

# STATE PLAN

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

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State Name: South Carolina



**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 reviewers stated that the State's plan described comprehensive and collaborative identification and needs assessment procedures that meet the requirements, and include a timeline, funding source and roles of the liaison and State Coordinator.
<i>Strengths</i>	The reviewers saw strengths in the plan including that the SEA described coordination activities and encouragement to engage in best practices. It was noted that the use of the survey during the enrollment process, training of all personnel and staff for the protocol of referring possible students to the liaison, the dissemination of information in public places, and training and coordination with other school entities and outside community agencies to meet the identified needs of the students was a strength of this section. Peer reviewers also observed that the plan included the implementation of a statewide needs assessment and features efforts to identify LEAs that are under-reporting homeless children and youth. LEA program needs assessment is conducted annually, which informs how local programs are monitored for compliance.
<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.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 there are procedures in place at the LEA and SEA levels to address complaints and disputes regarding educational placement of homeless children and youth, and that the plan gave a definitive timeline for prompt resolution when a dispute has been filed.
<i>Strengths</i>	The reviewers noted that the plan detailed what the timelines are regarding the initial filing of a dispute by the parent, guardian and/or student such that school enrollment is not delayed. The plan addressed the assistance of the State Coordinator to the parent, guardian and or youth to ensure disputes are handled according to the guidelines set. Additionally, reviewers noted review and revision of local district policy is planned for the 2018-2019 school year to ensure compliance with ESSA and dispute resolution procedures are routinely reviewed during monitoring.
<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>	The reviewers observed that the SEA has a plan in place to ensure support for school personnel, including various modes of trainings being offered by the SCDE to increase awareness of homeless children and youth, and that the plan included trainings provided to additional service providers as requested.
<i>Strengths</i>	Reviewers noted as strengths the inclusion of strategies ensuring professional development, training and technical assistance and monitoring of LEAs. The plan also included requests for evidence that school personnel are receiving the appropriate training. It was noted that school personnel and service providers are trained via conference attendance and annual statewide professional development. This training is offered to other sections of the school administration such as Title 1, IDEA, and Head Start. Reviewers also saw that practitioners receive training through webinars and trainings offered by NCHE and School House Connections, as well as through attendance at the annual NAEHCY conference.
<i>Limitations</i>	It was noted that the plan did not clearly define which agencies worked with runaway 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>	

#### **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 State's plan addressed homeless children of preschool age and how they are ensured access to public preschool programs. Also noted was the collaboration of the State Coordinator and the LEAs, Head Start, Early Head Start, and Migratory Head Start to ensure information is received for homeless students who meet eligibility for preschool programs.
<i>Strengths</i>	The reviewers found childcare vouchers specific to McKinney-Vento eligible students allowing them to attend quality early childhood education opportunities to be a strength of the plan. Additionally, reviewers noted collaboration with various State and local agencies/partners to ensure access, including how to best leverage resources to support these efforts, annual professional development on best interest and rights of homeless children for LEAs and childcare agencies, enrollment of students based on Medicaid and free and reduced lunch protocols, and allocation of slots for homeless students.
<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>	

- **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>	Peer reviewers observed that the State's plan described strategies to ensure that separated youth are identified and provided opportunities to meet the same academic opportunities as all students. It was also observed that the plan explained the process for students re-entering the LEA and the responsibility of the liaison to coordinate with school counselors to ensure that full and partial credit is given for coursework completed.
<i>Strengths</i>	Reviewers noted that the SEA provided a strong and collaborative plan for professional development and technical assistance, and noted implementation of dropout prevention programs and recovery programs. Additionally, the plan described the use of Title 1 funds to provide services, review of current policies to detect barriers, coordination with dropout programs and knowledge of graduation initiatives, training to counselors on fee waivers and FAFSA support.
<i>Limitations</i>	Reviewers noted that the SEA did not describe ongoing monitoring efforts to ensure strategies occur, and did not mention the liaison making contact with the prior school to ensure records are transferred accordingly.
<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>	



- **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 State's plan described strategies to ensure students experiencing homelessness do not face barriers to access extra-curricular activities. Reviewers observed trainings provided to magnet, charter schools, and online schools to ensure homeless students do not face barriers to eligibility.
<i>Strengths</i>	Reviewers noted SEA collaboration with the State athletic association to allow for homeless students to participate, as well as collaboration with outside agencies to remove barriers such as transportation, athletic gear, and musical instruments. Reviewers also highlighted the SEA intent to maximizing Title 1 funding and the State Coordinator developing and providing training and technical assistance to a variety of other agencies, associations and entities, to address barriers that are typically faced by homeless children and youth with access to such programs.
<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.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>	Peer reviewers observed that the State’s plan described an array of procedures developed to address the specific requirements of this requirement. Reviewers mentioned training and ongoing technical assistance for LEA staff to ensure immediate enrollment when a student is lacking required documentation.
<i>Strengths</i>	Reviewers noted that the State monitors each LEA every three years and that the monitoring protocol includes a review of LEA strategies to address the removal of barriers. Also, the plan described the use of educational posters in areas frequented by homeless families, and assistance and training from the SEA and local liaison is provided to enrollment staff was also referenced. Liaisons also assist in providing supplies and uniforms from donations and other local organizations.
<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.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 State's plan ensured a broad review of policies to remove all barriers experienced by children and youth experiencing homelessness, with scheduled, comprehensive oversight by the McKinney-Vento State Coordinator.
<i>Strengths</i>	Peer reviewers noted that the SEA intends to thoroughly review all existing policies and procedures related to the removal of barriers. Additionally, the SEA will monitor all LEAs to ensure a local review of policies to remove barriers. In addition, the plan noted that accommodations will be put in place for homeless students with respect to discipline and attendance when directly related to homelessness, and described a process in which the State Coordinator provides guidance to LEAs for policy review and revision, and noted that South Carolina State regulations prohibit delays in enrollment or transfer of school records due to outstanding fees or fines.
<i>Limitations</i>	It was noted that the State's plan did not address graduation, as it relates to unpaid fees or fines.
<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.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>	Peer reviewers observed that the State plan described how unaccompanied youth and homeless students will receive assistance to improve readiness for college, listing an array of services and supports to be provided by school counselors to improve college/career readiness.
<i>Strengths</i>	Peer reviewers saw strengths in the plan that included a description of a process where the SEA will develop a McKinney-Vento Higher Education Network, and additionally, the plan noted that each local liaison provides training to the counselors on completing the FASFA and informing students of their independent status.
<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>	