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2026 Federal Programs Institute

# Trail Markers and Warning Signs: Navigating RBM Risk Analysis

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*Federal Programs and Oversight*

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# Agenda

- 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



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# Overview

# Why is a risk analysis required?

- The Tennessee Department of Education (department) must:
  - **conduct a risk analysis,**
  - **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.

*2 C.F.R. § 200.331 [Education Department General Administrative Regulations (EDGAR)]*

# Common Terms

- **Level:** One of three Results-Based Monitoring (RBM) processes
  - **Level 3:** LEAs earning **significant** risk on the risk analysis, business rules 1-13 (excluding 4)
  - **Level 2:** LEAs earning **elevated** risk on risk analysis
  - **Level 1:** LEAs earning a **low** risk on the risk analysis
- **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

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# ESSA

# Updated: Subgroup Data: English Learners

## *Definition, Source, and Mitigation Strategy*



1

### Definition

flag for LEAs in which the number of English learners enrolled on Oct. 1 increased or decreased by 10% or more and by 2 or more students between Oct. 1 and year-end data analysis.



2

### Source

Oct. 1 count and year-end data analysis.



3

### Strategy

Ensure data is accurate.  
Connect with your IT/SIS POC if you notice an issue.



# Updated: Subgroup Data: English Learners

## *Point of Contact, Points and Example, and Counter*



4

### POC

Teri Manning  
Hannah Gribble



5

### Points and Example

10 points if the LEA does not meet the metric.

*30 students have an L or W class on Oct. 1; Only 25 are reported at end of year. The decrease was 16%.*

Point Counter (Avg):

3.7

Point Counter (Max):

10

# Updated: Subgroup Data: Students in Foster Care

## *Definition, Source, and Mitigation Strategy*



1

### Definition

% of foster care students relative to total district enrollment changes by 50% or more between SY2023-24 and SY2024-25.



2

### Source

SIS/SWORD report of FOS01 data for P3-12 students between school years



3

### Strategy

Ensure data is accurate.  
Connect with your IT/SIS POC if you notice an issue.

# Updated: Subgroup Data: Students in Foster Care

## *Point of Contact, Points and Example, and Counter*



4

### POC

Teri Manning  
Jackie Jacobson



5

### Points and Example

10 points if the LEA does not meet the metric.

**Foster care rate was 0.2% in SY2023-24 (10 of 5,000 enrolled) and 0.5% in SY2024-25 (25 of 5,000). The rate increased by 150%.**

**Point Counter (Avg):**

**5.4**

**Point Counter (Max):**

**20**

# Updated: Subgroup Data: Students Experiencing Homelessness (sgH)

## *Definition, Source, and Mitigation Strategy*



1

### **Definition**

% of students experiencing homelessness relative to total district enrollment changes by 50% or more between SY2023-24 and SY2024-25.



2

### **Source**

SIS/SWORD report of "H" data for P3-12 students between school years



3

### **Strategy**

Ensure data is accurate.  
Connect with your IT/SIS POC if you notice an issue.

# Updated: Subgroup Data: Students Experiencing Homelessness (sgH)

*Point of Contact, Points and Example, and Counter*



4

## POC

Teri Manning  
Vanessa Waters



5

## Points and Example

10 points if the LEA does not meet the metric.

Homeless student rate was 1.0% in SY2023-24 (50 of 5,000) and 0.4% in SY2024-25 (20 of 5,000 enrolled students). The rate decreased by 60%.

Point Counter (Avg):  7.5 Point Counter (Max):  30

# Updated: Subgroup Data: Immigrant Students

## *Definition, Source, and Mitigation Strategy*



1

### Definition

If 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

### Source

The data include students enrolled in grades P3-12 any time during the 2024-25 school year in TEDS.



3

### Strategy

Ensure data is accurate.  
Connect with your IT/SIS POC if you notice an issue.

# Updated: Subgroup Data: Immigrant Students

## *Point of Contact, Points and Example, and Counter*



4

### POC

Teri Manning  
Vanessa Waters



5

### Points and Example

10 points if the LEA does not meet the metric.

Immigrant students total 20, and two immigrant students have country of birth errors when data are pulled at the end of the school year.

Point Counter (Avg):

7.7

Point Counter (Max):

40

# Updated: Subgroup Data: Migratory Students:

## *Definition, Source, and Mitigation Strategy*



1

### Definition

Corrections needed in the I-migrant student classification affect 10% or more total migratory records and total two or more at the end of the school year.



2

### Source

I-migrant student classification corrections available monthly in TNMigrant



3

### Strategy

Ensure data is accurate.  
Connect with Arroyo POC if you notice an issue.



# Updated: Subgroup Data: Migratory Students

## *Point of Contact, Points and Example, and Counter*



4

### POC

Teri Manning  
Hannah Gribble



5

### Points and Example

10 points if the LEA does not meet the metric.

One correct, one who should have "I", and another with erroneous "I" flag, 2/3 students with mistakes

Point Counter (Avg):

8.6

Point Counter (Max):

50

# Updated: Subgroup Data: Military Dependents

## *Definition, Source, and Mitigation Strategy*



1

### Definition

Percentage of military dependent students, relative to total district enrollment, changes by 50% or more between SY2023-24 and SY2024-25.



2

### Source

Military dependent student identified with the 4 (Active-Duty Military Dependent) or 5 (National Guard Military Dependent) in TEDS



3

### Strategy

Ensure data is accurate.  
Connect with your IT/SIS POC if you notice an issue.

# Updated: Subgroup Data: Military Dependents

*Point of Contact, Points and Example, and Counter*



4

## POC

Teri Manning



5

## Points and Example

10 points if the LEA does not meet the metric.

Military dependent student rate was 0.4% in SY2023–24 (20 of 5,000 enrolled) and 0.8% in SY2024–25 (40 of 5,000 enrolled students). The rate increased by 100%.

Point Counter (Avg): **10.8** Point Counter (Max): **60**

# Updated: WIDA Growth Rate

## *Definition, Source, and Mitigation Strategy*



1

### Definition

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.



2

### Source

EDFacts File FS139;  
Department  
Accountability Team



3

### Strategy

Provide services to EL students; change strategies if data indicates lack of growth; reach out to department POCs

# Updated: WIDA Growth Rate

## *Point of Contact, Points and Example, and Counter*



4

### POC

Teri Manning  
Hannah Gribble  
FPO Coordinator



5

### Points and Example

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

Point Counter (Avg):

11.9

Point Counter (Max):

75

# Updated: Foster Care Graduation Rate

## *Definition, Source, and Mitigation Strategy*



1

### 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**.



2

### Source

EDFacts Files FS150, Adjusted Cohort Graduation Rate, and FS151, Cohorts for Adjusted Cohort Graduation Rate;  
Department Accountability Team



3

### Strategy

Early identification, academic support, graduation monitoring

# Updated: Foster Care Graduation Rate

## *Point of Contact, Points and Example, and Counter*



4

### POC

Teri Manning  
Jackie Jacobson  
FPO Coordinator



5

### Points and Example

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

Point Counter (Avg):

13.0

Point Counter (Max):

90

# Updated: English Learner Graduation Rate

## *Definition, Source, and Mitigation Strategy*



1

### Definition

Graduation rate for English Learner students is **65 percent or less** and the English Learner graduation cohort includes **five or more students**.



2

### Source

EDFacts Files FS150, Adjusted Cohort Graduation Rate, and FS151, Cohorts for Adjusted Cohort Graduation Rate, Department Accountability Team



3

### Strategy

Early identification, academic support, graduation monitoring



# Updated: English Learner Graduation Rate

## *Point of Contact, Points and Example, and Counter*



4

### POC

Teri Manning  
Hannah Gribble  
FPO Coordinator



5

### Points and Example

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

Point Counter (Avg):

13.4

Point Counter (Max):

105

# Updated: Homeless Graduation Rate

## *Definition, Source, and Mitigation Strategy*



1

### 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**.



2

### Source

EDFacts Files FS150, Adjusted Cohort Graduation Rate, and FS151, Cohorts for Adjusted Cohort Graduation Rate; Department Accountability Team



3

### Strategy

Early identification, academic support, graduation monitoring

# Updated: Homeless Graduation Rate

## *Point of Contact, Points and Example, and Counter*



4

### POC

Teri Manning  
Vanessa Waters  
FPO Coordinator



5

### Points and Example

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

Point Counter (Avg):

14.5

Point Counter (Max):

120

# ESSA Complaints with Findings

## *Definition, Source, and Mitigation Strategy*



1

### Definition

If an investigation results in findings in the most recent complete fiscal year regarding ESSA program implementation...



2

### Source

A program coordinator investigated and documented the issue...



3

### Strategy

Attend Office Hours, state and Federal meetings and webinars, update processes

# ESSA Complaints with Findings

## *Point of Contact, Points and Example, and Counter*



4

### POC

Brinn Obermiller  
FPO Coordinator



5

### Points and Example

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

Point Counter (Avg):

14.5

Point Counter (Max):

120

# ESSA Results-Based Monitoring Action Steps

## *Definition, Source, and Mitigation Strategy*



1

### Definition

LEAs with ESEA-related Results-Based Monitoring Findings of Non-Compliance or Corrections Needed



2

### Source

FY26 Results-Based Monitoring Results



3

### Strategy

Review other LEA monitoring trends; conduct gap analysis in policies/practices; seek assistance from coordinators and consultants

# ESSA Results-Based Monitoring Action Steps

## *Point of Contact, Points and Example, and Counter*



4

### POC

Geneva Taylor  
FPO Coordinator  
Fiscal Consultant



5

### Points and Example

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

Point Counter (Avg):

17.7

Point Counter (Max):

140

# ESSA Director Years of Experience

## *Definition, Source, and Mitigation Strategy*



1

### **Definition**

Years of experience in the role within Tennessee upon submission of the Consolidated Funding Application (CFA)



2

### **Source**

FY27 Consolidated Funding Application



3

### **Strategy**

None; Everyone has a first day in a new job. It increases risk of mistakes temporarily. It's okay!



# ESSA Director Years of Experience

*Point of Contact, Points and Example, and Counter*



4

## POC

FPO Coordinator  
Geneva Taylor



5

## Points and Example

3+ years of experience = **No points**

1-3 years of experience = **2 points**

Less than 1 year of experience = **5 points**

Point Counter (Avg):

18.4

Point Counter (Max):

145

# ESL Director Years of Experience

## *Definition, Source, and Mitigation Strategy*



1

### Definition

Years of experience in the role within Tennessee upon submission of the Consolidated Funding Application (CFA)



2

### Source

FY27 Consolidated Funding Application



3

### Strategy

None; Everyone has a first day in a new job. It increases risk of mistakes temporarily. It's okay!

# ESL Director Years of Experience

## *Point of Contact, Points and Example, and Counter*



4

### POC

FPO Coordinator  
Geneva Taylor



5

### Points and Example

3+ years of experience = **No points**

1-3 years of experience = **2 points**

Less than 1 year of experience = **5 points**

Point Counter (Avg): **19.1**

Point Counter (Max): **150**

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# IDEA

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

## *Definition, Source, and Mitigation Strategy*



1

### Definition

Performance measures for students with disabilities, including identification, evaluation, placement, achievement, discipline, parent involvement, and post-school outcomes.



2

### Source

[ePlan.tn.gov](https://ePlan.tn.gov) > FY26  
LEA Doc Library >  
Annual  
Performance Report  
(APR) Local  
Determinations



3

### Strategy

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

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

## *Point of Contact, Points and Example, and Counter*



4

### POC

[IDEA.Data.Support@tn.gov](mailto:IDEA.Data.Support@tn.gov)



5

### Points and Example

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

Point Counter (Avg):

44.4

Point Counter (Max):

200

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

## *Definition, Source, and Mitigation Strategy*



1

### Definition

Each LEA receives one of four determinations: Meets Requirements (MR), Needs Assistance (NA), Needs Intervention (NI), or Needs Substantial Intervention (NSI).



2

### Source

[ePlan.tn.gov](https://ePlan.tn.gov) > FY26  
LEA Doc Library >  
Annual Performance  
Report (APR) Local  
Determinations)



3

### Strategy

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

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

*Point of Contact, Points and Example, and Counter*



4

## POC

[IDEA.Data.Support@tn.gov](mailto:IDEA.Data.Support@tn.gov)



5

## Points and Example

Needs Assistance: **5 points**

Needs Intervention (3+ Consecutive Needs Assistance): **10 points**

Needs Intervention: **15 points**

Needs Substantial Intervention: **20 points.**

Point Counter (Avg): **50.3**

Point Counter (Max): **220**



# Annual Performance Report (APR): 3B

## *Definition, Source, and Mitigation Strategy*



1

### Definition

Missed APR targets in ELA and Math proficiency gains (Grades 4, 8, and EOC assessments).



2

### Source

[ePlan.tn.gov](https://ePlan.tn.gov) > FY26  
LEA Doc Library >  
Annual Performance  
Report (APR) Local  
Determinations)



3

### Strategy

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

# Annual Performance Report (APR): 3B

## *Point of Contact, Points and Example, and Counter*



4

### POC

[IDEA.Data.Support@tn.gov](mailto:IDEA.Data.Support@tn.gov)



5

### Points and Example

**1 point** for each missed target; maximum of **4 points**.

Point Counter (Avg):

51.8

Point Counter (Max):

224

# Annual Performance Report (APR): 5A

## *Definition, Source, and Mitigation Strategy*



1

### Definition

Measures appropriate LRE placement by examining the percentage of SWDs in the regular class 80% or more per day.



2

### Source

[ePlan.tn.gov](https://ePlan.tn.gov) > FY26  
LEA Doc Library >  
Annual Performance  
Report (APR) Local  
Determinations)



3

### Strategy

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

# Annual Performance Report (APR): 5A

## *Point of Contact, Points and Example, and Counter*



4

### POC

[IDEA.Data.Support@tn.gov](mailto:IDEA.Data.Support@tn.gov)



5

### Points and Example

At or Above the Target of 77.20%: **0 points**

70.00 to 77.19%: **1 point**

60.00 to 69.99%: **3 points**

Below 60.00%: **5 points**

Point Counter (Avg):

52.3

Point Counter (Max):

229

# Significant Disproportionality

## *Definition, Source, and Mitigation Strategy*



1

### Definition

Identification of children as children with disabilities;  
Placement in particular educational settings of such children; and  
Incidence, duration, and type of disciplinary actions, including suspensions and expulsions.



2

### Source

[ePlan.tn.gov](https://eplan.tn.gov) > FY26  
LEA Doc Library >  
Significant  
Disproportionality



3

### Strategy

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

# Significant Disproportionality

## *Point of Contact, Points and Example, and Counter*



4

### POC

[FPO divisional coordinator](mailto:FPO_divisional_coordinator@tn.gov)  
[IDEA.Data.Support@tn.gov](mailto:IDEA.Data.Support@tn.gov)



5

### Points and Example

**10 points** for each area identified, up to a maximum of **20 points**.

Point Counter (Avg):

52.8

Point Counter (Max):

239

# LEA-Level Isolation/Restraint Incidents

## *Definition, Source, and Mitigation Strategy*



1

### Definition

Duplicate entries; Missing data  
Student/staff death reported  
Isolation exceeds 60 minutes  
Restraint exceeds 5 minutes  
Incidents in non-school hours  
Parent not notified same day  
Finalized without a disability  
Finalized 5+ days after the incident



2

### Source

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



3

### Strategy

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

# LEA-Level Isolation/Restraint Incidents

*Point of Contact, Points and Example, and Counter*



4

## POC

[IDEA.Data.Support@tn.gov](mailto:IDEA.Data.Support@tn.gov)



5

## Points and Example

**0%** of incidents flagged: **0 points**

**less than 10%** of incidents flagged: **3 points**

**10% or more** of incidents flagged: **5 points.**

Point Counter (Avg):

55.2

Point Counter (Max):

244



# IDEA Complaints Findings and Due Process Final Orders

## *Definition, Source, and Mitigation Strategy*



1

### **Definition**

Special education complaints alleging noncompliance with identification, evaluation, placement, or FAPE requirements.



2

### **Source**

Office of General Counsel, Tennessee Department of Education



3

### **Strategy**

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

# IDEA Complaints Findings and Due Process Final Orders

*Point of Contact, Points and Example, and Counter*



4

## POC

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



5

## Points and Example

Due process final order results in a judgment: **25 points**.  
One administrative complaint and violation does not include a deprivation of FAPE: **10 points**.  
One administrative complaint results in a determination and includes a deprivation of FAPE: **25 points**.  
More than one administrative complaint: **25 points**.

Point Counter (Avg):

58.0

Point Counter (Max):

294

# IDEA Due Process Resolution

## *Definition, Source, and Mitigation Strategy*



1

### 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.



2

### Source

Office of General  
Counsel, Tennessee  
Department of  
Education



3

### Strategy

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

# IDEA Due Process Resolution

## *Point of Contact, Points and Example, and Counter*



4

### POC

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



5

### Points and Example

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

Point Counter (Avg):

58.0

Point Counter (Max):

304

# IDEA Director Years of Experience

## *Definition, Source, and Mitigation Strategy*



1

### Definition

Years of experience in the role within Tennessee upon submission of the Consolidated Funding Application (CFA)



2

### Source

FY27 Consolidated Funding Application



3

### Strategy

None; Everyone has a first day in a new job. It increases risk of mistakes temporarily. It's okay!

# IDEA Director Years of Experience

*Point of Contact, Points and Example, and Counter*



4

## POC

FPO Coordinator  
Geneva Taylor



5

## Points and Example

3+ years of experience = **No points**

1-3 years of experience = **2 points**

Less than 1 year of experience = **5 points**

Point Counter (Avg):

59.0

Point Counter (Max):

309

# IDEA Results-Based Monitoring Actions Steps

## *Definition, Source, and Mitigation Strategy*



1

### Definition

LEAs with IDEA  
Results-Based  
Monitoring Findings  
of Non-Compliance or  
Corrections Needed



2

### Source

FY26 Results-Based  
Monitoring Results



3

### Strategy

Review other LEA  
monitoring trends;  
conduct gap analysis  
in policies/practices;  
seek assistance from  
coordinators and  
consultants

# IDEA Results-Based Monitoring Actions Steps

## *Point of Contact, Points and Example, and Counter*



4

### POC

Geneva Taylor  
FPO Coordinator  
Fiscal Consultant



5

### Points and Example

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

Point Counter (Avg):

64.2

Point Counter (Max):

329



# IEP Monitoring Risk

## *Definition, Source, and Mitigation Strategy*



1

### 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.



2

### Source

TN PULSE > Compliance Monitoring > Monitoring Cohort (SEA Findings Column, Total Findings)



3

### Strategy

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

# IEP Monitoring Risk

## *Point of Contact, Points and Example, and Counter*



4

### POC

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

Geneva Taylor



5

### Points and Example

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**

Point Counter (Avg):

66.3

Point Counter (Max):

359

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# Perkins V

# CTE PD Attendance

## *Definition, Source, and Mitigation Strategy*



1

### **Definition**

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



2

### **Source**

FY26 Attendance  
Documentation by  
CTE/CORE



3

### **Strategy**

Attend or send a  
designee to meetings

# CTE PD Attendance

## *Point of Contact, Points and Example, and Counter*



4

### POC

Assigned CTE/CORE  
office contact



5

### Points and Example

Present at less than 75% of state meetings: **10 points**  
Present at less than 75% of regional meetings: **10 points;**  
maximum of **20 points.**

Point Counter (Avg):

67.9

Point Counter (Max):

379

# CTE Results-Based Monitoring Actions Steps

## *Definition, Source, and Mitigation Strategy*



1

### Definition

LEAs with Perkins-related Results-Based Monitoring Findings of Non-Compliance or Corrections Needed



2

### Source

FY26 Results-Based Monitoring Results



3

### Strategy

Review other LEA monitoring trends; conduct gap analysis in policies/practices; seek assistance from coordinators and consultants

# CTE Results-Based Monitoring Actions Steps

## *Point of Contact, Points and Example, and Counter*



4

### POC

Michael Gateley



5

### Points and Example

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

Point Counter (Avg):

69.4

Point Counter (Max):

399

# CTE Director Years of Experience

## *Definition, Source, and Mitigation Strategy*



1

### Definition

Years of experience in the role within Tennessee upon submission of the Perkins Basic application



2

### Source

FY27 Employment Matrix



3

### Strategy

None; Everyone has a first day in a new job. It increases risk of mistakes temporarily. It's okay!



# CTE Director Years of Experience

## *Point of Contact, Points and Example, and Counter*



4

### POC

Assigned CTE/CORE  
office contact



5

### Points and Example

3+ years of experience = **No points**

1-3 years of experience = **2 points**

Less than 1 year of experience = **5 points**

Point Counter (Avg):

70.4

Point Counter (Max):

404

# ***Updated: CTE PD Allocation***

## ***Definition, Source, and Mitigation Strategy***



1

### **Definition**

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



2

### **Source**

[ePlan.tn.gov](https://eplan.tn.gov) >  
Funding Applications  
> FY26 Perkins Basic >  
Budget



3

### **Strategy**

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

# ***Updated: CTE PD Allocation***

## *Point of Contact, Points and Example, and Counter*



**4**

### **POC**

Assigned CTE/CORE  
office contact



**5**

### **Points and Example**

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

**Point Counter (Avg):**

**70.5**

**Point Counter (Max):**

**409**

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## Fiscal

# Single Audit Findings or Single Audit Not Required

## *Definition, Source, and Mitigation Strategy*



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

### Source

Comptroller of the Treasury's Local Government Audit Reports



3

### Strategy

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

# Single Audit Findings or Single Audit Not Required

## *Point of Contact, Points and Example, and Counter*



4

### POC

Holly Kellar



5

### Points and Example

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

Point Counter (Avg):

71.3

Point Counter (Max):

424

# Annual Financial Report Findings

## *Definition, Source, and Mitigation Strategy*



1

### Definition

Financial risk based on audit findings in Annual Financial Reports; LEAs with centralized finance departments inherit related findings, and missing reports receive maximum points.



2

### Source

Comptroller of the Treasury's Local Government Audit Reports



3

### Strategy

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

# Annual Financial Report Findings

## *Point of Contact, Points and Example, and Counter*



4

### POC

Holly Kellar



5

### Points and Example

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

Point Counter (Avg):

78.7

Point Counter (Max):

474



# Centralized Finance Office

## *Definition, Source, and Mitigation Strategy*



1

### Definition

Additional financial risk for LEAs using centralized county/city finance offices due to limited fiscal control and potential mismanagement of federally funded expenditures.



2

### Source

Office of Chief  
Financial Officer List



3

### Strategy

Ensure that centralized finance offices receive access to training materials, share EDGAR and state requirements, etc.

# Centralized Finance Office

## *Point of Contact, Points and Example, and Counter*



4

### POC

Holly Kellar



5

### Points and Example

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

Point Counter (Avg):

81.1

Point Counter (Max):

484

# CFA Preliminary Award

## *Definition, Source, and Mitigation Strategy*



1

### Definition

Total grant allocation provided through the Consolidated Funding Application, including IDEA funds reserved for mandatory CCEIS, as of July 1, 2026.



2

### Source

[ePlan.tn.gov](https://eplan.tn.gov) >  
Funding Applications  
> FY27 CFA >  
Allocations



3

### Strategy

*None*

# CFA Preliminary Award

## *Point of Contact, Points and Example, and Counter*



4

### POC

Kate Smitheal



5

### Points and Example

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

Point Counter (Avg):

83.1

Point Counter (Max):

489

# ESEA Bookkeeper Years of Experience

## *Definition, Source, and Mitigation Strategy*



1

### **Definition**

Years of experience in the role within Tennessee upon submission of the Consolidated Funding Application (CFA)



2

### **Source**

FY27 Consolidated Funding Application



3

### **Strategy**

None; Everyone has a first day in a new job. It increases risk of mistakes temporarily. It's okay!

# ESEA Bookkeeper Years of Experience

## *Point of Contact, Points and Example, and Counter*



4

### POC

FPO Coordinator  
Geneva Taylor



5

### Points and Example

3+ years of experience = **No points**

1-3 years of experience = **2 points**

Less than 1 year of experience = **5 points**

Point Counter (Avg):

83.7

Point Counter (Max):

494

# ESEA Expired/Release of Funds

## *Definition, Source, and Mitigation Strategy*



1

### Definition

Reverting more than \$100 unspent or returning ESEA grant funds to the department, indicating underutilization of federal funding.



2

### Source

[ePlan.tn.gov](http://ePlan.tn.gov) >  
Reimbursement  
Requests and Source:  
ePlan.tn.gov >  
Funding Applications  
> CFA > Allocations



3

### Strategy

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

# ESEA Expired/Release of Funds

## *Point of Contact, Points and Example, and Counter*



4

### POC

Kate Smitheal



5

### Points and Example

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

Point Counter (Avg):

86.7

Point Counter (Max):

499



# ESSA Excess Carryover

## *Definition, Source, and Mitigation Strategy*



1

### 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.



2

### Source

[ePlan.tn.gov](https://eplan.tn.gov) >  
Funding Applications  
> FY25 CFA > Sections  
> Reimbursements



3

### Strategy

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

# ESSA Excess Carryover

## *Point of Contact, Points and Example, and Counter*



4

### POC

Kate Smitheal



5

### Points and Example

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

Point Counter (Avg):

92.2

Point Counter (Max):

509

# IDEA Bookkeeper Years of Experience

## *Definition, Source, and Mitigation Strategy*



1

### Definition

Years of experience in the role within Tennessee upon submission of the Consolidated Funding Application (CFA)



2

### Source

FY27 Consolidated Funding Application



3

### Strategy

None; Everyone has a first day in a new job. It increases risk of mistakes temporarily. It's okay!

# IDEA Bookkeeper Years of Experience

## *Point of Contact, Points and Example, and Counter*



4

### POC

FPO Coordinator  
Geneva Taylor



5

### Points and Example

3+ years of experience = **No points**

1-3 years of experience = **2 points**

Less than 1 year of experience = **5 points**

Point Counter (Avg):

92.9

Point Counter (Max):

514

# IDEA Expired/Release of Funds

## *Definition, Source, and Mitigation Strategy*



1

### Definition

Reverting more than \$100 unspent or returning IDEA grant funds to the department, indicating underutilization of federal funding.



2

### Source

[ePlan.tn.gov](http://ePlan.tn.gov) >  
Reimbursement  
Requests and Source:  
[ePlan.tn.gov](http://ePlan.tn.gov) >  
Funding Applications  
> CFA > Allocations



3

### Strategy

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

# IDEA Expired/Release of Funds

## *Point of Contact, Points and Example, and Counter*



4

### POC

Kate Smitheal



5

### Points and Example

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

Point Counter (Avg):

93.0

Point Counter (Max):

519

# IDEA Excess Carryover

## *Definition, Source, and Mitigation Strategy*



1

### Definition

LEAs that carry over 50% or greater from the previous fiscal year in the IDEA, Part B or IDEA, Preschool grants.



2

### Source

[ePlan.tn.gov](https://eplan.tn.gov) >  
Funding Applications  
> FY25 CFA > Sections  
> Reimbursements



3

### Strategy

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

# IDEA Excess Carryover

## *Point of Contact, Points and Example, and Counter*



4

### POC

Kate Smitheal



5

### Points and Example

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

Point Counter (Avg):

96.9

Point Counter (Max):

529



# Perkins V Basic Preliminary Allocation

## *Definition, Source, and Mitigation Strategy*



1

### Definition

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



2

### Source

[ePlan.tn.gov](https://eplan.tn.gov) >  
Funding Applications  
> FY27 Perkins Basic >  
Allocations



3

### Strategy

*None*

# Perkins V Basic Preliminary Allocation

## *Point of Contact, Points and Example, and Counter*



4

### POC

Kate Smitheal

FPO.Monitoring@tn.gov



5

### Points and Example

**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

**Point Counter (Avg):**

**99.3**

**Point Counter (Max):**

**534**

# Perkins V Basic Unexpended/Release of Funds

## *Definition, Source, and Mitigation Strategy*



1

### Definition

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.



2

### Source

[ePlan.tn.gov](http://ePlan.tn.gov) >  
Reimbursement  
Requests and Source:  
[ePlan.tn.gov](http://ePlan.tn.gov) >  
Funding Applications  
> Perkins Basic >  
Allocations



3

### Strategy

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

# Perkins V Basic Unexpended/Release of Funds

## *Point of Contact, Points and Example, and Counter*



4

### POC

Kate Smitheal



5

### Points and Example

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

Point Counter (Avg):

100

Point Counter (Max):

539

# Perkins V Drawdown

## *Definition, Source, and Mitigation Strategy*



1

### Definition

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



2

### Source

[ePlan.tn.gov](https://eplan.tn.gov) >  
Reimbursement  
Requests > FY25  
Perkins Basic



3

### Strategy

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

# Perkins V Drawdown

## *Point of Contact, Points and Example, and Counter*



4

### POC

Assigned CTE/CORE  
office contact



5

### Points and Example

LEAs with less than an average of 20% drawdown per quarter receive **15 points**. (By Oct. 31: 25% or greater; By Jan. 31, Quarter 2: 50% or greater; By April 30, Quarter 3: 65% or greater; By June 30, Quarter 4: 100% [up to a \$100 variance])

Point Counter (Avg): **111**

Point Counter (Max): **554**

# CFO/Treasurer Experience

## *Definition, Source, and Mitigation Strategy*



1

### **Definition**

Years of experience in the role within Tennessee upon submission of the Consolidated Funding Application (CFA)



2

### **Source**

FY27 Consolidated Funding Application



3

### **Strategy**

None; Everyone has a first day in a new job. It increases risk of mistakes temporarily. It's okay!

# CFO/Treasurer Experience

*Point of Contact, Points and Example, and Counter*



4

## POC

FPO Coordinator  
Fiscal Consultant  
Geneva Taylor



5

## Points and Example

3+ years of experience = **No points**  
1-3 years of experience = **2 points**  
Less than 1 year of experience = **5 points**

Point Counter (Avg):

112

Point Counter (Max):

559



# ePlan Budget Deadline

## *Definition, Source, and Mitigation Strategy*



1

### Definition

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



2

### Source

[ePlan.tn.gov](https://eplan.tn.gov) >  
Funding Applications  
> FY26 > State Funds  
Application



3

### Strategy

Calendar deadlines, check in with fiscal consultants, attend PD and office hours. Request extensions in advance for extreme circumstances.

# ePlan Budget Deadline

*Point of Contact, Points and Example, and Counter*



4

## POC

Holly Kellar



5

## Points and Example

LEAs that miss the final budget deadline receive 10 points.

Point Counter (Avg): **114**

Point Counter (Max): **569**

# Updated: CFA, Perkins Basic, and State Funds FER Deadline

## *Definition, Source, and Mitigation Strategy*



1

### Definition

LEAs must complete and fully submit the CFA (Aug. 15), Perkins Basic (Oct. 1), and State Funds (Oct. 1) Final Expenditure Reports by the deadline.



2

### Source

[ePlan.tn.gov](https://eplan.tn.gov) >  
Funding Applications  
> FY25 > (Appropriate  
Funding Application)



3

### Strategy

Calendar deadlines, check in with fiscal consultants, attend PD and office hours. Request extensions in advance for extreme circumstances.

# Updated: CFA, Perkins Basic, and State Funds FER Deadline

*Point of Contact, Points and Example, and Counter*



4

## POC

Holly Kellar



5

## Points and Example

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

Point Counter (Avg):

117

Point Counter (Max):

599

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# Cross-Cutting

# Priority and Comprehensive Support and Improvement:

## *Definition, Source, and Mitigation Strategy*



1

### Definition

Priority schools, were the bottom five percent of the schools across the state due to multiple years of low academic performance.



2

### Source

2024-25 School Designation Lists



3

### Strategy

Adjust strategies that are not providing a return on investment, connect with School Improvement team for support.

# Priority and Comprehensive Support and Improvement:

*Point of Contact, Points and Example, and Counter*



4

## POC

FPO Coordinator



5

## Points and Example

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

Point Counter (Avg):

118

Point Counter (Max):

614

# In Need of Improvement Schools:

## *Definition, Source, and Mitigation Strategy*



1

### Definition

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



2

### Source

2024-25 School Designation Lists



3

### Strategy

Adjust strategies that are not providing a return on investment, connect with School Improvement team for support.



# In Need of Improvement Schools:

## *Point of Contact, Points and Example, and Counter*



4

### POC

FPO Coordinator



5

### Points and Example

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**.

Point Counter (Avg):

127

Point Counter (Max):

629

# ESEA/IDEA/CTE/DOS Director Same Person:

## *Definition, Source, and Mitigation Strategy*



1

### Definition

Same person assigned two or more of the following programs or roles: ESSA, IDEA, CTE, fiscal director, and/or Director of Schools



2

### Source

FY27 Address Book and/or Consolidated Funding Application (CFA).



3

### Strategy

Attend PD, keep documentation; consider reviewing full-time equivalents (FTEs) for adjustment discussions regularly.

# ESEA/IDEA/CTE/DOS Director Same Person:

## *Point of Contact, Points and Example, and Counter*



4

### POC

FPO Coordinator  
Fiscal Consultant  
FPO Monitoring



5

### Points and Example

**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.

Point Counter (Avg):

127

Point Counter (Max):

639

# TN OCR Findings:

## *Definition, Source, and Mitigation Strategy*



1

### Definition

If 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.



2

### Source

FY26 OCR Violations List, Office of General Counsel



3

### Strategy

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

# TN OCR Findings:

## *Point of Contact, Points and Example, and Counter*



4

### POC

Shaundraya Hersey



5

### Points and Example

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

Point Counter (Avg):

128

Point Counter (Max):

649

# Director of Schools' Years of Experience:

## *Definition, Source, and Mitigation Strategy*



1

### Definition

Years of experience in the role within Tennessee upon submission of the Consolidated Funding Application (CFA)



2

### Source

FY27 Consolidated Funding Application



3

### Strategy

None; Everyone has a first day in a new job. It increases risk of mistakes temporarily. It's okay!

# Director of Schools' Years of Experience:

## *Point of Contact, Points and Example, and Counter*



4

### POC

FPO Coordinator  
Fiscal Consultant  
Geneva Taylor



5

### Points and Example

3+ years of experience = **No points**  
1-3 years of experience = **2 points**  
Less than 1 year of experience = **5 points**

Point Counter (Avg):

129

Point Counter (Max):

654

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# Years Since Last Monitored



# Years Since Last Monitored Topic:

## *Definition, Source, and Mitigation Strategy*



1

### Definition

LEAs are monitored via one of three results-based monitoring levels.



2

### Source

Through FY26 Results-Based Monitoring records



3

### Strategy

Review current requirements and updates to federal and state laws; ensure updates are incorporated into LEA practices

# Years Since Last Monitored Topic:

## *Point of Contact, Points and Example, and Counter*



4

### POC

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



5

### Points and Example

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

Point Counter (Avg):

179

Point Counter (Max):

794

# Perkins V Years Since Monitored:

## *Point of Contact, Points and Example, and Counter*



4

### POC

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



5

### Points and Example

**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.*

Point Counter (Avg):

196

Point Counter (Max):

824

# Fiscal Years Since Monitored:

*Point of Contact, Points and Example, and Counter*



4

**POC**

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



5

**Points and Example**

**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.*

**Point Counter (Avg):**

**226**

**Point Counter (Max):**

**889**

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# Business Rules

# 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.
- 
- 
-

# Business Rules

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.
- 
- 
-

# Business Rules

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.
- 
- 
-



# Business Rules

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.
- 
- 
-

# Business Rules

- 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.
- 
- 
-

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# Most Common Questions

# Question 1

*Q: Can you reduce my score if....?*

## Question 2

*Q: We hired a new person on X date...*

---

---

---

## Question 3

*Q: I accidentally reported someone in multiple roles...*

---

---

---

# Question 4

*Q: Spill the tea. Who did worse than us?*

## Question 5

*Q: Am I in trouble? Did I do something wrong? Am I getting fired for this?*

---

---

---



# Question 6

*Q: Why me????????????????*

## Question 7

*Q: Something is wrong with my score.  
What do I do?*

# Question 7

*Q: So, I'm new...*

*I'm anxious...*

*I need more time!!!*

*Can this please just wait?*

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# Conclusion and Contacts

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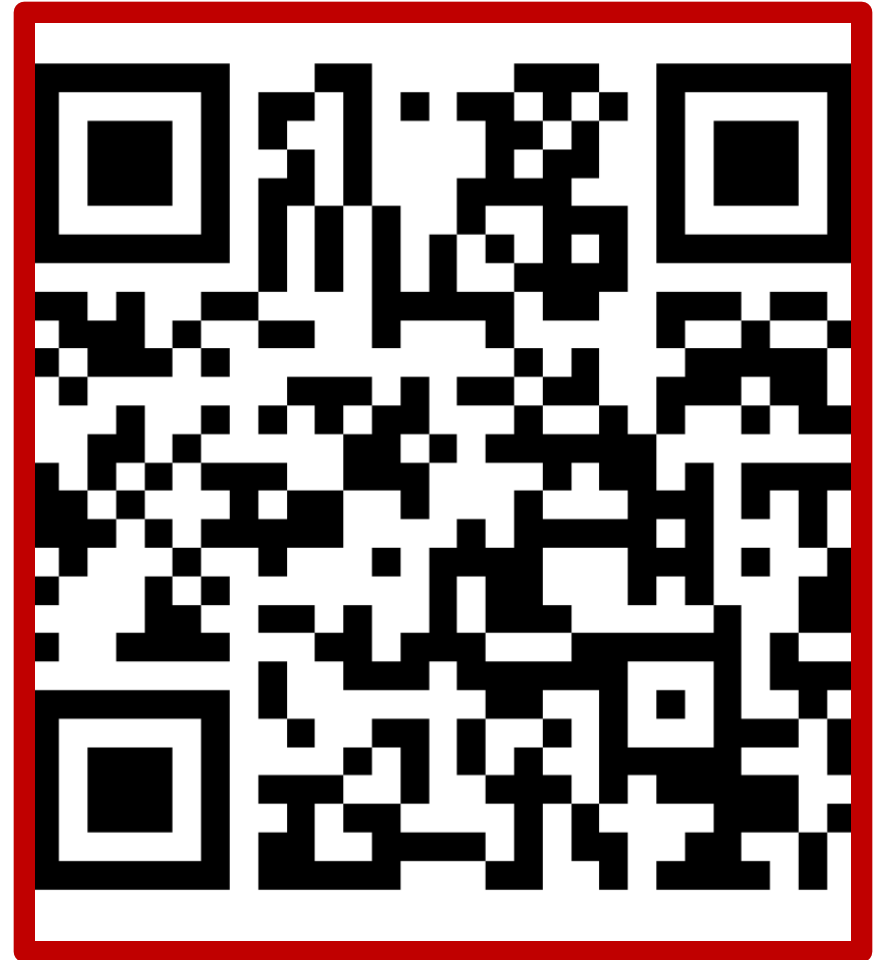
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# Fraud, Waste or Abuse

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](mailto:Geneva.Taylor@tn.gov); (615) 580-2039

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