

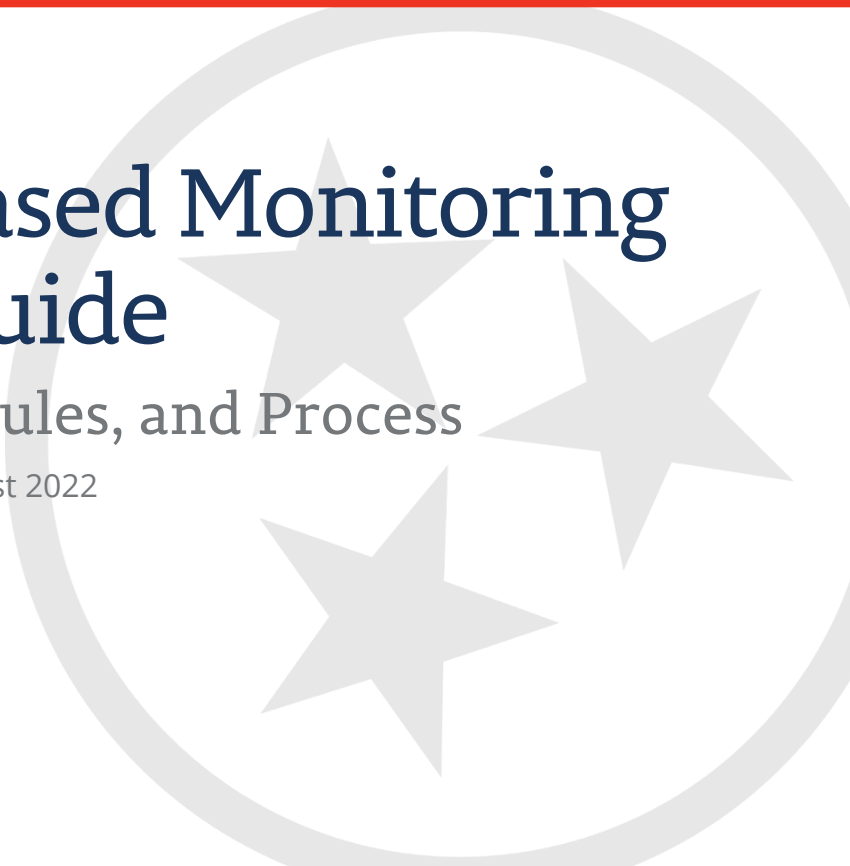


Department of  
**Education**

# FY23 Results-Based Monitoring Risk Analysis Guide

Data Factors, Business Rules, and Process

Tennessee Department of Education | August 2022



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# Results-Based Monitoring: Risk Analysis Overview

## Introduction to the FY23 Results-Based Monitoring Risk Analysis

In FY23, the Results-Based Monitoring Risk Analysis is embedded in [ePlan](#) under the **Data and Information** tab for all LEAs to view. For transparency purposes, this guide was also created to use as a companion to the risk analysis results to better understand the definition, read examples for some of the more complex data included, the number of points assigned to each data element, a fiscal or school year from where the data originated, and a point of contact if there are additional questions.

### New and Updated in FY23

Results-Based Monitoring levels have been updated to allow more flexibility for LEAs and the department.

#### Monitoring Levels

Level 3A: Traditional In-Person Monitoring of LEA and Schools with pre-work including uploads (*most closely resembles classic on-site monitoring from FY20 and prior*)

Level 3B: Virtual Monitoring of LEA and Schools with pre-work including uploads (*most closely resembles virtual on-site monitoring from FY21 and FY22*)

Level 2: Virtual Monitoring and Scheduled Discussions with LEA-Level (No School-Level) with pre-work including uploads (*most closely resembles a hybrid between virtual on-site and desktop monitoring from FY21 and FY22*)

Level 1: Virtual Monitoring of LEA-Level with minimal to no uploads (*most closely resembles self-assessment monitoring from FY22*)

#### Factors

New and updated factors with significant adjustments are highlighted in **yellow**, including:

- Isolation/Restraint Incidents
- ESSER 1.0 Reimbursement Requests (RR) – 80% Expended
- ESSER 2.0 Reimbursement Requests (RR) – 50% Expended
- State Funds FER Deadline
- Updated: ESEA/IDEA/ESSER Program Monitoring Years
- Perkins V Program Monitoring Years
- Fiscal Monitoring Years

## Identification via Risk Analysis

The risk analysis determines which LEAs must participate in each monitoring level each fiscal year. The risk analysis includes factors related to missed deadlines, staff experience, Office of Civil Rights (OCR) findings, total allocations of federal funds received, fiscal issues such as releasing funds, audit findings, program compliance findings, and years since last monitored via Level 3 Results-Based Monitoring, in addition to other factors. A review of all risk analysis categories occurs each year, beginning in early spring. During the review, internal department stakeholders edit and suggest factors that indicate the risk that an LEA will not comply with federal grant rules; key state laws; state board of education policies, Tennessee Perkins V state plan, rules, or guidance; or other communicated guidance from the department.

These factors include data collected regarding LEA grant programs; prior audits; and applications and plans that capture goals, strategies, action steps, values, and benchmarks based on funding, deadlines, data, and other risk factors. The department-level risk analysis process occurs by the end of July, dependent on the release of data that is often unavailable at the department until later in the summer months.

## Instructions

ESSA, IDEA, CTE, ESSER, or Fiscal Directors or the Director of Schools must acknowledge the FY23 Risk Analysis results. The director of schools must mark the results as LEA Reviewed. To do so, please:

1. Log into ePlan.
2. Click **Data and Information** on the left menu.
3. Under FY23, select **Results-Based Monitoring Risk Analysis**.
4. On the Sections page, click Draft Started and confirm the status change to view results.
5. From Sections, view the Risk Analysis page to review the data information.
6. Return to the Sections page, then click the Acknowledgement page.
  - a. Choose the preferred option. If *Acknowledge* is selected, skip to Step 7.
  - b. If *Appeal* is selected, please include a detailed statement for department review.
7. From the Sections page, click Draft Completed to complete the review process.
8. From the Sections page, the Director of Schools (Authorized Representative) must click LEA Reviewed to complete the review process.

*If Appeal is selected, the department reviews the appeal and responds within two business days.*

# Risk Analysis Data Factors

The department must conduct a risk analysis according to 2 CFR § 200.331, evaluate each subrecipient's (LEA's) risk of non-compliance for purposes of determining appropriate monitoring, and monitor its subrecipients to assure compliance and performance goals are achieved. Monitoring must include reviewing financial (OCFO) and programmatic (FPO) reports, ensuring corrective action (*Monitoring Results*), and issuing a management decision on audit findings (approval/non-approval).

From the Committee of Sponsoring Organizations of the Treadway Commission (COSO):

*“Enterprise risk management is a process, effected by an entity's board of directors, management and other personnel, applied in strategy setting and across the enterprise, designed to identify potential events that may affect the entity, and manage risk to be within its risk appetite, to provide reasonable assurance regarding the achievement of entity objectives.”*

Enterprise risk management is:

- A process, ongoing and flowing through an entity
- Effected by people at every level of an organization
- Applied in strategy setting
- Applied across the enterprise, at every level and unit, and includes taking an entity-level portfolio view of risk
- Designed to identify potential events that, if they occur, affect the entity and to manage risk within its risk appetite
- Able to provide reasonable assurance to an entity's management and board of directors
- Geared to the achievement of objectives in one or more separate but overlapping categories

## Risk Analysis Committees

In Fall 2020, FPO developed risk analysis committees to review data as part of the commitment to continuous improvement of the monitoring process. Each committee is led by the senior director of compliance and oversight and includes key stakeholders from the department to help make decisions regarding data factors and their associated points, which, when combined, determine a score for each LEA.

Goals of the Risk Analysis Subcommittees are to:

- simplify the risk analysis,
- remove categories that have little impact,
- simplify the calculation process, and,
- beginning in FY22, embed the process in ePlan for additional transparency and ease of recordkeeping purposes.

The following subcommittees meet once monthly: ESSA Subcommittee, IDEA Subcommittee, Perkins Subcommittee, Fiscal Subcommittee, and Cross-Cutting Subcommittee.

## Identification Timeline

On an annual basis, the risk analysis process occurs on the following timeline:

- **November:** Invite participants to subcommittees
- **December:** Discuss challenges; propose deletion or moving items to other categories.
- **January:** Review proposals; Discuss solutions to challenges
- **February:** Review calculation template; Refine calculation and risk factors

- **March:** Refine calculation and risk factors with sample/previous data to confirm the process; provide an outline to ePlan vendor; gather Overall Approval Committee to discuss changes and seek approval
- **April:** Discuss template and any adjustments Overall Approval Committee proposed
- **May:** Research and finalize data sources; make data requests
- **June:** Data pull; sign-off on data retrieval
- **July:** Training FPO/OCFO staff on risk calculations; proof of attendance
- **August:** LEA Notifications and Risk Analysis Access; Acknowledge or Appeal

## Every Student Succeeds Act (ESSA) Subcategory

### Subgroup Data: English Learners

**Definition:** The English learner subgroup risk flag = 1 for LEAs in which the number of English learners enrolled on Oct. 1 increased/decreased by 10% or more **and** by 2 or more students between FPO's EL Oct. 1 count and FPO's year-end data analysis in June. The data include students with the L and W English language background classifications who were enrolled in grades K-12 on Oct. 1, 2021, as of the pull dates.

**Example:** 30 students with the L and W English language background classification are reported as enrolled in grades K-12 on Oct. 1 when data are pulled from EIS in the fall for FPO's Oct. 1 count, but only 25 are reported as enrolled on Oct. 1 when FPO downloads data from EIS for its year-end analysis. The English learner flag = 1 because the percentage of English learners enrolled decreased by 16% **and** the number enrolled decreased by five.

**Fiscal or School Year:** FY22

**Points:** 20 points if an LEA does not meet the metric

**Contact:** [assigned FPO divisional coordinator](#) or [Trish.Kelly@tn.gov](mailto:Trish.Kelly@tn.gov)

### Subgroup Data: Students in Foster Care

**Definition:** The foster care subgroup risk flag = 1 for LEAs in which foster care students as a percentage of directly certified students are less than or equal to 10% of the state average.

**Example:** If foster care students as a percentage of directly certified average 2.4%, the foster care flag = 1 for LEAs in which foster care students as a percentage of directly certified are  $\leq 0.24\%$ . Foster care are students flagged with the FOS01-foster care classification and directly certified are students flagged with the J-direct certification of economic disadvantage classification. The data include students enrolled in grades P3-12 any time during the 2021-22 school year. Students with more than one enrollment count once per LEA.

**Fiscal or School Year:** FY22

**Points:** 20 points if an LEA does not meet the metric

**Contact:** [Jackie.Jacobson@tn.gov](mailto:Jackie.Jacobson@tn.gov), [assigned FPO divisional coordinator](#) or [Trish.Kelly@tn.gov](mailto:Trish.Kelly@tn.gov)

### Subgroup Data: Students Experiencing Homelessness

**Definition:** The homeless subgroup risk flag = 1 for LEAs in which homeless students as a percentage of directly certified students are less than or equal to 10% of the state average.

**Example:** If homeless students as a percentage of directly certified average 4.2%, the homeless flag = 1 for LEAs in which homeless students as a percentage of directly certified are  $\leq 0.42\%$ . Homeless students flagged with the H-homeless classification and directly certified are students flagged with the J-direct certification of economic disadvantage classification. The data include students enrolled in grades P3-12 any time during the 2021-22 school year. Students with more than one enrollment count once per LEA.

**Fiscal or School Year:** FY22

**Points:** 20 points if an LEA does not meet the metric

**Contact:** [Vanessa.Waters@tn.gov](mailto:Vanessa.Waters@tn.gov), [assigned FPO divisional coordinator](#), or [Trish.Kelly@tn.gov](mailto:Trish.Kelly@tn.gov)



### Subgroup Data: Immigrant Students

**Definition:** The immigrant subgroup risk flag = 1 for LEAs in which the country of birth was missing or identified as null, Puerto Rico, or U.S. for 10% or more immigrant students **and** two or more immigrant students at the end of the school year.

**Example:** *Immigrant students total 20, and two immigrant students have country of birth errors when data are pulled at the end of the school year. The immigrant flag = 1 because two or more immigrant students **and** 10% or more immigrant students have country of birth errors at the end of the school year. Immigrants are students for whom the immigrant field is "Yes" in EIS. The data include students enrolled in grades P3-12 any time during the 2021-22 school year. Students with more than one enrollment count once per LEA.*

**Fiscal or School Year:** FY22

**Points: 20 points** if an LEA does not meet the metric

**Contact:** [assigned FPO divisional coordinator](#) or [Trish.Kelly@tn.gov](mailto:Trish.Kelly@tn.gov)

### Subgroup Data: Migratory Students

**Definition:** The migratory subgroup risk flag = 1 for LEAs in which corrections needed in the I-migrant student classification affect 10% or more of total migratory records **and** total two or more at the end of the school year.

**Example:** *If, at the end of the school year, an LEA has one student correctly flagged with the I-migrant student classification, one student for whom the I-migrant classification should be added, and another for whom the I-migrant classification should be removed, the migrant flag = 1 because corrections needed total two **and** affect 67% of total migratory records (three). The I-migrant student classification corrections are available monthly in the migrant student lists posted on the TNMigrant website for migratory students enrolled in grades P3-12 any time during the 2021-22 school year.*

**Fiscal or School Year:** FY22

**Points: 20 points** if an LEA does not meet the metric

**Contact:** [assigned FPO divisional coordinator](#) or [Trish.Kelly@tn.gov](mailto:Trish.Kelly@tn.gov)

### Subgroup Data: Military Dependents

**Definition:** The military dependent subgroup risk flag = 1 for LEAs in which military dependents as a percentage of enrollment are less than or equal to 10% of the state average.

**Example:** *If military dependents as a percentage of enrollment average 1.2%, the military dependent flag = 1 for LEAs in which military dependents as a percentage of enrollment are  $\leq$  .12%. Military dependents are students flagged with the 4-active-duty military dependent classification, 5-national guard military dependent classification, or 6-reserve military dependent classification. The data include students enrolled in grades P3-12 any time during the 2021-22 school year. Students with more than one enrollment count once per LEA.*

**Fiscal or School Year:** FY22

**Points: 20 points** if an LEA does not meet the metric

**Contact:** [assigned FPO divisional coordinator](#) or [Trish.Kelly@tn.gov](mailto:Trish.Kelly@tn.gov)

### ESSA Complaints with Findings

**Definition:** When FPO receives complaints regarding ESSA program implementation, the applicable program coordinator investigates the complaint and programming components in question. If the investigation results in findings in the most recent completed fiscal year, the LEA receives the maximum number of points determined for this area.

**Fiscal or School Year:** FY22

**Points: 20 points** if an LEA has one or more complaints with findings

**Contact:** [assigned FPO divisional coordinator](#) or [Brinn.Obermiller@tn.gov](mailto:Brinn.Obermiller@tn.gov)

### ESSA Results-Based Monitoring Action Steps

**Definition:** LEAs with ESEA-related Results-Based Monitoring Findings of Non-Compliance or Corrections Needed from the most recent completed monitoring cycle receive points for this area.

**Fiscal or School Year:** FY22

**Points:** **2 points** per action step with a **maximum of 20 points**

**Source:** [ePlan.tn.gov](http://ePlan.tn.gov) > Results-Based Monitoring > FY22 > Monitoring Results – LEA Response

**Contact:** [assigned FPO divisional coordinator](#) or [Geneva.Taylor@tn.gov](mailto:Geneva.Taylor@tn.gov)

### ESSA Director Years of Experience

**Definition:** ESSA Directors must report their number of years of experience in this role within Tennessee upon submission of the consolidated funding application (CFA) each year.

**Fiscal or School Year:** FY23

**Points:** LEAs with an ESSA Director who has less than one year of experience in the role within the state of Tennessee receive **5 points**, between one and three years receive **2 points**, and with 3+ years **no points**.

**Source:** [ePlan.tn.gov](http://ePlan.tn.gov) > Search > Funding Applications > FY23 CFA > Contacts

**Contact:** [assigned FPO divisional coordinator](#) or [Geneva.Taylor@tn.gov](mailto:Geneva.Taylor@tn.gov)

### ESL Director Years of Experience

**Definition:** ESL Directors must report their years of experience in the role within Tennessee upon submission of the CFA each year.

**Fiscal or School Year:** FY23

**Points:** LEAs with an ESL Director who has less than one year of experience in the role within the state of Tennessee receive **5 points**, between one and three years receive **2 points**, and with 3+ years **no points**.

**Source:** [ePlan.tn.gov](http://ePlan.tn.gov) > Search > Funding Applications > FY23 CFA > Contacts

**Contact:** [assigned FPO divisional coordinator](#) or [Geneva.Taylor@tn.gov](mailto:Geneva.Taylor@tn.gov)

## ***Individuals with Disabilities Education Act (IDEA) Subcategory***

### **Annual Performance Report (APR): Final Score (%)**

**Definition:** Under the Individuals with Disabilities Education Act (IDEA) of 2004, states are required to compile both aggregate and LEA-level data addressing 17 indicators that measure implementation of special education programs. Targets for these indicators are collaboratively set by the department and stakeholder groups, including the Governor's Advisory Council for the Education of Students with Disabilities. The department submits an Annual Performance Report (APR) containing statewide data and targets for the 17 indicators to the federal government annually. A determination on the quality of the implementation of special education programs in the state is issued based on these data. Indicator data are also publicly reported at the LEA level, and determinations are made for each of these individual LEAs. Indicators provide information about identification and timely evaluation of students with disabilities (SWDs), educational environments of SWDs, achievement of SWDs, discipline of SWDs, involvement of parents of SWDs, and post-school outcomes of SWDs.

**Fiscal or School Year:** FFY20 (2020-21 SY)

**Points:** The inverse of the APR Final Score (%) (with a maximum of **50 points**).

**Example:** *If the Final Score (%) from an LEA's Local Determinations Data Matrix is 75.00%, the LEA receives 25 points. If the Final Score (%) from an LEA's Local Determinations Data Matrix is 96.00%, the LEA receives 4 points.*

**Source:** Click [here](#) to learn more about the Annual Performance Report. The FFY 2020 (2020-21 SY) matrix and historical matrices can be found in ePlan (ePlan.tn.gov > Search > FY22 LEA Doc Library > Annual Performance Report (APR) Local Determinations).

**Contact:** [assigned FPO divisional coordinator](#) or [Zachary.Stone@tn.gov](mailto:Zachary.Stone@tn.gov)

### **IDEA Complaints and Due Process Findings**

**Definition:** When the department's office of general counsel (OGC) receives complaints regarding IDEA program implementation, the applicable complaints investigator conducts a review of the program in question. If the review results in findings in the most recent completed fiscal year, the LEA receives the maximum number of points determined for this area.

**Fiscal or School Year:** FY22

**Points:** LEAs with **one or more complaints** with findings receive **25 points**.

**Contact:** [assigned FPO divisional coordinator](#) or [Taylor.Jenkins@tn.gov](mailto:Taylor.Jenkins@tn.gov)

### **Significant Disproportionality**

**Definition:** The Individuals with Disabilities Education Act (IDEA) section 618(d) requires states to collect and examine data to determine if significant disproportionality based on race and ethnicity is occurring in the state and the local educational agencies (LEAs) of the state with respect to:

- (A) Identification of children as children with disabilities, including the identification of children as children with disabilities in accordance with a particular impairment;
- (B) Placement in particular educational settings of such children; and
- (C) Incidence, duration, and type of disciplinary actions, including suspensions and expulsions.

**Fiscal or School Year:** SY 2018-19, SY 2019-20, and SY 2020-21 data were used for FY22 determinations.

**Points:** **4 points** per area of significant disproportionality (with a maximum of **20 points**)

**Source:** Click [here](#) to learn more about Significant Disproportionality. Determination letters, data displays, and appeal documentation can be found in ePlan (ePlan.tn.gov > Search > FY22 LEA Doc Library > Significant Disproportionality).

**Contact:** [assigned FPO divisional coordinator](#) or [Zachary.Stone@tn.gov](mailto:Zachary.Stone@tn.gov)

## IDEA Director Years of Experience

**Definition:** IDEA Directors must report their years of experience in the role within Tennessee upon submission of the CFA each year.

**Fiscal or School Year:** FY23

**Points:** LEAs with an IDEA Director who has less than one year of experience in the role within the state of Tennessee receive **5 points**, between one and three years receive **2 points**, and with 3+ years **no points**.

**Source:** [ePlan.tn.gov](http://ePlan.tn.gov) > Search > Funding Applications > FY23 CFA > Contacts

**Contact:** [assigned FPO divisional coordinator](#)

## IDEA Results-Based Monitoring Actions Steps

**Definition:** LEAs with IDEA-related Results-Based Monitoring Findings of Non-Compliance or Corrections Needed in the Students with Disabilities, Gifted Students, IDEA Funded Pre-K, Students with Disabilities Detained in Jails, and Transition pages from the most recent completed monitoring cycle receive points.

**Fiscal or School Year:** FY22

**Points:** **2 points** per action step with a **maximum of 20 points**.

**Source:** [ePlan.tn.gov](http://ePlan.tn.gov) > Results-Based Monitoring > FY22 > Monitoring Results – LEA Response

**Contact:** [assigned FPO divisional coordinator](#)

## IEP Monitoring Risk

**Definition:** LEAs with IEP Monitoring Results requiring corrective actions, factored with the LEA's self-identification of items of non-compliance from the most recent completed monitoring cycle.

**Fiscal or School Year:** FY22

**Points:** 0-4.99% of non-compliance, **0 points**; 5-9.99%, **10 points**; 10-19.99%, **30 points**; above 20%, **50 points** with a **maximum of 50 points**.

**Source:** [Easy IEP](#) > Compliance Monitoring > Monitoring Cohort (SEA Findings Column, Total Findings)

**Contact:** [Laura.Dunn@tn.gov](mailto:Laura.Dunn@tn.gov), [Robert.Taylor@tn.gov](mailto:Robert.Taylor@tn.gov), or [Geneva.Taylor@tn.gov](mailto:Geneva.Taylor@tn.gov)

## New: Isolation/Restraint Incidents

**Definition:** LEAs provide data of isolation and restraint incidents to the department. Each year, LEAs certify Restraint and Isolation Report data as one of the End of Year Data Reports for Students with Disabilities. The department then flags incidents in the report for the following types of data quality inconsistencies:

- duplicate entries—multiple incidents with the same student, date, time, and incident type.
- missing date or time of parent notification
- date or time of parent notification occurring before the incident date/time
- student or staff death reported when no death occurred
- missing number of staff “Not Trained/Total Staff” entered as “0/0”
- isolation that exceeds 120 minutes
- restraint that exceeds 15 minutes
- incidents reported during non-school hours

**Fiscal or School Year:** SY 2020-21

**Points:** **0 points** if an LEA had 0% of incidents flagged; **3 points** if an LEA had less than 10% of incidents flagged; **5 points** if an LEA had more than 10% of incidents flagged (**maximum of 5 points**)

**Source:** View the [FAQ on Restraint and Isolation](#) or the Isolation and Restraint User Manual in EasyIEP.

**Contact:** [Adam.Rollins@tn.gov](mailto:Adam.Rollins@tn.gov) or [Zachary.Stone@tn.gov](mailto:Zachary.Stone@tn.gov)

## Perkins V

### CTE PD Attendance

**Definition:** The SEA offers four meetings annually, and CTE directors are expected to attend. LEAs are also expected to send a representative to regional CTE meetings which may vary in frequency in each region.

**Fiscal or School Year:** FY22

**Points:** LEAs with a CTE Director or representative present at less than 75% of state quarterly meetings receive **10 points**; LEAs with 75% of regional meetings published on the state-wide calendar, it receives **10 points** with a **maximum of 20 points**.

**Contact:** assigned CTE/CORE office contact

### CTE Results-Based Monitoring Actions Steps

**Definition:** LEAs with Perkins-related Results-Based Monitoring Findings of Non-Compliance or Corrections Needed from the most recent completed monitoring cycle receive points for this area.

**Fiscal or School Year:** FY22

**Points:** **2 points** per action step with a **maximum of 20 points**.

**Source:** ePlan.tn.gov > CTE Results-Based Monitoring > FY22 > Monitoring Results – LEA Response

**Contact:** [Michael.Gateley@tn.gov](mailto:Michael.Gateley@tn.gov)

### CTE Drawdown

**Definition:** Quarterly drawdown of Perkins Basic funds at a rate of 20-25% or greater per quarter is expected so that LEAs spend down funds on fund generators (students who generated funds).

**Fiscal or School Year:** FY21

**Points:** LEAs with less than an average of 20% drawdown per quarter receive **15 points**. (By Oct. 31: 20% or greater; By Jan. 31, Quarter 2: 45% or greater; By April 30, Quarter 3: 70% or greater; By June 30, Quarter 4: 100% [up to a \$100 variance])

**Source:** ePlan.tn.gov > Search > Reimbursement Requests > FY22 Perkins Basic

**Contact:** assigned CTE/CORE office contact

### CTE Director Years of Experience

**Definition:** CTE Directors must report their number of years of experience in this role within the state of Tennessee upon submission of the Perkins Basic funding application each year.

**Fiscal or School Year:** FY23

**Points:** LEAs with a CTE Director who has less than one year of experience in the role within the state of Tennessee receive **5 points**, between one and three years receive **2 points**, and with 3+ years **no points**.

**Source:** ePlan.tn.gov > Search > Funding Applications > FY23 Perkins Basic > Eligibility > CTE Director Employment Matrix

**Contact:** assigned CTE/CORE office contact

### CTE PD Allocation

**Definition:** LEAs must allocate at least five percent of the Perkins Basic allocation to professional development aligned to the Tennessee Perkins V State Plan (72130-189 & -524, and 72230-189, -355, & -524).

**Fiscal or School Year:** FY23

**Points:** LEAs with less than five percent of its Perkins Basic allocation allocated to PD receive **5 points**.

**Source:** ePlan.tn.gov > Search > Funding Applications > FY23 Perkins Basic > Budget

**Contact:** assigned CTE/CORE office contact

## **Fiscal**

### **Single Audit Findings or Single Audit Not Required (>\$750k)**

**Definition:** A single audit provides assurance to the U.S. government as to the management and use of the funds by the recipient, and the audit is completed by an independent auditor. As a companion to Single Audit (formerly A-133) Findings, this category captures LEAs receiving less than \$750K in federal funds. Typically, the single audit provides assurance to the U.S. government as to the management and use of the funds by the recipient, and the audit is completed by an independent accountant.

**Fiscal or School Year:** FY21

**Points:** If an LEA has one or more finding, it receives **15 points**.

**Source:** <https://www.comptroller.tn.gov/office-functions/la/reports/audit-reports.html>

### **Fiscal Monitoring Findings**

**Definition:** LEAs that are identified during the Comptroller's Annual Report as exhibiting financial risk.

**Fiscal or School Year:** FY21

**Points:** LEAs with a finding for funds up to \$49,999.99 receive **5 points** per finding, between \$50,000.00 and \$99,999.99 receive **10 points** per finding, and \$100,000.00 or greater receive **15 points**.

**Source:** Tennessee Department of the Treasury Comptroller Annual Report

**Contact:** [Maryanne.Durksi@tn.gov](mailto:Maryanne.Durksi@tn.gov)

### **Central Finance Office**

**Definition:** LEAs that use a Central Finance office are at additional risk because of a lack of fiscal control and county/city finance teams risk misunderstanding guidance around allowability with federal funds granted by the U.S. Department of Education.

**Fiscal or School Year:** FY23

**Points:** If an LEA uses a central finance office, it receives **10 points**.

**Contact:** [Maryanne.Durksi@tn.gov](mailto:Maryanne.Durksi@tn.gov)

### **IDEA Excess Carryover**

**Definition:** LEAs that carry over 50% or greater from the previous fiscal year in either the IDEA, Part B or IDEA, Preschool grants are at greater risk of not spending funds in a timely and appropriate manner.

**Fiscal or School Year:** FY21

**Points:** LEAs with 50% or greater carryover receive **10 points**.

**Source:** [ePlan.tn.gov](http://ePlan.tn.gov) > Search > Funding Applications > FY22 CFA > Sections > Reimbursements

**Contact:** [Tracey.Hawk@tn.gov](mailto:Tracey.Hawk@tn.gov)

### **Fiscal Representative and Fiscal Update Role Same in ePlan**

**Definition:** The fiscal representative and Fiscal Update roles were listed as the same person/people.

**Fiscal or School Year:** FY23

**Points:** **10 points** if the same individual holds the fiscal representative and update roles as of June 2022.

**Source:** [ePlan.tn.gov](http://ePlan.tn.gov) > Search > Funding Applications > FY23 CFA > Contacts

**Contact:** [Geneva.Taylor@tn.gov](mailto:Geneva.Taylor@tn.gov)

### ESSER 1.0 Award

**Definition:** The total allocation allotted to an LEA in the ESSER Application.

**Fiscal or School Year:** FY21

**Points:** 1 point per million dollars with a **maximum of 10 points**.

**Source:** ePlan.tn.gov > Search > Funding Applications > FY21 ESSER > Allocations

**Contact:** [Tracey.Hawk@tn.gov](mailto:Tracey.Hawk@tn.gov)

### ESSER 2.0 Award

**Definition:** The total allocation allotted to an LEA in the ESSER 2.0 Application.

**Fiscal or School Year:** FY21

**Points:** 1 point per million dollars with a **maximum of 10 points**.

**Source:** ePlan.tn.gov > Search > Funding Applications > FY22 ESSER 2.0 > Allocations

**Contact:** [Tracey.Hawk@tn.gov](mailto:Tracey.Hawk@tn.gov)

### ESSER 3.0 Award

**Definition:** The total allocation allotted to an LEA in the ESSER 3.0 Application.

**Fiscal or School Year:** FY22

**Points:** 1 point per million dollars with a **maximum of 10 points**.

**Source:** ePlan.tn.gov > Search > Funding Applications > FY23 ESSER 3.0 > Allocations

**Contact:** [Tracey.Hawk@tn.gov](mailto:Tracey.Hawk@tn.gov)

### Updated: ESSER 1.0 Reimbursement Requests (RR) – 80% Expended

**Definition:** The total amount of reimbursement requests compared to 80% of the allocation.

**Fiscal or School Year:** FY22

**Points:** **Maximum of 10 points** if at least 80% the allocation has not been expended as of June 30, 2022.

**Source:** ePlan.tn.gov > Search > Funding Applications > FY22 ESSER 2.0 > Allocations

**Contact:** [Tracey.Hawk@tn.gov](mailto:Tracey.Hawk@tn.gov) or [George.Amin@tn.gov](mailto:George.Amin@tn.gov)

### ESSER 2.0 Monthly Reimbursement Requests (RR)

**Definition:** The total allocation allotted to an LEA in the ESSER 2.0 Application.

**Fiscal or School Year:** FY22

**Points:** 5 points per month without RR through June 30 (**maximum of 10 points**).

**Source:** ePlan.tn.gov > Search > Funding Applications > FY22 ESSER 2.0 > Allocations

**Contact:** [Tracey.Hawk@tn.gov](mailto:Tracey.Hawk@tn.gov) or [George.Amin@tn.gov](mailto:George.Amin@tn.gov)

### New: ESSER 2.0 Reimbursement Requests (RR) – 50% Expended

**Definition:** The total amount of reimbursement requests compared to half the allocation.

**Fiscal or School Year:** FY22

**Points:** **Maximum of 10 points** if at least half the allocation has not been expended as of June 30, 2022.

**Source:** ePlan.tn.gov > Search > Funding Applications > FY22 ESSER 1.0 > Allocations

**Contact:** [Tracey.Hawk@tn.gov](mailto:Tracey.Hawk@tn.gov) or [George.Amin@tn.gov](mailto:George.Amin@tn.gov)

### ESEA Bookkeeper Years of Experience

**Definition:** ESSA Bookkeepers must report their years of experience in the role within Tennessee upon submission of the CFA each year.

**Fiscal or School Year:** FY23

**Points:** LEAs with an ESSA Bookkeeper who has less than one year of experience in the role within the state of Tennessee receive **5 points**, between one and three years receive **2 points**, and with 3+ years **no points**.

**Source:** [ePlan.tn.gov](http://ePlan.tn.gov) > Search > Funding Applications > FY23 CFA > Contacts

**Contact:** [Geneva.Taylor@tn.gov](mailto:Geneva.Taylor@tn.gov)

### IDEA Bookkeeper Years of Experience

**Definition:** IDEA Bookkeepers must report their years of experience in the role within Tennessee upon submission of the CFA each year.

**Fiscal or School Year:** FY23

**Points:** LEAs with an IDEA Bookkeeper who has less than one year of experience in the role within the state of Tennessee receive **5 points**, between one and three years receive **2 points**, and with 3+ years **no points**.

**Source:** [ePlan.tn.gov](http://ePlan.tn.gov) > Search > Funding Applications > FY23 CFA > Contacts

**Contact:** [Geneva.Taylor@tn.gov](mailto:Geneva.Taylor@tn.gov)

### CFO/Treasurer Experience

**Definition:** CFOs/Treasurers must report their years of experience in the role within Tennessee upon submission of the CFA each year.

**Fiscal or School Year:** FY23

**Points:** LEAs with a CFO/Treasurer who has less than one year of experience in the role within the state of Tennessee receive **5 points**, between one and three years receive **2 points**, and with 3+ years **no points**.

**Source:** [ePlan.tn.gov](http://ePlan.tn.gov) > Search > Funding Applications > FY23 CFA > Contacts

**Contact:** [Geneva.Taylor@tn.gov](mailto:Geneva.Taylor@tn.gov)

### CFA Preliminary Award

**Definition:** The total allocation allotted to an LEA in the Consolidated Funding Application.

**Fiscal or School Year:** FY23

**Points:** **1 point per million** dollars with a **maximum of 5 points**.

**Source:** [ePlan.tn.gov](http://ePlan.tn.gov) > Search > Funding Applications > FY23 CFA > Allocations

**Contact:** [Tracey.Hawk@tn.gov](mailto:Tracey.Hawk@tn.gov) or [George.Amin@tn.gov](mailto:George.Amin@tn.gov)

### Perkins V Basic Preliminary Allocation

**Definition:** The total allocation allotted to an LEA in the Perkins Basic application.

**Fiscal or School Year:** FY23

**Points:** **1 point** for receiving up to \$30,000, **2 points** for \$30,001 to \$60,000, **3 points** for \$60,001 to \$100,000, **4 points** for \$100,001 to \$150,000, and **5 points** for more than \$150,000 dollars with a **maximum of 5 points**.

**Source:** [ePlan.tn.gov](http://ePlan.tn.gov) > Search > Funding Applications > FY23 Perkins Basic > Allocations

**Contact:** [Tracey.Hawk@tn.gov](mailto:Tracey.Hawk@tn.gov) or [George.Amin@tn.gov](mailto:George.Amin@tn.gov)



### **IDEA Drop Dead/Release of Funds**

**Definition:** LEAs that let funds in excess of \$100 drop dead (revert to U.S. Treasury) or LEAs that released funds back to the department.

**Fiscal or School Year:** FY20

**Points: 5 points** if an LEA drops or releases \$100 or more in IDEA funds.

**Contact:** [Tracey.Hawk@tn.gov](mailto:Tracey.Hawk@tn.gov) or [George.Amin@tn.gov](mailto:George.Amin@tn.gov)

### **ePlan Final Budget Deadline**

**Definition:** LEAs that missed the final budget deadline for the CFA or state budget deadlines are at risk of not spending allocations on fund generators or reverting funds.

**Fiscal or School Year:** FY21

**Points: 5 points** if an LEA missed the final budget or CFA deadline.

**Source:** [ePlan.tn.gov](http://ePlan.tn.gov) > Search > Funding Applications > FY21 > (Appropriate Funding Application)

**Contact:** [Maryanne.Durski@tn.gov](mailto:Maryanne.Durski@tn.gov)

### **New: State Funds FER Deadline**

**Definition:** LEAs must complete the state funds final expenditure report by the October 1 deadline to ensure all year-end reports are completed in a timely manner as stated in the statute.

**Fiscal or School Year:** FY21

**Points: 5 points** if an LEA missed the state funds FER deadline.

**Source:** [ePlan.tn.gov](http://ePlan.tn.gov) > Search > Funding Applications > FY21 > (Appropriate Funding Application)

**Contact:** [Maryanne.Durski@tn.gov](mailto:Maryanne.Durski@tn.gov)

## Cross-Cutting

### CSI Schools

**Definition:** Please see the School Accountability website below.

**Fiscal or School Year:** Please see the School Accountability website below.

**Points: 15 points** if there is a CSI School identified in the LEA on the School Accountability website.

**Source:** <https://www.tn.gov/education/data/accountability/2021-school-accountability.html>

**Contact:** [assigned FPO divisional coordinator](#)

### Priority Schools

**Definition:** Please see the School Accountability website below.

**Fiscal or School Year:** Please see the School Accountability website below.

**Points: 20 points** if there is a Priority School identified in the LEA on the School Accountability website.

**Source:** <https://www.tn.gov/education/data/accountability/2021-school-accountability.html>

**Contact:** [assigned FPO divisional coordinator](#)

### In Need of Improvement Schools

**Definition:** Please see the School Accountability website below.

**Fiscal or School Year:** Please see the School Accountability website below.

**Points: 15 points** if there is a TSI or ATSI School identified in the LEA on the School Accountability website.

**Source:** <https://www.tn.gov/education/data/accountability/2021-school-accountability.html>

**Contact:** [assigned FPO divisional coordinator](#)

### ESEA/IDEA Director Same Person

**Definition:** The same person with the responsibilities of both the ESSA and IDEA programs.

**Fiscal or School Year:** FY23

**Points: 10 points** if the ESEA and IDEA director have the same name listed in the Address Book and/or CFA.

**Source:** ePlan.tn.gov > Search > Funding Applications > FY23 CFA > Contacts

**Contact:** [assigned FPO divisional coordinator](#)

### TN OCR Findings

**Definition:** If the Tennessee Department of Education, Office of Civil Rights, determined that an LEA lacked documentation and proof to comply with applicable regulations, the LEA is required to take action to resolve the non-compliance.

**Fiscal or School Year:** FY22

**Points: 10 points** if the LEA received an OCR complaint resulting in a finding of non-compliance.

**Contact:** [assigned FPO divisional coordinator](#) or [Shaundraya.Hersey@tn.gov](mailto:Shaundraya.Hersey@tn.gov)

### Director of Schools Years of Experience

**Definition:** Directors of Schools must report their number of years of experience in this role within the state of Tennessee upon submission of the CFA each year.

**Fiscal or School Year:** FY23

**Points:** LEAs with a Director of Schools who has less than one year of experience in the role within the state of Tennessee receive **5 points**, between one and three years receive **2 points**, and with 3+ years **no points**.

**Contact:** [assigned FPO divisional coordinator](#)

## ***Years Since Last Monitored via Level 3 (Formerly On-Site)***

### **Updated: ESEA/IDEA/ESSER Program Monitoring Years**

**Definition:** LEAs are monitored via one of three results-based monitoring levels, and LEAs that have not been monitored on-site (or virtually on-site) receive risk points for each year not on-site monitored.

**Fiscal or School Year:** through FY22

**Points:** **5 points** for each year since last on-site monitored with **no limit on maximum points**.

**Contact:** [assigned FPO divisional coordinator](#)

### **Updated: Perkins V Program Monitoring Years**

**Definition:** LEAs are monitored via one of three results-based monitoring levels, and LEAs that have not been monitored on-site (or virtually on-site) receive risk points for each year not on-site monitored.

**Fiscal or School Year:** FY20-FY22

**Points:** **5 points** for each year since last on-site monitored with **no limit on maximum points**.

*For this category, only embedded Results-Based Monitoring via ePlan is considered.*

**Contact:** [Michael.Gateley@tn.gov](mailto:Michael.Gateley@tn.gov)

### **Updated: Fiscal Monitoring Years**

**Definition:** LEAs are monitored based on risk, and LEAs that have not been monitored on-site (or virtually on-site) receive risk points for each year not on-site monitored.

**Fiscal or School Year:** through FY22

**Points:** LEAs receive **5 points** for each year since last on-site monitored with **no limit on maximum points**.

**Contact:** [Maryanne.Durski@tn.gov](mailto:Maryanne.Durski@tn.gov)

# Risk Analysis Process and Business Rules

For the FY23 Risk Analysis, all subtotals are added together to determine a total score for LEAs. LEAs are then sorted by score (from greatest to least) to determine which level of monitoring each LEA must complete. The following business rules are followed in sequence to determine the level via which each LEA is monitored.

## Results-Based Monitoring Risk Analysis Business Rules:

1. At the department’s discretion, LEAs that were focus monitored in the most recent fiscal year (FY22) complete Level 3 Results-Based Monitoring for the impacted grant(s) regardless of score.
2. LEAs that completed Level 3 (formerly on-site) Results-Based Monitoring in the previous fiscal year are excluded from Level 3 and assigned Level 1 Results-Based Monitoring (with the exception of the four largest LEAs).
3. The four largest LEAs (Davidson, Hamilton, Knox, and Shelby) participate in a two-year rotation cycle between Level 2 and Level 3 Results-Based Monitoring.
4. As other state agencies are not subject to the same reporting and data collection, the Tennessee Department of Children’s Services, Tennessee Public Charter School Commission, and Tennessee Department of Corrections participate in Level 3 Results-Based Monitoring at least every three years beginning in the 2022-23 school year.
5. State-ran schools (Achievement School District, Alvin C. York Institute, Tennessee School for the Blind, Tennessee School for the Deaf, and West Tennessee School for the Deaf) participate in Level 3 Results-Based Monitoring at least every three years beginning in the 2022-23 school year.
6. If eligible, the LEA with the highest score in the ESEA subcategory is identified for Level 3 monitoring.
7. If eligible, the LEA with the highest score in the IDEA subcategory is identified for Level 3 monitoring.
8. If eligible, the LEA with the highest score in the Perkins subcategory is identified for Level 3 monitoring.
9. If eligible, the LEA with the highest score in the Fiscal subcategory is identified for Level 3 monitoring.
10. LEAs not on a rotation cycle that rise to an elevated level for a third year in a row are promoted to Level 3 Results-Based Monitoring.
  - a. To allow for capacity if this occurs, the LEA with the lowest significant risk is reassigned to Level 2 Results-Based Monitoring.
11. At least 10% of LEAs receiving funds via the CFA are identified for (virtual) Level 3 Results-Based Monitoring.
12. Between Level 3 and Level 2 Results-Based Monitoring, at least 20% of LEAs are identified.
13. A random selection of one or more LEAs to participate in a Level 3 Results-Based Monitoring may occur prior to determining the Level 2 and Level 1 Results-Based Monitoring identification.
14. A random selection of one or more LEAs to participate in a Level 2 Results-Based Monitoring may occur prior to determining the Level 1 Results-Based Monitoring identification.
15. All remaining LEAs are identified for Level 1 Results-Based Monitoring.



### School Identification Business Rules:

The following business rules are followed to identify **schools** for monitoring purposes.

Top 20 Most Populous LEAs	All Other LEAs
3 public schools participating in Title I 1 charter (if applicable) 1 non-public (if applicable) * 1 virtual school (if applicable)	2 public schools participating in Title I 1 charter (if applicable) 1 non-public (if applicable) * 1 virtual school (if applicable)

1. Refer to the prior three years of monitoring schedules to determine schools are not duplicated unless a school presents as having high risk and/or identified as needing follow-up monitoring.
  - a. Divisional coordinators notify the compliance coordinator and/or the senior director of compliance if they recommend schools be selected a second time.
2. Choose schools from the *School Eligibility* page in the previous CFA in ePlan in the following order:
  - a. Title I Schools only (*Service [Column E] marked as SW, SW (waiver), SW (gf) or TA, TA (gf)*)
  - b. One from *School Designation* column (if applicable) (*Priority, TSI, CSI, Reward*)
  - c. From those with a school designation (if applicable), choose a school with a high poverty count.
  - d. If none stand out, review subgroup count information by schools (EL, SWD, Homeless, Foster Care, etc.) to decide which schools give the best overview of the LEA's work.
  - e. Consider schools serving various grade spans from different clusters when possible.
  - f. If applicable, choose a charter school using the priorities above.
  - g. If applicable, choose a non-public school participating in Title I and most other titles and IDEA.
  - h. If applicable, choose a virtual school participating in Title I or other titles or federal grants.

The following business rules are followed to identify **schools** for Perkins program monitoring purposes.

All LEAs
A minimum of 20% or two high schools receiving Perkins V funding (whichever is greater)

1. Refer to the prior three years of monitoring schedules to determine schools are not duplicated, unless a school presents as having high risk and/or identified as needing follow-up monitoring, or there are not enough eligible schools in the particular LEA to vary the school selection.
2. Choose schools from in the following order:
  - a. High schools only
  - b. One from School Designation column (if applicable) (*Priority, TSI, CSI, Reward*)
  - c. From those with a school designation (if applicable), choose a school with a high poverty count.
  - d. If none stand out, review subgroup count information by schools (EL, SWD, Homeless, Foster Care, etc.) to help decide which schools give the best overview of the LEA's work.
  - e. Consider schools serving various grade spans from different clusters when possible.

# Resources and Points of Contact

## Resources:

[FPO Assigned Divisional Coordinator Map](#)

[OCFO Assigned Consultant Map](#)

[ePlan TDOE Resources: Monitoring Folder](#)

## Points of Contact:

[FPO.Monitoring@tn.gov](mailto:FPO.Monitoring@tn.gov)

**Geneva Taylor**, *Senior Director of Compliance*

[Geneva.Taylor@tn.gov](mailto:Geneva.Taylor@tn.gov)

(615) 580-2039

**Teri Manning**, *ESSA Compliance Manager*

[Teri.Manning@tn.gov](mailto:Teri.Manning@tn.gov)

(901) 422-1749

**Laura Dunn**, *IDEA Compliance Manager*

[Laura.Dunn@tn.gov](mailto:Laura.Dunn@tn.gov)

(615) 961-1331

**Michael Gateley**, *Perkins Compliance Manager*

[Michael.Gateley@tn.gov](mailto:Michael.Gateley@tn.gov)

(931) 349-7097

**Rob Taylor**, *Lead Monitoring Specialist*

[Robert.Taylor@tn.gov](mailto:Robert.Taylor@tn.gov)

(615) 829-9465

**Vacant**, *East TN Monitoring Specialist*

[Robert.Taylor@tn.gov](mailto:Robert.Taylor@tn.gov)

(615) 829-9465

**Stan Cook**, *Middle TN Monitoring Specialist*

[Stanley.Cook@tn.gov](mailto:Stanley.Cook@tn.gov)

(615) 772-3253

**LaTrese Watson**, *West TN Monitoring Specialist*

[LaTrese.Watson@tn.gov](mailto:LaTrese.Watson@tn.gov)

(615) 486-8022