

STATE PLAN

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

State Name: Tennessee



U.S. Department of Education
June 21, 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 observed that there is no dedicated section within the plan to address this requirement and the plan lists no specific activities that ensure appropriate identification is taking place at the local level. However, it was observed that the plan identifies the following strategies to support district homeless liaisons for identifying homeless children and youth, including: the student residency form that all districts may utilize, the annual training that is provided to districts that specifically addresses the identification of students who may be experiencing homelessness, and the collaboration efforts with the early childhood education state coordinator to support local school officials with early childhood homeless identification.
<i>Strengths</i>	The peer review panel observed that the strengths of section of the plan are: the EHCY State Coordinator encourages LEAs to use a student residency questionnaire provided by the SEA, training is offered to liaisons and other stakeholders at least annually, and the plan is clear in the collaborative efforts and tools offered to support district liaisons in the identification of students experiencing homelessness.
<i>Limitations</i>	<p>The peer review panel observed that there is no description of procedures beyond the recommendation to use a residency questionnaire. Meanwhile, the plan does not indicate how data will be captured and tracked. Specifically, there is no description of how data are used to determine the reasonableness of the identification done at the local and State level. Moreover, the peer review panel observed that the described training references the impact of homelessness, but does not address how needs are assessed at the individual student level, nor how LEAs and the SEA analyze their data to identify systemic issues/needs. It was determined by the peer review panel that the plan could be enhanced by including the data collection process that is conducted annually.</p> <p>It was also observed by the peer review panel that the plan merely indicates that the State Coordinator will advise districts regarding identification and enrollment. However, this is vague and does not address what activities will be used to attain effective identification and enrollment. The panel observed that it may be inferred from the plan that the use of the residency questionnaire is voluntary. If it is, the plan does not describe other resources that are available to districts.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (3) reviewers

<p><i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i></p>	<p>The peer review panel observed that the language in the plan related to this requirement is very general. There is little information indicating current program status, progress achieved, or particular problem areas that need to be addressed going forward. The plan primarily restates language from the McKinney-Vento law and the U.S. Department of Education’s non-regulatory guidance.</p> <p>Moreover, it was observed the plan needs more specificity about the minimum acceptable identification activities expected of all districts and what the State Coordinator will do to support and monitor those LEAs. As an example, the State Coordinator can provide posters (available from the National Center for Homeless Education) for local distribution to all schools, shelters, and other locations where homeless families and youth might see them.</p> <p>As another example, the State Coordinator or local homeless liaisons can send information or conduct awareness activities for shelter providers and social services personnel. For these or other activities, LEA monitoring would then examine the extent to which they are done. Furthermore, the plan should describe needs assessment activities to be carried out to identify areas for improved program operation and delivery of services. Indeed, the panel observed the plan could be improved by providing a needs assessment and a description of how the State Coordinator will conduct activities to support local liaisons.</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 review panel observed that the dispute resolution process, contained in Appendix Q, is the most detailed part of the plan. It is clear in its description and timelines, and has components that apply to the local and State levels. However, members of the panel observed that what is not clear from the plan is whether this process is a State-level policy and therefore automatically applicable to all LEAs.
<i>Strengths</i>	The peer review panel observed that strengths of this section of the plan include: it recognizes that the prompt resolution of disputes is critical; it contains a clear description of the dispute resolution process; and the process includes eligibility, school selection, and educational placements with specific timelines that are consistent with ESSA.
<i>Limitations</i>	The peer review panel observed that this section of the plan could be improved by making clear whether the process described is a State-level policy, and therefore applicable to all districts as well. The peer review panel also observed that, just as importantly, the plan should make clear that local dispute resolution processes need to be reviewed by the EHCY State Coordinator to ensure they align with the requirements of the State. Finally, the plan could be improved by describing how a parent, guardian, or unaccompanied youth can initiate and/or continue an appeal (i.e. written or verbal notice). It was also observed that the plan lacks a description of how liaisons are trained to implement the dispute resolution process and how it will be monitored for appropriate implementation.
<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.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 observed that there is no dedicated section to address this requirement and the plan lacks a coherent description of programs to heighten awareness beyond noting that the State Coordinator must provide training at least annually. Specifically, the plan mentions professional development in several places, but the plan includes no details about how the training will take place, priority topics to be included, or the training’s target audiences. The plan does not discuss whether local liaisons also have a role in providing professional development to local personnel.
<i>Strengths</i>	<p>The peer review panel observed that although it is unclear from the plan regarding its role, the Advisory Council could assist in shaping programs to heighten awareness.</p> <p>Specifically, the Advisory Council is responsible for advocating for policies, practices, and procedures that may impact the education of homeless children and youth. This team facilitates local level collaboration and supports the State Coordinator in determining the delivery and supports that are needed in the State. The peer review panel observed that the Advisory Council could play a significant role in identifying needed topics, audiences, and formats.</p>
<i>Limitations</i>	<p>Members of the peer review panel observed that there is no coherent description of programs to heighten awareness beyond noting that the State Coordinator must provide training that includes the impact of homelessness on students. The training is offered to liaisons and other stakeholders, but there is no further detail regarding these stakeholders. There is no reference to the new ESSA requirement that all local liaisons participate in training as determined by the State Coordinator, nor is there any reference to supporting liaisons in training school personnel which is explicit in ESSA. Avenues beyond the mention of training, such as website, letters and emails, publications and posters to heighten awareness are not indicated in the plan.</p> <p>Other members of the peer review panel observed that the plan only mentions stakeholders and does not describe programs or trainings in any detail on runaway and homeless youth. Meanwhile, it was observed that one annual professional development event is unlikely to cover the needed topics in sufficient depth, and that more detail is needed regarding how the various constituencies will access the professional development that they need. Finally, the peer review panel observed that data are not cited that would guide what topics are to be prioritized in trainings and what role, if any, that local liaisons will play in providing local professional development.</p>

<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>	<p>The peer review panel unanimously observed that the plan should be improved to describe multiple means to heighten awareness for a variety of school personnel, including how it will implement the new ESSA requirement of mandated liaison training and how liaisons will be supported to fulfill their training of school personnel. The peer review panel observed that the plan should be improved by adding a discussion regarding the type of platforms that will be used to deliver the trainings, such as conducting annual regional compliance forums, offering web-based trainings, on-site trainings at LEAs, providing technical assistance, conducting district needs assessments with liaisons, monitoring LEAs, developing an informational website, displaying posters, and assisting liaisons with training materials to use at the local level.</p>

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 observed that there is no dedicated section to address this requirement within the plan and preschool program is only mentioned once. It was observed that the EHCY State Coordinator collaborates with the early childhood state coordinator to guide districts in identification and creating a best interest determination; however, there is no description of the procedures that will ensure children’s <i>access</i> to preschool programs at the State or local levels. Specifically, the peer review panel observed that the plan mentions collaborating with the early childhood coordinator to ensure access, but gives no specific activities for how this will occur.
<i>Strengths</i>	The peer review panel observed the plan enumerates minimum elements of a best interest protocol for use in access to preschool programs. Moreover, the plan indicates policies and procedures are a priority in the collaborative efforts at the State level in promoting best interest determinations, availability, and access to meet the diverse educational and developmental needs of young children.
<i>Limitations</i>	The peer review panel observed that there is no description of strategies to identify young children nor increase their access to preschool programs (e.g., identifying younger siblings on school enrollment forms, prioritizing homeless young children for available early childhood slots and on waiting lists, training early childhood providers on McKinney-Vento, etc.). There is no reference to data collection to track progress. Furthermore, the peer review panel observed that the State Coordinator will only guide districts on preschool identification and enrollment, and that there is no discussion of the minimum activities that should take place at the local level or of the resources that will be made available. Finally, it was observed that there is no description about the expected outcomes of the collaborations or the methods to be used to provide needed training to key constituencies.
<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>	<p>The peer review panel unanimously agreed that the plan should be improved to describe a set of activities to be used, at a minimum, to foster appropriate identification and enrollment of preschool children. The plan should discuss the outcomes expected from the collaboration with the early childhood coordinator and give consideration to other target audiences needing information and/or training on this issue.</p> <p>The peer review panel observed such strategies that may be described in the plan can include: providing sample policies for districts to incorporate into their local plans; reviewing local plans with the office of early education to ensure the criteria is being met; and/or developing brochures, training materials/handouts, etc. for parents and school officials.</p>

- **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>	<p>The peer review panel observed that there is no dedicated section to address this requirement and the issue of credit accrual is only mentioned twice in the plan.</p> <p>The peer review panel observed that the plan mentions access to academic and extracurricular activities for homeless students and indicates it will provide technical assistance to liaisons for developing policies and practices that improve student outcomes, promotes retention, and eliminates barriers. In addition, the plan mentions students having access to online programs, independent study programs, and learning opportunities in various platforms so that students can receive appropriate credit for full or partial coursework. There is also mention that multi-tiered systems of support are included in the process to ensure students have equal access to appropriate secondary education. However, beyond these mentions the plan lacks detail. Specifically, the peer review panel observed that there are no activities described to ensure identification of unaccompanied youth or to ensure they receive needed services and support.</p> <p>Meanwhile, the peer review panel observed that out-of-school youth are solely mentioned in the Migrant Education Program section of the plan and that there is no description to support youth experiencing homelessness. There are no details and no further description that responds to this requirement. Finally, the peer review panel observed that the State Coordinator will work with other State agency personnel to issue joint guidance on credit accrual and other areas, but those other areas are not provided.</p>
<i>Strengths</i>	<p>The peer review panel observed that there is a plan to issue joint guidance on credit accrual. It was also observed that the State Coordinator will share practices, policies, and procedures with local homeless liaisons to assist districts with ensuring homeless students are afforded equal access.</p>
<i>Limitations</i>	<p>The peer review panel observed that more details are needed in the plan. Specifically, the plan restates the U.S. Department of Education’s non-regulatory guidance regarding State Coordinator responsibilities, but the plan does not describe the kinds of activities the State Coordinator will engage in to ensure those responsibilities. Furthermore, no data are cited to indicate the extent to which access to secondary education and services by homeless youth is a problem. Meanwhile, if access to secondary education and services by homeless youth is a problem, the plan does not describe what aspects will need to be addressed.</p>
<i>Did the SEA meet all requirements?</i>	<p><input checked="" type="checkbox"/> Yes (1) reviewer</p> <p><input checked="" type="checkbox"/> No (2) reviewers</p>

<p><i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i></p>	<p>The peer review panel observed that the plan must describe how the SEA works with LEAs to identify youth, including those separated from school, and how those youth are ensured access to school and support services. Meanwhile, the peer review panel observed that the plan needs to be much more specific about the minimum acceptable identification activities for youth expected of all districts and what the State Coordinator will do to provide specific resources, arrange or conduct training for key constituencies, and monitor the outcome of local identification efforts. Finally, it was observed the plan should include more detail about how credit accrual and credit transfer are expected to be addressed through the joint guidance.</p>
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- **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 observed that the plan does not adequately address accessing academic and extracurricular activities including magnet, summer school, technical education, etc. Specifically, the peer review panel observed that there is no dedicated section to address this requirement. Beyond a statement that the State Coordinator will advise districts on steps to ensure there are no barriers to academic and extracurricular, no actual procedures are described. The specified programs in the requirement are not referenced.
<i>Strengths</i>	None identified
<i>Limitations</i>	The peer review panel observed that the plan indicates that the State Coordinator will advise districts regarding access to academic and extracurricular activities, but describes no actual procedures to be followed. This is vague and does not address what will be done to ensure that barriers are identified and addressed.
<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 peer review panel unanimously agreed that the plan should be improved to describe procedures and programs. Specifically, it was observed that the plan should be improved to provide a specific discussion of current procedures for ensuring access to both extracurricular activities and the various academic programs listed, as well as description of what will be done going forward to ensure that priority areas of this issue are identified and addressed, as well as that current procedures are reviewed and updated.

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 observed that there is no dedicated section to address this requirement and the plan does not address immunizations, residency requirements, birth certificates or other enrollment documentation, guardianship, or any uniform codes. Specifically, it was observed that the plan provides little information on the SEA’s approach to addressing enrollment delays, other than restatement of the requirement. Beyond a statement that the State Coordinator will advise districts on steps to ensure there are no barriers, no actual strategies are described.
<i>Strengths</i>	None identified
<i>Limitations</i>	The peer review panel observed that the plan does not describe strategies specified in the requirement. The plan restates the U.S. Department of Education’s non-regulatory guidance regarding State Coordinator responsibilities, but does not describe specific activities the State Coordinator will engage in to address the problems. It was observed that statements regarding technical assistance are very generic and that there is no information on the extent to which enrollment delays are a problem and, if so, what aspects need to be addressed.
<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 peer review panel unanimously agreed that the plan should be improved to describe the SEA’s strategies for all elements specified in the 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>	The peer review panel observed that there is no dedicated section to address this requirement. Under a section entitled, “Coordination with Title I, Part A,” there is a statement that districts review and revise policies to remove enrollment barriers. It was also observed that the plan does discuss State and local policies to address barriers to identification, enrollment, and retention, but does not discuss what the actual policies are or how they will be reviewed and, if needed, revised. No mention is made of barriers to enrollment and retention due to outstanding fees, fines, or absences. The Advisory Council could be a venue to garner input on policies and procedures, but doing so is not specifically indicated in the plan. A more intentional process for reviewing and updating policies should be described, including review of local policies during monitoring.
<i>Strengths</i>	The peer review panel observed that a strength of this section of the plan is that the Office of the State Coordinator will work closely with other programs to develop and revise policies and procedures, as appropriate. An additional strength is that district policies must align to State code. Finally, it was observed that the Advisory Council can be an asset for identifying policies in need of review and revision, as well as in setting priorities for professional development, technical assistance, and potential collaborations.
<i>Limitations</i>	The peer review panel observed that the plan does not address waiving fees, fines, and absences. Meanwhile, it was observed that the plan indicates that the State Coordinator will provide support and technical assistance regarding local policies and procedures, but gives no details about how that will occur. Likewise, the plan indicates that districts will review and revise policies, but it gives no details about how that will occur. Finally, it was observed that the SEA’s review of policies and how LEAs will be monitored to ensure local review and revision occurs are not addressed.
<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 peer review panel unanimously agreed that the plan should be improved to describe how the SEA collects information to review policies (including its process to conduct the actual review and revision), how it monitors LEAs to ensure local review and revision occur, and how barriers to enrollment due to fees, fines, and/or absences will be removed. Furthermore, it was observed by the peer review panel that the plan could be improved by specifically describing technical assistance, training, enrollment and retention, fees, fines, absences, discipline, immunizations, and contacting parents, guardians, and unaccompanied homeless youth.

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 observed that there is no dedicated section to address this requirement. Other than a statement that districts must ensure students have assistance from school counselors, there is no description of how students will receive assistance from counselors or what the assistance will entail. Furthermore, the peer review panel observed that there is no reference to college readiness and no description of professional development opportunities provided to counselors that will include information and resources needed to work effectively with homeless youth, n or of policies that would ensure access to such assistance.
<i>Strengths</i>	None identified
<i>Limitations</i>	The peer review panel observed that the plan indicates that districts must ensure students receive assistance from school counselors, but there is no reference to how homeless youth will be included in college readiness initiatives at the SEA and LEA level. Meanwhile, it was observed that there is no reference in the plan to training local liaisons and school counselors to fulfill this requirement. There is no reference to notifying unaccompanied homeless youth of their independent status on the FAFSA nor on how this will be monitored to ensure local implementation and utilization of graduation rates as a means to track progress.
<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>	<p>The peer review panel unanimously agreed that the plan should be improved by providing a description of specific activities that will ensure homeless youth are included in college readiness initiatives, how they may receive advice from school counselors (including their FAFSA independent student status), and how the SEA will track implementation and progress. The plan could furthermore be improved to describe professional development opportunities, resources, and technical assistance provided to counselors via the State Coordinator’s office, the State Office for School Counselors, and by the local district’s homeless liaison.</p> <p>The peer review panel indicated specific suggestions include revising the plan so that it describes disseminating information to graduating unaccompanied homeless youth (UHY) and sharing information with school counselors annually to guarantee each UHY has the documentation needed to support their status when applying for FAFSA as homeless. For example, it was observed that a roster of students receiving the verification form could be maintained by district homeless liaisons and made available during the Program Review Plan that will be conducted by the State Coordinator. Finally, the plan could be improved by describing professional development activities and opportunities that will be provided to counselors.</p>

