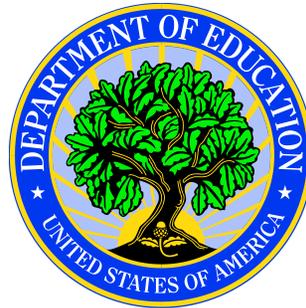


STATE PLAN

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

State Name: Nebraska



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 plan described review of LEA consolidated applications and onsite monitoring, and described procedures related to identification and statewide needs. The peer reviewers also noted that the State’s plan referred to procedures in place to identify homeless children and youth and to identify their needs.
<i>Strengths</i>	The reviewers noted that the State plan discussed the process to monitor the procedures and guidelines in effect in each district relative to McKinney-Vento, and described a variety of training opportunities for district liaisons and other school or district personnel, and described SEA monitoring and referenced review of the Consolidated application for annual data review.
<i>Limitations</i>	Peer reviewers observed that the plan did not provide a description of how the SEA will assess the needs of homeless children and youth. It was also noted that the plan did not describe how data are reported and tracked, how training or sample identification and residence templates are provided to address identification and assessment of needs, and how the State determines reasonableness of counts.
<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 indicated that the plan could be strengthened by addressing how LEAs are supported in the identification of students experiencing homelessness and how these data are reported, tracked, and analyzed, including how the State uses these data to analyze reasonableness of identification rates and statewide needs.

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 a description of the existing plan at the SEA level was provided for the prompt resolution of disputes.
<i>Strengths</i>	Reviewers noted that the State’s plan referenced Rule 19, which describes the steps LEAs must take and describes support from the SEA to LEAs regarding accountability and monitoring, using the ESEA Monitoring Guide Checklist to ensure local policy is being implemented consistently in the dispute resolution process.
<i>Limitations</i>	Reviewers observed that the plan did not provide a detailed description of the dispute resolution process, including the role of the SEA, and clarity on what can be disputed and whether eligibility has been added as a disputable issue.
<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 indicated that the State’s response to this requirement could be strengthened by including details regarding what can be disputed, the steps and timelines for the process, and the State’s role in resolving disputes. It was also suggested that the plan describe how disputes are tracked and reviewed at the State 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>	Reviewers noted that while there are various training opportunities provided for staff, the plan did not describe how the SEA will ensure that all liaisons receive training or provide specifics about the types of information included in the training. It was also noted that most of the additional audiences mentioned in the requirement are addressed (the plan mentioned local, State Title I staff, and preschool staff).
<i>Strengths</i>	Reviewers identified strengths in the State’s plan to provide training to other State-level program staff, including Title I and early childhood staff. Reviewers also noted that each liaison receives basic McKinney-Vento training and that several options for training may be offered such as Title I workshops and individualized technical assistance.
<i>Limitations</i>	Reviewers indicated that the plan did not mention runaway youth and did not specifically say how the State will provide support to ensure local awareness training occurs, and that the plan needed more information regarding how all audiences listed in the requirement will be reached.
<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>	Reviewers stated that the plan would be strengthened by including a description of how the State will monitor liaison training and how liaisons will be supported in providing training to all staff included in the 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 while some of the discussion in the plan is related to the requirement, the State plan did not describe how access is ensured, but it was noted that the plan included SEA procedures to ensure LEAs are assisting students in accessing preschool programs.
<i>Strengths</i>	Peer reviewers identified strengths in the State’s plan to utilize the ESEA Consolidated application and the ESEA Monitoring Guide to ensure compliance and address the removal of barriers. It was also noted that the plan included several references to early childhood programs, described the provision of technical assistance provided to State-level early childhood program staff, and that the SEA Homeless Liaison is a member of the Interagency Coordinating Council.
<i>Limitations</i>	Reviewers indicated that the State’s plan did not provide a clear description of the process to ensure homeless student access to public preschool programs.
<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 improved with additional description regarding homeless student access to public preschool programs, including prioritization in enrollment practices and school of origin transportation. Reviewers also recommended that baseline access data be collected and tracked to demonstrate progress or signal problems that could be addressed at the State level.

- **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 reviewers observed that while the State’s plan mentioned monitoring to ensure equal access, it did not describe information regarding access to secondary education or credit accrual in the response.
<i>Strengths</i>	Peer reviewers identified strengths in the plan’s reference to the assurances in the Consolidated application and in the SEAs monitoring of equitable access, and that the plan described a process for collaboration at the SEA level.
<i>Limitations</i>	Reviewers noted that the plan did not mention credit accrual, and it was unclear to reviewers how appropriate credit is awarded. Reviewers also indicated that the response did not address out of school youth, and that while the requirement addresses secondary education, it was not reflected in the State’s response.
<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 reviewers indicated that the SEA could strengthen the plan by providing clarification regarding how the requirements are being addressed (credit accrual, removing barriers, and monitoring). In addition, reviewers recommended that baseline data on access be collected and tracked to demonstrate progress or signal concerns that could be addressed at the State level.

- **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 reviewers observed that the State’s plan did not fully address the specific information requested in the requirement but provided a general statement of assurances and monitoring.
<i>Strengths</i>	Reviewers noted that the State’s plan indicated that equitable access is monitored and enforced by the SEA, and that an assurance is provided in the ESEA Consolidated application.
<i>Limitations</i>	Reviewers indicated that with the exception of monitoring, the plan did not describe or reference the activities and programs listed 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>	In order to strengthen the plan, the reviewers indicated that the plan needs to include a discussion of procedures that address access to programs listed in the requirement.

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 reviewers observed that the language of the plan did not reference the specific elements listed in the requirement impacting enrollment.
<i>Strengths</i>	Reviewers identified strengths in the plan including that the SEA uses available resources from the National Center for Homeless Education and the National Association for the Education of Homeless Children and Youth to support training and support for local liaisons.
<i>Limitations</i>	Reviewers noted that the plan did not provide strategies to address each enrollment delay listed 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>	The reviewers indicated the plan would be strengthened by providing implementation and compliance strategies regarding enrollment delays and how they are communicated to liaisons by the SEA, including data to document baseline and progress in removing these barriers.

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>	Reviewers observed that the State’s plan referenced LEA monitoring and assurances, but the response did not describe policies or mention the barriers listed in the requirement. Reviewers also stated that the plan did not demonstrate policy review at the State level or local level.
<i>Strengths</i>	The reviewers noted that the plan mentioned enrollment and retention, and included a focus on holding LEAs accountable for consistent implementation of established policies through ongoing technical assistance and communication from the SEA.
<i>Limitations</i>	The reviewers observed that the plan did not describe policies or mention the barriers itemized 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>	The reviewers indicated that the plan would be strengthened by providing examples of efforts and strategies that address specific barriers listed in the requirement and a process for State and local review of policies. Reviewers also noted that the State should describe its process to review and revise policies related to the barriers in the requirement; including what data are analyzed, how progress is tracked, and address how LEAs are supported and monitored specific to the issues in the 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 referenced current SEA requirements for counselors to advise all youth, but that additional details regarding how youth experiencing homelessness will be advised are needed.
<i>Strengths</i>	The reviewers identified strengths in the plan including the State’s regulations requiring counselors to address the needs and college readiness of all students.
<i>Limitations</i>	Reviewers noted that the plan is missing details on specific services (such as assistance in regards to FAFSA applications) provided to students experiencing homelessness and how students will receive these services.
<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 should address specific ways the State and localities will work with counselors to support students experiencing homeless to prepare for college and how progress on this process will be monitored.