2017–18 OCTAE Customized Technical Assistance to States

Final Summary Report for the State of Alabama

Prepared under contract to
U.S. Department of Education

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Portland, OR 97201

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Contents

Introduction

States and agencies that receive funding through the *Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV)* can apply to the U.S. Department of Education's Office of Career, Technical, and Adult Education (OCTAE) for technical assistance (TA) each year. The TA helps states improve their CTE data collection and reporting capacity and use those data to improve career and technical education (CTE) programs. RTI International provides TA to states through this program on behalf of OCTAE.

The Alabama State Department of Education (ALSDE) requested support in redesigning the state's secondary CTE program monitoring process in fall 2017. The state's current monitoring process, called business/industry certification (BIC), assesses program adherence to industry standards by reviewing teacher certification, course schedules and curriculum, counseling services, placement and follow-up procedures, professional development, student performance, and fiscal practices. Every program in the state is visited at least once in a five-year monitoring cycle. Every program must provide—and state and local staff must review—detailed documentation for the visits. ALSDE's TA application noted that recent reductions in state agency staff have made the labor-intensive process difficult to maintain. Moreover, ALSDE staff shared concerns that monitoring is looked upon at the local level as a process for ensuring regulatory compliance rather than program quality.

Mary Simon, Education Administrator at the ALSDE's Career and Technical Education/Workforce Development Division and Collie Wells, the division's Interim Deputy State Superintendent of Education collaborated with RTI staff to develop a TA plan, that consisted of three research activities, to inform the state's redesign of the monitoring process:

1. *Consultation with the state team*—preliminary and ongoing consultation with ALSDE staff resulted in a set of research questions that were refined and updated through two rounds of interviews and check-in meetings with ALSDE staff.
2. *State interviews*—RTI staff interviewed 15 CTE administrators from 10 states, 9 of which use risk-based monitoring, to gain a detailed perspective on CTE program monitoring practices (the interview protocol is included in Appendix A).
3. *Documentary research*—Documentary research included web research on state CTE monitoring practices, federal CTE monitoring guidance, and additional materials that state CTE administrators provided to supplement their responses to interview questions.

This report summarizes the findings of the research activities carried out during this TA project.

Technical Assistance

Researchers from RTI International worked with ALSDE staff to explore alternative forms of monitoring that promote program quality while minimizing the administrative burden associated with the monitoring process. ALSDE staff expressed an interest in learning about other states' approach to the entire monitoring process, including schedules, staff and stakeholder roles, strategies for collecting documentation, and the role of programmatic support. They also expressed an interest in how states use risk-based monitoring to focus and streamline monitoring work.

Risk-Based Monitoring

Risk-based monitoring uses "risk factors," or program components that may impact CTE program quality, to conduct an initial assessment and select providers for additional review and TA. State approaches to risk-based monitoring vary but follow a similar progression. In the first phase, typically two to three (and in a few states as many as seven) state agency staff members review documentation from CTE providers to score them against a set of risk factors.[1]

Using the results of this assessment, the staff flags a subset of providers for further review. The documents are typically submitted to state CTE staff electronically and may include responses to risk assessment questionnaires, local education agency (LEA) Perkins applications and budgets, inventory, fiscal audit findings, and others (see Appendix B for examples of documentation states collect at each stage in the monitoring process). The state uses the risk factors to compute a composite score indicating CTE providers' level of risk. How those scores are calculated, and the weight attached to each individual risk factor, varies from state to state.

The Uniform Grant Guidance of the Office of Management and Budget (OMB) requires the use of risk assessments but does not specify when and how grantees should conduct these

[1] For an example of a CTE risk assessment rubric, see Tennessee's Risk Based Monitoring Rubric at https://www.tn.gov/content/dam/tn/education/ccte/cte/cte_data_rbm_rubric.xls. Minnesota also provides a discussion of CTE program risk factors, and its monitoring process more generally, in its *Perkins IV* operational handbook at http://www.minnstate.edu/system/cte/consortium_resources/documents/Perkins-IV-Operational-Handbook-2016.pdf.

risk assessments.[2] However, the guidance document and its annual compliance supplements have included four categories of risk that grantees may consider:

1. Grantee's prior experience with the subrecipient
2. The results of previous audits (i.e., whether the subrecipient has a history of noncompliance)
3. Whether the subrecipient has new personnel or substantially changed systems
4. The extent and results of federal awarding agency monitoring (i.e., whether the subrecipient is monitored for compliance with other grants that it receives directly from a federal government agency)

The compliance supplement also notes that program complexity, proportion of grant awards passed through to subrecipients, and amount of dollar awards "may affect the nature, timing, and extent of during-the-award monitoring."[3]

Given a substantial degree of regulatory flexibility, states have adopted varied approaches in how they assess program risk and identify sites for additional monitoring. Review of state CTE monitoring policies and/or interviews with state agency staff yielded a list of over 90 risk factors (see Appendix C for a complete list) that the research team organized into nine categories. Four of these categories largely reflect the Uniform Grant Guidance and compliance supplements:

- **Monitoring history:** Results from previous reviews—for example, the number of negative findings from prior auditor general audits (as in Florida) and concerns identified for CTE programs during the most recent School Improvement Review (as in Iowa)—serve as risk factors, in alignment with the Uniform Grant Guidance and compliance supplement. However, states also consider the amount of time since a grantee's last monitoring visit (e.g., Colorado, Florida, Georgia, New Mexico, North Carolina, and Tennessee). By this metric, sites that have gone without a

[2] OMB called for a risk-based approach to monitoring federally funded programs in its *Circular No. A-133: Audits of States, Local Governments, and Non-Profit Organizations* ("A-133") in 1997. By 2010, the U.S. Department of Education (ED) recommended the approach as a "best practice" to federal education grantees. The OMB finalized its *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* ("Uniform Grant Guidance") in 2014, incorporating guidance from A-133 and other OMB circulars that introduced the requirement that "pass-through" entities, including federal grantees, assess the risk that grant subrecipients will fail to comply with federal grant requirements. ED adopted the Uniform Grant Guidance for all federal education grants in late 2014, including the requirement that grantees assess the risk of noncompliance from subrecipients during the monitoring process. The requirement applies to new and continuation grants awarded after December 25, 2014, and states have responded by incorporating risk assessment into their monitoring process.

[3] Office of Management and Budget, *2 CFR Part 200, Appendix XI: Compliance Supplement* (Washington, DC: Office of Management and Budget, 2017), 3.1-M-2 (p. 140 of PDF document). https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/circulars/A133/2017/Compliance_Supplement_2017.pdf.

monitoring visit for a set number of years are considered "higher risk" to ensure that subrecipients are regularly monitored.

- **Staff stability:** In accordance with the Uniform Grant Guidance, at least six states had risk factors related to staffing. Florida, Minnesota, Missouri, North Carolina, New Mexico, and Tennessee flag CTE providers with administrative turnover or new CTE directors for additional monitoring or TA.
- **Volume of grant funding:** In multiple states, the greater the amount of funding, the higher the "risk" and the more likely a site would be selected for additional monitoring. States that include grant funding amounts in their risk assessment include Florida, Missouri, North Carolina, New Mexico, and Tennessee.

States also use risk factors not identified as such in the Uniform Grant Guidance or compliance supplement. These factors fell into the following categories:

- **Finance:** Factors relating to finance accounted for roughly one-third of the risk factors used by the 9 states profiled in this report. Examples include whether CTE administrators can approve spending of Perkins funds,[4] lapsed or forfeited funds, spenddown rates, purchasing procedures, and whether the use of funds was consistent with the local Perkins plan. One CTE state director described problems with spenddown as a bellwether for a range of administrative issues (e.g., poor internal controls, limited authority to authorize spending)
- **Quantitative data findings:** Sites are also assessed on their performance on Perkins core accountability indicators (e.g., whether sites are at 90 percent of their performance targets or have met objectives of prior performance improvement plans), use of data to drive program improvement, or other uses of quantitative data.
- **Other program characteristics:** Factors related to program quality that were not otherwise categorized above include adherence to state-defined quality program standards, provisions for special populations, percentage of CTE programs that qualify as programs of study, use of advisory committees, and others.
- **Lack of professional development for CTE program staff:** Four states (Missouri, New Mexico, North Carolina, and Tennessee) assessed CTE provider risk on local program staff participation in professional development activities. In some cases, states specify that CTE director and teacher professional activities be carried out within a specific initiative (e.g., High Schools That Work in New Mexico). In other cases, states call for professional development activities that more generally promote the effective integration of challenging academic and technical curricula or provide relevant business experience to teachers (as in North Carolina).

[4] For example, New Mexico and Tennessee consider whether the CTE or project director has the authority "to plan and implement the budget."

Professional development activities may include meeting or conference attendance, in-service training, or other training opportunities.

- **Data quality concerns:** Three states—Colorado, New Mexico, and Tennessee—reported considering factors related to the quality or timely submission of CTE data.
- **Size of subrecipient:** Three states (Georgia, New Mexico, and North Carolina) described assessing local CTE providers for risk based on the size of the CTE subrecipient, including enrollment. The larger the subrecipient, the greater the likelihood of additional monitoring or an on-site visit.

As suggested by the examples above, states' use of the different types of risk factors vary (Table 1). Some types of risk factors, such as those related to monitoring history, are used by all states reviewed for this report. Others, such as a lack of professional development among CTE staff or data quality concerns, are used by fewer than half of the states.

Table 1. Risk factor use by state

Risk factor category	CO	FL	GA	IA	MN	MO	NM	NC	TN
Finance	X	X	X	X	X	X	X	X	X
Monitoring history	X	X		X	X	X	X	X	X
Quantitative data findings	X	X	X	X	X		X	X	X
Staff stability		X			X	X	X	X	X
Volume of grant funding		X				X	X	X	X
Other factors related to program characteristics			X	X	X		X		X
Lack of professional development						X	X	X	X
Data quality concerns	X				X		X		X
Size of subrecipient			X				X	X	

This summary of risk factors is not comprehensive; some states also select sites for additional monitoring based on factors that are not formally part of their risk assessment or other criteria. For example, CTE providers in Minnesota may be selected for on-site visits randomly to ensure that they are periodically monitored. And while "time since last visit" is not listed in New Mexico's risk assessment rubric, state CTE staff noted that this factor can influence the selection of sites that had not recently received a monitoring visit.

Desktop Monitoring

The initial review, or "risk assessment," flags sites for more focused or intensive monitoring, which may take the form of desktop or on-site monitoring. In desktop monitoring (sometimes called a "desk audit"), state CTE staff will request and review additional documentation from CTE providers and conduct telephone interviews with local staff but

do not travel to the CTE providers in person. This process may result in findings[5] and take the place of on-site monitoring, or it may serve as preparation for, or a supplement to, on-site monitoring. In Iowa, Minnesota, and North Carolina, for example, further review may mean desktop monitoring or an on-site visit. In these states, the greater the risk of noncompliance found during the risk assessment, the likelier that a subrecipient will be selected for on-site as opposed to desktop monitoring. States also conduct desktop monitoring to supplement on-site monitoring activities. Often, this step is used to gather and review documentation in advance of an on-site visit (as in Florida, New Mexico, North Carolina, and other states). Missouri conducts desktop monitoring as a follow-up to on-site visits.

On-Site Visits

On-site visits are the most labor- and time-intensive monitoring activity that states undertake. The visits typically include interviews with local CTE program administrators and staff, physical inventory reviews, classroom inspections, document review, and exit interviews. With few exceptions, on-site visits are reserved for "higher risk" CTE providers, for example, those with new CTE administrators, findings from previous audits, a history of missing Perkins student performance targets, unspent Perkins funds, and relatively large Perkins grants.

The number or percentage of sites that receive on-site visits varies from state to state, as do the methods by which states select providers for on-site visits. In North Carolina, six of the 18 sites identified as higher risk will be visited each year. In Colorado, state law mandates site visits for a minimum of 5 percent of CTE providers per year, though state CTE staff may visit more if resources permit. In Tennessee, providers are selected based on risk assessment cut scores, which vary from year to year depending on state monitoring capacity.

Once the on-site visits are planned and scheduled, state CTE staff will send CTE providers documents that introduce the process and what to expect and list requested documentation. State CTE offices will often bring in more staff to assist in monitoring visits; the total number of staff on-site may range from one to eight, depending on the state and size of the CTE provider. Documentation reviews during on-site visits are generally more comprehensive than earlier review stages and may include local CTE plans, performance improvement summaries, time and effort tracking, physical inventories, general ledgers, invoices, samples of transactions, and student transcripts. To the extent possible, states will request these documents in advance (e.g., during desktop monitoring); otherwise, the materials are reviewed on-site.

[5] Findings are citations of practices that are out of compliance with CTE program requirements, which CTE providers must take corrective actions to address.

Following the site visit, state staff give CTE providers a list of findings, recommendations, and corrective actions. States interviewed for this study generally limited "findings" to direct violations of law or policy and address other issues through recommendations or by sharing best practices. North Carolina includes commendations as well as recommendations in findings reports.

States were asked to identify the most valuable aspects of their monitoring process (i.e., what they would insist on keeping if they had to make cuts). Some states identified specific risk factors in response. For example, North Carolina noted that it would prioritize licensure (ensuring appropriate, qualified teachers), financial indicators, and performance indicators (e.g., technical skills, credentials), while Missouri underscored the importance of quantitative data and financial indicators. Other states highlighted more general features of the monitoring process, including efforts to align monitoring with state CTE plans or emphasize TA and program improvement during the monitoring process.

Additional Questions

Alabama shared the following questions about other states' CTE program monitoring systems in addition to its interest in the role of risk factors in the monitoring process. Based on information supplied by the states contacted for this study, the research team developed answers to each.

How many staff are involved in the monitoring process, and how long does it take? The number of staff involved in monitoring depended upon the state and the stage of monitoring. North Carolina and Tennessee both reported a total CTE program staff of approximately 35 people, which in North Carolina includes regional and program consultants. One to three staff collaborate on the initial risk analysis in both states, and the number of staff involved in on-site visits ranges from one to eight, depending on the size of the subrecipient being visited. The amount of time involved in monitoring also varies. In New Mexico, state CTE staff reported that it typically takes 20 business days to complete all on-site visits.

Could a risk-based monitoring process result in some sites "flying under the radar" or fail to catch sites that are struggling? States acknowledged that the switch to risk-based monitoring can mean that on-site monitoring visits are likely to be less frequent[6] but observed that a more focused process has allowed them to direct their attention and TA resources to CTE providers in greatest need of assistance. In addition, states have sought to limit the potential for sites to be passed over for review by assigning a higher level of risk to providers who have not received an on-site monitoring visit recently.

How does risk-based monitoring address staffing challenges, including potential reductions in state CTE staff? None of the states interviewed described the adoption of risk-based monitoring as having increased their monitoring burden, and several noted that moving to risk-based monitoring either coincided with or was motivated in part by reductions in staff.[7]

What role does programmatic review and TA play in other states' monitoring processes? New Mexico CTE staff has aligned its monitoring tool with state CTE goals and revised its process to include programmatic reviews in addition to compliance. Alignment with state-defined CTE goals has served two purposes: At the system level, it ensures that those goals are prioritized and reflected in assessments of program quality. At the local level,

[6] Many states had only recently adopted risk-based monitoring and were not yet able to comment on changes to the frequency of on-site visits.

[7] For example, CTE staff members in Iowa noted that they had moved to risk-based monitoring partly because they no longer had regional consultants to assist in monitoring.

it promotes a shift in emphasis among local CTE staff, away from "checking boxes" and toward documenting how CTE programs are serving state goals. In Florida and North Carolina, state staff attributed district staff's positive view of monitoring (rather than as a burden) to the TA provided through the process. As a result, both states would seek to continue TA even if faced with resource reductions. In fact, several states have monitoring approaches oriented toward TA. New Mexico and North Carolina do so by deliberately creating and reinforcing a vision of "monitoring-as-technical-assistance" among their monitoring staff. States also cited some specific practices as contributing a positive perception of monitoring: e.g., including staff turnover as a risk factor (so that new directors are prioritized for an on-site visit) and including commendations as well as recommendations in findings (North Carolina).

What role does the monitoring process play in outreach efforts to business and industry? Alabama officials cite the BIC process to business and industry representatives as a testament to the rigor and relevance of its CTE programs. By contrast, states interviewed for this study did not report that the monitoring process figured prominently in their outreach to business and industry partners.

Recommendations for Next Steps

Alabama may build upon the work completed during this TA project by taking the following steps:

- Review other states' overall monitoring processes and determine which examples are most appropriate for Alabama. States profiled in this study adopted a variety of approaches to
    - the monitoring process and how it is structured;
    - the risk factors they consider when identifying sites for additional review; and
    - the documentation that will be reviewed for each monitoring step and used to assess each risk factor.
- Develop a draft list of risk factors for use in Alabama to review with state and local staff and review through a webinar or state convening.
    - Identify potential "blind spots" in Education Department General Administrative Regulations (EDGAR) and other states and identify Alabama-specific risk-factors to address those gaps.
    - Consider prioritizing risk factors to help local sites focus how they prepare.
- Pilot the risk factors (and, as feasible, the process) with a subset of CTE providers to assess their value, collect feedback, and build buy-in.

Appendix A: CTE Program Monitoring—Interview Protocol for State Agency Staff

1. Who is responsible for monitoring CTE programs in your agency?
    a. How many state-level staff members do CTE program monitoring?
        i. Do these staff members also have responsibility for CTE programs (curriculum design, etc.).
    b. Are staff members responsible for the whole monitoring process or do they specialize in different components?
    c. Are monitoring assignments based on state staff members' content knowledge (i.e., do you have someone from ag-science reviewing ag-science programs?)?
2. What are the components of your monitoring process (i.e., desktop monitoring, phone monitoring, site visits)?
    a. What is the expected level of effort for each?
    b. At what level (program, school, or district) is monitoring conducted?
    c. When and how often do states monitor programs?
        i. Do you review a percentage of programs on a set schedule?
        ii. What percentage and on what schedule?
3. What is the longest period that a program, school, or district might have between on-site monitoring visits?
    a. Have there been concerns about sites or LEAs flying under the radar?
    b. Have business and industry representatives expressed any concerns about monitoring frequency?
    c. If so, how have you addressed those concerns?
4. Which regulations or policies guide the monitoring process (Perkins, state CTE program standards, curriculum requirements)?
    a. Is CTE program monitoring combined with other monitoring (e.g., *Every Student Succeeds Act*)?
5. What data and documentation are collected during monitoring?
    a. Does the information collected vary by level of review?
6. What are the criteria for determining which programs, schools, or districts are at risk?
    a. What is the monitoring process for sites determined to be at risk?
7. What TA is provided in conjunction with the monitoring process?
8. What role do electronic monitoring systems have in the monitoring systems?
    a. If monitoring materials are collected electronically, how is the information submitted verified?
9. What expectations are there for school- or district-level self-monitoring (including conducting evaluations) and reporting on self-monitoring activities to the state?
10. What role does data collection for program improvement, or data-based program improvement cycles play in your monitoring system?

   a. Do sites mostly view the monitoring process as ensuring compliance, or do they consider it useful for program planning and design?
   b. Do you know of instances where the process has led to program changes and improvements?

11. What have you found to be the most valuable component of your monitoring programs? (e.g., if faced with a significant reduction in resources, what would you prioritize?)
    a. What do you feel could use improvement?
12. Do you include descriptions of your monitoring process in communications with CTE stakeholders, such as employers, as an assurance of program quality?
13. Does your state conduct system-wide CTE reviews or audits?
    a. If so, how often are these reviews done?
    b. What is the review process?

Appendix B: Examples of Documentation by Stage in the Monitoring Process

Monitoring stage	Example documents	State
Risk assessment	Local education agency CTE grant application and application budget	New Mexico
	Local education agency's inventory	New Mexico
	Local education agency's procurement procedures	New Mexico
	Budget summary	Tennessee
	Quarterly expenditure reports	Tennessee
	Budget amendments	Tennessee
	Requisitions	Tennessee
	Payroll disbursements	Tennessee
	Perkins report card	Tennessee
	Information showing that 75 percent of CTE programs are designated program of study	Iowa
	Sample of inventory methods used for Perkins equipment	Iowa
Desktop or on-site monitoring visit*	Payroll and expenditure records for secondary and postsecondary institutions	Minnesota
	Administrative expenditures	Minnesota
	Personnel activity reports	Minnesota
	Placement or matriculation information for completers one year after graduation	Minnesota
	General ledger	Colorado
	Invoices/samples of transactions	Colorado
	Student transcripts	Colorado
	Equipment inventory	Colorado

*States collected similar documentation for on-site and desktop monitoring.

Appendix C: List of Risk Factors

Risk factor category	Risk factor	**State**
Finance	Award allocations	Colorado
	Unexpected grant funds (a lack of internal controls/program issues)	Florida
	Perkins funds (spending, matching)	Georgia
	Spending on equipment	Georgia
	Personnel activity reports and use of funds in these areas	Georgia
	Decision-making process for use of Perkins funds	Iowa
	Resolution on any issues identified in use of funds, etc.	Iowa
	Required activities under "Local Uses of Funds"	Iowa
	Permitted activities under "Local Uses of Funds"	Iowa
	Budget/use of funds	Iowa
	Fiscal processes and patterns	Minnesota
	Fiscal operations (supplemental factor)	Minnesota
	Fiscal findings	Missouri
	Late budget	Missouri
	Late Final Expenditure Report	Missouri
	Overpayments	Missouri
	Lapsed/forfeited funds	Missouri
	Late fiscal monitoring	Missouri
	Financial concerns (may include financial distress, impending school closure, indications of fraud/abuse, cash management plan assignment, or award restrictions)	Missouri
	Award letter (85 percent of award letter accomplished, accounting of funds)	New Mexico
	Procurement procedures	New Mexico
	Local budget application (spending is within Perkins requirements, budget approval prior to obligating funds, project director can plan and implement budget)	New Mexico
	Fiscal findings (financial management standards, internal controls)	New Mexico
	Funding status (spenddown)	New Mexico
	Grant expenditures (aligned with grant purposes, documented, etc.)	New Mexico
	Financials (how they spend their money, spenddown)	North Carolina
	Local budget application (spending, in accordance with plan, CTE director authorized to make expenditures)	Tennessee
	Purchasing procedures (purchasing procedures in place, purchasing requests linked to standards)	Tennessee
	Fiscal findings (line-item expenditures in line with budget, expenditures made with approval of CTE director)	Tennessee
	Funding status (drawdown)	Tennessee
	Funds generated (small, medium, large)	Tennessee

Risk factor category	Risk factor	**State**
Monitoring history	Time since last visit	Colorado
	Concerns or exceptions through grant review or data reporting	Colorado
	History of audit findings (findings from prior three auditor general audits)	Florida
	Last monitoring review	Florida
	Compliance review improvement plan	Georgia
	Issues (concerns, recommendations, compliance) identified for CTE during most recent school improvement review or accreditation visit	Iowa
	Resolution on any issues identified in use of funds, etc.	Iowa
	"Random" selection to ensure that each consortium is monitored during the lifetime of the *Perkins* Act (supplemental factor)	Minnesota
	Audit finding	Missouri
	Timely correction of findings	Missouri
	Time since last monitoring visit	New Mexico
	Last monitoring visit	North Carolina
	Time since last monitoring visit	Tennessee
Quantitative data findings	Concerns or exceptions through grant review or data reporting	Colorado
	Performance improvement plan (PIP) index (providers unable to meet projected performance level for multiple years)	Florida
	Student data, enrollment	Georgia
	Compliance review improvement plan	Georgia
	Missed Perkins performance indicators	Georgia (postsecondary)
	How yearly performance targets are set	Iowa
	Activities for improvement when targets are not met	Iowa
	Resolution on any issues identified in use of funds, etc.	Iowa
	Targets met on performance indicators	Minnesota
	Evidence of data-driven decisions	Minnesota
	Program performance (supplemental factor)	Minnesota
	Data reporting (supplemental factor)	Minnesota
	Use of data	New Mexico
	Perkins performance metrics	North Carolina
	Percentage of credentials students earn	North Carolina
	Quality program development (sampled programs meet all quality indicators, performance on quality indicators, teacher licensing, spending on programs NOT meeting performance indicators)	Tennessee
	Core indicators of performance (LEA performance)	Tennessee
	Improvement plan core indicators of performance	Tennessee
	Compliance (private schools notified of CTE offerings/professional development, spending on areas addressing core indicators in which the LEA did not meet performance targets, serving the needs of special populations)	Tennessee

Risk factor category	Risk factor	**State**
Staff stability	Organizational changes (change in director, experience level of director)	Florida
	Evidence of unified planning and decision-making	Minnesota
	Stable leadership/governance	Minnesota
	New personnel	Missouri
	Project director/administrator experience	New Mexico
	Licensure (director)	North Carolina
	CTE director experience and responsibility (system-wide director)	Tennessee
Volume of grant funding	Volume of federal funds (more funds = more risk)	Florida
	Number of grants (more grants = more risk)	Florida
	Size of budget	Georgia (postsecondary)
	Allocation amount	Missouri
	Grant size	New Mexico
	Size (budget, enrollment)	North Carolina
	Funds generated (small, medium, large)	Tennessee
Other program characteristics	Nondiscrimination policies/notices	Georgia
	Advisory committees	Georgia
	Provisions for special populations	Iowa
	Policies and procedures around career readiness and nontraditional programs	Iowa
	Requested documentation (time and efforts sheets, information showing that 75 percent of CTE programs are programs of study, sample of inventory methods for Perkins equipment, citation for documentation)	Iowa
	Service to special populations	Minnesota
	Quality programs of study and rigorous programs of study	Minnesota
	Technical skills assessments in place	Minnesota
	Program performance (supplemental factor)	Minnesota
	Quality program development (adherence to quality requirements)	New Mexico
	Local plan/addenda (percentage of actions accomplished)	Tennessee
Lack of professional development	LEA personnel attend division training	Missouri
	Professional development of High Schools That Work (HSTW) directors	New Mexico
	Professional development of HSTW teachers	New Mexico
	Staff participation in professional development	North Carolina
	Professional development of CTE teachers	Tennessee
	Professional development of CTE director	Tennessee
Data quality concerns	Data collection process	Colorado
	Ability to submit data (including enrollment figures)	Minnesota
	Data reporting (accuracy/timeliness)	New Mexico
	On-time reporting	Tennessee

Risk factor category	Risk factor	**State**
Subrecipient size	Student data, enrollment	Georgia
	District size (enrollment)	New Mexico
	Size (budget, enrollment)	North Carolina
	Percentage of CTE concentrators	North Carolina
Miscellaneous	Director has system-wide responsibilities	Georgia
	Requested documentation (time and efforts sheets, information showing that 75 percent of CTE programs are programs of study, sample of inventory methods for Perkins equipment, citation for documentation)	Iowa
	Physical inventory (frequency of inventory taken, disposition of out-of-date items, etc.)	Tennessee