

# STATE PLAN

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

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State Name: Virginia



**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>   |
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| <i>Peer Analysis</i> | The peer reviewers found that the SEA described a list of activities supported and monitored by the State Coordinator and designed to improve the identification of homeless children and youth. Described activities included dissemination of information briefs and posters, the use of the HOPE website, presentations to groups that work with homeless children and youth and/or their families, online training, data system and collection processes, and needs assessment. However, reviewers noted that the SEA did not describe specific procedures it uses to identify and assess needs of homeless children and youth in the State or provide a discussion of expected types of identification activities LEAs should undertake.  |
| <i>Strengths</i>     | Peer reviewers identified strengths including that the SEA described a list of activities and a variety of resources. The plan provided a description of the types of groups receiving presentations; the systematic process to capture, track, and verify homeless student counts; the infrastructure to maintain these processes; the discussion with local liaisons regarding the homeless identification rate (child count data based on the local poverty rate) in training and during monitoring; posting of longitudinal statewide identification rates on the HOPE homepage, and distribution of posters and brochures. Additional activities include sharing sample intake and needs assessment forms, and suggestions for using disaggregated achievement data in determining an appropriate Title I, Part A reservations. Also described was how the SEA used its Advisory Board to identify unmet needs and emerging needs that would require a State-level response. Enrollment data are also cross-checked and can trigger monitoring. |
| <i>Limitations</i>   | Peer reviewers noted that the SEA did not include specific copies of or links to established SEA or LEA policies or procedures pertaining to the identification of homeless children and youth. However, the plan did refer to the systematic process and infrastructure required to capture, track, and verify homeless student counts, as well as, the many activities in place designed to identify students. Although the SEA described activities that provide opportunities for discussion of needs, sharing of sample forms,  |

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|   | <p>suggestions for using data to assess needs, and its work with its Advisory Board, reviewers noted that it did not describe a specific State-level comprehensive needs assessment process to determine statewide needs of homeless children and youth. The plan would also benefit from additional discussion of the expected set of actions that liaisons should take to ensure that identification efforts are thorough. The narrative mentions receiving posters and coordinating with community agencies, but more detail would be helpful.</p> |
| <p><i>Did the SEA meet all requirements?</i></p>  | <p><input checked="" type="checkbox"/> Yes (3) Reviewers</p>  |
| <p><i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i></p> |   |

**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>  |
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| <i>Peer Analysis</i>                      | Peer reviewers observed that the SEA has revised its dispute resolution processes (for eligibility and school selection) to reflect the new requirements. The SEA provided a link to Superintendent’s Memo #215-17 that included a description of the changes from the 2005 process, as well as copies of the Dispute Resolution Process for Eligibility, the Dispute Resolution Process for School Selection or Enrollment, the McKinney-Vento Best Interest Determination for School Placement form, and the Written Explanation of McKinney-Vento Determination form. The new dispute process is adopted by the State School Boards Association and disseminated to districts. Reviewers also noted that LEAs are provided resources to assist their local procedures, which are reviewed for appropriateness.   |
| <i>Strengths</i>                          | Reviewers agreed that the State has a well-constructed dispute resolution procedure that was adopted by the Virginia School Boards Association and disseminated to LEAs. An updated policy, revised for ESSA, was announced in July and will be presented at a statewide meeting; the policy contains timelines and communication requirements. Reviewers also noted that the SEA revised its feasibility form to focus on best interest, created a separate dispute resolution process for eligibility issues to streamline the appeal process, shortened timelines for school of origin or school selection appeals, updated all prior forms, and provided more detailed directions. The State Coordinator also provides sample letters and other resources to help ensure consistency of local procedures across districts. It was also noted that local dispute plans are reviewed during monitoring. |
| <i>Limitations</i>                        | Peer reviewers noted that at the local level, the dispute resolution process for school selection or enrollment did not include a specific timeline. Rather, the parent, guardian, or unaccompanied youth is referred to the designated school division representative to carry out the local dispute resolution process as expeditiously as possible once notified, or to Project HOPE-Virginia if there is no interim appeal in the local dispute resolution process. This process would be strengthened if a specific timeline was provided like those provided for the State Coordinator and Superintendent or designee, and if clearer ways to inform parents and youth were included.   |
| <i>Did the SEA meet all requirements?</i> | <input checked="" type="checkbox"/> Yes (3) Reviewers   |
| <i>If no, describe the</i>                |   |

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| <i>specific information<br/>or clarification that<br/>an SEA must provide<br/>to fully meet this<br/>requirement</i> |  |
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**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>  |
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| <i>Peer Analysis</i>   | Peer reviewers observed that the SEA described programs or activities for liaisons, school personnel, and others that are designed to heighten awareness of the specific needs of homeless children and youth as well as the requirements of the McKinney-Vento Act. It was noted that the plan described multiple means of delivering professional development to the various constituencies, using resources tailored to their position and responsibilities. However, peer reviewers indicated that the section needed more detail about professional development taking place at the local level in addition to the SEA level.  |
| <i>Strengths</i>   | The reviewers found strengths in the plan including training and professional development opportunities for local liaisons including homeless education booths at conferences, webinars, information briefs, and one-on-one technical assistance during monitoring. The HOPE-VA trainings were provided for all liaisons, and participation was tracked by the Office of the State Coordinator. Reviewers also noted that a variety of homeless information briefs, training materials, and other resources have been developed with various audiences in mind, including teachers, special education staff, school social workers, enrollment staff, school nurses, administrators, school counselors, and school psychologists. |
| <i>Limitations</i>   | Peer reviewers noted that more detail was needed on how the local professional development targeted for specific groups (administrators, counselors, and transportation staff) will be carried out and documented. It was also noted that the plan did not discuss what role the liaisons have for local professional development and how they will be supported in carrying out that role.   |
| <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>   |
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| <i>Peer Analysis</i>   | The peer reviewers observed that the plan emphasized collaborative activities to inform and provide training to the multiple constituencies involved in identifying and serving homeless preschool children. The SEA described the State Coordinator’s participation on numerous early childhood boards and committees, collaborations, and other early childhood activities, and that effective practices are disseminated and local procedures are reviewed during monitoring, including information on reserving slots in early childhood programs.   |
| <i>Strengths</i>   | Peer reviewers identified strengths in the plan including that the State Coordinator is actively engaged with others by participating on numerous early childhood boards and stakeholder committees, collaborating with the Head Start Collaboration Coordinator and other partners, addressing homeless students in the Virginia Preschool Initiative Plus grant, posting information briefs on the HOPE website, developing and distributing a Parent Pack, and planning for other upcoming activities and best practices pertaining to homeless preschool children. Reviewers also noted that the LEA-administered preschool programs were also reviewed during monitoring to ensure coordination was occurring and Head Start regulations address homeless children. |
| <i>Limitations</i>   | Peer reviewers observed that the SEA’s narrative did not address specifically the SEA or LEA procedures for application, enrollment, prioritization, or transportation of homeless children in State or LEA-administered preschool programs. The plan would be strengthened if the ensured that the slots, training, and referrals are being done.   |
| <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>   |
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| <i>Peer Analysis</i>                      | The peer reviewers observed that the plan included data and outcomes on graduation, Single Points of Contact at colleges (SPOCs), and targeting older youth. In addition, the SEA used multiple strategies to ensure that homeless youth are identified and provided equal access to secondary education and support services; however, it did not describe specifically how youth separated from public school are identified and enrolled. The narrative also indicated several areas where activity is planned to increase opportunities for homeless youth. Reviewers also observed that the plan did not provide a discussion of how monitoring will examine local procedures for identification and access to services.  |
| <i>Strengths</i>                          | Reviewers noted the inclusion of data analysis of barriers and educational outcomes. Also noted was that the SEA has established a flag in the student information system to identify and capture unaccompanied homeless youth, and to disaggregate its on-time graduation rate for homeless students. The State Coordinator is a member of the Governor’s Interagency Partnership to Prevent and End Youth Homelessness and many activities have been implemented for this initiative, including a GEAR UP grant targeting homeless high school seniors, a Higher Education Network and SPOCs, and expanded legislation pertaining to flexibility on seat time requirements (addresses credit accrual challenges). Additionally, reviewers observed that credentialing programs and online courses will be identified, and that the plan also identified outreach strategies to improve identification of homeless youth. |
| <i>Limitations</i>                        | Peer reviewers noted limitations, including that while the State has legislation granting flexibility in requirements, the plan did not discuss the extent to which districts are using this to decrease barriers. The plan also did not discuss the role of monitoring to ensure appropriate outreach to unaccompanied homeless youth and local policies/procedures regarding credit accrual or recovery, and the SEA did not address specifically how youth separated from public school are identified and enrolled. Peer reviewers also noted that the SEA did not describe the specific procedures it uses to ensure that homeless youth and youth separated from public schools are identified and afforded equal access to appropriate secondary education and support services.  |
| <i>Did the SEA meet all requirements?</i> | <input checked="" type="checkbox"/> Yes (1) Reviewer   |

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|  | <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 the plan would be strengthened if the SEA included copies of or links to the specific procedures it uses to ensure that homeless youth and youth separated from public schools are identified and afforded equal access to appropriate secondary education and support services, and if procedures do not exist at the SEA, then the SEA should address how such procedures will be developed. The peer reviewers indicated that the plan would also be strengthened if the State discussed how monitoring will ensure that outreach to unaccompanied homeless youth and local policies and procedures regarding credit are appropriate and effective. |

- **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>  |
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| <i>Peer Analysis</i>  | Reviewers observed that the SEA described a plan to collaborate with the high school league and encourage summer school and extracurricular activities. It was also observed that State Coordinators provide training and assistance to liaisons and States that monitoring is being revised to address the topic, the SEA generally described activities that pertain to removing barriers to access extracurricular activities, specialized programs, summer programming, charter schools, magnet schools, career and technical education, advanced placement, and online learning. Peer reviewers also noted that the SEA did not describe specific procedures that specifically address how the SEA will ensure that homeless children and youth do not face barriers to accessing academic and extracurricular activities. |
| <i>Strengths</i>  | Peer reviewers identified strengths in the plan including that the SEA has a long-term relationship with the High School League and was involved in working with them to modify regulations to prevent homelessness from being a barrier to participation in sports. Also noted was the State Coordinator’s involvement with the Virginia Tiered Systems of Support Research and Implementation Center has potential for ensuring that needs and barriers of homeless students are included in data analysis and intervention planning. Peer reviewers also observed that local liaison training addresses access to specialized programs, and the monitoring protocol will be revised to address access issues.  |
| <i>Limitations</i>  | The reviewers noted that the SEA generally described activities to help remove barriers homeless children and youth might face to accessing academic and extracurricular activities; however, with the exception of charter schools, the plan did not discuss current or proposed policies addressing the programs listed in the requirement, or specific procedures to be followed to ensure access and participation.   |
| <i>Did the SEA meet all requirements?</i>   | <input checked="" type="checkbox"/> Yes (1) Reviewer<br><input checked="" type="checkbox"/> No (2) Reviewers  |
| <i>If no, describe the specific information or clarification that an SEA must provide</i> | Peer reviewers indicated that the plan could be strengthened with more specific discussion of current policies and procedures for ensuring access to 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. The plan would be strengthened if the SEA described procedures that specifically   |

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| <i>to fully meet this requirement</i> | address the assurance that homeless children and youth do not face barriers to accessing academic and extracurricular activities. |
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**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>  |
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| <i>Peer Analysis</i>   | The reviewers observed that the State plan included several State codes to reduce the barrier of lack of documentation, and provided a summary of and link to the Code of Virginia references pertaining to birth certificates, immunization, health, and residency records and requirements that remove enrollment delays for homeless children and youth. It was also noted that the SEA described strategies to address other problems with respect to the education of homeless children and youth that included the provision of training and conference presentations, information briefs, brochures, posters, the Liaison Toolkit, the National Center for Homeless Education’s Parent Packs; monitoring, the dispute resolution process, and collaboration with Title I, Part A and Student Services personnel. |
| <i>Strengths</i>   | Peer reviewers identified strengths in the plan including that the SEA tracks the number of disputes or concerns about enrollment, and provided pertinent legal references and links to the causes of enrollment delays listed in the requirement. It was also noted that the State Coordinator collaborated with the Student Services school nurse coordinator regarding immunization and other health records and immediate enrollment issues are discussed during monitoring.  |
| <i>Limitations</i>   | Reviewers noted that although the SEA described the Caregiver’s Affidavit in the Liaison Toolkit, an expanded discussion on strategies to address guardianship issues, more description of procedures for transferring school records, and including training with other staff and enrollment clerks would strengthen the plan.   |
| <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>   |
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| <i>Peer Analysis</i>  | Peer reviewers observed that the SEA tracks the reduction in complaints and developed a way to track mobility. However, the SEA and LEAs did not demonstrate that policies to remove barriers to the identification of homeless children and youth, and the enrollment and retention of those youth in school, were developed, reviewed, and revised.  |
| <i>Strengths</i>  | The SEA developed a new eligibility dispute resolution process, referenced in item 2, which streamlined the process. The State code also contains relevant provisions to remove barriers. The State School Boards Association disseminates a sample Homeless Education Policy to LEAs. The State Coordinator tracks patterns of barriers for possible attention. Policy changes have been initiated for compliance with ESSA and LEA monitoring examines local policies and procedures. The State Coordinator is collaborating with pertinent agencies on attendance issues and presenting at conferences.   |
| <i>Limitations</i>  | Throughout the plan, the SEA described many activities as they pertained to identification, enrollment, needs assessment, training and professional development, and access to services (including preschool). However, established procedures and policies were not included in or linked to the plan. The plan also did not describe a process to review State policies. The State plan did not include a discussion of support provided to LEAs and stakeholders when monitoring identifies local policies in need of updating/revision, and although fees and fines are not considered a barrier in practice, there should be a discussion of existing policies addressing this issue. |
| <i>Did the SEA meet all requirements?</i>                             | <input checked="" type="checkbox"/> Yes (2) Reviewers<br><input checked="" type="checkbox"/> No (1) Reviewer   |
| <i>If no, describe the specific information or clarification that</i> | Reviewers indicated that the plan would be strengthened if the SEA provides a description of a more targeted process for reviewing and updating policies, and clarifies how it ensures that policies described are developed, reviewed, and revised at both the SEA and LEA levels. If policies do not exist at the  |

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| <i>an SEA must provide to fully meet this requirement</i> | SEA or LEA levels, then the SEA should address how such policies will be developed. |
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**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>   |
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| <i>Peer Analysis</i>   | Peer reviewers observed that the SEA described ways in which the State Coordinator will assist liaisons and counselors in advising homeless youth and preparing and improving their readiness for college, including seeking scholarships. Collaborations provide information and training to assist counselors and higher education contacts in providing the needed support to students. However, it was noted that the narrative would benefit from additional detail describing how homeless youth will receive assistance from counselors.  |
| <i>Strengths</i>   | Peer reviewers identified strengths in the plan including where the SEA described activities provided by the State Coordinator to support liaisons and counselors in assisting and advising homeless youth and preparing and improving their readiness for college. These activities included training, professional development, awareness opportunities, tools, collaboration, and provision of a standardized template to verify student status for FAFSA. Also noted were initiatives to improve homeless youth access to higher education including a GEAR UP grant targeting homeless high school seniors and the Higher Education Network and Single Points of Contacts (SPOCs) at colleges and universities. |
| <i>Limitations</i>   | Peer reviewers noted that the plan did not clearly describe how counselors will assist and advise homeless youth and prepare and improve their readiness for college. It was also observed that the plan did not indicate if data related to readiness for college or access to financial aid were examined in the State needs assessment.   |
| <i>Did the SEA meet all requirements?</i>  | <input checked="" type="checkbox"/> Yes (1) Reviewer<br><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 the plan would be strengthened if the SEA described how counselors will assist and advise homeless youth and prepare and improve their readiness for college. The plan should also provide more detail about expectations for how counselors will receive the training they need and how their participation will be verified.   |