

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

State Name: Utah



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 described a commitment to identify, assess needs, and provide supports for homeless students. The State’s plan includes intent to create a common needs assessment using information that is gathered through collaboration with community agencies. Strategies used to identify homeless children and youth include forms used in the enrollment process, informal identification through peers, self-identification and community referrals.
<i>Strengths</i>	The peer reviewers identified strengths in the State plan’s detail regarding how children and youth are identified anytime throughout the school year and not just at the time of enrollment. Peer reviewers also noted strengths including the development of a common needs assessment to fill in the gaps in services provided to homeless students.
<i>Limitations</i>	It was noted that the State’s plan did not describe training for staff on the identification of homeless children and youth. It was also noted that that plan did not include whether or not materials are provided to families in a format that is easy to understand or how supports are provided to students or families who cannot read. It was also noted that the State’s plan did not indicate whether information pertaining to the identification of homeless children and youth is provided in the community where homeless individuals and families may frequent such as hotels, motels or public libraries. It was not clear to reviewers that the common needs assessment was utilized for all students (students who had enrolled that year and returning students) at some point in the academic school year and was related to housing or to incorporate housing questions within the survey already being administered to the students.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3) Reviewers
<i>If no, describe the specific information or clarification that an SEA must provide to</i>	

<i>fully meet this requirement</i>	
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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>	Peer reviewers observed that the State plan provided specific procedures for a prompt resolution of dispute and that the plan provided an outline as to how the dispute is addressed at the building level, district level, and at the USBE for final resolution, if needed. It was also observed that the State plan did not provide specific timeframes.
<i>Strengths</i>	The peer reviewers identified strengths in the State plan’s clear and concise policy, including the identification of a point of contact at the LEA for the parent, guardian or unaccompanied homeless youth with regard to resolving a dispute.
<i>Limitations</i>	It was noted that the State’s plan did not include specific timeframes for each phase of the process (such as a timeline) for a final decision.
<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>	Peer reviewers observed that the State plan’s description of programs to heighten awareness was comprehensive including a description of professional development activities provided to stakeholders across the State regarding the needs of homeless children and youth. It was also noted that the plan did not provide specific information regarding programs that will be utilized to heighten awareness of the needs of homeless children and youth or reference runaway and homeless youth.
<i>Strengths</i>	The peer reviewers identified strengths in the State plan’s description of the annual opportunity for professional development and the plan’s description of school support programs. The peer reviewers also noted the commitment to continuous improvement for staff.
<i>Limitations</i>	It was noted that the State’s plan did not specifically reference runaway and homeless youth. Peer reviewers also observed that the State plan described instructing liaisons on how to disseminate information to local school staff and ensuring liaisons carry out the dissemination of information to local school staff, but did not discuss how or if this training is tracked and what specific strategies are utilized.
<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 would be strengthened if the SEA provided further detail on what types of activities or strategies the liaisons are being instructed on in order to disseminate information to local school leaders, teachers, attendance officers, and other school personnel. The SEA must provide detail regarding when or how the SEA will offer professional development sessions, including a description of content, how often the sessions will occur, and whether sessions will be role-specific or general.

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, peer reviewers disagreed on how well the State’s plan described procedures that ensure that homeless children have access to public preschool programs administered by the SEA or LEA. Peer reviewers also observed that the plan provided a general overview of collaborative efforts but did not provide 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 discussion on making 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 (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 detail about how outreach will take place including detail on whether public preschool programs will set aside slots/seats for children identified as homeless and how those slots or seats will be funded. The SEA must provide detail about how preschool aged children will be identified whether through enrollment forms or intake forms to gather information about preschool siblings in the home.

- **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 provided a general description of policies and procedures that the SEA and LEA already have or will put into place to ensure that students experiencing homelessness can receive full or partial credits for courses students have satisfactorily completed at a previous school. General assurances are described regarding appropriate follow-up services to be considered to help support students once they have been identified. Peer reviewers noted that the State plan did not reference particular categories of homeless students, their access to appropriate secondary education, or the removal of barriers to ensure the student receives full or partial credit for coursework completed at a previous school.
<i>Strengths</i>	The peer reviewers identified strengths including the State plan’s description of ensuring LEA liaisons and registration staff are trained on the signs of homelessness as well as the plan’s description of general policies and an understanding of the need to identify homeless students and remove barriers to their education.
<i>Limitations</i>	The plan did not specifically reference accrual of full or partial credits.
<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 noted that the State’s plan would be strengthened if the plan included detail pertaining to procedures that are in place for ensuring that youth experiencing homelessness, beyond the point of enrollment, are identified and have access to appropriate services to remove educational barriers. The SEA must provide details regarding specific ways in which students coming from another school or LEA will be able to receive full or partial credit for coursework that has been satisfactorily completed.

- **Does the SEA describe procedures that ensure that homeless children and youth who meet the relevant eligibility criteria do not face barriers to accessing academic and extracurricular activities, including magnet school, summer school, career and technical education, advanced placement, online learning, and charter school programs, if such programs are available at the State and local levels?**

	<i>Peer Response</i>
<i>Peer Analysis</i>	The peer reviewers observed that the State plan provided a description of the SEA’s understanding of the State laws regarding discrimination, but did not describe strategies to remove barriers.
<i>Strengths</i>	The peer reviewers identified strengths in the State plan’s commitment toward non-discriminatory practices and understanding of the laws regarding discrimination.
<i>Limitations</i>	It was noted that the State’s plan did not provide a description of the procedures that will be implemented to ensure that students experiencing homelessness have equal access to educational opportunities and extracurricular activities.
<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 noted that the State’s plan would be strengthened if the plan provided specific procedures and activities that will be implemented to ensure that homeless children and youth who meet relevant eligibility criteria do not face barriers to accessing academic or extracurricular activities. The SEA should include additional strategies in addition to liaisons advocating for their students.

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 State plan provided specific strategies to address potential barriers for students experiencing homelessness. It was also noted that the State plan provided strategies utilized to assist students experiencing homelessness in either obtaining needed documents or waiving requirements for immunization and health documents, residency requirements, lack of birth certificates, guardianship issues, and uniform requirements.
<i>Strengths</i>	The peer reviewers identified strengths in the State plan’s description of ongoing professional development for liaisons to ensure that barriers are minimized. The peer reviewers also noted strengths in the State plan’s ongoing monitoring for LEA sub-grant and non-subgrant recipients. The peer reviewers also observed strengths in the State plan’s detail regarding the USBE Board Rule that will be created to address specific areas of concern for students experiencing homelessness.
<i>Limitations</i>	It was noted that the State’s plan would be strengthened if the plan included additional details regarding how the lack of immunizations or records will be addressed, as well as how dress code requirements would be addressed and funded.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3) Reviewers
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

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

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

	<i>Peer Response</i>
<i>Peer Analysis</i>	Peer reviewers observed that the State plan described the utilization of a needs assessment to help LEAs develop, review and revise policies to remove barriers for students experiencing homelessness, with the results of the needs assessment being used to create a policy by the USBE that will address the removal of barriers. Following the development of the policy, the USBE staff will provide training and technical assistance to ensure district inclusion of new and revised policies. Peer reviewers also observed that the USBE policy was yet to be created to address barriers to enrollment and retention due to outstanding fees, fines, or absences.
<i>Strengths</i>	The peer reviewers identified strengths in the State plan’s reference to using a needs assessment and utilizing the results to prepare documentation that will create a board rule or policy to develop best practices based on actual results from the community.
<i>Limitations</i>	It was noted that the State’s plan did not reference outstanding fees, fines, or absences. Peer reviewers noted that the Board rule or policy is planned but not currently in place.
<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 peer reviewers indicated that provision of further detail on the developing the Board rule or policy would strengthen the plan. This could include how excessive absences directly related to the homeless situation will be handled, and if there would be opportunities to make up missed instruction time.

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 reviewers observed that the State plan described coordinating McKinney-Vento services with the Workforce Innovation and Opportunity Act (WIOA) and other community resources to prepare students for college and careers. Assistance from counselors is provided to all students through an existing counseling program.
<i>Strengths</i>	The peer reviewers identified strengths in the State plan’s description of a comprehensive, systemic approach to individual student planning for college. There is an existing counseling program which is available to all students which ensures that student’s needs are identified and that students are connected with resources to help them become college or career ready.
<i>Limitations</i>	Peer reviewers noted that the State’s plan did not provide detail regarding the frequency of contact with students or whether unaccompanied homeless youth are provided the documentation of their rights. Peer reviewers also observed that the State’s plan did not include information regarding the local liaison ensuring that all high school students experiencing homelessness receive individualized counseling pertaining to college readiness, college selection, the application process, financial aid, and the availability of on-campus supports. The plan was unclear to reviewers as to whether all students receive such individualized counseling.
<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>	