

2025
**FEDERAL
PROGRAMS
INSTITUTE**

**MEMPHIS
TO
BRISTOL**

Federal Programs
Driving Local Change

FY26 Results-Based Monitoring Risk Analysis: Keeping Your Points Between the Lines



DISCLAIMER – Generative AI Tools

The State of Tennessee does not currently permit the use of Generative AI tools, such as Otter, in meetings hosted on state resources. Meetings with contractors, vendors, and subrecipients are not public meetings and may involve discussion of protected state data. Generative AI tools are not adequately regulated and are designed to train on data that is collected and may misrepresent data or release protected data to the general public. While the State supports your desire to maintain documentation of the meeting and what you learn, please respect our decision to safeguard information and do not attempt to use tools such as these. If you choose to use a tool such as this, the State will block that tool from the meeting.





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



2025

**FEDERAL
PROGRAMS
INSTITUTE**

**MEMPHIS
TO
BRISTOL**

Federal Programs
Driving Local Change

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)], 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 12%)
 - **Level 2:** Monitoring tier for LEAs earning **elevated** risk on risk analysis (at least 12%)
 - **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



Please Share your Feedback:

You may access the PD Survey by navigating here:

<https://forms.office.com/r/eVtWEAZ9xZ>





How does the risk analysis work?

- **ESSA**
- **IDEA**
- **Perkins V**
- **Finance**
- **Cross-Cutting/Other**
- **Years Since Last Level 3 (formerly on-site) Monitored**

2025

**FEDERAL
PROGRAMS
INSTITUTE**

**MEMPHIS
TO
BRISTOL**

Federal Programs
Driving Local Change

ESSA Sub-Category

ESSA

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

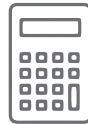
Subgroup Data: English Learners



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 Data Specialist.

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 Data Specialist.

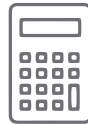
Subgroup Data: Students Experiencing Homelessness



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 Data Specialist.

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 Data Specialist.

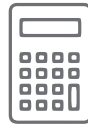
Subgroup Data: Migratory Students



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 Data Specialist.

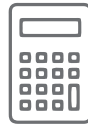
Subgroup Data: Military Dependents



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 Data Specialist.

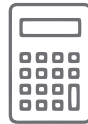
ESSA Complaints with Findings



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.

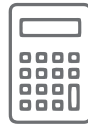
English Learner Graduation Rate



1

Definition

The English Learner graduation rate risk flag = 1 for LEAs in which the graduation rate for English Learner students is less than or equal to 38% AND the English Learner 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 who are long term English Learners and/or not meeting goals are less likely to graduate



4

Mitigation Strategy

Updating ILPs, supporting students with their goals, ensuring teachers are trained in teaching strategies for ESL

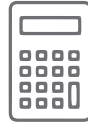
Foster Care Graduation Rate



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.

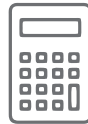
Homeless Graduation Rate



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 FY25 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.

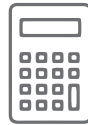
All Experience for Directors, Bookkeepers, etc.



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.

Updates

- In FY27, the definition for ESSA Director Years of Experience will update to years of experience in the role within the LEA upon submission of the CFA each year. LEAs with multiple staff members listed receive risk based on the newest person added.
- In FY27, the definition for ESL Director Years of Experience will update to years of experience in the role within the LEA upon submission of the CFA each year. LEAs with multiple staff members listed receive risk based on the newest person added.

2025

**FEDERAL
PROGRAMS
INSTITUTE**

**MEMPHIS
TO
BRISTOL**

Federal Programs
Driving Local Change

IDEA Sub-Category

IDEA

- **Updated:** LEA-Level Isolation/Restraint Incidents (Isores)
 - incidents in which a parent was not notified on the same day as the incident

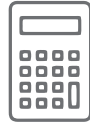
Annual Performance Report (APR): Final Score (%)



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.

Annual Performance Report (APR): 3B (apr3b)



1

Definition

Not meeting the target in:

- 1) English-Language Arts Grades 4 and 8 Assessment Proficiency Change;
- 2) Math Grades 4 and 8 Assessment Proficiency Change;
- 3) End-of-Course for English Language-Arts Assessment Proficiency Change; and
- 4) End-of-Course Math Assessment Proficiency Change



2

Risk Points

1 point for each missed target area in each applicable assessment area (with a maximum of **4 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.

Annual Performance Report (APR): 5A (apr5a)



1

Definition

LRE placement measurement for students with disabilities inside the regular class 80% or more per day; target was 74.92%.



2

Risk Points

at or above target (74.92%) is 0 points; 70-74.91% is 1 point; 60-69.99% is 3 points; below 60% is a maximum of **5 points**.



3

Significance

LEAs below target are at risk for not educating students with disabilities, to the maximum extent appropriate, with their non-disabled peers.



4

Mitigation Strategy

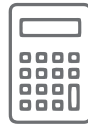
Review APR manual and data, attend relevant PD, ensure accurate data collection, IEP meetings, etc.

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.

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
- Incidents in which a parent was not notified on the same day as the incident



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.

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

Due Process Final Order Judgement **25**
1 Complaint; not FAPE: **10**
1 Complaint: FAPE: **25**
2+ Complaints: **25**



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.

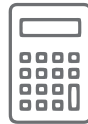
IDEA Due Process Resolution



1

Definition

convene a resolution session within 15 calendar days of receiving a due process complaint that meets the minimum filing requirements (7 calendar days of receiving an expedited)



2

Risk Points

LEAs that fail to offer to convene one or more due process resolution sessions within the required timelines receive **10 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.

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.

2025

**FEDERAL
PROGRAMS
INSTITUTE**

**MEMPHIS
TO
BRISTOL**

Federal Programs
Driving Local Change

Perkins V Sub-Category

Perkins V

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



Perkins V

- **Update:** CTE PD Allocation (CTEpdh)
 - In FY27, the definition will update to funds **expended** on professional development instead of allocated. A minimum of 5% of the total CTE Perkins Basic allocation must be expended on professional development.



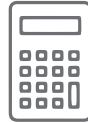
CTE PD Attendance (CTEPDA)



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.

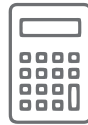
CTE Director Years of Experience (CTExp)



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.

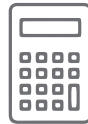
CTE PD Allocation (CTE PDH)



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.

2025

**FEDERAL
PROGRAMS
INSTITUTE**

**MEMPHIS
TO
BRISTOL**

Federal Programs
Driving Local Change

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



Changes/Improvements in FY26

- Updated

- ePlan Budget Deadline (ebd)
 - LEAs that miss the October 1 submission deadline for the original State Funds budget risk having funds withheld.

- Updated

- CFA and State Funds FEW Deadline (sfFER)
 - LEAs must complete and fully submit (Authorized Rep submitted) the CFA (Aug. 15) and State Funds (Oct. 1) Final Expenditure Reports by the deadline to ensure data is available to the department for timely state reporting and state calculations, which can impact Federal funding.

- Update

- Perkins V Drawdown (CTEdraw)
 - LEAs with less than the required drawdown percentage per quarter receive 15 points. (By Oct. 31: 25% or greater; By Dec. 31, Quarter 2: 50% or greater; By March 31, Quarter 3: 65% or greater; By June 30, Quarter 4: 100% [up to a \$100 variance])



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 exhibit financial risk may be issued audit findings, which are documented in their Annual Financial Reports. For 81 Act counties and other centralized finance departments, all school-related audit findings will be applied to the LEA. LEAs for which an Annual Financial Report is not available on the comptroller's website as of June 30, 2025, will receive the maximum points.



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 county or city centralized finance office are at additional risk because of a lack of fiscal control due to county/city finance personnel who 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

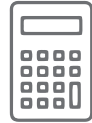
All Awards



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 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

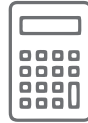
All Drop Dead/Release of/Unexpended Funds



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.

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.

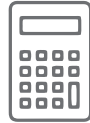
Perkins V Drawdown



1

Definition

Quarterly drawdown of Perkins Basic funds at 20, 50, 65, and 100 percent per quarter is expected so that LEAs spend down funds on fund generators (students who generated funds).



2

Risk Points

< required percentage drawdown for any 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).

All Deadlines

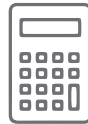


1

Definition

LEAs that miss the October 1 submission deadline for the original State Funds budget risk having funds withheld.

LEAs must complete and fully submit (Authorized Rep submitted) the CFA (Aug. 15) and State Funds (Oct. 1) Final Expenditure Reports by the deadline to ensure data is available to the department for timely state reporting and state calculations, which can impact Federal funding.



2

Risk Points

Miss final budget deadline= **10 points; Max 10**

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.

2025

**FEDERAL
PROGRAMS
INSTITUTE**

**MEMPHIS
TO
BRISTOL**

Federal Programs
Driving Local Change

Cross-Cutting Sub-Category

Cross-Cutting

- Designations
- ESSA/IDEA/CTE 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.

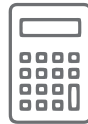
In Need of Improvement Schools



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.

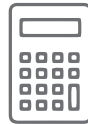
TN OCR Findings



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.

2025

**FEDERAL
PROGRAMS
INSTITUTE**

**MEMPHIS
TO
BRISTOL**

Federal Programs
Driving Local Change

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.

LEAs that have not been monitored via Level 3 in 10+ years receive **10 points per year with no limit on maximum points**



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.

2025

**FEDERAL
PROGRAMS
INSTITUTE**

**MEMPHIS
TO
BRISTOL**

Federal Programs
Driving Local Change

Common Questions



Common Questions

- I removed X's role after you ran this report. Can you reduce my score?
- We hired a new person for the X role, but they did not start until after July 1. Does that mean we don't get points for a new director?
- I didn't mean to have ESSA and IDEA directors listed. Can I take one off and you remove my points?
- Did any other LEAs do worse than us? Who?
- 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?



2025

**FEDERAL
PROGRAMS
INSTITUTE**

**MEMPHIS
TO
BRISTOL**

Federal Programs
Driving Local Change

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.
- 2. The LEAs receiving the largest allocations (Davidson, Hamilton, Knox, and Shelby) participate in either Level 2 or 3, depending on total risk score.

Business Rules

3. LEAs that completed Level 3 in the previous fiscal year are excluded and assigned Level 1.
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.

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 five years.
- 6. The LEA with the highest score in the ESSA subcategory eligible for monitoring is identified for Level 3.



Business Rules

7. The LEA with the highest score in the IDEA subcategory eligible for monitoring is identified for Level 3.
8. The LEA with the highest score in the Perkins subcategory eligible for monitoring is identified for Level 3.

Business Rules

- 9. The LEA with the highest score in the Fiscal subcategory eligible for monitoring is identified for Level 3.
- 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.



Business Rules

- 11. At least 10% of LEAs receiving funds via the CFA are identified for (virtual) Level 3.
- 12. For LEAs that have not been monitored in the previous 7 years via Level 3 or Level 2, LEAs are identified for at least Level 2 monitoring.
- 13. Between Level 3 and Level 2, at least 20% of LEAs are identified.



Business Rules

- 14. 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.
- 15. All remaining LEAs are identified for Level 1.



Questions?



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>



Thank You!

Geneva.Taylor@tn.gov; 615-580-2039

Michael.Gateley@tn.gov; 931-349-7097



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 the materials for reasons other than non-commercial educational purposes, please contact the office of general counsel at (615) 741-2921.

