

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

State Name: Ohio



U.S. Department of Education
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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 how it will disseminate information regarding the identification of homeless students, guidance documents, best practices, and the designation of local liaisons, and included a procedure to identify homeless children and youth and assess their needs. However, the description was limited (it was described for local level and not State level). Additional information regarding the specifics of this procedure, such as monitoring and further information on needs assessment would strengthen the application.
<i>Strengths</i>	The peer reviewers identified as strengths that the plan described its role in training and guidance for local liaisons with the State Coordinator providing training on strategies and procedures for LEA identification, and collaborating with other State and local organizations to ensure awareness and identification. Also noted was that the plan addressed several different strategies in successful identification of homeless children and youth such as the designation of local liaisons, a State Coordinator, technical assistance, collaboration activities, and professional development. Collaboration was also mentioned in several other parts of the plan by Title I, Part C, English Learners, and 21 st Century to support the identification of homeless children and youth.
<i>Limitations</i>	It was observed that the State’s plan did not describe procedures for identifying students or how it will assess their needs. The plan stated how liaisons will assess needs but assessing needs was not specifically noted for training. Reviewers also noted that the plan did not describe State-level needs assessment, how data are collected or tracked, or how students are identified. The plan also did not describe how data are used to determine the reasonableness of the identification done at the local and State level.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> No (3) Reviewers
<i>If no, describe the specific information</i>	The peer reviewers indicated that the State plan should outline the systematic way in which it expects students to be identified and how those numbers will then be reported back to the SEA. It could be

<p><i>or clarification that an SEA must provide to fully meet this requirement</i></p>	<p>strengthened by describing needs assessment procedures (the CCIP referenced on page 101 may be included to meet this requirement), data collection and tracking, LEAs monitoring to ensure appropriate procedures are in place, and State use of data to determine reasonableness of identification efforts. The plan would be further strengthened by a more robust explanation of the frequency and intensity of professional learning to provide a fuller understanding of the fidelity of implementation for identification.</p>
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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 description was general, and provided limited information about actual procedures. It did not include timelines, protocols, procedures or instruction on how that process should move forward. Professional development is provided but the plan did not describe how prompt resolution will occur. While the plan did include some of the components for prompt resolution of disputes, such as the levels a dispute will follow, it would be improved by including more specific information on the State's definition of prompt resolution and the rights of homeless children and youth during a dispute.
<i>Strengths</i>	The peer reviewers noted strengths including that the plan outlined a process that encourages local dispute resolution and a hierarchy which allows for an appeal to the State Coordinator and ultimately the State superintendent, and that the State Coordinator provides professional development on State developed procedures. Reviewers also noted that the plan description states that appeals must be responded to promptly and references the student's right to remain in school while disputes are resolved.
<i>Limitations</i>	It was noted that the State's plan lacked specificity and timelines, did not identify what can be appealed, or the necessary processes by which a dispute can rise from an LEA to the SEA. It did not describe any monitoring of LEAs on the use of the dispute process or tracking of State appeals. Also, the plan was limited in its description of a student's right to immediate enrollment, pending all available appeals, and that the student should attend the school of preference (either the local school or the school of origin) during a dispute.
<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</i>	The peer reviewers indicated that the State plan would be strengthened by including a description of the State-level procedure (with timelines describing the point at which an LEA matter should be moved to the SEA level), proper communication methods, protocols, what can be disputed, and how LEAs are monitored for compliance. It also should include language regarding immediate enrollment and a statement regarding where the student is to be enrolled during a dispute. It would also be helpful to

requirement

provide a copy of the procedures.

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 professional development using a variety of strategies, with a description of programs for school personnel to heighten awareness.
<i>Strengths</i>	The peer reviewers noted strengths including a robust description of training and outreach by the State Coordinator to various school personnel and collaborations across State programs to build awareness. The State plan included an extensive discussion surrounding the transportation outreach conducted by the SEA. Annual monitoring by the Office of Federal Programs, which includes professional development, assures that this requirement is met. Districts are encouraged to use professional development portals to ensure all staff are trained, and the State website is updated on a regular basis with awareness resources. Additionally, a new federal grant will support further analysis of youth needs.
<i>Limitations</i>	It was noted that the State’s plan did not specifically outline how it addresses the needs of runaway and homeless youths, though the new federal grant may assist with this component. The plan would be strengthened by specific information on how the SEA heightens awareness of the needs specific needs of homeless children and youth, including such children and youth who are runaway and homeless youths. Reviewers also indicated that a more systematic approach to training might help ensure that staff understand their role in helping to ensure services for homeless students, as well as describing how monitoring addresses professional development and how the State tracks attendance.
<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 peer reviewers observed that the plan listed reasonable actions to support preschool access and demonstrates a high level of collaboration and technical assistance, but a more detailed explanation of how the SEA ensures that students have access to public preschool programs is needed.
<i>Strengths</i>	The peer reviewers noted strengths including several activities outlined which serve as a method for LEAs to provide access for homeless children to public preschool programs. Specifically, technical assistance, prioritization, transportation, and collaboration of the State Coordinator with State early childhood education programs.
<i>Limitations</i>	It was noted that greater detail describing the procedures listed would enhance this response. The plan is descriptive in the activities of the LEAs, but it did not specifically address how the SEA ensures that homeless children and youth have access to public preschool programs.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3) Reviewers
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	The peer reviewers observed that the plan outlined several activities and strategies surrounding this requirement which serve to assist homeless youth with credit accrual. While these are important and strategies, the plan did not address how the SEA ensures appropriate credit. Reviewers also found that the plan stated that removal of barriers is expected at the LEA level and that there are professional development and training opportunities to help liaisons with this expectation.
<i>Strengths</i>	The peer reviewers noted strengths in the plan, including evidence of activities which support the credit accrual process. Professional development and training is provided and the State encourages districts to implement procedures to increase access. The SEA encourages LEAs to develop supplemental opportunities for credit recovery.
<i>Limitations</i>	It was noted that while these activities are beneficial in assisting students in credit accrual, the plan did not describe how this is ensured by the SEA through such activities as monitoring. The plan also does not specify how transferring students would receive full credit when the two LEAs have different credit requirements.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3) Reviewers
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

- **Does the SEA describe procedures that ensure that homeless 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 the plan provided a description of how the SEA expects students experiencing homelessness will be afforded all academic and extracurricular activities when necessary and appropriate. The reviewers also observed that the State has policies and procedures in place, including monitoring to address this, but describing what data are used to track progress on access would strengthen this response.
<i>Strengths</i>	The peer reviewers noted strengths including that the plan clearly outlined the requirement that districts have policies and procedures in place, that these policies and procedures are reviewed annually by the LEA, and that there is a monitoring process to ensure they are followed. The monitoring specifically addresses the removal of barriers to accessing academic and extracurricular activities.
<i>Limitations</i>	It was noted that the SEA could strengthen this response by describing what data are used to track progress on access and discussing how it ensures access to these programs even if a student has missed application or enrollment deadlines during any period of homelessness.
<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.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 SEA outlined training and technical assistance as its primary procedure for combatting barriers to enrollment for homeless students. The plan offered a clear description of strategies, including the Comprehensive Continuous Improvement Plan.
<i>Strengths</i>	The peer reviewers noted strengths including a variety of strategies such as the use of other federal funds to support student needs including Title I set-asides. Reviewers also saw evidence of collaboration to ensure that these requirements are met and that LEAs are required to describe their strategies to address the needs of homeless students in their comprehensive plans.
<i>Limitations</i>	It was noted that the plan did not include a description of its strategies to address uniform or dress code requirements.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (2) Reviewers <input checked="" type="checkbox"/> No (1) 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 in order to meet this requirement, the plan would need to specifically address its strategies to address enrollment delays caused by 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 plan showed the SEA has a system in place with a reasonable list of policies and procedures to review and remove barriers.
<i>Strengths</i>	The peer reviewers noted strengths in the plan, such as the inclusion of State statutes, homeless student needs, and description of funding options to remove barriers. Also, the plan specifically addressed the development, review and revision of policies and describes a monitoring process which assists in ensuring these activities occur.
<i>Limitations</i>	Peer reviewers noted that greater detail regarding data on the listed barriers and more specific information surrounding the types of State statutes which support the removal of barriers would strengthen this section.
<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>	Peer reviewers indicated that more detailed information regarding the referenced statutory provisions would be helpful in ensuring that the procedures are specific to McKinney-Vento.

I.7: Assistance from Counselors (722(g)(1)(K))

- **Does the SEA include how youths described in section 725(2) will receive assistance from counselors to advise such youths and prepare and improve the readiness of such youths for college?**

	<i>Peer Response</i>
<i>Peer Analysis</i>	The peer reviewers observed that the SEA has expectations of what counselors are expected to do to support homeless students. The plan included a list of activities and resources that increase support from counselors, including ongoing technical assistance, resources, data analysis, and cross-program collaboration. Reviewers indicated that to strengthen the response to this requirement, the SEA should include a description of how compliance with this requirement will be monitored.
<i>Strengths</i>	The peer reviewers noted as a strength that the SEA provided a comprehensive response that includes technical assistance, access to tools, data analysis, collaboration with Title II and Title I, fee waivers, diversion, after-school programming and the requirement that districts will have a clear procedure to ensure homeless students receive appropriate credit for full or partial coursework. The plan addressed the need for waivers on ACT and SAT exams, using the Unaccompanied Youth toolkit, and liaisons working with family courts. Also noted was the expectation for counselors to work with homeless students in completing the FAFSA.
<i>Limitations</i>	The reviewers noted that it was unclear how counselors will be informed and how the State will track that all youth receive assistance; including this requirement in monitoring would strengthen this response.
<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>	