

STATE PLAN
Composite Notes
for the McKinney-Vento EHCY Program

State Name: Missouri



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>	The peer reviewers observed that the State plan included an electronic data collection and submission process that meets the identification procedures and needs assessment requirement. The data collection happens through MOSIS and happens throughout the year to ensure updated numbers.
<i>Strengths</i>	The peer reviewers identified strengths in the State plan’s description of the basic data collection process which happens regularly through MOSIS and includes five data submission dates from LEAs. It indicates data collection at the individual level, including a student’s status as homeless. Additionally, it references the LEA needs assessment for homeless students. Throughout the plan, identification strategies are also mentioned. Also noted was that the SEA provides educational rights posters, the updating of the list of homeless education liaisons, posting of guidance, and professional learning. The peer reviewers also observed that the plan referenced an administrative manual containing information on identification and the process for monitoring the identification of homeless children and youth.
<i>Limitations</i>	It was observed that the State’s plan did not describe procedures for identifying students or how identification occurs. It described the update in MOSIS, but did not clarify what to do regarding students who are not in MOSIS, the immediate support of students who are in a homeless situation, or designate whose role it is to properly identify students as homeless. The State plan did not describe how data are used to determine the reasonableness of the identification done at the local and State level. The plan states that LEAs assess needs, but needs assessment procedures were not described at the LEA or SEA level.
<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</i>	The peer reviewers indicated that the State plan could be strengthened by including specificity regarding professional development, outreach activities, collaboration, and policies at the SEA level. The plan should describe specific procedures used in the identification process. These could include descriptions of training, sample residency questionnaires, how monitoring addresses local identification

<i>to fully meet this requirement</i>	efforts, and reasonableness of counts, as well as protocols for identifying students from registrations forms, and other forms of initial identification such as community services referrals. Assessing needs requires a description of procedures for the local and State levels and could include training, agency collaboration, and data analysis.
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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 reviewers observed that the State plan included a dispute resolution process including what issues can be disputed and where a student should attend school during a dispute. However, it was noted that the process wasn't clear that a prompt resolution would occur should the full process be needed.
<i>Strengths</i>	The peer reviewers noted strengths in the State plan's dispute resolution process which detailed the resolution and timeline for disputes. The plan delineated the steps to be taken in order to achieve a resolution of a dispute. Eligibility, school selection, and enrollment are identified as issues that can be disputed, and where the student should attend school during a dispute is stated.
<i>Limitations</i>	Reviewers observed that the State recommends the process described, but it was unclear to reviewers if an LEA can craft a different process and whether LEAs are monitored to ensure they have a process. Reviewers noted that both the recommended LEA process and SEA steps appeared to be complex and numerous and there are multiple levels of appeal at the State level with 30-day timelines, and the plan did not include a description of how the State monitors disputes or dispute policies and procedures. The dispute process may benefit from reflecting the statutory language under ESSA.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (2) Reviewers <input checked="" type="checkbox"/> No (1) Reviewer
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The peer reviewers indicated that the State plan could be strengthened by including how the State monitors compliance of LEA policies and how LEAs conduct disputes promptly and appropriately. The dispute processes should be reviewed and revised and easily accessible to families and youth experiencing homelessness.

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 reviewers observed that the State plan clearly described its practice of ensuring that homeless liaisons and other school personnel have access to the necessary information regarding homelessness. Programs included different types of mechanisms and a variety of audiences along with SEA collaboration efforts to meet the criteria. Reference to runaway youth was not listed explicitly, but reviewers observed that the plan described monitoring efforts to ensure these school personnel are reached.
<i>Strengths</i>	The peer reviewers noted strengths in the plan including the opportunities for professional learning, especially for local liaisons, as well as information dissemination from the SEA to the LEA on best practices and updates through a variety of modalities including webinars, technical assistance, and professional learning tools. The State website posts liaison lists, trainings, and resources, and the SEA State maintains an administrative manual for the homeless education program which provides guidance to localities. The State is in the early stages of adapting online professional development modeled after the Michigan online liaison certification program. The SEAs plan for dissemination and creating a bank of supports (through its website) increases accessibility to information.
<i>Limitations</i>	It was noted that while the State’s plan indicates significant collaboration at conferences by the SEA, it was unclear how the SEA disseminates information to each of these stakeholders. Additionally, the narrative did not provide a direct reference to runaway youth specified in the requirement, nor was there a description of how liaisons will be supported to provide professional development to all staff who serve students experiencing homelessness. Also, the plan did not describe how this professional development will be monitored or how liaison compliance with State-identified training will be tracked.
<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</i>	

<i>an SEA must provide to fully meet this requirement</i>	
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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 reviewers observed that the State plan outlined SEA procedures to ensure access to public preschool programs, and that preschool identification and school of origin transportation are addressed through training and monitoring. However, it was unclear how the State’s collaboration among programs and agencies specifically support access to preschool for children experiencing homelessness.
<i>Strengths</i>	The peer reviewers noted strengths including that the State included identification of preschoolers experiencing homelessness and school of origin transportation to preschool in training and LEA monitoring. The plan included information on collaboration, professional learning, identification, the monitoring of policies and procedures, transportation and several other barriers to access public preschool programs. It was also noted that there was indication of SEA collaboration with Head Start and other State agencies to promote access as well. The plan ensured that both the Missouri Head Start Office and the Missouri Office of Education sit on the Governor’s Task Force on Homelessness. Also, the plan described that the SEA recognizes the responsibility to remove barriers for homeless students under Part B of IDEA.
<i>Limitations</i>	It was noted that the plan described collaboration among State preschool programs, but it was unclear to reviewers if there is any specific homeless collaboration. The State Coordinator and Head Start Collaboration Office serve on the Governor’s Task Force on Homelessness but the State plan did not describe collaborative initiatives to serve preschoolers.
<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>	The peer reviewers observed that the State plan’s flexibility in credit accrual for all students should benefit homeless youth, although the plan wasn’t clear to reviewers regarding efforts to ensure homeless youth benefit from these options. The plan stated the need to ensure equitable transfer of credits for LEAs with students experiencing homelessness and offers examples of how this should be done. However, peer reviewers observed the plan didn’t include a description of procedures to reach youth separated from public schools. While the State allows locally-developed procedures to be implemented, it would be strengthened by including how the SEA ensures these are implemented and followed at the local level.
<i>Strengths</i>	The peer reviewers noted strengths including that the flexibility in the described credit accrual for all students has potential to benefit youth experiencing homelessness. The SEA described a variety of procedures compliant with State, local and school policies, which allow flexibility in awarding credit for full or partial coursework satisfactorily completed while attending a prior school. The examples given describe the requirement for LEAs to address students who need credits transferred.
<i>Limitations</i>	It was noted that the plan did not address how this flexibility is proactively made available to homeless youth. For example, the plan did not describe how liaisons are made aware of these options and how to advocate for such flexibility for homeless youth. Neither the Grant Manual (link provided in the application) nor the description includes the procedures the SEA utilizes to ensure this requirement is met. While it provides a strong overview of general, statewide procedures on credit transfer and accrual, the plan did not include a description of how the SEA assures this occurs at the LEA or ensures progress is made.
<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</i>	The peer reviewers indicated that the plan would be strengthened by including information on an actual procedure it utilizes to ensure youth are identified and accorded equal access, including credit accrual. It also should address youth separated from school and proactive procedures to ensure youth separated from school have access to the credit accrual flexibility. Collecting baseline data, such as the adjusted

to fully meet this requirement

cohort graduation rate, could be used to track progress.

- **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 reviewers observed that while some of the activities, the plan didn't include many of the academic and extracurricular activities in the requirement, or a description of procedures which ensure equal access.
<i>Strengths</i>	Peer reviewers noted that the comprehensive services portion of the plan states that homeless students are not segregated and references career education and several other programs.
<i>Limitations</i>	Reviewers observed that the plan did not provide all of the information included in the requirement. The monitoring process outlined on page 12 of the manual (link provided in the application) did not clearly address how the SEA ensures the removal of barriers, and it was unclear to reviewers if this includes extracurricular activities and other programs, such as those outlined in the 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 requirement</i>	Peer reviewers indicated that the SEA plan would be strengthened by clarifying how it ensures compliance with this requirement. This requirement could be met through the inclusion of district assurances, how the SEA monitors for compliance, or any other procedure utilized to ensure the removal of these barriers.

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 reviewers observed that the State described support for the removal of enrollment delays for several facets of this requirement. However, reviewers noted there was limited description of strategies to address enrollment barriers or how the State monitors the extent of enrollment delays, and also that some barriers were not referenced in the narrative.
<i>Strengths</i>	The peer reviewers noted that the plan included strategies regarding the SEA’s activities surrounding some requirements, citing State statutes that support addressing these issues. Procedures related to immunizations and health records are described, State code is referenced for residency requirements, and local liaisons will assist with school records.
<i>Limitations</i>	It was noted that the plan did not mention the removal of barriers related to guardianship, uniform or dress code requirements, whether these issues are causing enrollment delays or how the State tracks such information. Additionally, while strategies such as code reference and stating liaisons must assist to obtain missing documents are included, additional strategies to address the requirement were not provided.
<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>	The peer reviewers indicated that the plan would be strengthened by including a discussion on how all problems listed in the requirement are addressed with a description of strategies, such as training, monitoring, and data analysis. Detailed strategies regarding how liaisons will assist or whether these are issues to contend with in the State are also needed.

I.6: Policies to Remove Barriers (722(g)(1)(I) of the McKinney-Vento Act)

- **Does the SEA demonstrate that the SEA and LEAs in the State have developed, and shall review and revise, policies to remove barriers to the identification of homeless children and youth, and the enrollment and retention of homeless children and youth in schools in the State, including barriers to enrollment and retention due to outstanding fees or fines, or absences?**

	<i>Peer Response</i>
<i>Peer Analysis</i>	The peer observed that the State plan was unclear as to whether or not it provided enough description to meet this requirement in each of the areas referenced. Reviewers noted strengths in the monitoring process and oversight of identification plans, while also noting that the plan did not describe fees or absences.
<i>Strengths</i>	The peer reviewers noted as strengths that the State monitoring process is included in the plan, along with the description on page 12 of the administrative manual, which outlines the development and review of policies to remove barriers. The SEA also described its oversight of LEA identification plans for students.
<i>Limitations</i>	It was observed that the monitoring and State review was included, but the plan did include information on outstanding fees or absences and what actions have or will be taken. The monitoring of policies suggests that policies are revised to assure compliance with the latest federal requirements, but the plan did not include a description regarding the revision of policies.
<i>Did the SEA meet all requirements?</i>	Yes (2) Reviewers 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 would be strengthened if it ensured that part of the expectation of LEAs is when non-identified students are discovered, they are afforded all opportunities under the McKinney-Vento Act, and provides policies to remove barriers to outstanding fees or absences.

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 reviewers observed that the SEA plan stated that the LEA liaison is responsible for ensuring that homeless students receive assistance from counselors. However, although there is evidence of advocacy on the part of the liaison, the plan was unclear to reviewers on how youths will receive assistance from counselors beyond collaborating with the local liaison. It was also noted that the plan did not describe how youth will receive assistance from counselors.
<i>Strengths</i>	The peer reviewers noted that the plan referenced the liaison’s responsibility to ensure counselor support and to assist with advocacy in this area.
<i>Limitations</i>	It was observed that the plan did not include a description of how students will receive assistance beyond advocacy by the liaison, or identify when homeless students will receive counseling support or identify how the students would be supported throughout the year.
<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>	The peer reviewers indicated that the plan could be strengthened by providing a description of how youth will receive assistance from counselors and the role of the SEA. Activities to support this section may come in the form of including trainings for school counselors, State collaboration to support counselor assistance, monitoring for compliance, explaining how progress will be tracked, a description of fee waivers, current State statutes, or any requirement which includes college readiness assistance from counselors such as an individual graduation plan.