

2025

**FEDERAL
PROGRAMS
INSTITUTE**

**MEMPHIS
TO
BRISTOL**

Federal Programs
Driving Local Change

Roadside Wisdom: A Fireside Chat on Avoiding FY25 Compliance Pitfalls

FPO Compliance Team

Division of Federal Programs and Oversight



Co-Presenters

- **Geneva Taylor** | *Senior Director of Compliance*
- **Michael Gateley** | *Perkins V Compliance Manager*
- **Teri Manning** | *Data Governance Manager*





Agenda

- Overview
- Common Trends
 - Every Student Succeeds Act (ESSA)
 - Individuals with Disabilities Education Act (IDEA)
 - Strengthening Career and Technical Education for the 21st Century Act (Perkins V)
 - Fiscal
 - Other
- Activities
- Resources
- Updates
- Conclusion



Overview

Meeting Preface

- These results are based on trends from FY25 Results-Based Monitoring.
 - Laws, rules, and guidance are living documents that commonly updated.
- Review written policies and procedures.
- Plan to review with applicable team members on a regular (at least annual) basis.
- Swap reviewing a colleague's procedures to gain a fresh perspective.
- Review the Documentation list for a detailed list of policies, procedures, and processes required for review.

FY26 Monitoring Processes

- Results-Based Monitoring (RBM)
 - Level 3 (*In-Person*)
 - Level 2 (*Virtual with Interview Component*)
 - Level 1 (*Virtual; no interview component*)
- Individualized Educational Program (IEP) Monitoring
- Coordinated Early Intervening Services (CEIS) Monitoring
- Comprehensive Coordinated Early Intervening Services (CCEIS) Monitoring
- Focus Monitoring
- ***New:*** Formal Technical Assistance Logs



ESSA Trends

ESSA Monitoring Components

- Title I, Part A – Improving Basic Programs
- Title I, Part A – Students in Foster Care
- Title I, Part C – Education of Migratory Children
- Title II, Part A – Supporting Effective Instruction
- Title III, Part A – English Language Acquisition
- Title III – Immigrant Students
- Title IV, Part A – Student Support and Academic Enrichments
- Title IX, Part A – Education for Homeless Children and Youth
- *Title I, Part A – Targeted Assistance*
- *Title V, Part B – Rural Education Initiative*
- *ESSA Equitable Services to Non-Public Schools*
- *ESSA Charter School Oversight*
- *ESSA Virtual School Oversight*

Title I, Part A – Improving Basic Programs

- Missing or inadequate documentation for **annual Title I meeting** (invitation, agenda, sign-in sheets, and components).
- Lack of evidence that the parent compact and family engagement policy was **jointly developed**.
- Not including the **roles of participants** on the sign-in sheets.

Action Steps to Mitigate Risk

- **Create Standard Templates** for:
 - Meeting invitations
 - Agendas (including topic, date, time, location)
 - Sign-in sheets with a column for participant roles (e.g., parent, teacher, community member)

- **Document Joint Development**
 - Meeting notes or minutes summarizing decisions made collaboratively
 - Collect signatures from participants affirming the compact/policy was jointly developed

Title I, Part A – Students in Foster Care

- Lack of **policies and procedures** for enrolling and serving students in foster care
- Lack of **training** to all appropriate school-level enrollment personnel and administrators on the **requirements of educational stability for students in foster care**

Action Steps to Mitigate Risk

1. Develop or Revise Written Policies and Procedures for:

- Immediate enrollment of students in foster care
- Transportation coordination between child welfare agencies and schools
- Ensuring school stability
- Align all procedures with **ESEA §1111(g)(1)(E)**

2. Provide Annual Training to School-Level Staff

- Identify key staff (e.g., front office, enrollment staff, school counselors, admin)
- Deliver annual training on:
 - The definition of foster care and McKinney-Vento overlap
 - Requirements for educational stability
 - How to identify and support students in foster care
- Include guidance from TDOE's Foster Care Toolkit or federal guidance
- Retain the following documentation:
 - Agenda
 - PowerPoint or training materials
 - Sign-in sheet (with staff roles)

Title I, Part C – Education of Migratory Children

- Lack of a **written process to identify, code, and serve students** who are Migrant students according to the federal definition
- Lack of a **written procedures** to distribute, collect, and submit **Occupational Surveys**.
- Lack of **written procedures** for completing the **Individual Needs Assessment (INA)**.

Action Steps to Mitigate Risk

- **Align procedures with the federal definition of migratory child under Title I, Part C, and the current TN MEP.**
- **Develop Clear Written Procedures for:**
 - Distributing and reviewing Occupational Surveys (OS)
 - Ensuring proper identification through COE
 - Ensuring proper coding of eligible students in SIS
 - Providing support services
- **Distribute and Document Occupational Surveys**
 - Use the most current TDOE-approved Occupational Survey form/questions
 - Translate the survey into languages commonly spoken in the LEA
 - Include instructions for school staff on how and when to distribute and collect the forms
 - Set a timeline and tracking system to ensure all students receive and complete the OS each year.
 - Keep signed and completed surveys on file for monitoring

Action Steps to Mitigate Risk Cont'd

- **Establish Procedures for Completing the Individual Needs Assessment (INA)**
- Create written guidance for staff on how to:
 - Complete the INA for eligible students
 - Document and update INA information as needs change
 - Align procedures with TDOE INA Guidance (found in TDOE resources)
- **Provide Staff Training**
- Train front office, registrars, and Migrant liaisons on:
 - Administering and handling the OS
 - Identifying red flags for eligibility
 - Completing INA and referring students for services
- Retain agendas, sign-ins, and presentation materials for monitoring documentation

Title III, Part A – English Language Acquisition

- **No written procedure** for how the LEA provides translation and/or interpretation to family members
- Not ensuring students have **English as a Second Language (ESL) service times** in alignment with EL Proficiency levels *and* not including transition times between EL classes
- **Individual Learning Plan (ILP) templates** not including all requirements
- **Parent Notification templates** not including all requirements
- **EL Reclassification procedure** not including all requirements
- **ESL training** not including all required components

Action Steps to Mitigate Risk- EL cont.

- **Develop a Written Procedure for Translation and/or Interpretation**
 - Develop and distribute a **written procedure** outlining how families request and receive language services.
 - Include guidance on using **qualified interpreters and translators**, not students or untrained staff.
 - Translate critical documents (e.g., report cards, EL notifications, discipline letters)
 - Train school staff annually on language access requirements.
- **Ensure ESL Service Times are Aligned to EL Proficiency Levels and Schedules Include Time**
 - Review each EL student's **ELPA21 score** to determine appropriate daily/weekly ESL service time.
 - Include **transition time** when scheduling ESL instruction (TDOE-approved models).
 - Create a tracking document to compare EL Proficiency levels to actual services received.
 - Update school master schedules and ensure alignment with EL needs.

Action Steps to Mitigate Risk- EL cont.

- **Ensure ILP Templates Include Required Components**
- Update ILP templates to include:
 - Language proficiency goals
 - Instructional supports
 - Assessment accommodations
 - Input from parents and teachers
- Provide staff training on completing and maintaining ILPs
- Designate a lead for **ILP oversight and quality checks**

- **Ensure Parent Notification Templates Include Required Components**
- Review and revise EL parent notification letters to include:
 - EL identification and ELPA21 score summary
 - Language instruction model
 - Exit criteria
 - Parent rights, including the right to opt out

Action Steps to Mitigate Risk- EL cont.

- **Ensure EL Reclassification Procedure Includes Required Elements**
- Create or revise a **written reclassification process** that includes:
 - TDOE Reclassification Procedure for ELs (found in TDOE resources)
 - Multiple sources of data (e.g., grades, classroom performance)
 - Documentation and timeline for making decisions
- Train staff annually on the procedure

- **Ensure Staff Training Includes All Required Components**
- Provide annual ESL training to all relevant staff that covers:
 - The Tennessee English language development (ELD) standards;
 - Appropriate ESL instructional methods to use with grade-level academic content standards;
 - English language acquisition training for general education teachers to understand the process of acquiring a second or subsequent language;
 - Strategies for collaboration between teachers serving EL students so that ILPs are developed and implemented by all educators; and
 - The requirements regarding ILP development and implementation.

Title III – Immigrant Students

- **Lack of procedure** outlining the process to **identify, code, and serve** immigrant students

Action Steps to Mitigate Risk

- **Develop a Written Procedure**
 - Create a documented process that outlines how immigrant students are identified, coded in the student information system (e.g., EIS/SIS), and served according to federal guidance.
- **Define Eligibility Criteria**
 - Clearly state the federal definition of immigrant children/youth (e.g., age 3–21, not born in any U.S. state, and enrolled in U.S. schools for less than 3 full academic years).
- **Train Enrollment and Data Entry Staff**
 - Provide annual training to enrollment staff and data specialists on immigrant coding procedures and eligibility criteria to ensure consistent and accurate identification.
- **Establish a Referral and Support Process**
 - Outline how immigrant students are referred to academic, language, and wraparound support services (e.g., tutoring, counseling, translation).
- **Monitor and Review Data Regularly**
 - Set up regular data checks to ensure immigrant coding in EIS/SIS is accurate and aligned with documentation on file.

Title IX, Part A – Education for Homeless Children and Youth

- Missing or Insufficient Homeless Program **Policies** and **Procedures**
- **Incomplete LEA-level dispute resolution process**
- Lack of **training** to all appropriate school-level enrollment personnel and administrators on the **requirements of identifying and enrolling students experiencing homelessness.**

Action Steps to Mitigate Risk

- **Develop or Strengthen Homeless Policies & Procedures**

- Develop and maintain board-approved policies outlining identification, enrollment, and support for homeless students.
- Align policies with McKinney-Vento requirements (e.g., immediate enrollment, dispute resolution).
- Identify the LEA homeless liaison and clearly define their role and responsibilities.
- Define roles of other key school staff (e.g., front office, counselors).
- Review and update policies annually.
- Post policies on the website and offer translated versions.

- **Develop or Revise LEA-Level Dispute Resolution Process**

- Review the LEA's dispute resolution procedure to ensure all steps required by **McKinney-Vento** and **state guidance** are included (e.g., timelines, written explanations, right to appeal).
- Update the policy to align with the **TDOE Homeless Education Dispute Resolution Guidance**.

Action Steps to Mitigate Risk Cont'd

- **Train Enrollment and School-Level Staff on McKinney-Vento Requirements**
 - Develop and implement an annual McKinney-Vento training for all frontline staff (e.g., registrars, counselors, school administrators).
 - Ensure training covers key topics: definition of homelessness, immediate enrollment, school of origin, transportation rights, and identifying warning signs.
 - Maintain training attendance logs, agendas, and materials for documentation.
 - Provide refresher sessions during the school year and include McKinney-Vento in new staff onboarding.



IDEA Trends from Results-Based Monitoring

IDEA Monitoring Components

- IDEA, Part B—General, State Eligibility, & LEA Eligibility
- IDEA, Part B—Evaluations, Eligibility Determinations, IEPs, and Educational Placements
- IDEA, Part B—Procedural Safeguards & Monitoring, Enforcement, Confidentiality, & Program Info
- IDEA, Part B—State Level Requirements
- IDEA, Part B, Preschool
- Adult Students Ages 18-21 Detained in Jails
- IDEA Equitable Services to Non-Public Schools
- IDEA Charter School Oversight
- IDEA Alternative Education Oversight
- IDEA Virtual School Oversight

IDEA, Part B—General, State Eligibility, & LEA Eligibility

- Most Common: Inadequate evidence that the LEA has written procedures for all components of TN SBE Rule 0520-01-09-.09(1)(g).

What is TN SBE Rule 0520-01-09-.09(1)(g)?

(g) Establishes and has in effect policies, procedures, and programs that are consistent with this chapter for implementing the provision of special education and related services in order to ensure compliance with applicable state and federal regulations including, but not limited to:

What is TN SBE Rule 0520-01-09-.09(1)(g)?

1. Free appropriate public education, including interagency agreements to ensure FAPE for all children;
2. Child find procedures;
3. Evaluation, reevaluation and determination of eligibility procedures;
4. IEP/Individual Family Service Plan (IFSP) procedures;
5. Confidentiality procedures;
6. Private school services procedures;
7. Goals for performance of children with disabilities through school improvement planning;
8. Inclusion of children with disabilities in state and district-wide assessment programs with appropriate accommodations and modifications and the reporting of assessment data; and
9. Maintenance of effort.

What is TN SBE Rule 0520-01-09-.09(1)(g)?

Most commonly, LEAs miss one or more of these written procedures.

- IEP Procedures (13)
- Goals for Performance (10)
- MOE (8)
- Confidentiality (7)
- Child Find (7)

Action Steps to Mitigate Risk

- **Develop or update written procedures** for all required components under TN SBE Rule 0520-01-09-.09(1)(g)
- **Prioritize commonly missed areas:** IEPs, Child Find, Confidentiality, MOE, and Student Performance Goals
- **Ensure procedures align** with current federal and state special education regulations
- **Review and approve procedures annually**, and share with all relevant staff
- **Maintain documentation** of implementation and training for monitoring and compliance

IDEA, Part B—Evaluations, Eligibility Determinations, IEPs, and Educational Placements

Most Common: Inadequate evidence of clearly written procedures to ensure that mandated timelines and required procedures are being adhered to for initial evaluations according to 34 CFR § 300.301.

What does 34 CFR § 300.301 require?

- Must conduct a full and individual initial evaluation before the initial provision of special education and related services.
- (b) ***Request for initial evaluation.*** Parent or a public agency may initiate a request an initial evaluation
- (c) ***Procedures for initial evaluation.*** The initial evaluation—(1)
 - (i) Must be conducted within **60 days** of receiving parental consent for the evaluation; or
- (2) Must consist of procedures—
 - (i) To determine if the child is a child with a disability under [§ 300.8](#); and
 - (ii) To determine the educational needs of the child.

Action Steps to Mitigate Risk

- Develop written procedures for LEA-level oversight of school procedures.
- Develop written procedures for school level.
 - Referral processes outline
 - Requests for evaluation and points of contact
 - Timelines and tracking processes
 - Communication protocols and documentation of communications
 - Purpose(s) and responsibilities for evaluation
 - Exceptions to the timeline/procedure

IDEA, Part B—Procedural Safeguards & Monitoring, Enforcement, Confidentiality, & Program Info

- Most Common: Inadequate evidence that the LEA is following the process to ensure the protections that must be afforded to all students with disabilities ages 3-21, **related to discipline**, including those related to in-school suspension, a change of placement, manifestation determination review (MDR), and provision of services beginning with the 11th cumulative day of removal in a school year (34 CFR §§ 300.530-536 and TN SBE Rule 0520-01-09-.24)

What is required under 34 CFR §§ 300.530-536 and TN SBE Rule 0520-01-09-.2?

- Outlines short-term and long-term removals
- Requires Manifestation Determination within 10 school days
 - Decisions to change placements
 - Determines whether behavior was caused by or directly related to disability
- Projects Due Process
- TN SBE Rule 0520-01-09-.24 outlines FBA and BIP requirements
 - Requires an FBA after Manifestation Determination confirms relation to disability and change in placement.

Action Steps to Mitigate Risk

- **Develop or update written procedures** for all required components.
- **Include requirements for FBA and BIPs** related to TN SBE Rule.
- Include clear expectations that **MDR** decisions are made by the MDR team determined by the parent and the LEA.

IDEA, Part B—State Level Requirements

Most Common: Inadequate isolation rooms and/or inadequate training to meet the required rules and regulations set forth in T.C.A. § 49-10-1304 and TN SBE Rule 0520-01-09.-23.

What do T.C.A. § 49-10-1304 and TN SBE Rule 0520-01-09.-23 require?

- T.C.A. § 49-10-1304, the Special Education Behavioral Supports Act (SEBSA), sets restrictions on isolation and physical restraint.
- Some processes/procedures were missing:
 - **IEP Team Review:** ensure an IEP team meeting convened within 10 days*
 - **FBA/BIP Requirements:** IEP team review of the existing FBA/BIP, or the need for an FBA/BIP if it did not already exist.*
 - **Parent Notification:** notify parents on the same day the isolation/restraint occurs.
 - **Incident Documentation:** complete immediate documentation of the incident.
 - The report must be submitted to the state within 5 days.
 - Rule further outlines required IEP team members and components of the IEP.

**if the IEP didn't already authorize the use of isolation/restraint or isolation/restraint was used for an extended period (as defined by the State Board). (T.C.A)*

Action Steps to Mitigate Risk

- Develop written procedures for LEA-level oversight.
- Develop written procedures for school-level operations.
Consider including or referring to separate processes on:
 - Isolation/Restraint Training Information
 - Trained Personnel Points of Contact/Communication Process
 - Parent Notification Procedures
 - Incident Documentation Process
 - IEP Team Meeting Convening
 - FBA/BIP Development/Updates

IDEA, Preschool

- Most common: Inadequate evidence of providing Free Appropriate Public Education (FAPE) to students with disabilities ages 3-5 as outlined in 34 CFR §300.101.

What is 34 CFR §300.101?

- FAPE begins no later than the child's 3rd birthday.
- An IEP team must meet to develop an IEP by that date (if in summer, IEP team determines when services begin.)
- FAPE is required regardless of academic performance or disciplinary status.
- Once an IEP is developed, it must be implemented within 14 days via TN SBE Rule 0520-01-09-.12 (3)
 - No exceptions for staffing or capacity.

Action Steps to Mitigate Risk

- Identify and evaluate students.
- Develop a tracker to follow timelines.
- Develop the IEP with the IEP team.
- Determine Least Restrictive Environment.
- Place students and implement the IEP immediately.
- Find alternative placements or service providers.
- Document efforts to provide services.

Adult Students with Disabilities Detained in Jails

- An LEA with a jail within its geographic boundaries must work in coordination with the county-operated detention center to provide special education and related services to adult detainees (*or students being held as adult*) with disabilities who are legally mandated to receive an education (TN SBE 0520-01-09).

Action Steps to Mitigate Risk

- Document collaboration, such as a Memorandum of Understanding (MOU), with a jail or detention center within LEA geographic boundaries.
 - Written process to serve students
 - Documentation that students receive services (TN SBE Rule 0520-01-09)



Perkins V Trends

Perkins V Monitoring Components

- Perkins V Cross-Cutting
- Effective Educators
- Students with Disabilities (SWD)
- Students in Special Populations (Non-SWD Groups)
- Equitable Services to Non-Public Schools
- Charter Schools
- SSQI

Perkins V Cross-Cutting

- Lack of documentation showing an attempt to consult representatives from all required stakeholder groups to inform the comprehensive local needs assessment (CLNA)
- Lack of documentation showing evidence gained by consulting CLNA stakeholders
 - According to Perkins V § 134(c)(2)(D)&(E), LEAs are required to consult a diverse group of stakeholders, as defined in Perkins V, on specific topics/content for the creation and revision of the CLNA and the local application on an ongoing basis.

Action Steps to Mitigate Risk

- **Engage Required Stakeholders for CLNA**
 - Identify and invite all required groups listed in Perkins V §134(c)(2)(D)&(E) (e.g., educators, industry, parents, students) to give input on the CLNA.
- **Document the Process**
 - Keep sign-in sheets, agendas, and notes to show how input was gathered and used.
- **Establish Ongoing Consultation**
 - Create a schedule to consult with stakeholders regularly throughout the CLNA cycle.

Effective Educators

- Lacking documentation showing the LEA provided sufficient evidence for Career and Technical Education (CTE) educator trainings that meet the requirements of professional development (PD) as outlined in Perkins V § 3(40)
 - PD is defined as activities providing the skills to ensure student success in CTE, and that are sustained (not stand-alone, one-day, or short-term workshops), intensive, collaborative, job-embedded, data-driven, and classroom-focused, and to the extent practicable evidence-based.

Action Steps to Mitigate Risk

- **Offer Quality CTE PD**

- Provide training that is sustained, collaborative, and job-embedded, not just a one-day session.

- **Align PD to Perkins V Requirements**

- Make sure trainings help educators build skills that support CTE student success and are data-driven and classroom-focused.

- **Keep Documentation**

- Save agendas, sign-ins, and training materials to show that PD meets the definition under Perkins V §3(40).

Students with Disabilities

- Lacking evidence that specific career guidance and academic counseling for students with disabilities throughout their secondary career is occurring consistently at all schools
 - According to Perkins V § 134(b)(3)(C), the LEA must provide a description of an organized system of career guidance and academic counseling prior to enrollment in CTE courses and throughout their CTE careers for all students, especially students with disabilities.

Action Steps to Mitigate Risk

- **Develop a Counseling System**

- Create a clear, organized plan for providing career guidance and academic counseling for all students, especially those with disabilities.

- **Ensure Consistent Support**

- Make sure every school offers ongoing career and academic counseling before and during CTE course participation.

- **Document Counseling Services**

- Keep records of counseling schedules, student meetings, and materials used to show that consistent support is being provided.

Students in Special Populations (Non-SWD Groups)

- Lacking evidence showing how special populations are identified, what data is collected, and how data is analyzed for gaps and barriers
- According to Perkins V § 113(b)(4)(B)(ii), LEAs must identify students in special populations and disaggregate data for the subgroups of students described in ESSA § 1111(h)(1)(C)(ii) and Perkins V § 3(48). LEAs must also identify and quantify any disparities or gaps in performance as described in Perkins V § 113(3)(C)(ii)(II), including special populations as defined by Perkins V, and the performance of all CTE concentrators served by the LEA.

Action Steps to Mitigate Risk

- **Identify Special Populations**

- Create a process to identify students in special populations using ESSA and Perkins definitions.

- **Collect and Disaggregate Data**

- Gather data on student performance and disaggregate by subgroup to flag trends and disparities.

- **Analyze for Gaps**

- Review the data regularly to identify barriers or performance gaps and use findings to guide support.

Perkins V Action Steps to Correct Trending Non-Compliance

- Ensure the following items are well documented:
 - Training (include proof of attendance, agenda, and training materials),
 - data collection (methods, discussions, related meetings and decision-making business rules), and
 - proof of supporting vulnerable subgroups in CTE.

Action Steps to Mitigate Risk

- **Document Training Activities**

- Keep records of CTE-related training, including sign-in sheets, agendas, and materials used.

- **Track Data Collection Processes**

- Record how data is collected and discussed, including meeting notes and decision-making business rules.

- **Evidence of Targeted Support**

- Maintain evidence of how the LEA supports special populations in CTE, such as accommodations, services, or targeted programs.

Size, Scope, and Quality Indicators (SSQIs)

- SSQI portfolios not meeting compliance as set out in the Tennessee State Perkins V plan
 - Level 3= Portfolios for 25% of the programs at each participating school are reviewed
 - Level 2= Only the two POS identified in the CTE local application as the high-quality POS are reviewed
 - greater than 75% of portfolios reviewed must meet compliance
 - Finding of non-compliance written for LEA's not meeting the 75%
 - Perkins V § 135(b) outlines the requirements for use of funds stating they are to be used on CTE programs of sufficient size, scope, and quality.

Action Steps to Mitigate Risk- SSQI

- **Strengthen Portfolio Quality and Review Process**
 - Train CTE staff on SSQI portfolio requirements.
 - Implement internal reviews before submission.
 - Take corrective steps to ensure at least 75% meet compliance.



Fiscal Trends

Fiscal Monitoring Components

- General Fiscal
- Compensation
- Travel
- Equipment
- Procurement and Contracts
- ESSA Use of Funds
- IDEA Use of Funds
- Perkins V Use of Funds
- ESSER 3.0 Use of Funds

General Fiscal Requirements

- Due to the excessive carryover amounts, current-year allocations are not benefiting current-year students (34 C.F.R. §§ 76.707-.710; 2 C.F.R. §§ 200.77, 200.309).
- If excess carryover is determined during monitoring, an LEA must provide a spend-down plan to expend the funds.

General Fiscal

- The LEA must have written procedures regarding time and effort that demonstrate a system of internal control which provides reasonable assurance that personnel charges are accurate, allowable, and properly allocated (2 C.F.R. §§ 200.302-.303).
- LEAs must provide time and effort documentation:
 - Semi-Annual Certification signed and dated by the employee or supervisor for staff that is funded 100% by one grant or activity including stipends
 - Personnel Activity Report (PAR)/Monthly Activity for staff that is funded with more than one funding source

Travel

- Documentation provided during the monitoring process did not clearly outline policies and procedures for travel. Board policy and procedures do not include mileage or expense rates.
- According to 2 C.F.R. § 200.475, policies and procedures for travel must be clearly documented.

Equipment

- Some components required to be collected and documented as part of the equipment management process were missing in the provided inventory.
 - Clear policies and procedures for equipment inventory management must be provided.
 - All information must be provided on the inventory listing as required in 2 C.F.R. § 200.313.
- Not all equipment was located, or equipment was incorrectly tagged.
 - The LEA must review asset reports to ensure all required data is included as outlined in 2 C.F.R. §§ 200.302(b)(4), 200.313(d)(1).

Procurement and Contracts

- The approval from the federal program supervisor was not included on many documents including travel.
 - According to 2 C.F.R. §§ 200.318, 200.208, the LEA must have federal program supervisor approval as evidence that the use of federal funds is necessary, reasonable, and allocable prior to purchase.
 - This language must be included in the LEA's written procurement and contract policy and procedures.
 - Federal program supervisor includes ESSA, IDEA, ESSER, and CTE directors.

ESSA and IDEA Use of Funds

- Monitoring teams were unable to match expenditures in ePlan with submitted reimbursement request documents.
 - According to 2 C.F.R. §§ 200.300-.309, costs must be adequately documented.
 - 2 C.F.R. § 200.403 states costs must meet specific criteria to be allowable under federal awards.
 - Take advantage of templates in the monitoring instrument.

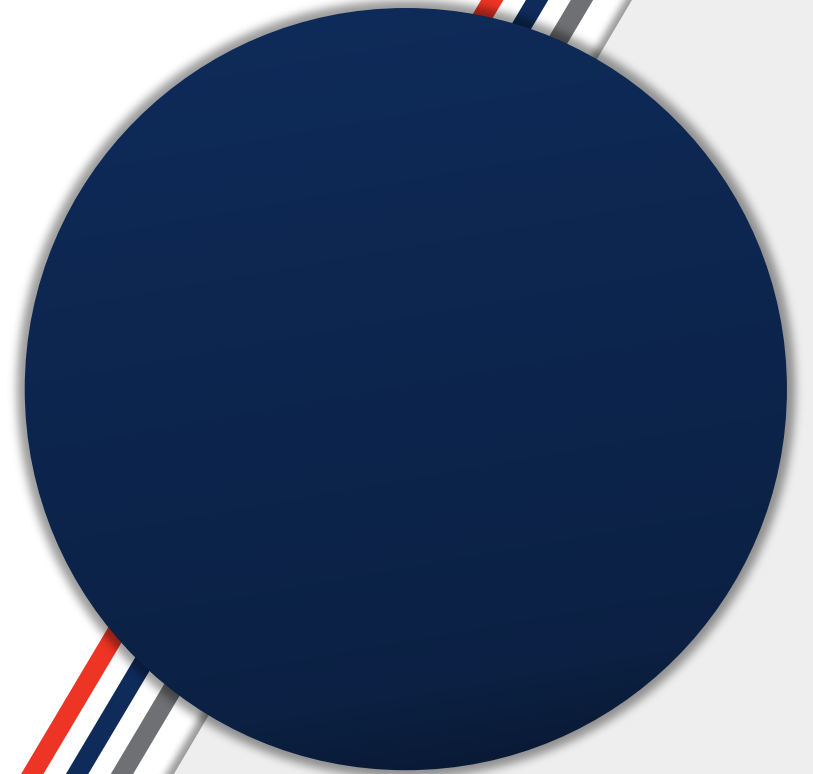
LEA Number _____							
LEA Name _____							
Voucher# _____							
Request Period _____ Same date as "Fiscal Information As Of" date entered in ePlan request.							
Amount _____ If amount requested does not match supporting documentation to the penny, please explain.							
Federal Grant _____							
LEA to Complete This Section (All fields are required except Optional Notes.)						TDOE to Complete This Section	
Account Code(s)	Line Item(s)	\$ Amount	Document Name	Page Number(s)	Optional Notes	Portion of Item(s) Purchased	Does Documentation Support Amount Requested?

Perkins V Use of Funds

- Not all equipment was located.
- Equipment was incorrectly tagged.
 - Clear policies and procedures for equipment inventory management must be provided.
 - All information must be provided on the inventory listing as required in 2 C.F.R. § 200.313.

Summary of Fiscal Monitoring Components

- Sufficient and clearly stated policies and procedures must be present to guide the performance of duties.
 - Policies and procedures must be followed.
 - Update to align with current practices as appropriate.
 - Set time on your calendar to review at least annually.
- Proper approval by program/project director for expenditures
- Cash management policies
- Sufficient documentation for expenditures
- Equipment management





Other Trends

Other Monitoring Components

- Cross-Cutting

Cross-Cutting

- The LEA uploaded an enrollment form that requires a **social security number**.
 - This requirement could potentially create a barrier to enrollment for students in foster care and other subgroups. ESEA § 1111(g)(1)(E) requires “immediate enrollment even if the child is unable to produce records normally required for enrollment.”
- The LEA uploaded an enrollment form where the **birth certificate** was required, and the same requirements were also listed on the website.
 - This requirement could create a potential barrier to enrollment for some students including homeless, EL, immigrant, migrant, and foster care students. McKinney-Vento students must be provided equal access to the same free, appropriate public education, including public preschool education, as is provided to other children and youth [42 U.S.C. § 11431(1)].
 - Schools must enroll children and youth experiencing homelessness immediately, and ensure they receive educational and related services for which they are eligible (42 U.S.C § 11432(g)(6)(A)(iii)), even if they are unable to produce records normally required for enrollment or have missed application or enrollment deadlines during any period of homelessness [42 U.S.C. § 11432(g)(3)(C)(i)].



Action Steps to Mitigate Risk

- Review and Revise Enrollment Materials
 - Clarify that Social Security numbers and birth certificates are **not required** to enroll.
 - If a Social Security number is requested, indicate that it is **optional**.
 - Ensure all forms and websites reflect **immediate enrollment** rights for all students, even without full documentation.

Cross-Cutting

- There is insufficient evidence that the LEA has a current comprehensive **5-year strategic plan**.
 - Per SBE Rule 0520-01-03-03 (14), the LEA must develop a formal five-year strategic plan and submit it to the department for review and approval. The LEA must review and revise the five-year strategic plan every two (2) years.

Action Steps to Mitigate Risk

- Develop and Maintain a Strategic Plan
 - Create a comprehensive 5-year strategic plan aligned to SBE Rule 0520-01-03-.03(14) that outlines the LEA's goals, initiatives, and performance benchmarks.
 - Set a calendar reminder to review and update the strategic plan every two years so it stays current and reflects current data, priorities, and stakeholder input.



Resources and Summary



Resources

- Pull your LEA's most recent *Monitoring Results*.
 - *ePlan > Monitoring Instrument > FY25 > Sections Page > Monitoring Results – LEA Response*
- Review risk analysis data.
 - *ePlan > Data and Information > FY25 > Results-Based Monitoring Risk Analysis*
 - [FY25 Risk Analysis Guide](#)
 - *FY26 Guide coming soon!*
- FPO.Monitoring@tn.gov
 - Email the department with any questions or concerns
- FPO Monitoring Office Hours
 - Announcements and invites coming soon!
 - IEP Monitoring Hours: Mondays 11-12 CT (12-1 ET)
 - RBM Office Hours: Mondays 12-1 CT (1-2 ET)

Summary

- These results are based on trends from FY25 Results-Based Monitoring.
 - Laws, rules, and guidance are living documents that commonly updated.
- Review written policies and procedures.
- Plan to review with applicable team members on a regular (at least annual) basis.
- Swap reviewing a colleague's procedures to gain a fresh perspective.
- Review the Documentation list for a detailed list of policies, procedures, and processes required for review.



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>

Please share your session feedback



You may access the PD Survey by navigating here:

<https://forms.office.com/r/sbRAwQUV0d>



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).