

STATE PLAN
Composite Notes Form
for the McKinney-Vento EHCY Program

State Name: Oklahoma



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 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 described a variety of procedures used to identify homeless students and that the plan included a description of how homeless student’s needs will be assessed.
<i>Strengths</i>	The peer reviewers identified strengths in the State plan’s collaboration with key stakeholders. The plan also described professional development that is provided to other school personnel on best practices for identification and addressed the under-identification of homeless students.
<i>Limitations</i>	It was noted that the State plan provided limited information as to how individual students are assessed, and that the State plan described procedures that are used to identify homeless students at the beginning of the year. It was also noted that the plan did not provided detail on identification throughout the academic year.
<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 observed that the State plan described procedures at the LEA and SEA levels to address disputes regarding the educational placement of homeless children and youth.
<i>Strengths</i>	The peer reviewers identified strengths in the State plan’s description of their timeline and the prescribed process for LEAs and the SEA was outlined. Reviewers also noted the State plan’s reference to the McKinney-Vento dispute procedure in the State administrative code.
<i>Limitations</i>	It was indicated that the State’s plan would be strengthened if details were provided regarding the role of the State Coordinator once a complaint reaches OSDE, and the process by which the OSDE homeless specialists ensure that local policy is reviewed regularly and revised as needed.
<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 State plan described efforts to increase awareness through professional development, training, collaborative resources, local strategies and technical assistance. It was also noted that the plan did not include requirements that such training and technical assistance is provided for key personnel.
<i>Strengths</i>	The peer reviewers identified strengths in the State plan’s collaboration with other agencies and organizations. Additional strengths included that the plan also addressed the State’s Native American population.
<i>Limitations</i>	It was noted that the State’s plan listed efforts to address this requirement, but that the plan did not provide specific program strategies.
<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 peer reviewers indicated that the plan would be strengthened by the SEA describing how LEAs are held accountable for the delivery of training and professional development to key personnel. The SEA must describe how new employees can access webinars, and describe how school personnel will receive annual training. The SEA must also include training for agencies working with runaway students and describe programs for school personnel to increase awareness.

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 described procedures and collaborative efforts to ensure that preschool aged children have access to public preschool programs. Reviewers also noted that it wasn't clear what OSDE currently has in place versus what it is planning to do in response to this requirement.
<i>Strengths</i>	Peer reviewers identified strengths in the State plan's description of specific strategies and collaborations with key agencies and partners and the effective use of data to inform program implementation. Another noted strength was that the SEA has statewide early childhood programs for all students and slots reserved for preschool homeless students who are given priority on waitlists. The State plan's description of trainings conducted for LEAs, the requirement of the liaison to maintain data pertaining to outreach, enrollment and retention through professional development and the provision of transportation for preschool programs were also noted as additional strengths by peer reviewers.
<i>Limitations</i>	It was noted that the State's plan would be improved with a clear description that differentiates what OSDE will do and what is currently in place at the SEA.
<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 State plan described strategies in effect to address equal access to support services for homeless youth.
<i>Strengths</i>	The peer reviewers identified strengths in the State plan such as the description of how the SEA will work with the LEA to identify tools to support credit recovery and the use of trainings through webinars and professional development on strategies to remove barriers. The plan described support for highly mobile students.
<i>Limitations</i>	Peer reviewers noted that the State’s plan did not describe a process to identify and remove credit accrual barriers or provide procedures such as the collaboration between the local liaison and the school counselor. It was also noted that the State’s plan did not explain school policies regarding its procedures on full or partial credit recovery classes.
<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 State plan described appropriate procedures and strategies to support the enrollment of homeless students in academic and extracurricular activities. It was also noted that the OSDE homeless program specialist provides technical assistance to LEAs but the plan did not provide detail on specific strategies that ensure compliance with the requirement.
<i>Strengths</i>	The peer reviewers identified strengths in the State plan's description of training and technical assistance provided to the local liaisons to ensure students are notified of their right to participate and for the support in place for local liaisons to review and revise policies that may act as barriers for students.
<i>Limitations</i>	Peer reviewers noted that the State's plan referred to programs but provided a limited description of the specific strategies that are being implemented at the LEA level. Peer reviewers also noted that the State's plan did not address how to address the barriers of transportation, uniforms or the cost associated with either for homeless students.
<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>	It was not clear to all peer reviewers that the State plan provided reference to all areas listed in the requirement. Reviewers also noted that the State plan included information regarding professional development that is conducted by the program specialist to the LEAs to ensure barriers to enrollments are removed.
<i>Strengths</i>	Peer reviewers identified strengths in the State plan’s explanation of how the SEA plans to provide training and monitoring to address other problem areas. Peer reviewers noted additional strengths in the State plan’s collaboration with the State Department of Health, and collaboration with community resources and Title I.
<i>Limitations</i>	It was noted that the State’s plan would be strengthened if the plan provided a detailed description of strategies and tools that are used to address specific problems relative to those listed in the requirement. Peer reviewers also observed that the plan did not provide details regarding specific training for school enrollment staff to help eliminate possible delays, and that including this would strengthen the plan.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3) Reviewers
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

I.6: Policies to Remove Barriers (722(g)(1)(I) of the McKinney-Vento Act)

- **Does the SEA demonstrate that the SEA and LEAs in the State have developed, and shall review and revise, policies to remove barriers to the identification of homeless children and youth, and the enrollment and retention of homeless children and youth in schools in the State, including barriers to enrollment and retention due to outstanding fees or fines, or absences?**

	<i>Peer Response</i>
<i>Peer Analysis</i>	The peer reviewers observed that the State plan did not provide detail relative to the specific barriers listed in the requirement. Peer reviewers also noted that the State plan laid the groundwork for the review and removal of barriers but that the plan did not include all elements of the requirement.
<i>Strengths</i>	The peer reviewers identified strengths in the State plan’s description of how the SEA monitors the removal of barriers and the semi-annual meeting that is held to review policies.
<i>Limitations</i>	It was noted that the State’s plan did not address outstanding fees, fines or absences and did not demonstrate that it has policies to address how all of the barriers listed will be removed.
<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 peer reviewers indicated that the State plan would be strengthened if the plan addressed outstanding fees or fines, or absences and how these barriers would be resolved and with what resources. The SEA must also provide detail as to how the liaison will work with the LEA to address fees and fines incurred by the homeless students. The plan should include the strategies that the liaison and counselor will explore to remove attendance barriers.

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 plan did not include sufficient detail regarding what assistance and/or services are actually provided by school counselors to homeless youth. It was also noted that the SEA provided a plan to support and ensure readiness of unaccompanied youth to access college and also noted the partnership between OSDE and State Higher Education for professional development to school counselors related to postsecondary education.
<i>Strengths</i>	Peer reviewers identified strengths in the State plan’s partnership with State Regents to disseminate appropriate information, and in the collaboration between the local liaison and the school counselor including informing students of their independent status for financial aid.
<i>Limitations</i>	Peer reviewers noted that the language of the plan did not provide details on what specific services or strategies are provided. It was also noted that the State’s plan encourages local liaisons to work with the school counselor but was not specific about how unaccompanied youth will receive assistance.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> No (3) Reviewers
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	Peer reviewers indicated that the State plan would be strengthened if the SEA provided detail regarding specific services provided by counselors to improve readiness for college and/or other post-secondary opportunities for homeless youth. The SEA must also provide detail as to how the SEA will ensure counselors obtain specific training for college readiness through professional development, provide detail as to how local liaisons and school counselors will work together, and how unaccompanied youth will receive assistance.