

STATE PLAN  
Peer Review Composite Notes  
for the McKinney-Vento EHCY Program

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State Name: Wisconsin



**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 provided specific examples of the SEA procedures utilized in identification and their role as a guidance and technical assistance provider. The plan states the role and expectation of the LEA in identifying homeless students and offers a list of supports provided by WDPI to support liaisons in identifying and assessing the needs of students experiencing homelessness. However, the plan did not describe how this information is collected or verified or how the State reviews and analyzes data to track progress or inform further actions.
<i>Strengths</i>	The peer reviewers observed strengths in the State plan including that it clearly outlined the role of the local liaison as the sole identifier of homeless students and explicitly states the role of the SEA, which includes providing templates to assist with identification and offering a variety of trainings, such as web-based modules and webinars, and incorporating feedback for continuous improvement.
<i>Limitations</i>	The limitations noted by the peer reviewers included that the SEA did not provide a description of how data are captured or tracked, addressed through monitoring, or used to determine the reasonableness of the identification done at the State and local level. This section would be strengthened by a description of the types of collaborations the SEA engages in to assist in the identification of homeless children and youth. This may include collaboration across departments, agencies, or with service providers.
<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.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 reviewers observed that the SEA’s response to this requirement provided limited information about the process beyond monitoring localities for the existence of LEA policies consistent with McKinney-Vento. Reviewers noted that the plan did not include information specifically regarding homeless children, or a description of timelines.
<i>Strengths</i>	The peer reviewers noted that the plan referenced eligibility and placement disputes. The State monitors LEAs to ensure that a local dispute process consistent with McKinney-Vento is in place, and a State-level appeal process is included in Administrative Code. The plan also ensured that the SEA can verify the written communication of parent and student rights within the dispute resolution process.
<i>Limitations</i>	The peer reviewers found that the plan did not address how the State monitors actual disputes, or what is considered to be a prompt resolution. Additionally, the plan did not describe the dispute processes included in training or technical assistance to LEAs, or include timelines for processes or protocols to ensure that disputes are dealt with in a timely manner.
<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 reviewer observations included that the plan description focused on accessible web-based content provided by the State to reach staff, but without description of outreach to ensure the school personnel receive training or a description of monitoring for compliance. Reviewers stated that the description provided specific examples of how the SEA works to build capacity in both liaisons and other school personnel in the LEAs and that the SEA provides ongoing technical assistance, online resources and professional development to heighten awareness of varying levels of education staff.
<i>Strengths</i>	The peer reviewers noted that the State has an online repository of targeted information for use by LEAs including the State’s website, training videos, examples of policies and procedures, and an animated video.
<i>Limitations</i>	The reviewers noted limitations in the plan, including that there wasn’t a description of how the State will monitor compliance to ensure liaisons participate in required training, or how the State plans to provide or ensure local staff training, or provide professional development beyond the provision of the modules. The plan also did not provide detail on specific efforts to reach targeted audiences or assessing needs, including runaway youth. It was unclear to the reviewers if the SEA supports these activities by State-level collaborations and activities such as conferences.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (2) Reviewers <input checked="" type="checkbox"/> No (1) Reviewer
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	It was indicated that in order to strengthen the plan, the State should describe in greater detail how the variety of education audiences will be reached and how training will be tracked and monitored.

**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>	Reviewers observed that the SEA monitors LEAs to ensure that homeless children have access to preschool and support services and help to eliminate barriers. However, the plan did not provide a description of procedures to ensure access to public preschool programs.
<i>Strengths</i>	The reviewers noted strengths such as the provision of school of origin transportation to public preschool programs, annual monitoring for selected LEAs, and stakeholder feedback sessions that further professional development and technical assistance.
<i>Limitations</i>	Reviewers found limitations including that the plan did not provide a description of procedures or of collaboration with early childhood education providers at the State or local levels. It was also noted that the plan did not clearly demonstrate how the expectation of accessibility to preschool is practically applied by LEAs or provide a full description of the monitoring process.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> No (3) Reviewers
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The peer reviewers indicated that the State plan would be strengthened by a fuller description of how the SEA assures access to public preschool which may consist of details surrounding collaborations (including Head Start programs), what information is collected during monitoring to ensure access, and more specific information on the monitoring cycle to ensure all districts are in compliance. It was also suggested that the plan should clarify transportation for students experiencing homelessness. Reviewers also suggested the State collect and track baseline data on access to demonstrate progress or signal concerns, and that the State compares statewide data on the number of homeless students in pre-k programs with the overall number of pre-k homeless students.

- **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 plan mentions listening sessions but did not describe how these ensure identification and access. Also, the SEA monitors LEAs to ensure that homeless children have access to secondary education and support services and to help LEAs eliminate barriers.
<i>Strengths</i>	The peer reviewers noted strengths including using stakeholder feedback to strengthen technical assistance and conducting LEA monitoring for policies and procedures to ensure appropriate credit is included.
<i>Limitations</i>	Peer reviewers agreed that the main limitation was that the response to this requirement did not provide much detail.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> No (3) Reviewers
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The peer reviewers indicated that the State plan would be strengthened by describing the procedure it uses to ensure access for homeless youth and youth separated from school, how access will be monitored, and what efforts address credit accrual. They recommended that baseline data on access be collected and tracked to demonstrate progress or signal concerns that should be addressed at the State level.

- **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 SEA plan describes how the expects that LEAs will not create or maintain barriers to accessing academic and extracurricular activities for homeless students and will ensure this by monitoring LEAs and providing technical assistance, but did not describe procedures to ensure this occurs.
<i>Strengths</i>	The reviewers noted strengths in the plan, including that the plan described specific information regarding the removal of transportation as a barrier to accessing these activities in the requirement. Also, the SEA described stakeholder feedback sessions that have helped further their professional development and technical assistance.
<i>Limitations</i>	The peer reviewers stated that limitations in the plan included the limited description of how monitoring acts as a procedure for this requirement.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> No (3) Reviewers
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The peer reviewers indicated that the State plan would be strengthened by describing specific procedures and/or a more robust explanation of the monitoring processes to ensure homeless children and youth do not face barriers to accessing academic and extracurricular activities. They recommended that baseline data on access be collected and tracked to demonstrate progress or signal concerns that should be addressed at the State level.

**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 reviewers noted that the State provided training to address barriers, and that it monitors its LEAs. While the State’s document systems address some barriers to enrollment delays, several are not addressed, and it is unclear which enrollment delays are specifically addressed by the strategies included in the description provided in the plan. The SEA provides immunization accuracy and ways to ensure that Wisconsin student records are available through their WISEdata, but the plan did not provide strategies regarding how students from other States may be supported regarding immunizations.
<i>Strengths</i>	The peer reviewers observed strengths in the plan, including that the State provided training to address enrollment barriers and monitors LEAs for dispute policies and procedures. The WISEdata system provides statewide support to ensure students do not experience enrollment delays due to school records.
<i>Limitations</i>	The peer reviewers noted limitations including that the plan did not reference other health records, residency requirements, birth certificates, guardianship, or uniform or dress code requirements. It was also observed that the plan did not describe how to support students coming from other States, those who have no immunization records, students who are unaccompanied, or those who need assistance meeting dress code or uniform requirements.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> No (3) Reviewers
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The peer reviewers indicated that the State plan would be strengthened by addressing all the barriers noted in the requirement and providing strategies for assisting students coming from other States and those who have no documentation.

**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 reviewers noted that the State demonstrated its attention to stakeholder feedback about professional development and training. The peer reviewers also observed that the SEA plan provided sample policies and procedures and monitors LEAs for policy review, but did not reference the State reviewing and revising its policies.
<i>Strengths</i>	The peer reviewers observed that the plan specifically addressed the areas of identification, enrollment, and retention of homeless children and youth (including information on policies and procedures), and the dispute resolution process regarding the removal of barriers.
<i>Limitations</i>	Peer reviewers noted limitations including that the narrative did not demonstrate that the SEA or LEA have developed ways to review policies and procedures to address removing barriers, and that the plan did not describe how the listening sessions have enhanced technical assistance, or how the State reviews and revises its policies.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> No (3) Reviewers
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	The peer reviewers indicated that the State plan would be strengthened by demonstrating that the SEA has developed and reviews and revises policies to remove barriers related to outstanding fees, fines, and absences. Reviewers also suggested listing potential barriers and their expected outcomes and resolutions to help LEAs address the removal of barriers consistent with SEA expectations.

**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 monitors local liaisons to help ensure that all counselors are trained on the statutory requirement for providing assistance, but the plan did not describe how youth will receive assistance from counselors.
<i>Strengths</i>	The peer reviewers identified strengths in the plan, including that all LEA staff receive training on advising youths experiencing homelessness on college readiness and that LEA monitoring will include ensuring liaisons inform counselors on advising youth.
<i>Limitations</i>	The reviewers noted limitations including that the plan did not describe how youth will receive assistance. It was also noted that the plan did not mention SEA documentation requirements or expectations of the SEA in the monitoring process in relation to counselor trainings. Reviewers also observed that the plan did not describe SEA-level collaboration, statewide student-specific graduation plan requirements, or type of supports provided by counselors that are specific to the needs of youths experiencing homelessness.
<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 the State plan would be strengthened by describing how assistance will be provided to youths experiencing homelessness, and how the State will monitor and track that assistance is provided. It was also noted that the plan should describe the SEA’s expectations of counselors, including addressing youths social-emotional needs, academic proper placing and follow-up, FAFSA completion, ACT/SAT fee waivers, and contacting post-secondary institutions when necessary to help ensure the smooth transition into post-secondary education.