

STATE PLAN

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

State Name: Vermont



U.S. Department of Education

June 30, 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 generally agreed the requirement was met and observed that the SEA identified several strategies for homeless children and youth to be identified allowing for redundancy to reduce under-identification.
<i>Strengths</i>	The peer review panel noted that the SEA’s list of identification strategies were specific and appropriate, as well as the identification and assessment of homeless children and youth’s needs were both clearly addressed. Several key sources were listed for identification, and the SEA referenced trainings that were available to assist LEAs as well. Additionally, various stakeholders were addressed in detail to support the identification of homeless children and youth.
<i>Limitations</i>	The peer review panel observed the SEA was unclear in the methods for assuring that activities took place at the local level. Also, there was no reference to how the SEA assured identification strategies and needs assessments were occurring at the local level. The SEA did not mention a Statewide data system for tracking identified homeless children and youth. The peer review panel recommended that the plan would benefit from a more detailed explanation of the deliverables and strategies provided by the SEA to assure the activities outlined in this section occurred at the local level. An explanation of the SEA’s monitoring process would strengthen this portion. Furthermore, a description of how data were captured and tracked and how it was addressed through monitoring would enhance this section of the plan.
<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.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 plan clearly described a Statewide local dispute resolution process and a State level process with specific timelines. The dispute process had established procedures for processing disputes at the SEA level, and from a statutory standpoint, the procedure was compliant. However, from a review of the process in Appendix E, the process indicated a lengthy period of time between the receipt of a dispute to the State and the determined outcome.
<i>Strengths</i>	The peer review panel noted that the plan provided a thorough understanding of the requirements for a prompt resolution of disputes, and Appendix E further detailed the various steps in the process along with a clear timeline for implementation. A Statewide local dispute resolution process was mentioned that assisted with increased consistency and understanding and liaisons were trained in the process. The plan clearly referenced the distribution of this information to parents, guardians, and unaccompanied youth to help assist them in understanding their rights under the McKinney-Vento Act. Also, enrollment during a dispute was explicitly stated.
<i>Limitations</i>	The peer review panel observed that since the Federal statute referenced “prompt resolution” the State did meet this requirement, however, the appeal process outlined in Appendix E stated that a recommendation and final decision was issued in 30 business days. The panel noted many unintended consequences that could result from such a lengthy process, including inadvertently causing stress on homeless children and youth when the outcome of the appeal may force them to attend a different school from the one in which they were seeking enrollment since they may have potentially formed strong relationships during that time frame. Additionally, the plan did not include how the SEA assured LEAs comply with this requirement by outlining such items as the monitoring indicators. Also, what could be appealed through the dispute process was not identified. The peer review panel recommended that the term “State Director” be clarified, and that the SEA should consider allowing a verbal appeal at the State level for families/youth with limited literacy skills.
<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 the plan focused heavily on technical assistance rather than heightening awareness. The technical assistance provided by the State was comprehensive and assured compliance, and the State offered a portion of this technical assistance based on the identified needs of the homeless liaisons, which suggested that the State had strong responsiveness to the needs of the field. Liaisons were expected to train other staff, but which staff would be targeted or how liaisons would fulfill this responsibility was not described. The plan did mention that liaisons had the resources they needed to do so but did not elaborate further.
<i>Strengths</i>	The plan did describe unique activities to heighten awareness and address needs through Title I. The use of NCHE resources to help liaisons provide training was appropriate, and liaisons trainings were offered at least annually. Additionally, the State suggested that it had a full implementation cycle for the provision of Every Student Succeeds Act by its reference to the SEA notification of LEAs on the requirement to train school staff. Also, there was a process for technical assistance to the field from the Office of the State Coordinator. Lastly, this portion of the plan specifically referenced technical assistance.
<i>Limitations</i>	The peer review panel noted the plan did not address any sort of accountability to ensure that the school personnel, as mentioned in the question, received such awareness activities. Also, there was no significant reference to support technical assistance and provide resources to LEAs nor was it clear if the training offered to liaisons was mandatory or optional. Also, no other staff -- beyond local liaisons -- were noted in the plan as being trained. Furthermore, if Title I coordinators had access to training regarding the homeless education reservation for the specific needs of homeless children and youth, this information should have been included more clearly in the plan. Also, NCHE does not have an annual conference. This should be changed to National Association for the Education of Homeless Children and Youth (NAEHCY).
<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.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 the State clearly provided access to preschool for homeless children by offering a universal preschool for all 3 and 4 year olds and even 5 year olds not yet enrolled in kindergarten. The plan mentioned that the homeless liaison served preschool students in the same way that they served students enrolled in K-12.
<i>Strengths</i>	The peer review panel noted that with universal preschool, immediate enrollment was possible, which exceeded the current mandate in the McKinney-Vento Act. The SEA referenced a plan to provide technical assistance on the unique needs of preschoolers in the future in order to bring awareness to this population. Also, the State presented the same procedures for identification, enrollment, and access for preschoolers as they did for their other K-12 homeless students.
<i>Limitations</i>	The peer review panel observed the SEA did not address specifics regarding services to preschoolers who were homeless. Also, there was no description of processes for outreach to families with preschoolers to ensure their identification and enrollment. Furthermore, there was no description of data collected or monitoring done to ensure implementation of the State policies.
<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>	

- **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 review panel observed that Vermont’s proficiency-based system for graduation assisted in removing the credit-accrual barrier for students experiencing homelessness. Vermont was in a unique place to allow districts to award diplomas for students based on proficiency assuring that barriers from credit accrual and coursework were removed. The plan also described a comprehensive list of partners to reach out-of-school youth.
<i>Strengths</i>	The peer review panel noted how Title I set-aside funds, as well as other partnerships, were mentioned to remove barriers for secondary homeless students. The description of partners to identify youth separated from schools at the State and local levels was comprehensive. Also, the move to a proficiency model rather than Carnegie credits removed a major credit accrual barrier. This system allowed students to demonstrate mastery for graduation instead of seat-time, and this policy was noted by the reviewers to have significant positive implications for homeless youth. Highly mobile populations would be allowed to transfer to districts without the barrier of credit accrual.
<i>Limitations</i>	The peer review panel observed that the SEA provided insufficient details regarding how students were identified and how proficiencies were evaluated and demonstrated. Also, beyond credit accrual, the plan did not provide a description of barriers to be addressed or how the elements of this requirement would be ensured (e.g., monitoring and tracking graduation rates). The peer review panel recommended that an example of how full or partial credit was evaluated and a description of how students demonstrate proficiency leading to graduation would strengthen the plan. Also, it was thought that a clear description of how homeless liaisons were provided technical assistance in understanding and implementing the proficiency-based model would be helpful since it appeared to be complex and unique.
<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>	

- **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 focused the responsibility of access on the locality. Although several programs were referenced, the academic programs and extracurricular activities included in the question were not specifically addressed in the response.
<i>Strengths</i>	The peer review panel noted coordination with Title I, the 21 st Century Learning Centers Program, and local/community programs as sources of support to remove barriers. Also, financial assistance was outlined as a way to assist homeless children and youth in enrolling and participating in these programs. Student access to free meals was also mentioned in the plan.
<i>Limitations</i>	The peer review panel observed that the plan did not specifically address each of the academic and extracurricular activities and programs listed in the question. Also, there were no specific procedures describing how the State ensured access to magnet school, summer school, career and technical education, advanced placement, online learning and charter school programs. The peer review panel recommended that monitoring procedures be included to strengthen the plan.
<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 reviewers suggested that the plan would be strengthened if it would describe SEA procedures that ensure access to the listed activities. This could include state-level coordination, joint trainings, state policies and sample local policies, and inclusion of this topic in SEA monitoring of LEAs. Also, the peer reviewers recommended that the plan address the accessing barriers programs mentioned in the question such as magnet schools, summer schools, career and technical education, advanced placement, online learning, or charter school programs, as well as list which activities or programs are available in the State.

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>	Two peer reviewers observed that the plan provided appropriate coordination with a variety of stakeholders to address enrollment delays, as mentioned in the question, and also thoroughly addressed the availability of SEA technical assistance opportunities. However, the plan did not specify detailed strategies for each clause of delay listed in the requirement. One peer reviewer observed that this portion of the application provided further information in Section F: Policies to Remove Barriers, and that the uniform requirements were addressed on page 101 in Section D: Access to Services. However, the plan was unclear on its actual strategies to address these issues.
<i>Strengths</i>	The peer review panel noted that the liaisons and/or school social worker assisted families in obtaining needed documents after students were enrolled, and that the plan indicated the SEA did have a policy in place for immediate enrollment. One peer reviewer noted that the application clearly outlined the strategies the SEA used to address each of these issues throughout different portions of the plan.
<i>Limitations</i>	The plan did not indicate if LEAs used the policy for immediate enrollment, and if they were required to use this policy, or if the policy was monitored. In addition, the plan lacked specifics on the various issues with enrollment in the requirement. The peer review panel recommended that the SEA describe clearer implementation strategies or identify which specific supports were in place to address the issues beyond statute to strengthen the plan. Also, it was recommended that a more detailed description or actual language of State laws would provide need clarity. The supports might include a description of the trainings or technical assistance, how the SEA monitored LEAs, or how the SEA collaborated at the State level to assist in providing strategies to the points i-v listed in the question.
<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 reviewers suggested that the plan would be strengthened if it would address each barrier and/or describe data the State uses to support that these barriers do not exist for enrollment delays. This may be a description of technical assistance, trainings, collaborations, assurances, policy review or monitoring. Also, it would be beneficial to include the actual State statute related to these requirements to fully understand how the SEA utilizes these as a strategy to remove these barriers.

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 the SEA addressed strategies and practices to barriers in the identification, enrollment and retention of homeless children and youth in this section as well as other sections throughout the plan. The SEA did not, however, address how the policies were reviewed or revised at any level nor did the SEA mention the removal of barriers due to outstanding fees or fines, or absences.
<i>Strengths</i>	The peer review panel noted that the SEA included a process to ensure the identification of homeless children and youth. Also, the SEA had clear procedures and strategies for LEAs in the identification, enrollment, and retention of homeless children and youth.
<i>Limitations</i>	<p>The peer review panel saw that there was no reference to policies being developed, reviewed, and/or revised nor was there any reference to outstanding fees, fines, or absences in the plan.</p> <p>The peer review panel recommended that it would be helpful to provide more detail in the plan to determine if the LEA had worked with other departments or agencies to develop the suggested policies, if the state statute existed, what the monitoring checks for compliance for these policies were, and if there was technical assistance to the LEAs on this requirement. Also, more reference to the actual policies was noted as necessary to fully meet this requirement.</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>	The SEA must address the term “policies” and describe how the SEA and the LEAs develop, review and revise such policies in removing barriers. Additionally, the SEA needs to provide evidence that the SEA as well as the LEAs have policies in place that address removing barriers to the identification, enrollment, and retention of homeless children and youth in schools, as well as include the removal of barriers due to outstanding fees or fines, or absences. The SEA needs to describe how the State monitors LEAs’ processes for review and revision of such 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>	The peer review panel observed that the plan described that youth would work with school counselors and were included in college readiness program, when possible. However, the plan did not reference how school counselors were trained to work with homeless youth, how unaccompanied homeless youth would be informed of their independent status on the FAFSA, how liaisons support school counselors, or how these youth would be included in statewide initiatives to improve college readiness.
<i>Strengths</i>	The peer review panel noted that the plan referenced two specific programs available for college readiness- GEAR UP and Talent Search.
<i>Limitations</i>	The peer review panel noted that the SEA did not include description of how school counselors were trained to work with homeless youth, how unaccompanied homeless youth would be informed of their independent status on the FAFSA, how liaisons support school counselors, or how these youth would be included in Statewide initiatives to improve college readiness. Presumably there were several existing supports in place for all students in Vermont to assist in college readiness, so inclusion of these would be beneficial in demonstrating how the State assisted all students, including those experiencing homelessness, in receiving assistance. The peer review panel recommended that the SEA outline how the State checked for compliance during the monitoring process for the provisions of the ESSA. A description of the technical assistance trainings provided to counselors, or perhaps to the homeless liaisons, regarding this provision, would enhance the plan in meeting this requirement.
<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 reviewers suggested that the plan would be strengthened if it would describe how school counselors are trained to work with homeless youth, how unaccompanied homeless youth are informed of their independent status on the FAFSA, how liaisons support school counselors, and how these youth are included in statewide initiatives to improve college readiness. Also, the peer reviewers suggested a more detailed description of GEAR-UP and Talent Search, as well as how homeless youth would receive assistance from counselors. The peer reviewers recommended that the plan clarify specific measures which are currently in place throughout the state, and describe future activities to assure youth experiencing homelessness receive assistance to improve college readiness.