

STATE PLAN

Peer Review Consolidated Notes

for the McKinney-Vento EHCY Program

State Name: Nevada



U.S. Department of Education
Spring 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 outlined policies and procedures currently in place to ensure the identification of homeless children and youth. These policies and procedures were observed across various programs, as well as the utilization of the U.S. Department of Education’s (ED) National Center for Homeless Education Technical Assistance Center (NCHE) resources, best practices, and strategies for meeting the needs of students. However, peer reviewers also observed that while the plan described what LEAs did to meet the needs of homeless students by carrying out the responsibility of identifying homeless students and their individual needs, it did not provide details about what the SEA would do to follow-up, monitor or support LEAs other than professional development in the identification of homeless students.
<i>Strengths</i>	The peer reviewers observed the following strengths in the State plan: Nevada’s revised statutes, technical assistance, and professional development that supported the overall identification of students who are experiencing homelessness, site visits to various locations where students are likely to be living to find homeless students, appointing a local liaison in each LEA, displaying posters with district liaison and State Coordinator contact information on them, and making local entities and school officials aware of identification responsibilities in working together for the identification of children and youth experiencing homelessness.
<i>Limitations</i>	The peer reviewers noted potential concerns with the wide variety of partners and policies for both the SEA and the LEAs, as well as time constraints and capacity, and that annual data elements collected for each LEA could support this requirement.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3) Reviewers <input type="checkbox"/> No
<i>If no, describe the specific information or</i>	

<i>clarification that an SEA must provide to fully meet this requirement</i>	
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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’s narrative described what role the SEA had in the procedures used for the prompt resolution of disputes regarding the educational placement of homeless children and youth. The narrative specifically stated the expectation “that the student is immediately enrolled.” Comprehensive steps were outlined in the State plan on the process the LEA and SEA used in the dispute resolution process. The steps described in detail the requirements of the LEA, communication with the parent, guardian or unaccompanied youth on their rights and process for filing a dispute, and the steps taken in filing with the office of the coordinator if parents or unaccompanied youth involved were not in agreement with the LEAs decision. But it did not describe the efforts to address transportation issues that may arise during the dispute process.
<i>Strengths</i>	The peer reviewers observed that the State plan described the process for disputes in clear terms. Specifically, reviewers saw that the State plan’s narrative provided a clear and precise picture of the roles both the SEA and LEAs have in the dispute resolution, including immediate enrollment and documentation.
<i>Limitations</i>	The peer reviewers noted that the State plan’s narrative for this requirement did not address issues related to transportation, and that the McKinney-Vento Act’s transportation requirements apply while disputes are being resolved. The peer reviewers also noted that timelines were not provided for the prompt resolution of disputes.
<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</i>	The peer reviewers indicated that the State plan would be strengthened if the response to this requirement addressed homeless student rights to transportation during the dispute process (if needed) to their school

<i>clarification that an SEA must provide to fully meet this requirement</i>	of origin, and if a timeline was provided outlining the prompt resolution of the homeless.
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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>	<p>The peer reviewers observed that the State’s narrative outlined opportunities for raising awareness of the specific needs of homeless children and youth. These opportunities were provided through various means and included the Title I Director’s meeting, the annual local liaison conference, and the NAEHCY conference. These opportunities included a diverse spectrum of educators and staff that may not otherwise be included in the liaison meetings and other technical assistance gatherings that happen annually. The opportunities, in combination with the various local meetings, technical assistance, and trainings offered by the State Coordinator provided, were observed as resources for the homeless liaisons to meet this State plan requirement. Peer reviewers observed the State plan indicated that the educational rights were distributed to families and youth via posters, monitoring and State level professional development were conducted.</p>
<i>Strengths</i>	<p>The peer reviewers observed in the State plan that the SEA had various means to provide training and professional development to LEA staff members at several levels and in several forms, and indicated the value of including Title I personnel regarding the training as often Title I schools hold a larger number of homeless students. The peer reviewers observed the State plan provided activities conducted by the State for support school personnel that increased awareness about homeless students and helped participants understand the requirements under the McKinney-Vento Act. The peer reviewers observed that the State plan provided a multitude of tools and strategies that can be easily offered to a liaison, school administrators, teachers, and others to learn from or even use for educating others while ensuring</p>

	identification of homeless students was conducted and that the needs of those students were routinely met in order to support their academic success in school.
<i>Limitations</i>	The peer reviewers noted that the State plan described various professional development opportunities but did not provide specific information about how the SEA addressed runaway homeless youth in the trainings or adequate information about this group of students in the State plan. Peer reviewers also noted that meeting the needs of runaway youth could be included in the various options of professional development that will be offered by the State Coordinators office, but that it was not explicitly stated.
<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 would be strengthened if it would more clearly indicate whether or not the current training addresses runaway youth, and if not, how they intend to address youth who are runaway and homeless. Peer reviewers noted that the State’s response to this State plan requirement can also be improved to describe programs for other school personnel, and to include additional groups of educators be trained in the identification of homeless students, are ensuring they are provided services afforded under the law.

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 a commitment to public preschool programs for Nevada’s homeless preschool population, but it was not clear what the procedure would be if the State ran out of spaces in their preschool programs for homeless students. The peer reviewers also observed that the State Coordinator would collaborate with the Office of Early Learning in developing training materials and resources for programs to access when identifying and working with homeless children and youth.
<i>Strengths</i>	Peer reviewers saw strengths in the State plan in referencing Nevada’s Administrative Code 392.205 that emphasized the priority of needs for possible homeless preschool students for the State’s early childhood funding, the collaboration between the State’s EHCY program and the Director of Early Childhood, and after school tutoring. Peer reviewers also observed as strengths: the description of immediate enrollment,

	free lunch offerings, and the provision of school supplies to homeless students once identified.
<i>Limitations</i>	Peer reviewers noted that the State plan indicated there were capacity issues concerning spaces in preschool programs, but did not find a strategic plan for working to remove such barriers. Reviewers observed that there should be some basic procedures to address capacity and support homeless preschool children. Peer reviewers observed that while that the State plan reflected the development of local tools, forms, and training documents with local programs, the resources from the NCHE, could be referenced when developing them.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3) Reviewers <input type="checkbox"/> No
<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 State plan was observed to both meet and not meet the requirement. The peer reviewers observed that school personnel and others working with homeless youth will be trained in understanding the rights of students to be enrolled, receive credit for work already completed or partially completed from another school or LEA, and that support services and academic needs will be met at the local level. The peer reviewers also observed that the State’s response to this requirement was too general and did not include the level of detail required to respond fully to the requirement.
<i>Strengths</i>	The peer reviewers observed that the State plan described systems in place for identification, meeting nutrition requirements, and training school officials on the McKinney-Vento Act, as well as how to work with those students and their families experiencing homelessness when they enroll in the LEA.

<i>Limitations</i>	The peer reviewers observed the State plan indicated its EHCY State Coordinator will work with school districts and possibly lawmakers to assist in establishing policies and procedures to provide appropriate credit for partial coursework satisfactorily completed while attending a school, in accordance with state, local, and school policies. The peer reviewers noted that it was not clear if there were current policies or procedures ensuring this requirement was being addressed and suggested additional language on credit accrual for full or partial work to fully meet the 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>	The peer reviewers indicated that the State plan would be strengthened if it included procedures to help ensure homeless youth and those youth separated from public schools are accorded equal access to secondary education and support services, by removing barriers which may 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. Such procedures could address course credit deficiency, and inter-district graduation requirement discrepancies.

- **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 after school tutoring services are available to students who are experiencing homelessness in each LEA, the State plan narrative for this requirement did not fully address the barriers listed in this clause when it described procedures used to remove access barriers for homeless students, such as services that include online learning, magnet schools, career and technical education, charter schools, and advance placement, if such programs are available at the State and local levels.
<i>Strengths</i>	The peer reviewers saw the State plan described procedures and systems that could address some of the need to ensure homeless children and youth have access to the academic and extracurricular activities listed in this clause, as well as transportation services for students accessing afterschool tutorial services

	along with the provision that meals or snacks are also accessible to those who qualify.
<i>Limitations</i>	The peer reviewers noted that the State plan narrative for this requirement did not address specific procedures to ensure access will occur for such services as online learning, magnet schools, career and technical education, charter schools, and advance placement, if such programs are available at the State and local levels.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes <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 State plan could strengthen its narrative if it addressed each of the items listed for this requirement. For example, the State plan describes that LEAs are required to waive fees for academic or extracurricular programs for students experiencing homelessness, but does not describe procedures to address the additional activities listed in this requirement, or additional issues that can create barriers for homeless children and youth who meet the relevant eligibility criteria. If the services are offered, the State plan could be strengthened by addressing how homeless students will access magnet school, summer school, career and technical education, advanced placement, online learning, and charter school programs.

I.5: Strategies to Address Other Problems (722(g)(1)(H) of the McKinney-Vento Act)

- **Does the SEA provide strategies to address other problems with respect to the education of homeless children and youth, including problems resulting from enrollment delays that are caused by—(i) requirements of immunization and other required health records; (ii) residency requirements; (iii) lack of birth certificates, school records, or other documentation; (iv) guardianship issues; or (v) uniform or dress code requirements?**

	<i>Peer Response</i>
<i>Peer Analysis</i>	The peer reviewers observed that the State plan provided strategies to address this requirement, but the strategies did not address all of the problems with respect to the education of homeless children and youth, including problems resulting from enrollment delays that are caused by the items listed, and was not specific in outlining actions to curtail, resolve, or remove problems resulting from enrollment delays.

<i>Strengths</i>	The peer reviewers observed that the State plan has several procedures and policies that can help address the items listed.
<i>Limitations</i>	The peer reviewers noted that while the State plan narrative did address some strategies to address other problems with respect to the education of homeless children and youth, including problems resulting from enrollment delays, the State plan did not fully address this requirement or provide specific strategies to address each of the five issues listed in the requirement, such as guardianship issues and uniform or dress codes. For example, the State plan described the procedure for district homeless liaisons meeting with site advocates and classroom teachers to review the academic needs of homeless children and youth and determine their needs. However, peer reviewers noted that the review of laws, regulations and practices at the State and LEA level would support the development of strategies to address this requirement, as well as the annual review of technical assistance logs, and annual monitoring data annually to identify areas of needs or concern.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes <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 State plan could be strengthened with more detail about the State's strategies to address each of the five items listed in this requirement and explain what procedures and policies will be established or augmented.

The SEA's plan addresses the following problems encountered by homeless children and youths that disrupt their education resulting from enrollment delays:

- immunization and other health record requirements
- residency requirements
- lack of birth certificates, school records, or other documentation
- guardianship issues
- uniform or dress code requirements

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 reviewers observed that the State plan includes several procedures and policies that can address this requirement, but did not clearly demonstrate that the SEA and LEAs in the State have developed, and review and revise, policies to remove barriers to homeless student enrollment and retention.
<i>Strengths</i>	The peer reviewers saw that the State plan has several procedures and policies that can address the barriers listed in the requirement, such as professional development and systems in place to address fees associated with academic or extracurricular programs. The peer reviewers also saw that the State plan addressed training for homeless liaisons and other school officials on identification and barriers that homeless children and youth may face in being enrolled and staying in their school or origin.
<i>Limitations</i>	The peer reviewers noted that the State plan narrative did not fully describe current or planned policies regarding the barriers to retention due to absences of homeless students. The SEA should have expanded its narrative on these two components of this element to provide a clear description of the policies it either has in place or will develop for these items. The peer reviewers noted that it was not clear how policies and procedures are developed, reviewed, or revised.
<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 peer reviewers indicated the State plan could be strengthened by clearly demonstrating that the SEA and LEAs in the State have developed, and review and revise, policies to remove barriers to homeless student enrollment and retention, by fully addressing policies to address barriers to the retention of homeless students due to absences, and by describing how the current system of policies and procedures will be reviewed and revised. In addition, the peer reviewers indicated the plan could be strengthened by including as resources the program non-regulatory guidance by ED, and NCHE briefs and resources.

The SEA’s plan includes the following policies to demonstrate that the SEA and LEAs in the State have developed, and shall review and revise, policies to remove barriers to the identification, enrollment and retention of homeless children and youth:

- identification of homeless children and youth
- enrollment of homeless children and youth
- retention of homeless children and youth
- outstanding fees or fines
- 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 State plan described the State Coordinator’s role in providing consistent training and technical assistance to homeless liaisons as well as school personnel specifically on the rights of homeless children and youth including improved readiness for college. The peer reviewers also observed that while the State plan provided a resource (the NAEHCY Higher Education Helpline) to address assistance from counselors, it was limited in its description of how the SEA will assist LEAs in meeting the needs of homeless youth as they prepare and make themselves ready for college other than using the helpline.
<i>Strengths</i>	The peer reviewers observed that the State plan recommended NAEHCY Higher Education Helpline as the resource for students preparing for college to access, parents, high school counselors, and financial aid advisor. The peer reviewers also observed that the State plan included information on several professional development opportunities that could be used to train local liaisons and LEA counselors on this topic.
<i>Limitations</i>	The peer reviewers noted that the State plan narrative for this requirement provided NAEHCY’s Higher Education Helpline as the resource for homeless students, but did not provide a description of how the SEA and the State’s Homeless Coordinator would assist LEAs to provide counseling assistance to homeless students to advise, prepare, and improve their readiness for college, or the role the LEA counselors have in providing support to homeless students.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (3) Reviewers
<i>If no, describe the</i>	The peer reviewers indicated that the State plan could be strengthened by including how homeless youths

<i>specific information or clarification that an SEA must provide to fully meet this requirement</i>	will receive assistance from LEA counselors to advise, prepare, and improve their readiness for college. The peer reviewers also indicated additional persons or groups to support the counseling needs for homeless youth as they prepare for college, such as social workers and community.
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