

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

State Name: North Carolina



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 found that the SEA described how local identification and assessment efforts will be supported and monitored by the State Coordinator as well as the procedures the SEA will use to assess student needs. The roles and activities of the State Coordinator were described and included assessing needs, conducting training/forums/institutes/regional roundtables, collecting and analyzing homeless student data, updating and maintaining webpage, disseminating educational rights posters, collaborating with other federal program partners, and monitoring to ensure compliance. Reviewers observed that the description of the liaison activities was provided but stated that more detail is needed in the discussion of expected types of identification activities that LEAs should undertake.
<i>Strengths</i>	The peer reviewers noted strengths in the plan including that the SEA provided an action plan in the State’s annual needs assessment that provides many opportunities for professional development and resources for use at the local level. The action plan also included monitoring specific program implementation and site visits related to identification. District homeless liaisons will include in their needs assessment the procedures for awareness, identification, and assessment of needs, and NCDPI will work with a variety of agencies and other federal education programs to raise awareness and collaborate on identification efforts. It was also noted that local liaisons conduct individual needs assessment upon enrollment and this data is aggregated by the State Coordinator into a State needs assessment to identify issues to address in training and monitoring. Also, the SEA works with other federal, State and local-level agencies and reviewed State policies and laws that intersect with homelessness.
<i>Limitations</i>	Reviewers noted areas where the description in the plan could be expanded. The description of how the NCHPEP coordinates with LEA food service programs in the identification of homeless students as well as with some of its community partners was minimal. The plan also did not provide specifics regarding the expected set of actions that liaisons should take to ensure that identification efforts are thorough. Reviewers also noted that the plan’s narrative did not indicate whether a standard enrollment form or

	procedure is used across LEAs, helping to ensure consistency in the data collected. Links to the LEA procedures to increase awareness and identification would strengthen the plan as well.
<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.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 noted that the SEA has a well-constructed dispute resolution procedure adopted as State Board policy and provided a link to the procedure in the State plan. LEAs are also provided comprehensive information and resources to develop their local procedures, which are reviewed for appropriateness.
<i>Strengths</i>	The review panel identified strengths in the plan, including that the summary of the Dispute Resolution Process in the plan’s narrative section was a procedure subsequently adopted as State Board policy, addressing the right to dispute an LEA’s decision on eligibility, school selection, and enrollment, and includes timelines and communication requirements. The State policy is reviewed annually by the NCHPEP leadership team, which makes information available to LEAs, and the State Coordinator provides sample letters and other resources – including a dispute handbook – to help ensure consistency across districts. Local dispute plans are reviewed by the State Coordinator and are also checked during monitoring.
<i>Limitations</i>	Peer reviewers noted areas of limitations, including that although the plan mentions the policy has been revised, the dispute resolution process and procedure link in the plan refers to the process that was in effect as of October 1, 2006, but it is not clear that it fully addresses eligibility. Clarification is needed as to whether there has been a revised and adopted dispute resolution process since ESSA went into effect and, if so, an updated link should be provided. Additionally, the necessary forms were not linked to the website, and it was unclear how families will know the dispute process.
<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.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 plan described multiple means of delivering specific professional development to the various constituencies, using resources tailored to their position and responsibilities. The SEA provided a list of activities for school personnel that are designed to heighten the awareness of homeless students’ specific needs. Opportunities and resources available to heighten awareness include technical assistance, needs assessment, monitoring, a comprehensive website, posters, listserv notices, and other training materials. A process was also described for collecting data about training needs. Reviewers also noted that the greatest limitation in this section is the need for more detail about professional development taking place at the local level, and that while there are resources for local liaisons, the plan did not indicate how district level staff will be trained and informed.
<i>Strengths</i>	The peer reviewers saw strengths in the plan including that the plan shows that the SEA will place particular emphasis on the challenges (such as housing, academic services, State policies, and community services) that impact runaway and homeless youth. The plan provides options for professional development and support – annual regional meetings, new liaison training, and both web-based and on-site trainings. Participation is tracked and non-attendees receive follow-up contact. The State Coordinator provides training materials and other resources for the various audiences tailored to their position and responsibilities. The State-level needs assessment is used to identify issues to address in training and technical assistance. In addition to State-level activities, local homeless liaisons will also track barriers and monitor these youths’ academic progress and attendance and provide additional consultation and support to them.
<i>Limitations</i>	The peer reviewers noted that more detail is needed on how the local professional development targeted at specific groups (such as administrators, counselors, and transportation staff) will be carried out and documented. The activities appeared to be focused on the local liaison, but reviewers indicated that the SEA needs to ensure that the local liaison is training principals, teachers, and others through monitoring, as the plan did not include a discussion of what role the liaisons have for local professional development, how they will be supported in carrying out that role, and how local professional development will be examined during monitoring. The plan would also be strengthened if the SEA

	provided an additional description of the specific activities; for example, topics of training and materials, web-based training, and State posters, and working with youth serving organizations would support collaboration and training.
<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.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 reviewers observed that the SEA described how the State Homeless Education Program will ensure that homeless children have the same access to early childhood and special education services by its collaboration with early childhood/preschool learning program partners. Training will be provided, tools developed, and technical assistance (TA) provided to LEAs and appropriate personnel. Comprehensive outreach to the community and providing training to the multiple constituencies that need to be involved in identifying and serving homeless preschool children was also noted. However, two reviewers expressed concerns that the plan’s narrative did not address the SEA or LEA procedures to ensure homeless children have access to eligible public preschool programs. It was noted clearer next steps to address identified barriers was needed in the SEA plan.
<i>Strengths</i>	The panel identified SEA outreach to stakeholders as a strength in the plan. Joint activities and resources with other offices, such as the Office of Early Learning, Head Start, and the Office of Exceptional Children, will extend the reach of identification and engagement efforts. Annual training and TA activities will engage key constituencies beyond liaisons. Preschool-age siblings are identified during enrollment of homeless children and youth. Additionally, the State Coordinator will review local board policies and procedures during monitoring and identify and remove potential barriers to homeless children accessing public preschool programs.
<i>Limitations</i>	The SEA’s narrative did not specifically address the SEA or LEA procedures for application, enrollment, prioritization, or transportation of homeless children in State or LEA-administered preschool programs. The narrative also did not state whether a standard enrollment form or procedure is used across LEAs. The peer reviewers noted that the plan would be strengthened if such links or copies to the procedures were included and, when barriers are identified, the SEA convened appropriate stakeholders to reduce the barriers.
<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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- **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 noted that the SEA described multiple strategies that it will use to identify and ensure access to appropriate secondary education and support services for homeless youth and youth separated from public school. These strategies included comprehensive and clear outreach to stakeholders, reviews of policies and procedures, development of strategies to improve graduation rates, training of appropriate personnel, consistent technical assistance, alternative educational opportunities, and transition to higher education. The plan also described how key staff will be involved in efforts to identify and support homeless youth, but did not provide detail about how that should occur at the local level.
<i>Strengths</i>	The SEA will train homeless liaisons, counselors, dropout prevention and other student support personnel on how to reach out to students not attending school regularly or considering dropping out. Training will focus on making up work, transferring completed credits (partial or full), alternative educational opportunities, and school official support. The State Coordinator will confirm programs and services are being provided to students for credit accrual and other educational opportunities during the LEA quality review process. The State Coordinator will also work with other State divisions to provide consistent guidance on identifying and enrolling youth. Access to online courses, summer school and tutoring for credit recovery are available and records are reviewed during monitoring. Also noted was the inclusion of a discussion on outreach and connections with the single point of contact and other school staff.
<i>Limitations</i>	Reviewers observed that the SEA did not describe the specific outreach procedures it uses to ensure that homeless youth and youth separated from public schools are identified and accorded equal access to appropriate secondary education and support services. Other than a review during monitoring, detail was not provided regarding how the State will ensure LEAs develop appropriate credit accrual and recovery policies and procedures.
<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</i>	The peer reviewers indicated that the plan needs to be more specific about the identification activities

<p><i>specific information or clarification that an SEA must provide to fully meet this requirement</i></p>	<p>for youth that is expected of all districts and what the State Coordinator will do to provide resources and training toward that end. The plan would be strengthened if the SEA included copies of or links to the specific procedures that it uses to ensure homeless youth and youth separated from public schools are identified and accorded equal access to appropriate secondary education and support services. If procedures do not exist at the SEA level, then the SEA should address how such procedures will be developed. More detail should be given as to how the State will assist LEAs in developing appropriate credit accrual and credit transfer policies and procedures.</p>
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- **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 the principal strategies to address access to academic and extracurricular programs to be ongoing training, forums, discussions, and technical assistance to LEAs, charter schools, and other programs overlapping with the education of homeless students. The SEA will monitor whether identified barriers have been addressed. While the plan included athletic associations in training, information sharing, and ideas to reduce barriers, the plan needed more detail about the development and review of local policies and procedures.
<i>Strengths</i>	The State Coordinator will identify local level model programs that have addressed academic and extracurricular challenges and highlight such programs at trainings within the State. The NC Homeless Education Program will also elevate its partnership with the NC Athletic Association to focus on the rights of homeless students and strategies for serving them. Liaisons will be provided with training and resources on access to academic and extracurricular programs, guided by data from the annual needs assessment, and student participation will be reviewed during monitoring.
<i>Limitations</i>	The SEA did not describe the specific procedures it uses to ensure that homeless children and youth have access to academic and extracurricular activities such as magnet schools, summer schools, and charter school programs. Participation is reviewed during monitoring, but the plan did not provide a specific discussion of whether the policies and procedures themselves will be examined.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1) Reviewer <input checked="" type="checkbox"/> No (2) Reviewers
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The plan would be strengthened if the SEA described more fully its procedures to ensure homeless children and youth have access to academic and extracurricular activities and included copies of or links to the specific procedures to address this area. The plan should also specifically address how the State will review and update State and local policies and procedures impacting access to and participation in each of the listed academic programs – magnet school, summer school, career and technical education, advanced placement, online learning and charter school programs – as well as extracurricular activities.

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 plan discussed the NCDPI’s Homeless Education program annually examines laws, regulations, practices, and policies that may result in enrollment delays. A list of activities was provided and included technical assistance, training, monitoring, and provision of other educational resources. It was also noted that while the plan stated that policies and regulations will be reviewed, it did not describe what policies and regulations currently exist at the State or local levels. The narrative addressed three of the five issues listed.
<i>Strengths</i>	The peer reviewers found the review of potential barriers to be a strength in the SEA’s plan. The SEA also reported that LEAs have decreased the number of students facing barriers and both LEAs and the SEA review potential barriers to enrollment, including immunization requirements and other health records, residency requirements, lack of birth certificates or other school records, and uniform or dress code requirements annually. Local documents are examined during monitoring and barriers are addressed in training and technical assistance.
<i>Limitations</i>	The plan did not describe any State policies that currently exist addressing the barriers listed. The plan mentioned that the liaisons and the State Coordinator review residency requirements, dress code, enrollment or discipline procedures, rules pertaining to outstanding fees, fines or absences, immunization, and other school documents. However, peer reviewers noted that the narrative did not address birth certificates or guardianship issues. In addition, the plan did not go into detail when it addressed strategies or provide specific strategies for guardianship issues. Peer reviewers also noted that the plan did not indicate what will be done if the annual review finds a policy that needs attention, nor did it indicate how the SEA will work with stakeholders to reduce barriers.
<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</i>	The plan would be strengthened if the SEA described which of the listed barriers are addressed in State law, policy, or regulation, and which are expected to be addressed by the district. For example, the plan would be strengthened if it included specific strategies for and references and links to laws pertaining to

<p><i>an SEA must provide to fully meet this requirement</i></p>	<p>immunization and other required health records residency requirements, and birth certificates, school records, or other documentation – and described the process for revising policies and procedures flagged in the annual review. The plan should provide more specifics about procedures to obtain the various documents listed and to resolve questions of residency and guardianship. Finally, the plan would be strengthened if it provided more detail about how training and technical assistance on removing barriers will be targeted to the locations and audiences where it is most needed.</p>
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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 plan suggested that the State has components in place to address the barriers cited, but that this should be spelled out more concretely. SEA and LEA homeless education policies were not included in the plan, except for the Dispute Resolution process. Mechanisms for review and revision at both State and local levels were provided. Collaborating and training with the Specialized Instructional Support Team (SIST) can help identify barriers in the LEA system.
<i>Strengths</i>	Peer reviewers noted that throughout the plan, the SEA described many activities for identification, enrollment, needs assessment, training and professional development, and access to services (including preschool) to identify and remove barriers for homeless children and youth. Additionally, the State Coordinator and the NCDPI Support Team review and discuss program and policy needs. State policy review is also conducted with the Program Leadership Team. Local monitoring includes review of local policies and procedures, with recommendations for needed revisions.
<i>Limitations</i>	It was noted that the narrative did not discuss whether there are existing State policies addressing enrollment and retention, including policies addressing fees, fines, and absences. Reviewers also observed that the plan did not discuss whether sample or model local policies are available for LEAs to adopt, and did not include established SEA and sample LEA policies. It was also noted that the plan needs more information on what happens if there are common barriers across the State, and how SEA and statewide systems will reduce the barriers.
<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 plan would be strengthened if the SEA included copies of the SEA and sample LEA policies or linked to them in the plan. The plan should also clarify how it ensures that policies described in the response to this requirement are developed, reviewed, and revised at the SEA and LEA levels. If policies do not exist at the SEA or LEA levels, then the SEA should address how such policies will be developed.

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 reviewers noted that the SEA described the kinds of information and support that homeless youth receive from school counselors, noting that all school counselors are expected to serve all students through a comprehensive school counseling program to include academic and career needs. Information on supplemental school counseling services for youth experiencing homelessness was also described. It was also observed that the plan was specific about training provided to assist counselors and higher education contacts in providing the needed support. The SEA provides resources and guidance to school counselors, in addition to training and education about educational rights or homeless youth.
<i>Strengths</i>	The peer reviewers identified strengths in the plan including that the SEA will offer professional development opportunities, resources, and technical assistance to liaisons and school counselors and will share the verification form for the FAFSA, as well as other training materials and resources, which liaisons will provide to counselors. Additionally, the SEA has developed a McKinney-Vento Higher Education Network, with Single Points of Contacts at all NC public colleges and universities, to support homeless youth in applying for higher education and financial aid, as well as to support academic success and college completion. Training and information for counselors and higher education contacts is provided through partnerships with State associations, resulting in outreach and professional development opportunities. In addition to the resources and training, monitoring examines the records of student support.
<i>Limitations</i>	Reviewers noted that although the SEA mentioned that school counselors are held to the NC Professional School Counselor Standards and evaluation rubric that are aligned with <u>the ASCA National Model: A Framework for School Counseling Programs</u> , a more detailed description of how counselors specifically work with homeless youth to prepare and improve their readiness for college would have strengthened this section. The plan should also give more detail about the training for counselors, including on how participation will be encouraged and if this will be verified during monitoring. The plan also did not indicate if data related to readiness for college or student access to financial aid are examined in the annual needs assessment.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3) Reviewers
<i>If no, describe the</i>	

<i>specific information or clarification that an SEA must provide to fully meet this requirement</i>	
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