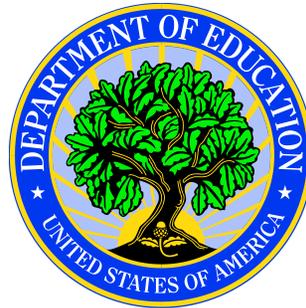


STATE PLAN

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

State Name: Montana



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 the procedures it will use to identify homeless children and youth, and outlined their EHCY program. However, while the plan discussed identification and assessment, it was noted that the plan did not provide detail regarding what is expected to take place at the local level, how it will be monitored, and how liaisons will be adequately prepared for their responsibilities.
<i>Strengths</i>	Peer reviewer identified strengths in the State plan’s discussion of the Montana multi-tiered system of support, particularly as it relates to the education of homeless children and youth. Also, it was noted that homeless student data is collected through the State’s Achievement In Montana (AIM) database, and that the State is working to address the unique needs of its rural and urban American Indian populations who are experiencing homelessness. Reviewers also observed that local liaisons will coordinate with other agencies on identification and see that community needs assessments are conducted. Finally, it was referenced that the State Coordinator works with schools near reservations, requires LEAs to make referrals to Head Start and Tribal Head Start, and frequently utilizes resources from the National Center for Homeless Education.
<i>Limitations</i>	Reviewers indicated that the State’s plan did not describe what method was used, or how often the State Coordinator works with its LEA Homeless Liaisons. Additionally, it was noted that the SEA relies on LEAs to identify homeless children, but did not describe expected activities for outreach and identification. It was also observed that the plan did not discuss reviewing identification procedures during monitoring, and although training for LEAs is mentioned, it is not described in detail.
<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</i>	It was noted that the State’s plan could be strengthened with additional detail regarding the training and assistance liaisons will receive on identification strategies. This could include a description of the kinds of activities that all LEAs are expected to employ to identify homeless children and youth and a

<i>an SEA must provide to fully meet this requirement</i>	discussion of how local procedures will be reviewed during monitoring.
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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>	Peer reviewers observed that the State’s plan described the dispute resolution process, but it was missing key components and did not describe a mechanism for review of local procedures by the SEA.
<i>Strengths</i>	Peer reviewers identified strengths in the State plan’s discussion of dispute resolution documents provided to LEAs and that the SEA uses a three-member panel to review and investigate homeless disputes once they reach the State level.
<i>Limitations</i>	Reviewers noted that the dispute resolution policy at the State level appears to be applicable to multiple types of disputes, and that it was unclear whether the same process could be used to address the unique needs of homeless children and youth (relative to school of origin, immediate enrollment, timelines and transportation). Reviewers also observed that, while LEAs are required to have a policy, the minimum acceptable elements of the policy are not described, nor is a description given for how local policies will be reviewed.
<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 greater detail on the components required for local dispute resolution policies and how local policies will be reviewed for critical elements such as school of origin rights, immediate enrollment, and transportation.

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 the State’s plan described programs that would heighten the awareness among school staff, but it did not provide specific details regarding how this will actually occur and how participation will be documented and monitored.
<i>Strengths</i>	Peer reviewers identified strengths in the State plan’s requirement that local liaisons participate in professional development annually and in the topics to be covered (trauma, poverty, child abuse, and homelessness).
<i>Limitations</i>	Peer reviewers noted that more detail is needed regarding how the liaison training will be delivered. The plan lists various providers, but not the mechanisms (other than webinars) and did not discuss how liaison participation will be documented. It was also noted that the plan stated that all school personnel must receive annual professional development, but did not describe how that will occur, what information resources and training are made available to the various groups, and whether participation is reviewed during monitoring.
<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 describing specific training made available for liaisons, including how it is documented and monitored. Reviewers also noted that information related to the training of other school personnel is needed.

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 the State’s plan described promising collaborations and affirmed that homeless children will receive priority for preschool, but did not describe the actual procedures that will be followed to identify homeless children of preschool age.
<i>Strengths</i>	Peer reviewers noted the State Coordinator’s collaboration with a variety of State-level organizations, including the Montana Best Beginnings Advisory Council and the Head Start Collaboration Office.
<i>Limitations</i>	Peer reviewers indicated that while the State Coordinator has several collaborations in place, it is unclear how these will translate to preschool-age students having greater access to preschool programs, and whether the State provides other forms of public preschool programming such as State-funded or Title I-funded.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1) Reviewer <input checked="" type="checkbox"/> No (2) Reviewers
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	Reviewers indicated that the State’s plan could be strengthened by discussing the activities that result from the various collaborations and coordination, including a description of the kinds of outreach and identification activities for homeless preschool children expected of districts, and how this will be reviewed during monitoring.

- **Does the SEA describe procedures that ensure that homeless youth and youth separated from public schools are identified and accorded equal access to appropriate secondary education and support services, including by identifying and removing barriers that prevent youth described in this clause from receiving appropriate credit for full or partial coursework satisfactorily completed while attending a prior school, in accordance with State, local, and school policies?**

	<i>Peer Response</i>
<i>Peer Analysis</i>	Peer reviewers observed that the plan’s narrative provided a description of the collaborative efforts of the State Coordinator to address this requirement, but the State’s plan did not describe procedures that prevent homeless students from facing barriers regarding appropriate credit for full or partial coursework.
<i>Strengths</i>	Peer reviewers noted the State plan’s discussion of collaboration between the State Coordinator and the Office of the Commission of Higher Education and with Alternative Education Centers, noting that each LEA must have procedures to ensure full or partial credit for work at a prior school.
<i>Limitations</i>	Peer reviewers observed that while the SEA provided an assurance that all LEAs will have procedures to ensure that students receive full and partial credit, there the plan did not describe the outreach and identification procedures that LEAs are expected to undertake, or discuss how the adequacy of local credit accrual and credit recovery procedures will be reviewed.
<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 specific details on the minimum acceptable identification activities expected of all LEAs and what the SEA will do to provide specific resources, arrange or conduct training for key constituencies, and monitor the outcome of local identification efforts.

- **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 described procedures to assist homeless students with access to some of the categories in the requirement, namely athletics and career and technical education, but the plan did not address each of the areas referenced.
<i>Strengths</i>	Reviewers identified strengths in the State plan’s discussion of collaboration with the Montana High School Association (MHSA), the Career and Technical Education Division, and local student support entities such as the YMCA and the United Way. This coordination can provide homeless students with financial support and needed materials to ensure their participation.
<i>Limitations</i>	Peer reviewers noted that the plan did not address what procedures are in place for programs such as magnet school, summer school, advanced placement, online learning and charter school programs.
<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 plan could be strengthened by addressing how the SEA will review State and local policies and procedures to ensure homeless youth have access to and participate in the listed academic programs. If barriers will be examined in LEA monitoring, this should be described, and if training on this issue will be offered, the method(s) and target audience(s) should be included.

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 described the procedure for each barrier noted, and listed a variety of strategies to reduce barriers to enrollment, including State statutes that assist with records release and guardianship.
<i>Strengths</i>	Peer reviewers noted strengths in the plan’s discussion of how LEA liaisons work with families to assist with health record retrieval and enrollment in Medicaid, and in the State statutes that govern the timeline for the release and transfer of records and the Caretaker-Relative Affidavit (that can be used in situations where the parent or guardian is not present).
<i>Limitations</i>	Peer reviewers indicated that the plan did not state that students must be immediately enrolled and did not describe the method(s) by which the State Coordinator informs school personnel of appropriate procedures to be followed. Reviewers also noted that it was unclear how the SEA tracks and monitors for compliance relative to this requirement.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3) Reviewers
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

I.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’s plan demonstrated a number of collaborative efforts between the SEA, LEAs and other educational programs, but did not address all of the required components outlined in the requirement. Reviewers noted that the plan contains a process for reviewing State policies and procedures, but did not address how local policies and procedures will be reviewed.
<i>Strengths</i>	Peer reviewers saw strengths in the State Homeless Coordinator’s provision of written guidance documents to LEAs and in the collaboration with other specific support programs that provide services to homeless students (including Title I, Part A, Title III, Migrant, IDEA, and Indian Education). Additional strengths included the State Coordinator review of State policies and procedures annually, in conjunction with other program persons and with LEA input, and that Montana Code prohibits LEAs from holding student records for fines or fees.
<i>Limitations</i>	Reviewers noted that the State’s plan did not demonstrate how local policies and procedures are reviewed and revised, and that barriers due to absences are not addressed. Additionally, the plan did not describe the timeline for written guidance to LEAs or provide a description of how it will be distributed.
<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 describing how local policies are reviewed during monitoring and discussing State or local policies that remove barriers due to absences. It was also noted that the plan could provide more detail about the written guidance under development and how it will be distributed.

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 provided an outline of how counselors will be supported in working with homeless students, but that more detail is needed regarding the services and supports that homeless students will receive from counselors. It was noted that the SEA is working with the Montana School Counseling Association (MSCA) to provide training and support for counselors to work with homeless children and youth relative to this requirement.
<i>Strengths</i>	Peer reviewers identified strengths in the State plan’s discussion of collaboration with the MSCA and in the use of webinars provided by the National Center for Homeless Education, the American School Counseling Association and the Teaching and Learning Hub.
<i>Limitations</i>	Peer reviewers noted that the plan did not describe when planning for students will commence, how counselors will assist students who need additional support to improve their readiness for college, how help with the FASFA will be provided, or how individual plans for college bound students will be developed. Reviewers also noted that more detail regarding the training of counselors is needed, and that it was unclear how the SEA will monitor and track compliance for this requirement.
<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 providing additional details on the collaboration with MSCA, the information and training resources available for counselors, and the SEAs plan for documenting and monitoring implementation of this requirement. Peer reviewers also noted a need for specific information regarding the kinds of support that counselors will provide homeless students relative to the requirement.