and what the State Coordinator will do to provide resources, arrange or conduct training for key constituencies, and monitor the outcome of local identification efforts. Furthermore, the plan should be improved to describe local policies and procedures governing credit accrual.

- **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 plan indicates that the SEA will provide training and technical assistance; however the plan does not describe the procedures related to that assurance. The peer review panel observed that there is no description of SEA or LEA level policies and procedures that address any of the specific elements within the requirement, including access to academic and extracurricular activities.
<i>Strengths</i>	The peer review panel observed that the strength of this section of the plan is that it indicates the SEA has a system in place that will address this requirement.
<i>Limitations</i>	The peer review panel observed that outside of the indication that the SEA will provide training and technical assistance on this requirement, there is no description of its procedures that will ensure academic and extracurricular access to homeless students.
<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 review panel unanimously agreed that the plan should be improved to describe the procedures that the SEA will use to ensure homeless students possess access to academic and extracurricular activities. Furthermore, the plan could be improved describing what academic and extracurricular activities are offered and furthermore provide sufficient level detail so that a reader can determine whether this requirement is met by the described procedures.

**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 plan indicates that training and technical assistance will be provided to ensure problems resulting from enrollment delays are addressed. However, it was also observed the plan does not provide strategies to address the possible issues enumerated in the requirement or provide an overview of the State and local policies and procedures that will mitigate enrollment delays.
<i>Strengths</i>	None were identified.
<i>Limitations</i>	The peer review panel observed that plan indicates that training and technical assistance will be provided to ensure that all barriers are removed, but that the plan lacks a description of the strategies the SEA will use to do so.
<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 review panel unanimously agreed that the plan should be improved to describe more detailed information regarding the training and technical assistance that will ensure homeless students do not face barriers that disrupt their education resulting from enrollment delays caused by lack of birth certificates, school records, or other documentation, guardianship issues, and uniform or dress code requirements.

**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>	One member of the peer review panel observed that the plan provides a demonstration of how the SEA will mitigate enrollment and retention barriers through statute and training. While the described training addresses fees and fines, the plan does not demonstrate how these may be addressed in State or local policy. The plan indicates that the State Coordinator reviews statutes and rules, but there is no description of when or how this occurs, either at the State or local level. A second member of the peer review panel observed that the elements listed in this requirement have been demonstrated in the plan and that the training across the State by the SEA assures that LEAs are aware of these requirements and do not pose as barriers.
<i>Strengths</i>	There was a difference of opinion among the peer review panel with one panelist observing that there were no identifiable strengths of this section of the plan, while two other panelists observed a strength to be that State statute addresses absences and the State Coordinator reviews statute and procedures.
<i>Limitations</i>	The peer review panel noted that restating the requirement regarding immediate enrollment does not constitute a plan, but only an expectation that LEAs will follow through. More specifically, it was observed that the plan does not demonstrate how the SEA will ensure LEAs comply.
<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 review panel observed that the plan could be improved to demonstrate how attendance is addressed in State-level statute and policy. The plan could also be improved to demonstrate how State or local policies address other barriers, including identification, enrollment and retention, and fees and fines. The plan should describe the process by which policies are reviewed by the State Coordinator, whether as part of monitoring or by some other established procedure.

**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>	Two of the three peer review panelists agreed that this section of the plan does not meet the requirement because the plan does not describe how homeless youth will receive assistance from counsellors to prepare for college. Rather, it was observed by the peer review panel that the plan indicates the SEA will provide training and technical assistance to meet this requirement, but that there is no mention of other SEA activities. Similarly, it was observed collaboration was mentioned, but there was no description provided regarding how the State Coordinator will work with counselors on strategies to improve college readiness among homeless youth.
<i>Strengths</i>	Collaboration with State Student Services Coordinator and Guidance Advisory Committee.
<i>Limitations</i>	The peer review panel observed that the plan lacks details as to the services the SEA will provide that could help support or benefit students who are experiencing homelessness.
<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>	Two of the peer review panelists observed that the plan lacks a description of how the State Coordinator will work with the SEA’s Student Services Coordinator. Furthermore, there is no indication how the collaboration will operate moving forward or what is the intended outcome of the relationship. Disseminating the requirement, as mentioned in the plan, appears to be the role of the Guidance Advisory Committee. However, it was observed that the plan lacks a description of how this will occur, what information will be disseminated, or the procedures that governs the dissemination. The plan should be improved to describe the assistance from counselors that homeless students will receive and the professional development activities provided to counselors.