

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

State Name: Puerto Rico



U.S. Department of Education
September 2017

Background

Peer reviewers will apply their professional judgment and experiences when responding to the questions in response to the criteria below. Consistent with section 1111(a)(4)(C) of the Elementary and Secondary Education Act, peer reviewers will conduct an objective review of State plans in their totality and out of respect for State and local judgments, with the goal of supporting State- and local-led innovation and providing objective feedback on the technical, educational, and overall quality of a State plan, including the validity and reliability of each element of the plan. Reviewer responses to the questions inform the written determination of the Secretary regarding the State plan.

Role of the Peer Reviewers

- Each peer reviewer will independently review a consolidated State plan in accordance to the criteria for Title VII, Subtitle B of the McKinney-Vento Homeless Assistance Act's Education for Homeless Children and Youth Program (EHCY). Each reviewer will record their responses to the questions, will note where changes may be necessary for an SEA to fully address statutory and regulatory requirements, and may also present suggestions for improving the plan or to highlight best practices. Each peer will create individual recommendations to guide the remote review. These are submitted to the Department but will not be shared with the State.
- A panel of peer reviewers will meet remotely to discuss each SEA's plan. The panel of peer reviewers will generate one set of peer review notes that reflects their collective review and evaluation of the SEA's State plan, but the panel is not required to reach consensus. The notes should reflect all reviewer perspectives on each item.

After the peer review is completed, each SEA will receive the final peer review notes that include the peer reviewers' responses to the questions and any recommendations to improve the SEA's State plan in the sections that the peers reviewed. The peer review notes serve two purposes: 1) they constitute the official record of the peer review panel's responses to questions regarding how an SEA's State plan addresses the statutory and regulatory requirements; and 2) they provide technical assistance to the SEA on how to improve its plan. The peer review notes also serve as recommendations to the Secretary to determine what, if any, additional information to request from the SEA. Taking into consideration the peer reviewers' recommendations, the Department will provide feedback to each SEA that outlines the areas the SEA must address, if any, prior to the Secretary's approving its State plan. If a plan cannot be approved, the Department will offer the State an opportunity to revise and resubmit its plan and have a hearing, consistent with ESEA section 8451.

Consistent with ESEA section 1111(a)(5), the Department will make publicly available all peer review guidance, training, and final peer panel notes. The names of peer reviewers will be made publicly available at the completion of the review of all State Plans, though the peer reviewers for any individual State will not be made available.

How to Use This Document

The reviewer criteria is intended to 1) support States as they develop their consolidated State plans, and 2) inform peer review teams as they evaluate each State plan. This document outlines required elements in order for an SEA to fully address the applicable statutory and regulatory requirements. If an SEA has provided insufficient information for peer reviewers to determine whether any question is fully addressed, peer

reviewers should indicate that the SEA has not fully addressed that requirement and identify what additional information or clarification may be needed.

Instructions

Each peer reviewer should include individual review notes in the space provided below each State plan requirement. For each State plan requirement, a peer reviewer will provide:

- Peer Analysis: Describe the peer reviewer's justification for why an SEA did or did not meet the requirements;
- Strengths: Summarize strengths of the SEA's response to the State plan requirement;
- Limitations: Summarize the limitations of an SEA's response to the State plan requirement, including issues, lack of clarity, and possible technical assistance suggestions;
- Assessment: Determine if the SEA met the State plan requirement (indicated by Yes/No); and
 - If the peer reviewer indicates 'no' above, the peer must describe the specific information or clarification that a State must provide in order to meet the requirement.

The peer reviewer notes should address all of the required elements of each State plan requirement in this document, but do not need to address each element individually (*i.e.*, the peer notes should holistically look at I.5 the Strategies to Address Other Problems, incorporating each of the five identified items in this element but do not need to individually respond to each item).

SECTION I: EDUCATION FOR HOMELESS CHILDREN AND YOUTH PROGRAM, MCKINNEY-VENTO HOMELESS ASSISTANCE ACT, TITLE VII, SUBTITLE B

I.1: Student Identification (722(g)(1)(B) of the McKinney-Vento Act)

- **Does the SEA describe the procedures it will use to identify homeless children and youth in the State and to assess their needs?**

	<i>Peer Response</i>
<i>Peer Analysis</i>	The peer reviewers observed that the State plan provided details regarding annual trainings to school district staff to ensure understanding of eligibility, student’s rights, to raise awareness and to promote consistency in the identification process. The SEA provides official communication to remind staff of the eligibility criteria as well as documents that are used to aid in the identification of homeless children and youth.
<i>Strengths</i>	The peer reviewers saw strengths in the State plan’s cross agency collaboration. Multiple school personnel are involved in the identification process and a census is used to ensure children and youth are identified and that services are offered. The SEA targets specific areas of a region where there may be an increase in children and youth experiencing homelessness or mobility and provides personnel and services in those areas to ensure that students are identified and that services are provided. The SEA plans to flag students experiencing homelessness in order to allow LEAs to provide ongoing monitoring of student progress, grades and attendance.
<i>Limitations</i>	It was noted that the State’s plan was somewhat unclear in the description of the four groups who experience homelessness and the plan’s description of methods of identification and needs assessment. The frequency as to how often the census is used could be elaborated on.
<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 used for the prompt resolution of disputes in the State including a specific timeline and protocol for processing the grievance and assuring students will be served during the process.
<i>Strengths</i>	The peer reviewers identified strengths in the State plan’s definitive timeline provided for the dispute resolution process in the State at each level. The peer reviewers saw strengths in the State plan’s requirement that students are immediately enrolled in the school in which enrollment is sought, pending resolution.
<i>Limitations</i>	It was noted that the State’s plan would be strengthened if policies and procedures were clearer and more concise. It was also observed that -the State plan did not provide a specific reference as to whether the grievance is to be received in writing or verbally.
<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 did not provide concise descriptions of programs provided for school personnel to heighten the awareness of the specific needs of homeless children and youth. It was noted that the general descriptions related to how the SEA provides training and professional development opportunities to school and support staff as well as technical assistance and coordination with other agencies.
<i>Strengths</i>	The peer reviewers saw strengths in the State plan’s description of technical assistance, monthly orientations and the dissemination of program information to other agencies.
<i>Limitations</i>	It was noted that the State’s plan is general without specific information or mention of programs provided for principals, teachers, or other school leaders or staff.
<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>	To strengthen the plan, the SEA must provide additional and clear details on whether there are school district/building level trainings. The SEA must also include information on how the SEA provides such training programs to LEA liaisons, school principals, and other school leaders, support staff, and enrollment personnel. It was also indicated that the SEA must provide detail on the content and frequency of training sessions, and explanation of the dissemination of program.

I.4: Access to Services (722(g)(1)(F) of the McKinney-Vento Act)

- **Does the SEA describe procedures that ensure that homeless children have access to public preschool programs, administered by the SEA or LEA, as provided to other children?**

	<i>Peer Response</i>
<i>Peer Analysis</i>	Peer reviewers observed that the State plan provided detail highlighting the collaboration and coordination between the SEA and the LEA as well as community based organizations. However, reviewers disagreed on how well the plan described procedures that ensure that homeless children have access to public preschool programs administered by the SEA or LEA and observed that the plan provided a general overview of collaborative efforts but lacked detail on the specific strategies.
<i>Strengths</i>	The peer reviewers identified strengths in the State plan’s focus on raising awareness of families experiencing homelessness and the plan’s focus on ensuring that space is available to preschool children in both LEA and community-based preschool programs.
<i>Limitations</i>	It was noted that the State’s plan did not provide a description of specific strategies and procedures utilized to ensure children experiencing homelessness 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 State plan focused on enforcing the McKinney-Vento Act and the rights of students experiencing homelessness to enroll immediately in school and to participate fully in school activities, although it was also noted that the State plan indicated that this is an area in which the SEA needs to institute policies and procedures.
<i>Strengths</i>	The peer reviewers saw strengths in the State plan’s description to engage in additional efforts to expand practices and policies that are targeted toward homeless youth and youth separated from school. The State plan indicated that technical assistance will be provided by utilizing alternative educational opportunities like online learning, credit recovers, independent study, internships and supplemental instruction. Identified strengths were also found in the availability of free tutoring for homeless students who are achieving below their peers.
<i>Limitations</i>	It was noted that the State’s plan would be strengthened if it included clearly stated strategies to be used to ensure homeless youth receive appropriate credit for full or partially satisfactorily completed coursework while attending a prior 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>	To strengthen the plan, the SEA must provide clearly stated strategies to be used to ensure homeless youth receive appropriate credit for full or partially satisfactorily completed coursework while attending a prior school.

- **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>	Peer reviewers observed that the State plan ensured that eligible students do not face barriers accessing academic or extracurricular activities by implementing tutoring, targeted supplemental remedial service, allowing for the participating in extracurricular activities, and ensuring homeless students are immediately enrolled. It was also observed that the State plan did not provide substantial detail of procedures to access extracurricular/academic activities. The plan did reference that the needs of the students are assessed and a coordinated plan is academically adopted; however, additional detail was not provided.
<i>Strengths</i>	Peer reviewers identified strengths in the State plan's reference to the utilization of an assessment tool as a way of identifying academic needs and services to provide support, and in the State plan's mention that educational opportunities include online learning and technological literacy.
<i>Limitations</i>	It was noted that the State's plan did not provide a description of strategies to be used to ensure homeless children and youth do not face barriers to activities and educational opportunities. The State's plan referenced that alternative education plans are implemented and that student needs are assessed, however, the State plan did not provide further detail regarding this process or to what extent adjustments are made.
<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>	Peer reviewers indicated that to strengthen the plan, the SEA must include detailed strategies to ensure homeless children and youth do not face barriers to activities and educational opportunities.

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>	Peer reviewers observed that the plan focused on addressing barriers to the enrollment and education of homeless students. The plan as also observed to be well communicated through an SEA-issued Official Communication that establishes rules and procedures to ensure that homeless children and youth can immediately enroll in school. It was also observed that although all the elements required were addressed in the State plan, detail was not provided.
<i>Strengths</i>	Peer reviewers saw strengths in the State plan’s Official Communication, which establishes rules and procedures to ensure that homeless students are enrolled in school while specific items are being resolved. Monthly monitoring visits are made by homeless program staff to ensure compliance with this communication.
<i>Limitations</i>	It was noted by peer reviewers that the State’s plan would be strengthened if further accurate, clear, and concise detail were provided regarding the specific strategies utilized to address other problems with respect to the education of homeless children and youth.
<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 to strengthen the plan, the SEA must provide additional detail on the policies established in the Official Communication document to determine if the SEA and LEAs have appropriate steps in place for compliance.

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>	Peer reviewers observed that the SEA has adopted a statewide plan to address the retention of all students which focuses on the removal of barriers for students so that they may participate fully in school. However, reviewers also observed that to address the requirement, the plan described the Scholar Retention Program and the McKinney-Vento requirements for transportation to school of origin.
<i>Strengths</i>	Reviewers noted strengths in the State plan’s description of the UNARE project which provides assistance to students, including homeless students toward continued enrollment and academic success. The UNARE project monitors attendance and low academic achievement while also taking other family needs into consideration and providing assistance. It was also noted that the SEA plan is statewide and based on the specific needs of the community.
<i>Limitations</i>	It was observed that the State’s plan provided limited information on specific strategies that are used to ensure that LEAs have plans in place to review and revise policies that may be barriers for homeless children and youth, and that the program description did not address the requirement.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> No (3) Reviewers
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	Peer reviewers indicated that to strengthen the plan, the SEA must provide clearly stated strategies that are used to ensure that homeless children and youth do not face barriers to 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.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 described the expectation that school counselors provide support to students experiencing homelessness and outlines the many ways that school counselors can assist students and receive technical assistance and training regarding working with students experiencing homelessness. It was also noted that the plan included a general assurance that counselors are working with homeless students but that little detail is provided.
<i>Strengths</i>	The peer reviewers identified strengths in the State plan’s description of how the PRDE will certify all high school counselors in college orientation and guidance, which will enable school counselors to provide students the guidance that they need to prepare for college.
<i>Limitations</i>	It was noted that the State’s plan did not provide information related to how often school counselors are currently (or in the future) working with students toward college readiness. The descriptions in the State plan were not clear and concise.
<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 to strengthen the plan, the SEA must provide information related to how often school counselors meet with students and include information about notifying students of their McKinney-Vento determination, and as an unaccompanied homeless youth, and specifically how that designation is important when completing the FAFSA.