

STATE PLAN

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

State Name: Delaware
Reviewer Name: Consolidated Notes



U.S. Department of Education
April 26, 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 agreed that the SEA described procedures that it will use to identify homeless children and youth in the State and to assess their individual needs. |
| <i>Strengths</i> | A particular strength noted by all reviewers was the statewide pupil accounting system that allows LEA and SEA staff to access real-time data on homeless students including the services that they have received. Other strengths included the use of a liaison committee to inform the creation of training materials and differentiated training for new and veteran local liaisons with regard to identifying children and youth experiencing homelessness. |
| <i>Limitations</i> | <p>One significant limitation of the State plan description was that the SEA did not specifically describe how data from the statewide pupil accounting system would be used for the systematic analysis of the needs of children and youth experiencing homelessness in their State as a whole group. Another limitation was that it did not describe specifically how it would use information gathered from technical assistance, monitoring and other data sources to systematically analyze issues of identification and needs assessment for students experiencing homelessness in the State as a whole group.</p> <p>Based on the peer review, it was recommended that the SEA articulate clearer procedures for systematically analyzing various kinds of information to improve the identification of homeless children and youth in the State and the assessment of their needs at a statewide level.</p> |
| <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 this State plan part may require revision because the dispute resolution procedures in State code have not been updated to reflect ESSA amendments to EHCY. |
| <i>Strengths</i> | The peer review panel was impressed that homeless student dispute resolution procedures are in State code. |
| <i>Limitations</i> | A significant missing element of these procedures, last reviewed and approved in 2008, is that eligibility is not specifically mentioned as a grounds for initiating an enrollment dispute. |
| <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> | Two reviewers did not think this description met requirements due to the missing mention of eligibility as grounds for dispute. Since amending State code can take many months, the SEA could instead describe its process and timeline for amending this code. |

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 description restated the content of this item for SEAs to describe training and awareness programs for various kinds of school personnel. |
| <i>Strengths</i> | As strengths, the peer review panel noted that the SEA will provide training opportunities for local liaisons in person and online. It will also involve local liaisons in the development of training materials, including for registrars. |
| <i>Limitations</i> | Programs were not specifically described and differentiated for various kinds of school personnel. |
| <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> | It is recommended that the SEA describe the following for its programs: <ul style="list-style-type: none"> • the personnel that will be targeted • how those audiences will receive the information • the role of liaisons in developing and providing training and the role of the SEA in supporting the creation of the training and resources • examples of fora (e.g., organizations and conferences) that the SEA will use to heighten awareness |

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 agreed that the SEA did not describe procedures that ensure that homeless children have access to public preschool programs. |
| <i>Strengths</i> | The current collaboration with Head Start and other early childhood programs could increase access to public preschool programs. |
| <i>Limitations</i> | No specific SEA procedures for ensuring access to public preschool programs were offered. There was not any information on how many LEAs offer these programs. |
| <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> | It was recommended that the SEA describe its specific procedures to ensure access to public preschool program, for example, how its collaboration among EHCY, Early Childhood and Head Start supports this. |

- **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 agreed that the SEA did not describe procedures that ensure this requirement. |
| <i>Strengths</i> | The topic was mentioned in the description under item I.6 in that a liaison committee will draft a sample LEA policy for awarding credit to prior coursework. |
| <i>Limitations</i> | Strategies at the SEA (and perhaps LEA) level should be described that address the identification of, and appropriate secondary education and support services that will be provided to youth and youth separated from public schools. |
| <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 should describe more than one specific strategy for addressing these topics. For example, there was some mention of the SEA highlighting successes and challenges of LEAs in the removal of barriers through its monitoring, but it was not clear how that would ensure the SEA meeting the requirements of this item. |

- **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 agreed that the SEA did not describe procedures that meet this requirement. |
| <i>Strengths</i> | None were noted. |
| <i>Limitations</i> | The peer review panel observed no information was provided in the plan that addresses this item. |
| <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 should clearly indicate which of the requested categories are available at the State and local levels. Furthermore, the SEA should also describe how removal of barriers to access to the available categories is monitored and enforced by the SEA if those are the main procedures of the SEA. |

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 review panel agreed that the SEA did not describe strategies that address all of the problems mentioned in this item. |
| <i>Strengths</i> | The peer review panel observed as a strength the SEA highlighting that Title I, Part A funds may be used for uniform/dress code requirements for homeless students is reasonable and the same strategy might be used for other problems encountered in LEAs. |
| <i>Limitations</i> | Items ii, iii, and iv were not specifically discussed. Furthermore, it was not clear how a directory of community wellness resources will remove enrollment delays due to immunizations or other health records. While training and monitoring are mentioned, what will be included in the training and who will be trained is not stated, nor how these problems will be taken up in monitoring. |
| <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 should describe more specific strategies and ensure that all topics listed in i-v are addressed by at least one strategy mentioned. |

The SEA's plan addresses the following problems encountered by homeless children and youths that disrupt their education resulting from enrollment delays:

- (X-1) immunization and other health record requirements
- residency requirements
- lack of birth certificates, school records, or other documentation
- guardianship issues
- (X-2) uniform or dress code requirements

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 did not agree that the SEA demonstrated that it met this requirement. |
| <i>Strengths</i> | The SEA plans to provide training to LEA staff to assist them in reviewing and revising policies to remove barriers to enrollment. Additionally the SEA will draft a sample policy, authored by a liaison committee. Addressing credit accrual to improve retention is a reasonable action. The SEA also desires to address policy revisions through training, technical assistance and monitoring. |
| <i>Limitations</i> | The description repeats the topics in the item without providing any demonstrated evidence of reviewing and revising policies. There is no reference to current or proposed policies pertaining to the topics mentioned in this item. The plan states that review and revision will require training, technical assistance, and collaboration, and that monitoring will be used to identify successes and challenges. No detail is provided to explain the status of these issues as barriers or current practices. |
| <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> | The SEA should describe specific policies that it has developed, reviewed and/or revised. As one example, the SEA could explain how the DSCYF custody policy and regulation change could apply to children and youth experiencing homelessness. If the SEA has plans to develop or revise policies to remove barriers to enrollment and retention due to outstanding fees or fines, or absences, explaining these plans or processes could meet requirements. If these topics will be addressed primarily through monitoring and technical assistance, the SEA should describe how this relates to developing, reviewing and/or revising its policies and LEA policies. |

The SEA’s plan includes the following policies to demonstrate that the SEA and LEAs in the State have developed, and shall review and revise, policies to remove barriers to the identification, enrollment and retention of homeless children and youth:

- (X-1) identification of homeless children and youth
- (X-1) enrollment of homeless children and youth

- (X-1) retention of homeless children and youth
- (X-2) outstanding fees or fines
- (X-2) absences

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 agreed that the SEA met requirements for this item. |
| <i>Strengths</i> | The State offers an impressive range of ways in which middle and high school youth experiencing homelessness can receive assistance to prepare and improve their readiness for college. |
| <i>Limitations</i> | <p>The forms of assistance available in Delaware were not specifically tied to assisting youth experiencing homelessness, except for the SAT waiver.</p> <p>Some recommendations to strengthen the likelihood that homeless students will benefit from them include: SEA support for liaison trainings to be conducted with counselors, monitoring questions related to liaison interactions with counselors, and collecting data on high school graduation rate and the number of students who are homeless who pursue higher education. In addition, reviewers noted this is an appropriate plan in the plan to address the new requirement that unaccompanied homeless youth be informed of their independent status on the FAFSA.</p> |
| <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> | |