



Department of
Education

FY27 Results-Based Monitoring Risk Analysis Guide

Data Factors, Business Rules, and Process

Tennessee Department of Education | July 2026

Table of Contents

Results-Based Monitoring: Risk Analysis Overview	4
Introduction to the FY27 Results-Based Monitoring Risk Analysis	4
New and Updated in FY27	4
Identification via Risk Analysis	4
Instructions.....	4
Risk Analysis Data Factors.....	5
Risk Analysis Committees.....	5
Identification Process.....	5
Every Student Succeeds Act (ESSA) Subcategory	6
<i>Updated:</i> Subgroup Data: English Learners (sgEL)	6
<i>Updated:</i> Subgroup Data: Students in Foster Care (sgFC)	6
<i>Updated:</i> Subgroup Data: Students Experiencing Homelessness (sgH).....	6
<i>Updated:</i> Subgroup Data: Immigrant Students (sgI)	7
<i>Updated:</i> Subgroup Data: Migratory Students (sgM)	7
<i>Updated:</i> Subgroup Data: Military Dependents (sgMD).....	7
ESSA Complaints with Findings (ESSAcomp).....	7
<i>Updated:</i> WIDA Growth Rate (WIDAgr).....	8
<i>Updated:</i> English Learner Graduation Rate (ELgr).....	8
<i>Updated:</i> Foster Care Graduation Rate (FCgr).....	8
ESSA Results-Based Monitoring Action Steps (ESSARBM).....	9
ESSA Director Years of Experience (ESSAxp).....	9
ESL Director Years of Experience (ESLxp).....	9
Individuals with Disabilities Education Act (IDEA) Subcategory	10
Annual Performance Report (APR): Final Score (%) (apr)	10
<i>New:</i> Annual Performance Report (APR): Determination Level (aprdl)	10
Annual Performance Report (APR): 5A (apr5a).....	11
Significant Disproportionality (sigdis)	11
LEA-Level Isolation/Restraint Incidents (isores)	12
IDEA Complaints Findings and Due Process Final Orders (IDEAcomp).....	12
IDEA Due Process Resolution (IDEAdue)	12
IDEA Director Years of Experience (IDEAxp)	13
IDEA Results-Based Monitoring Actions Steps (IDEARBM).....	13
IEP Monitoring Risk (IEPmr).....	13
Perkins V	14
CTE PD Attendance (CTEpda)	14
CTE Results-Based Monitoring Actions Steps (CTErbm).....	14
CTE Director Years of Experience (CTExp).....	14
<i>Updated:</i> CTE PD Allocation (CTEpdh)	14
Fiscal.....	15
Single Audit Findings or Single Audit Not Required (>\$750K) (saf).....	15

Annual Financial Report Findings (fmf).....	15
Centralized Finance Office (cfo).....	15
CFA Preliminary Award (CFAa).....	15
ESEA Bookkeeper Years of Experience (ESSAbxp)	16
ESEA Expired/Release of Funds (ESSAdr)	16
ESSA Excess Carryover (ESSAec)	16
IDEA Bookkeeper Years of Experience (ESSAbxp).....	16
IDEA Expired/Release of Funds (IDEAdr)	16
IDEA Excess Carryover (IDEAec).....	17
Perkins V Basic Preliminary Allocation (CTEa).....	17
Perkins V Basic Unexpended/Release of Funds (CTEdr)	17
Perkins V Drawdown (CTEdraw)	17
CFO/Treasurer Experience (CFOTxp)	17
ePlan Budget Deadline (ebd)	18
<i>Updated: CFA, Perkins Basic, and State Funds FER Deadline (sfFER)</i>	18
Cross-Cutting	19
Priority and Comprehensive Support and Improvement (CSI) Schools (ps or csi)	19
In Need of Improvement Schools (ini)	19
ESEA/IDEA/CTE/DOS Director Same Person (eicds)	19
TN OCR Findings (ocr)	19
Director of Schools' Years of Experience (dos)	19
Years Since Last Monitored via Level 3 (Formerly On-Site)	20
ESEA/IDEA/ESSER Program Monitoring Years (eimy).....	20
Perkins V Program Monitoring Years (pvmy).....	20
Fiscal Monitoring Years (fmy).....	20
Risk Analysis Process and Business Rules	21
Results-Based Monitoring Risk Analysis Business Rules:.....	21
School Identification Business Rules:	22
Resources and Points of Contact	23
Resources	23
Points of Contact	23

Results-Based Monitoring: Risk Analysis Overview

Introduction to the FY27 Results-Based Monitoring Risk Analysis

Beginning in FY22, the Results-Based Monitoring Risk Analysis is embedded in [ePlan](#) under the **Data and Information** tab for all LEAs to view. For transparency purposes, this guide was also created to use as a companion to the risk analysis results to better understand the definition, read examples for some of the more complex data included, the number of points assigned to each data element, a fiscal or school year from where the data originated, and a point of contact if there are additional questions.

New and Updated in FY27

All risk analysis items are advanced to the most current fiscal year available each year unless otherwise noted within this guide. New and updated factors with significant adjustments are marked as such.

Identification via Risk Analysis

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

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

Instructions

ESSA, IDEA, CTE, or Fiscal Directors or the Director of Schools must acknowledge the FY27 Risk Analysis results. The director of schools must mark the results as [LEA Reviewed](#). To do so, please:

1. Log into ePlan.
2. Click **Data and Information** on the left menu.
3. Under FY27, select **Results-Based Monitoring Risk Analysis**.
4. On the [Sections](#) page, click [Draft Started](#) and confirm the status change to view results.
5. From [Sections](#), view the [Risk Analysis](#) page to review the data information.
6. Return to the [Sections](#) page, then click the [Acknowledgement](#) page.
 - a. Choose the preferred option. If *Acknowledge* is selected, skip to Step 7.
 - b. If *Appeal* is selected, please include a detailed statement for department review.
7. From the [Sections](#) page, click [Draft Completed](#) to complete the review process.
8. From the [Sections](#) page, the Director of Schools (Authorized Representative) must click [LEA Reviewed](#) to complete the review process.

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

Risk Analysis Data Factors

As part of the requirements to receive and distribute Federal funds for State Educational Agencies (SEAs), also known as pass-through entities, the department must conduct a risk analysis according to 2 C.F.R. § 200.332. The department must, as part of the risk evaluation, consider prior experience with similar awards, results of previous audits, new personnel, or substantial changes to the subrecipient's systems, and results for other monitoring processes.

Through the monitoring process, the department reviews financial (OCFO) and programmatic (FPO) reports; ensures corrective action (*Monitoring Results*) by reviewing, providing feedback on, and approving proof of implementation documentation; and issuing a management decision on audit findings (approval/non-approval).

Risk Analysis Committees

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

Goals of the Risk Analysis subcommittees are to:

- simplify the risk analysis,
- remove categories that have little impact,
- add relevant categories as they become available,
- simplify the calculation process, and,
- continue to update the process in ePlan for additional transparency and ease of recordkeeping purposes.

Identification Process

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

1. Invite participants to subcommittees.
2. Discuss challenges; propose deletion or moving items to other categories.
3. Review proposals; Discuss solutions to challenges.
4. Review calculation template; Refine calculation and risk factors.
5. Refine calculation and risk factors with sample/previous data to confirm the process; provide an outline to ePlan vendor; gather Overall Approval Committee to discuss changes and seek approval.
6. Discuss template and any adjustments Overall Approval Committee proposed.
7. Research and finalize data sources; make data requests.
8. Data pull; sign-off on data retrieval
9. Training FPO/OCFO staff on risk calculations; proof of attendance
10. LEA Notifications and Risk Analysis Access; Acknowledge or Appeal

Every Student Succeeds Act (ESSA) Subcategory

Updated: Subgroup Data: English Learners (sgEL)

Definition: This metric measures the consistency of English learner (EL) enrollment data reported by LEAs. Risk is assigned when the number of students with L or W English language background classifications enrolled in grades K-12 on Oct. 1 changes by 10 percent or more and by at least two students between FPO's Oct. 1 enrollment count and FPO's year-end data analysis. The data include students with the L and W English language background classifications who were enrolled in grades K-12 on Oct. 1, 2024, as of the pull dates.

Data Note: The comparison uses FPO's Oct. 1 EL count (October pull) and FPO's year-end EL count (June pull) to identify significant changes in EL counts. The percent change is calculated by dividing the difference in EL counts by the Oct. 1 EL count.

Fiscal or School Year: FY25

Points: LEAs can receive a maximum of **10 points** in this area.

Contact: Teri.Manning@tn.gov, Hannah.Gribble@tn.gov or [assigned FPO divisional coordinator](#)

Updated: Subgroup Data: Students in Foster Care (sgFC)

Definition: This metric measures year-to-year changes in the percentage of students identified as being in foster care relative to total district enrollment. Risk is assigned when the foster care rate changes by 50 percent or more between SY2023-24 and SY2024-25.

Data Note: The foster care rate is calculated by dividing the number of students identified with the **FOS01-foster care** classification by the total district enrollment for the school year. The comparison uses students enrolled in grades P3-12 at any time during SY2023-24 and SY2024-25. Students with multiple enrollments are counted once per LEA. The percent change compares the SY2024-25 foster care rate to the SY2023-24 foster care rate.

Fiscal or School Year: SY2023-24 and SY2024-25

Points: LEAs can receive a maximum of **10 points** in this area.

Contact: Teri.Manning@tn.gov, Jackie.Jacobson@tn.gov or [assigned FPO divisional coordinator](#)

Updated: Subgroup Data: Students Experiencing Homelessness (sgH)

Definition: This metric measures year-to-year changes in the percentage of students identified as homeless relative to total district enrollment. Risk is assigned when the homeless student rate changes by 50 percent or more between SY2023-24 and SY2024-25.

Data Note: The homeless student rate is calculated by dividing the number of students identified with the **H-homeless** classification by the total district enrollment for the school year. The comparison uses students enrolled in grades P3-12 at any time during SY2023-24 and SY2024-25. Students with multiple enrollments are counted once per LEA. The percent change compares the SY2024-25 homeless student rate to the SY2023-24 homeless student rate.

Fiscal or School Year: SY2023-24 and SY2024-25

Points: LEAs can receive a maximum of **10 points** in this area.

Contact: Teri.Manning@tn.gov, Vanessa.Waters@tn.gov or [assigned FPO divisional coordinator](#)

Updated: Subgroup Data: Immigrant Students (sgI)

Definition: This metric evaluates the accuracy of country of birth data reported for immigrant students. Risk is assigned when 10 percent or more of immigrant students, and at least two immigrant students, have a missing or invalid country of birth value at the end of the school year. Invalid country of birth values include null, Puerto Rico, or U.S. entries. Immigrant students are students for whom the immigrant field is reported as "Yes" in TEDS.

Data Note: The data include students enrolled in grades P3-12 at any time during the 2024-25 school year. Students with multiple enrollments are counted once per LEA. Missing or invalid country of birth values include null, Puerto Rico, or U.S. entries.

Fiscal or School Year: FY25

Points: LEAs can receive a maximum of **10 points** in this area.

Contact: Teri.Manning@tn.gov, Vanessa.Waters@tn.gov, [assigned FPO divisional coordinator](#)

Updated: Subgroup Data: Migratory Students (sgM)

Definition: This metric evaluates the accuracy of the **I-migrant student** classification reported by LEAs. Risk is assigned when corrections needed to migrant student classifications affect **10 percent or more** of total migratory records and involve **at least two students** at the end of the school year.

Data Note: Corrections to the **I-migrant student** classification are identified through the migrant student lists posted monthly on the TNMigrant website for students enrolled in grades P3-12 at any time during the 2024-25 school year. The final available report for the school year is used to calculate this metric.

Fiscal or School Year: FY25

Points: LEAs can receive a maximum of **10 points** in this area.

Contact: Teri.Manning@tn.gov, Hannah.Gribble@tn.gov, [assigned FPO divisional coordinator](#)

Updated: Subgroup Data: Military Dependents (sgMD)

Definition: This metric measures year-to-year changes in the percentage of military dependent students relative to total district enrollment. Risk is assigned when the military dependent student rate changes by **50 percent or more** between SY2023-24 and SY2024-25.

Data Note: The military dependent student rate is calculated by dividing the number of students identified with the **4 (Active-Duty Military Dependent)** or **5 (National Guard Military Dependent)** classification by the total district enrollment for the school year. The comparison uses students enrolled in grades P3-12 at any time during SY2023-24 and SY2024-25. Students with multiple enrollments are counted once per LEA. The percent change compares the SY2024-25 military dependent student rate to the SY2023-24 military dependent student rate.

Fiscal or School Year: SY2023-24 and SY2024-25

Points: LEAs can receive a maximum of **10 points** in this area.

Contact: Teri.Manning@tn.gov, [assigned FPO divisional coordinator](#)

ESSA Complaints with Findings (ESSAcomp)

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

Fiscal or School Year: FY26

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

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

Updated: WIDA Growth Rate (WIDAgr)

Definition: Risk is assigned when the percentage of English learners meeting the WIDA growth standard is **25 percent or less** and **10 or more English learners** have WIDA test scores for two years.

Data Note: The WIDA growth data were obtained from EDFacts File FS139, English Language Proficiency Results, for the 2023-24 school year. FS139 was prepared by the department's accountability team. The 25 percent threshold is a fixed benchmark and is not based on a state average.

Fiscal or School Year: FY24

Points: LEAs can receive a maximum of **15 points** in this area.

Contact: Teri.Manning@tn.gov, Hannah.Gribble@tn.gov, or [assigned FPO divisional coordinator](#)

Updated: English Learner Graduation Rate (ELgr)

Definition: Risk is assigned when the graduation rate for English Learner students is **65 percent or less** and the English Learner graduation cohort includes **five or more students**.

Data Note: The English Learner graduation cohort and graduation rate data were obtained from EDFacts Files FS150, Adjusted Cohort Graduation Rate, and FS151, Cohorts for Adjusted Cohort Graduation Rate, for the 2023-24 school year. FS150 and FS151 were prepared by the department's accountability team using graduation cohort data. Students identified as English learners, including students with the **L** and **W** English language background classifications, at any time during high school are included in the English Learner graduation cohort. The 38 percent threshold is a benchmark and not based on a state average.

Fiscal or School Year: FY24

Points: LEAs can receive a maximum of **15 points** in this area.

Contact: Teri.Manning@tn.gov, Hannah.Gribble@tn.gov, or [assigned FPO divisional coordinator](#)

Updated: Foster Care Graduation Rate (FCgr)

Definition: The foster care graduation rate risk is assigned when the graduation rate for foster care students is **65 percent or less** and the foster care graduation cohort includes **five or more students**.

Data Note: The foster care graduation cohort and graduation rate data were obtained from EDFacts Files FS150, Adjusted Cohort Graduation Rate, and FS151, Cohorts for Adjusted Cohort Graduation Rate, for the 2023-24 school year. FS150 and FS151 were prepared by the department's accountability team using graduation cohort data. Students identified as foster care at any time during high school are included in the foster care graduation cohort. The 36 percent threshold is a benchmark and not based on a state average.

Fiscal or School Year: FY24

Points: LEAs can receive a maximum of **15 points** in this area.

Contact: Teri.Manning@tn.gov, Jackie.Jacobson@tn.gov, or [assigned FPO divisional coordinator](#)

Updated: Homeless Graduation Rate (Hgr)

Definition: Risk is assigned when the graduation rate for homeless students is **65 percent or less** and the homeless graduation cohort includes **five or more students**.

Data Note: The homeless graduation cohort and graduation rate data were obtained from EDFacts files FS150-Adjusted Cohort Graduation Rate and FS151-Cohorts for Adjusted Cohort Graduation Rate, for the 2023-24 school year. FS150 and FS151 were prepared by the department's accountability team using graduation cohort data. Students identified as homeless at any time during high school are included in the homeless graduation cohort. The 44 percent threshold is a benchmark and not based on a state average.

Fiscal or School Year: FY24

Points: LEAs can receive a maximum of **15 points** in this area.

Contact: Teri.Manning@tn.gov, Vanessa.Waters@tn.gov, or [assigned FPO divisional coordinator](#)

ESSA Results-Based Monitoring Action Steps (ESSARBM)

Definition: LEAs with ESEA-related Results-Based Monitoring Findings of Non-Compliance or Corrections Needed, as well as applicable JDC/N&D results, from the most recent complete monitoring cycle receive points for this area.

Fiscal or School Year: FY26

Points: LEAs receive **2 points** for each action step identified, up to a maximum of **20 points**.

Source: ePlan.tn.gov > Results-Based Monitoring > FY26 > Monitoring Results – LEA Response

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

ESSA Director Years of Experience (ESSAxp)

Definition: This metric measures the experience level of the LEA's ESSA Director. ESSA Directors are required to report their years of experience in their role within Tennessee upon submission of the Consolidated Funding Application (CFA) each year. For LEAs with multiple staff members listed, points are assigned based on the staff member with the least experience.

Fiscal or School Year: FY27

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

Source: ePlan.tn.gov > Funding Applications > FY27 CFA > Contacts

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

ESL Director Years of Experience (ESLxp)

Definition: This metric measures the experience level of the LEA's ESL Director. ESL Directors are required to report their years of experience in the role within Tennessee upon submission of the Consolidated Funding Application (CFA) each year. For LEAs with multiple staff members listed, points are assigned based on the staff member with the least experience.

Fiscal or School Year: FY27

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

Source: ePlan.tn.gov > Funding Applications > FY27 CFA > Contacts

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

Individuals with Disabilities Education Act (IDEA) Subcategory

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

Definition: Under the Individuals with Disabilities Education Act (IDEA), states are required to compile aggregate and LEA-level data on indicators that measure implementation of special education programs. Targets for these indicators are collaboratively set by the department and stakeholder groups, including the Governor's Advisory Council for the Education of Students with Disabilities. The department annually calculates an APR Final Score for each LEA using results and compliance data from the APR indicators included in APR Local Determinations. The APR Final Score provides a numerical measure of the LEA's performance across applicable indicators, including data related to identification and timely evaluation of students with disabilities (SWDs), educational environments of SWDs, achievement of SWDs, discipline of SWDs, involvement of parents of SWDs, and post-school outcomes of SWDs.

Fiscal or School Year: FFY24 (2024-25 SY)

Points: LEAs can receive a maximum of **50 points** in this area. Points are calculated using the inverse of the APR Final Score (%).

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

Source: Click [here](#) to learn more about the Annual Performance Report. The FFY24 (2024-25 SY) matrix and historical matrices can be found in ePlan (ePlan.tn.gov > FY26 LEA Doc Library > Annual Performance Report (APR) Local Determinations).

Contact: IDEA.Data.Support@tn.gov

New: Annual Performance Report (APR): Determination Level (aprdl)

Definition: Under the IDEA, the department annually evaluates each LEA's implementation of IDEA, Part B, requirements using results and compliance data from 14 of the 18 APR indicators included in APR Local Determinations. These indicators provide information about identification and timely evaluation of SWDs, educational environments of SWDs, achievement of SWDs, discipline of SWDs, involvement of parents of SWDs, and post-school outcomes of SWDs. Based on this evaluation, each LEA receives one of four annual determinations: Meets Requirements (MR), Needs Assistance (NA), Needs Intervention (NI), or Needs Substantial Intervention (NSI).

Fiscal or School Year: FFY24 (2024-25 SY)

Points: LEAs can receive a maximum of **20 points** in this area. LEAs identified as Needs Assistance receive **5 points**; Needs Intervention (Three or More Consecutive Needs Assistance) receive **10 points**; Needs Intervention receive **15 points**; and Needs Substantial Intervention receive **20 points**.

Source: Click [here](#) to learn more about the Annual Performance Report. The FFY24 (2024-25 SY) matrix and historical matrices can be found in ePlan (ePlan.tn.gov > FY26 LEA Doc Library > Annual Performance Report (APR) Local Determinations).

Contact: IDEA.Data.Support@tn.gov

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

Definition: For LEAs not meeting the APR Local Determinations 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, there is risk that the LEA will not increase the percent of students scoring at or above approaching on statewide assessments by one percent or more annually. The target is +1.00% from the previous year's performance.

Fiscal or School Year: FFY24 (2024-25 SY)

Points: LEAs receive **1 point** for each missed target in an applicable assessment area, up to a maximum of **4 points**.

Contact: IDEA.Data.Support@tn.gov

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

Definition: Indicator 5A on the APR measures appropriate LRE placement for students with disabilities by examining the percentage of SWDs in the regular class 80% or more per day. The target is set for each year, and for the year listed below, the target was 77.20%. LEAs below this target are at risk for not educating students with disabilities, to the maximum extent appropriate, with their non-disabled peers.

Fiscal or School Year: FFY24 (2024-25 SY)

Points: LEAs at or above the target of **77.20 percent** receive **0 points**; LEAs with a rate of **70.00 to 77.19 percent** receive **1 point**; LEAs with a rate of **60.00 to 69.99 percent** receive **3 points**; and LEAs with a rate **below 60.00 percent** receive **5 points**.

Contact: IDEA.Data.Support@tn.gov

Significant Disproportionality (sigdis)

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

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

Fiscal or School Year: SY 2022-23, SY 2023-24, and SY 2024-25 data were used for FY26 determinations.

Points: LEAs receive **10 points** for each area of significant disproportionality identified, up to a maximum of **20 points**.

Source: Determination letters, data displays, and appeal documentation can be found in ePlan (ePlan.tn.gov > FY26 LEA Doc Library > Significant Disproportionality).

Contact: [assigned FPO divisional coordinator](#) or IDEA.Data.Support@tn.gov

LEA-Level Isolation/Restraint Incidents (isores)

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

- duplicate entries—multiple incidents with the same student, date, time, and incident type.
- missing date or time of parent notification
- date or time of parent notification occurring before the incident date/time
- student or staff death reported when no death occurred
- missing number of staff “Not Trained/Total Staff” entered as “0/0”
- isolation that exceeds 60 minutes
- restraint that exceeds 5 minutes
- incidents reported during non-school hours
- incidents in which a parent was not notified on the same day as the incident
- incidents finalized without a student disability
- incidents finalized more than five days after the incident

Fiscal or School Year: SY 2024-25

Points: LEAs with **0 percent** of incidents flagged receive **0 points**; LEAs with **less than 10 percent** of incidents flagged receive **3 points**; and LEAs with **10 percent or more** of incidents flagged receive **5 points**.

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

Contact: IDEA.Data.Support@tn.gov

IDEA Complaints Findings and Due Process Final Orders (IDEAcomp)

Definition: LEAs must follow all federal and state special education laws. Individuals may file an administrative complaint against the LEA alleging that the LEA failed to follow all federal and state special education laws. A student’s parents may file a due process complaint against an LEA alleging that the LEA failed to properly identify the student, evaluate the student, determine an appropriate educational placement for the student, or provide the student with a free appropriate public education.

Fiscal or School Year: FY26

Points: LEAs can receive a maximum of **50 points** in this area, which includes 25 points arising from due process complaints and 25 points arising from administrative complaints.

- If a due process final order results in a judgment against the LEA, the LEA receives **25 points**.
- If only one administrative complaint results in a determination against the LEA and the violation does not include a deprivation of FAPE, the LEA receives **10 points**.
- If only one administrative complaint results in a determination against the LEA and the violation includes a deprivation of FAPE, the LEA receives **25 points**.
- If more than one administrative complaint results in a determination against the LEA, the LEA receives **25 points**.

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

IDEA Due Process Resolution (IDEAduer)

Definition: LEAs must offer to convene a resolution session within 15 calendar days of receiving a due process complaint that meets the minimum filing requirements or 7 calendar days of receiving an expedited due process complaint that meets the minimum filing requirements.

Fiscal or School Year: FY26

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

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

IDEA Director Years of Experience (IDEAxp)

Definition: This metric measures the experience level of the LEA's IDEA Director. IDEA Directors are required to report their years of experience in the role within Tennessee upon submission of the Consolidated Funding Application (CFA) each year. For LEAs with multiple staff members listed, points are assigned based on the staff member with the least experience.

Fiscal or School Year: FY27

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

Source: ePlan.tn.gov > Funding Applications > FY27 CFA > Contacts

Contact: [assigned FPO divisional coordinator](#)

IDEA Results-Based Monitoring Actions Steps (IDEARBM)

Definition: LEAs with IDEA-related Results-Based Monitoring Findings of Non-Compliance or Corrections Needed, and applicable JDC/N&D results, from the most recent completed monitoring cycle receive points.

Fiscal or School Year: FY26

Points: LEAs receive **2 points** for each action step identified, up to a maximum of **20 points**.

Source: ePlan.tn.gov > Results-Based Monitoring > FY26 > Monitoring Results – LEA Response

Contact: [assigned FPO divisional coordinator](#)

IEP Monitoring Risk (IEPmr)

Definition: LEAs receive IEP Monitoring Results that include the number of findings requiring corrective actions and the total number of items reviewed for the LEA.

Fiscal or School Year: FY26

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**.

Source: [TN PULSE](#) > Compliance Monitoring > Monitoring Cohort (SEA Findings Column, Total Findings)

Contact: Laura.Dunn@tn.gov or Geneva.Taylor@tn.gov

Perkins V

CTE PD Attendance (CTEpda)

Definition: The SEA offers four meetings annually, and CTE directors are expected to attend. New CTE Directors must attend both the CTE Directors Meeting and New CTE Director Academy. LEAs are also expected to send a representative to regional CTE meetings which may vary in frequency in each region.

Fiscal or School Year: FY26

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

Contact: assigned CTE/CORE office contact

CTE Results-Based Monitoring Actions Steps (CTErmbm)

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

Fiscal or School Year: FY26

Points: LEAs receive **2 points** for each action step identified, up to a maximum of **20 points**.

Source: ePlan.tn.gov > CTE Results-Based Monitoring > FY26 > Monitoring Results – LEA Response

Contact: Michael.Gateley@tn.gov

CTE Director Years of Experience (CTExp)

Definition: This metric measures the experience level of the LEA's CTE Director. CTE Directors are required to report their years of experience in the role within Tennessee upon submission of the Consolidated Funding Application (CFA) each year. For LEAs with multiple staff members listed, points are assigned based on the staff member with the least experience.

Fiscal or School Year: FY27

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

Source: ePlan.tn.gov > Funding Applications > FY27 Perkins Basic > Eligibility > CTE Director Employment Matrix

Contact: [assigned CTE/CORE office contact](#)

Updated: CTE PD Allocation (CTEpdh)

Definition: LEAs must expend at least five percent of the Perkins Basic allocation for professional development aligned to the Tennessee Perkins V State Plan (72130 399PD & -524PD, and 72230-524) and the LEA CTE Perkins Basic local application.

Fiscal or School Year: FY26

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

Source: ePlan.tn.gov > Funding Applications > FY26 Perkins Basic > Budget

Contact: [assigned CTE/CORE office contact](#)

Fiscal

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

Definition: A single audit provides assurance to the U.S. government as to the management and use of the funds by the recipient, and the audit is completed by an independent auditor. As a companion to Single Audit (formerly A-133) Findings, this category also captures LEAs receiving less than \$750K in federal funds. Typically, the single audit provides assurance to the U.S. government as to the management and use of the funds by the recipient, and the audit is completed by an independent accountant. LEAs for which a single audit report is not available on the comptroller's website as of June 30, 2026, will receive the maximum points.

Fiscal or School Year: FY25

Points: LEAs with one or more findings receive **15 points**.

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

Annual Financial Report Findings (fmf)

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.

Fiscal or School Year: FY25

Points: LEAs receive **10 points** per finding **with a maximum of 50 points**.

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

Contact: Holly.Kellar@tn.gov

Centralized Finance Office (cfo)

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.

Fiscal or School Year: FY26

Points: LEAs that use a county or city centralized finance office receive **10 points**.

Contact: Holly.Kellar@tn.gov

CFA Preliminary Award (CFAa)

Definition: This metric measures the total grant allocation provided to an LEA through the Consolidated Funding Application, including IDEA funds reserved for mandatory CCEIS, as of July 1, 2026.

Fiscal or School Year: FY27

Points: LEAs receive **1 point** for each one million dollars, up to a maximum of **5 points**.

Source: ePlan.tn.gov > Funding Applications > FY27 CFA > Allocations

Contact: Kate.Smitheal@tn.gov

ESEA Bookkeeper Years of Experience (ESSAbxp)

Definition: This metric measures the experience level of the LEA's ESSA Bookkeeper. ESSA Bookkeepers are required to report their years of experience in the role within Tennessee upon submission of the Consolidated Funding Application (CFA) each year. For LEAs with multiple staff members listed, points are assigned based on the staff member with the least experience.

Fiscal or School Year: FY27

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

Source: ePlan.tn.gov > Funding Applications > FY27 CFA > Contacts

Contact: Geneva.Taylor@tn.gov

ESEA Expired/Release of Funds (ESSAdr)

Definition: LEAs with an excess of \$100 left unexpended at the end of the period (reverted to U.S. Treasury) or LEAs that released funds back to the department in any individual ESEA grant in the CFA.

Fiscal or School Year: FY24

Points: LEAs that drop or release \$100 or more in ESEA funds receive **5 points**.

Source: ePlan.tn.gov > Reimbursement Requests and Source: ePlan.tn.gov > Funding Applications > CFA > Allocations

Contact: Kate.Smitheal@tn.gov

ESSA Excess Carryover (ESSAec)

Definition: LEAs that carry over 50% or greater from the previous fiscal year in the *Original* allocated ESSA grants are at greater risk of not spending funds in a timely and appropriate manner.

Fiscal or School Year: FY25

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

Source: ePlan.tn.gov > Funding Applications > FY25 CFA > Sections > Reimbursements

Contact: Kate.Smitheal@tn.gov

IDEA Bookkeeper Years of Experience (ESSAbxp)

Definition: This metric measures the experience level of the LEA's IDEA Bookkeeper. IDEA Bookkeepers are required to report their years of experience in the role within Tennessee upon submission of the Consolidated Funding Application (CFA) each year. For LEAs with multiple staff members listed, points are assigned based on the staff member with the least experience.

Fiscal or School Year: FY27

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

Source: ePlan.tn.gov > Funding Applications > FY27 CFA > Contacts

Contact: Geneva.Taylor@tn.gov

IDEA Expired/Release of Funds (IDEAdr)

Definition: LEAs with an excess of \$100 left unexpended at the end of the period (reverted to U.S. Treasury) or LEAs that released funds back to the department in any individual IDEA grant in the CFA.

Fiscal or School Year: FY24

Points: LEAs that drop or release \$100 or more in IDEA funds receive **5 points**.

Source: ePlan.tn.gov > Reimbursement Requests and Source: ePlan.tn.gov > Funding Applications > CFA > Allocations

Contact: Kate.Smitheal@tn.gov

IDEA Excess Carryover (IDEAec)

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

Fiscal or School Year: FY25

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

Source: ePlan.tn.gov > Funding Applications > FY25 CFA > Sections > Reimbursements

Contact: Kate.Smitheal@tn.gov

Perkins V Basic Preliminary Allocation (CTEa)

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

Fiscal or School Year: FY27

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

Source: ePlan.tn.gov > Funding Applications > FY27 Perkins Basic > Allocations

Contact: Kate.Smitheal@tn.gov, FPO.Monitoring@tn.gov

Perkins V Basic Unexpended/Release of Funds (CTEdr)

Definition: LEAs with an excess of \$100 of Perkins V funds left unexpended at the end of the period of performance or LEAs that released funds back to the department.

Fiscal or School Year: FY25

Points: LEAs that let funds expire or release \$100 or more in Perkins V Basic funds receive **5 points**.

Source: ePlan.tn.gov > Reimbursement Requests and Source: ePlan.tn.gov > Funding Applications > Perkins Basic > Allocations

Contact: Kate.Smitheal@tn.gov

Perkins V Drawdown (CTEdraw)

Definition: Quarterly drawdown of Perkins Basic funds at a rate as described per quarter is expected so that LEAs spend down funds on fund generators (students who generated funds).

Fiscal or School Year: FY25

Points: LEAs with less than the required drawdown percentages per quarter receive **15 points**. (By Sep. 30: 25%; 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])

Source: ePlan.tn.gov > Reimbursement Requests > FY25 Perkins Basic

Contact: assigned CTE/CORE office contact

CFO/Treasurer Experience (CFOTxp)

Definition: This metric measures the experience level of the LEA's CFO/Treasurer. CFO/Treasurers are required to report their years of experience in the role within Tennessee upon submission of the Consolidated Funding Application (CFA) each year. For LEAs with multiple staff members listed, points are assigned based on the staff member with the least experience.

Fiscal or School Year: FY27

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

Contact: Geneva.Taylor@tn.gov

ePlan Budget Deadline (ebd)

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

Fiscal or School Year: FY26

Points: LEAs that miss the final budget deadline receive **10 points**.

Source: ePlan.tn.gov > Funding Applications > FY26 > State Funds Application

Contact: Holly.Kellar@tn.gov

Updated: CFA, Perkins Basic, and State Funds FER Deadline (sfFER)

Definition: LEAs must complete and fully submit (Authorized Rep submitted) the CFA (Aug. 15), Perkins Basic (Oct. 1), 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.

Fiscal or School Year: FY25

Points: LEAs receive **10 points** for each missed CFA, Perkins Basic, or State Funds FER deadline, up to a maximum of **30 points**.

Source: ePlan.tn.gov > Funding Applications > FY25 > (Appropriate Funding Application)

Contact: Holly.Kellar@tn.gov

Cross-Cutting

Priority and Comprehensive Support and Improvement (CSI) Schools (ps or csi)

Definition: Please see the School Accountability website below.

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

Points: LEAs with a Priority or Comprehensive Support and Improvement (CSI) school identified on the School Accountability website receive **15 points**.

Source: [2024-25 School Designation Lists](#)

Contact: [assigned FPO divisional coordinator](#)

In Need of Improvement Schools (ini)

Definition: Please see the School Accountability website below.

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

Points: LEAs with a Targeted Support and Improvement (TSI) or Additional Targeted Support and Improvement (ATSI) school identified on the School Accountability website receive **15 points**.

Source: [2024-25 School Designation Lists](#)

Contact: [assigned FPO divisional coordinator](#)

ESEA/IDEA/CTE/DOS Director Same Person (eicds)

Definition: This metric measures whether key federal program leadership and fiscal responsibilities are concentrated in a single individual. An LEA is identified when the same person is assigned responsibility for two or more of the following programs or roles: ESSA, IDEA, CTE, fiscal director/representative, and/or Director of Schools, as reported in the Address Book and/or Consolidated Funding Application (CFA).

Fiscal or School Year: FY27

Points: LEAs receive **10 points** if the same individual is listed in any combination of the following roles: ESEA director, IDEA director, CTE director, fiscal director/representative, and/or Director of Schools in the Address Book and/or CFA.

Data Note: The fiscal director/representative and Director of Schools roles can never be shared by the same individual per FPO business rules.

Source: [ePlan.tn.gov > Funding Applications > FY27 CFA > Contacts](#) or [ePlan.tn.gov > Address Book](#)

Contact: [assigned FPO divisional coordinator](#)

TN OCR Findings (ocr)FPO

Definition: If the Tennessee Department of Education Office for Civil Rights determines an LEA failed to comply with federal civil rights laws and regulations, the LEA is required to take corrective action to resolve the issues of non-compliance.

Fiscal or School Year: FY26

Points: LEAs with a civil rights investigation that results in a finding of non-compliance receive **10 points**.

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

Director of Schools' Years of Experience (dos)

Definition: This metric measures the experience level of the LEA's Director of Schools. Directors of Schools are required to report their years of experience in the role within Tennessee upon submission of the Consolidated Funding Application (CFA) each year.

Fiscal or School Year: FY27

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

Contact: [assigned FPO divisional coordinator](#)

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

ESEA/IDEA/ESSER Program Monitoring Years (eimy)

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

Fiscal or School Year: through FY26

Points: LEAs receive **10 points** for each year since their last Level 3 monitoring. There is **no maximum point value** in this area.

Contact: FPO.Monitoring@tn.gov

Perkins V Program Monitoring Years (pvmy)

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

Fiscal or School Year: FY20-FY26

Points: **5 points** for each year since last Level 3 monitored with **no limit on maximum points**.

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

Contact: FPO.Monitoring@tn.gov

Fiscal Monitoring Years (fmy)

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

Fiscal or School Year: through FY26

Points: LEAs receive **5 points** for each year since last Level 3 monitored with **no limit on maximum points**.

Contact: FPO.Monitoring@tn.gov

Risk Analysis Process and Business Rules

For the FY27 Risk Analysis, all subtotals are added together to determine a total score for LEAs. LEAs are then sorted by score (from greatest to least) to determine which level of monitoring each LEA must complete. The following business rules are followed in sequence to determine the level via which each LEA completes Results-Based Monitoring.

Results-Based Monitoring Risk Analysis Business Rules:

1. At the department's discretion, LEAs focus monitored in the most recent two fiscal years or receive grant conditions complete Level 3 for the impacted grant(s) and/or title(s)/section(s) regardless of score.
2. The LEAs receiving the largest allocations (Hamilton County Schools, Knox County Schools, and Memphis-Shelby County Schools, and Metro Nashville Public Schools) participate in either Level 2 or 3 depending on total risk score.
3. At the department's discretion, LEAs identified as NSI through APR Local Determinations in the most recent fiscal year may be identified for Level 3, focus monitoring, and/or grant conditions for affected grants, regardless of score.
4. LEAs that completed Level 3 in the previous fiscal year are excluded and assigned Level 1.
5. As other state agencies are not subject to the same reporting and data collection, the Tennessee Department of Children's Services, Tennessee Public Charter School Commission, and Tennessee Department of Correction participate in Level 3 at least every five years.
6. State-run schools (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.
7. The LEA with the highest score in the ESEA subcategory eligible for monitoring is identified for Level 3.
8. The LEA with the highest score in the IDEA subcategory eligible for monitoring is identified for Level 3.
9. The LEA with the highest score in the Perkins subcategory eligible for monitoring is identified for Level 3.
10. The LEA with the highest score in the Fiscal subcategory eligible for monitoring is identified for Level 3.
11. 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.
12. For LEAs that have not been monitored in the previous 5 or more years via Level 2 **and** 10+ years via Level 3, LEAs are identified for Level 3 monitoring.
13. At least 10% of LEAs receiving funds via the CFA are identified for Level 3.
14. For LEAs that have not been monitored in the previous 6 years via Level 3 or Level 2, LEAs are identified for at least Level 2 monitoring.
15. Between Level 3 and Level 2, at least 20% of LEAs are identified.
16. One or more LEAs not monitored in person within the past three years may be randomly selected for Level 3 before Levels 2 and 1 are determined.
17. All remaining LEAs are identified for Level 1.

School Identification Business Rules:

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

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

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

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

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

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

Resources and Points of Contact

Resources

[FPO Assigned Divisional Coordinator Map](#)

[OCFO Assigned Consultant Map](#)

[ePlan TDOE Resources: Monitoring Folder](#)

Points of Contact

FPO.Monitoring@tn.gov

Geneva Taylor, *Senior Director of Compliance*

Geneva.Taylor@tn.gov

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Teri.Manning@tn.gov

Michael Gateley, *Director of Perkins Compliance*

Michael.Gateley@tn.gov

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Kiyah.Moore@tn.gov