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2026 Federal Programs Institute

Reaching New Heights: Preparing for Results-Based Monitoring Success

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Federal Programs and Oversight

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While the State supports your desire to maintain documentation of the meeting and what you learn, **please respect our decision to safeguard information** and do not attempt to use tools such as these. If you choose to use a tool such as this, the State will block that tool from the meeting.





Agenda

- Logistics of Monitoring
 - Level 3
 - Level 2
 - Level 1
- Trends, Issues, and Solutions
 - ESSA
 - IDEA
 - CTE
 - Fiscal
 - Other
- Common Questions



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Logistics of Monitoring

Michael Gateley

Results Based Monitoring (RBM):

Levels II and III Comparison: 1 of 3

RBM Level III	RBM Level II
The department identifies 12% of LEAs for significant review via the risk analysis process (~18 LEAs).	The department identifies approximately 12% of LEAs for elevated review via the risk analysis process (~18 LEAs).
Introduction meeting held virtually one to two days before the first scheduled day of the in-person visit	Intro and Cross-Cutting conversation held the same day as virtual LEA conversations
Federal Programs and Oversight (FPO) and Fiscal Monitoring Team will conduct onsite visits to LEAs and applicable school staff.	FPO and Fiscal monitoring teams hold virtual conversations with LEAs (no school staff).

Results Based Monitoring (RBM):

Levels II and III Comparison: 2 of 3

RBM Level III	RBM Level II
LEA and School level pages to be completed.	No School-Level Reviews = No School-Level Pages.
Pre-Visit Teams meeting LEA-level: LEA introductions, review agenda and school visit plans, review missing documentation, discuss cross-cutting items.	Pre-Visit Teams meeting LEA-level: LEA introductions, review agenda, review missing documentation, discuss cross-cutting items.
Monitoring results shared via a scheduled Teams meeting (virtually)	Monitoring results shared via a scheduled Teams meeting (virtually)

Results Based Monitoring (RBM):

Levels II and III Comparison: 3 of 3

RBM Level III	RBM Level II
Scheduling occurs through the FPO.Monitoring@tn.gov account with individual invites for each event/discussion. • Ensure LEA Address Book details are accurate in ePlan for all roles involved in the monitoring process.	Scheduling occurs through the FPO.Monitoring@tn.gov account with individual invites for each event/discussion.
In-person visits will take place over 1-5 days to allow for travel between schools within the LEA.	3 virtual calls total during two separate days.
First visits and virtual discussions begin in early to mid-October.	Level II conversations begin in early February to mid April.

Logistics of Monitoring:

Access to ePlan (1 of 2)

- Users with appropriate access may log in to ePlan, then choose Monitoring > Monitoring Instruments > 2027 > “3. Level 3 Results-Based Monitoring” or “2. Level 2 Results-Based Monitoring”.
- Click **Draft Started** at the top of the Sections (*main*) page to begin pre-work.
- For LEA access, complete and return the [ePlan LEA User Access Form](#).
 - Email completed forms to ePlan.Help@tn.gov.
- Instruments will open ~6 weeks prior to the scheduled monitoring/virtual conversation dates.

Logistics of Monitoring:

Access to ePlan (2 of 2)

- Most pages within the instrument require uploaded evidence.
- LEAs must upload at least the minimum number of documents identified next to each document name.
- If there is more than one upload, continue to add items until the proper evidence has been provided.
- **Do not upload Personally Identifiable Information (PII).**
 - *ID numbers are encouraged instead of PII.*
 - *OMB Memorandum M-07-1616 refers to information used to distinguish an individual's identity, either alone or when combined with other personal or identifying information that is linkable to a specific individual. Although ePlan is a secure platform, LEAs must protect PII, and the department reviews uploads to determine compliance in the Monitoring Instrument in ePlan.*

Logistics of Monitoring: Practices

- Most pages within the Level 2 and 3 monitoring instruments require responses to short questions or statements.
- Where applicable, use the drop-down boxes to choose from the provided list(s).
- Most pages in the instrument require users to choose between *Agree* and *Disagree*.
 - If the LEA or school chooses **Disagree**, the user must provide a justification.
 - **This requirement does not necessarily identify that the item is out of compliance.*
- Some items have an option to choose Not Applicable or N/A. If the user chooses **Agree**, **Yes**, or **N/A**, there is no need to justify the response.

Logistics of Monitoring: Narratives

- Several pages within the Level 2 and 3 instruments require responses to questions in an *open response* text box.
- Read each question or statement thoroughly and respond with enough information to address **all elements** of the question or statement.
 - *Note: Users do not need to reiterate items already uploaded and may instead refer monitors to specific pages of a policy to review if the answer is contained in an upload.*
- If additional information is needed, please upload a companion document in the most appropriate area on the Related Documents page and communicate the name of the upload in the response area.

Logistics of Monitoring: Divide and Conquer

- Divide responsibilities with colleagues.
- Decide who at each school is the point person for school-level pages (Level 3 only).
- Discuss responsibilities and timeline with colleagues:
 - First, gather the required uploads.
 - Then, answer Agree/Disagree questions.
 - Explain Disagree answers succinctly.
 - Lastly, answer open-response questions.
 - Refer to uploads when convenient/necessary.
- **Tip: Do not use placeholder documents or placeholder language in answers.**

Logistics of Monitoring:

Ask for Help

- Each district will be scheduled for a pre-monitoring meeting via Microsoft Teams approximately four weeks before the monitoring dates.
 - Please ask clarifying questions before, during, and after the pre-monitoring meeting.
- Ask for a technical assistance (TA) meeting for support if needed.
 - We are here to help you!

Logistics of Monitoring:

Pre-Work: Department Obligations

- The monitoring team:
 - Notifies LEAs of their monitoring type, date(s), selected school(s), and scheduled exit date;
 - Marks specific sections as not applicable based on the student population of each LEA;
 - Conducts a conference call with LEA leaders to discuss the visit, expectations, and agenda, and to answer any questions; and
 - Reviews information in ePlan, education information system (EIS), state report card, annual performance report (APR), etc.

Logistics of Monitoring:

Pre-Work: District Obligations

- The district:
 - Reviews the monitoring instrument
 - Participates in a pre-visit virtual conference call via
 - Schedules meetings with LEA-level and school personnel to prepare for the meeting
 - Contacts FPO/fiscal divisional coordinators/project coordinators for assistance
 - Uploads required evidence and respond to pre-visit questions
 - Submits pre-work to the department for review prior to the visit/conversation
 - Confirms the agenda and needs of the monitoring team
 - Collects information not uploaded or explain why items were not available.

Logistics of Monitoring:

Pre-Work: Department Obligations Part 2

- The monitoring team:
 - Reviews submitted pre-visit responses,
 - Reviews submitted required evidence,
 - Makes notes on compliant and questionable information, and
 - Prepares on-site questions to facilitate conversation.

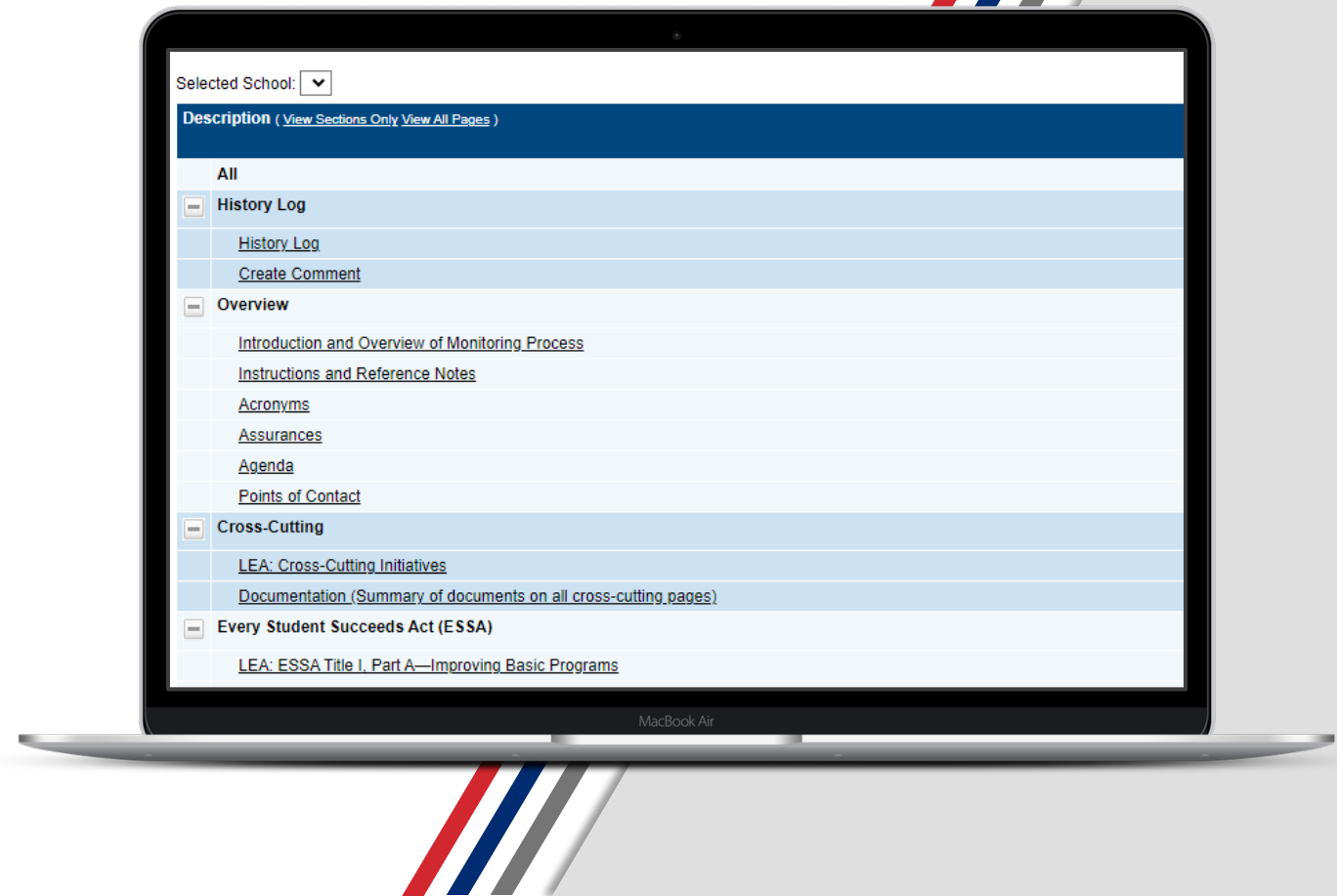
Logistics of Monitoring: Documentation Check

- Meeting Documentation
 - Agendas with dates and titles
 - Presentation Materials
 - Proof of Attendance (Sign-In Sheet)
 - Legible name and role of the attendee
- Written Policies and Procedures
- Completed Forms, Surveys, and Assessments
- Registration Documentation
 - No barriers to enrollment are present for any subgroups
- Please review the required/optional documents requested for each applicable page.

Logistics of Monitoring:

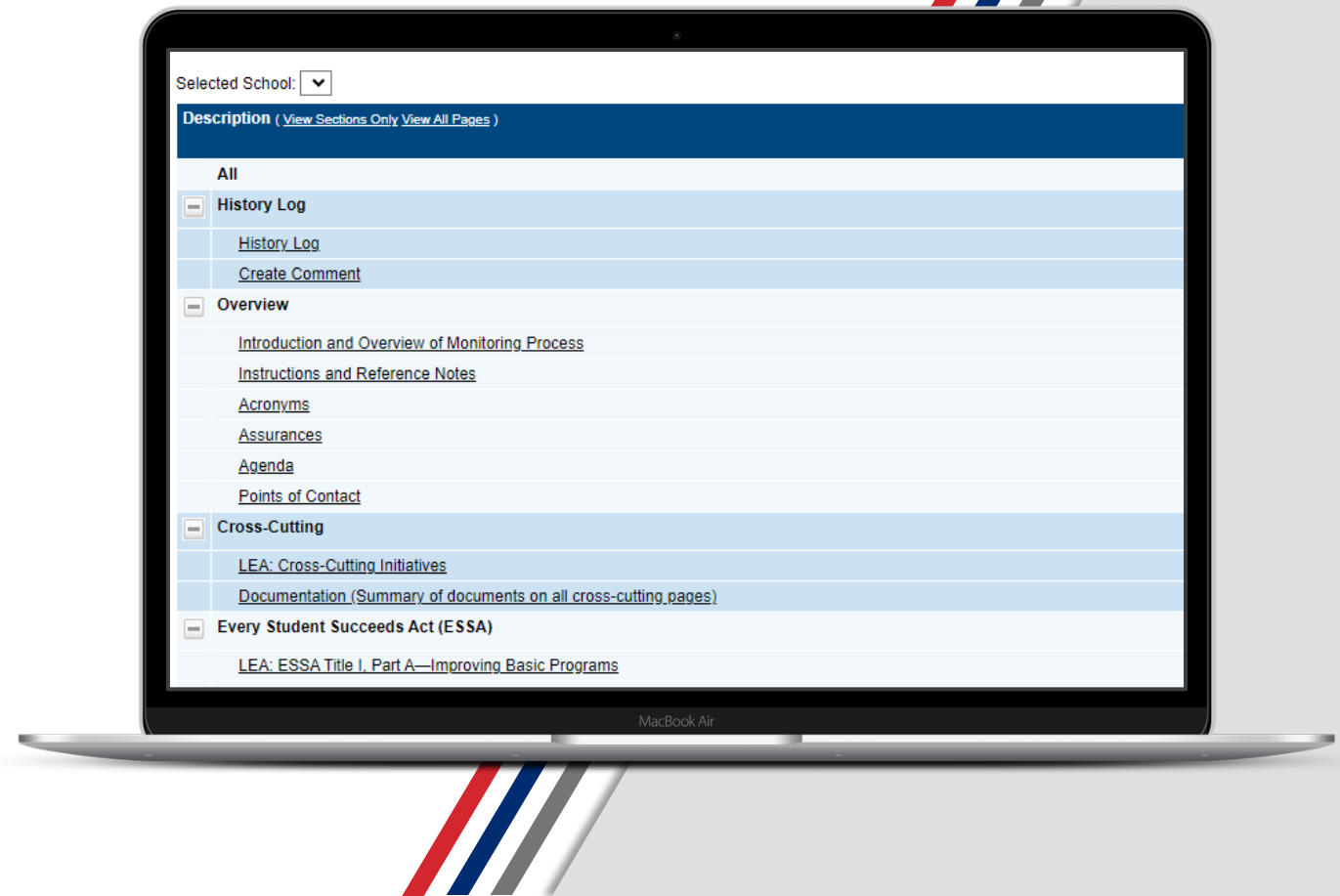
Default View of Monitoring Instrument

- The default view of the monitoring instrument has no school selected.
- Notice the dropdown box above the dark blue Description bar.



Logistics of Monitoring: Page Names

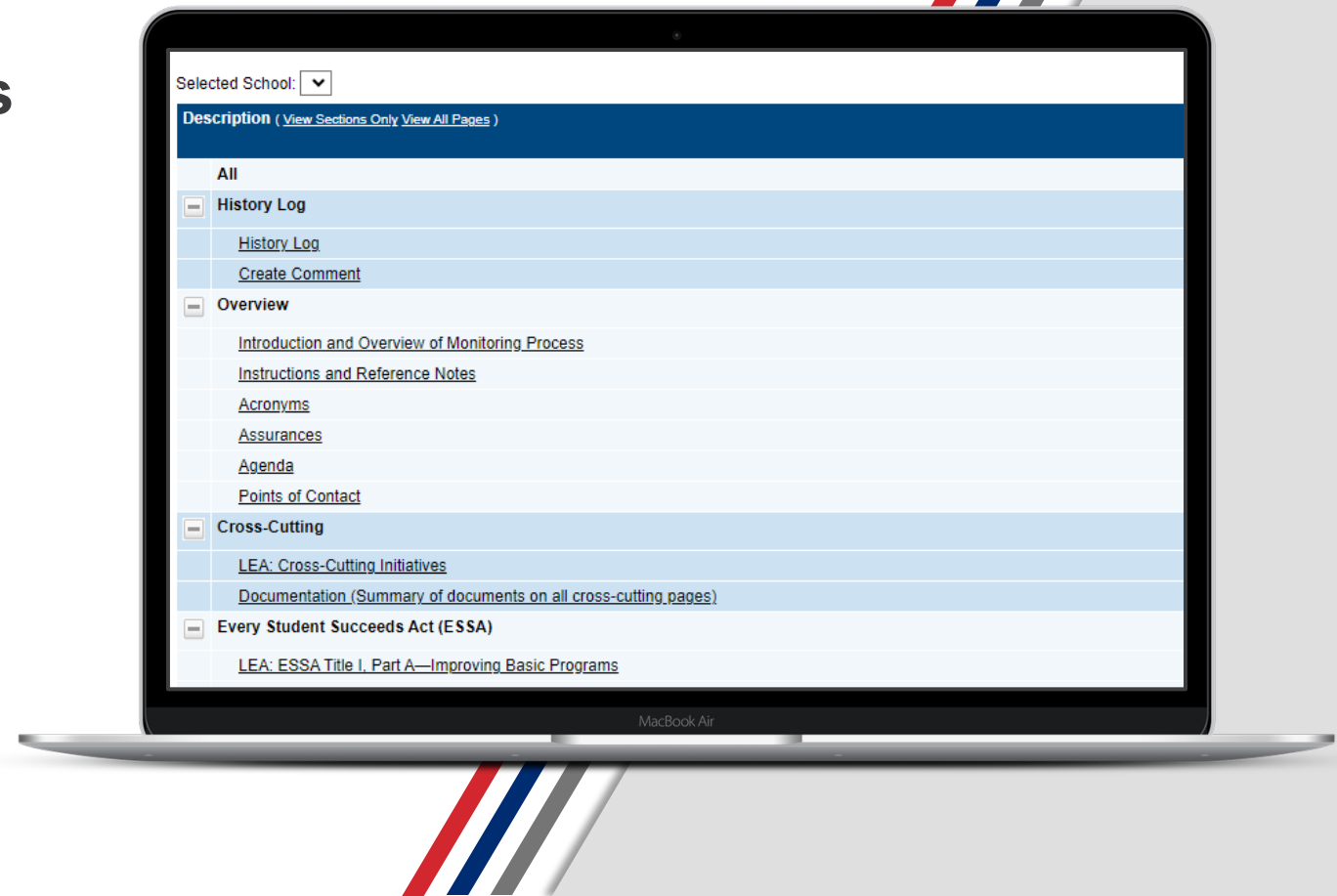
- Pages that require LEA response begin with **LEA**.
- Pages that require site-level information begin with **School** or **Facility** (if applicable).
- Pages that are only viewable to the department begin with **TDOE**.



Logistics of Monitoring:

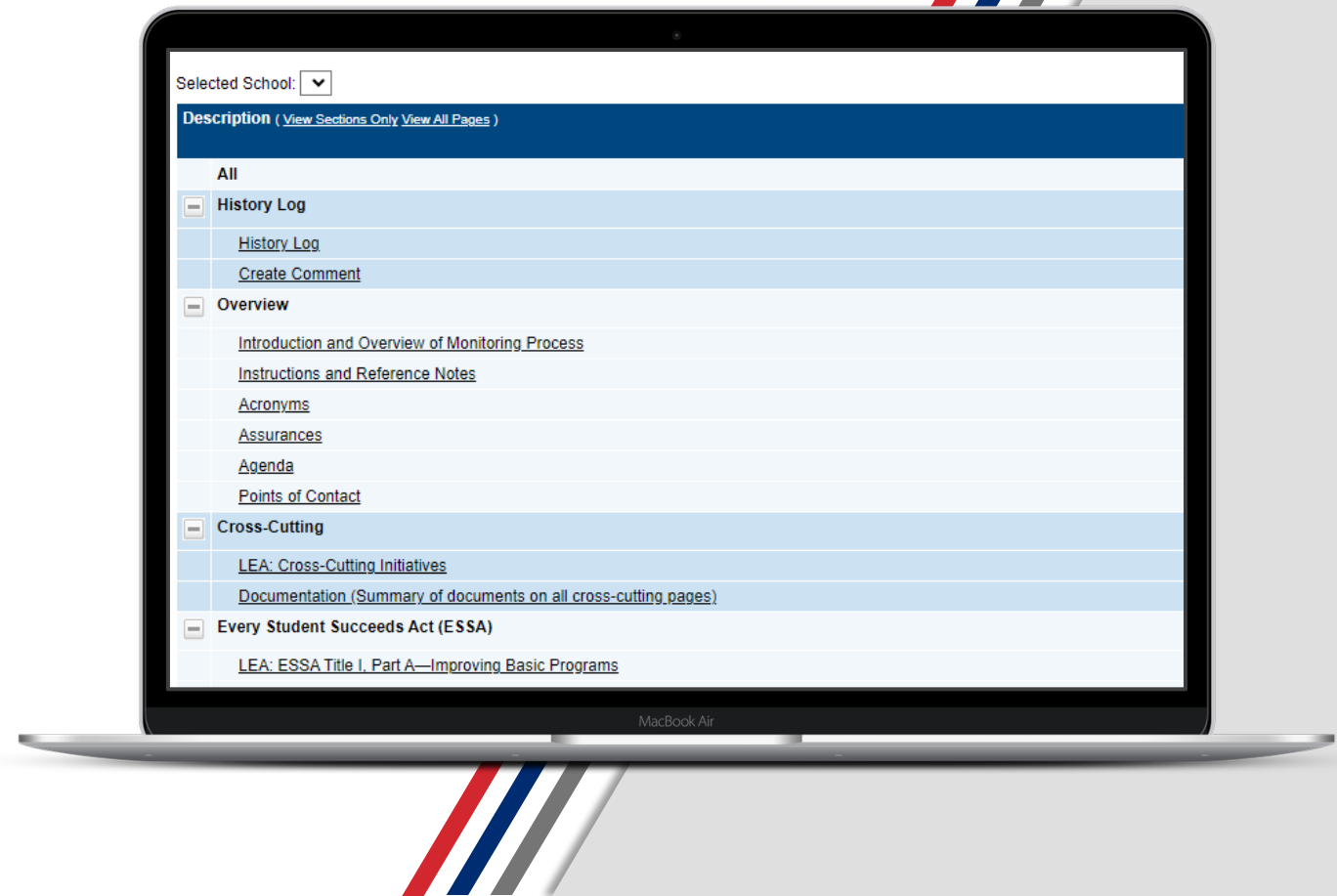
Level 3 Only: Choosing Sites

- **LEA Users** have access to adjust all pages, as do school users with appropriate access.
- Plan with your **selected schools** to determine which pages they are responsible for completing.



Logistics of Monitoring: Choosing Sites

- Ensure the correct school is chosen from the **dropdown**.
- Only complete pages that begin with **School**.
- **Caution!** LEA-level pages still appear below the Site Level section.



Logistics of Monitoring:

All Levels: Page Layout

- **Documentation**
 - Required and Optional
- **Practices**
 - Agree, Disagree, N/A
 - Disagree answers require a short explanation.
 - Choose what is accurate so the department can meet you where you are.
- **Narratives**
 - Answer the question, but do not provide more than what is asked.

Logistics of Monitoring:

All Levels: LEA Level Sections

- Cross-Cutting
 - Every Student Succeeds Act (ESSA)
 - Individuals with Disabilities Act (IDEA)
 - Strengthening Career and Technical Education for the 21st Century Act (Perkins V)
 - Relief Funding
 - Fiscal Oversight
-
-
-

Logistics of Monitoring:

Reminders for Submitting to the Instrument

- Upload **current** items for **Fiscal** pages (FY27, 2026-27).
- Upload **last school year** (if correct) for **Program** pages (FY26, 2025-26 School Year).
 - Upload the **current year** if it is the most recent compliant documentation for **Program** pages. Get credit for your compliance!
- **Reach out for support.**

Logistics of Monitoring:

Submit the Instrument

- Use the Validation column of the Sections (main) page to confirm completion.
- Confirm each uploaded document is accurate and complete.
- Once LEA and school users have completed requirements, the **LEA IDEA Director, ESSA Director, CTE Director, and Finance Director** (in this order) must return to the Sections page to change the status to **Reviewed**.
- The director of schools (**LEA Authorized Representative**) must return to the Sections page to change the status to **LEA Authorized Representative Approved** to submit the pre-visit work to the department.
- Additional instructions, including reminders that **pre-work is due 10 business days prior to the first day of the scheduled (virtual) visit**, are provided in the ePlan Monitoring Instrument. Please navigate from the Sections page to Instructions and Reference Notes for complete details.

Logistics of Monitoring: During the Visit (In-Person or Virtual)

- FPO team members:
 - visit selected schools (Level 3),
 - Interview leadership team, and, where needed, specialized staff (ESL teacher; lead special education teacher).
 - Review delivery of services and implementation of IEPs.
 - Review documentation.
 - end by interviewing District-level program directors, and
 - meet with District-level leaders to debrief and ask any additional follow-up questions (Level 2 & 3).

Logistics of Monitoring:

School-Level Reminders

- For Level 3 school visits, the monitoring team must meet concurrently (in separate spaces) with:
 - Person(s) most knowledgeable about:
 - ESSA programs
 - IDEA programs
 - CTE programs
 - inventory (separate visit)
 - We **do not** need to speak with every teacher.
 - Lead team members **do not** have to be in every interview.
 - District-level members are requested **not to attend school visits.**

Logistics of Monitoring: Post Visit and Follow-Up (Levels 2 & 3)

- The monitoring team:
 - finalizes the monitoring results,
 - formally exits with District-level leaders during a Microsoft Teams (virtual) meeting (date shared in the notification email),
 - shares the results via ePlan, and
 - changes the status to closed when all obligations are met.
- The district-level leadership team:
 - asks questions about monitoring results, action steps, and deadlines;
 - acknowledges that the results were reviewed with them via ePlan;
 - begins responding to results requiring action via ePlan; and
 - proactively reaches out to the monitoring team with questions while working on results.
- The assigned FPO divisional coordinators and regional fiscal consultants follow up on findings of non-compliance and provide support.

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Trends, Issues, and Solutions: ESSA

Geneva Taylor

Barriers to Enrollment: The Trend(s)...

- Enrollment barriers related to the McKinney-Vento Act (homeless students' immediate enrollment rights), and compliance with Plyler vs. Doe (USED and DOJ) legal requirements.
 - The McKinney-Vento Act (42 U.S.C. § 11431) **requires schools to enroll students experiencing homelessness immediately**, even if the student is unable to provide documentation typically required for enrollment.
 - Consistent with Plyler v. Doe and subsequent U.S. Department of Education and Department of Justice guidance, LEAs **may not prevent or discourage a child from enrolling** in or attending school because the child lacks documentation that is not legally required for enrollment.



Barriers to Enrollment: The Issue(s)...

- Requiring a birth certificate for enrollment
- Requiring a Social Security number
- Requiring proof of residency
- Missing language stating that students experiencing homelessness must be enrolled immediately, even without typical documentation.
- Missing immunization exceptions.



Barriers to Enrollment: The Solution(s)

- Review all enrollment forms and registration webpages.
 - Remove barriers to enrollment.
 - List alternate documents for proof of birth.
 - Passport, Visa, I-95, hospital/physician records, parent affidavit
 - Update school-level and district-level registration information.
 - Audit student handbooks, checklists, and enrollment packets.
- State clearly that students experiencing homelessness must be enrolled immediately, even when required documents are unavailable.
 - Add homelessness exceptions to enrollment requirements.



Parent and Family Engagement Policies/Plans: The Trend(s)...

- Parent and Family Engagement Policies/Plans were not jointly developed and annually reviewed with parents and families as required by ESSA §1116, or there was insufficient documentation to prove stakeholder involvement.



Parent and Family Engagement Policies/Plans: The Issue(s)...

- Lack of parent and family participation in developing or revising policies/plans.
- No documented annual review of Parent and Family Engagement Policies/Plans.
- School-Parent Compacts not being jointly developed with families.
- Lack of documentation of stakeholder involvement (invitations, agendas, sign-in sheets, meeting notes, feedback forms).
- Lack of evidence that parent feedback was incorporated into revisions.



Parent and Family Engagement Policies/Plans: The Solution(s)

- Conduct and document stakeholder meetings with parents and families to **review, revise, and jointly develop** Parent and Family Engagement Policies/Plans and School-Parent Compacts, while **maintaining evidence** such as invitations, agendas, sign-in sheets, meeting minutes, and revised documents showing parent input.



Annual Title I Meetings: The Trend(s)...

- Annual Title I Meetings were missing required components.



Annual Title I Meetings: The Issue(s)...

- Many schools failed to include all required ESSA components in Annual Title I meetings, especially:
 - Parent Rights
 - Parent Roles and Responsibilities
 - Family Engagement Requirements
 - School Curriculum Information
 - Title I Set-Asides



Annual Title I Meetings: The Solution(s)

- Document collaboration and compliance in a way that demonstrates adherence to ESSA §1116 requirements.
- In many cases, schools already:
 - Conduct meetings
 - Share information
 - Gather feedback
- Schools likely need to improve on documenting:
 - Who participated
 - What was discussed
 - How feedback influenced revisions
 - When annual reviews occurred



Title I, Part A - Students in Foster Care: The Trend(s)...

- Districts could not demonstrate compliant foster care procedures and staff training to ensure educational stability for students in foster care under ESEA requirements.



Title I, Part A - Students in Foster Care: The Issue(s)...

- Districts frequently could not demonstrate:
 - Written foster care procedures.
 - Clear processes for conducting and documenting Best Interest Determination (BID) meetings.
 - Procedures for transferring records.
 - Coordination with child welfare agency points of contact.
 - Transportation procedures for students in foster care.
 - Immediate enrollment procedures.
 - Staff training on foster care requirements.
 - Evidence that school administrators and front office staff understood foster care procedures.



Title I, Part A - Students in Foster Care: The Solution(s)

- Develop comprehensive written foster care procedures and provide training to applicable staff.
- The procedures must include:
 - Best Interest Determination (BID) meeting processes and documentation.
 - Immediate enrollment procedures.
 - Records transfer procedures.
 - Transportation procedures.
 - Roles and responsibilities of district and child welfare points of contact.
 - Communication and coordination protocols with child welfare agencies.
 - Documentation requirements for all foster care activities.



Migratory Students: The Trend(s)...

- Districts could not demonstrate a consistent, compliant process for identifying migratory students through the Occupational Survey (OS) and migrant identification procedures required under Title I, Part C.



Migratory Students: The Issue(s)...

- Districts frequently could not demonstrate:
 - Use of the current TN-approved Occupational Survey.
 - Annual administration of the Occupational Survey to all students.
 - Proper retention and filing of Occupational Surveys in student records.
 - Written migrant identification procedures that clearly lists the vendor as the decision maker.
 - Clear procedures for documenting and maintaining Occupational Surveys.
 - Accurate distinction between Migrant Education and other programs (e.g., English Learners).
 - Procedures that included use of TN Migrant systems, contractors, and databases.
 - Staff training on migrant identification procedures.
 - Evidence that Occupational Surveys were completed, maintained, and accessible.



Migratory Students: The Solution(s)

- Develop and implement comprehensive written migrant identification procedures and train all applicable staff.
- The procedures must include:
 - Use of the current TN-approved Occupational Survey.
 - Annual administration of the Occupational Survey to all students.
 - Occupational Survey collection, retention, and documentation processes.
 - Filing requirements for cumulative records.
 - Procedures for identifying and referring potentially eligible migratory students.
 - Roles of migrant contractors and use of TN Migrant database.
 - Quality control measures to ensure consistent implementation.
- Additionally:
 - Train school administrators, front office staff, registrars, counselors, and other applicable personnel on the approved procedures.
 - Maintain evidence of training, including agendas, sign-in sheets, and training materials.



English Learners: The Trend(s)...

- Individual Learning Plans (ILPs) missing required components and did not fully comply with TN SBE Rule 0520-01-19, particularly for transitional, indirect-service, and long-term EL students.



English Learners: The Issue(s)...

- Districts frequently could not demonstrate:
 - Short-term language proficiency goals in reading, writing, speaking, and listening.
 - Growth trajectories based on student data.
 - Required assessment and screener data.
 - Appropriate goals for transitional and indirect-service EL students.
 - Career-readiness goals when required.
 - Complete documentation of services, accommodations, and supports.
 - ILP development in collaboration with ESL and content teachers.
 - Consistent monitoring and review of ILPs.



English Learners: The Solution(s)

- Conduct a comprehensive audit of all EL ILPs and revise them to ensure compliance with TN SBE Rule 0520-01-19.
- The review must ensure:
 - Required assessment and achievement data are included.
 - Short-term goals are present for all four language domains.
 - Growth trajectories are documented.
 - Service plans match student EL status.
 - Appropriate accommodations and supports are outlined.
 - Career-readiness goals are included when applicable.
 - ESL and content teachers collaborate in ILP development and implementation.
 - All transitional, indirect-service, and long-term ILPs contain required components.
- Additionally:
 - Update ILP procedures and oversight plans.
 - Train applicable staff on ILP requirements and implementation.



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Trends, Issues, and Solutions: IDEA

Geneva Taylor

Provision of Special Education and Related Services: The Trend(s)...

- Absence of comprehensive, up-to-date written procedures for implementing special education and related services.
- Misaligned with TN SBE Rule 0520-01-09-.09(1)(g).
- Outdated guidance, missing required processes, or lacked documentation demonstrating implementation.
- Key areas frequently needing revision included:
 - Child Find
 - Evaluations and Reevaluations
 - IEP Development and Implementation
 - Maintenance of Effort (MOE)
 - Private School Services
 - Transition Services
 - Confidentiality Procedures



Provision of Special Education and Related Services: The Issue(s)...

- Evaluation and IEP procedures lacked the requirement to provide draft evaluation results and draft IEP documents at least 48 hours before meetings.
- Child Find procedures missing:
 - Parent involvement in referral decisions
 - RTI processes
 - Referral procedures across grade levels
 - Procedures for gifted and transfer students
- IEP procedures missing:
 - Required timelines
 - Team member responsibilities
 - Annual review requirements
 - Progress monitoring expectations
 - District oversight processes



Provision of Special Education and Related Services: The Issue(s)...

- Private school services procedures missing
- Confidentiality procedures insufficient
- MOE procedures
 - lacked guidance on completion of the SSEER
 - lacked collaboration between IDEA program and fiscal staff
- Lack of staff training for implementing accommodations, modifications, and supports
- Limited understanding of specific requirements, including ESY decision-making



Provision of Special Education and Related Services: The Solution(s)

- Standardize & Strengthen Special Education Procedures
 - Update and align special education procedures with state requirements and federal regulations
 - Establish district oversight and accountability measures
 - Ensure timely parent communication and required documentation
 - Train all relevant staff on approved procedures to ensure compliance with applicable state and federal regulations



Oversight of Special Education Service Providers: The Trend(s)...

- Frequent lack of effective oversight systems to ensure IEP services were delivered as required.
- Staffing, licensure, endorsement, and supervision concerns.
 - Service implementation was often affected by provider shortages, vacancies, or improperly credentialed personnel.



Oversight of Special Education Service Providers: The Issue(s)...

- Students did not consistently receive required IEP services.
- Special education teachers and related service providers lacked required endorsements, certifications, or licensure.
 - Contracted and district-employed providers were not consistently monitored for compliance.
 - Students were served by staff working outside their approved credential areas.
- Vacant positions left students without required services.
 - Speech-language services were not provided due to staffing shortages.
- Required supervision of support personnel (e.g., PTAs, SLPAs) was not adequately documented or implemented.
- Districts lacked systems to verify that all providers were appropriately qualified before delivering services.



Oversight of Special Education Service Providers: The Solution(s)

- Strengthen Provider Qualifications, Oversight & Service Delivery
 - Verify all special education and related service providers hold required credentials.
 - Conduct a comprehensive review of provider assignments to ensure students are served by appropriately qualified personnel.
 - Identify students affected by missed or improperly delivered IEP services and convene IEP teams to determine compensatory services when needed.
 - Complete and document all agreed-upon compensatory services and maintain required assurances.
 - Implement ongoing monitoring of staffing, credentials, and service delivery to ensure IEP services are provided as written.



Ensuring FAPE: The Trend(s)...

- Lack of Procedures and Practices to Ensure FAPE Through Successful Student Transitions and Service Implementation
 - Lacked formal procedures for required special education processes.
 - Students with disabilities were not consistently receiving services as outlined in their IEPs.
 - Shortened School Days
 - IEPs Not Followed
 - Lack of full access to instruction, services, and postsecondary transition supports.



Ensuring FAPE: The Issue(s)...

- Students with disabilities were dismissed early, reducing access to the full instructional day.
- IEP services and schedules were not consistently implemented as written.
- Students not consistently receiving the special education supports required by their IEPs.
- Required written procedures for Summary of Performance (SOP) were missing or insufficient.
 - SOP processes lacked clear guidance for student, parent, and stakeholder involvement.



Ensuring FAPE: The Solution(s)

- Strengthen internal review to ensure IEP schedules, services, and transportation arrangements are implemented as written.
 - Provide a full instructional day for all students with disabilities unless determined by the IEP team.
 - Review students who do not receive a full school day, and convene IEP teams to determine whether compensatory services are needed.
 - Complete and document all required compensatory services when FAPE was not provided.
- Train administrators, special education staff, and other relevant personnel on approved procedures and implementation expectations.



Discipline Procedures: The Trend(s)...

- Inconsistently following required disciplinary procedures for students with disabilities.
- Not consistently applying IDEA discipline protections when students were removed from instruction.
- Issues with disciplinary removals, changes of placement, manifestation determinations, and continuation of services.



Discipline Procedures: The Issue(s)...

- In-school suspensions were not consistently reviewed to determine whether they constituted a disciplinary removal.
- Changes in placement were not always properly identified or documented.
- Manifestation Determination Reviews (MDRs) were not consistently conducted when required.
- LEAs lacked processes for tracking cumulative days of removal.
 - Required educational services were not consistently provided after the 10th cumulative day of removal.
- Staff demonstrated limited understanding of discipline protections for students with disabilities.



Discipline Procedures: The Solution(s)

- Revise written discipline procedures to align with federal and state requirements to include:
 - Tracking cumulative days of removal
 - In-School Suspension (ISS) decisions
 - Manifestation Determination Reviews (MDRs)
 - Functional Behavioral Assessments (FBAs)
 - Behavior Intervention Plans (BIPs)
 - Continued provision of services after the 10th day of removal
- Monitor discipline practices and service delivery to ensure students receive FAPE during disciplinary removals.
 - Review students impacted by disciplinary removals and offer/provide compensatory services when FAPE was not provided.
- Train administrators, special education staff, and other relevant personnel on approved discipline procedures.



SWD Adults Detained in Jails: The Trend(s)...

- Lack of adequate written procedures for serving incarcerated adult students (18-21) in local jails **and for students being held as an adult who are under the age of 18.**



SWD Adults Detained in Jails: The Issue(s)...

- Insufficient or missing written procedures
- Procedures not aligned with TN SBE Rule 0520-01-09-.05
- Failure to describe how special education services will be delivered
- Missing timelines
- Missing Child Find requirements
- Failure to ensure FAPE



SWD Adults Detained in Jails: The Solution(s)

- Create or revise written procedures that specifically address:
 - Adult students with disabilities incarcerated in local jails (ages 18-21) **and for students being held as an adult who are under the age of 18.**
 - Provision of FAPE
 - Child Find responsibilities
 - Referral, evaluation, eligibility, IEP implementation, and reevaluation processes
 - Timelines for service delivery
 - District oversight and monitoring responsibilities
 - Roles and responsibilities of District staff and jail personnel
 - How services are delivered
 - Separate adult jail procedures from JDC procedures (not the same thing)



Alternative Education Oversight: The Trend(s)...

- Districts lacked written procedures for transitioning students to and from alternative schools/programs.
- Formal Transition Plans were missing, incomplete, or not aligned with:
 - T.C.A. §49-6-3402(h)(1)
 - TN SBE Rule 0520-01-02-.09(10)(m)
 - TN SBE Policy 2.302
- Procedures often failed to address:
 - Student entry and exit processes
 - Communication between schools
 - Service delivery during placement
 - Students with disabilities (SWDs)
 - Reentry to the traditional school setting



Alternative Education Oversight: The Issue(s)...

- Students assigned to alternative schools without documented transition plans
- Students with disabilities placed in alternative settings **without ensuring FAPE**
- Missing manifestation determination and placement decision procedures
- IEP services not consistently implemented in alternative programs
- Lack of appropriately licensed special education staff assigned to alternative programs
- Insufficient communication between home schools and alternative programs
- Alternative education manuals did not clearly define:
 - Placement procedures
 - **Service delivery requirements**
 - Transition expectations
 - Roles and responsibilities



Alternative Education Oversight: The Solution(s)

- Develop Comprehensive Written Procedures
 - Formal Transition Plans
 - Entry and exit processes
 - Reentry supports
 - Communication protocols
 - Required documentation
- FAPE Requirements
 - Continuation of all IEP services
 - Service delivery by appropriately endorsed staff
 - Monitoring of implementation
- Special Education Procedures
 - Manifestation determination process
 - IEP team involvement
 - Placement decision procedures
 - Compensatory education considerations
- Train Staff After State Approval
 - School administrators, special education teachers, alternative school staff, related service providers, district leadership



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Trends, Issues, and Solutions: Perkins V

Kiyah Moore

Perkin V: Cross-Cutting The Trend(s)...

- Size, Scope, and Quality Indicator portfolios lacking evidence of required activities and artifacts.



Perkin V: Cross-Cutting

The Issue(s)...

- Missing current and ongoing advisory council consultation.
- No evidence of integration of appropriate grade level academic, technical, employability, AND leadership skill development in high skill, high wage, and/or in-demand opportunities in the aligned program(s) of study.
- Lack of activities demonstrating parent/guardian and student advisement.
- Lacking evidence of EPSO connections or articulation agreements.
- Photos without narratives.



Perkin V: Cross-Cutting

The Solution(s)

- Ensure all programs of study (POS) record evidence of active advisory councils engaging in consultation.
- Collect evidence of activities supporting appropriate grade level academic, technical, employability, AND leadership skill development; ensure it is apparent which area the evidence connects to.
- Collect evidence of ongoing activities revolving around parent and student engagement in career exploration activities.
- Include all postsecondary and workforce connections and agreements.
- Ensure all photos include a narrative and state what it is evidence of and how it connects to the required area of the indicators.



Perkins V: Cross-Cutting CLNA

The Trend(s)...

- Ongoing consultation for the Comprehensive Local Needs Assessment (CLNA) involving required stakeholders.



Perkins V: Cross-Cutting CLNA

The Issue(s)...

- Not all required stakeholders were consulted regarding the CLNA.
- Required topics were not discussed regarding the CLNA.



Perkins V: Cross-Cutting CLNA

The Solution(s)

- Ensure all POS are engaging in consultation with representatives of all required stakeholder groups.
- Compile a list of all stakeholders and which role they fill regarding the required stakeholder groups.
- Ensure that the required topics are discussed over the course of the two-year CLNA process.



Perkins V: Effective Educators

The Trend(s)...

- Lack of formal evaluation of professional development (PD) opportunities funded using Perkins V funds.



Perkins V: Effective Educators

The Trend(s)...

- PD opportunities not being evaluated to determine if the opportunity is justified and necessary to the federal grant.
- PD surveys are inadequate to collect data that would benefit the decision-making process around CTE activities and opportunities.



Perkins V: Effective Educators

The Solution(s)

- Surveys are completed by all PD attendees.
- Surveys contain adequate questions and collect quality feedback.
- Use surveys to assist in planning for future PD opportunities and in the revision or completion of the CTE local application.



Perkins V: Special Populations

The Trend(s)...

- Lack of processes for identifying students in special populations, as defined by Perkins V, in order to collect, disaggregate, and analyze data.



Perkins V: Special Populations

The Issue(s)...

- LEAs/schools not identifying students in all special populations groups as defined in Perkins V.
- Lack of collection of data around all aspect of CTE activities and opportunities for special populations.
- No comprehensive **ongoing** process students may identify themselves as belonging to a specific population.



Perkins V: Special Populations

The Solution(s)

- Add mechanisms and tools allowing student self-identification.
 - Posters with QR codes or links where students may report their circumstances.
 - Adding an area to the registration form.
 - Making links to this information available on the LEA website.
- CTE directors collect data regarding special populations groups.
 - Train relevant staff on the data to be collected and processes.
 - Calendaring dates to check on data collection and processing.
 - Using the data to make decisions regarding CTE and POS.
 - Identify gaps and barriers and take steps to eliminate those.



Perkins V: Special Populations- EL

The Trend(s)...

- Ensuring communication takes place with all families and students in a language and manner they can understand.



Perkins V: Special Populations- EL

The Issue(s)...

- Lack of evidence of students and parents being consulted on the POS offerings and activities in multiple languages or in different manners of communication, depending on the needs of the student or family.
- No interpreters or translators involved in the communication of applicable information with families.



Perkins V: Special Populations- EL

The Solution(s)

- Provide POS guides, website information, and additional CTE resources in multiple languages and in different communication methods.
- Use ILPs and home language surveys to ensure resources are provided in languages and manners that would benefit families.



Perkins V: Students with Disabilities

The Trend(s)...

- Ensuring strategies are in place to increase Career and Student Technical Organization (CTSO) participation for students with disabilities while collecting data around this population of students.



Perkins V: Students with Disabilities

The Issue(s)...

- Lack of evidence and process to increase the recruitment and participation for SWD within CTSO competitions and opportunities.
- Lack of the collection of data regarding the participation of SWD in CTSOs.



Perkins V: Students with Disabilities

The Solution(s)

- Train and require CTSO advisors to recruit and make available all opportunities to SWD.
 - Ensure this is expressly communicated and encouraged for SWD.
 - Provide accommodations and modifications as described in the IEP.
- Use CTSO registrations to cross-reference data using the SIS.
 - Utilize this data to determine next steps in the improvement of CTE courses and opportunities for SWD.



Perkins V: SWD- Career Guidance

The Trend(s)...

- Ensuring specific and differentiated career guidance and academic counseling for SWD is taking place in an ongoing manner.



Perkins V: SWD- Career Guidance

The Issue(s)...

- Lacking differentiated strategies to guide SWD in career exploration and POS course selection.
- One uniform process for all students that lacks in-depth assistance in career guidance in alignment with transition plans.



Perkins V: SWD- Career Guidance

The Solution(s)

- Working with the IEP team/coordinator to ensure guidance is given in conjunction with the transition plan.
- Use the transition plan to help guide conversations with SWD on the available opportunities in secondary and possible avenues to ensure postsecondary success.
- Ensuring a process is recorded, and all stakeholders understand the process.



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Trends, Issues, and Solutions: Fiscal

Michael Gateley

Fiscal: Compensation

The Trend(s)...

- Insufficient payroll and time-and-effort documentation.



Fiscal: Compensation

The Issue(s)...

- Inadequate time and effort documentation may be a result of weak internal controls, leading to additional areas of non-compliance.
- Missing or incomplete time and effort documentation.
- Certifications signed before the end of the work performance period.
- Time and effort documentation not reconciled to actual payroll charges.
- Positions charged to grant not reconciled against the positions approved in the grant budget.



Fiscal: Compensation

The Solution(s)

- Review of procedures and update as needed.
- Conduct internal self-audits of expenditures.
- Cross-train staff.
- Reconcile payroll expenditures.
- Collect missing certifications.
- Review salary allocations.



Fiscal: General Fiscal

The Trend(s)...

- Weak internal controls and inadequate fiscal procedure documentation.



Fiscal: General Fiscal

The Issue(s)...

- Lack of or incomplete fiscal procedures.
- No segregation of fiscal duties.
- Comprehensive reviews of policies and procedures not being performed on a regular basis.
- Internal controls risk analysis not performed and/or documented.
- Reimbursement requests not made on a regular basis and according to written procedures.



Fiscal: General Fiscal

The Solution(s)

- Perform annual reviews of fiscal policies and procedures, and update as needed.
- Conduct internal self-audits regularly throughout the fiscal year.
- Cross-train staff on applicable topics.
- Make regular and timely reimbursement requests
 - Recommended at least monthly



Fiscal: Travel

The Trend(s)...

- Missing travel documentation or unsupported travel costs.



Fiscal: Travel

The Issue(s)...

- Missing travel requests, agendas, receipts, and any other documents as described in the LEA policy.
- Travel not aligning to a specific grant.
- Written pre-approval by the program director not obtained.



Fiscal: Travel

The Solution(s)

- Use travel pre-authorization and reimbursement forms.
- Require written pre-approval by the program director to verify allowability.
- Require after-the-fact review of travel claim by the program director before the employee is reimbursed.
- Program director's travel pre-approval and reimbursement claim approval given in writing by their supervisor.
- Reimbursement only after all required documentation is provided.



Fiscal: IDEA Use of Funds

The Trend(s)...

- Insufficient evidence connecting expenditures to approved activities, and no evidence of direct benefit to specific populations of students as required in the federal grant.



Fiscal: IDEA Use of Funds

The Issue(s)...

- No review of expenditures against applications.
- No documentation of programmatic purpose.
- Incomplete or no maintenance of service documentation for third-party service providers.
- Insufficient documentation to support expenditures claimed on the State Special Education Expenditure Report (SSEER).
- Not properly tracking expenditures for CCEIS and equitable services.



Fiscal: IDEA Use of Funds

The Solution(s)

- Conduct monthly budget reviews.
- Require program approval before purchases.
- Conduct self-monitoring regularly.
- Provide fiscal training to all applicable staff.



Fiscal: Procurement

The Trend(s)...

- Procurement files lacking competition, conflict-of-interest, or oversight documentation.



Fiscal: Procurement

The Issue(s)...

- Lack of processes around competition.
- Conflicts of interest being present and undisclosed.
- Proper documentation not being collected and maintained.
- Purchasing policies and procedures not aligned.



Fiscal: Procurement

The Solution(s)

- Reconstruct procurement files.
- Review thresholds and requirements.
- Strengthen monitoring.
- Use procurement checklists.
- Provide annual training for all applicable staff.



Fiscal: Equipment

The Trend(s)...

- Inventory management deficiencies and inadequate equipment records.



Fiscal: Equipment

The Issue(s)...

- Physical inventory not conducted.
- Inventory records are incomplete or do not exist.
- Disposition procedures not followed as required.
- Items purchased with federal funds not tagged and identified.
- Locations of the items purchased with federal funds were mislabeled or not included in the inventory documentation.



Fiscal: Equipment

The Solution(s)

- Conduct physical inventories at least once every two years, but recommended annually, and in accordance with written policies and procedures.
 - Maintain documentation showing the inventory was conducted, what date, who performed the review, etc.
 - Reconcile inventory to property records.
- Update property records (inventory listings) to be complete and accurate.
 - Update records when equipment status changes occur.
- Tag federally funded equipment.
- Maintain equipment procedures.



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Trends, Issues, and Solutions: Cross-Cutting and Other

Michael Gateley

Cross-Cutting 5-Year Plan

The Trend(s)...

- Lack of a current 5-year strategic plan, outdated 5-year plan, or no plan on the LEA website.



Cross-Cutting 5-Year Plan

The Issue(s)...

- The LEA has an outdated LEA 5-year strategic plan.
- The 5-year strategic plan lacks the specific goals, action steps, data, etc. as required in T.C.A.
- The 5-year plan is not updated and revised at least every two years.



Cross-Cutting 5-Year Plan

The Solution(s)

- Review the 5-year strategic plan annually as an LEA team to update and revise goals and action steps.
 - Using data collected to update the plan ensures alignment with the needs of the students and district.
 - Work in conjunction with the local board of education as required in T.C.A.
- Ensure the updated plan is linked on the LEA website.



Cross-Cutting Barriers to Enrollment

The Trend(s)...

- LEA and school registration documentation requirements misaligned with federal requirements to ensure education is provided to students without delay.



Cross-Cutting Barriers to Enrollment

The Issue(s)...

- Registration documents requiring social security numbers, birth certificates, or other documentation that may be a barrier to immediate enrollment for specific subgroups of students, such as students experiencing homelessness.
- Information in the registration portal and the LEA/school websites not aligning.
 - One or both may contain barriers to immediate enrollment.



Cross-Cutting Barriers to Enrollment

The Solution(s)

- Audit all registration packets and online guidance.
 - Ensure language that could be seen as a barrier to immediate enrollment is removed.
 - Mark SSN and birth certificate as optional documents required at the time of enrollment.
- Train staff to support students and families in locating and obtaining this information/documentation once the student has been enrolled.



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Most Common Questions

Let's chat!

- I have a conflict with the date we received...
- I uploaded the wrong thing! What do I do?
- Who do I contact if I'm not sure what to upload?
- Hypothetically...
- Can I have an extension?
- **Questions from the Q&A/Chat**



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Conclusion and Contacts

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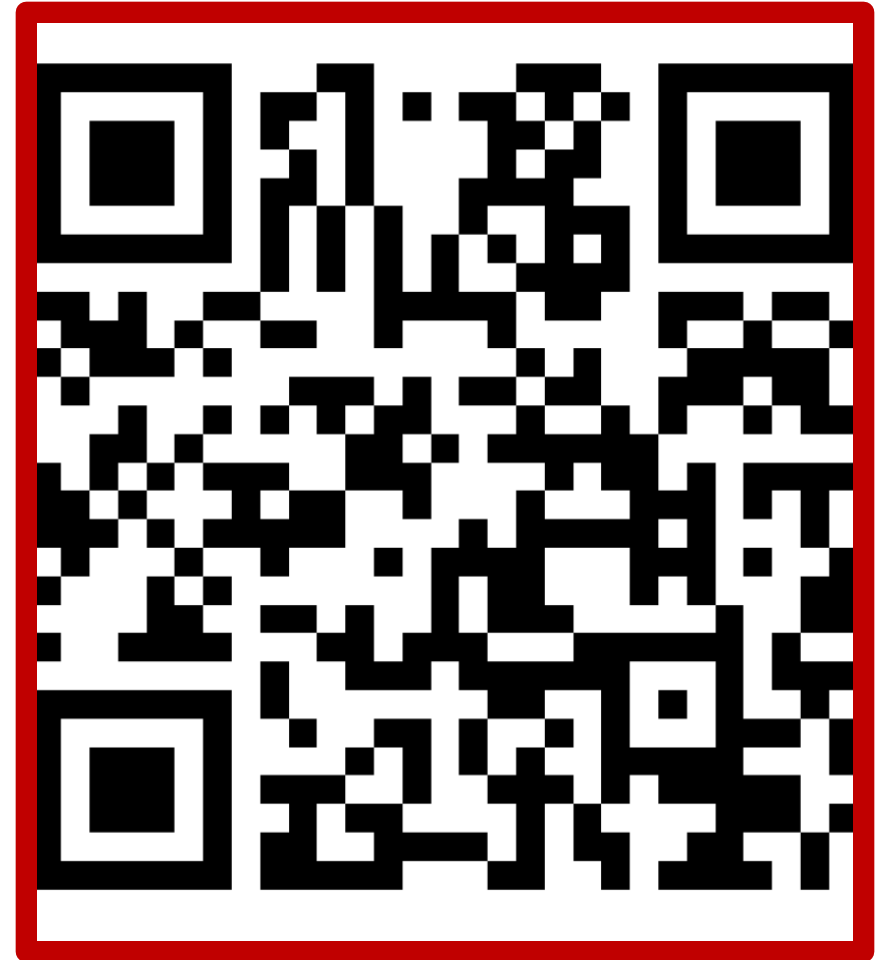
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Thank you!

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