

# STATE PLAN

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

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State Name: Rhode Island



**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>	Peer reviewers observed that the State’s plan described identification and needs assessment procedures with reference to specific protocols for implementation of these requirements.
<i>Strengths</i>	The reviewers identified strengths in the State’s regulations establishing protocols for identification and data collection and in the State’s use of a needs assessment to identify academic, social, and emotional needs of individual students.
<i>Limitations</i>	The plan was noted as having limitations in the description of the initial identification process, monitoring and tracking strategies, the needs assessment at the State level, and local liaison training.
<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>	Reviewers noted that the plan could be strengthened by providing additional information regarding training and monitoring procedures related to identification and needs of homeless children and youth.

**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>	Peer reviewers observed that the dispute resolution process is outlined in State statute and has been revised to include protections for homeless children and youth.
<i>Strengths</i>	Peer reviewers noted that State regulations regarding dispute resolution have been strengthened for homeless youth and children experiencing homelessness. The Commissioner of Education is noted to have authority to issue interim protective orders to allow continuity in school attendance during the dispute process and enrollment in the school preferred by the parent or youth during a dispute (along with provision of transportation to the school).
<i>Limitations</i>	Peer reviewers indicated that the plan provided a limited description of the role of the State Coordinator, and needed clarification on whether the law is specific to McKinney-Vento or an option for all students, how eligibility disputes are addressed, how liaisons are trained to implement the process and what support the SEA provides to LEA in developing their local procedures. Reviewers also noted that the plan did not describe timelines beyond a reference to prompt and expeditious resolution, and did not describe monitoring of LEAs to ensure policies are compliant.
<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 the plan could be strengthened by describing how eligibility disputes will be addressed, provide timelines, and describe the role of the State coordinator in supporting LEA dispute processes (including training, monitoring, technical assistance, and review of actual 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 reviewers observed that the plan described a variety of tools, liaison training, and technical assistance provided by the State Coordinator to local homeless liaisons.
<i>Strengths</i>	Reviewers noted that the plan described an adequate array of supports for local liaisons including annual training for all liaisons (including turnkey resources to train local staff), resources from NCHE and other national trainings, and monitoring for Targeted Homeless Assistance grants.
<i>Limitations</i>	Reviewers indicated that the plan did not clarify the required training for local liaisons, monitoring strategies, or how personnel in non-subgrant LEAs will be trained. Reviewers also noted that runaway youth are not mentioned specifically in 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>	

**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 plan described preschool children experiencing homelessness having access to the supports to which they are entitled, but did not describe those supports.
<i>Strengths</i>	Reviewers indicated that strength of the plan’s response to this requirement was the statement that the State Coordinator will provide technical assistance.
<i>Limitations</i>	Reviewers noted that the statement regarding technical assistance did not clarify to whom technical assistance will be provided or why, and did not include a description of collaborative efforts across Pre-K and McKinney-Vento at the State or local level. Additionally, it was noted that there the plan did not describe procedures to ensure access or reference data collection to analyze and track access to preschool for children experiencing homelessness.
<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 plan could be strengthened by including specific procedures at the SEA and LEA levels to ensure children experiencing homelessness have access to public preschool. Reviewers also noted that a description of State-level collaborations could be included (such as special education, Head Start, Title I pre-K, and any other State-level programs and community agencies).

- **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>	Peer reviewers observed that the State’s plan needed more detail and needed to reference the role of the State and State Coordinator in ensuring that homeless youth receive appropriate credit for full or partial coursework satisfactorily completed.
<i>Strengths</i>	Peer reviewers indicated that the plan described work with students and families to meet their needs, including an assurance that barriers to full participation in school would be removed, and that credit accrual and graduation will be permitted. Also, the plan referenced a potential strategy to review and revise policy in the Consolidated Resource Plan.
<i>Limitations</i>	Reviewers noted that the plan did not include procedures but provided a statement of assurance that the issues in the requirement will be addressed.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1) Reviewer <input checked="" type="checkbox"/> No (2) Reviewers
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The reviewers noted that the plan would be strengthened by describing procedures the SEA will implement to ensure the removal of barriers (to include State-level collaborations, training, technical assistance, monitoring, and data analysis to identify trends, such as tracking of the graduation rate). Additionally, reviewers noted that the plan should describe procedures for reaching and supporting out of school youth.

- **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’s plan did not address procedures at the State level to ensure the removal of barriers to allow homeless children and youth to access academic and extracurricular activities listed in this requirement.
<i>Strengths</i>	Reviewers identified strengths in the plan’s discussion of collaboration efforts, noting that liaisons are encouraged to work with other programs to support student participation in extra-curricular activities. Also noted was that the plan stated that ensuring homeless children and youth access to academic and extracurricular activities is the responsibility of the local liaison.
<i>Limitations</i>	Peer reviewers indicated that the plan did not address compliance procedures and did not describe procedures to remove barriers to summer school, magnet schools, career and technical education, advanced placement, online learning, or charter school programs. Additionally, it was noted that the role of the State Coordinator was not listed in this response, nor did it mention training, technical assistance, monitoring or data tracking to analyze progress and challenges.
<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 stated that the plan would be strengthened by describing procedures the SEA will implement to ensure the removal of barriers (including State-level collaborations, training, technical assistance, monitoring, and data analysis to identify trends).

**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 referenced a State regulation for immediate enrollment, but did not provide strategies or reference the State’s plan for addressing enrollment delays.
<i>Strengths</i>	Peer reviewers identified strengths in the plan’s discussion of immediate enrollment, noting that liaisons are responsible for assisting families in obtaining missing documents.
<i>Limitations</i>	The reviewers stated that the plan did not provide specific strategies LEAs can utilize relative to 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>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>	Reviewers stated that the plan could be strengthened by specifically addressing strategies to address problems resulting from enrollment delays that are caused by requirements of immunization and other required health records; residency requirements; lack of birth certifications; school records or other documentation; guardianship issues; or uniform or dress code requirements. Additionally, it was noted that training and monitoring could be described relative to this requirement.

**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 State’s plan described how the State Coordinator supports liaison review of policy and that only larger LEAs have a formal process through the Consolidated Resource Plan. It was also noted that the plan did not reference identification, outstanding fees or fines, or absences.
<i>Strengths</i>	Reviewers saw strengths in the plan’s discussion of supports provided by the SEA to LEAs in monitoring local policies and in identifying potential barriers. It was also noted that policy revisions, remedial measures and corrective action are discussed as ongoing efforts.
<i>Limitations</i>	Reviewers indicated that the plan did not provide details relative to specific barriers noted for this requirement (including policies related to outstanding fees or fines, or absences). Additionally, the plan did not describe how all LEAs are held accountable for reviewing and revising policies.
<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 reviewers indicated that the State’s plan could be strengthened by addressing State and local policy review and address all elements listed in the requirement, as well as how the State ensures that all LEAs review and revise 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>	Peer reviewers observed that the State’s plan provided a description of how youths will receive assistance in improving their readiness for college.
<i>Strengths</i>	Reviewers saw strengths in how the State’s plan detailed the various types of assistance provided, including assistance with FAFSA applications and the implementation of Individual Learning Plans (ILPs), a requirement of State regulations. Credit accrual was included, along with other college preparation activities and collaboration with other organizations to improve supports for youth experiencing homelessness.
<i>Limitations</i>	Peer reviewers noted that the plan did not describe how the State will ensure counselors provide assistance via monitoring.
<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>	It was noted that the plan could be strengthened with additional discussion of the activities to ensure counselors are reaching students experiencing homelessness, including a review of ILPs for these students as a part of the monitoring process. Also, it was noted that the plan should include a discussion of technical assistance to be provided at school counselor conferences, trainings and webinars for liaisons.