

Mitigating Risk: Reducing Non-Compliance Using Risk Analysis Data

Geneva Taylor | Senior Director of Compliance
Michael Gateley | Perkins Compliance Manager

Federal Programs & Oversight
Aug. 22-24, 2023





BEST FOR
ALL

We will set all students on a path to success.

ACADEMICS

ALL TENNESSEE STUDENTS WILL HAVE
ACCESS TO A HIGH-QUALITY EDUCATION,
NO MATTER WHERE THEY LIVE

STUDENT READINESS

TENNESSEE PUBLIC SCHOOLS WILL BE
EQUIPPED TO SERVE THE ACADEMIC
AND NON-ACADEMIC NEEDS OF ALL
STUDENTS IN THEIR CAREER PATHWAYS

EDUCATORS

TENNESSEE WILL SET A NEW PATH FOR
THE EDUCATION PROFESSION AND BE
THE TOP STATE IN WHICH TO BECOME AND
REMAIN A TEACHER AND LEADER FOR ALL



Agenda

- Overview
- Every Student Succeeds Act (ESSA) Sub-Category
- Individuals with Disabilities Education Act (IDEA) Sub-Category
- Perkins V Sub-Category
- Fiscal Sub-Category
- Cross-Cutting Sub-Category
- Years Since Last Monitored Sub-Category
- Common Questions
- Business Rules



Overview

Why is a risk analysis required?

- The Tennessee Department of Education (department) must conduct a risk analysis according to **2 C.F.R. § 200.331** [Education Department General Administrative Regulations (EDGAR) p. 147], evaluate each subrecipient's [the local education agency (LEA)] 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 [Office of the Chief Financial Officer (OCFO)] and programmatic [Federal Programs and Oversight (FPO)] reports, ensuring corrective action (Monitoring Results), and issuing a management decision on audit findings (approval/non-approval).
- The risk analysis determines the tier of monitoring for each LEA.



Common Terms

- **Level:** One of three Results-Based Monitoring (RBM) processes
 - **Level 3:** Monitoring for LEAs earning **significant** risk on the risk analysis (at least 10%)
 - **Level 2:** Monitoring tier for LEAs earning **elevated** risk on risk analysis (at least 10%)
 - **Level 1:** Monitoring tier for LEAs earning a **low** risk on the risk analysis (all remaining LEAs)
- **Risk Analysis:** evaluation of each LEA's risk of non-compliance for purposes of monitoring
 - **Risk Analysis Guide:** data elements, business rules, and processes that outline the risk analysis



How does the risk analysis work?

- **ESSA**
- **IDEA**
- **Perkins V**
- **Finance**
- **Cross-Cutting/Other**
- **Years Since Last Level 3 (formerly on-site) Monitored**
 - Years that included closures due to COVID-19 count.



ESSA Sub-Category

ESSA

- Subgroup Data
- Complaints w/ Findings
- WIDA Growth Rates
- Graduation Rates (Homeless & Foster)
- RBM Results
- Director Years of Experience [ESSA & English as a Second Language (ESL)]





Changes/Improvements in FY24

- All subgroup metrics now have a maximum of 10 points each.
- New categories were added (all max 15 points):
 - WIDA Growth Rate
 - Foster Care Graduation Rate
 - Homeless Graduation Rate
- RBM Actions now include ESSA-related Non-Traditional Educational Programs (NEP) results.



Subgroup Data: English Learners



1

Definition

Number of English learners (ELs) increased/decreased by 10% or more and by 2 or more students between Oct. 1 count and year-end data analysis in June.



2

Risk

0 points if LEA meets metric (no risk).

Max of 10 points if the LEA does not meet the metric.



3

Significance

When populations increase or decrease, **funding, staffing, and program quality are often impacted.**



4

Mitigation Strategy

Ensure data accuracy and compare Student Information System (SIS) to FPO Data Reports shared by Trish Kelly.

Subgroup Data: Students in Foster Care



1

Definition

Students in Foster Care are less than or equal to 10% of the state average in the LEA.



2

Risk

0 points if LEA meets metric (no risk).

Max of 10 points if the LEA does not meet the metric.



3

Significance

If LEA identification varies greatly from SEA average, the **LEA is at risk for under-identifying students** in this population.



4

Mitigation Strategy

Ensure data accuracy and compare SIS to FPO Data Reports shared by Trish Kelly.

Subgroup Data: Students Experiencing Homelessness



1

Definition

Students Experiencing Homelessness are less than or equal to 10% of the state average in the LEA.



2

Risk

0 points if LEA meets metric (no risk).

Max of 10 points if the LEA does not meet the metric.



3

Significance

When populations increase or decrease, **funding, staffing, and program quality are often impacted.**



4

Mitigation Strategy

Ensure data accuracy and compare SIS to FPO Data Reports shared by Trish Kelly.

Subgroup Data: Immigrant Students



1

Definition

Immigrant students for 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.



2

Risk

0 points if LEA meets metric (no risk).

Max of 10 points if the LEA does not meet the metric.



3

Significance

When data is incorrectly keyed, **funding, staffing, and program quality are often impacted.**



4

Mitigation Strategy

Ensure data accuracy and compare SIS to FPO Data Reports shared by Trish Kelly.

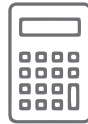
Subgroup Data: Migratory Students



1

Definition

Migratory students in which corrections needed in the migrant student classification affect 10% or more **and** two or more students at the end of the school year.



2

Risk

0 points if LEA meets metric (no risk).

Max of 10 points if the LEA does not meet the metric.



3

Significance

When data is incorrectly keyed, **funding, staffing, and program quality are often impacted.**



4

Mitigation Strategy

Ensure data accuracy and compare SIS to FPO Data Reports shared by Trish Kelly.

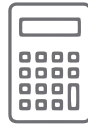
Subgroup Data: Military Dependents



1

Definition

Students identified as Military Dependents are less than or equal to 10% of the state average in the LEA.



2

Risk

0 points if LEA meets metric (no risk).

Max of 10 points if the LEA does not meet the metric.



3

Significance

If data is incorrectly keyed, **data collection at the student level is non-compliant with federal requirements.**



4

Mitigation Strategy

Ensure data accuracy and compare SIS to FPO Data Reports shared by Trish Kelly.

ESSA Complaints with Findings



1

Definition

If a complaint that is investigated results in findings of non-compliance.



2

Risk Points

0 if the LEA has no complaints with findings.

20 points if the LEA has one or more complaints with findings.



3

Significance

If students do not receive benefits in programs for which they are eligible, **the LEA is at further risk of non-compliance in other areas.**



4

Mitigation Strategy

LEAs must **work with parents, families, non-public schools, and other entities to ensure program implementation** positively impacts eligible students.

WIDA Growth Rate



1

Definition

English Learners meeting the WIDA growth standard is less than or equal to 25% and 10 or more English learners have test scores for two years.



2

Risk Points

0 points if LEA meets metric (no risk).

Max of 15 points if the LEA does not meet the metric.



3

Significance

Lack of growth rate indicates program quality concerns and/or non-compliance with federal law and state board rule.



4

Mitigation Strategy

ESL teachers and ESL directors should monitor programs regularly, conduct needs assessments, update ILPs, and adjust strategies based on student need.

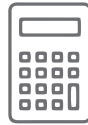
Foster Care Graduation Rate



1

Definition

Graduation rate for foster care students is less than or equal to 36% **and** the foster care graduation cohort includes five or more students.



2

Risk Points

0 points if LEA meets metric (no risk).

Max of 15 points if the LEA does not meet the metric.



3

Significance

Students in foster care at any time in high school are less likely to graduate than their peers.



4

Mitigation Strategy

Prioritizing student's needs (credit recovery, transcript reviews, supplemental supports) increases likelihood of graduation.

Homeless Graduation Rate



1

Definition

Graduation rate for students experiencing homelessness is less than or equal to 44% **and** the foster care graduation cohort includes five or more students.



2

Risk Points

0 points if LEA meets metric (no risk).

Max of 15 points if the LEA does not meet the metric.



3

Significance

Students experiencing homelessness are more transient than peers, and more likely to need additional supports to graduate.



4

Mitigation Strategy

Accurately identify student needs; provide supplemental services (backpack programs, Significances to community stakeholders for resource assistance), reduce barriers to CTE programs and extra-curriculars by waiving fees, providing school supplies, etc.

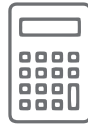
All Monitoring Action Steps



1

Definition

LEAs with Findings of Non-Compliance or Corrections Needed, and applicable JDC/N&D results, from FY23 monitoring.



2

Risk Points

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



3

Significance

Risk from previous years increases likelihood of risk in subsequent years.



4

Mitigation Strategy

Review previous monitoring results, ensure procedures and policies match, keep documentation.

All Experience for Directors, Bookkeepers, etc.



1

Definition

Directors must report years of experience in the role within Tennessee upon submission of the applicable funding application each year.



2

Risk Points

Director who has
3+ years: 0 points

1-3 years: 2 points

>1 year: 5 points



3

Significance

Inheriting work, learning a new role, and managing many requirements creates risk of non-compliance.



4

Mitigation Strategy

Don't assume inherited work was correct; keep documentation; reach out for support from oversight coordinators.

IDEA Sub-Category

IDEA

- Annual Performance Report (APR)
- IDEA Complaints w/ Findings
- Significant Disproportionality
- Director Years of Experience
- RBM Results
- Individualized Education Plan (IEP) Results
- Isolation/Restraint Incidents





Changes/Improvements in FY24

- No new categories
- Adjusted risk points for several categories
- Updated Isolation/restraint incident times



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



1

Definition

Inverse of the APR score



2

Risk Points

Inverse of APR Final Score (%) with a **maximum of 50 points**.



3

Significance

Missing indicator targets increases risk of non-compliance for students with disabilities.



4

Mitigation Strategy

Review APR manual and data, attend relevant PD, ensure accurate data collection, IEP meetings, etc.

IDEA Complaints Findings and Due Process Final Orders



1

Definition

When department receives IDEA program complaints, conducts a review, and review results in findings.



2

Risk Points

1 finding, 5 points;

2 findings, 15 points;

3 or more findings, maximum of 50 points.



3

Significance

When complaints are substantiated, the LEA is not meeting student needs, increasing likelihood of risk in other programmatic areas.



4

Mitigation Strategy

Review IEPs and companion documentation regularly, ensure program decisions are based on student needs rather than current offerings, document program implementation decisions and supports.

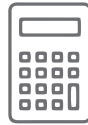
Significant Disproportionality



1

Definition

collect and examine data to determine if sig. dis. based on race and ethnicity is occurring in the state and LEAs (identification, placement, incidences).



2

Risk Points

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



3

Significance

If over/under identification occurs, there is risk of additional non-compliance within the program.



4

Mitigation Strategy

Review data elements, continuum of placement options, and conduct trainings to minimize unnecessary disciplinary actions.

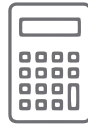
IEP Monitoring Risk



1

Definition

IEP Monitoring Results findings requiring corrective actions and the total number of items reviewed.



2

Risk Points

0-9.99% of non-compliance, 0 points;
10-14.99%, 10 points;
15-19.99%, 20 points;
20-24.99%, 30 points;
25-29.99%, 40 points;
above 30%, 50 points with a maximum of 50 points.



3

Significance

Risk from previous years increases likelihood of risk in subsequent years.



4

Mitigation Strategy

Review previous monitoring results, norm with IEP teams on decision-making and completion of IEPs and companion documents.

Isolation/Restraint Incidents



1

Definition

Duplicate entries
Missing parent notification date/time
Notification date/time before incident date/time
Death reported no death occurred
Missing staff "Not Trained/Total Staff"
Isolation exceeds 60 minutes
Restraint exceeds 5 minutes
Incidents reported during non-school hours



2

Risk Points

0 points if 0% of incidents flagged;

3 points less than 10% flagged;

5 points if more than 10% flagged
(max. 5 points)



3

Significance

Data quality errors and excessive isolation/restraint times indicate additional risk of non-compliance.



4

Mitigation Strategy

Ensure data accuracy in incident reports, review procedures and update, train frequently, de-escalation techniques, seek department support.

Perkins V Sub-Category

Perkins V

- Professional Development (PD) Attendance
- RBM Results
- Years of Experience
- PD Allocation



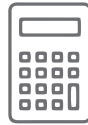
CTE PD Attendance (CTEPDA)



1

Definition

Mandatory attendance at state and regional Career and Technical Education (CTE) director meetings



2

Risk Points

Director who attends

<75% of state meetings: 10 points

<75% of regional meetings: 10 points
Maximum of 20 points.



3

Significance

CTE directors attending monthly regional and quarterly state meetings will receive crucial information for the administration of the Perkins V grant.



4

Mitigation Strategy

CTE directors must make all efforts to attend these meetings or send a designee.

CTE Director Years of Experience (CTExp)



1

Definition

Directors must report years of experience in the role within Tennessee upon submission of the applicable funding application each year.



2

Risk Points

Director who has
3+ years: 0 points

1-3 years: 2 points

>1 year: 5 points



3

Significance

Inheriting work, learning a new role, and managing many requirements creates risk of non-compliance.



4

Mitigation Strategy

Don't assume inherited work was correct; keep documentation; reach out for support from CTE CORE consultants.

CTE PD Allocation (CTE PDH)



1

Definition

LEAs must allocate at least five percent of the Perkins Basic allocation to PD.



2

Risk Points

<5% of the total allocation used for PD= **5 points**



3

Significance

Funds used to provide PD opportunities will increase the skillsets and tools for CTE educators.



4

Mitigation Strategy

Use PD allocation data to compare years where PD allocations were lower/higher to the core indicator of performance data.

Fiscal Sub-Category

Fiscal

- Single Audit Findings
- RBM Results
- Central Finance Office
- Consolidated Funding Application (CFA) Preliminary Award
- Years of Experience
- Comptroller Findings
- Fiscal Representative and Fiscal Update the same
- Awards/Allocations
- Reimbursement Requests
- Drop Dead/Release/Unexpended
- Deadlines
- Excess Carryover



A vertical photograph on the left side of the slide shows the back of a person's head and shoulders. They are looking at a tablet device which is resting on a surface. The person has short brown hair and is wearing a grey sweater over a blue collared shirt.

Changes/Improvements in FY24

- Updated maximum points for Annual Financial Report Findings
- Added Drop Dead/Release of Funds for all federal grants
- Added Reimbursement Request benchmarks



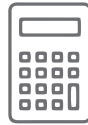
Single Audit Findings or Single Audit Not Required (>\$750k)



1

Definition

Single audits provide assurance to the U.S. government as to the management and use of funds by recipients. This category captures LEAs receiving less than \$750K in federal funds.



2

Risk Points

>1 SA finding= **15 points**



3

Significance

Audit results are directly connected to allowable expenditures.



4

Mitigation Strategy

Ensure necessary, reasonable, allowable expenditures, and document, document, document.

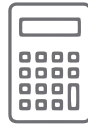
Annual Financial Report Findings



1

Definition

LEAs that are identified during the Annual Financial Report as exhibiting financial risk. For 81 Act counties, all school fund findings will be applied to the applicable LEA.



2

Risk Points

10 points per finding

50 points max



3

Significance

Comptroller reports include 81 Act counties and LEAs financial reports reflect non-compliance with federal, state, and local funds.



4

Mitigation Strategy

Coordinate with central finance office and ensure collaborative opportunities with finance offices.

Central Finance Office



1

Definition

LEAs that use a Central Finance office are at additional risk. Reduced 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.



2

Risk Points

Central Finance Office= **10 points**



3

Significance

Disconnects between local needs/priorities and LEA allowable use of funds can increase risk.



4

Mitigation Strategy

None

All Awards



1

Definition

Total CFA, Perkins (CTE), Elementary and Secondary School Emergency Relief (ESSER) 1.0, ESSER 2.0, and ESSER 3.0 allocations



2

Risk Points

CFA

1 point per million

Perkins

1 point = <\$30,000;

2 points = \$30,001-\$60,000;

3 points = \$60,001-\$100,000;

4 points = \$100,001-\$150,000;

5 points = >\$150,000

ESSER 1.0, 2.0, & 3.0

1 point per million, **max 10**



3

Significance

The greater the award, the higher the propensity for misspending funds.



4

Mitigation Strategy

None

All Drop Dead/Release of/Unexpended Funds



1

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 (ESSA, Perkins, IDEA, & ESSER 1.0-3.0).



2

Risk Points

5 points= Drop or release of >\$100 per federal program area



3

Significance

The release of funds may be an indication that the grant application/plan was not able to be implemented as designed leading to increased risk of non-compliance with required activities and processes.



4

Mitigation Strategy

Review needs assessments, adjust applications, and make plans to spend down funds.

IDEA Excess Carryover



1

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.



2

Risk Points

50% or greater carryover= **10 points**



3

Significance

Not spending on fund generators increases risk of program non-compliance.



4

Mitigation Strategy

Spend funds on fund generators to positively impact students who earned the funds.

Perkins V Drawdown



1

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).



2

Risk Points

< An average of 20% drawdown per quarter= **15 points**



3

Significance

Drawdowns not taking place at least quarterly may be an indication the application/plan was not implemented as designed leading to increased risk of non-compliance with required activities and processes and carrying out the local application.



4

Mitigation Strategy

Communicate with the bookkeeper and/or CFO, ensure obligations and drawdowns are occurring as required per quarter (recommend monthly).

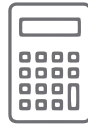
ESSER 2.0 Reimbursement Requests (RR) – 80% Expended



1

Definition

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



2

Risk Points

Maximum of 10 points if at least 80% of the allocation has not been expended as of June 30, 2023.



3

Significance

LEAs must expend funds prior to the end of the period of performance.



4

Mitigation Strategy

Review needs assessments, adjust applications, and make plans to spend down funds.

ESSER 2.0 Monthly Reimbursement Requests



1

Definition

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



2

Risk Points

5 points per month without RR through June 30

10 points max



3

Significance

RR not taking place at least monthly may be an indication the grant application/plan was not implemented as designed leading to increased risk of non-compliance.



4

Mitigation Strategy

Communicate with the bookkeeper and/or CFO, ensure obligations and RR are occurring monthly.

ESSER 3.0 Reimbursement Requests – 50% Expended



1

Definition

The total amount of reimbursement requests compared to 50% of the allocation.



2

Risk Points

Maximum of 10 points if at least 50% of the allocation was not expended as of June 30, 2023.



3

Significance

LEAs must expend funds prior to the end of the period of performance.



4

Mitigation Strategy

Review needs assessments, adjust applications, and make plans to spend down funds.

All Deadlines



1

Definition

LEAs that do not complete the CFA and state funds FER by Oct. 1 and/or miss the original budget deadline for the CFA (May 16) or state budget deadline (Oct. 1) are at risk of not spending allocations on fund generators or reverting funds.



2

Risk Points

Miss final budget or CFA deadline=
10 points; Max 20

Miss CFA or state funds FER= **10 points; Max 20**



3

Significance

Not meeting deadlines exhibits a breakdown in process at the LEA level, commonly contributing to non-compliance.



4

Mitigation Strategy

Calendar deadlines, make plans to check-in with fiscal consultants prior to deadlines, attend relevant PD and office hours. Request extensions in advance for extreme circumstances.

Cross-Cutting Sub-Category

Cross-Cutting

- Designations
- ESSA/IDEA Same Person
- Office of Civil Rights (OCR) Findings
- Director of Schools (DOS) Years of Experience



Priority and Comprehensive Support and Improvement (CSI) Schools



1

Definition

Priority schools, federally known as Comprehensive Support and Improvement (CSI) schools, were the bottom five percent of the schools across the state due to multiple years of low academic performance.



2

Risk Points

15 points=
Priority or CSI school identified



3

Significance

Federal laws, including ESSA and IDEA, require positive trends in program outcomes as a goal with related strategies and action steps.



4

Mitigation Strategy

Connect with stakeholders to create buy-in, adjust strategies that are not providing a return on investment, connect with School Improvement team for support.

In Need of Improvement Schools



1

Definition

Improvement (TSI) or Additional Targeted Support and Improvement (ATSI), are identified based on school performance among student groups.



2

Risk Points

15 points= TSI or ATSI school identified



3

Significance

Federal laws, including ESSA and IDEA, require positive trends in program outcomes as a goal with related strategies and action steps.



4

Mitigation Strategy

Connect with stakeholders to create buy-in, adjust strategies that are not providing a return on investment, connect with School Improvement team for support.

ESSA/IDEA/CTE Director Same Person



1

Definition

The same person with the responsibilities of two or more programs (ESSA, IDEA, and/or CTE).



2

Risk Points

10 points= ESSA, IDEA, and/or CTE director are the same.



3

Significance

Increased workloads and information in multiple program areas, learning a new role, and managing many requirements create risk of non-compliance.



4

Mitigation Strategy

Attend department PD, seek additional PD opportunities, keep documentation; reach out for support from the department area experts; consider reviewing full-time equivalents (FTEs) for adjustment discussions regularly.

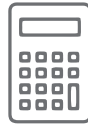
TN OCR Findings



1

Definition

Determination that an LEA lacked documentation and proof to comply with applicable regulations. The LEA is required to take action to resolve the non-compliance.



2

Risk Points

10 points= LEA received an OCR complaint resulting in a finding of non-compliance.



3

Significance

OCR violations affect many subgroups identified in ESSA and other federal laws. OCR findings exhibit risk for other related programs.



4

Mitigation Strategy

Review policies and procedures to ensure practices are inclusive, consider parent and student rights, and involve colleagues to ensure all services are delivered with fidelity.

Years Since Last Monitored Sub-Category

Years Since Last Monitored

- Years Since Last Monitored
 - ESSA/IDEA/ESSER
 - Perkins V
 - Fiscal



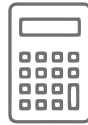
ESSA/IDEA/ESSER/Perkins/Fiscal Program Monitoring Years



1

Definition

LEAs are monitored via one of three results-based monitoring levels. LEAs receive risk points for each year since the last Level 3 (or virtual Level 3) monitoring (formerly on-site).



2

Risk Points

5 points for each year since last Level 3 monitored for each federal program .

Max points= No limit



3

Significance

With each year since being monitored, risk increases. New staff may be in place, procedures have been misplaced, etc.



4

Mitigation Strategy

Stay informed of all current requirements and updates to federal and state laws and ensure these changes are implemented in the LEA where applicable.

Common Questions

Common Questions

- I removed X's role after you ran this report. Can you reduce my score?
- I didn't mean to have ESSA and IDEA directors listed. Can I take one off and you remove my points?
- Am I in trouble?
- Is this bad?
- I'm new in this role. Why me? Can we wait a few years?
- Where does this put me on the list?
- Something's wrong with my score. What do I do?
- I have evidence to show I attended at least 75% of the required meetings. Can you remove my points?

A small icon in the bottom left corner shows a stylized person with a lightbulb above their head and a clock face to their right, all within a dark green triangular background.

SUPPORTING WORK

Business Rules

Business Rules



1. At the department's discretion, LEAs focus monitored in the most recent fiscal year complete Level 3 for the impacted grant(s) regardless of score.
 - No LEAs in FY24.
2. The four most populous LEAs participate in rotation between Levels 2 and 3.
 - 2 LEAs at Level 3
 - 2 LEAs at Level 2



SUPPORTING WORK

Business Rules



3. LEAs that completed Level 3 in the previous fiscal year are excluded and assigned Level 1.
 - 20 LEAs in FY24
4. As other state agencies are not subject to the same reporting and data collection, the Tennessee Department of Children's Services (DCS), Tennessee Public Charter School Commission (TNPCSC), and Tennessee Department of Correction (DOC) participate in Level 3 at least every three years.
 - One LEA in FY24



SUPPORTING WORK

Business Rules



5. State-run 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.
 - One LEA in FY24
6. The LEA with the highest score in the ESSA subcategory eligible for monitoring is identified for Level 3.
 - One LEA in FY24



SUPPORTING WORK

Business Rules



7. The LEA with the highest score in the IDEA subcategory eligible for monitoring is identified for Level 3.
 - One LEA in FY24

8. The LEA with the highest score in the Perkins subcategory eligible for monitoring is identified for Level 3.
 - Two LEAs in FY24 (tied score)



SUPPORTING WORK

Business Rules



9. The LEA with the highest score in the Fiscal subcategory eligible for monitoring is identified for Level 3.
 - One LEA in FY24
10. LEAs not on a rotation that rise to an elevated level for a third year in a row are promoted to Level 3;
 - a) To allow for capacity if this occurs, the LEA with the lowest significant risk is reassigned to Level 2.
 - One LEA in FY24



SUPPORTING WORK

Business Rules



11. At least 10% of LEAs receiving funds via the CFA are identified for (virtual) Level 3.
 - 7 LEAs impacted
12. Between Level 3 and Level 2, at least 20% of LEAs are identified.
 - 12 LEAs impacted



SUPPORTING WORK

Business Rules



13. A random selection of one or more LEAs to participate in Level 3 may occur prior to determining Levels 2 and 1. LEAs not been monitored in person in the past three years are eligible to be randomly selected using a random number generator.
 - One LEA impacted
14. All remaining LEAs are identified for Level 1.
 - 98 remaining LEAs impacted

SUPPORTING WORK





Thank You!

Questions?

Permission is granted to use and copy these materials for non-commercial educational purposes with attribution credit to the "Tennessee Department of Education". If you wish to use these materials for reasons other than non-commercial educational purposes, please contact Joanna Collins (Joanna.Collins@tn.gov).

Fraud, Waste or Abuse

Citizens and agencies are encouraged to report fraud, waste, or abuse in State and Local government.

NOTICE: This agency is a recipient of taxpayer funding. If you observe an agency director or employee engaging in any activity which you consider to be illegal, improper or wasteful, please call the state Comptroller's toll-free Hotline:

1-800-232-5454

Notifications can also be submitted electronically at:

<http://www.comptroller.tn.gov/hotline>

Tuesday-Thursday

Please Share Your Feedback:

You may access the PD by navigating here:

https://stateoftennessee.formstack.com/forms/2023fpi_pd_survey

