

# STATE PLAN

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

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State Name: Wyoming



**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>	Reviewers observed that the plan provided a description of the appropriate and achievable procedures that are used in the State for districts to identify homeless students. It was noted that the SEA will have multiple data sources to help assess the overall homeless student population in the State. Also noted was the use of locally-developed needs assessments tools for determining the services to be provided to each child or youth, and the description of the training and materials that the SEA will provide in order to support local liaisons and school district personnel.
<i>Strengths</i>	Reviewers identified strengths in the plan’s description of how LEAs are expected to identify homeless students, including through public outreach for increasing awareness and identifying children and youth experiencing housing instability. Reviewers also noted strengths in the plan’s description of how various data will be collected on the students identified to gauge LEA homeless identification counts as compared to other relevant data, such as poverty rates, in order determine the potential under-identification of children and to guide training needs and support from the SEA. Reviewers also noted the plan’s description of how reviews and the subgrant procedure occur, in addition to the information required, and in the plan’s mention of SEA monitoring of all LEAs regarding enrollment policies, data collection, and identification rates.
<i>Limitations</i>	Peer reviewers observed that the plan did not describe how local district needs assessments include procedures for increasing awareness and identification of homeless children and youth. It was also noted that the plan needs to clarify that monitoring will ensure that school districts are compliant with identifying and serving homeless children.
<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</i>	

<i>an SEA must provide to fully meet this requirement</i>	
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**I.2: Dispute Resolution (722(g)(1)(C) of the McKinney-Vento Act)**

- **Does the SEA describe procedures for the prompt resolution of disputes regarding the educational placement of homeless children and youth?**

	<i>Peer Response</i>
<i>Peer Analysis</i>	Reviewers observed that the plan provided a description of procedures for the prompt resolution of disputes regarding the educational placement of homeless children and youth, noting that the plan included the actual dispute resolution process that is in place for LEAs to follow. It was noted that the timeframes in the process should result in a prompt resolution of disputes that arise in LEAs. Reviewers also observed that the plan specified a step-by-step process from the initiation of a dispute through the resolution, describing a clear timeline and communication flow. It was also noted that the plan included assurances of compliance through monitoring.
<i>Strengths</i>	Reviewers identified strengths in the plan’s detailing of a specific process for dealing with the resolution of disputes, including timeframes to complete the dispute resolution process, and the requirement that the homeless child or youth be immediately enrolled in the school in which enrollment is sought until completion of the dispute resolution. Additional strengths identified included the plan’s inclusion of the actual formal dispute resolution process LEAs in the State are to follow, and the plan’s sharing of the dispute resolution process with parent advocacy groups such as the Wyoming Parent Information Center. Also noted was the plan’s description of annual training for liaisons on the dispute resolution process, and other means for communicating the dispute process through website materials and the Superintendent’s Memo process.
<i>Limitations</i>	The peer reviewers noted that the State plan addressed this requirement fully and did not identify any limitations in the SEA response to this requirement.
<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>	Reviewers observed that the plan described many options for types of trainings to increase awareness of the needs of homeless children and youth, including various trainings that are appropriate for multiple staff and are provided in varying platforms. It was also noted that the plan described training that would encompass many different types of positions, but that this may be unrealistic for meeting a broad range of needs.
<i>Strengths</i>	Reviewers identified strengths in the plan’s description of the variety of training opportunities on McKinney-Vento available for staff members across districts, including through the usage of an online training curriculum and other online resources that minimize travel for the State Coordinator and allow school personnel immediate access to training materials. Reviewers also noted that training attendees come from various agencies.
<i>Limitations</i>	Reviewers noted that the plan could have provided more specific types of trainings for a variety of different personnel (such as school leaders, attendance officers, and teachers) rather than all staff attending the various trainings. For example, new local liaisons have different needs than experienced liaisons and enrollment personnel have different questions and needs than teachers. Reviewers also noted that the plan did not address runaway youth, or accountability measures to ensure that the school personnel mentioned receive such awareness training and activities.
<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 the plan could be strengthened by providing more detailed descriptions of the various technical assistance activities that were mentioned (online training, statewide workshop, and online training), and by including possible monitoring and accountability.

**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 plan indicated that while the SEA did not have a public preschool program, the SEA coordinates with multiple organizations and agencies that oversee early childhood programs to ensure that young homeless children qualify for the programs that are available in the State. The plan described proactive collaboration with the State Head Start Collaboration Office, Department of Family Services, private preschools, child care centers, and the Early Intervention Council to increase understanding of homeless students, and to facilitate Child Find activities and receive early childhood interventions.
<i>Strengths</i>	Reviewers identified strengths in the plan’s description of how the State Coordinator actively collaborates with available early childhood programs in the State to increase understanding of the needs of homeless children, including Head Start, Family Services, the Early Intervention Council, and private preschool providers. Also noted was the plan’s description of materials and training for preschools and agencies to develop understanding and potential services.
<i>Limitations</i>	Reviewers noted that the plan did not provide details on how the State Coordinator works with the available preschool programs to make sure that homeless children who qualify are able to access and participate in available programs.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (2) Reviewers <input checked="" type="checkbox"/> No (1) Reviewer
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	It was indicated that the plan could be strengthened by addressing how the SEA will ensure that homeless children have access to available preschool programs, as well as special education preschool programs.

- **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>	Reviewers observed that the plan described the expectations the SEA has for LEAs to work with and in the community to provide awareness training and information. It was also noted that the plan demonstrated different areas in which the schedules of various districts can create issues for mobile students, including homeless youth, but establishes the expectation that LEAs need to make sure students are receiving credit for the work they have accomplished. Reviewers observed that the plan described procedures to ensure that homeless youth are identified and accorded equal access, and described coordination throughout the State. Reviewers also noted that the plan described the training and informational materials provided to LEAs, encourages external collaboration with agencies in order to improve their understanding of homeless students, and supports the students' equal access to secondary education and services.
<i>Strengths</i>	Reviewers identified strengths in the plan's description of efforts to engage community organizations and other stakeholders to evaluate potential barriers to providing full or partial credit for coursework completed by homeless youth. Reviewers also saw strengths in the plan's description of training that will be made available for community organizations regarding the homeless education program, and for students on the new ESSA requirements for full and partial credit accrual. It was observed that the practice of accepting full and partial credit for students experiencing homelessness could help reduce credit accrual barriers for secondary students.
<i>Limitations</i>	Reviewers noted that the plan could have provided more detail on a number of issues related to credit accrual, including the training being provided to LEAs (such as training content, how the training is conducted, and who is required to attend, such as counselors, administrators, and student services personnel), how barriers will be removed, and how youth separated from public school are identified.
<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</i>	It was indicated that the plan could be strengthened by including more detail on the procedures that were addressed (such as training, informational sessions, and monitoring.)

<i>an SEA must provide to fully meet this requirement</i>	
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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>	Peer reviewers observed that the plan provided multiple examples of how the SEA and LEAs may provide homeless students the opportunity to participate in extracurricular activities, summer school, online learning, and charter school programs, including summer school and online learning programs that are available from the State. It was also observed that the SEA states that it adheres to the federal requirement for immediate enrollment for homeless students as defined by fully attending classes and participating in extracurricular activities. Reviewers observed that the plan encouraged districts to provide the same supports for homeless students as with low-income students who need assistance with fees, materials, or school participation. It was also noted that the plan offered limited details on the procedures for this requirement.
<i>Strengths</i>	Reviewers identified strengths in the plan, including the plan’s description of procedures and programs that are in place to assist homeless youth with full participation in many of the areas listed in the prompt. Reviewers also saw strengths in the plan’s description of how the SEA works with LEAs to develop innovative approaches to ensure that all students have access to the internet outside of school, and the SEA’s monitoring of charter school programs. Reviewers also noted the plan’s mention of summer learning program opportunities for homeless students as a source of additional academic support.
<i>Limitations</i>	Reviewers observed that the plan did not provide detail on how students can access advanced placement programs, which programs are available, procedures that will be used to ensure that LEAs provide needed supports to students. The reviewers also noted that the plan did not provide detail on how the SEA will provide ongoing training and technical assistance to LEA personnel to ensure that there is an understanding of the barriers that homeless children and youth experience in accessing academics and extracurricular activities and that these barriers are removed.
<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</i>	Reviewers indicated that the plan could be strengthened by encouraging LEAs to have procedures in place, and showing that the State ensures that procedures are in place, including procedures to ensure that homeless children and youth can access all programs indicated in the requirement. Reviewers also

<i>an SEA must provide to fully meet this requirement</i>	indicated that the plan could be strengthened by clarifying what programs and activities in the requirement are offered in the State, and suggested that the plan describe what training and technical assistance is in place to ensure adherence to the McKinney-Vento Act.
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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>	Reviewers found that the plan provided its strategies for LEAs to address enrollment delays, but that the strategies were limited. While the plan was observed to address requirements i-v, reviewers indicated that the plan needed to provide more details and ensure that all areas were addressed fully.
<i>Strengths</i>	Reviewers identified strengths in the plan’s inclusion of details regarding strategies to help decrease enrollment delays and address barriers for homeless students, including through the provision of training for LEAs, website postings, coordination with various agencies, and Title I Part A technical assistance. Reviewers also identified strengths in the plan’s provision of information on State-specific immunization guidelines and on how all students have a timeframe to acquire records or immunizations.
<i>Limitations</i>	Reviewers noted that the plan stated that the SEA provided training and made staff aware of the issues, but did not provide details about each of the issues described in the requirement, including how residency requirements and other enrollment delays would be addressed, as well as how monitoring would help address any of the enrollment delays mentioned.
<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>	Reviewers observed the plan included SEA guidance to LEAs regarding local policy development, review, and revision to address barriers to enrollment for homeless students. It was noted that the plan addressed four of the five areas described in the requirement. Reviewers also noted the plan’s description of how the SEA will use data to track issues related to barriers, guide the provision of technical assistance, and develop exemplary board policies for school districts.
<i>Strengths</i>	Reviewers identified strengths in the plan’s description of how State policies and procedures were reviewed by the State Attorney General to ensure compliance with ESSA changes. Reviewers also noted the plan’s description of SEA monitoring protocols, including how the protocols will help target areas of need and enrollment barriers for homeless children and youth, and monitor LEA usage of SEA written guidance on board policies. Also observed was the plan’s description of how the State reviews and evaluates data regarding barriers for homeless students.
<i>Limitations</i>	Reviewers observed that the plan did not specifically address what processes are in place to remove barriers to the identification, enrollment, or retention of homeless children and youth in school, including through the review and revision of policies. Reviewers noted that the SEA provided training on the new requirement to evaluate policies regarding fees, fines, or absences in June 2016 to prepare LEAs for ESSA implementation, and the plan stated that the SEA will continue to review technical assistance requests and monitoring results to determine opportunities for improvement. However, it did not specify what ongoing technical assistance and training the SEA will provide LEAs to ensure that LEA policies remove barriers to the identification, enrollment, and retention of homeless children and youth.
<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</i>	It was indicated that the plan could be strengthened by addressing how the SEA and LEAs will remove barriers to identification, enrollment, and retention of homeless children and youth through policies.

<i>an SEA must provide to fully meet this requirement</i>	
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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>	Reviewers observed that the plan provided specific details about how homeless youth will receive college preparation and readiness assistance, including through the provision of information about specific scholarship programs, including the State’s Hathaway Scholarship Program, the State Coordinator’s establishment of links between counselors and liaisons, and the SEA’s usage of federal resources to help educate counselors on ways to provide information to homeless students. Reviewers noted the plan’s description of the requirement that all eighth grade students receive instruction concerning post-secondary preparation, which can help address this requirement for college preparation and readiness for homeless youth.
<i>Strengths</i>	Reviewers identified strengths in the plan’s description of the State requirement that all eighth-graders are to receive instruction concerning post-secondary preparation, including information about the State’s Hathaway Scholarship Program. Also noted was the plan’s description of how counselors are trained about the homeless program and the need to provide post-secondary information to homeless students. Reviewers also saw strengths in the plan’s mention that the implementation of this requirement will be monitored by the SEA.
<i>Limitations</i>	Reviewers observed that plan did not provide detail regarding how counselors will provide assistance to homeless youth that is specific to their needs. Reviewers also noted that the plan did not address how homeless students who enroll in a district after their eighth-grade year are provided with guidance or what ongoing support is provided to meet the unique needs of homeless youth.
<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>	