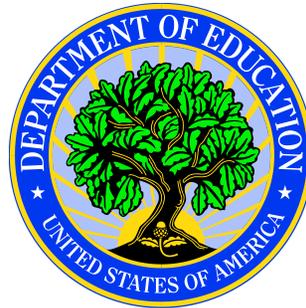


STATE PLAN

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

State Name: Minnesota



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>	Peer reviewers observed that the State’s plan described how local identification and assessment will be carried out, but suggested that the plan needs more detail regarding a description of expected outreach activities that LEAs should undertake, how identification is reviewed during monitoring, and discussion of how needs assessment is conducted at the State level. It was noted that the SEA described a level of compliance with the statute, but that the narrative did not clearly identify local practices.
<i>Strengths</i>	Peer reviewers saw strengths in the State plan’s discussion of professional development provided to LEAs by the SEA (required training of McKinney-Vento LEA Homeless Liaisons every three years).
<i>Limitations</i>	Peer reviewers questioned whether the housing questionnaire used by LEAs is a requirement from the SEA and noted that the local procedure described appears to be reactive; it assumes the liaison is contacted by a family or otherwise receives information. Reviewers noted that the plan did not discuss more proactive outreach procedures, such as placing posters and brochures in schools and shelters or working with community agencies serving homeless families. Also, the plan did not include a discussion of how SEA monitoring includes a review of identification and assessment efforts, or how the State Coordinator identifies trends in students’ needs that would call for a Statewide response. While local homeless education liaisons in the State receive training every three years, it was unclear how new liaisons are trained and on-boarded.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1) Reviewer <input checked="" type="checkbox"/> No (2) Reviewers
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	Peer reviewers indicated that the State’s plan could be strengthened by a more complete description of expected local outreach procedures, SEA monitoring of local data and procedures, and additional information regarding how a State-level needs assessment is conducted.

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>	Peer reviewers observed that the State’s plan described procedures for the prompt resolution of disputes for homeless children and youth, but that key components were missing such as a review of local dispute processes and resolution timelines.
<i>Strengths</i>	Peer reviewers saw strengths in the State plan’s discussion of forms available to parents online, ensuring a portal of access to the dispute resolution process. Additionally, it was noted that each LEA is required to have a local dispute resolution process.
<i>Limitations</i>	Peer reviewers noted that the plan did not describe the required components for the local dispute resolution process such as notification of parent rights, requirements for immediate enrollment and transportation, timelines, and communication requirements, nor did it describe how the local process will be reviewed through monitoring or other procedures. Reviewers also were unclear whether or not model local policies or sample forms and letters are made available to LEAs.
<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>	Peer reviewers indicated that the State’s plan could be strengthened with a description of the required components of the dispute resolution process, including immediate enrollment and transportation during the dispute, and timelines to ensure prompt resolution at the State and/or local level.

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>	Peer reviewers observed that, while the SEA is to describe programs to heighten the awareness of such school personnel of the specific needs of runaway and homeless children and youth, the plan did not describe how liaisons will be trained and what information and support is available outside of training events.
<i>Strengths</i>	Peer reviewers saw strengths in the State plan’s description of professional development opportunities and collaborations, noting that presentations are given at State association conferences for various role groups (including specific training for early childhood personnel) and that technical assistance is provided upon request, or when a need is indicated as a result of SEA monitoring (the plan references Title I monitoring).
<i>Limitations</i>	Reviewers noted that the State plan did not specifically reference training provided to local homeless liaisons and there is no description of information resources (briefs, publications) for various role groups, nor discussion of how monitoring examines success in reaching school personnel with appropriate information and training. Also, reviewers noted that the narrative focused on access to the Title I, Part A set-aside, but does not include other State or local resources or practices. The SEA mentioned that there are early childhood scholarships available, but did not explain how this increases awareness about the needs of homeless children and youth for teachers, principals, attendance officers, enrollment personnel and specialized instructional support personnel. Reviewers also noted the wide dissemination of a Minnesota State Homeless Study, but were unclear of the intended audience or relationship to this requirement.
<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</i>	Peer reviewers indicated that the State’s plan could be strengthened by describing specific training made available for liaisons and how it is documented, including strategies for providing information and training to other school personnel who do not attend the State conferences. Additionally, reviewers noted that the SEA should describe how monitoring examines training and information dissemination activities.

requirement

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>	Peer reviewers observed that Minnesota State Statute (Section 124D.15) ensures coordination of services for McKinney-Vento eligible preschool students. However, reviewers noted that the plan did not describe the actual procedures that will be followed to identify homeless children of preschool age.
<i>Strengths</i>	Peer reviewers saw strengths in the State plan's description of coordination of services for preschool homeless students, particularly the potential 5% set-aside for families who are experiencing homelessness. Additionally, preschool enrollment applications have been revised to include the McKinney-Vento definition of homelessness.
<i>Limitations</i>	Peer reviewers noted that the State's plan described training and outreach relative to the provisions of McKinney-Vento. However, the plan did not outline who receives this training, who provides it, and how often it is provided. Additionally, the plan did not describe the outreach and identification activities that are expected to occur at the local level or how this will be monitored.
<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>	Peer reviewers indicated that the State's plan could be strengthened by providing additional details on the actions and policies in place to ensure that young children experiencing homelessness have access to public preschool. Reviewers also noted that the plan should discuss how preschool personnel, along with other target audiences, are included in McKinney-Vento training opportunities. Reviewers suggested that monitoring processes should be explained and that the types of preschools available – State funded, Title I, Head Start – should be clarified.

- **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 State’s plan did not provide a description of its procedures to ensure homeless students are accorded equal access to appropriate secondary education and support services concerning credit for full or partial coursework completed while attending a prior school. Reviewers noted that, while the plan described alternative learning opportunities, it did not address how homeless youth are identified or how barriers related to credit accrual or recovery are addressed.
<i>Strengths</i>	The description of the State’s alternative education program was identified by the peer reviewers as a strength in the State’s plan, noting that the program is available year-round and may be offered both during the day and after school.
<i>Limitations</i>	The peer reviewers were unable to note strategies to identify and enroll homeless youth and found no discussion of current policies addressing full or partial credit. The State’s plan described its alternative education programs, but indicated that the targeted services are for kindergarten through eighth grade and not secondary education.
<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>	Peer reviewers indicated that the State’s plan could be strengthened by including expected activities for outreach and identification of homeless youth, including policies related to full or partial credit for coursework completed at prior schools. Reviewers also noted that the plan should address the relationship between alternative education programs and secondary schools in the State.

- **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>	Peer reviewers observed that the State’s plan did not describe procedures in place to ensure homeless children and youth do not face barriers to accessing academic and extracurricular activities. Reviewers noted that the plan referenced school policies being assessed, but did not describe what the policies are, or how the assessment takes place.
<i>Strengths</i>	Peer reviewers saw strengths in the State plan’s discussion of technical assistance provided by the State Coordinator and in the referenced assessment of school policies and procedures.
<i>Limitations</i>	Peer reviewers noted that there the plan did not discuss current policies in place at the State or local level, nor is a process described for how policy reviews will be conducted. Additionally, it did not describe how information dissemination and training are used to raise awareness of requirements regarding access to academic and extracurricular opportunities. It was also unclear to the reviewers how the SEA monitors for compliance.
<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>	Peer reviewers indicated that the State’s plan could be strengthened by further discussion of State policies and expectations for appropriate district/school policies, including how these will be reviewed. Furthermore, reviewers recommended that the plan include details on how school personnel will gain the information they need to ensure access for homeless students to academic and extracurricular programs, including magnet schools, summer school, career and technical education, advanced placement, online learning, and 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>	Peer reviewers observed that the State’s plan repeated the statutory language, but it did not provide a description of the processes in place to ensure enrollment or obtain missing documents. While training is referenced, the reviewers were unable to determine how the related goals are achieved, how compliance is tracked, or how the State will monitor for compliance.
<i>Strengths</i>	Reviewers saw strengths in the State plan’s description of the expectations for each barrier listed, including that immediate enrollment is assured. Also, the SEA mentions the use of the Title I, Part A set-aside funds to assist with dress code requirements.
<i>Limitations</i>	Reviewers were unclear if the plan for immediate enrollment without immunization records is a State law or LEA policy, and whether the SEA follows up or monitors to ensure students are exempt and/or have started the immunization schedule. Additionally, reviewers noted that the plan did not provide strategies for how barriers will be removed or how missing documents – immunization records, birth certificates, and school records - will be obtained.
<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>	Peer reviewers indicated that the State’s plan could be strengthened by providing additional details on how the SEA will ensure that homeless students do not face barriers relative to the requirement, noting that the plan narrative provides an assurance rather than detailing policies or strategies. Reviewers also noted that the plan would benefit from additional information to clarify who receives training relative to this requirement, how often, and by whom.

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>	Peer reviewers observed that the State plan’s narrative for this requirement described professional development and training, but did not describe policies. Reviewers also noted that timelines for policy review were not discussed, and noted that the items listed in the requirement were not fully addressed.
<i>Strengths</i>	The discussion of professional development and training relative to policies and procedures was noted by reviewers as a strength in the plan.
<i>Limitations</i>	Reviewers noted that the plan did not mention a process to review and revise State policies, nor a description of a process for how local policies will be reviewed or revised. Reviewers noted that few details are provided relative to training, for example, how often and in what format(s). Peer reviewers observed that the plan was not clear regarding how the SEA will monitor this requirement for compliance or regarding policies or procedures to remove barriers due to fees, fines, or absences.
<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>	Peer reviewers indicated that the State’s plan could be strengthened by fully describing the policies and/or procedures to address barriers due to outstanding fees, fines, or absences, and the process for reviewing and revising policies. Additionally, peer reviewers recommend further description of the training provided to local personnel and the process for monitoring this requirement.

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>	Peer reviewers observed that the State’s plan included a description of the types of assistance homeless youth will receive to help them prepare for college. It was also noted that the SEA requires a personal learning plan for all students, regardless of homeless status, that assists students with meeting graduation requirements, and setting career and college goals. However, it was observed that the plan did not describe how counselors and other staff will be prepared to address the needs of homeless youth.
<i>Strengths</i>	Peer reviewers saw strengths in the State plan’s description of the personal learning plan process (which begins no later than the 9th grade). Homeless youth also receive assistance with the FAFSA and other college preparatory activities.
<i>Limitations</i>	Peer reviewers noted that the plan did not discuss the resources or training available to ensure that school counselors and others are prepared to meet the needs of homeless students in preparing them for college. It was also noted that the narrative was unclear about the status of unaccompanied homeless youth for the FAFSA.
<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 noted that the plan could be strengthened by describing how school counselors (and other staff, if applicable) will receive the resources and training needed to advise and support homeless youth in preparing and applying to college.