

STATE PLAN

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

State Name: Oregon



U.S. Department of Education
June 22, 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;
- Overall Determination: 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 review panel agreed that the SEA described procedures it will use to identify homeless children and youth in the State and to assess their needs including at a statewide level.
<i>Strengths</i>	The peer review panel observed that the SEA employs a multi-pronged approach to ensuring that LEAs are identifying students experiencing homelessness. The approach includes provision of model policies, data review, awareness activities for community and service providers, and monitoring. The plan clearly outlines the expectation that all districts have local board-adopted policies on which they are monitored. A sample has been provided by the Oregon School Boards Association (OSBA). Identification data is also part of the risk assessment, and there is evidence of collaboration with service providers. Training is provided on needs assessment to liaisons which is incorporated into the monitoring process. Subgrant applications include data-driven academic goals, and the SEA identifies next steps in strengthening interventions.
<i>Limitations</i>	The peer review panel noted that there was little mention of outreach activities to parents, guardians, or unaccompanied youth regarding the educational rights of children and youth experiencing homelessness and how the SEA assures this outreach. This may be in the form of providing posters, brochures or other outreach materials. While the SEA describes a state Early Warning and Intervention System, it would be helpful to have more clarity on how this system directly impacts the EHCY program.
<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>	

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 review panel agreed that the SEA described procedures for the resolution of disputes regarding the educational placement of homeless children and youth. Although specific details for prompt resolution were not indicated other than that prompt resolution, it was mentioned as a priority of the State Coordinator.
<i>Strengths</i>	The peer review panel observed that the State provides districts a sample dispute resolution process, which is approved by the OSBA and updated to reflect the reauthorization of the McKinney-Vento Act. This sample document is available for download on the ODE Homeless Education webpage. A sample school placement letter and McKinney-Vento Act eligibility form were also posted for district use. Prompt resolution of disputes is mentioned as a priority for the State Coordinator to assist in timely resolution.
<i>Limitations</i>	Since the State does not require a uniform dispute process, the peer review panel observed that it was unclear how the SEA ensures that districts are in compliance with this provision and have in place either the suggested dispute procedures, as provided by the ODE, or have created their own complaint procedures in accordance with the reauthorization of the McKinney-Vento Act. Also, the method or process of advancing appeals from the local level to the State level and timelines for these stops were not clear from the description nor was the information referenced on their website.
<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>	Based on the peer review, one reviewer recommended that the SEA include more specific information about the steps and timeframes for LEA disputes and SEA appeals in its description of procedures for the prompt resolution of disputes.

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 review panel agreed that the SEA described various programs or ways it would provide support for school personnel to heighten their awareness of the specific needs of homeless children and youth, including unaccompanied homeless youth.
<i>Strengths</i>	The peer review panel observed that the State had multiple measures and modalities in place to ensure that various staff are trained on McKinney-Vento to assist in building capacity on the specific needs of homeless children and youth with outreach across the state and throughout various agencies. The collaboration with other departments and agencies, such as the Oregon Child Care Division and the Oregon Pupil Transportation Association, has created opportunity for awareness for staff who are generally more difficult to reach at the local level. The plan also addresses trauma-informed practices and affirms the State’s dedication to supporting mental health. Training for school personnel is offered in-person and through online means such as webinars. The SEA has a listserv through which it provides semi-monthly updates on the McKinney-Vento program, including training opportunities. LEA liaisons are required to include all staff, including transportation and attendance staff in awareness training. The LEA is producing additional training videos entitled, “Oregon Liaisons at Work.”
<i>Limitations</i>	The peer review panel noted that the training cycle for school personnel was unclear. It would be helpful to know if training occurs annually, on an ongoing basis, or some other timeline. The SEA also did not describe how training is evaluated for effectiveness.
<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>	

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 review panel agreed that the SEA described several procedures that ensure that homeless children have access to public preschool programs by providing evidence of collaboration, access and support for transportation to school of origin.
<i>Strengths</i>	The peer review panel noted that data sharing between local Head Start programs and liaisons assisted in stronger data validity on the number of homeless children enrolled in these programs. Additionally, the plan references the requirement for school of origin transportation for LEA-administered preschools or Head Start programs. The collaboration at the State between the ODE McKinney-Vento and Head Start appears to be very strong which provides a solid framework for access for McKinney-Vento students. The Head Start programs share data with LEA Liaisons, allowing inclusion of those students in SEA program evaluation.
<i>Limitations</i>	The peer review panel observed that the SEA did not provide its own specific procedures to ensure access to preschool. While the SEA does show a strong commitment to collaboration with Head Start, it is unclear how the State assures LEAs provide access to public preschool programs. The panel observed it might be helpful to provide a brief description of the SEA’s expectations of the LEA regarding this provision as support of the requirement that the SEA ensures access. Additionally, it would have been helpful to include a discussion on the State’s requirement that documentation not present a barrier to enrollment for homeless children to public preschool which assists in providing them equal access as provided to other children in the State.
<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 peer review panel agreed that the SEA plan indicates there is a support system in place to assist with this requirement.
<i>Strengths</i>	The peer review panel observed that the plan includes the inclusion of collaboration with other highly-mobile populations. The SEA supports credit recovery programs and implements a Portable Assisted Study Sequence (P.A.S.S.).
<i>Limitations</i>	The peer review panel noted that this section of the plan could be strengthened by providing specific information around the current supports in place or the State’s future plans for implementation. For example, further description of the types of supports currently in place to assist LEAs in awarding full or partial credit appropriately would be helpful. Additionally, it would be useful to know if the State has uniform graduation requirements and tracks this barrier, and the framework in place to assist mobile students as they transfer between districts. Furthermore, this portion of the plan does not make reference to any technical assistance that might be provided to school counselors on awarding partial credit or coordination to assure they are aware of this specific provision of the reauthorized McKinney-Vento Act. Finally, it is unclear in this section’s narrative how the SEA supports homeless youth who are separated from public schools although the narrative for I.1 implies that these youth are identified and reengaged in school.
<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 SEA could describe specific procedures for full or partial credit transfer that may include training and technical assistance. These procedures could also be tied to efforts to improve graduation rates for transferring or enrolled students experiencing homelessness.

- **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 review panel agreed that the SEA described procedures, including specific collaborations and policies that meet this requirement.
<i>Strengths</i>	The peer review panel observed that the plan references a comprehensive list of programs with which local liaisons collaborate, including those referenced in the requirement. The State is also in the process of developing guidance on the unique needs of homeless students in alternate learning environments, such as online schools and virtual academies. This effort will help address the changing landscape of educational options for McKinney-Vento students, thereby, assisting them in gaining access to these programs. It also references collaborations with before and after-school programming, the Oregon Student Activities Association, and state GED administrators as means to remove barriers to participation. Furthermore, LEAs complete an assurance that each homeless student will receive comparable services to other students and liaison trainings include information on inclusion of homeless students. Finally, the SEA collaborates with the 21 st Century Community Learning Center Programs to extend extracurricular activities to homeless youth.
<i>Limitations</i>	The peer review panel noted that it would be helpful to include a statement on the State’s monitoring or follow-up regarding districts’ implementation of these requirements as evidence they assure this is occurring on the local level. Guidance on inclusion of homeless youth in online schools is still in development but good to have underway.
<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>	

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 review panel agreed that the SEA addressed each of the elements of this requirement. The State of Oregon has enacted a number of state statutes similar to those in the McKinney-Vento Act statute related to guaranteeing families and youth experiencing homelessness immediate enrollment in school.
<i>Strengths</i>	The peer review panel observed that the State has implemented several provisions in statutes supporting the removal of these barriers including grace periods for immunizations, waiver of residency requirements, sample policies for documentation, the implementation of a caregiver form, plus statute and procedures for assuring uniform or dress code requirements are met. There is clear statewide support for the removal of these barriers. For example, the State Health Division allows a 30-day grace period for homeless students and families to provide health records and documentation. This allows LEA Liaisons time to assist in gathering the required documents. In addition, the SEA provides guidance on using the Title I, Part A set-aside to support the needs of homeless children and youth.
<i>Limitations</i>	While there appears to be a strong State statute regarding the removal of each of these barriers, the peer review panel noted that it was unclear how the State assures adherence at the local level. It would help to clarify this section to include the procedures the State utilizes in monitoring these provisions.
<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>	

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 review panel agreed that the SEA did not demonstrate that it met this requirement because there was no specific mention of policies concerning absences.
<i>Strengths</i>	The SEA provides a model McKinney-Vento Act sample LEA policy that ensures no barriers are created. The enrollment element of this requirement was met through the inclusion of the dispute process which specifically outlines the provisions of the reauthorized McKinney-Vento Act. Fees and fines have been addressed both through State statute and the review and revision of policies at the local level. Other portions of the plan point to comprehensive efforts to identify students experiencing homelessness, although this is not spelled out specifically in this section. Trauma-informed practices and accommodations for homeless students regarding discipline are promoted throughout the state which could point to practices which support retention.
<i>Limitations</i>	The peer review panel observed that the one required area not addressed by the SEA for this item was absences. It would be beneficial for the State to describe procedures in place to remove barriers related to absences such as transportation requirements by the State, the monitoring process for LEA supports for absences (and the other barriers mentioned in this item), data review at the State level on the truancy or absence rates, or other State procedures for absences related to homelessness. Additionally, it would be beneficial to address in more detail the types of professional learning which supports the removal of these barriers. Finally, the process that the SEA uses to review State-level policies was not clear.
<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 SEA should describe specific policies that it has developed, reviewed and/or revised concerning absences as a barrier to enrollment and retention of homeless children and youth. It may also describe processes for gathering the information it could use to inform policy revisions or new policies as well as the effectiveness of implementation of current policies.

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 review panel agreed that the State plan provides a brief description of how youths will receive assistance to prepare and improve their readiness for college that demonstrates the SEA’s awareness of this new requirement.
<i>Strengths</i>	The peer review panel observed that the SEA provides ongoing training through workshops and conferences for counselors to assist them in carrying out their responsibilities to provide career and college preparation guidance, including working with unaccompanied homeless youth to complete the FAFSA.
<i>Limitations</i>	The peer review panel noted that if the State has in place a system or process that LEAs utilize in graduation planning and post-secondary transition, it would be helpful to include this information. Additionally, while the section mentions expectations that school counselors and liaisons provide assistance, it does not describe how this is ensured by the State. An explanation of the expectation for implementation at the local level by the State would provide a fuller understanding of how it meets this requirement. Also, the training plan could be strengthened by including a timeline.
<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>	