

STATE PLAN

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

State Name: West 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>
<i>Peer Analysis</i>	Peer reviewers noted the SEA provided a specific reference to West Virginia code that designated attendance directors as the local liaisons, and that the plan described strategies the SEA uses to support the identification of homeless youth such as training, provision of resource materials, professional development for school staff, enrollment processes, data collection and tracking, and dissemination of guidance documents on types of educational services. In addition to information related to identification, the SEA described how it assessed the needs of homeless children and youth using various methods. The assessment included a determination of needs during monitoring, annual review of Title I, Part A homeless set aside funds, and use of data collected by various State agencies and the State’s Homeless Coalition. However, it was also noted that the plan did not describe needs assessment once homeless students are identified and did not describe specific activities, outreach activities, or specific procedures.
<i>Strengths</i>	The peer reviewers identified strengths in the plan including that the SEA provided professional development to school staff, included questions on its school enrollment form to determine eligibility for homeless services as part of the enrollment process, distributed homeless education brochures to students and families, included a homeless identifier in its Education Information System, and tracked homeless student educational progress. Annual monitoring examines local strategies for identification, and how well subgrantees are meeting student needs. It was also noted that the State Coordinator utilizes data collected by several agencies to determine potential needs.
<i>Limitations</i>	Although the SEA described activities that provided opportunities for discussion of needs, it did not describe a specific State-level comprehensive needs assessment process to determine statewide needs of homeless children and youth. More description of the training and resources to assist with identification was also noted. Peer reviewers also observed that the plan mentioned coordination of activities with other entities and agencies but was not specific, and that information about guidance documents was provided but did not ensure outreach or information.

<i>Did the SEA meet all requirements?</i>	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 found that the narrative described the best interest determination process at the local level, but the description of the dispute resolution process did not provide key details, such as eligibility disputes, a description of activities that ensure that disputes are tracked, or how barriers are identified.
<i>Strengths</i>	Peer reviewers observed strengths in the plan, including the summary of the dispute resolution process in the plan’s narrative section that addressed the right to dispute an LEA’s best interest determination, and provided timelines. The State also has Joint Guidance issued by WVDE and WVHHR that addresses homeless children. The narrative also provided a description of the best interest determination process at the local level and a general description of the dispute resolution process.
<i>Limitations</i>	The peer reviewers noted that the dispute resolution process did not provide information on eligibility disputes, and it was unclear whether the State’s dispute resolution process is part of the Joint Guidance. The plan also did not discuss resources available to liaisons (such as sample forms and letters) or how often liaisons receive training and updates on dispute resolution, or how families and youth access the dispute resolution resources.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1) Reviewer <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>	Reviewers noted that the plan could be strengthened by providing sample forms and additional information regarding the dispute resolution process, including when parents receive information on their right to dispute; assurances that communications will use language understandable by the recipients; sample forms and letters; and how liaisons will receive refresher trainings and updates on the process.

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 reviewers observed that in response to this requirement, the SEA described activities used to heighten the awareness of school personnel of the specific needs of homeless children and youth, and mentioned training and support, but did not provide detail about how training and support of liaisons and local school personnel will be carried out or describe specific outreach activities.
<i>Strengths</i>	The peer reviewers identified strengths in the plan where the SEA, through its monitoring process, requires LEAs to produce evidence that professional development had been offered for counselors, service personnel, and other certified personnel who identify and serve homeless children and youth, including runaway and homeless youth. Additionally, liaisons are required to provide evidence that they assisted unaccompanied youth in placement or enrollment decisions. The State Coordinator also informs school personnel and others of the services and resources available.
<i>Limitations</i>	Reviewers noted that the State’s plan described activities it used to heighten awareness and states that liaisons receive training, but did not describe the training given or how it occurs, such as timing, format, or attendance tracking. Local professional development targeted at specific groups is important, but the plan did not discuss how liaisons will be supported to do this, if the State provides resource materials for the local professional development, or if support materials for particular audiences (such as National Center for Homeless Education briefs) are made available in addition to the local training events. The plan did not cite data used to prioritize particular audiences for participation or to prioritize particular topics to emphasize in the training. The plan would be strengthened if it included a list of specific groups, stakeholders and meetings in which the information is shared.
<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</i>	The plan would be strengthened if the SEA described additional programs designed specifically for LEA liaisons and other school personnel to heighten their awareness of the specific needs of homeless children and youth, including runaway and homeless youth. Additionally, the plan should provide details about how liaison training will be made available and how participation will be documented. The plan should describe more fully the resources available, particularly those tailored to various role

<i>requirement</i>	groups, and how they will be disseminated, as well as how liaisons will be supported to provide appropriate professional development to local personnel.
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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 reviewers observed that the plan narrative for this section described approaches to ensuring preschool access, but did not describe specific procedures. The SEA summarized the <u>West Virginia Board of Education Policy 4110: Attendance</u> (Section 5.3.b.10.H.) requirement to ensure homeless children and youth receive educational services for which they are eligible, including Head Start and Even Start programs, and LEA-administered preschool programs. However, it did not address the SEA or LEA procedures specifically that ensure homeless children have access to eligible public preschool programs, and it was difficult to distinguish how the SEA is targeting public preschool programs.
<i>Strengths</i>	The peer reviewers identified strengths in the plan, including that the SEA articulated this requirement to LEA liaisons through various forms of documented guidance and technical assistance. The board of education policy was also noted as a strength, as State policy ensures access to Head Start, Even Start, and LEA preschool programs.
<i>Limitations</i>	It was noted that the plan narrative did not specifically address the SEA or LEA procedures for application, enrollment, prioritization, or transportation of homeless children in State or LEA-administered preschool programs. Other than the attendance law, additional supporting activities around preschool programs were not described. It was also noted that the State plan did not discuss identification activities that are expected of all LEAs, the types of local collaborations expected or encouraged, or whether preschool access is reviewed during monitoring.
<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 plan would be strengthened if the SEA provided a link to the application and enrollment processes that address the requirement. In addition, specific information about preschool should be included on how homeless preschool children are identified and prioritized, have access to and enroll in public preschool programs, are provided services, have access to transportation, how parents are informed of the enrollment process, and how class space or slots are held for these students. More information should be provided on resources and activities that LEAs are expected to use to identify eligible preschool-age children, and if collaboration with local agencies and service providers is expected, the plan should describe what should occur and how this issue will be examined during LEA monitoring.

- **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 SEA plan described policies, but noted the need for more specific information. The SEA summarized the <i>West Virginia Board of Education Policy 4110: Attendance</i> (Section 5.3.b.10.G.) requirement to ensure homeless children and youth enroll in and have full and equal opportunity to succeed in school. However, the plan narrative did not specifically address the SEA or LEA procedures to ensure homeless youth and youth separated from public school are identified, served, and barriers removed. The plan stated that homeless youth are to be provided services, but did not describe policies or procedures through which the services will occur, or address credit accrual or recovery.
<i>Strengths</i>	The peer reviewers identified strengths in the plan including that the SEA requires LEAs to budget a Title I, Part A homeless set-aside amount to fund goods and services to enable homeless students to participate in academic and extracurricular activities (including band and sports).
<i>Limitations</i>	The peer reviewers noted that the State plan did not discuss outreach and identification activities for youth that are expected of all LEAs, or describe available training or resources to support such activities. The plan narrative did not specifically address the SEA or LEA procedures on removing barriers for homeless students to receive appropriate credit for full or partial coursework satisfactorily completed in a prior school. The SEA narrative also did not describe how homeless youth and youth separated from public schools are identified and served or discuss whether these issues will be examined during monitoring. In addition, while the board policy for attendance was described, the plan did not provide information on how the barriers are identified and addressed in order to remove them.
<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</i>	Reviewers noted that the plan could be strengthened by providing additional information regarding the procedures or included copies of or links to the specific procedures, such as those related to credit accrual, that are used to ensure that homeless youth and youth separated from public schools are identified and accorded equal access to appropriate secondary education and support services. If procedures do not exist at the SEA, then the SEA should address how such procedures will be

<i>requirement</i>	developed. The plan should also describe the types of outreach and identification activities for youth that are expected of all LEAs. In addition, the plan should describe available training or resources to support such activities and whether this will be examined as part of monitoring. The plan needs information on how the board policy for attendance is put into practice to identify and address barriers.
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- **Does the SEA describe procedures that ensure that homeless children and youth who meet the relevant eligibility criteria do not face barriers to accessing academic and extracurricular activities, including magnet school, summer school, career and technical education, advanced placement, online learning, and charter school programs, if such programs are available at the State and local levels?**

	<i>Peer Response</i>
<i>Peer Analysis</i>	The peer reviewers observed that the narrative in this section was general. The SEA summarized the <u>West Virginia Board of Education Policy 4110: Attendance</u> (Section 5.3.b.10.G.) requirement to ensure homeless children and youth enroll in and have full and equal opportunity to succeed in school. However, the plan narrative did not address the SEA or LEA procedures to ensure eligible homeless children and youth do not face barriers to accessing academic and extracurricular activities. Reviewers noted that it wasn't clear how the activities are being completed or ensured for youth, and that the plan did not discuss how current practices are reviewed.
<i>Strengths</i>	The peer reviewers identified strengths in the plan including that the State guidance and board policy are strong, requiring access to academic and extracurricular activities for homeless students. The SEA requires LEAs to budget a Title I, Part A homeless set-aside amount to fund goods and services to enable homeless students to participate in academic (such as advanced placement and virtual school classes) and extracurricular activities (including band and sports).
<i>Limitations</i>	The peer reviewers noted that the plan narrative did not specifically address the SEA or LEA procedures ensuring eligible homeless students have access to academic and extracurricular activities, including magnet school, summer school, and charter school programs. It was also noted that the plan did not describe specific policies or procedures addressing magnet school, summer school, career and technical education, or specific procedures to be followed to ensure access and participation. The peer reviewers also indicated that the plan was unclear as to whether or not the LEA monitoring examines local procedures for appropriateness.
<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</i>	The peer reviewers noted that the plan would be strengthened with more specific descriptions of current policies and procedures for ensuring access to the various academic programs listed in the requirement, as well as a description of what will be done to ensure that barriers are identified and addressed. The plan would be further strengthened if the SEA described the procedures or included copies of or links to the specific procedures it uses to ensure that eligible homeless children and youth do not face barriers to

<i>requirement</i>	accessing such programs as extracurricular activities and other educational programs. If procedures do not exist at the SEA, then the SEA should address how such procedures will be developed. The plan also needs information about who will be trained, which funds can be used, and how barriers will be monitored.
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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>
<i>Peer Analysis</i>	The peer reviewers observed that the SEA described its process for immediate enrollment of homeless children and youth and retrieval of necessary documents for immunizations and other required health records, birth certificates, school records and other documentation, and guardianship. The LEAs utilized Title I, Part A set-aside funds to purchase required uniforms or clothing to meet the dress code requirements. Also noted was that the SEA’s narrative provided a description for how each of the potential enrollment barriers is addressed by current local procedures. However, it was also observed that there may be a delay in enrollment due to obtaining some documentation or immunizations.
<i>Strengths</i>	Peer reviewers saw a strength in the plan where it described how State law provides for immediate enrollment while needed documents are obtained. The LEAs also have a process in place at the local level to address immediate enrollment and reduce enrollment delays.
<i>Limitations</i>	Peer reviewers noted that although the plan described the SEA process to address problems that may result in enrollment delays, more detailed strategies of how the SEA and LEAs handled guardianship issues and residency requirements would have strengthened 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>
<i>Peer Analysis</i>	The peer reviewers observed that the SEA summarized the <i>West Virginia Board of Education Policy 4110: Attendance</i> (Section 5.3.b.10.G.) requirement to ensure homeless children and youth enroll in and have full and equal opportunity to succeed in school, and described that the State policy was reviewed annually by the State Coordinator in consultation with the local liaisons. The peer reviewers varied in the extent to which they felt particular barriers were addressed, with some noting that fees and fines were addressed and others noting that this information only relates to attendance. It was also noted that the SEA did not demonstrate that LEAs had developed, reviewed, or revised their homeless education policies or that the SEA had a process for reviewing local policies.
<i>Strengths</i>	The peer reviewers identified strengths in the plan where the SEA described a State policy developed to remove barriers to the identification of homeless children and youth and their enrollment and retention in schools in the State, as well as full access to services. It was also noted that the State Coordinator, together with liaisons, reviews State policy and guidance annually, and also that Title I set-aside funds may be used to settle outstanding fees or fines.
<i>Limitations</i>	The peer reviewers noted that the SEA did not demonstrate clearly whether the State policy had been reviewed and revised to include new requirements pertaining to homeless children and youth or demonstrate that LEAs had developed, reviewed, and revised local policies. Policies regarding absences, and a process for reviewing and revising local policies and practices through monitoring were not demonstrated in the plan. The information provided related to attendance, but was not to all reviewers the information extended beyond attendance. Also noted was a need for a description of activities to remove barriers, and how set asides are determined.
<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</i>	The peer reviewers indicated that the plan would be strengthened if the SEA would demonstrate that the State policy has been reviewed and revised to include new requirements and that LEAs have developed, reviewed, and revised local policies. The plan should describe current State or local policies regarding removing barriers due to absences. More clarification should be given on exact activities to remove

<i>to fully meet this requirement</i>	barriers and which stakeholders will be involved. The plan should describe how monitoring (or other procedures) will review local policies impacting identification, enrollment or retention.
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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>
<i>Peer Analysis</i>	The peer reviewers observed that the SEA described specific set aside funds for college exams, and provided a summary of the types of assistance counselors will provide to all students, including homeless youths. These include college advisory and preparatory services for college applications, financial aid, college entrance exams, and scholarships. However, while the plan was specific about the kinds of information and support that homeless youth should receive from school counselors, it did not elaborate on the information and training counselors will receive to support them with their responsibilities.
<i>Strengths</i>	Peer reviewers identified strengths in the plan including that the plan described the kinds of assistance homeless students should receive from counselors. LEA monitoring includes attention to Title I set-aside funds that may be used for fees associated with exams and applications.
<i>Limitations</i>	Although the SEA mentioned that school counselors will provide homeless youth with the same assistance provided to all students, a more detailed description of how counselors specifically work with homeless youth to prepare and improve their readiness for college would have strengthened this section. The peer reviewers indicated that the plan was not clear regarding how students are identified and how counselors are trained in completing the forms and using the funds. It was also noted that monitoring will examine the provision of professional development for counselors, but did not provide a description of what that professional development will be.
<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 noted that the plan could be strengthened by providing additional information regarding professional development that will be available for counselors, including how it will be delivered, how it will address unique needs of homeless students, and how participation will be encouraged. It should also describe resources available to provide counselors with additional information and support, including standard forms or information briefs. If monitoring (or other data collection) will examine rates of application and acceptance to college by homeless students, the State should provide a description. In addition, the plan would be stronger if the State tracks rates of application and acceptance to college by homeless students.

