



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

June 13, 2017

The Honorable Steve Canavero
Superintendent of Public Instruction
Nevada Department of Education
700 East Fifth Street
Carson City, NV 89701

Dear Superintendent Canavero:

Thank you for submitting Nevada's consolidated State plan to implement requirements of covered programs under the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESSA), and of the amended McKinney-Vento Homeless Assistance Act (McKinney-Vento Act).

I am writing to provide initial feedback based on the U.S. Department of Education's (the Department) review of your consolidated State plan. As you know, the Department also conducted, as required by the statute, a peer review of the portions of your State plan related to ESEA Title I, Part A, ESEA Title III, Part A, and the McKinney-Vento Act using the Department's *State Plan Peer Review Criteria* released on March 28, 2017. Peer reviewers examined these sections of the consolidated State plan in their totality while respecting State and local judgments. The goal of the peer review was to support State- and local-led innovation by providing objective feedback on the technical, educational, and overall quality of a State plan and to advise the Department on the ultimate approval of the plan. I am enclosing a copy of the peer review notes for your consideration.

Based on the Department's review of all programs submitted under Nevada's consolidated State plan, including those programs subject to peer review, the Department has identified in an enclosure to this letter the items that Nevada must address in order for the Secretary to approve Nevada's consolidated State plan. Please note that the Department's feedback may differ from the peer review notes. I encourage you to read the full peer notes for additional suggestions and recommendations for improving your consolidated State plan, but Nevada is required to address only those areas identified by the Department as requiring additional information or revision to obtain approval of its State plan.

ESEA section 8451 requires the Department to issue a written determination within 120 days of a State's submission of its consolidated State plan. Given this statutory requirement, I ask that you revise Nevada's consolidated State plan and resubmit it through OMB Max within 15 days of the date of this letter. If you need more time than this to resubmit your consolidated State plan, please contact your Office of State Support Program Officer, who will work with you in establishing a new submission date. Please recognize that if we accommodate your request for

400 MARYLAND AVE., SW, WASHINGTON, DC 20202
www.ed.gov

The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.

additional time, we may be unable to issue a written determination on your plan within the 120-day review period.

Department staff will contact you to support Nevada in addressing the items enclosed with this letter. If you have any immediate questions or need additional information, I encourage you to contact your Program Officer for the specific Department program.

Please note that the Department only reviewed information provided in Nevada's consolidated State plan that was responsive to the Revised Template for the Consolidated State Plan that was issued on March 13, 2017. Each State is responsible for administering all programs included in its consolidated State plan consistent with all applicable statutory and regulatory requirements.

Thank you for the important work that you and your staff are doing to support the transition to the ESSA. The Department looks forward to working with you to ensure that all children have the opportunity to reach their full potential.

Sincerely,

/s/

Jason Botel
Acting Assistant Secretary

Enclosures

cc: Governor
State Title I Director
State Title II Director
State Title III Director
State Title IV Director
State Title V Director
State 21st Century Community Learning Center Director
State Director for McKinney-Vento Homeless Assistance Act: Education for Homeless Children and Youths Program

Items That Require Additional Information or Revision in Nevada’s Consolidated State Plan

Title I, Part A: Improving Basic Programs Operated by Local Educational Agencies	
<p>A.2.iii: Eighth Grade Math Exception: Strategies</p>	<ul style="list-style-type: none"> • The Nevada Department of Education (NDE) must clarify that, consistent with ESEA section 1111(b)(2)(C) and 34 CFR § 200.5(b), it will only apply this exception to 8th grade students; that such a student’s performance on the high school mathematics end-of-course assessment is used in the year in which the student takes the assessment for purposes of measuring academic achievement under ESEA section 1111(c)(4)(B)(i) and participation in assessments under ESEA section 1111(c)(4)(E); and that, in high school, such a student takes a State-administered end-of-course assessment or nationally recognized high school academic assessment as defined in 34 CFR § 200.3(d) in mathematics that is more advanced than the assessment the State administers under ESEA section 1111(b)(2)(B)(v)(I)(bb). • NDE must describe the strategies to provide all students in the State the opportunity to be prepared for and to take advanced mathematics coursework, such as algebra, in middle school. In its State plan, NDE states that it does not place an extra emphasis on algebra enrollment and completion in middle school and describes the strategies it will use to prepare upper elementary and middle school students for high school mathematics instruction generally.
<p>A.4.iii.a.1: Academic Achievement Long-term Goals</p>	<p>NDE must provide long-term goals for each major racial and ethnic subgroup identified in A.4.i.a. For example, in its State plan, NDE does not provide long-term goals for the Pacific Islander and Two or More Races subgroups, as identified in A.4.i.a., for elementary schools.</p>
<p>A.4.iii.a.2: Academic Achievement Measurements of Interim Progress</p>	<p>NDE must provide measurements of interim progress that correspond to its long-term goals for academic achievement (i.e., by grade span and subject) and for all students and each subgroup of students. When establishing the measurements of interim progress for each subgroup of students, NDE must take into account the improvement necessary for subgroups of students who are behind to make significant progress in closing statewide academic achievement gaps, such that the State’s long-term goals require greater rates of improvement for subgroups of students that are lower achieving.</p>
<p>A.4.iii.b.1: Long-term goals for four-year adjusted cohort graduation rate</p>	<p>NDE must provide long-term goals for each major racial and ethnic subgroup identified in A.4.i.a. For example, in its State plan, NDE does not provide long-term graduation rate goals for the White or Two or More Races subgroups.</p>
<p>A.4.iii.b.3: Graduation Rate Measurements of Interim Progress</p>	<p>NDE must provide the measurements of interim progress toward the long-term goals for the four-year adjusted cohort graduation rate and the five-year adjusted cohort graduation rate for each</p>

	<p>subgroup of students. When establishing the measurements of interim progress for each subgroup of students, NDE must take into account the improvement necessary for subgroups of students who are behind to make significant progress in closing statewide graduation rate gaps, such that the State’s long-term goals require greater rates of improvement for subgroups of students that graduate from high school at lower rates.</p>
A.4.iii.c.1: English Language Proficiency Long-term Goals	<p>NDE must identify and describe the long-term goal for English learners for increases in the percentage of such students making progress in achieving English language proficiency, as measured by the statewide English language proficiency assessment, including: (i) baseline data; (ii) the State-determined timeline for such students to achieve English language proficiency; and (iii) how the long-term goal is ambitious. NDE provides a long-term goal for achievement of English language proficiency, but not for progress in achieving English language proficiency.</p>
A.4.iii.c.2: English Language Proficiency Measurements of Interim Progress	<p>NDE must provide measurements of interim progress toward the long-term goal for increases in the percentage of English learners making progress in achieving English language proficiency.</p>
A.4.iv.a: Academic Achievement Indicator	<ul style="list-style-type: none"> • NDE must ensure that the Academic Achievement indicator required under ESEA section 1111(c)(4)(B)(i)(I) includes only measures consistent with ESEA section 1111(c)(4)(B). Specifically, NDE must, for the Academic Achievement indicator, include only proficiency on the annual assessments required under ESEA subsection (b)(2)(B)(v)(I) (<i>i.e.</i>, reading/language arts and mathematics); a State may include performance on assessments other than those required under ESEA subsection (b)(2)(B)(v)(I), including the science assessment, in the indicator for public elementary and secondary schools that are not high schools required under ESEA section 1111(c)(4)(B)(ii) (<i>i.e.</i>, the Other Academic indicator) for elementary and secondary schools that are not high schools or in the School Quality or Student Success indicator for any schools, including high schools. • NDE must describe the weighting of reading/language arts achievement relative to mathematics.
A.4.iv.c: Graduation Rate Indicator	<ul style="list-style-type: none"> • NDE must describe how it will combine the four-year adjusted cohort graduation rate and extended-year adjusted cohort graduation rate within the indicator. • NDE must provide its definition of an alternate diploma and demonstrate that the alternate diploma is (1) standards-based; (2) aligned with the State requirements for a regular high school diploma; and (3) obtained within the time period for which the State ensures the availability of a free appropriate public education under section 612(a)(1) of IDEA.
A.4.iv.e: School Quality or	<ul style="list-style-type: none"> • Closing Opportunity Gaps Indicator: NDE must describe how the Closing Opportunity Gaps

<p>Student Success Indicator(s)</p>	<p>indicator: (i) allows for meaningful differentiation in school performance; (ii) is valid, reliable, comparable, and statewide (for the grade span(s) to which it applies); and (iii) annually measures performance for all students and separately for each subgroup of students. The description NDE provides in the State plan does not provide enough detail to determine if the statutory requirements are met.</p> <ul style="list-style-type: none"> • Student Engagement Indicator (elementary and middle schools): NDE must describe how the Student Engagement indicator (elementary and middle schools): (i) allows for meaningful differentiation in school performance; (ii) is valid, reliable, comparable, and statewide (for the grade spans to which it applies); and (iii) annually measures performance for all students and separately for each subgroup of students. The description NDE provides in the State plan does not provide enough detail to determine if the statutory requirements are met. In addition, NDE must describe how school climate, which is a specific measure within the Student Engagement indicator, will be measured. • College and Career Readiness & Student Engagement Indicator (high schools): NDE must describe how the College and Career Readiness & Student Engagement indicator: (i) allows for meaningful differentiation in school performance; (ii) is valid, reliable, comparable, and statewide (for the grade span to which it applies); and (iii) annually measures performance for all students and separately for each subgroup of students. In addition, NDE must describe how Average ACT Composite Score, Post-Secondary Pathway Options, Ninth and Tenth Grade Credit Sufficiency, Academic Learning Plans, and Percentage of Students Achieving College and Career Readiness Status on Math, Science, and ELA End-of-Course Exams will be measured. The description NDE provides in the State plan does not provide enough detail to determine if the statutory requirements are met.
<p>A.4.v.a: State’s System of Annual Meaningful Differentiation</p>	<p>In its State plan, NDE indicates that it is currently establishing its accountability standard setting for each star rating level. NDE must describe its system of meaningfully differentiating, on an annual basis, all public schools in the State. The description NDE provides in the State plan is insufficient for determining whether the system will result in meaningful differentiation.</p>
<p>A.4.v.b: Weighting of Indicators</p>	<p>NDE must describe the weighting of each indicator for each grade span. This description must include the weighting of the Closing Opportunity Gaps indicator for high schools.</p>
<p>A.4.v.c: If Applicable, Different Methodology for Annual Meaningful Differentiation</p>	<ul style="list-style-type: none"> • NDE must include <u>all</u> schools in its system of annual meaningful differentiation, even if it uses an alternate methodology for schools for which an accountability determination cannot otherwise be made. NDE states that it will not rate certain schools, including P-2 schools and schools that serve special populations, despite the requirement that it include all schools in its

	<p>system of annual meaningful differentiation. NDE must describe how it will include all schools in its system of annual meaningful differentiation.</p> <ul style="list-style-type: none"> • NDE states that it will adjust accountability scoring of certain schools but does not describe the different methodology it will use to include those schools in its system of annual meaningful differentiation. NDE must describe the methodology or methodologies for annual meaningful differentiation of schools for which an accountability determination cannot be made, including how the methodology or methodologies will be used to identify schools for comprehensive or targeted support and improvement.
<p>A.4.vi.a Comprehensive Support and Improvement Schools— Lowest Performing</p>	<p>NDE must revise its State plan to clarify that it is identifying not less than the lowest-performing 5 percent of all Title I schools in the State, including high schools, for comprehensive support and improvement. In its State plan, NDE only discusses identifying the lowest-performing 5 percent of all public elementary and middle schools.</p>
<p>A.4.vi.c: Comprehensive Support and Improvement Schools— Additional Targeted Support Not Exiting Such Status</p>	<p>NDE must describe the methodology by which all schools receiving Title I, Part A funds that are identified for additional targeted support and fail to meet the exit criteria within Nevada’s designated timeframe of three years will be identified for comprehensive support and improvement.</p>
<p>A.4.vi.e: Targeted Support and Improvement Schools— “Consistently Underperforming” Subgroups</p>	<p>NDE must describe a methodology for identifying schools with one or more consistently underperforming subgroups that considers performance on all indicators in the statewide system of annual meaningful differentiation. NDE’s proposed methodology only considers performance on mathematics and English language arts.</p>
<p>A.4.vi.f: Targeted Support and Improvement Schools— Additional Targeted Support</p>	<ul style="list-style-type: none"> • NDE must describe a methodology for identifying schools for additional targeted support that considers performance of all subgroups on all indicators. NDE’s proposed methodology only considers performance on mathematics and English language arts. • NDE must describe a methodology to identify schools in which the performance of any subgroup of students, on its own, would lead to identification for comprehensive support and improvement under ESEA section 1111(c)(4)(D)(i)(I) (<i>i.e.</i>, NDE must evaluate subgroup performance against the performance of schools identified for comprehensive support and improvement based on low performance consistent with the statutory provision in ESEA section 1111(c)(4)(D)(i)(I)).
<p>A.4.viii.a: Exit Criteria for Comprehensive Support and Improvement Schools</p>	<p>NDE describes exit criteria but does not provide enough information as to how the exit criteria meet the statutory requirements. Specifically, NDE must clarify the meaning of “sustained improvement.” Additionally, NDE also states that a school must receive a 3-star rating to exit but does not provide sufficient information to determine that requiring a 3-star rating will ensure</p>

	continued progress to improve student academic achievement and school success in the State (i.e., that the exit criteria requires actual improvement as opposed to requiring that a school no longer meet the criteria for identification under which the school was identified).
A.4.viii.b: Exit Criteria for Schools Receiving Additional Targeted Support	NDE must clearly describe its statewide exit criteria for schools receiving additional targeted support that ensure continued progress to improve student academic achievement and school success in the State. The State plan does not provide sufficient detail to determine what criteria NDE will use to determine whether these schools make sufficient improvement to exit.
A.4.viii.c: More Rigorous Interventions	In its State plan, NDE only describes interventions that may apply to schools that are identified for comprehensive support and improvement that fail to meet the exit criteria within the State-determined number of years, such as identification as one of up to six schools added to the Nevada Achievement School District. NDE must describe the more rigorous State-determined action, which may include interventions that address school-level operations, required for all schools identified for comprehensive support and improvement that fail to meet the State’s exit criteria within the State-determined number of years.
A.5: Disproportionate Rates of Access to Educators	<ul style="list-style-type: none"> • Although NDE provides data for out-of- field and inexperienced teachers in Appendix C, NDE does not specifically address schools assisted under Title I, Part A and does not provide any data for ineffective teachers. Therefore, NDE must describe the extent, if any, that low-income children enrolled in schools assisted under Title I, Part A are served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers, which may include the State definition of ineffective, out-of-field, and inexperienced teachers. • Although NDE provides data for out-of- field and inexperienced teachers in Appendix C, NDE does not specifically address schools assisted under Title I, Part A and does not provide any data for ineffective teachers. NDE must describe the extent, if any, that minority children enrolled in schools assisted under Title I, Part A are served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers, which may include the State definition of ineffective, out-of-field, and inexperienced teachers. • NDE must describe the measure(s) it will use to evaluate and publicly report its progress with respect to how low-income and minority children are not served at disproportionate rates by ineffective, out-of-field, and inexperienced teachers.
A.6: School Conditions	Although NDE lists several strategies on school conditions in its Title IV, Part A section of its State plan, NDE does not specifically address how it will support schools receiving assistance under Title I, Part A. Nevada must describe how it will support LEAs receiving assistance under Title I, Part A to improve school conditions for student learning including through reducing: (i)

	<p>incidences of bullying and harassment; (ii) the overuse of discipline practices that remove students from the classroom; and (iii) the use of aversive behavioral interventions that compromise student health and safety.</p>
<p>Title I, Part C: Education of Migratory Children</p>	
<p>B.1: Supporting the Needs of Migratory Children</p>	<ul style="list-style-type: none"> • NDE describes how it will identify the unique educational needs of migratory children. However, NDE must describe how it will identify the unique educational needs of preschool migratory children and migratory children who have dropped out of school. • NDE’s description of the planning of its program must also include: <ul style="list-style-type: none"> ○ How it will address the identified unique educational needs of migratory children through the full range of services that are available for migratory children from appropriate local, State, and Federal educational programs. ○ How it is joint planning among local, State, and Federal education programs including language instruction educational programs under Part A of Title III. ○ How it is planning the integration of services available under Title I, Part C with services provided by those other programs. ○ How it is planning the measurable program objectives and outcomes. ○ How it will address the unique needs of preschool migratory children and migratory children who have dropped out of school. • NDE’s description of the implementation of its program must include: <ul style="list-style-type: none"> ○ How it will implement the full range of services provided by the State and the integration of those services against measurable program objectives and outcomes. ○ How it will implement joint planning among local, State, and Federal education programs. ○ How it will address the unique needs of preschool migratory children and migratory children who have dropped out of school. • NDE’s description of the evaluation of its program must include: <ul style="list-style-type: none"> ○ How it will evaluate the full range of services provided by the State and the integration of those service against measurable program objectives and outcomes. ○ How it includes an evaluation of the joint planning among local, State, and Federal programs. ○ How it will address the unique needs of preschool migratory children and migratory children who have dropped out of school.
<p>B.2. Promote Coordination of</p>	<p>NDE must specifically describe how it will use Title I, Part C funds to promote interstate and</p>

Services	intrastate coordination of services for migratory children when children move from one school to another whether or not such move occurs during the regular school year. In describing the process, NDE must include how it will provide for educational continuity through the transfer of pertinent school records, including information on health.
Title I, Part D: Prevention and Intervention Programs for Children and Youth Who Are Neglected, Delinquent, or At-Risk	
C.1: Transitions Between Correctional Facilities and Local Programs	While the State plan identifies four focus areas related to transition and indicates that State agency programs will annually identify transition activities, the information does not constitute a plan for assisting in the transition of children and youth between (i.e., to and from) correctional facilities and locally operated programs. NDE must revise its State plan to include a plan (e.g., a proposed list of steps, intended actions, or strategies) for assisting in the transition of children and youth between correctional facilities and locally operated programs (i.e., the transition from correctional facilities to locally operated programs as well as the transition from locally operated programs to correctional facilities).
C.2: Program Objectives and Outcomes	While Objective 4 of the State plan includes program objectives and outcomes for career and technical skills, it is unclear how assessing only whether students <i>have the opportunity</i> to participate in postsecondary and job training programs can be used to assess the effectiveness of the program in improving the career and technical skills of children in the program. NDE must revise its State plan to clarify how the described program objectives and outcomes will be used to assess the effectiveness of the program in improving the career and technical skills of children in the program.
Title II, Part A: Supporting Effective Instruction	
D.4: Improving the Skills of Educators	NDE must describe how it will improve the skills of teachers, principals, or other school leaders in order to enable them to identify students with specific learning needs, and provide instruction based on the needs for such students, specifically for: children with disabilities, English learners, students who are gifted and talented, and students with low literacy levels.
D.5: Data and Consultation	<ul style="list-style-type: none"> • NDE must describe how it will use ongoing consultation for all required stakeholders consistent with ESEA section 2101(d)(3) which includes teachers, principals, other school leaders, paraprofessionals (including organizations representing such individuals), specialized instructional support personnel, charter school leaders (in a State that has charter schools), parents, community partners, and other organizations or partners with relevant and demonstrated expertise in programs and activities designed to meet the purpose of Title II. • NDE generally describes consultation that was conducted prior to submission of the State

	<p>plan. However, NDE must describe how the State will use data and ongoing consultation, as described in ESEA section 2101(d)(3), to continually update and improve the all activities supported under Title II, Part A.</p>
<p>Title III, Part A, Subpart 1: English Language Acquisition and Language Enhancement</p>	
E.1: Entrance and Exit Procedures	<ul style="list-style-type: none"> • NDE must describe timely and meaningful consultation with LEAs representing the geographic diversity of the State specific to establishing and implementing standardized, statewide entrance and exit procedures. • NDE must include an assurance that all students who may be English learners are assessed for such status within 30 days of enrollment.
E.2: SEA Support for English Learner Progress	<p>Although NDE provided a description of technical assistance generally, this description did not specifically address the requirements for SEA support for English learner progress. NDE must describe:</p> <ul style="list-style-type: none"> • How it will assist eligible entities in meeting the State-designed long-term goal for progress in achieving English language proficiency established under ESEA section 1111(c)(4)(A)(ii), including measurements of interim progress towards meeting such goal, based on the State's English language proficiency assessment under ESEA section 1111(b)(2)(G); and • How it will assist eligible entities in helping to ensure that English learners meet challenging State academic standards.
E.3: Monitoring and Technical Assistance	<p>Although NDE provided a description about performance management generally, this description did not specifically address the requirements related to Title III, Part A. NDE must describe:</p> <ul style="list-style-type: none"> • How it will monitor the progress of each eligible entity receiving a Title III, Part A subgrant in helping English learners achieve English language proficiency; and • The steps it will take to further assist eligible entities if the strategies funded under Title III, Part A are not effective, such as by providing technical assistance and support on how to modify such strategies.
<p>Title IV, Part A: Student Support and Academic Enrichment Grants</p>	
F.1: Use of Funds	<p>In Section 6, the State plan describes how it will use funds from Title IV, Part A or other programs to support many state-level activities related to Title IV, Part A. It is not clear which of these state-level activities will be supported in whole or in part by Title IV, Part A funds. NDE must revise its State plan to clarify which of the state-level activities in Section 6 will be supported in whole or in part by Title IV, Part A funds.</p>
F.2: Awarding Subgrants	<ul style="list-style-type: none"> • The State plan indicates that Nevada will award funding for Title IV, Part A through a competitive grant application and review process to eligible entities in accordance with ESEA

	<p>section 4103. It further states that it will prioritize its awards according to those applications that align with Nevada’s State Goals. However, it does not indicate how the State will address the specific priorities mandated in the Consolidated Appropriations Act of 2017. NDE must revise its State plan to indicate how the State will comply with the priorities outlined in the Consolidated Appropriations Act of 2017, that these subgrants shall be made “with priority given to local educational agencies, or consortia of local educational agencies, with the greatest need based on the number or percentage of children counted under section 1124(c), in a manner that ensures geographic diversity among subgrant recipients representing rural, suburban and urban areas....”</p>
<p>Title IV, Part B: 21st Century Community Learning Centers</p>	
<p>G.2: Awarding Subgrants</p>	<p>NDE describes the priorities it will include in its local subgrant competition and how those priorities align to Nevada’s State Goals, but does not describe the procedures it will use to ensure that community learning centers will help participating students meet challenging State and local academic standards. Therefore, NDE must provide more detailed information about: 1) how NDE will ensure that proposed community learning centers will target their activities to students’ academic needs; and 2) how NDE will implement a rigorous peer review process.</p>
<p>Title V, Part B, Subpart 2: Rural and Low-Income School Program</p>	
<p>H.2: Technical Assistance</p>	<p>NDE must describe how it will provide technical assistance specifically to LEAs eligible for funds under the Rural and Low-Income School Program to help such agencies implement the activities described in ESEA section 5222. While NDE provided a description about how it will provide technical assistance to LEAs generally, this description did not specifically address technical assistance for RLIS-eligible LEAs. In particular, the description must include information about <i>how</i> NDE will provide technical assistance to RLIS-eligible LEAs (i.e., the methods and strategies). Additionally, the description must specifically address how NDE’s technical assistance will assist RLIS-eligible LEAs’ implementation of RLIS activities.</p>
<p>Education for Homeless Children and Youths Program, McKinney-Vento Homeless Assistance Act, Title VII, Subtitle B</p>	
<p>I.3: Support for School Personnel</p>	<p>The State plan describes programs for LEA and school personnel to heighten the awareness of the specific needs of homeless children and youth. It is not clear that these activities include heightening the awareness of school personnel of the specific needs of <i>runaway</i> and homeless children and youth. NDE must revise its State plan to clarify that the awareness programs for school personnel include heightening the awareness of such school personnel of the specific needs of runaway and homeless children and youth.</p>

<p>I.4 ii: Access to Services</p>	<p>The State plan indicates that NDE provides training to school staff, including school registrars and community organizations. It also indicates that the State coordinator <u>will work</u> (emphasis added) with school districts and possibly lawmakers to establish policies and procedures to provide appropriate credit for partial coursework satisfactorily completed while attending a school, in accordance with State, local, and school policies. It is not clear that the <u>current</u> training, however, addresses procedures to provide appropriate credit for partial coursework satisfactorily completed while attending a school, in accordance with State, local, and school policies. NDE must revise its State plan to clarify the current NDE procedures to ensure that homeless youth receive appropriate credit for full or partial coursework satisfactorily completed while attending a prior school, in accordance with State, local, and school policies.</p>
<p>I.4 iii: Access to Services</p>	<p>The State plan indicates that NDE has procedures in place to address some of the barriers listed in this item, including accessing extracurricular activities through the waiving of fees and accessing academic programs through the provision of tutors. It does not describe procedures to ensure that homeless children and youth who meet the relevant eligibility criteria do not face barriers to activities such as 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. NDE must revise its State plan to describe procedures that ensure that homeless children and youth who meet the relevant eligibility criteria do not face barriers to activities such as 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.</p>
<p>I.5: Strategies to Address Other Problems</p>	<p>While the State plan provides strategies for addressing problems with acquiring immunization records, birth certificates, and other school records, the State plan does not provide strategies to address other problems that are caused by requirements of other required health records, residency requirements, guardianship issues, or uniform or dress code requirements. NDE must revise its State plan to include strategies to address other problems resulting from enrollment delays that are caused by other required health records, residency requirements, guardianship issues, or uniform or dress code requirements.</p>
<p>I.6: Policies to Remove Barriers</p>	<p>While the State plan demonstrates policies to remove barriers to the enrollment and retention of homeless children and youth, such as the identification of homeless children and youth, immediate enrollment, and waiving of fees, the State plan does not demonstrate that NDE and LEAs in the State have developed, and shall review and revise, policies to remove barriers to the enrollment and retention of homeless children and youth due to outstanding fines or absences.</p>

	NDE must revise its State plan to demonstrate how NDE and LEAs in the State have developed, and shall review and revise, policies to remove barriers to the enrollment and retention of homeless children and youth in Nevada due to outstanding fines or absences.
I.7: Assistance from Counselors	The State plan indicates that NDE works with the National Association of Education of Homeless Children and Youth (NAEHCY) to provide access to the NAEHCY Higher Education Helpline in order for youths to receive assistance from counselors to advise such youths, and prepare and improve the readiness of such youths for college. It is not clear, however, if providing access to the hotline results in youth receiving this assistance. NDE must revise its State plan to indicate how NDE will ensure 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.
General Education Provisions Act (GEPA)	
GEPA 427	NDE must provide a description of the steps it will take to ensure equitable access to, and participation in, the programs included in its State plan for students, teachers and program beneficiaries with special needs consistent with the requirements in section 427 of the General Education Provisions Act.