

STATE PLAN

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

State Name: Michigan



U.S. Department of Education
June 21, 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 this section describes identification and needs assessment in general, but that it lacks details regarding the activities to be undertaken to make those procedures happen. For example, the reviewers observed that the plan does not describe a minimum set of resources and activities that LEAs are expected to utilize in their identification efforts. Rather, the plan indicates that the State Homeless Education Team will develop and implement professional development for a wide range of audiences about eligibility and identification, but the plan does not give a description how this will be carried out to reach the various audiences. Furthermore, the panel observed that the team will develop partnerships, but no examples are given of what these partnerships might be or how they can contribute to meeting intended goals.
<i>Strengths</i>	The peer review panel observed strengths of this section are conducting a needs assessment across all LEAs; utilizing data on identification, attendance, and achievement to feed into needs identification; and monitoring of all LEAs and consortia to ensure compliance.
<i>Limitations</i>	A member of the peer review panel observed the plan provides no description of the extent that identification of homeless children and youth is a problem and what aspects need to be addressed. Specifically, it was observed that the plan lacks description about: the identification efforts that will be encouraged and required; the professional development to be conducted; and the partnerships to be developed. It was also observed that the plan lacks information about current program status, progress achieved, or particular problem areas that need to be addressed going forward. The result is rather general language about what the EHCY program will do to make progress.
<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>	

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 affirms that a State-developed Dispute Resolution Guidance is distributed to all LEAs. From the general description provided in the plan, the Guidance appears to meet this requirement at a minimal level. However, the peer review panel also observed that more information about the Guidance and review/update procedures would strengthen this section.
<i>Strengths</i>	The peer review panel observed that formal guidance has been developed by MDE and that it is distributed to LEAs through multiple means. Furthermore, the peer review panel also observed that the dispute resolution process described is time-sensitive, contains multiple levels of appeal, and emphasizes minimizing school disruption.
<i>Limitations</i>	The peer review panel observed that the plan mentions that the process is time-sensitive, but that it does not describe what time-sensitive actually means. Other members of the peer review panel observed that it was difficult to locate the described process on MDE’s website. The panel observed that it can be inferred that LEAs are required to follow the guidance processes, but that the plan would be improved by stating this obligation outright. Finally, it was observed that more information on the guidance would be helpful, particularly regarding the nature and timing of dispute communications at each level.
<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>	

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 plan describes multiple means for delivering professional development to various constituencies. In particular, the online training and credentialing will benefit liaisons that elect to participate in the training. The panel observed that there is a process described for continuing to gather input about training needs, but a limitation of this section is that it needs more detail about professional development taking place at the local level.
<i>Strengths</i>	The peer review panel observed strengths of this section are the online training for liaisons, the certificate to recognize those who complete the training, and the multiple avenues for professional development (e.g. regional and state meetings, webinars, professional meetings, and website resources). It was also observed that the bi-monthly meetings to assess training needs are also a strength.
<i>Limitations</i>	The peer review panel observed that no mechanism is described as an incentive for liaisons to participate in the online training, and that more detail is needed on how the professional development targeted at specific groups (administrators, counselors, transportation staff, etc.) will be carried out. It was also observed by the peer review panel that data are not cited in the plan as being utilized to guide what topics will be prioritized for inclusion in the training. The plan does not describe what role, if any, liaisons will take in providing local professional development to school personnel. The plan would be improved by including more detail regarding the various personnel groups that will obtain professional development, as well as the topics that will be prioritized according to needs assessment data.
<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 plan describes how the State collaborates with preschool organizations, but they unanimously agreed that the plan lacks a description how children will <i>access</i> preschool education. More specifically, the peer review panel observed that the plan lacks a description of the procedures that the SEA and LEAs will use to ensure that preschool-aged children actually access the programs that are offered in Michigan.
<i>Strengths</i>	The peer review panel observed as strengths the identification of key constituencies that need to be involved in training and technical assistance activities, as well as collaboration with other programs.
<i>Limitations</i>	The peer review panel observed the plan does not address how children experiencing homelessness will actually access preschool programs, and the plan lacks detail about the expected outcomes of the various collaborations. The plan could be improved by describing how, based on needs assessment data, specific LEAs or particular audiences will be provided with targeted and/or a higher degree of technical assistance.
<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 SEA did not meet this requirement because the plan does not describe the procedures that the SEA and LEAs will use to ensure that eligible preschool-aged children will actually be able to access to the preschool programs in Michigan.

- **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 programs exist to help homeless youth with credit recovery and that the plan describes several good strategies for addressing this issue, particularly the development of the State-level guidance and the inclusion of unaccompanied youth outreach in local monitoring.
<i>Strengths</i>	The peer review panel observed the following strengths in this section of the plan are: development of formal guidance and procedures at the State-level that will improve consistency across LEAs; outreach to unaccompanied homeless youth is part of the monitoring process; homeless youth possessing access to online courses, summer school, and tutoring for credit recovery is currently available; and the SEA has set goals to establish guidance and procedures for partial and full credit.
<i>Limitations</i>	The peer review panel observed that other than developing the State-level guidance, the remainder of this section in the plan is a description of what has been done already, not what will happen going forward. No data are cited to indicate the extent to which access to secondary education and services by youth is a problem and, if it is a problem in Michigan, what aspects need to be addressed. Furthermore, it was observed that while the plan is minimally satisfactory in addressing this requirement, the plan would be improved by more clearly stating what will be done to make further progress on this issue.
<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 the descriptions are generic and that some elements of the requirement are not described. The peer review panel observed that the plan indicates that the State Coordinator provides training on the law, but that there is not a discussion of current procedures and what will be done going forward to ensure that priority areas of this issue are identified and addressed and current procedures are reviewed and updated.
<i>Strengths</i>	The peer review panel observed strengths of this section of the plan are: coordination with the Athletic Association, providing forms and procedures to local liaisons, training of multiple staff, providing guidance regarding extracurricular activities, and providing training and technical assistance regarding barriers.
<i>Limitations</i>	The peer review panel observed that career and technical education, magnet schools, and charter schools are not described within the plan, and therefore the plan does not describe how the barriers to homeless children and youth accessing them will be handled. It was also observed that the plan lacks a description of the procedures to be followed and that it only indicates that training will be provided. Finally, it was observed that the plan also lacks information on whether monitoring is conducted to ensure all barriers are addressed.
<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 needs a more specific discussion of current procedures for ensuring access to both extracurricular activities and the various academic programs listed. Furthermore, the plan needs a description of what will take place going forward to ensure that priority areas of this issue are identified and addressed, and that current procedures are reviewed and updated. If barriers to access will be examined in LEA monitoring, this should be described. It was also observed that the SEA did not meet all requirements because career and technical education, magnet schools, and charter schools are not described in the plan. Furthermore, the plan does not describe how the SEA and LEAs will ensure that students do not face barriers to accessing services for which they are eligible. Finally, the plan does not mention the monitoring of LEAs to ensure barriers are addressed at the local level.

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 has strategies to address problems encountered for children and youth experiencing homelessness, but one panelist observed the plan lacks details about the nature of the trainings and the content priorities for targeted audiences.
<i>Strengths</i>	The peer review panel observed the plan’s strengths are: that the SEA collaborates with the State HHS agency on immunization records; that the State school code addresses barriers stemming from residency requirements; the inclusion of issues resulting from uniform policies; that LEAs are required to have policies regarding homeless students and residency; and that these polices are part of LEA monitoring.
<i>Limitations</i>	The peer review panel observed that the plan is very general with respect to its statements on training and technical assistance, and that there is no information included in plan whether enrollment delays are a problem and, if so, what aspect of enrollment delays need to be addressed. It was observed that the plan does not discuss whether State or local policies currently exist regarding procedures and timelines for transferring school records. Furthermore, the peer review panel observed that the plan could contain more description of State or local policies impacting immunization, birth certificates, guardianship, and transfer of school records and how these will be documented and monitored. Finally, it was observed that the plan could be improved by including more details about training opportunities available, what priorities will be established for training and targeted audiences.
<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>	There was a difference in opinion among the peer review panel about whether the plan demonstrates that the SEA and the LEAs in Michigan will review and revise its policies that pose barriers to homeless children and youth. Specifically, while it was observed that the bimonthly meetings described in the plan will provide an opportunity to discuss policies and procedures, it was observed that the plan could specify that more directly.
<i>Strengths</i>	The peer review panel observed that strengths of the plan are: that the State school code contains a demonstration of the removal of barriers; that LEA monitoring examines local policies and procedures; that the State Coordinator is collaborating with pertinent agencies to revise licensing regulations; and that there is work planned to address fees, fines, absences, and granting credit.
<i>Limitations</i>	The peer review panel observed that the plan indicates that MDE will ensure that State code addresses fees, fines, and absences, but observed the plan does not describe how that will be done.
<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 the SEA did not meet all requirements of this section of the plan because it does not describe how or when the SEA will review and revise its policies to remove barriers. The plan could be improved by not only mentioning the revised State school code, but by addressing what specifically will be included in the code.

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 describes many practices in place to assist youth experiencing homelessness to prepare and improve their readiness for college. However, it was also observed that much of this section of the plan describes current efforts to prepare counselors (in high school and higher education) to advise homeless youth, while there is much less attention paid to what will be done moving forward – will current efforts simply be maintained or are additional strategies planned? The plan would benefit from additional detailed information in this regard.
<i>Strengths</i>	The peer review panel observed the plan’s strengths are the State Coordinator’s involvement with MCAA, MCAN, and FYIT to leverage their networks and resources. Meanwhile, it was observed that a significant strength is that the State possesses a McKinney-Vento Higher Education network.
<i>Limitations</i>	The peer review panel observed that the plan’s limitations is that it addresses more of what is taking place at the college level rather than the high school level, and that it also primarily describes what has been done to-date.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3) <input type="checkbox"/> No
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	