

Federally Funded Positions and Requirements for K-12 Education in Tennessee

Office of Research & Education Accountability

11.5.25

TENNESSEE COMPTROLLER OF THE TREASURY



Presentation overview

- Federally funded positions across school districts
- District requirements for reporting and monitoring
- TDOE risk analysis process

Public Chapter 454 (2025)

Tennessee Code Annotated (TCA) 49-1-109(f) states:

The task force shall:

- (1) Identify all federal funding allocated to the department of education and LEAs in this state for the previous fiscal year for kindergarten through grade twelve (K-12) education, specifying the federal program from which any such funds are allocated, the uses of the allocations by the department or LEAs, and the amount of the allocations;
- (2) Identify the federal requirements that the state or an LEA must comply with in order to receive the federal funding identified in subdivision (f)(1);
- (3) Identify the state and LEA obligations and resources that are necessary in order to receive the federal funding identified in subdivision (f)(1);
- (4) Identify the number of state and local employment positions funded through the federal allocations identified in subdivision (f)(1); and**
- (5) Consider whether programs or resources provided using the federal funding identified in subdivision (f)(1) should be continued at the state level if the federal funding is eliminated.

OREA will focus on addressing item 4 in PC 454 (2025).

Districts report the number of federally funded **full-time equivalent** staff (FTEs) for the following programs:

- Title I (for disadvantaged students)
- Title II (supporting effective instruction)
- Title III (English language learners)
- Title IV (for extended learning programs)
- Title V (rural and low-income schools)
- IDEA (for students with disabilities)

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OREA analyzed the number of FTEs statewide, by federal program, and by district size. District size was determined with the following parameters:

- Small districts (enrollment of 3,000 students or less)
- Medium districts (enrollment between 3,001 and 9,999 students)
- Large districts (enrollment of 10,000 students or more)

Metro Nashville Public Schools and Memphis-Shelby County Schools were analyzed separately due to their size.

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Statewide federally funded FTEs

Across 142 school districts in Tennessee, there are over 6,000 federally funded FTEs, making up almost 8 percent of all FTEs. Statewide totals for federal and state FTEs are below.

2024-25					
	District count	Total federal FTEs	Total state FTEs	Total FTEs	Percent of federally funded FTEs
All districts	142	6,358.7	77,359.8	83,740.9	7.6%

Most federally funded FTEs are allocated for services related to Title I and IDEA. Districts can also allocate FTEs for consolidated admin and school pool. Those positions represent flexible options districts can utilize to group funds and eliminate the need to account for these funds on a program-by-program basis. Statewide FTEs by program are detailed below.

Title I	Title II	Title III	Title IV
4,061.44	291.4	100.13	87.03
Title V	IDEA	Con admin	School pool
40.93	1,369.88	229.09	178.78

Source: OREA analysis of TDOE data.

Note: District count excludes state-run districts such as Department of Children's Services, Alvin C. York Institute, TN School for the Blind, TN Schools for the Deaf, and Department of Correction.

Comparison across district groups

	District count	Total federal FTEs	Total state FTEs	Total FTEs	Average percent of federally funded FTEs
Small district (3,000 students or less)	69	978.5	9,597.5	10,576	9.8%
Medium district (between 3,001 and 9,999 students)	59	2,249.4	25,623	27,872.4	9.1%
Large district (10,000 students or more)	12	1,444.2	28,809.3	30,253.5	5.1%

Source: OREA analysis of TDOE data.

Note: Data excludes Memphis-Shelby County Schools and Metro Nashville Public Schools.

- Small districts have the highest average rate of federally funded FTEs at almost 10 percent.
- Federally funded FTEs make up over 9 percent of positions across medium districts.
- To account for variance within district groups, average percent of federally funded FTEs was used in the analysis. First, OREA calculated each district's percentage of federally funded FTEs. Then, the percentages for all districts in the group were averaged together.

Small district FTEs

2024-25					
	District count	Total federal FTEs	Total state FTEs	Total FTEs	Average percent of federally funded FTEs
Small district (3,000 students or less)	69	978.5	9,597.5	10,576	9.8%

Title I	Title II	Title III	Title IV
622.69	26.77	3.11	10.51
Title V	IDEA	Con admin	School pool
21.58	176.21	41.66	75.95

Source: OREA analysis of TDOE data.

- Approximately 10 percent of total FTEs in these districts were funded with federal dollars in FY 2024-25.
- When compared to medium and large districts, small districts have the highest average rate of federally funded FTEs.
- Consolidated admin and school pool are flexible options districts can utilize to group funds and eliminate the need to account for these funds on a program-by-program basis.

Medium district FTEs

2024-25					
	District count	Total federal FTEs	Total state FTEs	Total FTEs	Average percent of federally funded FTEs
Medium district (between 3,001 and 9,999 students)	59	2,249.4	25,623	27,872.4	9.1%

Title I	Title II	Title III	Title IV
1365.68	105.75	14.18	28.49
Title V	IDEA	Con admin	School pool
19.35	533.07	71.43	102.83

Source: OREA analysis of TDOE data.

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- Approximately 9 percent of total FTEs in these districts were funded with federal dollars in FY 2024-25.
- Consolidated admin and school pool are flexible options districts can utilize to group funds and eliminate the need to account for these funds on a program-by-program basis.



Large district FTEs

2024-25					
	District count	Total federal FTEs	Total state FTEs	Total FTEs	Average percent of federally funded FTEs
Large district (10,000 students or more)	12	1,444.2	28,809.3	30,253.5	5.1%

Title I	Title II	Title III	Title IV
850.05	67.38	20.34	37.03
Title V	IDEA	Con admin	School pool
0	413.6	45.1	0

Source: OREA analysis of TDOE data.

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- Just over 5 percent of total FTEs in these districts were funded with federal dollars in FY 2024-25.
- Consolidated admin and school pool are flexible options districts can utilize to group funds and eliminate the need to account for these funds on a program-by-program basis.
- Excludes Metro Nashville Public Schools and Memphis-Shelby County Schools.



MSCS and MNPS FTEs

Memphis-Shelby County Schools

Total federal FTEs	Total state FTEs
1,112.2	6,727
Total FTEs	Percent of federally funded FTEs
7,839.2	14.2%

Title I	Title II	Title III	Title IV
856.7	43	43.5	11
Title V	IDEA	Con admin	School pool
0	113	42	0

Metro Nashville Public Schools

Total federal FTEs	Total state FTEs
596.7	6,603.1
Total FTEs	Percent of federally funded FTEs
7,199.8	8.3%

Title I	Title II	Title III	Title IV
366.32	67.38	19	0
Title V	IDEA	Con admin	School pool
0	134	28.9	0

Source: OREA analysis of TDOE data.

- Over 14 percent of FTEs are funded with federal dollars in MSCS, and over 8 percent of FTEs are federally funded in MNPS.
- These districts had the highest number of total FTEs for Title I, Title II, Title III, and IDEA.

District requirements for federal funding

OREA examined the district requirements for federal funding in the following ways:

- Analysis of documentation sent by districts for state and federal compliance, including the **consolidated funding application**
- Identification of other mechanisms used by TDOE for district monitoring, such as the annual **risk assessment analysis**
- Interviews with **federal program directors** at the district level

Districts regularly submit budget information, student enrollment data, and written documentation supporting their use of federal funds.

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Requirements in funding applications

The consolidated funding application (CFA) includes funding awards for Title I, Title II, Title III, Title IV, Title V, and IDEA.

By program, district leaders complete the application and submit to TDOE for approval or revision. The application requires comprehensive data and information. Examples include:

- | | |
|-----------------|---|
| Title I, Part A | Provide a budget narrative for every line item to appropriately explain and describe expenditures. |
| Title I, Part A | Specify professional development to support, the number and staff to participate, and expenses. |
| Title I, Part A | Describe services to purchase if contracting staff or services. |
| Title I, Part A | Describe how the district provides transportation for students experiencing homelessness. |
| Title I, Part C | Describe the process for developing and submitting needs assessments for eligible migratory students. |

Examples of application requirements, continued

Title I, Part D	Describe how the program finds alternative placements for children and youth.
Title II, Part A	Describe how activities supported by this fund are in support of one or more strategies in district plan.
Title III, Part A	Describe the activities and strategies that enhance language instruction for English learners.
Title IV, Part A	Indicate whether funds will be directed to pre-K students and/or instructional staff.
Title IV, Part A	Detail plans to meaningfully consult with parents, teachers, principals, and community stakeholders.
Title V, Part B	Provide a clear narrative of the activities, programs, and services to be funded.
Title V, Part B	Detail both a head count and FTE for all school-based and system-wide instructional and support staff.
IDEA	Provide documentation confirming district has budgeted maintenance of effort requirements.
IDEA	Provide information about special transportation provided to students with disabilities.
IDEA	For equipment that requires prior approval, provide budget codes, description, cost, and justification.
IDEA	Include personnel details for teachers, education assistants, nurses, psychologists for ages 3-5 and 6-21.

For the full list of CFA requirements and additional guidance, see [TDOE's Technical Application Guide](#).

Risk analysis and results-based monitoring

OREA identified TDOE's risk analysis assessment as another tool created to maintain compliance with federal regulations. TDOE must:

- conduct a risk analysis;
- evaluate each district's risk of non-compliance for purposes of determining appropriate monitoring; and
- monitor districts to ensure compliance and performance goals are achieved.

As a district's assessed risk increases, the level of monitoring increases.

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Examples of risk analysis data factors

ESSA

Subgroup data for English learners, students in foster care, students experiencing homelessness, migratory students, and military dependents

ESSA complaints with findings

ESSA and ESL director years of experience

IDEA

Final score of the Annual Performance Report (APR), which scores implementation of special education programs

IDEA complaint findings/due process final orders

IEP monitoring risk

Perkins (CTE)

CTE director attendance at professional development

Monitoring action steps for findings of non-compliance or corrections needed

CTE director years of experience

Fiscal

Single audit findings

Annual financial report findings

Centralized financial office

Award allocation amount

ESSA or IDEA excess carryover

Cross-cutting

Priority or Comprehensive Support and Improvement (CSI) schools

In Need of Improvement schools

One person is the director of both ESSA and IDEA

Director of Schools years of experience

Years since last level 3/on-site monitoring

Monitoring for ESSA/IDEA

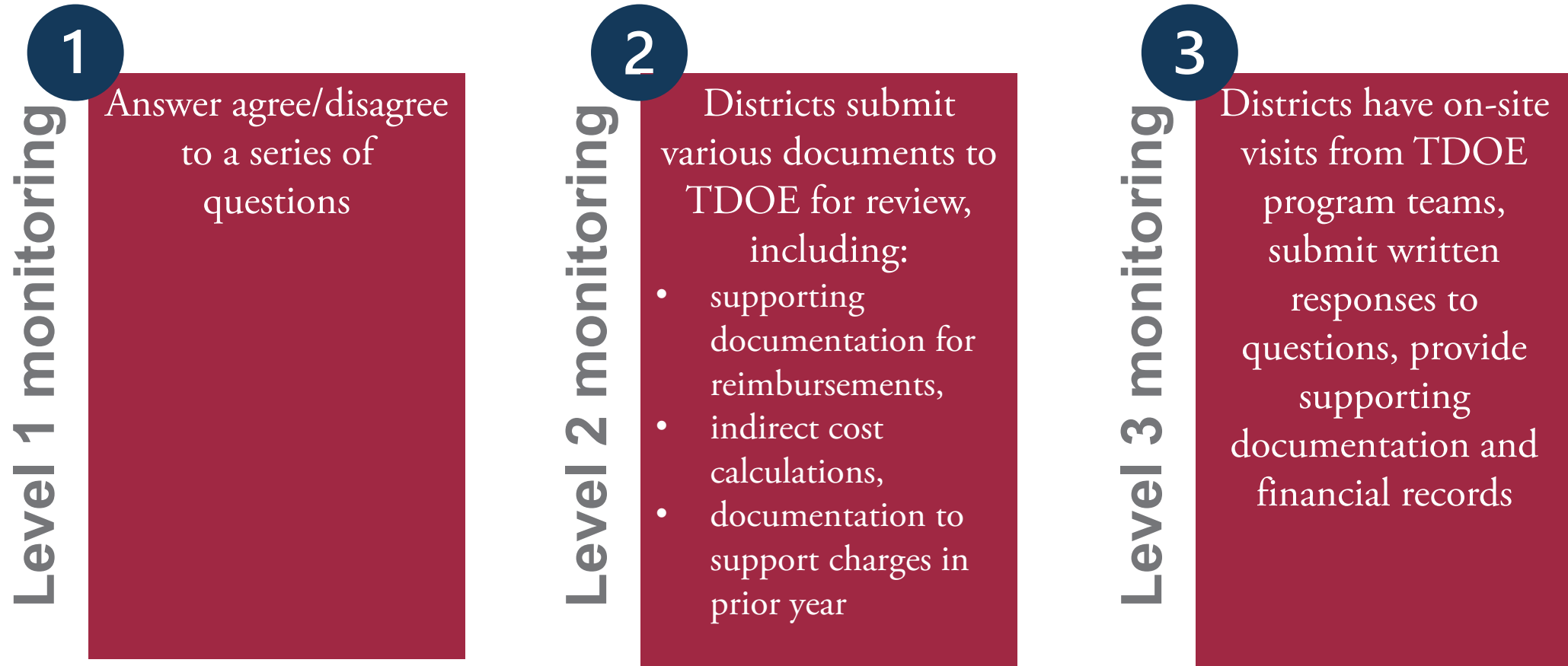
Monitoring for Perkins

Monitoring for fiscal findings

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Points are awarded on these factors. **More points = increased risk and a higher level of monitoring**

TDOE risk analysis monitoring levels



Source: Tennessee Department of Education.

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