Consolidated Monitoring Risk Definitions

Districts are selected for consolidated monitoring using a risk assessment tool developed in accordance with the Uniform Grant Guidance regarding monitoring, including 2 CFR (Code of Federal Regulations) 200.332 and 2 CFR 200.519. In relation to consolidated monitoring, the term ‘risk’ refers to factors or scenarios which increase the likelihood of non-compliance with program requirements and failure to achieve program goals. The Uniform Grant Guidance does not specify the factors that must be considered in its evaluation of risk. The Kentucky Department of Education’s (KDE) risk tool examines common factors as well as program-specific risk factors.

KDE uses a point system to evaluate a district’s level of risk. A point range is established for each risk category, and points are assigned with lower point totals representing lower risk and higher point totals representing higher risk. The risk points are totaled across all categories to determine the district’s overall risk; the higher the total, the higher the district’s risk of non-compliance. Many times, the districts with the highest scoring totals are selected for monitoring as they have the higher risk of not being in compliance with program requirements. However, through discussions across KDE program staff, other factors may weigh heavily in selecting districts for monitoring, such as time since the last consolidated monitoring visit or whether districts have been selected for other types of monitoring during the current or previous year. It is important to remember that having a higher assigned risk point total does not mean a district is doing a poor job or that it is not meeting requirements. Risk assessment is just a required tool to help KDE determine where to focus limited time and resources.

Common Risk Factors

Direct questions to the point of contact on KDE’s Statewide Consolidated Monitoring webpage.

Common Risk Factor	Justification/Explanation
Award size	Larger award amounts are associated with higher risk. The more grant funds available to the district, the more oversight is required to track and monitor funds. Points are assigned based on the combined total award across all participating programs.
Number of participating programs	Risk increases with the number of participating programs. Each program has its own set of requirements that districts must be familiar with and as the number of programs increases so does the potential for overlooking a requirement. Points are assigned for each monitoring program in which the district participates.
Audit findings	Points are assigned for federal compliance findings requiring corrective action on the most recent single audit. The single audit focuses on fiscal compliance as opposed to program compliance and the identification of a fiscal compliance issue could indicate the presence of other compliance issues.

Common Risk Factor	Justification/Explanation
Time since last on-site monitoring	The more time that passes between on-site monitoring increases risk. On-site monitoring allows KDE to verify effective, compliant practices and work with districts to address any areas of non-compliance. If a district has not received technical assistance and feedback from monitoring for several years, it is unknown how well they are meeting requirements; that unknown is a risk. Changes to federal requirements since the district was last monitored may result in a once-compliant practice no longer being sufficient. Also, ineffective processes could be perpetuated without corrective feedback. Points are assigned based on the number of years since the district last participated in consolidated monitoring.
Superintendent or finance officer is also federal programs coordinator	Division of program responsibilities and decision-making provides checks and balances for each program and ensures staff have sufficient time to meet all the program requirements. Points are assigned if the superintendent or finance officer also serves as the coordinator for one or more federal programs, as listed in Open House.
Single audit requirement	The single audit is conducted annually and provides a level of oversight to the awards a district receives. Without this annual review, the district has no way of knowing if there are any issues that need to be addressed. Points are assigned for districts that are not required to conduct and did not conduct the single audit during the previous school year.
Program coordinator’s years of experience	Being new to a role and/or new to a district can increase risk. Unfamiliarity with program requirements and/or district processes and procedures increases the likelihood of an error, which may lead to non-compliance. KDE uses Open House to determine each program coordinator’s years of experience in their current role and points are assigned to those with 3 or fewer years’ experience in that role within the district.
Finance officer’s years of experience	Points are assigned to districts whose finance officer has 3 or fewer years’ experience in that role within the district.
Superintendent’s years of experience	Points are assigned to districts whose superintendent has 3 or fewer years’ experience in that role within the district.
Equitable services	The participation of private/non-public (PNP) schools in federal programs comes with additional requirements and increased risk. Districts must be familiar with how funds are generated for services at PNP schools, who is eligible to receive services and the allowable uses of funds which may differ slightly from the allowable uses of funds at public schools. Points are assigned for each federal program with one or more participating PNP school.

Common Risk Factor	Justification/Explanation
Returned unspent federal funds	Failure to spend all federal funds within the award period may indicate a lack of fiscal oversight. Points are assigned based on the percentage of funds returned for each participating federal program at the end of the most recently closed federal fiscal year.
Schools identified for CSI/TSI	Low student performance indicates that academic goals are not being met. There is a risk that implementation of improvement strategies is ineffective or that funds could be used in a more impactful manner. Points are awarded based on the number of schools in the district identified for comprehensive support and improvement (CSI) or targeted support and improvement (TSI).

Alternative Education Program

The alternative education program will begin participating in the risk assessment process for the 2027-2028 school year.

Preschool Risk Factors

Direct questions to the point of contact on KDE's [Preschool Services webpage].

Preschool Risk Factor	Justification/Explanation
Interdisciplinary Early Childhood Education (IECE) preschool teacher certification	704 KAR 3:410 states that lead teachers in the preschool program must hold a certificate or statement of eligibility for a certification in interdisciplinary early childhood education (IECE) or have been exempted by the Kentucky Education Professional Standards Board from additional certification in order to continue teaching in the field. Points are assigned to districts with any IECE preschool teachers listed as less than Professional, including Provisional and Temporary Provisional, Proficient, Probationary, Statement of Eligibility, K letters, etc.
Unapproved alternate schedule	704 KAR 3:410 states that a local school district must select one of the following options: a standard half-day, five day a week program (single sessions), a half-day, four day a week program in single or double sessions, or a locally designed program approved by the chief state school officer. Points are assigned to districts operating a locally designed program without prior approval.
Completed home visits	704 KAR 3:410 states that periodic home visits are completed by preschool staff with the first visit conducted within sixty (60) school days after enrollment. Points are assigned to districts that have not recorded the completion of any home visits.

Title I, Part A Risk Factors

Direct questions to the point of contact on KDE's [Title I, Part A webpage].

Title I-A Risk Factor	Justification/Explanation
Requested a carryover limitation waiver in the last 3 years	Title I funds are designed to be spent on the students that generated the money. Statute does allow districts to carryover up to 15% of their allocation without requesting a waiver. If a district is substantially over 15% and needs a waiver it potentially signals that there were issues with planning, implementation and/or foresight in the design and execution of the Title I plan. Points are assigned to districts that have requested a waiver within the last 3 years.
Findings from a previous desk monitoring	Compliance findings from a previous desk monitoring may indicate a more in-depth look at overall program implementation is required. This also provides KDE the opportunity to ensure that the measures put into place to address the desk monitoring finding continue to be implemented with fidelity. Points are assigned to districts that received findings during the 3 most recent desk monitoring cycles.
Significant issues delaying the previous year's application approval	Timely submission of the original application allows the district to begin implementing Title I plans and drawing down funds as soon as possible. Districts have approximately 6-8 weeks to complete the Grant Management Application and Planning (GMAP) application during which they receive multiple reminders and technical assistance offers from KDE. Failure to adhere to established deadlines may indicate poor program planning/oversight. Operating without an approved application may lead to requirements being overlooked, the purchase of unallowable items, etc. Failure to adhere to established deadlines and/or respond to application errors identified by KDE can result in the application not receiving approval until later in the school year. Points are assigned to districts whose original Title I application did not receive approval more than 2 months after the application due date. This does not include extenuating circumstances out of the district's control which may impact the timely submission and revision of the application.

Title I, Part A Neglected Risk Factors

Direct questions to the point of contact on KDE's [Neglected & Delinquent webpage].

Title I-A Neglected Risk Factor	Justification/Explanation
Child count data	When a district experiences 25% (or more) year-to-year changes and/or has inconsistencies in data, it indicates a risk that they may not be correctly compiling annual child count data. Accurate child

Title I-A Neglected Risk Factor	Justification/Explanation
	count data is important as it generates program funding and is subject to audit by the U.S. Department of Education. Large changes and/or inconsistencies in the data can also be indicative of a significant change in the charter and/or purpose of the facility, which may impact the facility's ability to meet all requirements. Points are assigned to districts with facilities with a 25% (or more) year-to-year change in child count data and/or facilities with inconsistencies in their data.
Facility changes	The opening of a neglected facility brings with it new responsibilities and requirements which the district will not be familiar with. The lack of experience in working with a neglected facility increases the risk of requirements not being met. Points are assigned to districts where a facility has opened in the past 2 years.

Title II, Part A Risk Factors

Direct questions to the point of contact on KDE's Title II, Part A webpage.

Title II-A Risk Factor	Justification/Explanation
Funds used for class size reduction	There is a higher potential for risks if the district uses funds for class size reduction (CSR) and even more risk if all of the program funds are used for CSR. The period of time that the teacher has been in that position is reviewed to determine if class size reduction is contributing to positive student outcomes. Points are assigned to districts using Title II-A funds for CSR.
High percentage of teacher turnover	The higher the teacher turnover, the higher the risk of at-risk students not receiving equitable access to effective educators. Points are assigned to districts with 10% or higher teacher turnover in the previous school year.
Significant issues in the previous year's Title II-A application	There is increased risk if a district needs substantial, ongoing technical assistance to correct significant issues. This could include numerous or critical errors in the previous year's application, failure to adhere to multiple reminders, GMAP application requests are not satisfied with multiple revisions needed, and so on. Points are assigned to districts requiring technical assistance for significant issues in the previous year's Title II-A application.

Title III Risk Factors

Direct questions to the point of contact on KDE's Title III webpage.

Title III Risk Factor	Justification/Explanation
Schools identified as ATSI/TSI for the EL subgroup	ATSI/TSI schools are the 5% lowest performing schools due to student subgroup performance, including English learners (ELs). Points are assigned to districts with schools identified as targeted support and improvement (TSI) or additional targeted support and improvement (ATSI) for the EL subgroup.
Late submission of Intent to Participate or Declaration of Participation	Timely submissions for Title III ensures districts adhere to established deadlines. Failure to adhere to established deadlines by KDE can indicate issues with program planning/oversight. Points are assigned to districts that do not submit the Title III Intent to Participate and/or Declaration of Participation by the deadlines set by KDE.

Title IV, Part A Risk Factors

Direct questions to the point of contact on KDE's Title IV, Part A webpage.

Title IV-A Risk Factor	Justification/Explanation
Number of reviews on previous year's application	The greater the number of GMAP submissions of the Title IV, Part A application before an approval can indicate a concern with the district Title IV, Part A coordinator. This can indicate the need for improved grant management and fiscal responsibility at the district. Applications that have been reviewed three or more times before an approval and/or applications that are submitted past the application deadline are factors that are evaluated when determining risk. Points are assigned to districts which required 3 or more reviews of the previous year's Title IV-A application prior to receiving KDE approval.
Needs assessment and distribution of funds requirement	Districts receiving and retaining $30,000 or more in grant funding are required to conduct a data driven Comprehensive Needs Assessment at least once every three years and must also allocate funds into all three content areas of the Title IV, Part A grant (at least 20% in Well-Rounded Education, at least 20% in Safe and Healthy Students, and a portion in Effective Use of Technology). This expands how funds can be used and increases the possible risk of error when spending funds. Points are assigned to districts required to complete the needs assessment and divide funds across all three content areas based on allocation size.
Technology hardware or software purchases	Districts that wish to purchase technology infrastructure using Title IV, Part A funds cannot use more than 15% of the amount in the Effective Use of Technology category (not 15% of the entire grant

Title IV-A Risk Factor	Justification/Explanation
	amount) on devices, equipment, software applications, platforms, digital instructional resources and/or other one-time IT purchases. This includes hardware/software purchased for private non-public schools. Due to the specific nature of this rule, this is a risk factor. Points are assigned to districts that used Title IV-A funds to purchase technology hardware or software during the previous school year.

Title V, Part B Risk Factors

Direct questions to the point of contact on KDE's [Title V, Part B webpage].

Title V-B Risk Factor	Justification/Explanation
Application submission	Failure to submit the application on time may indicate a lack of planning as well as the presence of deeper issues with the district's Title V program. Points are assigned to districts that did not submit the previous year's Title V-B application by the due date set by KDE.
Significant application issues	Failure to address identified issues may indicate a lack of attention to detail and increases the potential for larger issues within the program. Points are assigned to districts that failed to fix the same issue on their Title V-B application after two or more attempts and/or failed to respond to KDE's technical assistance.
Failure to draw down funds	Failure to spend funds in a timely fashion over the life of the grant may indicate a lack of planning and intentionality in the use of program funds. Points are assigned to districts that failed to draw down the previous year's Title V-B funds for six or more consecutive months. Districts that have already drawn down all funds are not awarded any risk points for this factor.